



# Planning Approval Consistency Assessment Form

SM-17-00000111

Sydney Metro – Metro Body of Knowledge (MBoK)

|                                            |                                              |
|--------------------------------------------|----------------------------------------------|
| Assessment Name:                           | Luddenham Precinct Changes                   |
| Prepared by:                               | Sydney Metro                                 |
| Prepared for:                              | Sydney Metro and contractors                 |
| Assessment number:                         | SM009                                        |
| Type of assessment:                        | Assessment under EP&A Act 1979, Division 5.1 |
| Version:                                   | Final (1.0)                                  |
| Planning approval No.<br>(where relevant): | SSI 10051<br>EPBC 2020/8687                  |
| Date required:                             | September 2025                               |
| iCentral number                            | SM-25-00196035                               |

Form information – do not alter

|                     |                                                            |
|---------------------|------------------------------------------------------------|
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## Table of Contents

|                                                                                 |    |
|---------------------------------------------------------------------------------|----|
| 1. Existing Approved Project .....                                              | 3  |
| 2. Description of proposed change which is the subject of this assessment ..... | 6  |
| 3. Timeframe.....                                                               | 7  |
| 4. Site description .....                                                       | 7  |
| 5. Site Environmental Characteristics .....                                     | 7  |
| 6. Justification for the proposed change .....                                  | 7  |
| 7. Environmental Benefit .....                                                  | 8  |
| 8. Control Measures.....                                                        | 8  |
| 9. Conditions of approval / Environmental mitigation measures .....             | 8  |
| 10. Impact Assessment – Construction.....                                       | 12 |
| 11. Impact Assessment – Operation.....                                          | 16 |
| 12. Consistency with the Approved Project .....                                 | 19 |
| 13. Other Environmental Approvals .....                                         | 20 |
| 14. Recommendation .....                                                        | 20 |
| Author certification .....                                                      | 21 |
| Appendix A – Figures .....                                                      | 23 |

## 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 and Elizabeth Drive and applies to this assessment however the works do not impact protected matters or impact Commonwealth land so this approval is not considered further.
- 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"> <li>• SSI_10051 Infrastructure approval dated 23 July 2021 and modified 14 April 2022, and on 20 December 2024</li> <li>• EPBC 2020/8687 Approval dated 3 June 2021 – not considered further</li> <li>• Western Sydney Airport: Airport Plan as varied 15 September 2021 – does not apply to this assessment</li> </ul> | Type of planning approval: | <ul style="list-style-type: none"> <li>• SSI_10051: Critical State Significant Infrastructure (SSI_10051) under <i>Environmental Planning and Assessment Act 1979</i> (NSW)</li> <li>• EPBC 2020/8687: construct and operate a rail link from St Marys to Elizabeth Drive as a controlled action under <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)</li> <li>• Western Sydney Airport: Airport Plan (as varied September 2021): Variation to the Airport Plan under the <i>Airports Act 1996</i> (Cth)</li> </ul> |
|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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)
- SMCA006 Luddenham Revised Footprint (originally dated 4 November 2022 and updated 9 January 2025)
- SMCA008 Luddenham site alternative access road (dated 9 January 2023)

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> and the Sydney Metro document library <https://www.sydneymetro.info/documents>

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 (CoA).

Description of existing approved project you are assessing for consistency:

Construction and operation of the Luddenham Road 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**

#### **Chapter 8 – Construction**

##### **Section 8.7 Construction Sites**

##### **Section 8.7.6 Luddenham Road**

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 was updated under previous consistency assessments SM006 and SM008.

#### **Chapter 9 – Transport**

##### **Section 9.6 Potential impacts – operation**

##### **Integration with other transport modes – Luddenham Road Station**

The proposed Luddenham Road Station precinct would be located to the west of Luddenham Road within the proposed Northern Gateway precinct, which forms part of Western Sydney Aerotropolis. Future access arrangements between the station and the wider precinct, in addition to on-street car parking within the precinct, would be developed as part of the masterplan for the area. Luddenham Road Station would provide:

- connection to future walking and cycling corridors (proposed as part of the master plan for the adjoining development)
- [...]

##### **Future year 2025 with the project – Luddenham Road Station**

In the Luddenham Road precinct, the provision of traffic signals including signalised pedestrian crossings at the intersection of Luddenham Road and the future precinct street (north) and Luddenham Road and the future precinct street (south) may be required to permit vehicle movements into the station precinct. These upgrades may include provisions for an additional approach, pedestrian and bicycle crossings and potential bus priority.

