

25 February 2026

NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

To: Catriona Shirley
A/Team Leader, Industry Assessment

Building Two Advanced Manufacturing Research Facility (SSD-58591961- Mod-1)

Subject: Response to Request for Additional Information No.2

Dear Ms Shirley,

On behalf of the Bradfield Development Authority (BDA), this letter has been prepared by Architectus Australia Pty Ltd (Architectus) in response to the request for additional information from the Department of Planning, Housing and Infrastructure (DPHI) regarding comments provide by Liverpool City Council (LCC) dated 17 February 2026.

The matters raised in LCC's submission and the project response to each item is provided below.

Strategic Planning

Parking

LCC does not support the proposed reduction in on-site car parking and the reliance on off-site car parking. LCC asserts that this change is not consistent with the *Bradfield City Centre Master Plan* (the Master Plan). LCC requests that the car parking within the building envelope and basement of the proposal be retained.

The Master Plan forms part of the *Western Sydney Aerotropolis Development Control Plan – Phase 2* (the DCP) and provides a place-based vision, objectives, performance outcomes and benchmark solutions to guide future development in the Bradfield City Centre. This includes alternative benchmark solutions and additional performance outcomes and benchmark solutions to those in the wider Aerotropolis DCP. Nothing in the Master Plan alters car parking requirements contained in the DCP.

Being located within an 800m walking distance of the Aerotropolis Metro Station, the DCP sets maximum parking rates but no minimum parking rates for the site. Accordingly, there is no requirement to provide on-site car parking.

To reduce parking demand and encourage active transport utilisation, the modification proposes to reduce the quantity of parking spaces available to AMRF1 and AMRF2 to a total of 50 spaces already available on an adjacent site, which is also under the ownership of BDA. To further encourage more sustainable transport options, Mitigation Measure TTA1 and TTA2 require the implementation and routine update of the project's Green Travel Plan in accordance with Condition A2(e) of the existing approval.

BDA is taking a precinct wide approach to the delivery of public infrastructure including car parking. The first stage of civil and infrastructure works has recently been completed, delivering 178 on-street parking spaces, which are now operational.

BDA is also preparing a Bradfield City Centre Parking Strategy to guide the staged rollout of car parking infrastructure across the City Centre. As Bradfield develops, BDA will continue to monitor transport mode share, demand patterns, and parking utilisation within the precinct.

Architecture
Interior Architecture
Urban Design
Planning
Landscape Architecture

Adelaide
Brisbane
Canberra
Gold Coast
Melbourne
Perth
Sydney
Townsville

Auckland
Christchurch
Tauranga
Wellington

This adaptive and responsive approach ensures that parking and transport infrastructure provision remains aligned with actual demand, rather than pre-emptively oversupplying parking in a manner inconsistent with the strategic planning framework.

Public Transport and Active Transport

LCC state that the site is not currently connected to the broader regional active transport network and will not have access to this until Badgerys Creek Road is completed. Additionally, the site does not have access to a Metro line or station, as this work is currently delayed. LCC state that AMRF2 should therefore retain its on-site parking.

While regional connectivity infrastructure continues to be staged, it is important to recognise that substantial enabling works within Bradfield City are already complete. The first stage of civil and infrastructure works has delivered approximately 4km of new road lanes, 8km of active transport paths, integrated streetscapes, essential utilities, and public amenities. These works materially improve local connectivity and establish the internal transport framework necessary to support early development within the precinct.

Importantly, AMRF2 will not be operational until after the Aerotropolis Station (Sydney Metro) has commenced operations, currently anticipated in April 2027. Accordingly, the facility will open in the context of a functioning Metro connection, materially changing the transport accessibility profile of the site relative to present conditions.

Notwithstanding the above, it is acknowledged that infrastructure delivery across the Aerotropolis will continue progressively, further strengthening public and active transport connectivity to the site over time. The proposal has been developed with this staged infrastructure roll-out in mind and aligns with the strategic intent for Bradfield as a transit-oriented, innovation-focused precinct.

BDA, as a major landowner within Bradfield City, will continue to monitor transport mode share, demand patterns, and parking utilisation within the AMRF hub and surrounding precinct. This adaptive and responsive approach ensures that parking and transport infrastructure provision remains aligned with actual demand, rather than pre-emptively oversupplying parking in a manner inconsistent with the strategic planning framework.

