20 October 2023

Dear Ms Judith Elijah,

I am writing to you to object to the proposed development of SSD-55844212 Triniti Lighthouse Build-to-Rent in North Ryde. I am a homeowner residing within Building B of the adjacent Ryde Gardens complex in an east-facing apartment on a lower level. I strongly oppose the proposed development for the following reasons:

Efficacy of Build-to-Rent

As I understand it, the proposed development for two Build-to-Rent buildings is intended as a solution to tackle the issue of housing availability and affordability within our state of NSW. However, I would suggest that the local area already has a large number of apartments available for rent. As at the time of writing, there are 40 rental apartment listings on realestate.com alone just for the small area of Ryde Gardens, Centrale and Lachlan's Line. These listings vary from one to three bedroom apartments, with options starting at $500 per week for rent. Appendix HH of the Triniti exhibition also mentions that the residential vacancy rate of the area is more than 1.5x that of the Sydney rate. This suggests that there is already sufficient housing supply in the area and that the location may not be best suited for further apartment development.

Existing Build-to-Rent projects in NSW have also shown that the rent charged is often more expensive than the median market price, which is contrary to the goal of creating more affordable housing in the area. Further, Lachlan's Line is already slated to be providing a 100% affordable housing option in the near future, which brings into question the necessity of Stockland's Build-to-Rent proposal.

Section 6.9 Ryde LEP

The proposed development in its current form is not aligned to the objective of the Macquarie Park Place Strategy. The current zoning for the site allows for a building base height of 37m. The proposed development relies heavily on Section 6.9 of the Ryde Local Environmental Plan 2014, which allows for increased building height and floor space ratio in order to "*encourage commercial development in Macquarie Park Corridor co-ordinated with an adequate access network and recreation areas.*"

The proposed development would fail to adequately encourage commercial development beyond the few retail spaces allocated on ground level. With the objective of Section 6.9 being to encourage additional commercial development, I believe the proposed development should be primarily geared towards a commercial rather than residential use. With only 4% of floor space having an intended commercial use, I do not believe that the development would work towards this objective, keeping in mind that much of the 4% would be open area.

With 66.8% of the workers in the area being work from home and a number of students living in the area, the site could have great potential to be developed as a place for the community to gather. This could be in the form of a co-working space, a library or a retail precinct as a way to bring vibrancy to the neighbourhood.

Section 6.9 also requires that the development allows for "*adequate provision for recreation areas and an access network*". To the point of recreation areas, the proposed development mentions public open space as their contribution. However, the public recreation areas suggested are limited to a pathway through their own retail area with five benches, a small patch of astroturf and some greenery. Adequate provision of an access network is also limited to the pedestrianisation of New Link Road, where the road already exists and thus the development is not providing any further contribution to the community with regards to access networks and is instead hampering road access. Additionally, I believe that this will contribute to increased traffic congestion in the area from the sudden increase in population and the decreased mobility by pedestrianising of a crucial road in the neighbourhood. This will be discussed below.

Infrastructure

The Macquarie Park Innovation Precinct Master Plan outlines a clear phasing and delivery plan for the Narrami Badu-Gumada neighbourhood, with the intention to develop on the six key moves of:

1. An Economic Anchor
2. A Focus of Movement
3. A Space for Culture
4. Collaborative partners
5. Connection to Country
6. Residential Opportunities

The Macquarie Park Innovation Precinct Place Strategy also highlights six big moves as key interventions, including:

- Big Move 2: 'Scale and time new development to match infrastructure delivery'
- Big Move 3: 'Rebalance transport uses'

The phasing and delivery plan are clear on its intention of developing all six key moves simultaneously to allow for the sustainability of infrastructure within the neighbourhood, which includes 225 new dwellings within Years 1-5 of the plan (Figure 1). The Stockland proposal is at odds with this plan and would create 508 new dwellings, which would bring the number of new dwellings to the volume of the Year 10 target of the Master Plan.

I believe that this would impede the progress of the other key moves due to the sudden increase in population, and in particular the Connection to Country as green spaces are further taken over by residential use. The proposed development would also not yet allow time for the Integrated Transport Plan to come into effect.

Figure 1: Phasing and delivery table for North Ryde Riverside - Narrami Badu-Gumada (Macquarie Park Innovation Precinct Place Strategy)

Phasing and delivery

Years 1-5	Years 6-10	From year 11+
New diversified employment space	New diversified employment space	New diversified employment space
Approximately 225 new dwellings	Approximately 330 new dwellings	Additional 945+ dwellings
Wayfinding and public art	Traditional custodians, engagement and delivery program	Consolidation of residential development
Regenerative Country-centred landscape management	Conversion of car parks into active uses	Further connections to Lane Cove River
	Continued environmental upgrades to the national park and routes	Roll out of 18-hour economic strategy

Loss of sunlight

State Environmental Planning Policy No. 65—Design Quality of Residential Apartment Development (SEPP 65) defines design criteria and principles that should be adhered to in new apartment buildings. The Ryde Gardens development, in which I reside, was already in the works when SEPP 65 was finalised and was bound by the same principles.

Principles 4 and 6 discuss the sustainability and amenity of the design, of which both mention the access to sunlight as a consideration. Objective 4A-1 aims to optimise the number of apartments receiving sunlight to habitable rooms, with apartments in the Sydney Metropolitan Area requiring "*70% of apartments in a building to receive a minimum of 2 hours direct sunlight between 9 am and 3 pm at mid winter*". Additionally, the Macquarie Park Place Strategy also lists a design criteria that new developments "*maximise direct solar access to adjoining properties*". While Stockland is not mandated to ensure Buildings A and B of Ryde Gardens receive an adequate level of direct sunlight, I believe that SEPP 65 presents a reasonable benchmark on apartment living.

Under current conditions, many east-facing apartments in Ryde Gardens Building B receive little to zero direct sunlight at midwinter, particularly those on the lower levels. Figures 2 and 3 illustrate the shadows cast by the Ryde Gardens buildings at sunrise to 10:15am. The proposed Triniti Building A would magnify the lack of sunlight by also diminishing the amount of indirect sunlight received.

At equinox, lower levels of Building B currently receive approximately 3 hours of direct sunlight from sunrise at 5:47 am to 9:00 am. The proposed Triniti Building A at 65M would result in a decreased level of sunlight for Ryde Gardens Building B, reducing by 81% of current conditions at 35 minutes of direct sunlight from 8:25 am to 9:00 am.

At midsummer, lower levels of Building B currently receive approximately 6 hours 45 minutes of direct sunlight from sunrise at 5:43am to 12:30pm. The proposed Triniti Building A at 65M would result in a decreased level of sunlight for Ryde Gardens Building B, reducing by 15% of current conditions at 5 hours 45 minutes of direct sunlight from sunrise at 5:43am to 12:30pm but blocked from 8:30am to 9:30 am.