### **Submissions Report**

#### **Appendix B – Revised project description**

##### **Section 1.3.2 Common station elements**

Metro stations would be designed to provide safe and efficient interchange between transport modes, including minimising conflicts between pedestrians, cyclists, buses and vehicles. Each metro station would have a number of common elements or design features. These would include:

[...]

- enhancements to and/or provision of footpaths in the immediate vicinity of the station entries

#### *Additional station precinct elements for off-airport stations*

Building new metro stations would create opportunities to shape and create vibrant and attractive precincts surrounding each station. The off-airport station precincts would include:

[...]

- station access walkways and cycle paths, other pedestrian and cycle facilities, access roads, modal priority infrastructure (bus lanes and access roads), road modifications and intersection treatments, stormwater infrastructure and other ancillary facilities.

#### Section 1.4.3 Luddenham Road Station – Station precinct and interchange facilities

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

[...]

- 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 layout of Luddenham Road Station is shown in Figure 1 of Appendix A. Note that the layout is indicative only and is subject to design development.

#### Section 1.6.1 Road network and parking changes

While the project would largely be separated from the existing road network, some project elements would impact existing streets. To safely integrate and accommodate the project, the changes summarised in Table 1-3 would be required to the existing road network. Some of these modification works may be delivered by others as part of road upgrades within the precinct ahead of the operation of the project.

| Location       | Road/Intersection                                           | Indicative change to road network and existing parking                                                                                                                                                                           |
|----------------|-------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Luddenham Road | New precinct street (north) and Luddenham Road intersection | <ul style="list-style-type: none"> <li>• provision of new signalised intersection and pedestrian crossing to facilitate vehicles and pedestrian movements into the station precinct</li> <li>• bus priority measures.</li> </ul> |
|                | New precinct street (south) and Luddenham Road intersection | <ul style="list-style-type: none"> <li>• provision of new signalised intersection and pedestrian crossing to facilitate vehicles and pedestrian movements into the station precinct</li> <li>• bus priority measures.</li> </ul> |

**Table 1 – Indicative permanent changes to the road network and existing parking (Submissions Report).**

#### Section 2.4.2 Earthworks

Earthworks (for example, cuttings and embankments) would be required at locations along the project alignment to achieve required levels for the surface track alignment. Sections of cut and embankment batters would not typically require support; however, in some instances, the cut and embankment sections may require structural support (for example by retaining walls, piles and soil nails). Earthworks associated with the excavation of station boxes are described in Section 2.5.1.



The existing geology would influence the slope of the cut batters. The properties of the fill material used to create the embankments would determine the slope of the embankment batters. The width required to transition to the depth below or height above existing ground level would vary along the alignment.

Earthworks would also be required along the project alignment for drainage structures and water quality basins.

The general sequence for earthworks would be as follows:

- ground stabilisation works as required
- construction of bored pile wall or similar infrastructure where required
- earthworks cut and fill to design levels
- construction of retaining structures and drainage elements where required as the earthworks progress

## Appendix D – Design Guidelines

### Section 3.3.4 Vehicular Interface (Guidelines)

- The design of stations and associated urban realm is to respond to the character of established streets and variations in carriageway width, on-street parking, existing and planned future cycle ways, and street tree planting and pedestrian amenity.
- Modifications to existing roads and development of new roads in station precincts are to consider:
  - [...]
- Intersection types and configuration signalling requirements
  - [...]
  - Cycling
  - Footpaths
  - Crossings
- Streets, footpaths, and bicycle paths are to contribute to the quality and character of urban area and will heavily influence customer experience.

### Section 4.2.10 Shared User, Cycle and Pedestrian Paths (Guidelines)

- Paths must comply with Austroads requirements for dedicated and shared bicycle paths with acceptable minimum widths:
  - Pedestrian - 2 metres
  - Cycle - 2.5 metres
  - Shared Path - 4 metres
- As a minimum provision, in or adjacent to the rail corridor, new paths should be shared paths (desirable width 4 metres) or, where possible, separated paths.
- Where walking or cycling routes have to crossroads/ intersections investigate dedicated crossings or other traffic management measures to create safe crossing points.

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

A previous Consistency Assessment (SM006) was endorsed in November 2022 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. It was revised and endorsed in January 2025 to make 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. A previous Consistency Assessment (SM008) was also endorsed in January 2023 which related to a temporary change to the construction footprint to permit a temporary access road to an adjoining property, this was temporary only and is not considered further.

A map of the revised Luddenham Road construction site and Luddenham precinct road works are shown in Figures 2 and 3 of Appendix A.

