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COMMENTS ON CITY OF SYDNEY STRATEGIC PLAN DEVELOPMENT
CONTROL AND FLOOR SPACE RATIO CODE

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1. CHAPTER'S EXISTING POLICIES

The detailed study which this subject requires is not possible in the limited time available and we are, therefore, obliged to confine ourselves to general comments, many of which we have made before. In this connection, we should refer to some comments submitted by Chapter in November, 1969 to the Minister for Local Government on the subject of Floor Area Ratios in the City of Sydney. At that time, the State Planning Authority was proposing amendments to the existing ratios, and Chapter was able to study their likely effects in more depth than is possible at present. Although the specific proposals of the Authority were quite different and even contrary to those now being put forward by the City Council's consultants, we find that they elicited from Chapter statements of principle which are still highly relevant to the current proposals, and we therefore quote or adapt pertinent extracts from our 1969 Report as follows:

Site consolidation is not always desirable as an end in itself.

Unfortunate effects which may result from the implementation of the Code include:

The provision of setbacks and arcades of dubious value in some locations, and the failure to provide them in locations where they are needed.

Unjust discrimination against owners of small sites which, because of their location, cannot be amalgamated with other sites.

The unnecessary destruction of many buildings.

The present CBD working population is in the order of 240,000 people: this population appears to stretch present facilities almost to their utmost. The State Planning Authority predicts (in the Sydney Region Outline Plan) that the current trend, if unchecked, may result in a rise in working population at the centre to a level of nearly half a million. It appears that the regulations as proposed will allow the increase which the Authority forecasts, and will not achieve the objective of reducing the density sufficiently to solve the transport problem.

The proposed Code, which is essentially directed at producing office towers of low site coverage on large sites, will in no way be appropriate for redevelopment which might continue existing land uses.

The effect of the Code on small sites will be very severe. Site amalgamation will become essential to the economic viability of a redevelopment scheme. Yet it will not be possible for some small sites to be amalgamated, because of existing developments. While in a great many instances this might be desirable, the interest and diversity of the urban scene lies in the contrast between buildings of various ages and sizes. To hasten, unnecessarily, the destruction of old structures in the city, or even buildings of the immediate pre- or post-war periods, would seem very undesirable. It is also uneconomic, particularly in relation to the overall demands of the community, in a building industry which is already strained. The great size of a new building, while undoubtedly assisting the large scale developer to increase his profits, is not necessarily in itself of benefit to the city. There are areas where the amalgamation of building sites can be of great benefit to the city, but there are many others where the existing pattern of subdivision and land ownership is responsible for a diversity of activity and visual character, the preservation of which should be encouraged, not destroyed. Thirdly, the resultant development will all tend to have the same form (of which Australia Square could be described as typical). This form is often suitable for office building, but not necessarily for buildings primarily acknowledged for retail, wholesale, or other uses, activities which should probably be encouraged by city planning ordinances. Further, however desirable Australia Square might be, in its present context, it must be appreciated that much of its contribution to the urban scene lies in its contrast with surrounding development. The space, which is Australia Square, is partially formed by surrounding buildings rising from conventional street alignments. This space would lose the particular value that it now has if similar developments were to occur on adjacent sites. It will also become exposed to very undesirable wind.

?? It is not appropriate to argue the virtues of environments consisting of towers surrounded by open space as opposed to those formed by the traditional street, except to point out that a code applicable to a wide area should not attempt to force upon the city either one or the other form of environment. This characteristic of the proposed code is perhaps the worst of the positive effects it will have. In order to make economic use of his land, the developer will be forced to setback from the street alignment, which, in many cases, will destroy the very thing that is giving the street its particular urban character. On the other hand, however, a setback which contributes to the creation of a significant punctuation to the street pattern can be of immense value to the city. It is essential, however, that such setbacks be either planned or considered on their merits in the light of stated policy objectives, and not be allowed to happen at random.

It is only after the necessary research has been carried out that a meaningful plot ratio system might be produced, wherein (a) different building types (i. e. retail, commercial, wholesale, residential) have different plot ratios and bonuses, commensurate with their traffic generating characteristics, (b) combined uses can be added with their respective bonuses to the benefit of both the developer and the city, (c) certain areas of the city can have particular plot ratios and bonuses to, where necessary, bring about a variety of benefits to the city such as -

- new traffic routes
- parking stations
- open space
- shopping and restaurant facilities in working areas
- additional pedestrian circulation
- connections to rapid transit, etc.

