

G. CLARKE'S  
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THE PROCESSES OF STRATEGIC AND ACTION PLANNING,  
AND OF DEVELOPMENT CONTROL, INITIATED BY THE  
COUNCIL OF THE CITY OF SYDNEY

OK - correct: -  
see p 2 ✓ OK

ADDENDUM  
ERRATA

29. 11. 72

Add to Glossary of Abbreviations: -

DA Development Application

RPAH Royal Prince Alfred Hospital

AP Action Priority

Page 2, Paragraph 4, 4<sup>th</sup> line: <sup>for</sup> "out" <sup>read "our"</sup> should  
"n", "n" <sup>3<sup>rd</sup> line</sup> 6<sup>th</sup> line: <sup>for</sup> "from a well considered" <sup>read "firm and well considered"</sup>

Page 13, Paragraph 41, 3<sup>rd</sup> line: reverse positions  
of "2,500 sq ft" and "1,500  
sq ft."

REPORT TO THE STATE PLANNING AUTHORITY BY  
ALDERMAN LEO PORT, BE, FIE AUST, M CONS E AUST,  
REPRESENTATIVE ON THE AUTHORITY OF THE COUNCIL  
OF THE CITY OF SYDNEY

NOVEMBER 17, 1972

## GLOSSARY OF ABBREVIATIONS

ANTA	The Australian National Travel Association
BOMA	The Building Owners and Managers Association
CBD	Central Business District
CCS or The Council	The Council of the City of Sydney
City	The area within the boundaries of the Council of the City of Sydney
COSPAC	The City of Sydney Parking Advisory Committee
CSBD	The Central Spine Business District of the City of Sydney
CSP	The City of Sydney Strategic Plan, as adopted by the Council of the City of Sydney on August 2, 1971.
CSSPS	The City of Sydney Statutory Planning Scheme, as gazetted on July 16, 1971.
CUMTAC	The County of Cumberland Passenger Transport Advisory Committee.
DA	<i>Development Application</i>
DMR	The NSW Department of Main Roads
FSR	Floor Space Ratio
HOBAC	The Height of Buildings Advisory Committee
PTC	The Public Transport Commission of NSW
RAIA	The Royal Australian Institute of Architects (NSW Chapter)
RAPI	The Royal Australian Planning Institute (NSW Division)
RPAH	<i>Royal Prince Alfred Hospital</i>
SATS	The 1971-74 Sydney Area Transportation Study
SCRA	The Sydney Cove Redevelopment Authority
SPA or The Authority	The State Planning Authority of NSW
SROP	The Sydney Region Outline Plan, 1968
TAC	The Traffic Advisory Committee
UCV	Unimproved Capital Value

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- B ACTION PLAN NO. 3: THE WYNYARD PEDESTRIAN NETWORK, adopted by the City Council on November 8, 1971.
- C THE DEVELOPMENT CONTROL AND FLOOR SPACE RATIO CONTROL CODE, adopted by the City Council on December 6, 1971 (Green Book).
- D THE PARKING POLICY AND PARKING CONTROL CODE FOR NEW DEVELOPMENT, adopted by the City Council on December 6, 1971. (Blue Book).
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## INTRODUCTION

On July 7, 1972, the Authority considered Chief Planner's Reports Nos 9/72, 48/72 and 51/72 and resolved to defer determination of the Authority's attitude to a number of matters of longer term significance arising from the 1971 City of Sydney Strategic Plan, and also to three particular items :-

- a) Methods of measuring Total Floor Area for density control purposes (i. e. whether the thickness of external walls, the space inside the internal faces of lift wells and vertical ducts, should be included or excluded);
- b) Whether "International Hotels" should be covered by Floor Space Ratio Controls, or should be excluded and each case treated on "merit";
- c) Whether Floor Space Bonuses should be granted for financial contributions to a Council's perimeter parking fund, as in the case of the City Council's Floor Space Ratio and Parking Policy and Control Codes and Action Plans, which seek to shift the location of parking from underneath buildings in the CBD to the fringe served by the Western Distributor west of Kent Street.

The Authority resolved to defer determinations on these matters pending :-

- i) the presentation of a full Report to Authority Members by myself on the City Council's attitude;
- ii) discussions between SPA and Council officers and Council's Planning Consultant, in the interim; and
- iii) receipt of a Report from HOBAC on methods of measuring Total Floor Area for density control purposes.

By Resolution dated July 17, 1972, the Council of the City of Sydney adopted a Lord Mayoral Minute recommending that Council's Departmental Heads and Planning Consultants assist me in preparing this Report. Their advice and support have been valuable.

I have, in preparing this Report, dealt with a number of particular matters in the much wider context of the Authority's and the City Council's planning problems and ongoing planning processes. I welcome this opportunity to provide the Authority with "feedback" information on the Council's views and attitudes, and hope that the latter will be appreciated and accepted as being expressed for the benefit of both City and regional planning. I have tried to find a path through the jungle of planning ideas and controls proposed by the staffs of the Authority and the Council, in order to assist the Authority in forming opinions on their merits.



LEO PORT

Alderman, Council of the City of Sydney  
and Member, The State Planning Authority of NSW  
November 17, 1972



THE PROCESSES OF STRATEGIC AND ACTION PLANNING, AND  
OF DEVELOPMENT CONTROL, INITIATED BY THE COUNCIL OF  
THE CITY OF SYDNEY

Report to the State Planning Authority by Alderman Leo Port,  
BE, FIE Aust, M Cons E Aust, Representative on the Authority  
of the Council of the City of Sydney

November 17, 1972

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REPORT AND RECOMMENDATIONS

1. On July 7, 1972, the Authority resolved to request me to prepare, for the consideration of fellow Members, a Report on matters arising from the Chief Planner's Reports Nos 9/72, 48/72 and 51/72 of January, May and June this year respectively, which set out views on the City Council's July, 1971, Strategic Plan and December, 1971, Floor Space Ratio and Parking Control Policies and Codes.

2. Report 9/72 listed "points of significance which warranted special consideration and comment by the Authority." The first of these was :-

"The City Strategic Plan is a very well produced publication which brings together, for the first time, a great diversity of ideas of all kinds relevant to the improvement of the city as a place for people, and relates these ideas in an integrated way to a general strategy for achievement. The City Council is to be congratulated for its initiative."

That statement is certainly welcomed by myself, as a Member both of the Authority and of the Council. A formal expression of it to my colleagues on the City Council would be most appreciated.

THE CITY COUNCIL'S EVOLVING PLANNING PHILOSOPHY AND  
CONTINUING PLANNING PROGRAMME

3. This present Report sets out, for the better understanding of fellow Members of the Authority, a summary explanation of the City Council's evolving philosophy and procedures which have formed the foundation of Council's continuing programme of strategic and action planning. It is submitted that this philosophy and these procedures have been, and are being, carefully and gradually evolved by Council in determined and continuing efforts by Council to overcome the difficulties in city planning and development control which had been allowed to proliferate unchecked for two decades,

and which confronted my colleagues and myself when we first assumed the responsibilities of City government in October, 1969.

4. The new City Council, of which I was and still am privileged to be a Member, won office at the 1969 elections on a platform promising vigorous efforts in planning for the City. We undertook to support and prosecute positive planning. Our election platform included promises to carry out specific projects such as the Martin Place Pedestrian Plaza. Our first electoral victory gave us a popular mandate to make a fresh start in planning for the City after two decades of relative neglect and failure.

5. On taking office, we determined to support and actively assist the SPA in the implementation of the 1969 Woolloomooloo Plan, because we felt that, as a matter of basic principle, we should support other Authorities in their planning efforts, and that public confidence, in the concept of positive and detailed planning for particular precincts, should be maintained by mutual support and cooperation between State and City Authorities. We felt that this was particularly important in the case of the SPA's Woolloomooloo Plan, as it was the first "detailed action plan" for a City Precinct.

6. We also determined systematically to analyse and review all of the City's development and planning problems and opportunities in order to lay a firm and well-considered foundation of planning for future Aldermen to build on. We resolved to launch an entirely new process of city planning in and for the City of Sydney.

We decided that this process should and would be, to the best of our ability and within the limits of our powers :-

- a) systematic, in that it would proceed from the general to the particular, from the definition of basic objectives, through the gaining of public support for a set of broad policies, followed by action to interpret and implement those policies year by year in practical and specific detail in accordance with realistic priorities. We decided that first, we would determine a flexible long range strategy, then tactics for a particular year, followed by action month by month;
- b) open, in that we would not only open our Council Committee Meetings to the press, but also seek to encourage the maximum possible citizen and interest group participation in every stage of the planning process, and to achieve the maximum possible exposure of planning problems, opportunities and controversies to the media, so that public opinion could play a more knowledgeable and effective role in both the shaping and the implementation of planning objectives than it had ever been allowed to do in the past;

- c) co-operative, in that we would seek to maximise liaison and assistance to and from the Council and regional and State authorities, welcoming their guidelines and accepting their advice wherever possible;
- d) responsibly independent, in that we would seek to regain for the Council the respect and support of the public and of other authorities, by gradually strengthening Council's own capacities and skills for effective City management, and so gradually re-assume responsibilities for City government which had, due to the neglect of ~~previous Councils~~, been taken over by ad hoc bodies or State authorities;
- c) continuous, in that we would regularly review and as necessary revise and amend our objectives, policies and priorities in the light of the feedback of new information and the reactions of public opinion and of other authorities.

7. As the first step in the launching of this process, we decided to prepare an overall strategy to guide and govern the management and planning of City development. We completed what we now refer to as the 1971 City of Sydney Strategic Plan within our first brief period in office, before we faced the electors again in September, 1971.

8. It is acknowledged that the City Council, for more than two decades prior to 1970, neglected the responsibilities of planning for the City. It is submitted that the new City Council has, over the last two years, reversed that situation, and is now in a position to prosecute a continuing process of constantly improving planning and development control for the City and should be given all possible support in these endeavours. It is also acknowledged that the SPA's major responsibility is for State-wide and regional planning, and in supervising suburban planning where Local Councils are not yet equal to the task. The SPA cannot be expected to carry the workload of, or to be equally proficient in, the complex matters of city centre detail planning to which the City Council has devoted so much care and attention over the last two years. It is submitted that the SPA should produce and communicate to the Council more usable and practical regional development projections and guidelines and that the City Council should be given more encouragement and increasing responsibility in planning and controlling development within the City.

9. Evidence is submitted, in Annexure K hereto, to demonstrate that over the years prior to Council's 1971 publication and adoption of the first City Strategic Plan, the SPA itself either

caused, aggravated or was unsuccessful in checking many of the City's development and development control problems. The SPA, as well as other authorities, planners, developers and the community as a whole, can now better comprehend the complex interactions and statistical ramifications of most of the City's problems as a result of the comprehensive analysis and documentation compiled and published for the first time in the Council's 1971 City Strategic Plan.

10. It is therefore submitted that the SPA should actively support the City Council in building upon the foundation the Council has laid. In the light of the breadth and depth of Council's demonstrated research and planning initiatives, capabilities and achievements to date in defining and tackling the problems of the metropolitan centre, and of Council's growing capacity and willingness to act upon these problems, it is also submitted that Council should be given more opportunities to participate in and learn from the work and discussions of bodies such as CUMTAC which are concerned with regional decision-making which affects and is affected by planning and development control for the City as a metropolitan centre.

11. It is also submitted that it would now be timely to reappraise the original purposes of the Height of Buildings Act 1912-67, and in particular, the 1957 Amendments to the Act and the roles, functions and operational procedures of HOBAC, in order to devise new arrangements which would more effectively serve present and future development control needs.

#### THE COORDINATION OF SPA AND COUNCIL POLICIES

12. The Chief Planner's Reports under reference range widely over a number of matters arising from the 1971 City of Sydney Strategic Plan, and the 1971 City Council's Floor Space Ratio and Parking Control Policies and Codes. The Reports both over-simplify and confuse a number of issues. The following summarises the matters on which they express doubt or concern :-

- a) correlation of policies, actions and procedures pursuant to the 1968 Sydney Region Outline Plan, the 1969 Woolloomooloo Plan, the 1971 City of Sydney Statutory Planning Scheme and the City Council's 1971 City of Sydney Strategic Plan and subsequent Floor Space Ratio and Parking Control Codes;
- b) the possible need for their review and revision in the light of the results of the 1971-74 Sydney Area Transportation Study;
- c) future likely office workforce growth in the City;

- d) the desirable degree of concentration or "scatteration" of new office development in City Precincts outside the Central Business District, and the likely or desirable degree of office development in different Precincts;
- e) relationships between the capacity of streets serving the City and the levels of parking permitted by the City Council's policies and codes;
- f) whether the City Council's plans gradually to shift the bulk of future CBD parking onto the perimeter of the CBD, particularly to the western side, off the Western Distributor west of Kent Street, so as to facilitate the further pedestrianisation of the CBD, should be dropped in favour of, or regarded as complementary to, possible future parking stations at some suburban railway stations;
- g) whether the City Council's Floor Space Ratio Control Code should permit Bonus Floor Space in return for financial contributions to Council's funds for the provision of perimeter parking;
- h) whether the thickness of external walls, and the space inside the internal walls of vertical ducts and lift shafts should be counted as Total Floor Area for density control purposes;
- i) whether "International Hotels" should be excluded from Floor Space Ratio Control Codes and treated "on merit".

13. This present Report seeks to clarify a number of mis-readings and misconceptions regarding the above matters which, quite understandably, were evident in the Chief Planner's Reports based on documents embodying policies and technical details of considerable complexity.

14. It is only too easy for such complex documents as the 1971 City Strategic Plan (CSP), the City's various Action Plans and Development Control Codes, to be misread and misinterpreted. These documents are the first parts of a continuously evolving, comprehensive city planning process initiated by the City Council, which in the past has lacked participation in decision-making on so many of the inter-related governmental functions affecting individual pieces and elements of the City.

15. The 1971 City of Sydney Strategic Plan was the first fully documented, comprehensive examination and analysis of the City's roles, problems and opportunities, at least since the

Royal Commission Report of 1909, sixty two years before. The fact that the 1971 CSP book is so finely designed and produced, and is so integrated and comprehensive, has perhaps tended to distract attention from the depth and range of the basic technical and statistical analyses that went into its preparation, some of which are summarised in the book itself, particularly in the seven Annexures, which contain, as does the Plan as a whole, a wealth of information and analysis, much of it compiled and published for the first time.

16. The documents contain alternative estimates of possible long-term, 30-year contingencies, which had to be made in the absence of coordinated projections by other government authorities. The documents begin to establish policies and development control codes which the City Council has striven to make currently practicable and acceptable, and which seek to balance the opposing virtues of predictability and flexibility.

17. The following sub-sections of this Report summarise the Council's response to the specific matters itemised in Paragraph 12 above.

PLANS AND DECISIONS BY OTHER AUTHORITIES WHICH THE  
1971 CSP SOUGHT TO RECONCILE AND INTEGRATE - SROP,  
CSSPS, SATS, THE ROCKS AND WOOLLOOMOOLOO PLANS

18. The City Council has always sought to adhere to the SPA's 1968 Sydney Region Outline Plan (SROP), whenever and wherever it could pin down the highly generalised language of that Plan to practical terms impinging on the City. Objective No. 2 of SROP is "Sydney should remain Australia's greatest city, commercial centre and port," and "a city and port of world status and importance". Objective No. 6 is "Comprehensive replanning of the metropolitan centre is needed". The 1971 CSP noted these and began the process of implementing Objective 6.

19. SROP's Objective No. 8 is that "A wider and more balanced distribution of commercial activity should be established so that over-concentration of employment within the metropolitan centre can be avoided". On pp 26 to 30, the 1971 CSP points out that ever since 1950, natural economic forces have been deconcentrating employment from the metropolitan centre, and changing Sydney from a single centred metropolis to a many-centred urban region. SROP in 1968 did not acknowledge these natural trends. SROP's only indication of the size the City workforce could or should be was the statement on p. 32 that "if the current trend for concentration continues unchecked, employment at the centre may rise to a level of nearly half a million". The City Council's 1971 CSP did not accept this

possibility, and in the absence of firm regional plans or projections, sought the best advice available in early 1971 from both the SPA and SATS. SATS projections at that time were 380,000 to 530,000. The SPA gave no indication of disagreement with these figures.

20. During the preparation of the 1971 City Strategic Plan, the Council co-opted official Liaison Officers from the SPA, the Department of Local Government and CUMTAC, onto Council's own Committee which was directing the preparation of the Strategic Plan. Council and its Consultants time and again sought and invited from the SPA and/or the Chief Planner, through the SPA Liaison Officer, specific contributions of advice, guidance and statistical indications on matters of workforce levels and Floor Space Ratio control techniques. Time and again, the answer was that nothing could be added to the 1968 SROP generalities or the SPA 1968 proposal for a Floor Space Ratio formula.