This Consistency Assessment relates to the proposed precinct changes at Luddenham Station which include:

- Removal of the shared paths on the LDN2 roundabout (intersection of Precinct Road 1 and Luddenham Road). The shared paths will stop prior to Luddenham Road.
- Narrowing of the shared path on the western side of Precinct Road 2 from 4 metres to 3 metres to facilitate the construction of a 130-metre-long soil reinforced retaining wall and a safety fence with a maximum height of 2.6 metres.

Drawings of the proposed change are shown in Figures 4 and 5 of Appendix A

### 3. Timeframe

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

### 4. Site description

The proposal would be located on Lot 201 DP12800188, Lot 300 DP1305043, and Lot 301 DP1305043.

The location of the proposal is provided in Figure 1 of Appendix A.

### 5. Site Environmental Characteristics

The existing environment within the Luddenham Road construction site consists of cleared land previously 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

The proposed narrowing of the shared path on the western side of Precinct Road 2 responds to outcomes of consultation with key stakeholders (such as Penrith City Council) during design development of station interchanges and precincts as required under mitigation measure OLU2. The proposed change is also required to enable the

construction of earthworks with a longer design life and reduced maintenance requirements, thereby improving the long-term resilience and operational efficiency of the project.

The removal of the shared paths on the LDN2 roundabout (at the intersection of Precinct Road 1 and Luddenham Road) is a result of further refinement of the precinct's active transport network. Delivering the shared paths at this stage would provide limited benefit, as the broader active transport network outside the precinct is not yet developed and is unlikely to be delivered prior to Day 1 of operations, additionally the intersection may be reconfigured in future leading to the construction of redundant infrastructure.

Drawings of the proposed change are shown in Figures 4 and 5 of Appendix A.

## 7. Environmental Benefit

The narrowing of the shared path on the western side of Precinct Road 2 enables the construction of a soil reinforced retaining wall, which will improve slope stability and reduce the risk of erosion and sedimentation during both construction and operation. The 100-year design-life also reduces the need for ongoing maintenance and associated resource use, contributing to long-term environmental sustainability.

Additionally, the removal of the shared paths on the LDN2 roundabout avoids construction in areas where active transport connectivity is not yet viable due to uncertain development timelines of adjacent land. This minimises disturbance to surrounding land and vegetation, reduces material use, and avoids construction of redundant infrastructure that may require future modification.

## 8. Control Measures

|                                                   |                                        |                                                                         |                                         |
|---------------------------------------------------|----------------------------------------|-------------------------------------------------------------------------|-----------------------------------------|
| Will a project and site specific EMP be prepared? | <input type="checkbox"/> Yes           | Are appropriate control measures already identified in an existing EMP? | <input checked="" type="checkbox"/> Yes |
|                                                   | <input checked="" 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 |
|--------|---------------------------------------------------------|-------------------------------------------------------------|
|--------|---------------------------------------------------------|-------------------------------------------------------------|



|         |                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CoA A1  | <p>The Proponent must carry out the CSSI in accordance with the terms of this approval and generally in accordance with the:</p> <p>(a) Sydney Metro – Western Sydney Airport Environmental Impact Statement dated 21 October 2020;</p> <p>(b) Sydney Metro – Western Sydney Airport Submissions Report submitted April 2021;</p> | <p>The indicative layout plan for Luddenham Station, as presented in the SM-WSA EIS and Submissions Report, includes a new or reinstated carriageway with associated footpaths at the intersection of Precinct Road 1 and Luddenham Road. The proposed removal of the shared paths at the LDN2 roundabout reflects ongoing design development and responds to the current context of the surrounding area. Specifically, it considers the lack of pedestrian infrastructure along Luddenham Road and acknowledges the absence of short-term development plans for adjacent lots. Accordingly, the proposed change is considered consistent with the Approved Project, as it aligns with the intent to minimise unnecessary infrastructure where it does not currently support connectivity or land use.</p> <p>Appendix E – Design Guidelines of the SM-WSA EIS and Submissions Report specifies a minimum shared path width of 4 metres. The proposed narrowing of the shared path on the western side of Precinct Road 2 to a revised width of 3 metres is a result of detailed design development and was undertaken in consultation with Penrith City Council. This change facilitates the construction of a soil-reinforced retaining wall with an extended design life, while continuing to support future active transport connectivity.</p> <p>The rest of the precinct works will be carried out generally in accordance with the SM-WSA EIS and Submission Report.</p> |
| CoA A14 | <p>Where changes are proposed to the staging of construction or operation, a revised Staging Report must be prepared and submitted to the Planning Secretary for information before the commencement of changes to the stage of construction or the stage of operation.</p>                                                       | <p>The Staging Report will not need to be revised to reflect the descope or modified precinct elements.</p> <p>The rest of the precinct works will be carried out generally in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in CoA A1.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| CoA E77 | <p>A PUDCLP must be prepared to document and illustrate the permanent built works and landscape design of the CSSI and how these works are to be maintained. The PUDCLP must be:</p> <p>[...]</p> <p>(d) implemented during construction and operation of the CSSI.</p>                                                           | <p>The SSTOM Stage 2 PUDCLP – which requires a 4-metre shared path to be constructed on Precinct Road 2 – has been prepared in accordance with the condition requirements.</p> <p>The proposed change does not cause the PUDCLP to be inconsistent with the condition requirements, as the wider master planning and precinct works for Luddenham are ongoing and yet to be finalised; therefore, the PUDCLP represents the precinct designs at a point in time.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