Chapter's support for a Code would be subject to conditions, for instance:

That it is recognised that the only way to achieve the objectives is by comprehensive planning which will determine where pedestrian routes and open spaces are to go and will make positive proposals rather than impose negative restrictions.

That the proposals will take into account a wide variety of benefits for the city, to include the retention of buildings of architectural and historic value.

That small sites should not be unduly penalised by the adoption of measures which only suit large amalgamations of sites.

In restating these principles we are not necessarily implying that they have been ignored in the current proposals, as to which it is more a case of 'where the cap fits'. The main object here is simply to state what Chapter's attitude on certain important issues is and has been for some time.

2. RESTATEMENT OF VIEWS ON URBAN PLANNING

On 20th January this year Chapter wrote to Alderman Briger, at his request, giving our views on matters of urban planning which might be useful to the consultants in their preparation of the Strategic Plan. Many of these opinions are relevant to the question of the Floor Space Ratio Code and will bear restating below. Before doing so, however, we should register a protest against the erroneous and misleading way they have been quoted in the Strategic Plan itself (on page 17). For instance, the first quote is not from our letter at all and makes a statement, about the capacity of the city to accommodate more people, which is contrary to any evidence we have seen, and from which we must therefore be clearly dissociated. The second last quote omits the words 'cannot be achieved by bonus codes, but' without indicating

the omission, and thus appears to support what we were at pains to reject, namely, the consultants' proposal to create colonnades by bonuses instead of by mandatory three-dimensional control plans.

The relevant passages from our letter of 20th January are as follows:

The effects of overshadowing, sunlight and protection from wind should be studied, particularly in connection with public or semi-public open space. Regulations which encourage plazas should also take the above factors into account.

It should be the prime aim of planning to make the most intensive use possible of available resources, subject to agreed standards of amenity. City land is the most valuable of a city's resources, and the only one which can't be manufactured. At present, the city's transport and circulation system, according to the S.P.A., is threatening to limit the intensity of land use within the city. As Chapter has had occasion to point out to the S.P.A., if this is true, the answer surely is not to impose arbitrarily reduced plot ratios, but to improve transport and circulation. However, this will require a degree of overall planning control which simply doesn't exist at present.

Chapter has always supported, and still supports, the principle of providing colonnades to the street frontages of city buildings, but the regulation which sought to encourage them has failed to create the intended result. The colonnades are there, but they seldom provide the continuous covered extension of the footpath which is surely their prime purpose. Different building setbacks mean non-alignment of adjoining colonnades; very often the colonnades terminate in a wing wall at either end; vehicle crossings and basement vehicle ramps interrupt the continuity; and the pavements of the colonnades are seldom at footpath level, and frequently are cut off from it by barriers such as garden walls or planting boxes. The very desirable objectives of increased areas of useable paved surface and continuous under-cover access cannot be achieved by 'bonus' codes, but require mandatory three-dimensional control designs for the street frontages of all new development in streets where the colonnade principle is to be applied.

The techniques of control designs or 'envelope' codes could also be used to co-ordinate the form of development of adjoining small sites in cases where site amalgamation is either not feasible or not desirable.

Comprehensive redevelopment of large amalgamated sites is not the only solution, and preservation of Sydney's character will depend to some extent on the retention of areas of small-scale development.

Concern is felt for the present tendency towards erosion of diversity in the city through loss of major retailing shops, department stores and cinemas to more and more office space. Perhaps this could be corrected by floor area bonuses for such uses in certain areas. Residential accommodation within the city should also be encouraged. The Central Urban Committee of the Chapter has produced a report on this subject, a copy of which has been handed to the Strategic Planners.

3. GENERAL COMMENTS ON THE PLAN

The Chapter has on a number of occasions commended the Sydney City Council for its initiative and foresight in commissioning the Strategic Plan, and we would not wish any criticism we may offer here to be taken as diminishing in any way our support for the principle of comprehensive planning which the Plan embodies. On the contrary, as will appear, our greatest fear is that this principle is being compromised at the outset by pressures external to the Plan. As for criticism of the Plan itself, it is to be expected that a commentary such as this will dwell on what we see as its defects, and say too little about those parts with which we agree. For this we apologise in advance.