21. It is necessary to review the context of decision-making by other authorities within which Council was striving to work, during the first half of 1971, when the Council's Consultants were attempting to estimate future City workforce contingencies.

22. During 1968-70, the SPA had failed to achieve governmental, professional, public or Council acceptance of a simple FSR formula proposed for the whole of the County Centre Zone, of relatively easy-to-earn FSR Bonuses which would allow a Maximum FSR of 12 on a Basic FSR of 6. However, the SPA's 1969 Woolloomooloo Plan, which was able to give untrammelled expression to the SPA's central city planning concepts and techniques, had been accepted by the outgoing City Commissioners. This Plan had been subsequently supported by the newly elected City Council, which determined to assist the SPA in its implementation. Council believed, as a matter of basic principle, that the planning efforts of other authorities should be supported, and that every effort should be made to maintain public confidence in this initial "action plan".

23. The Council accepted the impending gazettal of the City of Sydney Statutory Planning Scheme, which had been finalised by the SPA under the direction of the Minister, without any significant participation by the new Council. The pre-printed Scheme Map zoned 540 acres as "County Centre", within which virtually any use was to be permissible. The final Draft Ordinance had been amended to permit office buildings in the additional areas zoned "Light Industrial".

24. On February 3, 1971, the Minister for Local Government announced the Government's adoption and approval of the Sydney Cove Redevelopment Authority's Plan for the Rocks area, which



provided for an addition to the CBD workforce of 32,000. On February 11, 1971, in my presence, the Deputy Chairman of the Authority informed a meeting of representatives of the Ministry of Transport, Department of Railways, the Authority, the City Council and its Consultants, called to discuss the need for a railway station in Woolloomooloo, that SPA officers predicted a workforce in the order of 80,000 or more for Woolloomooloo. This estimate was independently confirmed by the calculations set out in the Table on page 83 of the 1971 CSP, which showed that with an average overall FSR of 8 to 10, Woolloomooloo could contain a workforce of 80,000 to 100,000.

25. Thus, the new Council, in preparing its 1971 City Strategic Plan, was confronted by a number of "faits accomplis":-

- a) The to-be-gazetted County Centre Zone was larger than the CBD;
- b) The final draft Ordinance permitted office buildings in Light Industrial Zones;
- c) The SPA had failed to achieve acceptance of a single FSR formula for the County Centre as a whole, which set a Basic FSR of 6 with relatively simple Bonuses giving a Maximum FSR of 12;
- d) The SPA Plan for Woolloomooloo permitted a "Maximum" FSR of 10, with provision for this being exceeded in "special locations and circumstances". The future Woolloomooloo workforce was consistently projected by independent calculations to be in the order of 80,000;
- e) The Rocks Scheme, with a projected workforce of 32,000, had been approved;
- f) Government plans had been approved in principle for a Tertiary Education Complex in Ultimo projected to cater for up to 60,000 students, and Cabinet had announced support for a major World Trade Centre at Pyrmont;
- g) Even if the then estimated CBD workforce of 230,000 to 240,000 within the then existing CBD were assumed to remain stagnant, the additional workforce planned for two sub-areas alone - the Rocks and Woolloomooloo - would bring the future total to 342,000 or 352,000, to which would need to be added other increases likely to result from other decisions concerning, e.g. Light Industrial Zones, the development of the Ultimo Education Complex and a possible future World Trade Centre.

26. It would have been irresponsible of Council and its Consultants at that time to have disregarded such decisions, approved plans and statements by other authorities. In fact, the Council's Consultants did question the magnitude and possible effects of some of the above proposals, and in the Table on p. 83 of the 1971 CSP, invited attention to these potential effects within the County Centre Zone.

#### 1971 CSP CONCEPTS OF THE POSSIBLE LONG-TERM FUTURE SIZE AND DISTRIBUTION OF THE CBD WORKFORCE

27. In the light of the situation described in Paragraphs 18 to 26 above, the 1971 City Strategic Plan assumed and warned that there was a contingent possibility that the CBD workforce could, not would, grow to the order of 360,000 to 400,000 by the year 2000, and that in view of this possibility, the City Council and the public should recognise the need for strong planning measures within the City such as were proposed in the other parts of the Strategic Plan. This assumed that the proportion of the Region's workforce in the CBD would continue to fall - from 34% in 1947 and 21% in 1966, to about 15% by the year 2000.

28. The Council's estimate of workforce contingencies published in the 1971 CSP were, in fact, conservative, in view of the possible effects of the decisions and actions of other authorities. In view of those decisions and actions, BOMA urged Council's Consultants to plan for a future CBD workforce of 600,000. At the time the 1971 CSP was published in July, 1971, the figure of 360,000 was the lowest estimate of possible future City CBD-type workforce that had ever been made by any authority or consultant.

29. The 1971 CSP called for a strongly rail oriented linear Central Business District (See Action Priority 2B on pp 82 to 84), concentrated along the traditional and firmly established north-south spine, with extensive pedestrianisation in the core and parking on the fringe. It was envisaged that this linear spine would extend from Circular Quay to Central Railway, and that it would possibly continue along the Railway to Redfern Station. This spine CBD is readily accessible to and from railway stations serving all rail lines radiating from the City.

30. This plan is consistent with the SROP principle of "linear extension along communications corridors with high intensity activities, such as commercial and industrial centres, and universities, located on the rail system where possible". It was on this basis that Council's Consultants recommended against extensive office development to the east in the Woolloomooloo

basin which is cut off from the CBD by the Domain, and which will have rail access from one line only. However, since large-scale office development then seemed certain in that basin, the 1971 CSP warned in a bold-typeface note on page 49, that "Any significant growth of offices within the City, but outside the Central Spine Business District, will be at the expense of the CBD". In other words, future City CBD-type workforce would not grow beyond the estimated maximum contingency. Eventually, it would either be concentrated within the lineal Central Spine, in accordance with the recommended strategy, or else dispersed or scattered at a lower average density over a much wider area of the City - including the rest of the 540 acre Statutory "County Centre" Zone and the Industrial Zones.

COUNCIL'S FSR CONTROL CODE, AND THE DESIRABLE  
DEGREE OF CONCENTRATION OR DISPERSAL OF OFFICE  
SPACE AMONG CITY PRECINCTS

31. The Council's December, 1971, Floor Space Ratio Control Code (see Annexure C), while accepting the SPA's own formula of a Maximum of 10 (or more) in Woolloomooloo, cuts the average Maximum FSR readily obtainable in practical terms on most Central Business District sites by 25 to 35 percent. This is because the City Council's Basic FSRs for smaller sites have been quite drastically reduced, and the City Council's Bonus FSRs are difficult, and often impossible, to earn. Other innovations include restrictions on the amount of office space which may be contained within projects in Precincts outside the Tank Stream and Brickfield Hill. The Chief Planner concedes, in his Report No. 9/72, that "action to drastically reduce densities probably cannot proceed too far ahead of public acceptance by landowners and developers". The Council's 1971 FSR Control Code has significantly reduced, in actual practice, overall achievable densities (see Annexure H - 'Comparative Evaluation of 25 typical office buildings assessed under the pre and post December 6, 1971, FSR and Parking Control Codes'). Despite outcries from BOMA that land values would be destroyed, the new Codes have gained widespread public acceptance because the reasons for entirely new types of controls were so convincingly presented by the 1971 City Strategic Plan.

32. Further, it is now evident, as was foreseen on pp 39-40 of the 1971 CSP, that the boom in CBD office building commencements is now ending, and that office space supply will exceed demand for some years, possibly until the end of this decade.

33. Council has always accepted the need to review and revise the 1971 City Strategic Plan in the light of the feedback of new information and opinion. In view of Council's decision to carry out the first such review and revision in 1973/74, to which I refer in more detail hereunder, Council does not believe that any

immediate, out-of-phase amendments should be made to the 1971 City Strategic Plan or the 1971 Floor Space Ratio and Parking Policy and Control Codes. This is particularly the case also in view of Council's Resolution of November 8, 1971, to prepare a Varying Scheme to amend and update the July, 1971, City of Sydney Statutory Planning Scheme.

34. On the question of the desirable degree of concentration or "scatteration" of high density office development in City precincts outside the CBD, the 1971 CSP and Council's FSR Codes make it clear that Council favours "concentration" within a strong lineal Central Spine Business District from Circular Quay directly south to the City Boundary on Cleveland Street, this "Spine" being well served throughout its length by public rail, bus and ferry transport. The only potentially significant deviations from this concept have not sprung from initiatives of the City Council. For example, the over-large County Centre Zone, as well as the Ordinance which permits offices in Light Industrial Zones, both originate in the Statutory Planning Scheme prepared by the SPA. Again, the Woolloomooloo Plan is an SPA product, prepared prior to the election of the new City Council, but in the implementation of which the Council has loyally sought to support the Authority.

#### THE PRINCIPLE OF CONCENTRATING FUTURE PARKING ON THE PERIMETER OF THE CBD

35. The Accessibility Objective of the 1971 CSP puts improvements in public transport at the top of the Council's Policies and Priorities for the City. The Plan itself fully analyses and documents, with the fullest possible statistical support, the kinds of improvements it advocates. However, because public transport is the statutory responsibility of other authorities, the City Council can only "urge, press for, seek and support" action by other authorities. Parking, however, happens to be a statutory responsibility of the Council. The Council accepts this responsibility and has concentrated its practical efforts on developing the policies and implementing the type of more restrictive controls which the SPA and other authorities had been advocating for many years.

36. The overall level of City parking permitted by the Council's 1971 Parking Control Codes, and by subsequent Action Plans (see Annexures D and E), have been related conservatively to the capacity of existing roads and streets serving the City (see Annexure J). Any statement to the contrary reveals a mis-reading or misunderstanding of the several carefully documented City Council publications on the subject of parking. Surveys of traffic capacity and of levels of service on existing streets have been carried out, and it is only from the results of these that present permissible parking capacities have been calculated. Possible future parking capacities have only been

indicated in Council planning documents as being dependent on possible future increases in the capacities of roads serving the City or removing through-traffic which currently uses City streets.

37. Council's Parking Policy is governed by the very specific principle, clearly stated, explained in detail and re-iterated in Council's adopted and published documents, that the maximum permitted total number of visitor and commuter parking spaces within an area must be no more than twice the maximum hourly capacity (after deducting through traffic) of the existing streets actually bringing traffic into the area. The 1971 CBD street capacity at the Outer Cordon was 21,000 vehicles per hour, of which 8,500 were through-traffic leaving 12,500 remaining within the Outer Cordon of the CBD. (See Fig. 1, - 1971 Parking Policy and Control Code, and Fig. 4 - Action Plan No. 4). Thus the maximum parking capacity within this Outer Cordon has been fixed at 25,000, given the road and street system we have to-day. The detailed 1971 Parking Control Code for New Development was formulated on this basis.

38. During 1970 and 1971, Council's officers and Consultants evolved Council's Parking Policy and Control Code in close working liaison with CUMTAC, COSPAC and TAC, their Joint Steering Committee on Parking, and the Working Group on Parking appointed by the Joint Steering Committee of CUMTAC, COSPAC and TAC. The result of this working liaison was a formal letter, dated February 15, 1971, from CUMTAC to the Town Clerk of the Council, confirming that meetings had been held between Council's Consultants and the Working Group on the draft City Parking Policy and Control Code Report, that this Report had been considered by CUMTAC, and that CUMTAC "regards the report as providing an acceptable interim policy to be reviewed in the light of any recommendation flowing from the Transportation Study for the Sydney Region now being undertaken." The Council also received a formal letter from the Authority, dated March 29, 1971, stating that :-

"The concept of fringe parking stations with ready access to the Western Distributor and attractive pedestrian links to the core of the City is endorsed; however, additional parking facilities should be related to the capacity of the lead-in road system as constructed from time to time.

"The concept of providing off-street loading and unloading facilities in all new buildings in the City is endorsed.

"The Council's foreshadowed interim parking policy and code should be subject to review in the light of results of the Sydney Area Transportation Study."

Refinements subsequently made to that draft report prior to its formal adoption by Council on December 6, 1971, had the effect of making it even more restrictive on the density of parking permitted throughout the City, particularly parking permitted to be placed underneath buildings in the central core. Striking statistical confirmation of this is contained in Annexure H hereto.

39. Council's Parking Policy is not intended to define the number and distribution of total CBD Parking by the year 2000. It does, however, explore the possible long-term future amounts and possible future distribution of parking within the City, in the light of probable future road improvements either at present under construction, or planned by the DMR, and for which land is reserved in the gazetted 1971 City of Sydney Statutory Planning Scheme. Stage 1 of the Western Distributor is now almost fully constructed. In June, 1971, the Minister publicly announced that he had approved, and that the DMR would soon begin, construction of Stage 2 of the North-Western Expressway between Pyrmont Bridge Road and Kent Street. The Commissioner for Main Roads has publicly stated that "it is expected that . . . . some of (this) work will be in use by 1975. The associated roads, which will provide for local traffic, are expected to be completed by 1978, allowing Pyrmont Bridge to be closed to traffic."

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40. These two projects are the only major roadworks on which the Council has based its plans for parking in the immediate short-term period to 1980. It has been estimated that together, they will increase the net capacity, excluding through traffic, at the Outer Cordon by 3,000 vehicles per hour, and could thus permit the Council to begin to plan for what the 1971 CSP advocates - the provision of future car parking stations directly served by the Western Distributor, to accommodate up to a maximum of 6,000 vehicles, on the CBD perimeter between the Outer and Inner Cordons west of Kent Street, so as to facilitate the gradually increased pedestrianisation of the core of the CBD. This short term future plan for the period up to 1980 is precisely detailed in Council's published Action Plan No. 4, formally adopted by Council on July 3, 1972.

41. Council's 1971 Parking Control Code reduced the total amount of parking developers are to provide for offices from one space per 1,500 sq. ft. to one space per 2,500 sq. ft., or by 40 percent. However, this is not the only reduction made in parking under office buildings. The Control Code further stipulates that only a limited proportion (in some cases, nil) of this requirement is permitted to be placed on-site under the building. The remaining spaces are not to be physically provided by the developer, but are the subject of financial contributions to Council's Parking Funds. These funds are to be used to provide public car parking stations on the

reverse

perimeter of Precincts, particularly adjacent to and served by the Western Distributor west of Kent Street, and linked to the CBD core by planned grade separated walkways. Thus, Council plans gradually to shift the bulk of parking out of the CBD core, and onto the perimeter, in accordance with recognised planning principles.

#### THE COMPLEMENTARY CONCEPT OF COMMUTER PARKING AT SUBURBAN RAILWAY STATIONS

42. State authorities have been discussing for some years the possible future provision of commuter car parking stations at suburban railway stations. To date, no feasible locations have been announced, let alone specific plans prepared. Furthermore, State authorities have taken no action to provide such stations on the Eastern Suburbs Railway now approaching completion. The City Council would welcome the provision of car parking at suburban railway stations, if any feasible locations could be determined, particularly on the North Shore line, from which area a good proportion of car commuters come, and from where entry to the City is inhibited by the Harbour Bridge bottleneck. However, any such possible future stations could only be complementary to, and not a substitute for a limited amount of parking on the perimeter of, and immediately adjacent to, the CBD, as planned by the City Council's Action Plan No. 4.

43. As and when the Sydney Region Outline Plan's long-term objective of major sub-regional office centres is achieved, there will be a greater need than ever before for short-term visitor parking on the perimeter of the CBD. One of the penalties of dispersion of industrial development throughout the Region since 1950, has been an enormous growth in cross-metropolitan vehicle-trips. Similarly, the already evident beginnings of office dispersal are producing more and more visitor vehicle-trips between dispersed offices, and between dispersed offices and the CBD. One of the virtues of the concentration of offices within a compact Central Business District is that inter-office trips can be made by walking or by short-haul public transport.

#### FINANCIAL CONTRIBUTIONS TO COUNCIL'S PERIMETER PARKING FUNDS

44. It appears that the Authority agrees with and supports the major element of Council's Parking Policy which limits the permissible quantity of private off street parking under buildings in the core, and of cash levies on developers to help Council pay for the provision of public perimeter parking stations. The Authority endorses this principle in its published Technical Bulletin No. 1 on "Metropolitan Parking Standards" of January, 1971. This endorsement is repeated in Paragraph 12 of the Supplement to the Chief Planner's Report No. 48/72. Many Metropolitan Councils have imposed and collected such levies for some years past, and continue to do so.