|                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CoA E79                                                                                                                                                          | <p>The PUDCLP must include descriptions and visualisations (as appropriate) of:</p> <p>(a) design of the permanent built elements of the CSSI, including stabling and maintenance and ancillary facilities, service facilities and tunnel portals</p> <p>(b) plans for station precincts including but not limited to</p> <p>(v) active transport connections and end of trip facilities, design of pedestrian and cycle access, facilities and fixtures;</p> <p>[...]</p> <p>(i) the timing and responsibilities for implementation of elements included within the PUDCLP</p> | <p>The proposed change does not result in the removal of active transport connections detailed in the PUDCLP and the reduction of width of the shared path on the western side of Precinct Road 2 is considered minor.</p> <p>The shared path would still be constructed prior to Day 1 of operation.</p>                                                                                                                                                                          |
| CoA E119                                                                                                                                                         | <p>Permanent road works, including vehicular access, signalised intersection works, and works relating to pedestrians, cyclists, and public transport users must be subject to safety audits demonstrating consistency with relevant design engineering and safety standards and guidelines.</p>                                                                                                                                                                                                                                                                                | <p>No change to the Approved Project.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| REMM OT1                                                                                                                                                         | <p>Interchange access plans would be prepared, in consultation with the Traffic and Transport Liaison Group and relevant authorities including Western Parkland City Authority, to ensure adequate pedestrian and cycle facilities and other transport interchange infrastructure is provided at each station precinct</p>                                                                                                                                                                                                                                                      | <p>No change to the Approved Project.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| REMM OT3                                                                                                                                                         | <p>Consultation and coordination with Transport for New South Wales (TfNSW) through the TTLG to align planned road and intersection upgrades with the year of opening to enable safe and efficient interchanges between transport modes.</p>                                                                                                                                                                                                                                                                                                                                    | <p>No change to the Approved Project. Sydney Metro have and will continue to consult with key stakeholders on the station interchange and precinct designs.</p>                                                                                                                                                                                                                                                                                                                    |
| REMM OLU2                                                                                                                                                        | <p>Sydney Metro would continue to consult with key stakeholders during design development of the station interchanges and precincts</p>                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>The proposed narrowing of the shared path on the western side of Precinct Road 2 to a revised width of 3 metres is a result of detailed design development and was undertaken in consultation with Penrith City Council.</p> <p>No change to the Approved Project. Sydney Metro have and will continue to consult with key stakeholders on the station interchange and precinct designs, noting that this proposal removes the deferred wider precinct elements from scope.</p> |
| <b>EPBC Act conditions of approval</b>                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Not considered further as the proposed change does not include physical works and would not impact protected matters or extend into or affect Commonwealth Land. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

Will the proposed change be consistent with the conditions of approval?

☒ Yes

☐ No

## 10. Impact Assessment – Construction

| 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 proposed removal of the shared paths at the LDN2 roundabout does not involve physical works, as such there are no impacts to biodiversity.</p> <p>The proposed width reduction of a 130-metre section of shared path on Precinct Road 2 would not result in additional impacts to biodiversity.</p> <p>No change from the Approved Project.</p>                                                                                                                                                                                                   | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Water                   | <p>The proposed removal of the shared paths at the LDN2 roundabout does not involve physical works, as such there are no impacts to water.</p> <p>The proposed width reduction of a 130-metre section of shared path on Precinct Road 2 would not result in additional impacts to water.</p> <p>No change from the Approved Project.</p>                                                                                                                                                                                                                 | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Soils and contamination | <p>The proposed removal of the shared paths at the LDN2 roundabout does not involve physical works, as such there are no soil and contamination impacts.</p> <p>The proposed width reduction of a 130-metre section of shared path on Precinct Road 2 is needed to facilitate the construction of a 130-metre soil reinforce retaining wall.</p> <p>However, the construction of the retaining wall forms part of the Approved Project, and the proposed reduction of the shared path would not result in additional soil and contamination impacts.</p> | No additional measures required                                | Y                     | N                                  | Y        | N/A      |