Midwinter shadowing: current conditions

Figure 2: Midwinter sunrise 7:06am

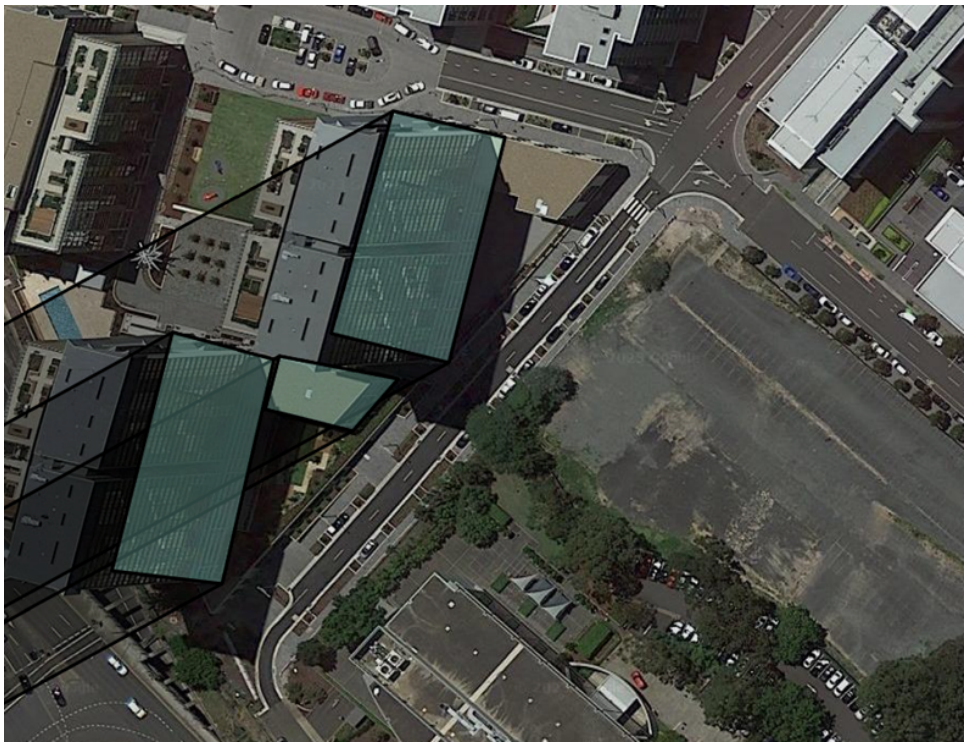
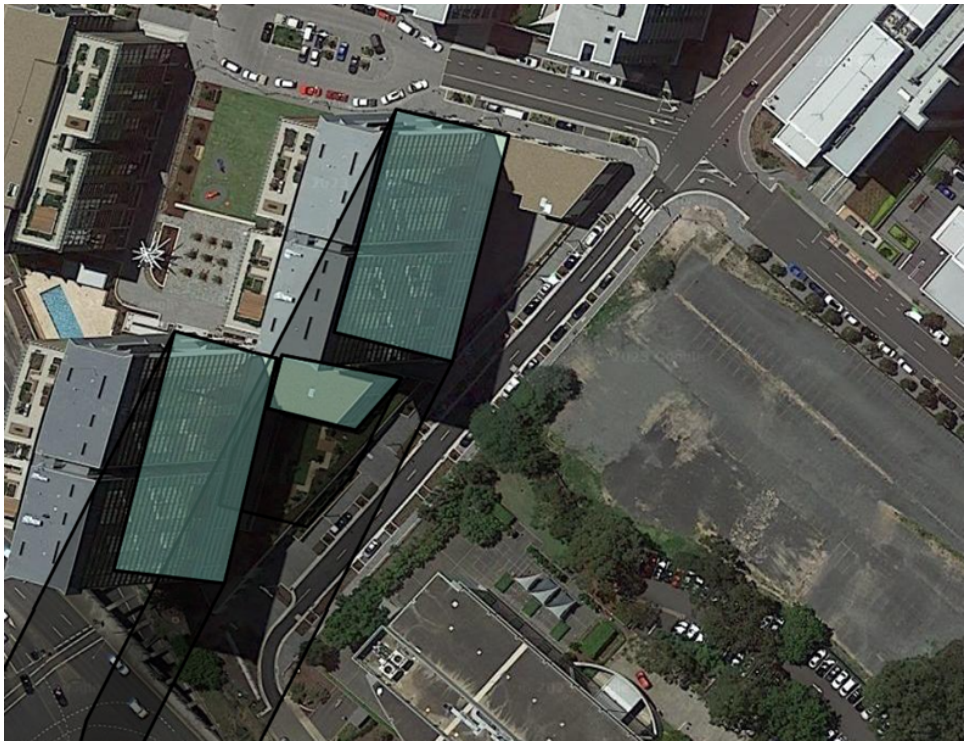