45. The fundamental principle behind the granting of limited Bonus Floor Space for cash contributions to Council's perimeter public parking funds is exactly the same basic principle underlying all Bonus FSR systems. This principle is documented at length under Policy 3, and Action Priorities 3A and 3B, on pp 93-95 of the 1971 City Strategic Plan. In brief, it is the use of "sticks and carrots" to ensure that developers play their part in providing the public facilities required to meet the demands placed upon the City environment by the use of their new buildings, whether these be pedestrian underpasses or overpasses, plazas, through site links, escalators, public toilets, branch libraries or perimeter parking stations. The limited FSR Bonus for cash contributions to perimeter parking funds is one such incentive, or "carrot", deemed necessary at this time to soften the blows of the requirements, or "sticks", which :-

- a) drastically cut Basic FSR;
- b) prohibit a developer from providing the parking under his building which his tenants want;
- c) threaten in consequence to either lower his rents or increase his difficulties in letting space;
- d) levy cash contributions on him, and
- e) in consequence, may lower his land value, his potential development value and his profitability.

The economic calculation of the relationships between cash contribution and amount of Bonus Floor Space in each Precinct has been carefully investigated by Council, and is being kept under continuing review - see Annexure G hereto, Report on "Financial Contributions to Council's Parking Funds in return for FSR Bonuses in certain Precincts" as adopted by Council on May 8, 1972.

46. It is true that if the 1971 FSR Control Code did not grant any Bonus Floor Space for such contributions, then the overall average achievable FSR would be even lower. But then, the degree of acceptance of the entire FSR Control Code, and the reductions it already imposes, would correspondingly be lowered, probably below the point of survival.

47. Council began to apply the provision of the new Parking Code, and to levy financial contributions for required spaces not permitted on-site, on new, renewed and amended Development Consents issued from the beginning of 1972. It would obviously be unreasonable if Council were to expect all of the City's future parking funds to be provided by the relatively small proportion of developments involved. Equity requires that all existing City buildings, which will also benefit either directly or indirectly by

the provision of short-term and long-term perimeter parking, should also contribute, as should also those individuals who use public parking already provided in the City, either at metered street spaces or in Council-owned and operated Public Parking Stations.

48. It was with these considerations in mind that Council resolved on July 3, 1972, to allocate to Council's Parking Fund "such other sources of revenue as Council may from time to time determine", specifically including "the net proceeds from the sale of surplus street and land space" under street rationalisation schemes. Under Action Priority 7C on pp 111-112 of the 1971 City Strategic Plan, and on pp 39-42 of Annexure E hereto, Action Plan No. 4, other possible sources of revenue have been reviewed by Council's Consultants for Council's consideration. One of these is an increase in the basic Parking Meter charge, which has not been raised from 5 cents since the first introduction of parking meters seventeen years ago. Another is the levying of a special parking rate on non-residential areas, as is the practice of other metropolitan Councils.

#### MEASUREMENT OF TOTAL FLOOR AREA FOR DENSITY CONTROL PURPOSES

49. On the question of the methods of measuring Total Floor Area, the City Council and its Consultants spent twelve months in detailed research and consultations. We began by holding the view that the Chief Planner has recently expressed, but after full investigation, we were satisfied that Total Floor Area should be measured, and so defined it in the adopted 1971 Codes, as, inter alia :-

- a) within the inner faces of the external walls at a height of 4'6" above the floor;
- b) including the space occupied by internal walls, staircases, lobbies, corridors and toilets;
- c) excluding the horizontal cross sectional area of lift shafts and vertical service ducts measured between the wall faces internal to the lift shaft or duct.

50. It is agreed that the essential purpose of Floor Space Ratio Control is to control the density of people either in residence, in the workforce, or in other activity. People can only occupy actual usable floorspace. Therefore it does not seem logical to measure spaces not normally used by people. BOMA has strongly pressed this view, carrying it to its logical conclusion by urging that only Net Lettable Space be measured. The City Council and its Consultants, however, could not agree to this, because of :-

i) the danger of abuse - of spaces being converted from one purpose to another use after construction;

*delete*

ii) ~~because of~~ the practical administrative difficulties of agreement on what to deem "net lettable" space in particular schemes where internal partitions are rarely finally determined until after the structural shell of a building is finished, and are even then subject to change in future years.

*BF* ✓

51. Council and its Consultants sought, obtained and examined plans and statistical data concerning the percentage of the overall envelope of particular building types and specific buildings occupied by particular building elements. The City Building Surveyor and his Deputy, members of the HOBAC Technical Committee, architects, engineers and building economists, were consulted extensively. It was finally determined that any finally adopted definition of Total Floor Area must :-

- a) be administratively practical;
- b) not be open to abuse by applicants for Development Consent;
- c) include all spaces capable of occupancy and use, or later conversion to usable floor space;
- d) overcome the existing practical measurement problems, difficulties, ambiguities and ad-hocery which result from attempts to precisely measure the thickness of external walls, columns and spandrels;
- e) encourage, and not discourage or inhibit, freedom for architects to design sculpted facades where appropriate, so as to reduce the "cigar box" criticism levelled at the flat and thin skinned building form which is typically produced when every square foot of wall thickness means a financial loss in rentable space;
- f) encourage, and not inhibit, the provision by developers of the highest possible standard of the vertical public transport systems represented by lifts;
- g) encourage, and not inhibit the provision of the highest possible standards of the "life-support" systems of mechanical services, and even to encourage the provision of spare vertical duct capacity to allow for additional future needs, so as to reduce the future rate and extent of building obsolescence.

It was also agreed that the two questions of the best method of measurement, and of permissible FSR, must be treated as two entirely separable matters. It was agreed that if the finally

adopted method of measurement involved an average percentage reduction on previous methods, then Floor Space Ratios should be correspondingly cut.

52. Having regard to evidence studied under each of the requirements (a) to (g) above, the definition adopted by Council, and now recommended to the Authority by the Council for eventual general use throughout the State, is as follows :-

"Total Floor Area" means the sum of the gross horizontal areas of each and every floor of a building contained within the inner faces of the outer walls measured at a height of 4'6" above the floor, including the space occupied by internal walls, staircases, lobbies, corridors, and toilets, but excluding the horizontal cross sectional area of lift shafts and vertical service ducts measured between the wall faces internal to the lift shaft or duct and excluding any space permanently set aside within the building for the parking, unloading or loading of vehicles, including ramps or other means of access thereto, or for the accommodation of mechanical or electrical plant or equipment servicing the building.

53. Because this can result in a percentage difference of approximately 6 to 10% on the previous definition (see Annexure H), the Basic Floor Space Ratio in the Tank Stream and Mid Town Hub Precincts for sites larger than 12,500 sq. ft. was cut from 6.0 to 5.5 Basic FSR for smaller sites was cut even further, down to 3.0.

54. In all considerations of what are acceptable Basic and acceptable Maximum FSRs for a Precinct, the relative degrees of difficulty of gaining the defined Bonuses should be carefully studied. The City Council believes that the Bonus elements of the 1971 FSR Codes are so tightly defined that the ultimate overall actual FSR achieved under those Codes will be substantially less than the Maximum theoretical limits stated in the Codes.

55. It should also be noted that the average area of floor space per employee in office buildings appears to be increasing at a rate which could be as high as 2% per annum. The significance of this is that the total future workforce per unit of FSR is likely to fall substantially over future years.

#### COUNCIL'S FSR CONTROL POLICY AS RELATED TO HOTELS.

56. It is difficult to believe or accept that the administrative details of Floor Space Ratio Control for "International Hotels" in the City should be matters of regional concern which should

take up the valuable time and scarce resources of the SPA. Nevertheless, since the subject has been raised, the City Council's attitude is explained below:

57. The economic problems of a hotel on a site of its own, in a Precinct where almost all allowable FSR may be used for office purposes, are most fundamentally those of operating costs related to revenue. As operating costs, including land taxes and rates, rise faster than gross revenue, hotel and similar non-office uses become less profitable and more sensitive to displacement. Enquiries during 1971 indicated that the optimum sizes for central City motels and hotels appeared to fall into three categories - of approximately 200, 400 and 600 bedrooms respectively. When rates and taxes on the UCV are added to normal operating costs, and if these have to be absorbed wholly by a motel or hotel on a site of its own, the economic feasibility of new projects becomes increasingly difficult. Limitless Floor Space Ratio for motel or hotel purposes is simply not any help in these circumstances.

58. Commonwealth and/or State Government concessions and subsidies to the international tourist industry, as currently being requested by ANTA, appear to be the first basic need. Council has resolved to support these requests under Action Priority 10C of the 1971 CSP. Under Action Priority 10D, Council undertook to investigate the practicality of adjustments to zoning techniques and of Land Tax and Rating systems to assist retail, hotel, theatre and tourist land uses to continue to operate and to expand in the City. These matters are discussed on p.130 of the 1971 CSP. Council has not yet had an opportunity to carry out these investigations.

59. The 1971 CSP sought to encourage hotels, motels, convention facilities (defined under the term "Place of Assembly"), retailing, entertainment and residential uses in many Precincts of the City. In the Mid Town Hub Precinct, for example, the FSR Code prohibits the use of more than 50% of the floor space in any project for offices. It is hoped that the Valuer General will take this restriction into account when next fixing the UCV of land within this Precinct so that the impact of rates and land tax on the operating costs of non-office uses will be reduced.

60. The 1971 FSR Code also seeks to provide opportunities for motels, hotels, with or without convention facilities, and residential accommodation to be given an opportunity to compete with offices for the attention of developers in the Tank Stream and Brickfield Hill Precincts. The Code for these Precincts gives an FSR bonus of 1 for projects on sites of 20,000 sq. ft. or more which contain 200 or more bedrooms. The Code further grants

an FSR bonus of 2 for projects on sites of 40,000 sq. ft. or more containing 400 or more bedrooms. Additional bonuses are granted for space set aside for convention facilities, shops, restaurants, taverns, theatre restaurants, etc. The Code makes it relatively easy for projects containing more than 400 bedrooms, together with ancilliary facilities that might justify the mystic title of "International Hotel", to achieve FSRs of 10.5 in the Tank Stream and Mid Town Hub Precincts and of 11 in the Brickfield Hill Precinct. Such projects must be on sites of 40,000 sq. ft. or more. However, on a 40,000 sq. ft. site, a 400 bedroom hotel could be developed within an FSR of 3, 4 or 5, depending upon the lavishness of space standards. Thus, a plot ratio of 5, 6 or 7 remains available on the site after the hotel has been provided. This may, in the Tank Stream and Brickfield Hill Precincts, be used entirely for offices which can help the hotel component to more easily bear the burden of operating costs. Such mixed developments could readily be designed as "twin tower" projects, such as the Westfield Hotel and office development now under construction on William Street.

61. The 1971 CSP envisaged that hotels and motels might successfully be encouraged to develop along both sides of the William Street boulevard and the Oxford Street boulevard proposed by the Strategic Plan. These strips are felt to be particularly suitable for hotel and motel uses. Land values are here lower, and demand for office space considerably less, than in the Central Business District. Hotels on the William Street boulevard would be well located for visitors, halfway between the entertainments of Kings Cross and the CBD. Oxford Street is on a ridge which commands good views, is within easy striking distance of the CBD and is on the way to and from the airport and the sporting facilities at Moore Park. It is not without significance that the first major post-war redevelopments on both Oxford and William Streets are for hotels, motels and airline facilities.

62. It is hoped that current action planning processes for both William Street and Oxford Street will resolve the difficulties of development control in both these locations. Each was difficult to deal with effectively during 1971. The Oxford Street Precinct was zoned "County Centre" by the 1971 Statutory Plan as was the northern side of William Street. The southern side of William Street is still zoned "Residential 2B". What may be required, for both sides of both future boulevards, is an intermediate zoning which will make it possible for the Council to refine Floor Space Ratio controls more specifically to the particular problems and opportunities (e. g. the implementation of the boulevard concept) that each presents.

63. The City Council wishes to adhere to the principle that Floor Space Ratios should be regulated by precise mathematical

codes so that areas of so-called "discretion", or what may be more accurately termed "haggling", can be reduced to a minimum. It is felt that once a specific exception is made for one particular building type, special pleas for other building types will follow, leading to confusion.

#### THE COUNCIL'S 1972 ACTION PLANNING PROGRAMME

64. It is desired to inform the Authority of some of the technical work currently being undertaken by Council on subjects raised by the Chief Planner, and some relevant and important decisions made by Council subsequent to the dates of the Chief Planner's Reports, and hence not previously available for the Authority's consideration.

65. Significant progress is being made in technical work on a further 23 detailed Action Plans for completion in 1972-73, many of which involve the researching in detail of particular problems raised, and criticisms made, in the Chief Planner's earlier Reports, such as Floor Space Ratio Controls in Light Industrial Zones, the capacity of the city street system, and parking policies; as well as other important priorities such as the extended pedestrianisation of the city core; the techniques of achieving historic building preservation; and improved procedures and standards for the examination and screening of Development Applications, as a result of the progressive implementation of the Strategic Plan's Action Priority 1E regarding the reconstitution and strengthening of the City's own Planning Department.

66. It is further relevant to mention the adoption by Council on July 3, 1972, and subsequent publication of the City's Action Plan No. 4, which details some of Council's further technical investigations into the capacity of the City street system, and Council's decisions on means of beginning to concentrate most future new Central Business District parking on the fringe west of Kent Street adjacent to the Western Distributor, to facilitate the extended pedestrianisation of the CBD. A useful conference on this subject, between representatives of Council, HOBAC and COSPAC, including representatives of their Technical Sub Committees, the Authority's Chief Planner, Council's own Staff and Consultants, was held in the Town Hall on November 7. COSPAC members praised Council's Parking Control Code as being of the highest world standards. The question of how much should be allocated for short term parking, and how much all day parking, was discussed, as was also the question of how to control or police decisions of this sort. Investigations are continuing. The City Council's Consultants are preparing a report on the problem.



67. It is important for the Authority to note that specific proposals for car parking on the western perimeter as determined by Council's adoption of Action Plan No. 4 cover only the short-term period to 1980, pending the preparation, adoption and the hoped-for beginning of effective implementation of specific longer term regional policies and projects regarding improved public transport and more precise data on practicable long-term future modal split, for information on which we await the results of SATS.

#### THE 1974 CITY OF SYDNEY STRATEGIC PLAN

68. I am also pleased to inform the Authority of the City Council's decision to comprehensively review and revise, for publication by mid-1974, the 1971 City Strategic Plan. The necessity for this review and revision was foreseen and foreshadowed on page 70 of the 1971 Plan. It will now be conducted in the light of such new factors and subsequent events as :-

- a) The greatly heightened public awareness, appreciation and knowledge of urban planning problems and opportunities, in the creation of which the 1971 City Strategic Plan has itself been, as was intended, a significant generating force and catalyst;
- b) The longer term implications of the emerging data and results of SATS, to which the 1971 City Strategic Plan was itself an input, and which can now in turn receive inputs from SATS;
- c) The current over-supply of office space, and the consequent likely postponement of office projects not yet commenced, for the next 5 to 8 years, which appears already to have affected many proposals, including schemes for the Rocks and Woolloomooloo areas;
- d) New data now available to Council's Consultants from surveys only recently completed, which indicate that the City office workforce may actually have fallen slightly between 1969 and 1972, and indicates that the Council's Consultants lower projected CBD workforce growth rates of between 0.7% and 1.3% per annum are likely to apply during the next 8 years;
- e) New data becoming available from the Council's own action planning program, and other private and governmental sources including the 1971 Census and the 1969 Economic Census;
- f) Inputs to be requested from the SPA itself of new research data and regional policy guidelines relevant to the City's role in the Region, in more precise terms and specific detail than was able to be incorporated in the 1968 Sydney Region Outline Plan or made available to Council

during the preparation of the 1971 City Strategic Plan;

- g) The possible future significance of recent new initiatives and decisions by State and Federal Government regarding public transport and selective decentralisation;
- h) The outcome of further consideration and action by Council and the SPA, together with other relevant bodies regarding such matters as amendments to the City Statutory Planning Scheme Ordinance and Map, and simplified procedures for the processing of Development Applications, the desirable balance to be sought between short term and all-day parking, practicable techniques for achieving this balance, parking meter and other parking charges, the possible long-term phasing out of parking meters, alternative methods of raising finance for car parking purposes, the implementation of further pedestrianisation proposals in the CBD and elsewhere, practical legal techniques to ensure the preservation of historic buildings, and a detailed residential development control code for the City.
- i) New advice and guidance to be requested from CUMTAC, SATS and the new Public Transport Commission.

#### ADMINISTRATIVE DIFFICULTIES AND DELAYS UNDER THE 1971 STATUTORY PLANNING SCHEME

69. A number of administrative difficulties and delays have been aggravated by the gazettal of the 1971 City of Sydney Planning Scheme Ordinance. Some of these can be resolved immediately by simple rearrangement of procedures at staff levels of the Authority and the Council. The resolution of others requires amendments to the Planning Scheme.