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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 |
|                                 | There are no known occurrences of salinity or Acid Sulfate Soils (ASS) on the Luddenham construction site. A search of the NSW eSpade database and NSW Planning Portal on 31 October 2025 confirms that there are no occurrences of salinity or ASS at the Luddenham construction site.<br>No change from the Approved Project.                 |                                                                |                       |                                    |          |          |
| Air quality                     | The proposed removal of the shared paths at the LDN2 roundabout does not involve physical works, as such there are no air quality impacts.<br>The proposed width reduction of a 130-metre section of shared path on Precinct Road 2 would not result in additional air quality impacts.<br>No change from the Approved Project.                 | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Noise and vibration             | The proposed removal of the shared paths at the LDN2 roundabout does not involve physical works, as such there are no noise and vibration impacts.<br>The proposed width reduction of a 130-metre section of shared path on Precinct Road 2 would not result in additional noise and vibration impacts.<br>No change from the Approved Project. | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Aboriginal Culture and Heritage | The proposed removal of the shared paths at the LDN2 roundabout does not involve physical works, as such there are no impacts to Aboriginal Culture and Heritage.<br>The proposed width reduction of a 130-metre section of shared path on Precinct Road 2 would                                                                                | No additional measures required                                | Y                     | N                                  | 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 | Consistent Impact Y/N | Do any CoA need to be changed? Y/N | Endorsed |          |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|-----------------------|------------------------------------|----------|----------|
|                              |                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                |                       |                                    | Y/N      | Comments |
|                              | not result in additional impacts to Aboriginal Culture and Heritage.<br>No change from the Approved Project.                                                                                                                                                                                                                                                                                                                    |                                                                |                       |                                    |          |          |
| Historic Heritage            | 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 proposal would remove the shared paths on the LDN2 roundabout at the intersection of Precinct Road 1 and Luddenham Road . The new intersections with Luddenham Road have been considered under the Approved Project.<br>No change from the Approved Project.     | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Community and socio-economic | The proposed removal of the shared paths at the LDN2 roundabout does not involve physical works, as such there are no community and socio-economic impacts.<br>The proposed width reduction of a 130-metre section of shared path on the western side Precinct Road 2 would not result in additional community and socio-economic impacts.<br>No change from the Approved Project.                                              | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Traffic and transport        | The proposal includes the removal of shared paths at the LDN2 roundabout, terminating at the intersection with Luddenham Road, and a reduction in footpath width on the eastern side of Precinct Road 2 from 4 metres to 3 metres. The removal avoids construction in areas where no active transport connection is currently available due to uncertain development timelines of adjacent land, thereby eliminating impacts on | No additional measures required                                | Y                     | N                                  | 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 | Consistent Impact Y/N | Do any CoA need to be changed? Y/N | Endorsed |          |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|-----------------------|------------------------------------|----------|----------|
|                                    |                                                                                                                                                                                                                                                                                                                                |                                                                |                       |                                    | Y/N      | Comments |
|                                    | vehicle traffic associated with shared path construction.<br><br>The proposal also includes a reduction in width of a 130 m section of shared path on the western side of Precinct Road 2 from 4 metres to 3 metres. This change is not expected to result in any additional traffic or transport impacts during construction. |                                                                |                       |                                    |          |          |
| Waste and resource management      | The proposed change does not involve physical works, as such there are no impacts on waste and resource management. However the reduction in scope would avoid the construction of redundant infrastructure which may be removed or reconfigured at a later date.<br>No change from the Approved Project.                      | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Visual                             | No change from the Approved Project.                                                                                                                                                                                                                                                                                           | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Land use and property              | No change from the Approved Project.                                                                                                                                                                                                                                                                                           | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Hazard and risk                    | No change from the Approved Project.                                                                                                                                                                                                                                                                                           | No additional measures required                                | Y                     | N                                  | 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                     | N                                  | Y        | N/A      |