Figure 3: Midwinter 10:15am



Midwinter shadowing: Triniti Building A at 37 metres

Figure 4: Midwinter sunrise 7:06am

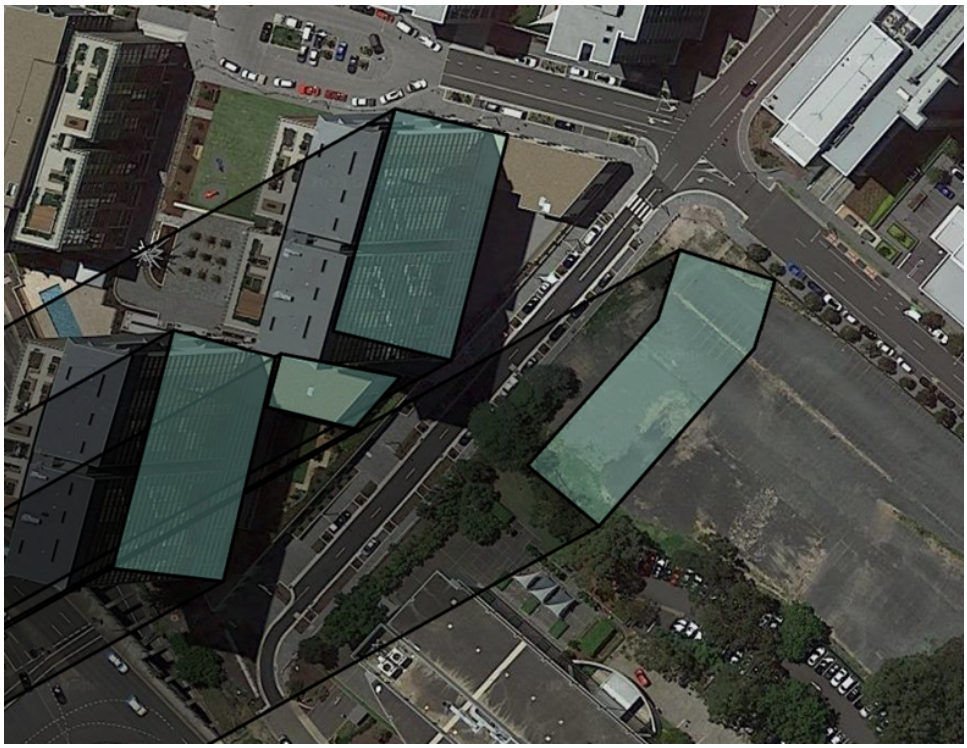
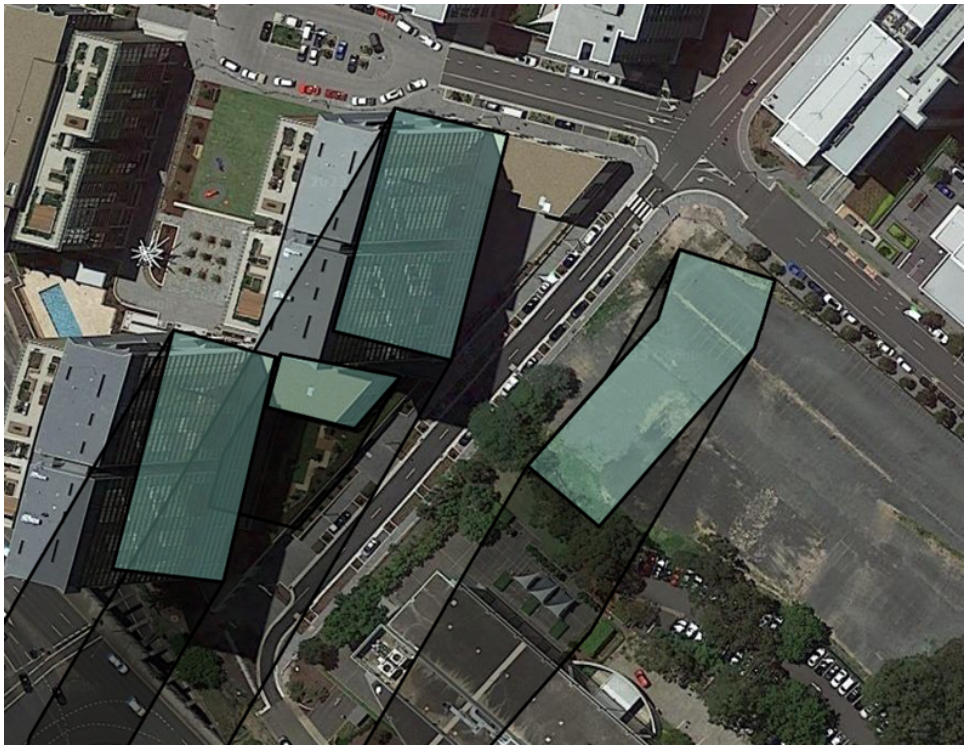