70. On November 8, 1971, the City Council resolved to prepare a Varying Scheme to amend and up-date the City of Sydney Statutory Planning Scheme gazetted on July 16, 1971, in the light of the City of Sydney Strategic Plan adopted by Council on August 2, 1971. The formal procedures required by the Local Government Act subsequent to the passing of such a Resolution have been complied with.

71. It is foreshadowed that the City Council will, by way of a Varying Scheme, be submitting to the Authority proposed amendments to the Scheme. In particular, these

will cover proposed amendments to the Ordinance, including the amendment of certain definitions, amendments to the land-use Tables, and amendments to the provisions dealing with existing buildings and existing works in Part IV of the Ordinance.

72. The procedures involved in the preparation, examination and gazettal of such a Varying Scheme will be complex and will inevitably take considerable time. Meanwhile, it is recommended that the Authority resolve to authorise administrative directives which would immediately simplify and streamline currently inefficient administrative techniques in the development control process.

73. The current techniques and procedures of conducting consultation with, and obtaining the concurrence of the Authority to particular classes of Development Applications are the ones most needing simplification. This matter is urgent and should be dealt with without delay.

74. The concept that some classes of Development Applications could be of regional significance, and therefore should be referred to the regional authority, was first incorporated in the 1951 County of Cumberland Planning Scheme Ordinance. Clause 43(1) of the County Scheme Ordinance provided that some classes of Applications must be referred to the regional authority for an expression of opinion, which had to be considered by the Council, but which left a decision on the Application to the Council. Other classes of Applications could not be granted consent without the concurrence of the regional authority. These latter classes were :-

- a) all development on land having frontage to a main road or a county road - except residential development not comprising more than 4 flats.
- b) all development on land with frontage within 300 ft. of a main road or county road, except residential development not comprising more than 4 flats.

75. In September, 1957, the Cumberland County Council, recognising the need for the efficient handling of Development Applications, advised the Council that :-

"If consultation under those provisions were to involve the submission of every case to the County Council in order to obtain formal expression of its view, determination of applications within the period of 40 days prescribed would be difficult to

achieve. It is therefore desirable to introduce some form of consultation which will both facilitate the speedy determination of applications and, at the same time, will meet the practical requirements for consultation in regard to the different types of development concerned."

The outcome of this was the introduction of a form of consultation to quickly and efficiently settle applications made under Clause 43(1) of the County of Cumberland Planning Scheme Ordinance. This resulted in consultation with the Cumberland County Council, through an officer authorised to concur on behalf of the regional authority, and later by means of assumed concurrence.

76. Under the County Scheme Ordinance, consultations and concurrences were handled quickly and efficiently, both with the County Council and with the Authority as its successor in the period 1964-1971. The situation altered markedly with the 1971 gazettal of the City of Sydney Statutory Scheme. Clause 35(1) of this Ordinance requires the concurrence of the Authority not only to all development on a main or county road, or within 300ft. of such a road, but also to four additional classes of Applications:-

- \* any commercial premises with a total floor area of more than 20,000 sq. ft.
- \* any development to be used wholly or partly as a shop, where total floor space exceeds 15,000 sq. ft.
- \* any development for the purpose of heliports, aerodromes or airports.
- \* any development on land between Billyard Avenue and the foreshore of Elizabeth Bay.

77. Great areas of the City are now either on or within 300ft. of a main or county road, within which all Development Applications, even minor ones for change of use, must receive the concurrence of the Authority. It will also be appreciated that even relatively small developments for the City commonly contain more than 20,000 sq. ft. of commercial floor space or else contain a shop and comprise more than 15,000 sq. ft. The greatly increased volume of such Applications requiring concurrence will be appreciated.

78. It has never been explained why the Ordinance specifically prohibits Council control of development over the 13 residential lots between Billyard Avenue and the foreshore at Elizabeth Bay. These 13 lots are subject under the

Statutory Scheme to a Foreshore Building Line and to a Height Limit of 50 feet above Standard Datum. Billyard Avenue itself is at RL 45 for a considerable part of its length, and falls to RL 15 at Ithaca Road.

79. The Council appreciates the action taken by the Authority in August, when it completely waived the requirement to consult, and granted the right to assume concurrence under Clause 35(1) (a) to (d) inclusive, within the County Centre Zone, except where concurrence is required under Clause 59.

80. By letter dated August 27, 1972, the Authority indicated to the Council that the Authority agrees that further action to reduce needs for consultations and concurrences is necessary.

81. Clause 59 of the Ordinance still requires the City Council to obtain concurrences by the Authority to all development inside the County Centre Zone in areas shown on the Scheme Map by broken blue edging and also in all areas zoned Residential 2(d), 2(e), 2(f) and 2(g). The areas within the County Centre Zone comprise :-

- a) all the land north of Bridge Street to Circular Quay, for which the Authority has long since completed a detailed plan for the control of development on privately owned land;
- b) the area off Railway Square bounded by George, Hay and Thomas Streets, together with a small area adjacent to the Southern Expressway, Broadway and Wattle Street, which are in the Ultimo Precinct A8, for which Council is currently preparing a detailed development control plan as part of Action Plan No. 9 for 1972;
- c) Woolloomooloo, for which the Authority has prepared a detailed plan which has been accepted by the Council, and which Council is reviewing and revising under Action Plan No. 7, the Project Director of which is Council's Principal Operational Planning Officer, Mr D. Daines.

The Residential areas within the City affected by Clause 59 are the tiny piece of 2(d) Zoning on the Pyrmont peninsula, another small area of 2(d) Zoning next to RPA Hospital, and the 2(e) Zoning atop the King's Cross Road Tunnel.

82. The Authority's letter of August 27, 1972, referred to in paragraph 80 above, stated that "when a detailed plan has been prepared and approved by the Minister for these areas (as described in Paragraph 81 (a), (b) and (c) above), steps will be taken to reduce, if not to eliminate, the necessity for consultation in those areas". It should be noted that Clause 59 makes absolutely no reference to any need for any plans of any sort to be approved by the Minister.

83. The City Council asks: Why should steps not be taken now? Detailed controls over privately owned land north of Bridge Street, have already, to the best of Council's knowledge, been devised, and maximum heights have been determined by the Minister. The Authority's development control criteria for this area could be simply codified, and the Council authorised to assume concurrence if the Authority's stated requirements are observed. Similar action could be taken with regard to the Ultimo areas, and to Woolloomooloo.

84. The absurdity of current procedures under Clauses 35 and 59 of the 1971 City Scheme Ordinance can be demonstrated by reference to many cases which simply waste the time of both the Authority and the Council. One typical example is as follows :-

Development Application for Change of Use from a cafe to a shop for the sale of fishing tackle at 16-18 Quay Street, Haymarket, involving alterations to shopfront and awning costing \$3,000.

Concurrence Required under Clause 59.

Date of Receipt of Development Application by Council,	<u>July 12, 1972</u>
Referred by Council to SPA,	<u>July 18, 1972</u>
Receipt of Reference Acknowledged by SPA,	<u>July 31, 1972</u>
Concurrence given in letter from SPA dated,	<u>October 26, 1972</u>
Council Consent granted under powers delegated by Council to Council Staff,	<u>November 8, 1972</u>
Time taken by SPA to give concurrence,	<u>3 months 1 week</u>
Total time taken to issue Consent,	<u>4 months</u>

It is submitted that all cases of this and similar kinds under Clauses 35 and 59 are a waste of time for both the Authority and the Council, force unnecessary delays onto Applicants, and tend to bring the development control processes as a whole into disrepute.

85. The greatest number of references to the Authority for concurrence arise from Clause 35(1) (a) and (b), which cover development on or within 300ft. of main or county roads. Not infrequently, the Authority's formal written replies to such references deal with matters which have nothing to do with main or county roads, traffic or traffic access. The Authority's formal replies often refer to zoning aspects of the Application, or to the landscaping of the site. In some instances, the Authority's formal replies do not answer the basic question of whether or not concurrence is granted, thus necessitating the further paperwork of a further referral. Needless administrative work could be avoided if the number of matters to be referred for concurrence could be severely curtailed, and if the Authority's answers to the remaining referrals could be kept to the point.

86. Another source of unnecessary paperwork is the stipulation under Clause 37(3) of the 1971 Ordinance which voids Consents granted under that particular Clause, if the development to which a Consent refers is not substantially commenced within twelve months of the date of the Consent. It is important to distinguish the difference between the voiding of new consents (issued after the date of gazettal of the Ordinance, July 16, 1971) under Clause 37(3), and the voiding of old consents (issued prior to July 16, 1971) under Clause 65 of the Ordinance. The purpose of Clause 65 has now been achieved. All Consents issued prior to July 16, 1971, have now either lapsed under Clause 65, or have been renewed under Clause 37.

87. It is therefore timely to consider whether the period of twelve months stipulated under Clause 37 is a fair and reasonable time within which to expect an Applicant to proceed from Council's Development Consent, through the obtaining of other approvals, through the process of complete contract documentation, the obtaining of Building Approval, the negotiation of a Building Contract, and the substantial commencement of a building.

88. The City Council believes that Clause 37 should be amended to stipulate a period of twenty four months, for two reasons : firstly, such a period is more reasonable in the light of the considerations referred to in Paragraph 87 above, and further, such an amendment would reduce the amount of administrative duplication required if most consents have to be resubmitted, re-examined and re-issued every twelve months.



## RECOMMENDATIONS

In the light of the considerations stated in this Report, it is  
RECOMMENDED :-

- 1) That the Authority congratulates the Council of the City of Sydney on its initiative in producing the City of Sydney Strategic Plan;
- 2) That the Authority approve in principle the Development Control and Floor Space Ratio Control Code and the Parking Policy and Parking Control Code adopted by the City Council on December 6, 1971, subject to their review upon the completion of the 1971-74 Sydney Area Transportation Study and the 1973-74 review and revision, by the Sydney City Council, of the 1971 City of Sydney Strategic Plan and associated Development Control Codes;
- 3) That the Authority give assistance to the Council of the City of Sydney in the Council's scheduled 1973-74 review and revision of the 1971 City Strategic Plan and associated Development Control Codes, by contributing inputs of all available research data and information on regional policy guidelines relevant to the City's role in the Region.
- 4) That the Authority supports the principle that the appointment of a Representative of the Council of the City of Sydney to the County of Cumberland Passenger Transport Advisory Committee would assist in achieving coordination of planning for the metropolitan centre and for the Sydney Region.
- 5) That the Authority advise the Minister for Local Government that the Authority believes it is now appropriate to reappraise the Height of Buildings Act 1912-67 in order to devise improved arrangements and procedures for development control under the Act.
- 6) That the Authority take the necessary steps to achieve adoption throughout the State of the following definition of Total Floor Area for the purposes of calculating Floor Space Ratios:

"Total Floor Area" means the sum of the gross horizontal areas of each and every floor of a building contained within the inner faces of the outer walls measured at a height of 4'6" above the floor, including the space occupied by internal walls, staircases, lobbies, corridors, and toilets, but excluding the horizontal cross sectional area of lift shafts and

vertical service ducts measured between the wall faces internal to the lift shaft or duct and excluding any space permanently set aside within the building for the parking, unloading or loading of vehicles, including ramps or other means of access thereto, or for the accommodation of mechanical or electrical plant or equipment servicing the building.

- 7) That the Authority request the Council of the City of Sydney to give priority to those parts of Council's Action Planning Programme which will enable Council to prepare and submit to the Authority for consideration such revisions as the Council may deem appropriate to the Development Control and Floor Space Ratio Control Code adopted by Council on December 6, 1971, regarding Precincts A9 (Railway), B1 (Oxford Street), B2 (South Side, William Street), B3 (Stanley Street), B4 (Woolloomooloo), C1 (West Surry Hills) and C2 (Flinders Street).
- 8) That the Authority authorise a senior staff officer to prepare, in conjunction with the City Council's City Planner, recommendations regarding desirable amendments to the 1971 City of Sydney Planning Scheme, with particular regard to amendments which would simplify or improve the processes of development control under the Scheme Ordinance.
- 9) That pending the determination by the Authority and the Minister of any recommended amendments to the City of Sydney Planning Scheme, the Authority authorise a senior staff officer to act in the name of the Authority in the processes of consultation, the making of representations and the granting of concurrences in accordance with Clauses 35 and 59 of the City of Sydney Planning Scheme Ordinance.
10. That the Authority take action to widen the existing spheres of assumed concurrence and non-necessity to consult under Clauses 35 and 59 of the City of Sydney Planning Scheme Ordinance.
11. That the Authority recommend to the Minister that immediate action be taken to gazette an amendment to Clause 37(3) of the City of Sydney Planning Scheme Ordinance so as to delete the words "twelve months" and replace them with the words "twenty four months".

**THE PROCESSES OF STRATEGIC AND ACTION PLANNING,  
AND OF DEVELOPMENT CONTROL, INITIATED BY THE  
COUNCIL OF THE CITY OF SYDNEY**

**REPORT TO THE STATE PLANNING AUTHORITY BY  
ALDERMAN LEO PORT, BE, FIE AUST, M CONS E AUST,  
REPRESENTATIVE ON THE AUTHORITY OF THE COUNCIL  
OF THE CITY OF SYDNEY**

**NOVEMBER 17, 1972**

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## INTRODUCTION

On July 7, 1972, the Authority considered Chief Planner's Reports Nos 9/72, 48/72 and 51/72 and resolved to defer determination of the Authority's attitude to a number of matters of longer term significance arising from the 1971 City of Sydney Strategic Plan, and also to three particular items :-

- a) Methods of measuring Total Floor Area for density control purposes (i. e. whether the thickness of external walls, the space inside the internal faces of lift wells and vertical ducts, should be included or excluded);
- b) Whether "International Hotels" should be covered by Floor Space Ratio Controls, or should be excluded and each case treated on "merit";
- c) Whether Floor Space Bonuses should be granted for financial contributions to a Council's perimeter parking fund, as in the case of the City Council's Floor Space Ratio and Parking Policy and Control Codes and Action Plans, which seek to shift the location of parking from underneath buildings in the CBD to the fringe served by the Western Distributor west of Kent Street.

The Authority resolved to defer determinations on these matters pending :-

- i) the presentation of a full Report to Authority Members by myself on the City Council's attitude;
- ii) discussions between SPA and Council officers and Council's Planning Consultant, in the interim; and
- iii) receipt of a Report from HOBAC on methods of measuring Total Floor Area for density control purposes.

By Resolution dated July 17, 1972, the Council of the City of Sydney adopted a Lord Mayoral Minute recommending that Council's Departmental Heads and Planning Consultants assist me in preparing this Report. Their advice and support have been valuable.

I have, in preparing this Report, dealt with a number of particular matters in the much wider context of the Authority's and the City Council's planning problems and ongoing planning processes. I welcome this opportunity to provide the Authority with "feedback" information on the Council's views and attitudes, and hope that the latter will be appreciated and accepted as being expressed for the benefit of both City and regional planning. I have tried to find a path through the jungle of planning ideas and controls proposed by the staffs of the Authority and the Council, in order to assist the Authority in forming opinions on their merits.



LEO PORT

Alderman, Council of the City of Sydney  
and Member, The State Planning Authority of NSW  
November 17, 1972

## GLOSSARY OF ABBREVIATIONS

ANTA	The Australian National Travel Association
BOMA	The Building Owners and Managers Association
CBD	Central Business District
CCS or The Council	The Council of the City of Sydney
City	The area within the boundaries of the Council of the City of Sydney
COSPAC	The City of Sydney Parking Advisory Committee
CSBD	The Central Spine Business District of the City of Sydney
CSP	The City of Sydney Strategic Plan, as adopted by the Council of the City of Sydney on August 2, 1971.
CSSPS	The City of Sydney Statutory Planning Scheme, as gazetted on July 16, 1971.
CUMTAC	The County of Cumberland Passenger Transport Advisory Committee.
DMR	The NSW Department of Main Roads
FSR	Floor Space Ratio
HOBAC	The Height of Buildings Advisory Committee
PTC	The Public Transport Commission of NSW
RAIA	The Royal Australian Institute of Architects (NSW Chapter)
RAPI	The Royal Australian Planning Institute (NSW Division)
SATS	The 1971-74 Sydney Area Transportation Study
SCRA	The Sydney Cove Redevelopment Authority
SPA or The Authority	The State Planning Authority of NSW
SROP	The Sydney Region Outline Plan, 1968
TAC	The Traffic Advisory Committee
UCV	Unimproved Capital Value

THE PROCESSES OF STRATEGIC AND ACTION PLANNING,  
AND OF DEVELOPMENT CONTROL, INITIATED BY THE  
COUNCIL OF THE CITY OF SYDNEY

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ADDENDA AND ERRATA

Add to Glossary of Abbreviations :

AP	Action Priority
DA	Development Application
RL	Reduced Level
RPAH	Royal Prince Alfred Hospital

Page 2, paragraph 4, line 4 : for 'out' read 'our'.