This having been said, we must now express our concern at the way the Plan appears to be already endangered by events. The Plan itself calls attention to the very limited control that the City Council has over the systems that make up the City; for instance, utilities, transport, parking traffic, high buildings, State and Commonwealth property, maritime services, etc.; and, as the planners rightly say, this confused administrative machinery requires modification so that Council's policies can be put into action. All this is serious enough, but when one comes to consider floor space ratios, one is immediately struck by the fact that key areas of the city have been or are about to be removed from the ambit of the plan, either through being placed under the planning control of a separate redevelopment authority, as in the case of the East Rocks, or through the direct intervention of the State Government, as seems likely to be the case with Woolloomooloo and the Pymont Trade Centre project. In all such cases comprehensive planning in the city-wide sense goes by the board, and the only things one can predict with certainty are that the type and density of each separate development will be geared to the maximum economic return. One can admire the ingenuity of the planners for the Sydney Cove Redevelopment Authority in packing incredible densities on to the southern portion of the East Rocks scheme, but it prompts several questions. Does it conform to the maximum Floor Space Ratio of 14 proposed by the strategic planners for Precinct A1 (into which it falls); and, if so, is this the sort of density we want to see throughout Precinct A1? If not, the premise on which the FSR for the precinct was based is falsified from the start by the Rocks scheme.

not true!

Similarly with the Londish scheme for Woolloomooloo. The density proposed for the Central Spine District is derived from a premise stated in Action Priority 2B of the Strategic Plan, namely, that the increase in total CBD workforce would be wholly contained in the Central Spine precincts. This in turn rests on assumptions, upon which the whole plan is based, that the CBD workforce could increase up to 400,000 by the end of the century and that transport and services will somehow be improved or enlarged to keep pace (page 69). We seriously question the wisdom of basing a city plan on unfounded assumptions of such a fundamental character, which, if they prove mistaken, will result in worse over-development and congestion than we have at present. Be that as it may, the whole edifice of assumptions will assuredly be in ruins if the Woolloomooloo scheme goes ahead, since it will spread the CBD workforce into that precinct, contrary to the Plan recommendation for predominantly residential use therein.

As for the Trade Centre in Pyrmont, the Plan mentions it as a possibility, but we doubt whether its potential effect on workforce distribution, transport, etc. can have been considered in relation to Floor Space Ratios in the Central Spine District.

Similar doubts are raised by the William Street Boulevard Action Plan. Under the proposed Code for Precinct B2 the commercial FSR can be as high as 5.0, which hardly seems to be compatible with confining the workforce growth to the Central Spine. And one suspects that even higher FSR's are likely to eventuate.

To sum up, we fear that the Floor Space Ratios proposed will be too high, especially in the central areas; that they have been based on premises that do not appear to be well-founded; that, in any case, the assumptions have been or are being rendered obsolete by uncontrolled events; and that the result may be over-development and worse congestion in the city.

We doubt whether the subject has been sufficiently studied. What is required is a series of studies of hypothetical developments on typical sites in each precinct; Chapter has had neither the time nor the resources to do this, but it should be done, preferably by the consultants, before final decisions on FSR's are made.

It may perhaps be argued that, since so much unco-ordinated development is about to occur anyway, detailed research is a waste of time, because optimum FSR's can never be established with precision. This is an indictment of the state of planning in New South Wales; but, if true, it can only lead to the conclusion that FSR's in the areas under Council's control should be held down to compensate for the excesses in the uncontrolled areas. In other words, maximum permissible ratios of 14.0 are far too high.

4. INCENTIVES

The reliance on bonuses we find suspect in most cases. Density in any particular area should be fixed in relation to accessibility (movement of people and goods), capacities of other services, desirable building form (especially height) and desirable properties of open space. These factors place an objective limitation on density. If bonuses permit this limit to be exceeded, they are lowering the amenity of the area. It is no justification to say that the bonuses are given in return for other benefits. The other benefits, if necessary, should usually be sought by other means. (Colonnades, previously mentioned, are a case in point).