Figure 5: Midwinter 10:15am



Midwinter shadowing: Triniti Building A at 65 metres

Figure 6: Midwinter sunrise 7:06am

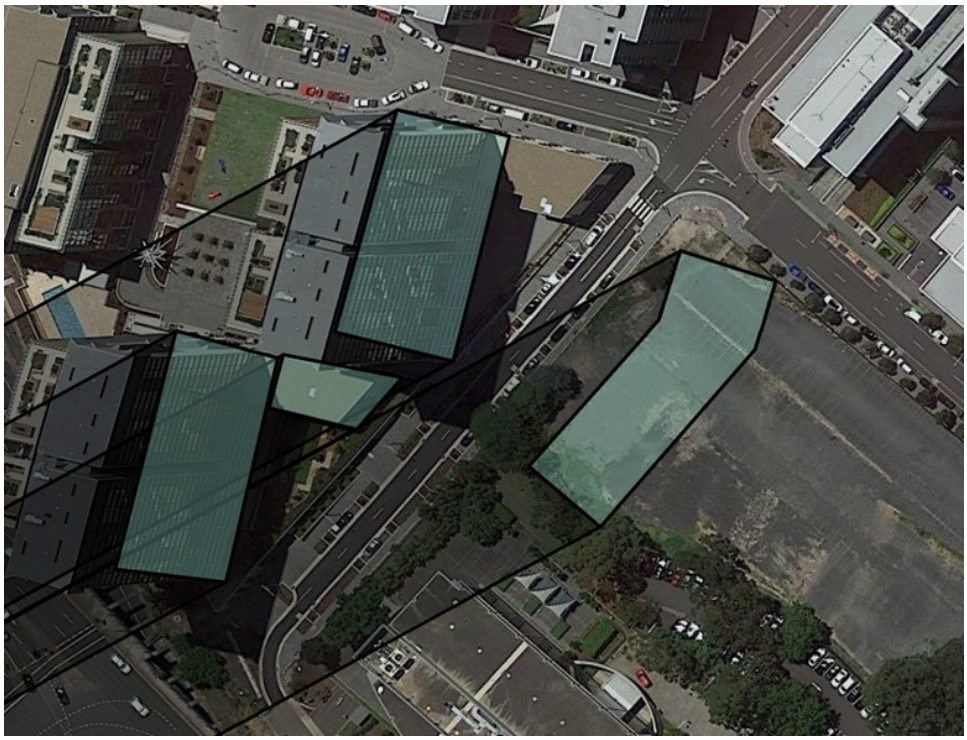


Figure 7: Midwinter 10:15am

Equinox shadowing: current conditions

Figure 8: Equinox sunrise 5:47am

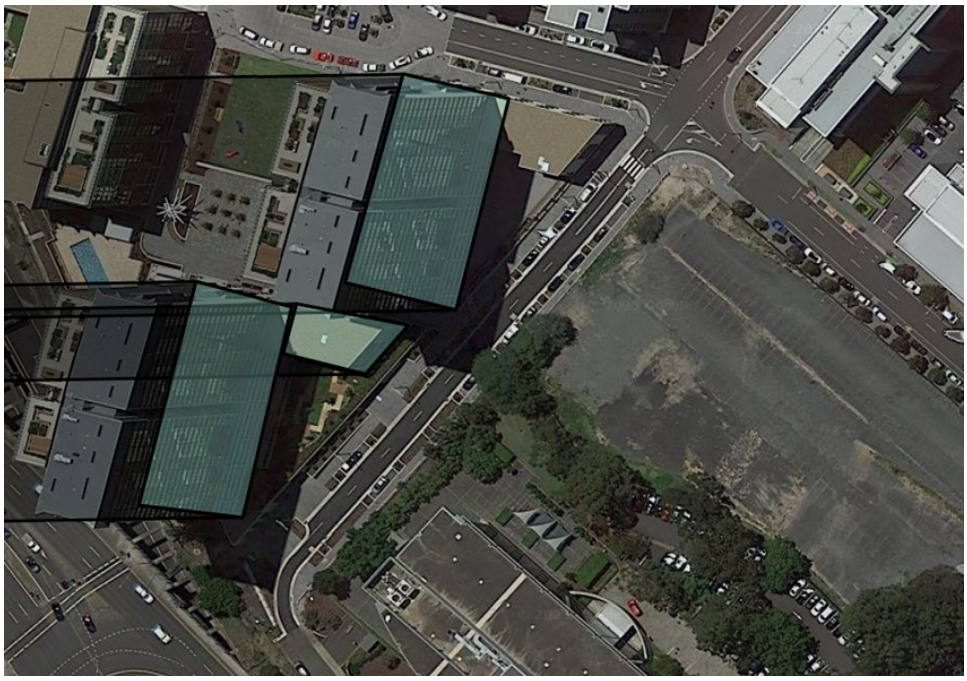
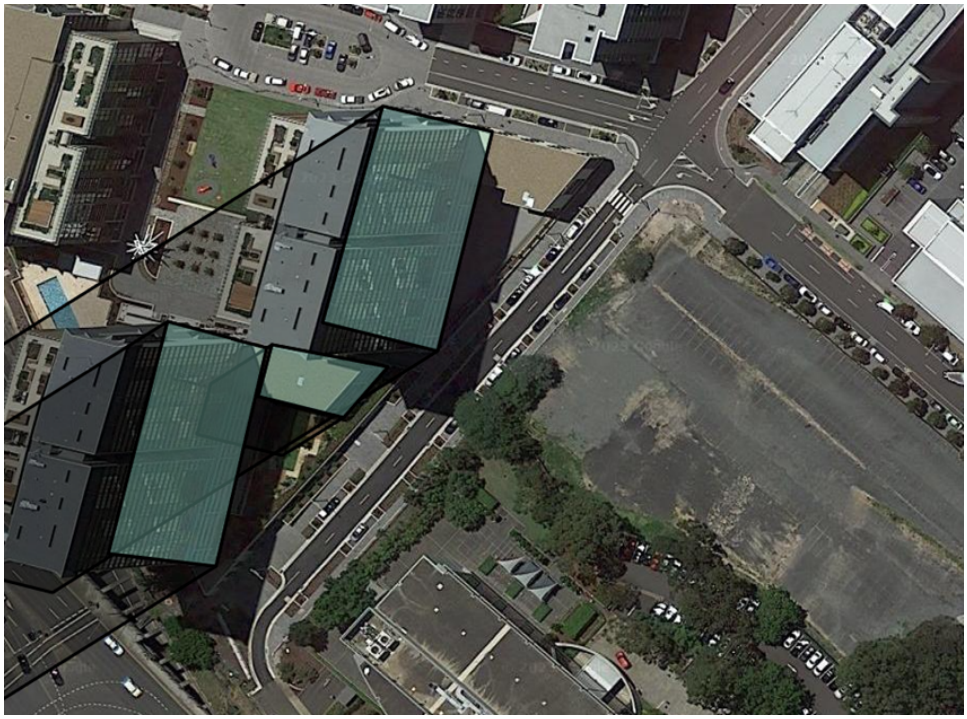


Figure 9: Equinox 9:00am



Equinox shadowing: Triniti Building A at 37 metres

Figure 10: Equinox 7:45am

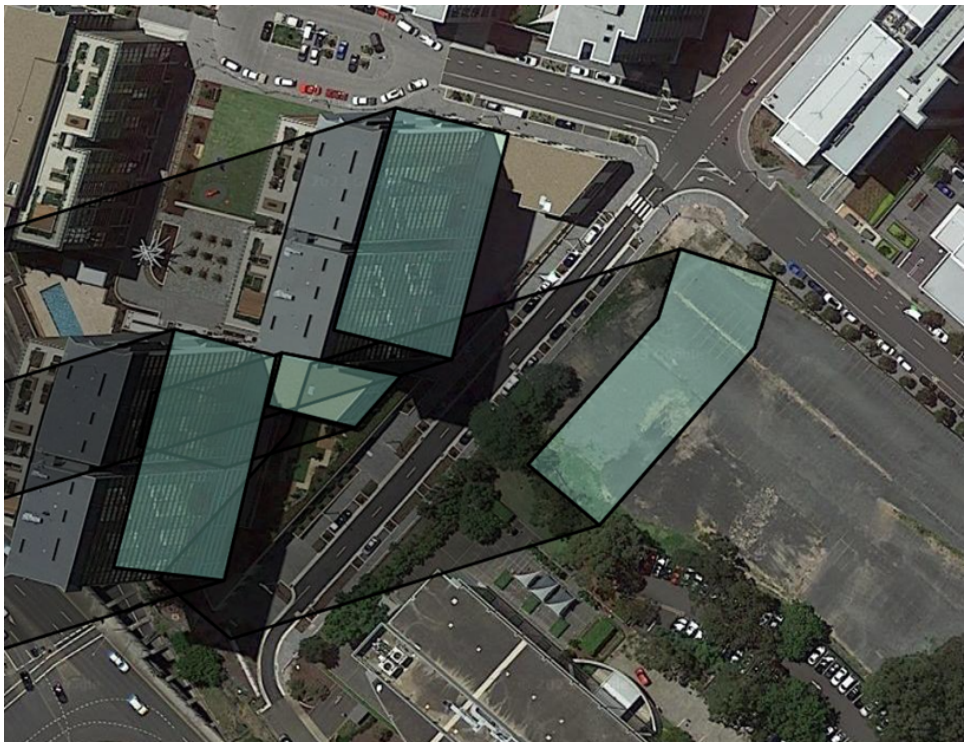
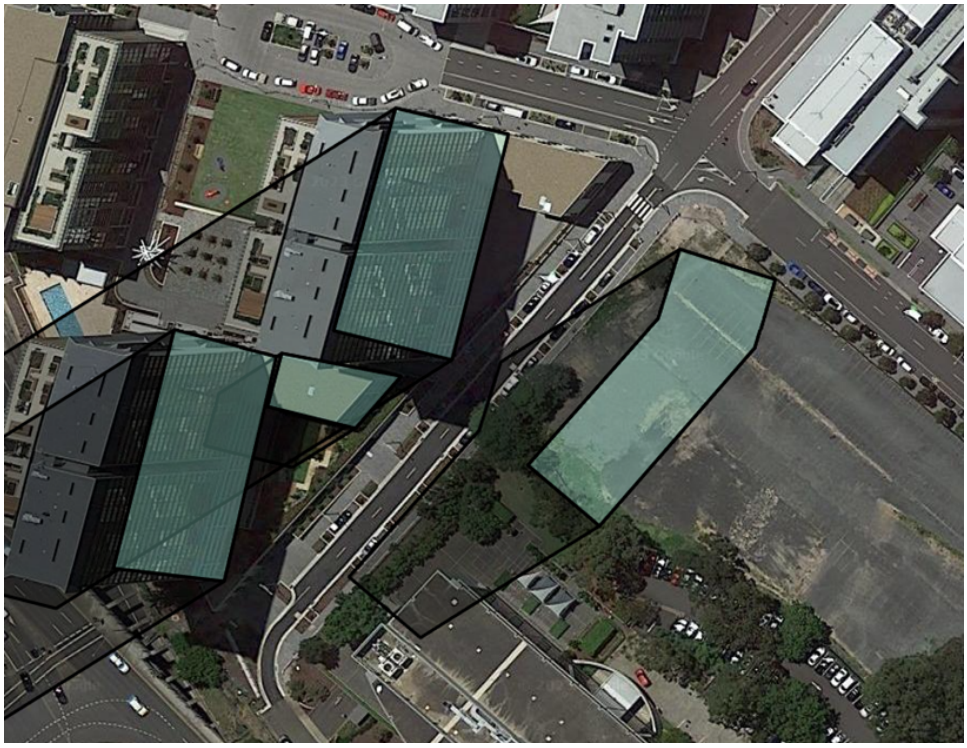