Page 2, paragraph 6, line 3: for 'firm a well considered' read  
'firm and well considered'

Page 5, paragraph 12f, line 6: for 'complementary to possible'  
read 'complementary to, possible'

Page 13, paragraph 41, line 3: for '2500 sq. ft. to one space per  
1500 sq. ft.' read '1500 sq. ft. to  
one space per 2500 sq. ft.'

Page 17, paragraph 50, lines 1 and 3:  
for 'i)' read 'a)' and  
'ii)' read 'b)'

Page 17, paragraph 50(ii), line 1 :  
for 'because of the practical' read  
'the practical'

Page 17, paragraph 51(g), line 1:  
for 'and not inhibit' read  
'and not inhibit, '

Page 21, paragraph 66, line 7: for 'Kent Street adjacene' read  
'Kent Street adjacent'

Page 23, paragraph 68(h), line 14:  
delete 'b'  
read 'preservation of historic'

REPORT TO THE STATE PLANNING AUTHORITY BY  
ALDERMAN LEO PORT, BE, FIE AUST, M CONS E AUST,  
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OF THE CITY OF SYDNEY

NOVEMBER 17, 1972

THE PROCESSES OF STRATEGIC AND ACTION PLANNING, AND  
OF DEVELOPMENT CONTROL, INITIATED BY THE COUNCIL OF  
THE CITY OF SYDNEY

Report to the State Planning Authority by Alderman Leo Port,  
BE, FIE Aust, M Cons E Aust, Representative on the Authority  
of the Council of the City of Sydney

November 17, 1972

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REPORT AND RECOMMENDATIONS

1. On July 7, 1972, the Authority resolved to request me to prepare, for the consideration of fellow Members, a Report on matters arising from the Chief Planner's Reports Nos 9/72, 48/72 and 51/72 of January, May and June this year respectively, which set out views on the City Council's July, 1971, Strategic Plan and December, 1971, Floor Space Ratio and Parking Control Policies and Codes.

2. Report 9/72 listed "points of significance which warranted special consideration and comment by the Authority." The first of these was :-

"The City Strategic Plan is a very well produced publication which brings together, for the first time, a great diversity of ideas of all kinds relevant to the improvement of the city as a place for people, and relates these ideas in an integrated way to a general strategy for achievement. The City Council is to be congratulated for its initiative."

That statement is certainly welcomed by myself, as a Member both of the Authority and of the Council. A formal expression of it to my colleagues on the City Council would be most appreciated.

THE CITY COUNCIL'S EVOLVING PLANNING PHILOSOPHY AND  
CONTINUING PLANNING PROGRAMME

3. This present Report sets out, for the better understanding of fellow Members of the Authority, a summary explanation of the City Council's evolving philosophy and procedures which have formed the foundation of Council's continuing programme of strategic and action planning. It is submitted that this philosophy and these procedures have been, and are being, carefully and gradually evolved by Council in determined and continuing efforts by Council to overcome the difficulties in city planning and development control which had been allowed to proliferate unchecked for two decades,



and which confronted my colleagues and myself when we first assumed the responsibilities of City government in October, 1969.

4. The new City Council, of which I was and still am privileged to be a Member, won office at the 1969 elections on a platform promising vigorous efforts in planning for the City. We undertook to support and prosecute positive planning. Our election platform included promises to carry out specific projects such as the Martin Place Pedestrian Plaza. Our first electoral victory gave us a popular mandate to make a fresh start in planning for the City after two decades of relative neglect and failure.

5. On taking office, we determined to support and actively assist the SPA in the implementation of the 1969 Woolloomooloo Plan, because we felt that, as a matter of basic principle, we should support other Authorities in their planning efforts, and that public confidence, in the concept of positive and detailed planning for particular precincts, should be maintained by mutual support and cooperation between State and City Authorities. We felt that this was particularly important in the case of the SPA's Woolloomooloo Plan, as it was the first "detailed action plan" for a City Precinct.

6. We also determined systematically to analyse and review all of the City's development and planning problems and opportunities in order to lay a firm and well-considered foundation of planning for future Aldermen to build on. We resolved to launch an entirely new process of city planning in and for the City of Sydney.

We decided that this process should and would be, to the best of our ability and within the limits of our powers :-

- a) systematic, in that it would proceed from the general to the particular, from the definition of basic objectives, through the gaining of public support for a set of broad policies, followed by action to interpret and implement those policies year by year in practical and specific detail in accordance with realistic priorities. We decided that first, we would determine a flexible long range strategy, then tactics for a particular year, followed by action month by month;
- b) open, in that we would not only open our Council Committee Meetings to the press, but also seek to encourage the maximum possible citizen and interest group participation in every stage of the planning process, and to achieve the maximum possible exposure of planning problems, opportunities and controversies to the media, so that public opinion could play a more knowledgeable and effective role in both the shaping and the implementation of planning objectives than it had ever been allowed to do in the past;

- c) co-operative, in that we would seek to maximise liaison and assistance to and from the Council and regional and State authorities, welcoming their guidelines and accepting their advice wherever possible;
- d) responsibly independent, in that we would seek to regain for the Council the respect and support of the public and of other authorities, by gradually strengthening Council's own capacities and skills for effective City management, and so gradually re-assume responsibilities for City government which had, due to the neglect of previous Councils, been taken over by ad hoc bodies or State authorities;
- c) continuous, in that we would regularly review and as necessary revise and amend our objectives, policies and priorities in the light of the feedback of new information and the reactions of public opinion and of other authorities.

7. As the first step in the launching of this process, we decided to prepare an overall strategy to guide and govern the management and planning of City development. We completed what we now refer to as the 1971 City of Sydney Strategic Plan within our first brief period in office, before we faced the electors again in September, 1971.

8. It is acknowledged that the City Council, for more than two decades prior to 1970, neglected the responsibilities of planning for the City. It is submitted that the new City Council has, over the last two years, reversed that situation, and is now in a position to prosecute a continuing process of constantly improving planning and development control for the City and should be given all possible support in these endeavours. It is also acknowledged that the SPA's major responsibility is for State-wide and regional planning, and in supervising suburban planning where Local Councils are not yet equal to the task. The SPA cannot be expected to carry the workload of, or to be equally proficient in, the complex matters of city centre detail planning to which the City Council has devoted so much care and attention over the last two years. It is submitted that the SPA should produce and communicate to the Council more usable and practical regional development projections and guidelines and that the City Council should be given more encouragement and increasing responsibility in planning and controlling development within the City.

9. Evidence is submitted, in Annexure K hereto, to demonstrate that over the years prior to Council's 1971 publication and adoption of the first City Strategic Plan, the SPA itself either

caused, aggravated or was unsuccessful in checking many of the City's development and development control problems. The SPA, as well as other authorities, planners, developers and the community as a whole, can now better comprehend the complex interactions and statistical ramifications of most of the City's problems as a result of the comprehensive analysis and documentation compiled and published for the first time in the Council's 1971 City Strategic Plan.

10. It is therefore submitted that the SPA should actively support the City Council in building upon the foundation the Council has laid. In the light of the breadth and depth of Council's demonstrated research and planning initiatives, capabilities and achievements to date in defining and tackling the problems of the metropolitan centre, and of Council's growing capacity and willingness to act upon these problems, it is also submitted that Council should be given more opportunities to participate in and learn from the work and discussions of bodies such as CUMTAC which are concerned with regional decision-making which affects and is affected by planning and development control for the City as a metropolitan centre.

11. It is also submitted that it would now be timely to reappraise the original purposes of the Height of Buildings Act 1912-67, and in particular, the 1957 Amendments to the Act and the roles, functions and operational procedures of HOBAC, in order to devise new arrangements which would more effectively serve present and future development control needs.

#### THE COORDINATION OF SPA AND COUNCIL POLICIES

12. The Chief Planner's Reports under reference range widely over a number of matters arising from the 1971 City of Sydney Strategic Plan, and the 1971 City Council's Floor Space Ratio and Parking Control Policies and Codes. The Reports both over-simplify and confuse a number of issues. The following summarises the matters on which they express doubt or concern :-

- a) correlation of policies, actions and procedures pursuant to the 1968 Sydney Region Outline Plan, the 1969 Woolloomooloo Plan, the 1971 City of Sydney Statutory Planning Scheme and the City Council's 1971 City of Sydney Strategic Plan and subsequent Floor Space Ratio and Parking Control Codes;
- b) the possible need for their review and revision in the light of the results of the 1971-74 Sydney Area Transportation Study;
- c) future likely office workforce growth in the City;

- d) the desirable degree of concentration or "scatteration" of new office development in City Precincts outside the Central Business District, and the likely or desirable degree of office development in different Precincts;
- e) relationships between the capacity of streets serving the City and the levels of parking permitted by the City Council's policies and codes;
- f) whether the City Council's plans gradually to shift the bulk of future CBD parking onto the perimeter of the CBD, particularly to the western side, off the Western Distributor west of Kent Street, so as to facilitate the further pedestrianisation of the CBD, should be dropped in favour of, or regarded as complementary to possible future parking stations at some suburban railway stations;
- g) whether the City Council's Floor Space Ratio Control Code should permit Bonus Floor Space in return for financial contributions to Council's funds for the provision of perimeter parking;
- h) whether the thickness of external walls, and the space inside the internal walls of vertical ducts and lift shafts should be counted as Total Floor Area for density control purposes;
- i) whether "International Hotels" should be excluded from Floor Space Ratio Control Codes and treated "on merit".

13. This present Report seeks to clarify a number of mis-readings and misconceptions regarding the above matters which, quite understandably, were evident in the Chief Planner's Reports based on documents embodying policies and technical details of considerable complexity.

14. It is only too easy for such complex documents as the 1971 City Strategic Plan (CSP), the City's various Action Plans and Development Control Codes, to be misread and misinterpreted. These documents are the first parts of a continuously evolving, comprehensive city planning process initiated by the City Council, which in the past has lacked participation in decision-making on so many of the inter-related governmental functions affecting individual pieces and elements of the City.

15. The 1971 City of Sydney Strategic Plan was the first fully documented, comprehensive examination and analysis of the City's roles, problems and opportunities, at least since the

Royal Commission Report of 1909, sixty two years before. The fact that the 1971 CSP book is so finely designed and produced, and is so integrated and comprehensive, has perhaps tended to distract attention from the depth and range of the basic technical and statistical analyses that went into its preparation, some of which are summarised in the book itself, particularly in the seven Annexures, which contain, as does the Plan as a whole, a wealth of information and analysis, much of it compiled and published for the first time.

16. The documents contain alternative estimates of possible long-term, 30-year contingencies, which had to be made in the absence of coordinated projections by other government authorities. The documents begin to establish policies and development control codes which the City Council has striven to make currently practicable and acceptable, and which seek to balance the opposing virtues of predictability and flexibility.

17. The following sub-sections of this Report summarise the Council's response to the specific matters itemised in Paragraph 12 above.

PLANS AND DECISIONS BY OTHER AUTHORITIES WHICH THE  
1971 CSP SOUGHT TO RECONCILE AND INTEGRATE - SROP,  
CSSPS, SATS, THE ROCKS AND WOOLLOOMOOLOO PLANS

18. The City Council has always sought to adhere to the SPA's 1968 Sydney Region Outline Plan (SROP), whenever and wherever it could pin down the highly generalised language of that Plan to practical terms impinging on the City. Objective No. 2 of SROP is "Sydney should remain Australia's greatest city, commercial centre and port," and "a city and port of world status and importance". Objective No. 6 is "Comprehensive replanning of the metropolitan centre is needed". The 1971 CSP noted these and began the process of implementing Objective 6.

19. SROP's Objective No. 8 is that "A wider and more balanced distribution of commercial activity should be established so that over-concentration of employment within the metropolitan centre can be avoided". On pp 26 to 30, the 1971 CSP points out that ever since 1950, natural economic forces have been deconcentrating employment from the metropolitan centre, and changing Sydney from a single centred metropolis to a many-centred urban region. SROP in 1968 did not acknowledge these natural trends. SROP's only indication of the size the City workforce could or should be was the statement on p. 32 that "if the current trend for concentration continues unchecked, employment at the centre may rise to a level of nearly half a million". The City Council's 1971 CSP did not accept this

possibility, and in the absence of firm regional plans or projections, sought the best advice available in early 1971 from both the SPA and SATS. SATS projections at that time were 380,000 to 530,000. The SPA gave no indication of disagreement with these figures.

20. During the preparation of the 1971 City Strategic Plan, the Council co-opted official Liaison Officers from the SPA, the Department of Local Government and CUMTAC, onto Council's own Committee which was directing the preparation of the Strategic Plan. Council and its Consultants time and again sought and invited from the SPA and/or the Chief Planner, through the SPA Liaison Officer, specific contributions of advice, guidance and statistical indications on matters of workforce levels and Floor Space Ratio control techniques. Time and again, the answer was that nothing could be added to the 1968 SROP generalities or the SPA 1968 proposal for a Floor Space Ratio formula.

21. It is necessary to review the context of decision-making by other authorities within which Council was striving to work, during the first half of 1971, when the Council's Consultants were attempting to estimate future City workforce contingencies.

22. During 1968-70, the SPA had failed to achieve governmental, professional, public or Council acceptance of a simple FSR formula proposed for the whole of the County Centre Zone, of relatively easy-to-earn FSR Bonuses which would allow a Maximum FSR of 12 on a Basic FSR of 6. However, the SPA's 1969 Woolloomooloo Plan, which was able to give untrammelled expression to the SPA's central city planning concepts and techniques, had been accepted by the outgoing City Commissioners. This Plan had been subsequently supported by the newly elected City Council, which determined to assist the SPA in its implementation. Council believed, as a matter of basic principle, that the planning efforts of other authorities should be supported, and that every effort should be made to maintain public confidence in this initial "action plan".

23. The Council accepted the impending gazettal of the City of Sydney Statutory Planning Scheme, which had been finalised by the SPA under the direction of the Minister, without any significant participation by the new Council. The pre-printed Scheme Map zoned 540 acres as "County Centre", within which virtually any use was to be permissible. The final Draft Ordinance had been amended to permit office buildings in the additional areas zoned "Light Industrial".

24. On February 3, 1971, the Minister for Local Government announced the Government's adoption and approval of the Sydney Cove Redevelopment Authority's Plan for the Rocks area, which

provided for an addition to the CBD workforce of 32,000. On February 11, 1971, in my presence, the Deputy Chairman of the Authority informed a meeting of representatives of the Ministry of Transport, Department of Railways, the Authority, the City Council and its Consultants, called to discuss the need for a railway station in Woolloomooloo, that SPA officers predicted a workforce in the order of 80,000 or more for Woolloomooloo. This estimate was independently confirmed by the calculations set out in the Table on page 83 of the 1971 CSP, which showed that with an average overall FSR of 8 to 10, Woolloomooloo could contain a workforce of 80,000 to 100,000.

25. Thus, the new Council, in preparing its 1971 City Strategic Plan, was confronted by a number of "faits accomplis":-

- a) The to-be-gazetted County Centre Zone was larger than the CBD;
- b) The final draft Ordinance permitted office buildings in Light Industrial Zones;
- c) The SPA had failed to achieve acceptance of a single FSR formula for the County Centre as a whole, which set a Basic FSR of 6 with relatively simple Bonuses giving a Maximum FSR of 12;
- d) The SPA Plan for Woolloomooloo permitted a "Maximum" FSR of 10, with provision for this being exceeded in "special locations and circumstances". The future Woolloomooloo workforce was consistently projected by independent calculations to be in the order of 80,000;
- e) The Rocks Scheme, with a projected workforce of 32,000, had been approved;
- f) Government plans had been approved in principle for a Tertiary Education Complex in Ultimo projected to cater for up to 60,000 students, and Cabinet had announced support for a major World Trade Centre at Pyrmont;
- g) Even if the then estimated CBD workforce of 230,000 to 240,000 within the then existing CBD were assumed to remain stagnant, the additional workforce planned for two sub-areas alone - the Rocks and Woolloomooloo - would bring the future total to 342,000 or 352,000, to which would need to be added other increases likely to result from other decisions concerning, e.g. Light Industrial Zones, the development of the Ultimo Education Complex and a possible future World Trade Centre.

26. It would have been irresponsible of Council and its Consultants at that time to have disregarded such decisions, approved plans and statements by other authorities. In fact, the Council's Consultants did question the magnitude and possible effects of some of the above proposals, and in the Table on p. 83 of the 1971 CSP, invited attention to these potential effects within the County Centre Zone.