## 11. Impact Assessment – Operation

| 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        | N/A      |
| Water                           | No change from the Approved Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Soils and contamination         | <p>The proposed removal of the shared paths at the LDN2 roundabout does not involve physical works, as such there are no soil and contamination impacts.</p> <p>The proposed width reduction of a 130-metre section of shared path on Precinct Road 2 and the 130-metre soil reinforced retaining wall would not result in additional soil and contamination impacts during operation.</p> <p>The retaining wall provides a net positive effect on soil stability by reducing the risk of erosion and prevent uncontrolled sediment movement and potential contamination into the surrounding environment.</p> <p>No change from the Approved Project.</p> | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Air quality                     | No change from the Approved Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Noise and vibration             | No change from the Approved Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Aboriginal Culture and Heritage | No change from the Approved Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Historic Heritage               | No change from the Approved Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Community and socio-economic    | No change from the Approved Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Traffic and transport           | The proposal includes the removal of shared paths at the LDN2 roundabout reducing active                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | No additional measures required                                | Y                     | N                                  | Y        | N/A      |

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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 |
|                               | <p>transport connections to future pedestrian facilities. However the changes to do preclude these shared paths from being built in future when connections to active transport facilities are available.</p> <p>The shared path remains functionally adequate, with no adverse impacts on pedestrian or cyclist mobility within the precinct during operation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                |                       |                                    |          |          |
| Waste and resource management | <p>The proposed change does result in additional waste and resource management impacts during operation.</p> <p>The soil-reinforced retaining walls and associated batters have been designed with a 100-year design life which significantly reduces any potential major maintenance activities and the associated material use and energy consumption during the design life of the retaining wall.</p> <p>Additionally, the removal of shared paths at the LDN2 roundabout avoids the construction of infrastructure that would provide limited benefit in the short term and may require reconfiguration when the intersection is upgraded in the future. This measure prevents the creation of redundant assets, reducing waste and resource use associated with demolition and reconstruction.</p> <p>No change from the Approved Project.</p> | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Visual                        | No change from the Approved Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Land use and property         | No change from the Approved Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | No additional measures required                                | Y                     | N                                  | Y        | N/A      |
| Hazard and risk               | No change from the Approved Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | No additional measures required                                | Y                     | N                                  | 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 | Consistent Impact<br>Y/N | Do any CoA need to be changed?<br>Y/N | Endorsed |          |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|--------------------------|---------------------------------------|----------|----------|
|                                    |                                                                                                                                                                                            |                                                                |                          |                                       | Y/N      | Comments |
| Management and mitigation measures | No change from the Approved Project.                                                                                                                                                       | No additional measures required                                | Y                        | N                                     | Y        | N/A      |

## 12. Consistency with the Approved Project

| Question                                                                                                                               | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Is the project (including the proposed changes) consistent with the conditions of approval?                                            | The proposed change would be consistent with the Conditions of Approval, as the proposal does not introduce new elements beyond the scope of the project approval. The modifications are considered minor and align with the intent of the Approved Project.                                                                                                                                                                                                                                                             |
| Is the project (including the proposed changes) consistent with the objectives and functions of elements of the Approved Project?      | The proposed change is consistent with the objectives and functions of the Approved Project.<br>Section 1.4.3 of the Submissions Report states that the Luddenham precinct layout is indicative only and is subject to design development. The proposal responds to the uncertain development timeframe of adjacent land and road corridors, while ensuring that the built elements (i.e. the retaining wall) would have a longer design life as requested in consultation with key stakeholders (Penrith City Council). |
| 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 construction activities and physical modifications are of similar scale and nature to those previously considered.                                                                                                                                                                                                                                                               |
| Are there any new environmental impacts as a result of the proposed works/project changes?                                             | The proposed change would not result in any new environmental impacts beyond those considered in the Approved Project.                                                                                                                                                                                                                                                                                                                                                                                                   |
| Are the impacts of the proposed activity/works known and understood?                                                                   | The impacts of the proposed change are known and understood. The indicative design and function of the active transport connections in 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 proposed change would be managed with the existing REMMs, CoAs and management plans for the project.                                                                                                                                                                                                                                                                                                                                                                                                  |
| Is the proposed change considered to have a significant impact to relevant controlling provisions under the EPBC Act?                  | No. The proposed works are not considered to have a significant impact to relevant controlling provisions 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<br><input checked="" type="checkbox"/> No                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Is the proposed change/s consistent with the approval (having regard to the above assessment)?                                         | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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## 13. Other Environmental Approvals

Identify all other approvals required for the proposed works:

Not applicable

## 14. Recommendation

Based on the above impact assessment, and with reference to the application number: SSI-10051, it is recommended that:

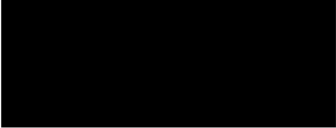
| Tick relevant box                                                                                                                                                                                                                                                                                                                   |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| 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:   | Planning Approvals Officer                                                        |            |                                                                                    |
| Company: | Sydney Metro                                                                      | Date:      | 3 November 2025                                                                    |

## Assessment Supporting Signature

Application supported and submitted by

|            |                                                                                         |           |            |
|------------|-----------------------------------------------------------------------------------------|-----------|------------|
| Name:      |        | Date:     | 13/11/2025 |
| Title:     | A/Director Environment Sustainability & Planning<br>Sydney Metro Western Sydney Airport | Comments: | Nil        |
| 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:     | 13/11/2025 |
| Title:      | A/Senior Manager<br>Planning Approvals | Comments: | N/A        |
| Signature:  |                                        |           |            |



## Appendix A – Figures



Figure 1 – Indicative layout and key design elements at Luddenham (Source: SM-WSA Submissions Report).

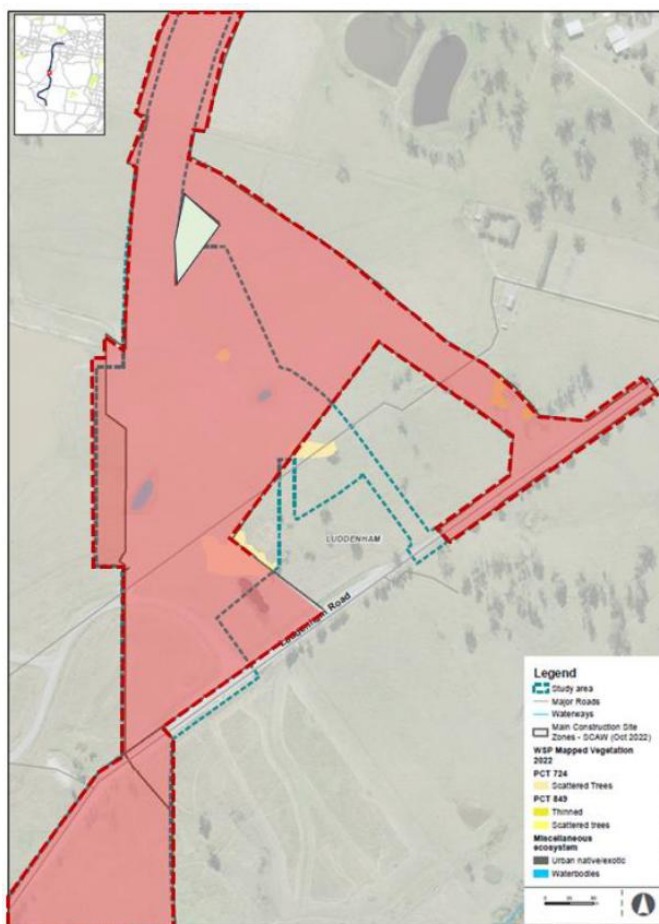


Figure 2 – Proposed revised Luddenham Road construction site, shown in red, in comparison to the Approved Project study area (Source: Consistency Assessment SM006).