Figure 11: Equinox 9:00am



Equinox shadowing: Triniti Building A at 65 metres

Figure 12: Equinox sunrise 8:25am

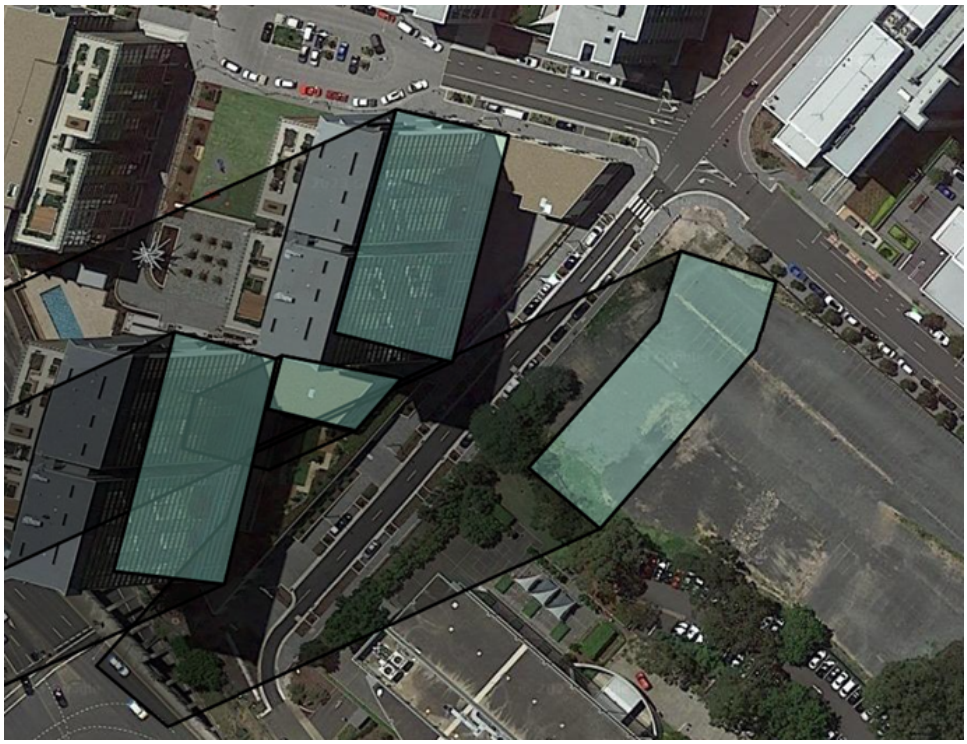
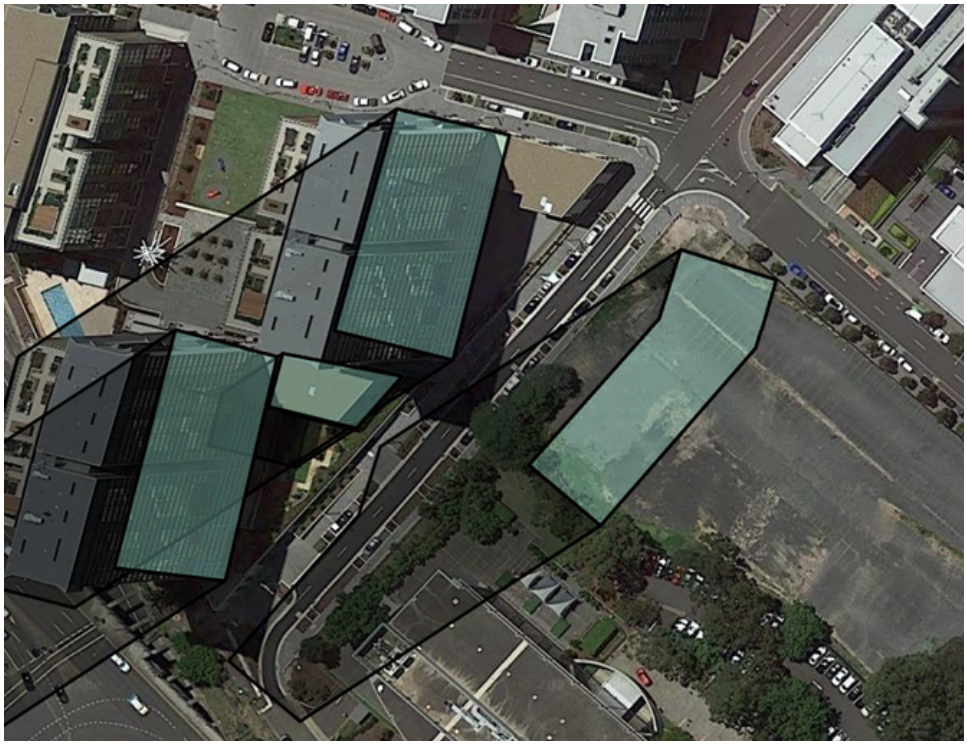