For these reasons, the retention of additional on-site parking beyond that required by the applicable planning controls is neither necessary nor strategically justified.

Project Justification

LCC request that a condition of consent relating to the subdivision of the assigned car parking site be imposed to ensure that car parking for the proposal is available.

The applicable planning framework has clearly and deliberately set a maximum, but no minimum, car parking requirement for the site. Accordingly, it is unnecessary to impose any car parking requirement on the development. BDA does not accept LCC's recommended condition of consent.

LCC states that it does not support the provided project justification on the assumption that "broader sustainability outcomes" relates exclusively to cost saving measures.

In making their assessment, DPHI should note the broader sustainability outcomes signalled in the modification application which include:

- **Reduced physical and environmental impact on the site**, including minimised excavation, spoil removal, groundwater disruption and embodied carbon associated with basement construction.

- **Reduced construction impacts**, including fewer heavy vehicle movements, noise, vibration and extended construction timeframes.
- **Increased speed of construction and earlier delivery of employment floorspace**, supporting precinct activation and economic objectives.
- **Encouragement of mode shift**, supporting reduced private vehicle reliance and aligning with significant public investment in the regional active and public transport network, including Western Sydney Airport Metro.
- **Flexibility in precinct-wide parking management**, allowing BDA to adjust the quantum and distribution of parking supply across Bradfield over time in response to actual demand and evolving travel behaviours.

Traffic

LCC state that insufficient parking provision will impact the marketability of the developments within the Bradfield City Centre. Marketability is a private commercial matter for BDA and not a relevant planning consideration in determining the modification application.

More broadly, LCC recommends that temporary and flexible car parking areas be identified within the Bradfield City Centre area to facilitate developments in the short-term when public transport infrastructure is not sufficient to achieve high public transport mode shift. Matters pertaining to on-site and surrounding car parking are addressed above.

Contributions

A Cost of Development for each development stage was prepared in accordance with Section 208 of the *Environmental Planning and Assessment Regulation 2021* and the *Liverpool City Council Aerotropolis s7.12 Contributions Plan 2024*. These were provided to DPHI (via email) on 12 December 2025.

Urban Design

Connecting with Country

LCC has questioned what impact the Modification has on the Connecting with Country initiatives embedded in the approved scheme and whether Traditional Custodians have been consulted in relation to the proposed modification.

Design elements of the proposal will continue to reflect Connecting with Country initiatives consistent with the approved scheme.

AMRF2 will be interwoven with themes of the natural landscape, and the stories and customs of local Aboriginal people. Examples include creating spaces for collaboration and knowledge sharing, reflecting water and other life-sustaining natural elements, embracing seasonal and weather changes, and the interconnectedness of such aspects of the land.

The building façades and internal finishes will employ a mix of earthy materiality including exposed concrete and timber structure, clay bricks, ceramic cladding, rammed earth, and exposed aggregate to passively acknowledge Country. Material selection and placement will draw on the language of the surrounding geology, cultural knowledges and stories.

AMRF2 has been developed in consultation with relevant Aboriginal stakeholders. The project's Aboriginal heritage consultants, Comber, consulted with Gandangara Local Aboriginal Land Council in relation to the ACHAR process and with Aboriginal people who may hold cultural knowledge and those with an interest in the site (Registered Aboriginal Parties) in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. Noting that the design elements of the proposal will continue to reflect Connecting with Country

initiatives consistent with the approved scheme, there is no need for further consultation in association with the modification application.

Mitigation Measure CI1 requiring the inclusion of a minimum 1.5% Aboriginal participation in contracts valued at \$7.5M or greater in accordance with the Aboriginal Procurement Policy published by NSW Treasury will remain in force in accordance with Condition A2(e) of the existing approval. However, BDA is targeting a minimum 3% Aboriginal participation in the primary contract.

Public domain and landscape

LCC has sought additional information in relation to public domain interfaces and justification of the proposed changes to the courtyard water feature.