1971 CSP CONCEPTS OF THE POSSIBLE LONG-TERM FUTURE SIZE AND DISTRIBUTION OF THE CBD WORKFORCE

27. In the light of the situation described in Paragraphs 18 to 26 above, the 1971 City Strategic Plan assumed and warned that there was a contingent possibility that the CBD workforce could, not would, grow to the order of 360,000 to 400,000 by the year 2000, and that in view of this possibility, the City Council and the public should recognise the need for strong planning measures within the City such as were proposed in the other parts of the Strategic Plan. This assumed that the proportion of the Region's workforce in the CBD would continue to fall - from 34% in 1947 and 21% in 1966, to about 15% by the year 2000.

28. The Council's estimate of workforce contingencies published in the 1971 CSP were, in fact, conservative, in view of the possible effects of the decisions and actions of other authorities. In view of those decisions and actions, BOMA urged Council's Consultants to plan for a future CBD workforce of 600,000. At the time the 1971 CSP was published in July, 1971, the figure of 360,000 was the lowest estimate of possible future City CBD-type workforce that had ever been made by any authority or consultant.

29. The 1971 CSP called for a strongly rail oriented linear Central Business District (See Action Priority 2B on pp 82 to 84), concentrated along the traditional and firmly established north-south spine, with extensive pedestrianisation in the core and parking on the fringe. It was envisaged that this linear spine would extend from Circular Quay to Central Railway, and that it would possibly continue along the Railway to Redfern Station. This spine CBD is readily accessible to and from railway stations serving all rail lines radiating from the City.

30. This plan is consistent with the SROP principle of "linear extension along communications corridors with high intensity activities, such as commercial and industrial centres, and universities, located on the rail system where possible". It was on this basis that Council's Consultants recommended against extensive office development to the east in the Woolloomooloo



basin which is cut off from the CBD by the Domain, and which will have rail access from one line only. However, since large-scale office development then seemed certain in that basin, the 1971 CSP warned in a bold-typeface note on page 49, that "Any significant growth of offices within the City, but outside the Central Spine Business District, will be at the expense of the CBD". In other words, future City CBD-type workforce would not grow beyond the estimated maximum contingency. Eventually, it would either be concentrated within the lineal Central Spine, in accordance with the recommended strategy, or else dispersed or scattered at a lower average density over a much wider area of the City - including the rest of the 540 acre Statutory "County Centre" Zone and the Industrial Zones.

COUNCIL'S FSR CONTROL CODE, AND THE DESIRABLE  
DEGREE OF CONCENTRATION OR DISPERSAL OF OFFICE  
SPACE AMONG CITY PRECINCTS

31. The Council's December, 1971, Floor Space Ratio Control Code (see Annexure C), while accepting the SPA's own formula of a Maximum of 10 (or more) in Woolloomooloo, cuts the average Maximum FSR readily obtainable in practical terms on most Central Business District sites by 25 to 35 percent. This is because the City Council's Basic FSRs for smaller sites have been quite drastically reduced, and the City Council's Bonus FSRs are difficult, and often impossible, to earn. Other innovations include restrictions on the amount of office space which may be contained within projects in Precincts outside the Tank Stream and Brickfield Hill. The Chief Planner concedes, in his Report No. 9/72, that "action to drastically reduce densities probably cannot proceed too far ahead of public acceptance by landowners and developers". The Council's 1971 FSR Control Code has significantly reduced, in actual practice, overall achievable densities (see Annexure H - 'Comparative Evaluation of 25 typical office buildings assessed under the pre and post December 6, 1971, FSR and Parking Control Codes'). Despite outcries from BOMA that land values would be destroyed, the new Codes have gained widespread public acceptance because the reasons for entirely new types of controls were so convincingly presented by the 1971 City Strategic Plan.

32. Further, it is now evident, as was foreseen on pp 39-40 of the 1971 CSP, that the boom in CBD office building commencements is now ending, and that office space supply will exceed demand for some years, possibly until the end of this decade.

33. Council has always accepted the need to review and revise the 1971 City Strategic Plan in the light of the feedback of new information and opinion. In view of Council's decision to carry out the first such review and revision in 1973/74, to which I refer in more detail hereunder, Council does not believe that any

immediate, out-of-phase amendments should be made to the 1971 City Strategic Plan or the 1971 Floor Space Ratio and Parking Policy and Control Codes. This is particularly the case also in view of Council's Resolution of November 8, 1971, to prepare a Varying Scheme to amend and update the July, 1971, City of Sydney Statutory Planning Scheme.

34. On the question of the desirable degree of concentration or "scatteration" of high density office development in City precincts outside the CBD, the 1971 CSP and Council's FSR Codes make it clear that Council favours "concentration" within a strong lineal Central Spine Business District from Circular Quay directly south to the City Boundary on Cleveland Street, this "Spine" being well served throughout its length by public rail, bus and ferry transport. The only potentially significant deviations from this concept have not sprung from initiatives of the City Council. For example, the over-large County Centre Zone, as well as the Ordinance which permits offices in Light Industrial Zones, both originate in the Statutory Planning Scheme prepared by the SPA. Again, the Woolloomooloo Plan is an SPA product, prepared prior to the election of the new City Council, but in the implementation of which the Council has loyally sought to support the Authority.

#### THE PRINCIPLE OF CONCENTRATING FUTURE PARKING ON THE PERIMETER OF THE CBD

35. The Accessibility Objective of the 1971 CSP puts improvements in public transport at the top of the Council's Policies and Priorities for the City. The Plan itself fully analyses and documents, with the fullest possible statistical support, the kinds of improvements it advocates. However, because public transport is the statutory responsibility of other authorities, the City Council can only "urge, press for, seek and support" action by other authorities. Parking, however, happens to be a statutory responsibility of the Council. The Council accepts this responsibility and has concentrated its practical efforts on developing the policies and implementing the type of more restrictive controls which the SPA and other authorities had been advocating for many years.

36. The overall level of City parking permitted by the Council's 1971 Parking Control Codes, and by subsequent Action Plans (see Annexures D and E), have been related conservatively to the capacity of existing roads and streets serving the City (see Annexure J). Any statement to the contrary reveals a mis-reading or misunderstanding of the several carefully documented City Council publications on the subject of parking. Surveys of traffic capacity and of levels of service on existing streets have been carried out, and it is only from the results of these that present permissible parking capacities have been calculated. Possible future parking capacities have only been

indicated in Council planning documents as being dependent on possible future increases in the capacities of roads serving the City or removing through-traffic which currently uses City streets.

37. Council's Parking Policy is governed by the very specific principle, clearly stated, explained in detail and re-iterated in Council's adopted and published documents, that the maximum permitted total number of visitor and commuter parking spaces within an area must be no more than twice the maximum hourly capacity (after deducting through traffic) of the existing streets actually bringing traffic into the area. The 1971 CBD street capacity at the Outer Cordon was 21,000 vehicles per hour, of which 8,500 were through-traffic leaving 12,500 remaining within the Outer Cordon of the CBD. (See Fig.1, - 1971 Parking Policy and Control Code, and Fig.4 - Action Plan No.4). Thus the maximum parking capacity within this Outer Cordon has been fixed at 25,000, given the road and street system we have to-day. The detailed 1971 Parking Control Code for New Development was formulated on this basis.

38. During 1970 and 1971, Council's officers and Consultants evolved Council's Parking Policy and Control Code in close working liaison with CUMTAC, COSPAC and TAC, their Joint Steering Committee on Parking, and the Working Group on Parking appointed by the Joint Steering Committee of CUMTAC, COSPAC and TAC. The result of this working liaison was a formal letter, dated February 15, 1971, from CUMTAC to the Town Clerk of the Council, confirming that meetings had been held between Council's Consultants and the Working Group on the draft City Parking Policy and Control Code Report, that this Report had been considered by CUMTAC, and that CUMTAC "regards the report as providing an acceptable interim policy to be reviewed in the light of any recommendation flowing from the Transportation Study for the Sydney Region now being undertaken." The Council also received a formal letter from the Authority, dated March 29, 1971, stating that :-

"The concept of fringe parking stations with ready access to the Western Distributor and attractive pedestrian links to the core of the City is endorsed; however, additional parking facilities should be related to the capacity of the lead-in road system as constructed from time to time.

"The concept of providing off-street loading and unloading facilities in all new buildings in the City is endorsed.

"The Council's foreshadowed interim parking policy and code should be subject to review in the light of results of the Sydney Area Transportation Study."

Refinements subsequently made to that draft report prior to its formal adoption by Council on December 6, 1971, had the effect of making it even more restrictive on the density of parking permitted throughout the City, particularly parking permitted to be placed underneath buildings in the central core. Striking statistical confirmation of this is contained in Annexure H hereto.

39. Council's Parking Policy is not intended to define the number and distribution of total CBD Parking by the year 2000. It does, however, explore the possible long-term future amounts and possible future distribution of parking within the City, in the light of probable future road improvements either at present under construction, or planned by the DMR, and for which land is reserved in the gazetted 1971 City of Sydney Statutory Planning Scheme. Stage 1 of the Western Distributor is now almost fully constructed. In June, 1971, the Minister publicly announced that he had approved, and that the DMR would soon begin, construction of Stage 1 of the North-Western Expressway between Pyrmont Bridge Road and Kent Street. The Commissioner for Main Roads has publicly stated that "it is expected that . . . . some of (this) work will be in use by 1975. The associated roads, which will provide for local traffic, are expected to be completed by 1978, allowing Pyrmont Bridge to be closed to traffic."

40. These two projects are the only major roadworks on which the Council has based its plans for parking in the immediate short-term period to 1980. It has been estimated that together, they will increase the net capacity, excluding through traffic, at the Outer Cordon by 3,000 vehicles per hour, and could thus permit the Council to begin to plan for what the 1971 CSP advocates - the provision of future car parking stations directly served by the Western Distributor, to accommodate up to a maximum of 6,000 vehicles, on the CBD perimeter between the Outer and Inner Cordons west of Kent Street, so as to facilitate the gradually increased pedestrianisation of the core of the CBD. This short term future plan for the period up to 1980 is precisely detailed in Council's published Action Plan No. 4, formally adopted by Council on July 3, 1972.

41. Council's 1971 Parking Control Code reduced the total amount of parking developers are to provide for offices from one space per 2,500 sq. ft. to one space per 1,500 sq. ft., or by 40 percent. However, this is not the only reduction made in parking under office buildings. The Control Code further stipulates that only a limited proportion (in some cases, nil) of this requirement is permitted to be placed on-site under the building. The remaining spaces are not to be physically provided by the developer, but are the subject of financial contributions to Council's Parking Funds. These funds are to be used to provide public car parking stations on the

perimeter of Precincts, particularly adjacent to and served by the Western Distributor west of Kent Street, and linked to the CBD core by planned grade separated walkways. Thus, Council plans gradually to shift the bulk of parking out of the CBD core, and onto the perimeter, in accordance with recognised planning principles.

#### THE COMPLEMENTARY CONCEPT OF COMMUTER PARKING AT SUBURBAN RAILWAY STATIONS

42. State authorities have been discussing for some years the possible future provision of commuter car parking stations at suburban railway stations. To date, no feasible locations have been announced, let alone specific plans prepared. Furthermore, State authorities have taken no action to provide such stations on the Eastern Suburbs Railway now approaching completion. The City Council would welcome the provision of car parking at suburban railway stations, if any feasible locations could be determined, particularly on the North Shore line, from which area a good proportion of car commuters come, and from where entry to the City is inhibited by the Harbour Bridge bottleneck. However, any such possible future stations could only be complementary to, and not a substitute for a limited amount of parking on the perimeter of, and immediately adjacent to, the CBD, as planned by the City Council's Action Plan No. 4.

43. As and when the Sydney Region Outline Plan's long-term objective of major sub-regional office centres is achieved, there will be a greater need than ever before for short-term visitor parking on the perimeter of the CBD. One of the penalties of dispersion of industrial development throughout the Region since 1950, has been an enormous growth in cross-metropolitan vehicle-trips. Similarly, the already evident beginnings of office dispersal are producing more and more visitor vehicle-trips between dispersed offices, and between dispersed offices and the CBD. One of the virtues of the concentration of offices within a compact Central Business District is that inter-office trips can be made by walking or by short-haul public transport.

#### FINANCIAL CONTRIBUTIONS TO COUNCIL'S PERIMETER PARKING FUNDS

44. It appears that the Authority agrees with and supports the major element of Council's Parking Policy which limits the permissible quantity of private off street parking under buildings in the core, and of cash levies on developers to help Council pay for the provision of public perimeter parking stations. The Authority endorses this principle in its published Technical Bulletin No. 1 on "Metropolitan Parking Standards" of January, 1971. This endorsement is repeated in Paragraph 12 of the Supplement to the Chief Planner's Report No. 48/72. Many Metropolitan Councils have imposed and collected such levies for some years past, and continue to do so.

45. The fundamental principle behind the granting of limited Bonus Floor Space for cash contributions to Council's perimeter public parking funds is exactly the same basic principle underlying all Bonus FSR systems. This principle is documented at length under Policy 3, and Action Priorities 3A and 3B, on pp 93-95 of the 1971 City Strategic Plan. In brief, it is the use of "sticks and carrots" to ensure that developers play their part in providing the public facilities required to meet the demands placed upon the City environment by the use of their new buildings, whether these be pedestrian underpasses or overpasses, plazas, through site links, escalators, public toilets, branch libraries or perimeter parking stations. The limited FSR Bonus for cash contributions to perimeter parking funds is one such incentive, or "carrot", deemed necessary at this time to soften the blows of the requirements, or "sticks", which :-

- a) drastically cut Basic FSR;
- b) prohibit a developer from providing the parking under his building which his tenants want;
- c) threaten in consequence to either lower his rents or increase his difficulties in letting space;
- d) levy cash contributions on him, and
- e) in consequence, may lower his land value, his potential development value and his profitability.

The economic calculation of the relationships between cash contribution and amount of Bonus Floor Space in each Precinct has been carefully investigated by Council, and is being kept under continuing review - see Annexure G hereto, Report on "Financial Contributions to Council's Parking Funds in return for FSR Bonuses in certain Precincts" as adopted by Council on May 8, 1972.

46. It is true that if the 1971 FSR Control Code did not grant any Bonus Floor Space for such contributions, then the overall average achievable FSR would be even lower. But then, the degree of acceptance of the entire FSR Control Code, and the reductions it already imposes, would correspondingly be lowered, probably below the point of survival.

47. Council began to apply the provision of the new Parking Code, and to levy financial contributions for required spaces not permitted on-site, on new, renewed and amended Development Consents issued from the beginning of 1972. It would obviously be unreasonable if Council were to expect all of the City's future parking funds to be provided by the relatively small proportion of developments involved. Equity requires that all existing City buildings, which will also benefit either directly or indirectly by

the provision of short-term and long-term perimeter parking, should also contribute, as should also those individuals who use public parking already provided in the City, either at metered street spaces or in Council-owned and operated Public Parking Stations.

48. It was with these considerations in mind that Council resolved on July 3, 1972, to allocate to Council's Parking Fund "such other sources of revenue as Council may from time to time determine", specifically including "the net proceeds from the sale of surplus street and land space" under street rationalisation schemes. Under Action Priority 7C on pp 111-112 of the 1971 City Strategic Plan, and on pp 39-42 of Annexure E hereto, Action Plan No. 4, other possible sources of revenue have been reviewed by Council's Consultants for Council's consideration. One of these is an increase in the basic Parking Meter charge, which has not been raised from 5 cents since the first introduction of parking meters seventeen years ago. Another is the levying of a special parking rate on non-residential areas, as is the practice of other metropolitan Councils.

#### MEASUREMENT OF TOTAL FLOOR AREA FOR DENSITY CONTROL PURPOSES

49. On the question of the methods of measuring Total Floor Area, the City Council and its Consultants spent twelve months in detailed research and consultations. We began by holding the view that the Chief Planner has recently expressed, but after full investigation, we were satisfied that Total Floor Area should be measured, and so defined it in the adopted 1971 Codes, as, inter alia :-

- a) within the inner faces of the external walls at a height of 4'6" above the floor;
- b) including the space occupied by internal walls, staircases, lobbies, corridors and toilets;
- c) excluding the horizontal cross sectional area of lift shafts and vertical service ducts measured between the wall faces internal to the lift shaft or duct.