Figure 13: Equinox 9:00am



Midsummer shadowing: current conditions

Figure 14: Midsummer sunrise 5:43am

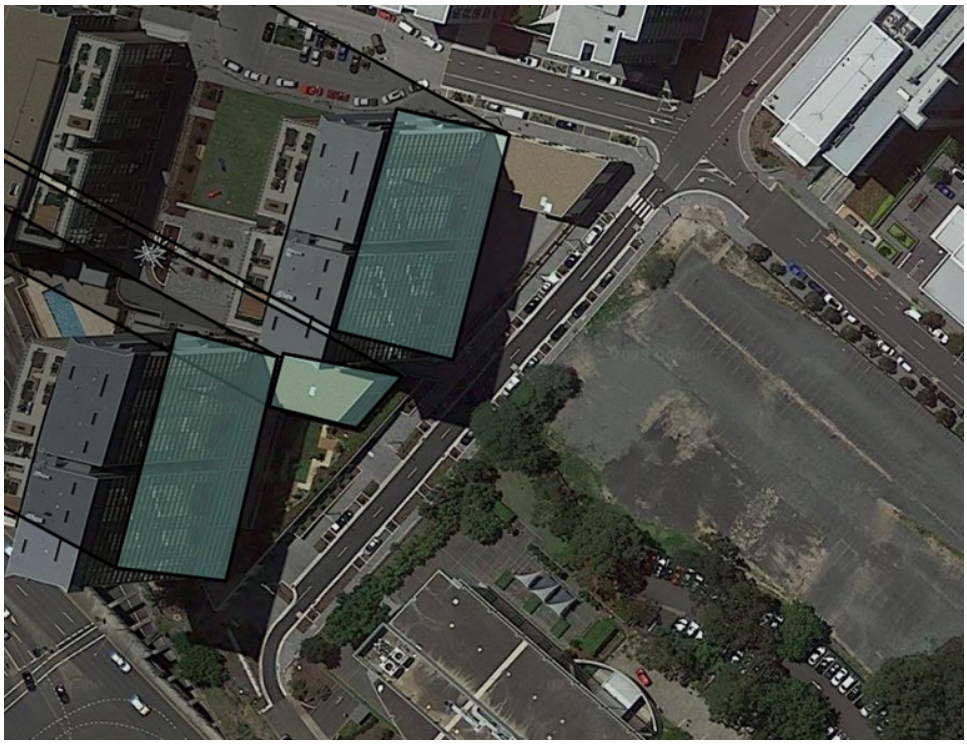
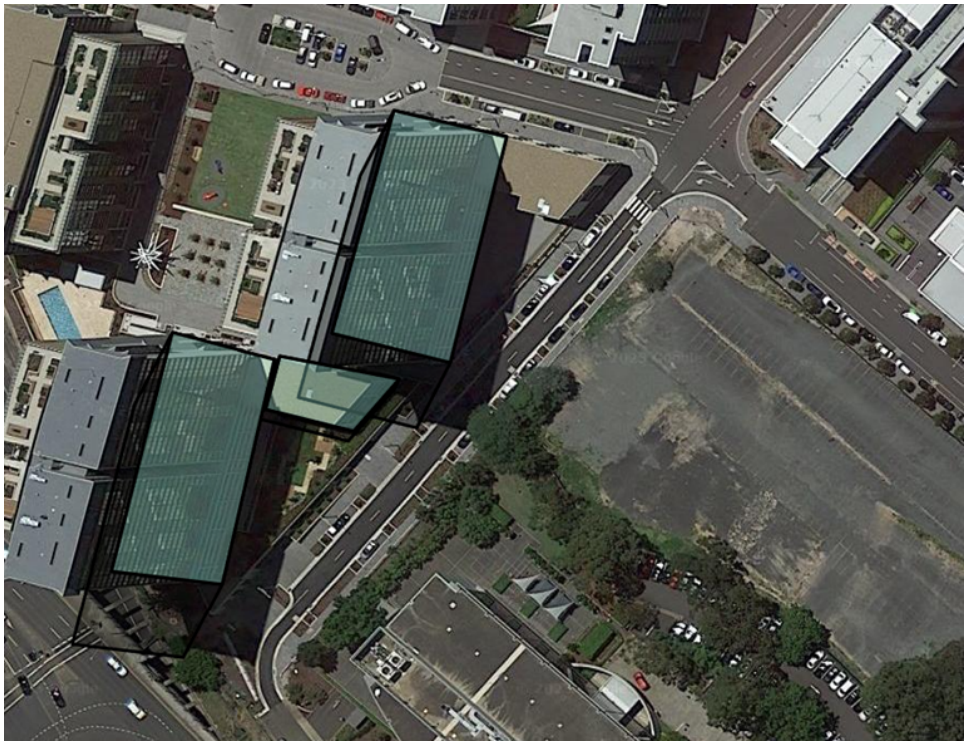


Figure 15: Midsummer 12:30pm



Midsummer shadowing: Triniti Building A at 37 metres

Figure 16: Midsummer sunrise 5:43am

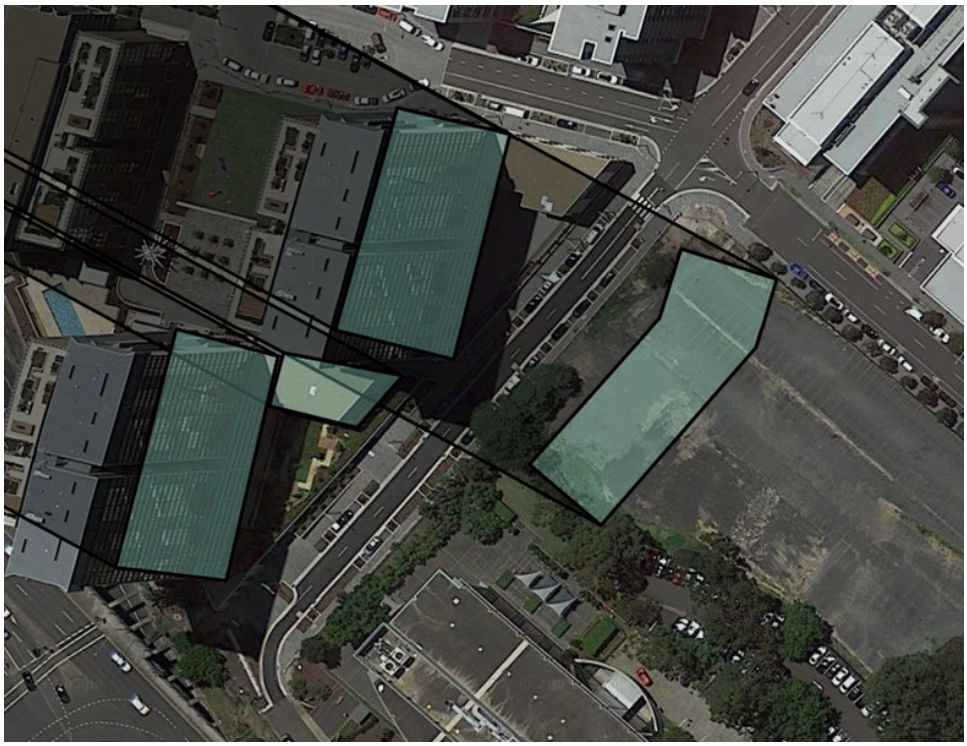
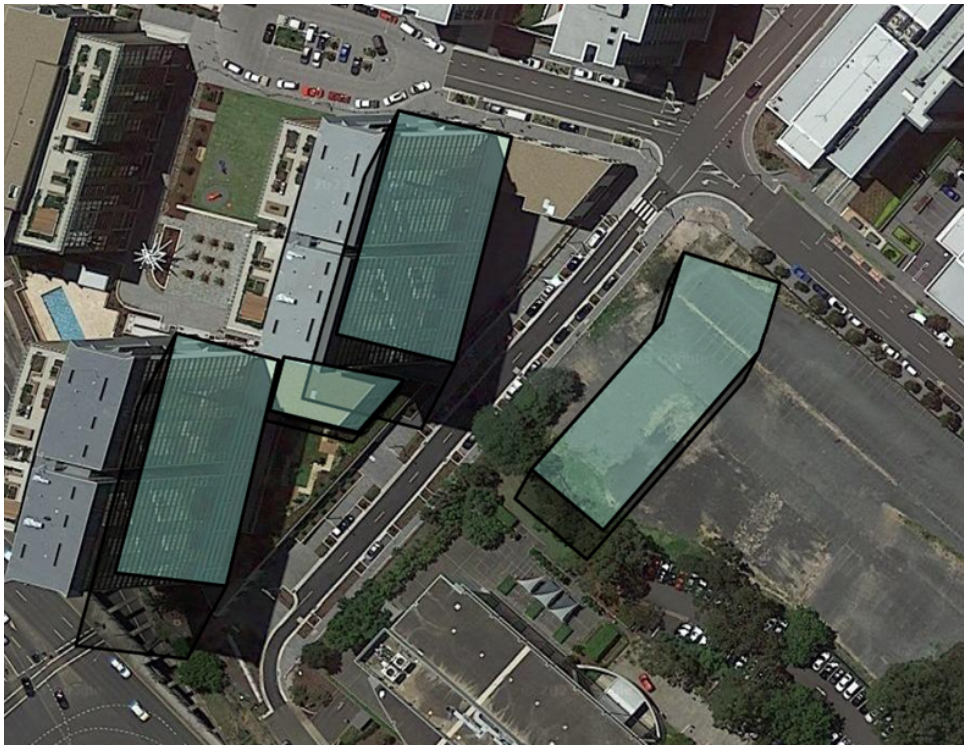