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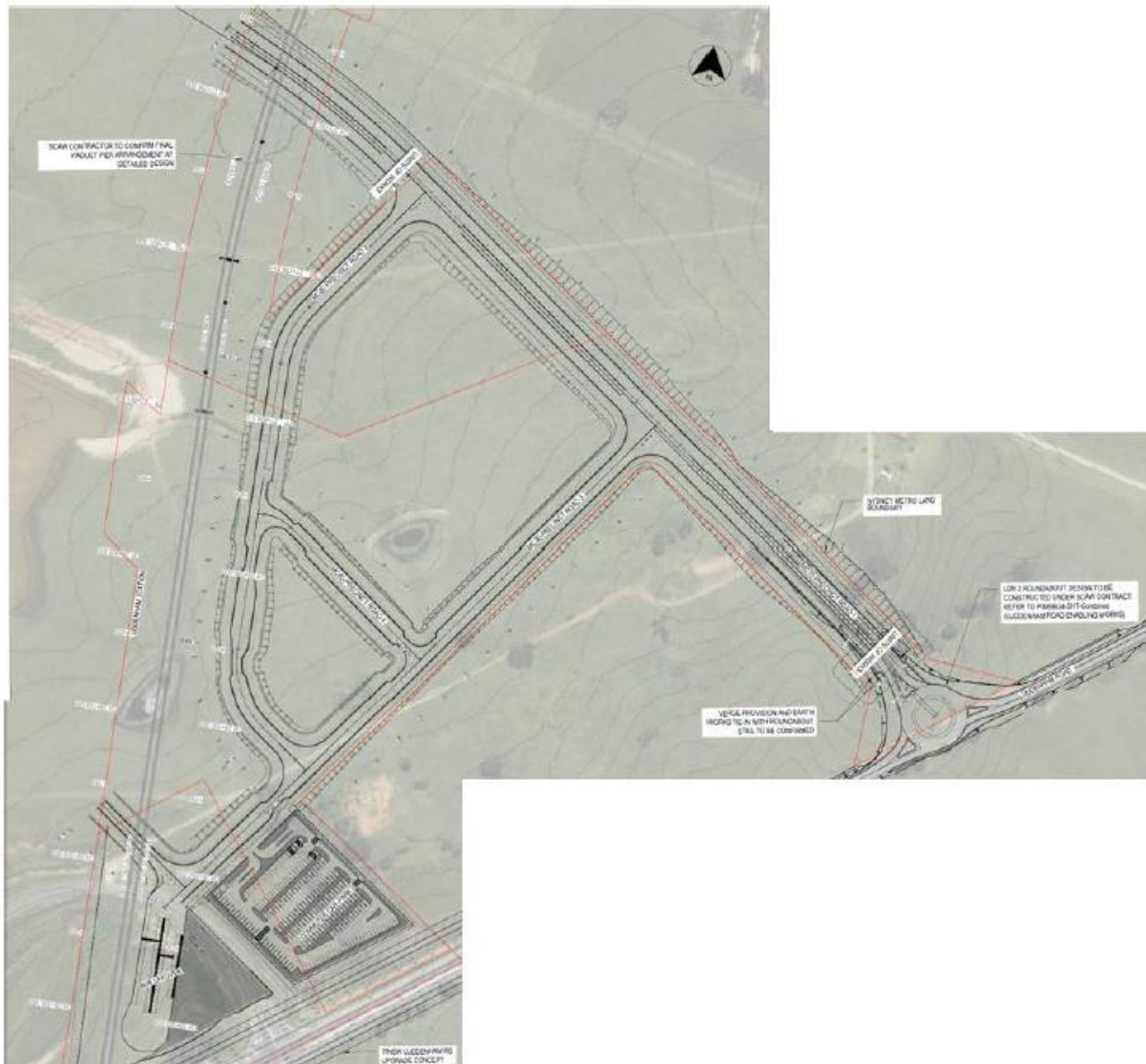


Figure 3 – Luddenham precinct road works (Source: Consistency Assessment SM006)

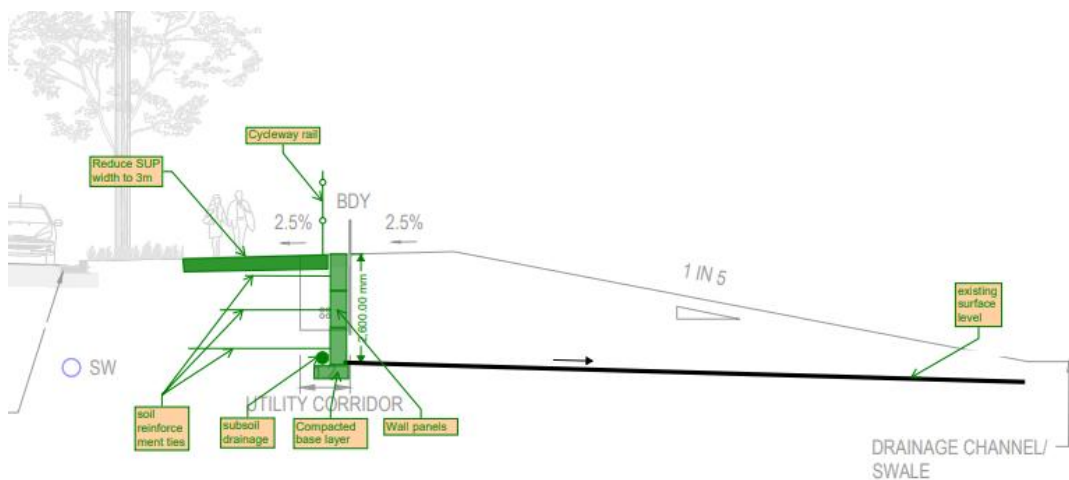


Figure 4 – Cross-section of Precinct Road 2 showing retaining wall construction and reduction of the shared path on the western side of Precinct Road 2.