50. It is agreed that the essential purpose of Floor Space Ratio Control is to control the density of people either in residence, in the workforce, or in other activity. People can only occupy actual usable floorspace. Therefore it does not seem logical to measure spaces not normally used by people. BOMA has strongly pressed this view, carrying it to its logical conclusion by urging that only Net Lettable Space be measured. The City Council and its Consultants, however, could not agree to this, because of :-

- i) the danger of abuse - of spaces being converted from one purpose to another use after construction;
- ii) because of the practical administrative difficulties of agreement on what to deem "net lettable" space in particular schemes where internal partitions are rarely finally determined until after the structural shell of a building is finished, and are even then subject to change in future years.

51. Council and its Consultants sought, obtained and examined plans and statistical data concerning the percentage of the overall envelope of particular building types and specific buildings occupied by particular building elements. The City Building Surveyor and his Deputy, members of the HOBAC Technical Committee, architects, engineers and building economists, were consulted extensively. It was finally determined that any finally adopted definition of Total Floor Area must :-

- a) be administratively practical;
- b) not be open to abuse by applicants for Development Consent;
- c) include all spaces capable of occupancy and use, or later conversion to usable floor space;
- d) overcome the existing practical measurement problems, difficulties, ambiguities and ad-hocery which result from attempts to precisely measure the thickness of external walls, columns and spandrels;
- e) encourage, and not discourage or inhibit, freedom for architects to design sculpted facades where appropriate, so as to reduce the "cigar box" criticism levelled at the flat and thin skinned building form which is typically produced when every square foot of wall thickness means a financial loss in rentable space;
- f) encourage, and not inhibit, the provision by developers of the highest possible standard of the vertical public transport systems represented by lifts;
- g) encourage, and not inhibit the provision of the highest possible standards of the "life-support" systems of mechanical services, and even to encourage the provision of spare vertical duct capacity to allow for additional future needs, so as to reduce the future rate and extent of building obsolescence.

It was also agreed that the two questions of the best method of measurement, and of permissible FSR, must be treated as two entirely separable matters. It was agreed that if the finally



adopted methods of measurement involved an average percentage reduction on previous methods, then Floor Space Ratios should be correspondingly cut.

52. Having regard to evidence studied under each of the requirements (a) to (g) above, the definition adopted by Council, and now recommended to the Authority by the Council for eventual general use throughout the State, is as follows :-

"Total Floor Area" means the sum of the gross horizontal areas of each and every floor of a building contained within the inner faces of the outer walls measured at a height of 4'6" above the floor, including the space occupied by internal walls, staircases, lobbies, corridors, and toilets, but excluding the horizontal cross sectional area of lift shafts and vertical service ducts measured between the wall faces internal to the lift shaft or duct and excluding any space permanently set aside within the building for the parking, unloading or loading of vehicles, including ramps or other means of access thereto, or for the accommodation of mechanical or electrical plant or equipment servicing the building.

53. Because this can result in a percentage difference of approximately 6 to 10% on the previous definition (see Annexure H), the Basic Floor Space Ratio in the Tank Stream and Mid Town Hub Precincts for sites larger than 12,500 sq. ft. was cut from 6.0 to 5.5. Basic FSR for smaller sites was cut even further, down to 3.0.

54. In all considerations of what are acceptable Basic and acceptable Maximum FSRs for a Precinct, the relative degrees of difficulty of gaining the defined Bonuses should be carefully studied. The City Council believes that the Bonus elements of the 1971 FSR Codes are so tightly defined that the ultimate overall actual FSR achieved under those Codes will be substantially less than the Maximum theoretical limits stated in the Codes.

55. It should also be noted that the average area of floor space per employee in office buildings appears to be increasing at a rate which could be as high as 2% per annum. The significance of this is that the total future workforce per unit of FSR is likely to fall substantially over future years.

#### COUNCIL'S FSR CONTROL POLICY AS RELATED TO HOTELS

56. It is difficult to believe or accept that the administrative details of Floor Space Ratio Control for "International Hotels" in the City should be matters of regional concern which should

take up the valuable time and scarce resources of the SPA. Nevertheless, since the subject has been raised, the City Council's attitude is explained below:

57. The economic problems of a hotel on a site of its own, in a Precinct where almost all allowable FSR may be used for office purposes, are most fundamentally those of operating costs related to revenue. As operating costs, including land taxes and rates, rise faster than gross revenue, hotel and similar non-office uses become less profitable and more sensitive to displacement. Enquiries during 1971 indicated that the optimum sizes for central City motels and hotels appeared to fall into three categories - of approximately 200, 400 and 600 bedrooms respectively. When rates and taxes on the UCV are added to normal operating costs, and if these have to be absorbed wholly by a motel or hotel on a site of its own, the economic feasibility of new projects becomes increasingly difficult. Limitless Floor Space Ratio for motel or hotel purposes is simply not any help in these circumstances.

58. Commonwealth and/or State Government concessions and subsidies to the international tourist industry, as currently being requested by ANTA, appear to be the first basic need. Council has resolved to support these requests under Action Priority 10C of the 1971 CSP. Under Action Priority 10D, Council undertook to investigate the practicality of adjustments to zoning techniques and of Land Tax and Rating systems to assist retail, hotel, theatre and tourist land uses to continue to operate and to expand in the City. These matters are discussed on p.130 of the 1971 CSP. Council has not yet had an opportunity to carry out these investigations.

59. The 1971 CSP sought to encourage hotels, motels, convention facilities (defined under the term "Place of Assembly"), retailing, entertainment and residential uses in many Precincts of the City. In the Mid Town Hub Precinct, for example, the FSR Code prohibits the use of more than 50% of the floor space in any project for offices. It is hoped that the Valuer General will take this restriction into account when next fixing the UCV of land within this Precinct so that the impact of rates and land tax on the operating costs of non-office uses will be reduced.

60. The 1971 FSR Code also seeks to provide opportunities for motels, hotels, with or without convention facilities, and residential accommodation to be given an opportunity to compete with offices for the attention of developers in the Tank Stream and Brickfield Hill Precincts. The Code for these Precincts gives an FSR bonus of 1 for projects on sites of 20,000 sq. ft. or more which contain 200 or more bedrooms. The Code further grants

an FSR bonus of 2 for projects on sites of 40,000 sq. ft. or more containing 400 or more bedrooms. Additional bonuses are granted for space set aside for convention facilities, shops, restaurants, taverns, theatre restaurants, etc. The Code makes it relatively easy for projects containing more than 400 bedrooms, together with ancilliary facilities that might justify the mystic title of "International Hotel", to achieve FSRs of 10.5 in the Tank Stream and Mid Town Hub Precincts and of 11 in the Brickfield Hill Precinct. Such projects must be on sites of 40,000 sq. ft. or more. However, on a 40,000 sq. ft. site, a 400 bedroom hotel could be developed within an FSR of 3, 4 or 5, depending upon the lavishness of space standards. Thus, a plot ratio of 5, 6 or 7 remains available on the site after the hotel has been provided. This may, in the Tank Stream and Brickfield Hill Precincts, be used entirely for offices which can help the hotel component to more easily bear the burden of operating costs. Such mixed developments could readily be designed as "twin tower" projects, such as the Westfield Hotel and office development now under construction on William Street.

61. The 1971 CSP envisaged that hotels and motels might successfully be encouraged to develop along both sides of the William Street boulevard and the Oxford Street boulevard proposed by the Strategic Plan. These strips are felt to be particularly suitable for hotel and motel uses. Land values are here lower, and demand for office space considerably less, than in the Central Business District. Hotels on the William Street boulevard would be well located for visitors, halfway between the entertainments of Kings Cross and the CBD. Oxford Street is on a ridge which commands good views, is within easy striking distance of the CBD and is on the way to and from the airport and the sporting facilities at Moore Park. It is not without significance that the first major post-war redevelopments on both Oxford and William Streets are for hotels, motels and airline facilities.

62. It is hoped that current action planning processes for both William Street and Oxford Street will resolve the difficulties of development control in both these locations. Each was difficult to deal with effectively during 1971. The Oxford Street Precinct was zoned "County Centre" by the 1971 Statutory Plan as was the northern side of William Street. The southern side of William Street is still zoned "Residential 2B". What may be required, for both sides of both future boulevards, is an intermediate zoning which will make it possible for the Council to refine Floor Space Ratio controls more specifically to the particular problems and opportunities (e. g. the implementation of the boulevard concept) that each presents.

63. The City Council wishes to adhere to the principle that Floor Space Ratios should be regulated by precise mathematical

codes so that areas of so-called "discretion", or what may be more accurately termed "haggling", can be reduced to a minimum. It is felt that once a specific exception is made for one particular building type, special pleas for other building types will follow, leading to confusion.

#### THE COUNCIL'S 1972 ACTION PLANNING PROGRAMME

64. It is desired to inform the Authority of some of the technical work currently being undertaken by Council on subjects raised by the Chief Planner, and some relevant and important decisions made by Council subsequent to the dates of the Chief Planner's Reports, and hence not previously available for the Authority's consideration.

65. Significant progress is being made in technical work on a further 23 detailed Action Plans for completion in 1972-73, many of which involve the researching in detail of particular problems raised, and criticisms made, in the Chief Planner's earlier Reports, such as Floor Space Ratio Controls in Light Industrial Zones, the capacity of the city street system, and parking policies; as well as other important priorities such as the extended pedestrianisation of the city core; the techniques of achieving historic building preservation; and improved procedures and standards for the examination and screening of Development Applications, as a result of the progressive implementation of the Strategic Plan's Action Priority 1E regarding the reconstitution and strengthening of the City's own Planning Department.

66. It is further relevant to mention the adoption by Council on July 3, 1972, and subsequent publication of the City's Action Plan No. 4, which details some of Council's further technical investigations into the capacity of the City street system, and Council's decisions on means of beginning to concentrate most future new Central Business District parking on the fringe west of Kent Street adjacent to the Western Distributor, to facilitate the extended pedestrianisation of the CBD. A useful conference on this subject, between representatives of Council, HOBAC and COSPAC, including representatives of their Technical Sub Committees, the Authority's Chief Planner, Council's own Staff and Consultants, was held in the Town Hall on November 7. COSPAC members praised Council's Parking Control Code as being of the highest world standards. The question of how much should be allocated for short term parking, and how much all day parking, was discussed, as was also the question of how to control or police decisions of this sort. Investigations are continuing. The City Council's Consultants are preparing a report on the problem.

67. It is important for the Authority to note that specific proposals for car parking on the western perimeter as determined by Council's adoption of Action Plan No. 4 cover only the short-term period to 1980, pending the preparation, adoption and the hoped-for beginning of effective implementation of specific longer term regional policies and projects regarding improved public transport and more precise data on practicable long-term future modal split, for information on which we await the results of SATS.

#### THE 1974 CITY OF SYDNEY STRATEGIC PLAN

68. I am also pleased to inform the Authority of the City Council's decision to comprehensively review and revise, for publication by mid-1974, the 1971 City Strategic Plan. The necessity for this review and revision was foreseen and foreshadowed on page 70 of the 1971 Plan. It will now be conducted in the light of such new factors and subsequent events as :-

- a) The greatly heightened public awareness, appreciation and knowledge of urban planning problems and opportunities, in the creation of which the 1971 City Strategic Plan has itself been, as was intended, a significant generating force and catalyst;
- b) The longer term implications of the emerging data and results of SATS, to which the 1971 City Strategic Plan was itself an input, and which can now in turn receive inputs from SATS;
- c) The current over-supply of office space, and the consequent likely postponement of office projects not yet commenced, for the next 5 to 8 years, which appears already to have affected many proposals, including schemes for the Rocks and Woolloomooloo areas;
- d) New data now available to Council's Consultants from surveys only recently completed, which indicate that the City office workforce may actually have fallen slightly between 1969 and 1972, and indicates that the Council's Consultants lower projected CBD workforce growth rates of between 0.7% and 1.3% per annum are likely to apply during the next 8 years;
- e) New data becoming available from the Council's own action planning program, and other private and governmental sources including the 1971 Census and the 1969 Economic Census;
- f) Inputs to be requested from the SPA itself of new research data and regional policy guidelines relevant to the City's role in the Region, in more precise terms and specific detail than was able to be incorporated in the 1968 Sydney Region Outline Plan or made available to Council

during the preparation of the 1971 City Strategic Plan;

- g) The possible future significance of recent new initiatives and decisions by State and Federal Government regarding public transport and selective decentralisation;
- h) The outcome of further consideration and action by Council and the SPA, together with other relevant bodies regarding such matters as amendments to the City Statutory Planning Scheme Ordinance and Map, and simplified procedures for the processing of Development Applications, the desirable balance to be sought between short term and all-day parking, practicable techniques for achieving this balance, parking meter and other parking charges, the possible long-term phasing out of parking meters, alternative methods of raising finance for car parking purposes, the implementation of further pedestrianisation proposals in the CBD and elsewhere, practical legal techniques to ensure the preservation of historic buildings, and a detailed residential development control code for the City.
- i) New advice and guidance to be requested from CUMTAC, SATS and the new Public Transport Commission.

#### ADMINISTRATIVE DIFFICULTIES AND DELAYS UNDER THE 1971 STATUTORY PLANNING SCHEME

69. A number of administrative difficulties and delays have been aggravated by the gazettal of the 1971 City of Sydney Planning Scheme Ordinance. Some of these can be resolved immediately by simple rearrangement of procedures at staff levels of the Authority and the Council. The resolution of others requires amendments to the Planning Scheme.

70. On November 8, 1971, the City Council resolved to prepare a Varying Scheme to amend and up-date the City of Sydney Statutory Planning Scheme gazetted on July 16, 1971, in the light of the City of Sydney Strategic Plan adopted by Council on August 2, 1971. The formal procedures required by the Local Government Act subsequent to the passing of such a Resolution have been complied with.

71. It is foreshadowed that the City Council will, by way of a Varying Scheme, be submitting to the Authority proposed amendments to the Scheme. In particular, these

will cover proposed amendments to the Ordinance, including the amendment of certain definitions, amendments to the land-use Tables, and amendments to the provisions dealing with existing buildings and existing works in Part IV of the Ordinance.

72. The procedures involved in the preparation, examination and gazettal of such a Varying Scheme will be complex and will inevitably take considerable time. Meanwhile, it is recommended that the Authority resolve to authorise administrative directives which would immediately simplify and streamline currently inefficient administrative techniques in the development control process.

73. The current techniques and procedures of conducting consultation with, and obtaining the concurrence of the Authority to particular classes of Development Applications are the ones most needing simplification. This matter is urgent and should be dealt with without delay.

74. The concept that some classes of Development Applications could be of regional significance, and therefore should be referred to the regional authority, was first incorporated in the 1951 County of Cumberland Planning Scheme Ordinance. Clause 43(1) of the County Scheme Ordinance provided that some classes of Applications must be referred to the regional authority for an expression of opinion, which had to be considered by the Council, but which left a decision on the Application to the Council. Other classes of Applications could not be granted consent without the concurrence of the regional authority. These latter classes were :-

- a) all development on land having frontage to a main road or a county road - except residential development not comprising more than 4 flats.
- b) all development on land with frontage within 300 ft. of a main road or county road, except residential development not comprising more than 4 flats.

75. In September, 1957, the Cumberland County Council, recognising the need for the efficient handling of Development Applications, advised the Council that :-

"If consultation under those provisions were to involve the submission of every case to the County Council in order to obtain formal expression of its view, determination of applications within the period of 40 days prescribed would be difficult to

achieve. It is therefore desirable to introduce some form of consultation which will both facilitate the speedy determination of applications and, at the same time, will meet the practical requirements for consultation in regard to the different types of development concerned. "

The outcome of this was the introduction of a form of consultation to quickly and efficiently settle applications made under Clause 43(1) of the County of Cumberland Planning Scheme Ordinance. This resulted in consultation with the Cumberland County Council, through an officer authorised to concur on behalf of the regional authority, and later by means of assumed concurrence.

76. Under the County Scheme Ordinance, consultations and concurrences were handled quickly and efficiently, both with the County Council and with the Authority as its successor in the period 1964-1971. The situation altered markedly with the 1971 gazettal of the City of Sydney Statutory Scheme. Clause 35(1) of this Ordinance requires the concurrence of the Authority not only to all development on a main or county road, or within 300ft. of such a road, but also to four additional classes of Applications:-

- \* any commercial premises with a total floor area of more than 20,000 sq. ft.
- \* any development to be used wholly or partly as a shop, where total floor space exceeds 15,000 sq. ft.
- \* any development for the purpose of heliports, aerodromes or airports.
- \* any development on land between Billyard Avenue and the foreshore of Elizabeth Bay.

77. Great areas of the City are now either on or within 300ft. of a main or county road, within which all Development Applications, even minor ones for change of use, must receive the concurrence of the Authority. It will also be appreciated that even relatively small developments for the City commonly contain more than 20,000 sq. ft. of commercial floor space or else contain a shop and comprise more than 15,000 sq. ft. The greatly increased volume of such Applications requiring concurrence will be appreciated.