Figure 17: Midsummer 12:30pm



Midsummer shadowing: Triniti Building A at 65 metres

Figure 18: Midsummer sunrise 5:43am

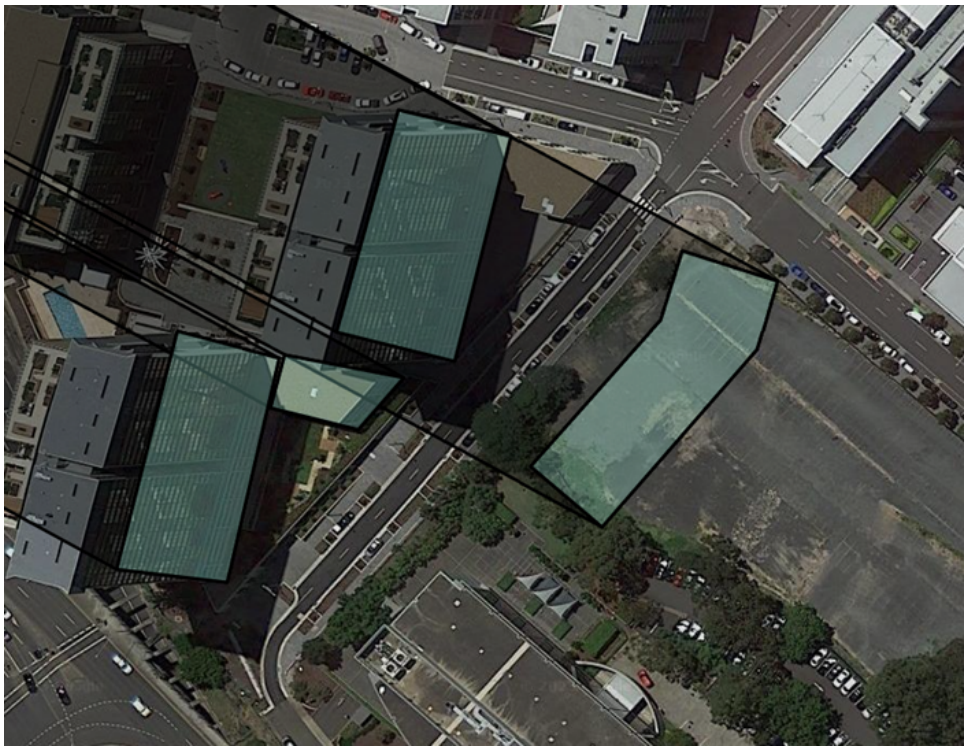


Figure 19: Midsummer 8:30am

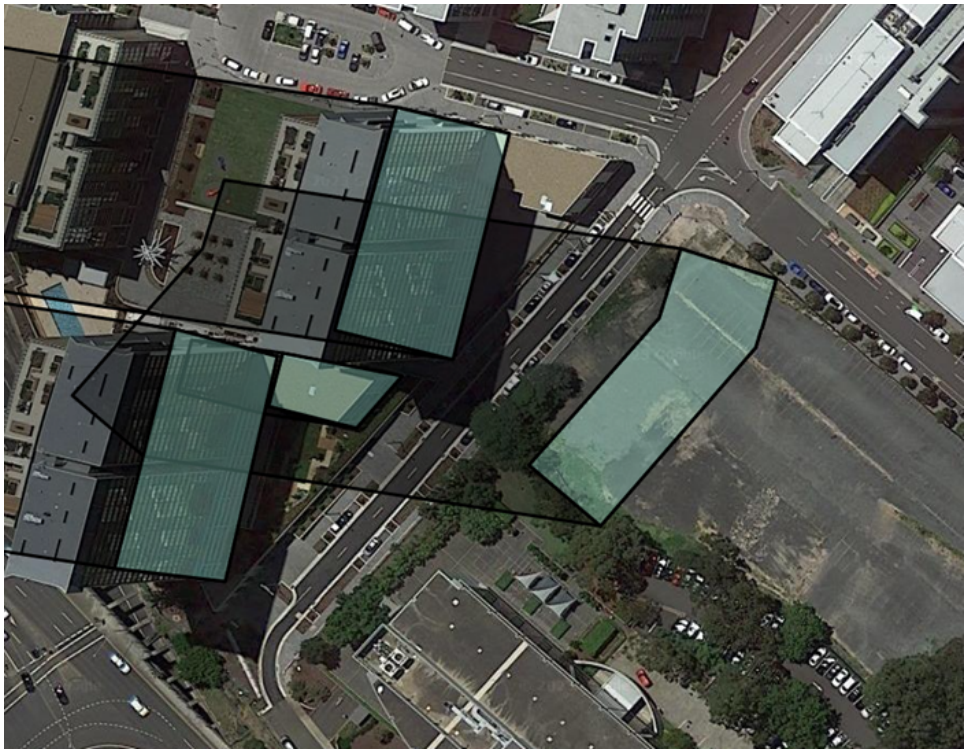


Figure 20: Midsummer 9:30am

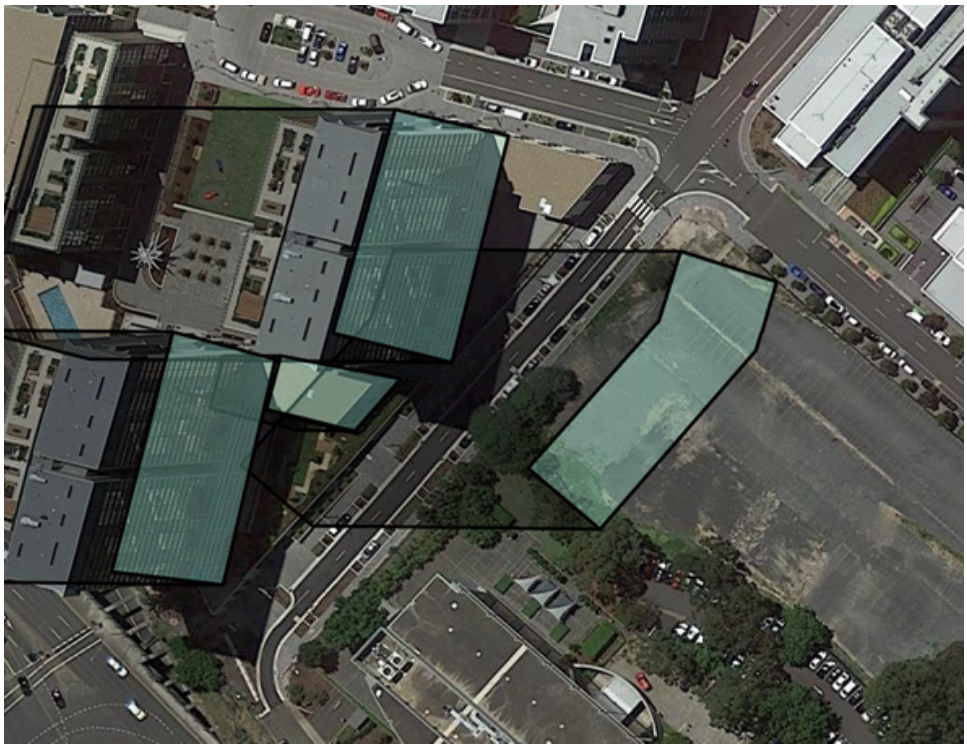


Figure 21: Midsummer 12:30pm

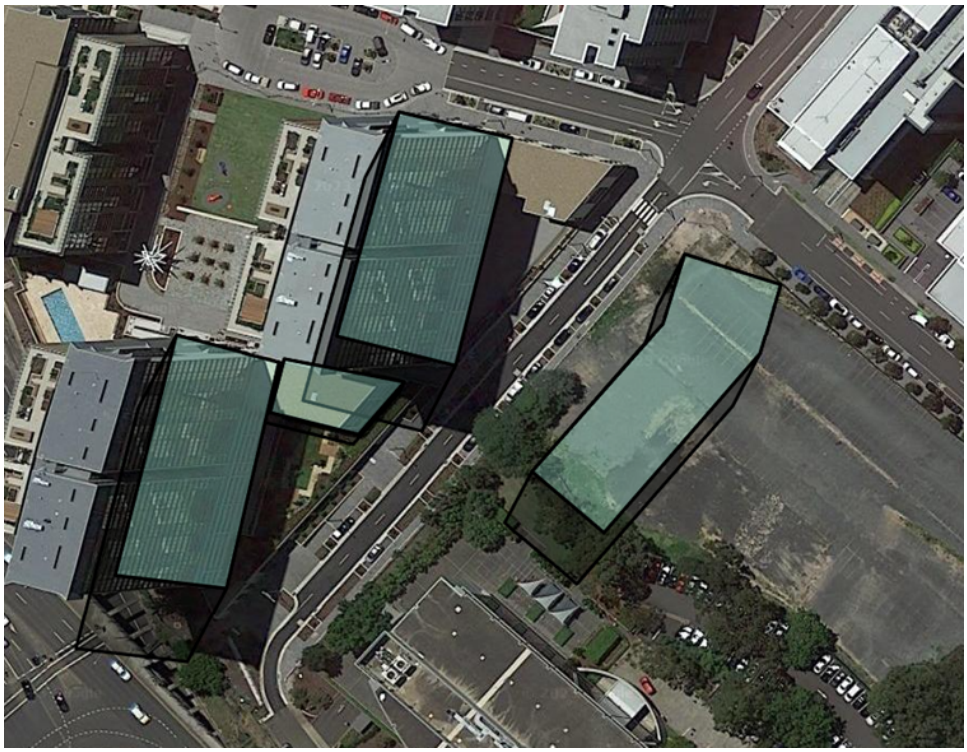


Table 1. Shadow impact summary

	Hours of direct sunlight			Percentage reduction	
	Current state	**Triniti Building A 37M**	**Triniti Building A 65M**	**Triniti Building A 37M**	**Triniti Building A 65M**
Midwinter	0h	0h	0h	0%	0%
Equinox	3h	1h15m	0h35m	58%	81%
Midsummer	6h45m	6h45m	5h45m	0%	15%

By allowing Triniti Stage 2 to be built as currently proposed, there would be significant shadowing impacts to many apartments in Ryde Gardens Building B, negatively affecting the mental wellbeing of many residents and increasing the energy consumption of many apartments that would no longer receive the sustainable heating from the sun in the early morning. The number of months with zero sunlight for these same apartments would also be significantly increased. As previously mentioned, more than half of the workers in the area are now primarily working from home. The impact of no direct sunlight is then exacerbated as workers spend longer hours at their own residence.

While Stockland submits that several design options were explored, all six design options explored in the EIS have Triniti Building A in the same position, which brings into question whether designs without Triniti Building A in the proposed position would yield better results.

Traffic congestion

The proposed development would result in an additional 155 car parking spaces and the inclusion of 164 commercial car parking spaces that are assumed to be currently underutilised. This would result in a potential 319 extra cars in the neighbourhood and in particular, on Rennie Street. During the webinar held for community consultation, Stockland informed the attending community members that all parking would be via Rivett Road rather than Rennie Street. However, the EIS now mentions that all residential parking would be via Rennie Street, or Rennie Street turning onto New Link Road while only retail parking would be via Rivett Road. In addition to this, the drop off bay for the Triniti development would also be on Rennie Street, increasing the number of moving vehicles on this road from rideshare, food delivery or package delivery services. This poses an increased risk of traffic congestion on Delhi Road and Rennie Street, particularly during peak hour traffic.