Updated public domain plans were provided within the updated Architectural Plans at plan sheet: STAGE 01 - SITE PLAN (AR-S1-SSDA03) and STAGE 02 - SITE PLAN (AR-S2-SSDA03).

The central courtyard has been redesigned, including a reconfiguration of levels to reflect changes to the basement beneath. It retains a water garden featuring a rill, an ephemeral creek garden and soaking pits, incorporating moving water to acknowledge the cultural significance of creeks and billabongs in the local landscape. The design creates a soundscape that evokes the former ephemeral creek line that once ran through the site.

The courtyard draws on the character of Western Sydney's ephemeral waterways, with connected pools and lush planting of ferns and other species associated with regional creeklines. This vegetation community has become rare in Western Sydney due to agricultural expansion. The courtyard provides an opportunity to reintroduce this landscape character to Country and to tell the story of the former ephemeral pond systems that shaped these creeklines.

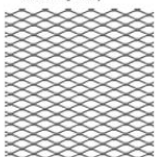
Built Form, Scale and Aesthetic

LCC raises concerns that glazing has been replaced with grills on the south-eastern façade and that the visual prominence of the timber structural system has been compromised. LCC request updated 3D visualisations to help interpret the changes to this façade.

The south-eastern corner of the southern façade is approved as masonry and metal mesh, as shown in **Figure 1** below. The proposed modification proposed masonry with ventilation slots in this location, as shown in **Figure 2**. This area was never proposed to be glazed.

The visibility of structural timber through a glazed façade remains a prominent design feature of the development, especially on the northern and eastern façades adjacent to AMRF Park and the Service Road.

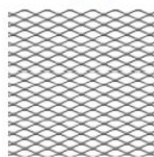
4. Sun-shading Architectural Metal Mesh
Colour: Light Grey



5. Masonry
Colour: Mix of Dark Grey, Mid Grey, Off White.



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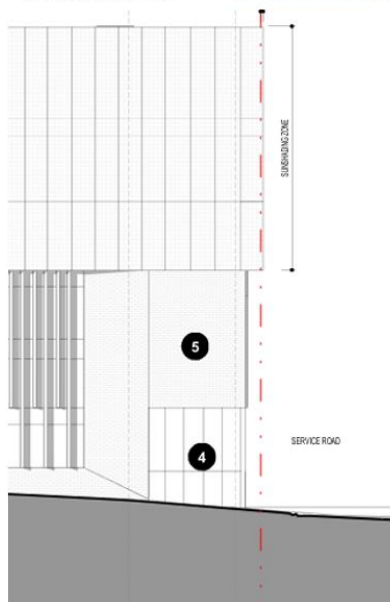
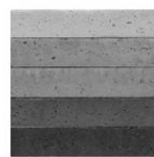


Figure 1: Southern elevation (Approved)
Source: Architectus

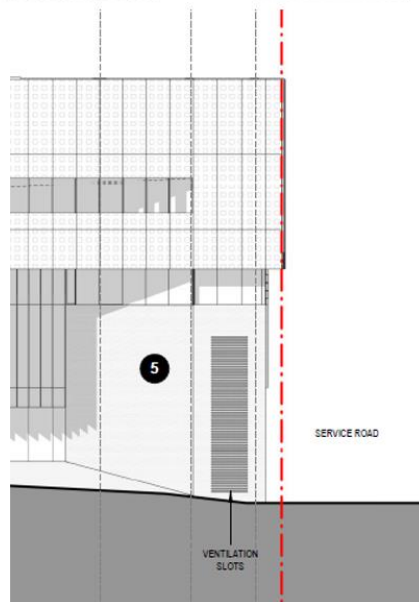


Figure 2: Southern elevation (Proposed)
Source: Architectus

Having clarified this matter, there is no requirement to request additional 3D modelling which is has a considerable cost and timeframe.

Environmental Health

LCC's Environmental Health Section identifies some matters that DPHI should consider in their assessment but raises no objection to the proposed modification.

We trust that this information is sufficient to assist DPHI to complete their assessment of the application.

Should you have any queries about this matter, please contact Abraham, Senior Development Manager BDA at abraham.cherian@bda.nsw.gov.au .

Yours sincerely,

Piers Hemphill
Associate, Planning
Architectus Australia Pty Ltd