Bonus incentives do not ensure something for nothing. It is fashionable to suppose that by giving away the right to build extra floor space we can get things like open space and pedestrian throughways free; but this is a fallacy. The city pays in overshadowing, unpleasant wind effects and inadequate transport and services, and gets in return space which is often unplanned, badly situated and useless. The consultants effectively concede the force of this argument by their reference to 'the otherwise detrimental effects' of bonuses (page 16 of the Code proposals).

Bonuses are necessary only where the desired development would not otherwise take place for economic reasons. A case in point is the transfer of bonus floor space from the site of an historic building to another approved site (Action Priority 13D). We support this as being probably the only practicable way of ensuring the preservation of listed buildings in a redevelopment context. In most other cases, however, the objective can be attained by mandatory requirements, justified by genuine three-dimensional planning. To offer a bonus and then wait to see what turns up is the lazy planner's solution.

5. MAINTENANCE OF PUBLIC FACILITIES

(Action Priority 3B). We would ask how Council is to ensure that public facilities or amenities, for which bonuses have been given, will in fact be maintained by the developer, free of cost to Council?

6. OPEN SPACE

(Action Priority 15D). What are 'approved plazas'? Private sites are not appropriate locations for the placement of open space which is at the foot of high towers, in shadow, and windswept. There may be exceptions where the private site is very large, but the minimum of 20,000 sq. ft. proposed on page 20 of the Code is not nearly large enough in relation to the usual city tower. Tower-plaza development on larger sites, on the other hand, should not be allowed to occur wherever developers happen to consolidate a big enough piece of the city, or fragmentation of the townscape is likely to result. Major plazas ought to be planned comprehensively, in other words; and for the most part they should be on land under public control. Malls created by street closures should be prime objectives.

If open space on a private site is to be given an incentive, it should be on the basis that the minimum dimension of the space and the height of the building have a specified minimum ratio, so that small spaces may qualify if associated with small buildings. The ratio should be related to sunlight requirements; something more specific is required than 'be open to sunlight to the satisfaction of Council', (page 20). If a Code can't do better than that it ought to say nothing at all.

7. CONTINUOUS RETAIL FRONTAGES (MIDTOWN PRECINCT)

Action Priority 10A says that these shall be required, and we strongly agree with this; but it hardly seems as if it will be achieved by the frontage requirements as stated on page 26. 25% of the frontage can be Commercial Premises; the whole of the remainder could be 'plaza or terrace'. Not much continuous retail frontage in that.

8. DEFINITIONS

What is a 'public place readily accessible to the public'? (page 6). This is the sort of definition that leads to disputes. The same can be said of those areas under 'Landscaped Open Space' on page 8 which may be included in the definition if Council 'deems such to be readily accessible' etc. How is a designer to know what Council will or won't 'deem'? The onus is on writers of Codes to come up with better definitions than this or leave them out altogether.

Does a Professional Consulting Room have to be 'fully equipped with plumbing facilities' (page 10) whether these are necessary or not? This is open to abuse of interpretation.

Are town houses in rows Dwelling-Houses (page 7) or Residential Flat Buildings (page 10)?

9. MEASUREMENT OF TOTAL FLOOR AREA

On the whole we are inclined to reject the BOMAA contention that only 'net' floor area should be measured, mainly on the ground that 'net' measurement would probably be too much open to abuse. In saying this we are aware of quite attractive arguments on the other side, including one that we have not seen used in this context before. The Intelligence Unit of the Royal Institute of British Architects has raised it in a report on conservation to the British Government's Department of the Environment. The conservationist attitude to multi-storey framed buildings (if not to all buildings) should be that it must be madness, taking the long view, to plan them for obsolescence so that they must be torn down in 50-year cycles or less. Structurally they will last virtually for ever. It is the services which wear out and become obsolete, mechanical services in particular. Buildings should, therefore, be planned with generous service spaces in the form of vertical ducts and sub-floor spaces, so that new services, even those at present unthought of, can be threaded through from time to time with the minimum of difficulty. It is an attractive idea; but for translation into reality it requires a revolution in such things as building financing and taxation concessions, as well as a liberal net measurement formula. Until the revolution occurs, measurement formulae should bide their time.

good point