The traffic impact assessment outlined in Appendix P suggests that the Delhi Road and Rennie Street intersection currently represents a good level of service, with "*average delays of less than 15 seconds per vehicle during weekday morning and afternoon peak periods*". However, the assessment neglects to study the consistency of the traffic volume across the peak hour periods. My personal experience is that the traffic volume is markedly increased during the hours of 8am to 9am and 5pm to 6pm, particularly in the turns from Delhi Road onto Rennie Street. The study was also undertaken on 2 May 2023, which is only one week after a public holiday, where many people may still have been away on holidays.

The "*good level of service*" presented in the traffic impact assessment groups together all traffic running through the Delhi Road and Rennie Street intersection but does not distinguish the delays between traffic continuing eastbound/westbound and traffic turning from or onto Rennie Street, where the traffic volume of the latter would be increased significantly with the proposed development.

In particular, the busiest periods of peak hour traffic today already present difficulties in turning onto Rennie Street. Eastbound traffic on Delhi Road turning onto Rennie Street often results in long delays, especially as the intersection is often queued over from traffic travelling westbound. There may also be flow-on effects of increased traffic volume turning onto Rennie Street if the queue length exceeds that of the turning bay and queuing cars block access for cars continuing eastbound. Meanwhile, westbound traffic on Delhi Road aiming to access Rennie Street can often avoid traffic congestion by turning off early onto

either entrance of Julius Avenue. However, the proposed pedestrianisation of New Link Road would render this impossible. In addition, losing vehicle access to New Link Road would also remove the option of returning home via the slip road on Epping Road opposite Pittwater Road and residents would be forced to turn back onto Delhi Road and add to the congestion there.

Lack of parking

The proposed pedestrianisation of New Link Road would remove street parking that is currently enjoyed by residents and office workers. It would also create difficulty for those dropping off and picking up their children from the child care centre on New Link Road, particularly as it is often not convenient for young families to travel to child care on alternate modes of transport.