78. It has never been explained why the Ordinance specifically prohibits Council control of development over the 13 residential lots between Billyard Avenue and the foreshore at Elizabeth Bay. These 13 lots are subject under the



Statutory Scheme to a Foreshore Building Line and to a Height Limit of 50 feet above Standard Datum. Billyard Avenue itself is at RL 45 for a considerable part of its length, and falls to RL 15 at Ithaca Road.

79. The Council appreciates the action taken by the Authority in August, when it completely waived the requirement to consult, and granted the right to assume concurrence under Clause 35(1) (a) to (d) inclusive, within the County Centre Zone, except where concurrence is required under Clause 59.

80. By letter dated August 27, 1972, the Authority indicated to the Council that the Authority agrees that further action to reduce needs for consultations and concurrences is necessary.

81. Clause 59 of the Ordinance still requires the City Council to obtain concurrences by the Authority to all development inside the County Centre Zone in areas shown on the Scheme Map by broken blue edging and also in all areas zoned Residential 2(d), 2(e), 2(f) and 2(g). The areas within the County Centre Zone comprise :-

- a) all the land north of Bridge Street to Circular Quay, for which the Authority has long since completed a detailed plan for the control of development on privately owned land;
- b) the area off Railway Square bounded by George, Hay and Thomas Streets, together with a small area adjacent to the Southern Expressway, Broadway and Wattle Street, which are in the Ultimo Precinct A8, for which Council is currently preparing a detailed development control plan as part of Action Plan No. 9 for 1972;
- c) Woolloomooloo, for which the Authority has prepared a detailed plan which has been accepted by the Council, and which Council is reviewing and revising under Action Plan No. 7, the Project Director of which is Council's Principal Operational Planning Officer, Mr D. Daines.

The Residential areas within the City affected by Clause 59 are the tiny piece of 2(d) Zoning on the Pyrmont peninsula, another small area of 2(d) Zoning next to RPA Hospital, and the 2(e) Zoning atop the King's Cross Road Tunnel.

82. The Authority's letter of August 27, 1972, referred to in paragraph 80 above, stated that "when a detailed plan has been prepared and approved by the Minister for these areas (as described in Paragraph 81 (a), (b) and (c) above), steps will be taken to reduce, if not to eliminate, the necessity for consultation in those areas". It should be noted that Clause 59 makes absolutely no reference to any need for any plans of any sort to be approved by the Minister.

83. The City Council asks: Why should steps not be taken now? Detailed controls over privately owned land north of Bridge Street, have already, to the best of Council's knowledge, been devised, and maximum heights have been determined by the Minister. The Authority's development control criteria for this area could be simply codified, and the Council authorised to assume concurrence if the Authority's stated requirements are observed. Similar action could be taken with regard to the Ultimo areas, and to Woolloomooloo.

84. The absurdity of current procedures under Clauses 35 and 59 of the 1971 City Scheme Ordinance can be demonstrated by reference to many cases which simply waste the time of both the Authority and the Council. One typical example is as follows :-

Development Application for Change of Use from a cafe to a shop for the sale of fishing tackle at 16-18 Quay Street, Haymarket, involving alterations to shopfront and awning costing \$3,000.

Concurrence Required under Clause 59.

Date of Receipt of Development Application by Council,	<u>July 12, 1972</u>
Referred by Council to SPA,	<u>July 18, 1972</u>
Receipt of Reference Acknowledged by SPA,	<u>July 31, 1972</u>
Concurrence given in letter from SPA dated,	<u>October 26, 1972</u>
Council Consent granted under powers delegated by Council to Council Staff,	<u>November 8, 1972</u>
Time taken by SPA to give concurrence,	<u>3 months 1 week</u>
Total time taken to issue Consent,	<u>4 months</u>

It is submitted that all cases of this and similar kinds under Clauses 35 and 59 are a waste of time for both the Authority and the Council, force unnecessary delays onto Applicants, and tend to bring the development control processes as a whole into disrepute.

85. The greatest number of references to the Authority for concurrence arise from Clause 35(1) (a) and (b), which cover development on or within 300ft. of main or county roads. Not infrequently, the Authority's formal written replies to such references deal with matters which have nothing to do with main or county roads, traffic or traffic access. The Authority's formal replies often refer to zoning aspects of the Application, or to the landscaping of the site. In some instances, the Authority's formal replies do not answer the basic question of whether or not concurrence is granted, thus necessitating the further paperwork of a further referral. Needless administrative work could be avoided if the number of matters to be referred for concurrence could be severely curtailed, and if the Authority's answers to the remaining referrals could be kept to the point.

86. Another source of unnecessary paperwork is the stipulation under Clause 37(3) of the 1971 Ordinance which voids Consents granted under that particular Clause, if the development to which a Consent refers is not substantially commenced within twelve months of the date of the Consent. It is important to distinguish the difference between the voiding of new consents (issued after the date of gazettal of the Ordinance, July 16, 1971) under Clause 37(3), and the voiding of old consents (issued prior to July 16, 1971) under Clause 65 of the Ordinance. The purpose of Clause 65 has now been achieved. All Consents issued prior to July 16, 1971, have now either lapsed under Clause 65, or have been renewed under Clause 37.

87. It is therefore timely to consider whether the period of twelve months stipulated under Clause 37 is a fair and reasonable time within which to expect an Applicant to proceed from Council's Development Consent, through the obtaining of other approvals, through the process of complete contract documentation, the obtaining of Building Approval, the negotiation of a Building Contract, and the substantial commencement of a building.

88. The City Council believes that Clause 37 should be amended to stipulate a period of twenty four months, for two reasons: firstly, such a period is more reasonable in the light of the considerations referred to in Paragraph 87 above, and further, such an amendment would reduce the amount of administrative duplication required if most consents have to be resubmitted, re-examined and re-issued every twelve months.

## RECOMMENDATIONS

In the light of the considerations stated in this Report, it is RECOMMENDED :-

- 1) That the Authority congratulates the Council of the City of Sydney on its initiative in producing the City of Sydney Strategic Plan;
- 2) That the Authority approve in principle the Development Control and Floor Space Ratio Control Code and the Parking Policy and Parking Control Code adopted by the City Council on December 6, 1971, subject to their review upon the completion of the 1971-74 Sydney Area Transportation Study and the 1973-74 review and revision, by the Sydney City Council, of the 1971 City of Sydney Strategic Plan and associated Development Control Codes;
- 3) That the Authority give assistance to the Council of the City of Sydney in the Council's scheduled 1973-74 review and revision of the 1971 City Strategic Plan and associated Development Control Codes, by contributing inputs of all available research data and information on regional policy guidelines relevant to the City's role in the Region.
- 4) That the Authority supports the principle that the appointment of a Representative of the Council of the City of Sydney to the County of Cumberland Passenger Transport Advisory Committee would assist in achieving coordination of planning for the metropolitan centre and for the Sydney Region.
- 5) That the Authority advise the Minister for Local Government that the Authority believes it is now appropriate to reappraise the Height of Buildings Act 1912-67 in order to devise improved arrangements and procedures for development control under the Act.
- 6) That the Authority take the necessary steps to achieve adoption throughout the State of the following definition of Total Floor Area for the purposes of calculating Floor Space Ratios:

"Total Floor Area" means the sum of the gross horizontal areas of each and every floor of a building contained within the inner faces of the outer walls measured at a height of 4'6" above the floor, including the space occupied by internal walls, staircases, lobbies, corridors, and toilets, but excluding the horizontal cross sectional area of lift shafts and

vertical service ducts measured between the wall faces internal to the lift shaft or duct and excluding any space permanently set aside within the building for the parking, unloading or loading of vehicles, including ramps or other means of access thereto, or for the accommodation of mechanical or electrical plant or equipment servicing the building.

- 7) That the Authority request the Council of the City of Sydney to give priority to those parts of Council's Action Planning Programme which will enable Council to prepare and submit to the Authority for consideration such revisions as the Council may deem appropriate to the Development Control and Floor Space Ratio Control Code adopted by Council on December 6, 1971, regarding Precincts A9 (Railway), B1 (Oxford Street), B2 (South Side, William Street), B3 (Stanley Street), B4 (Woolloomooloo), C1 (West Surry Hills) and C2 (Flinders Street).
- 8) That the Authority authorise a senior staff officer to prepare, in conjunction with the City Council's City Planner, recommendations regarding desirable amendments to the 1971 City of Sydney Planning Scheme, with particular regard to amendments which would simplify or improve the processes of development control under the Scheme Ordinance.
- 9) That pending the determination by the Authority and the Minister of any recommended amendments to the City of Sydney Planning Scheme, the Authority authorise a senior staff officer to act in the name of the Authority in the processes of consultation, the making of representations and the granting of concurrences in accordance with Clauses 35 and 59 of the City of Sydney Planning Scheme Ordinance.
10. That the Authority take action to widen the existing spheres of assumed concurrence and non-necessity to consult under Clauses 35 and 59 of the City of Sydney Planning Scheme Ordinance.
11. That the Authority recommend to the Minister that immediate action be taken to gazette an amendment to Clause 37(3) of the City of Sydney Planning Scheme Ordinance so as to delete the words "twelve months" and replace them with the words "twenty four months".

**THE PROCESSES OF STRATEGIC AND ACTION PLANNING,  
AND OF DEVELOPMENT CONTROL, INITIATED BY THE  
COUNCIL OF THE CITY OF SYDNEY**

**ANNEXURE K**  
**PLANNING FOR THE CITY OF SYDNEY 1947-1971**  
**- THE ORIGINS OF RECENT PROBLEMS, THE AUTHORITY'S**  
**CONTRIBUTION TO THEM AND THE CITY COUNCIL'S**  
**APPROACH TO THEIR RESOLUTION**

**REPORT TO THE STATE PLANNING AUTHORITY BY  
ALDERMAN LEO PORT, BE, FIE AUST, M CONS E AUST,  
REPRESENTATIVE ON THE AUTHORITY OF THE COUNCIL  
OF THE CITY OF SYDNEY**

**NOVEMBER 17, 1972**

## PLANNING FOR THE CITY OF SYDNEY 1947-1971

### - THE ORIGINS OF RECENT PROBLEMS, THE AUTHORITY'S CONTRIBUTION TO THEM AND THE CITY COUNCIL'S APPROACH TO THEIR RESOLUTION

1. In 1947, the then Sydney City Council first began to prepare a Statutory Planning Scheme for the City of Sydney. Unfortunately, there followed two decades of virtually complete failure to plan positively or effectively for the City.
2. This lack of positive activity with regard to planning for the City was shared by all authorities concerned, the then City Council, the then Cumberland County Council, the then Town Planning Branch of the Local Government Department, and the Minister's then Town and Country Planning Advisory Committee.
3. The post war planning efforts of Metropolitan and State authorities have tended to be pre-occupied with the problems of controlling and shaping outward metropolitan growth and tended to leave the City in the "deferred" or "too hard" basket. Regional and State authorities led Councils to believe that the statutory planning processes of Part XIIA of the Local Government Act could be relied upon to cope with planning problems and needs. Following the submission by the City Council of its Draft Planning Scheme to the Minister in December, 1958, the initiative in city planning was lost by Council until 1970, when Council unilaterally decided to depart from the discredited statutory processes by preparing the 1971 City of Sydney Strategic Plan.
4. City development was relatively quiescent during the Depression and World War II and for many years after 1945. Little attempt was made to survey or research the highly complex functioning and newly emerging development patterns of the City of Sydney. Some data-collection and tentative analysis began to be undertaken in the 1960s, mostly by developers, consultants and academics. As was pointed out in the 1971 City of Sydney Strategic Plan (Annexure B - Principal Statistical Sources), it is paradoxical that Sydney, the Nation's premier City, has been the one about which least has been known, at least by official planning authorities.
5. Over the twenty five year period 1946-1971, there remained a relative vacuum of research, policy formation and co-ordinated planning and development control for the City of Sydney, except, it may be said, for the body of "case law" formulated in decisions on Appeals by the Land and Valuation Court. This applied to both the principles and details of such basic matters as zoning, the changing amounts and proportions of floor space in different uses, the degree to which new built space exceeded demolished space, the purposes and techniques of building bulk and/or density control, the changing size, composition and space standards of the existing workforce, accessibility in general, and public transport, pedestrian circulation and parking in particular.

6. Over this period, a number of ad-hoc stop-gap measures were taken in attempts to ease development control problems. Those most relevant in this context were the establishment of the City of Sydney Parking Advisory Committee (COSPAC), and the Height of Buildings Advisory Committee (HOBAC). These were initially established as ad-hoc committees with limited purposes, but each has since expanded its functions so as now to completely duplicate the work of the Council and to some degree the Authority itself.

7. COSPAC was first established under new sections added to the Local Government Act in 1955, when parking meters were first introduced in Sydney. COSPAC's major statutory function was the exercise of a veto power over Council with regard to the location and provision of parking meters. It was only in 1965 that the Act was further amended to give COSPAC veto power over Development Applications involving parking stations. COSPAC has dealt with particular detailed matters concerning specific cases involving the installation of meters; and the location, size, detailed design and operation of particular public parking stations. It was left for the Council in 1971 to produce and adopt a comprehensive parking policy and control code for the City as a whole. Council now feels that as and when Council's Parking Code is accepted by other authorities, that COSPAC's role as an additional development control authority will diminish, if not disappear.

8. The 1957 amendments to the Height of Buildings Act of 1912 gave HOBAC opportunities widely to extend its purview, and the grounds upon which it could exercise a veto power over tall buildings which even the Minister could not over-ride. These grounds were extended well beyond the questions of height and safety with which HOBAC was originally intended to deal. HOBAC was established, and its present powers given to it, many years before the Authority itself was created. To-day, 14 years later, the Council and the Authority have progressed far with a statutory scheme, a strategic plan, and codified Development and Floor Space Ratio Control Codes as well as Parking Control Policies and Codes. HOBAC is now duplicating the functions of the Council and the Authority as development control authorities. This duplication of functions is imposed upon HOBAC by Section 4C(a) which was added to the Act in 1957.

9. Over the years since 1957 and 1965, HOBAC and COSPAC have been able to influence and modify the form of many specific development proposals and other particular projects referred to them.



10. But despite the invaluable work they have done, and the vital stop-gap role they have played, they could not, or did not, assume the functions of positive City policy and action planning, nor of producing detailed and precise zoning, development control and parking codes and performance standards for both general and particular application throughout the City.

11. In consequence, the magnitude and speed of the City (and North Sydney) office building boom of the second half of the sixties, the culmination of which we are now experiencing, caught the entire planning system sadly unprepared.

12. The two single most important planning issues within the City of Sydney since 1951 have been :-

- a) the extent and boundaries of the so-called "County Centre" Zone, within which virtually any use is permissible, and/or the areas within which large commercial office buildings may be permitted.
- b) the Floor Space Ratio (FSR) controls to be applied within these areas.

13. The 1951 gazetted Cumberland County Planning Scheme zoned as "County Centre" not only the core and the frame of the Central Business District, but also the whole of East Sydney, most of Surry Hills, and all of Pyrmont, Ultimo and Chippendale, giving the "County Centre" Zone an area of well in excess of 1,000 acres, or almost 2 square miles.

14. In 1964, towards the end of his term of office as Minister for Local Government, The Hon. P.D. Hills, MLA, requested the SPA to finalise the City Statutory Scheme for gazettal. This work occupied the SPA and the subsequent Minister's advisors for some years. The Scheme Map and Ordinance were not finally gazetted until July 16, 1971.

15. The 1971 Statutory Planning Scheme, when finalised by the SPA, was completely unsupported by any published report giving any data or analysis of the City's roles and problems, let alone any objectives, policies, concepts, ideas or reasoning on which it might have been based, or by which it might be either examined, justified, criticised or defended by any other authority or by the interested public.

16. The 1971 gazetted City Statutory Scheme confirmed the zoning of a very large area of 540 acres as County Centre, within which virtually any use was permissible. This area covered not only the CBD between the Sydney Harbour Bridge and Central Railway, but also extruded eastward to cover the whole of Woolloomooloo up to Victoria Street, and the whole area on

both sides of Oxford Street up to Taylor Square between Liverpool and Campbell Streets. The gazetted Ordinance included an amended provision making office buildings permissible in Light Industrial 4b Zones. The total area in which pressure could be exerted to permit major office buildings was thus not very significantly reduced from the original "County Centre" Zone of the gazetted Cumberland Scheme.

17. It will be appreciated that where office building is permissible under Ordinances prepared and legally gazetted by State Government Authorities, it is most difficult for a Local Government Authority, whose decisions are subject, not only to being over-ridden by State Authorities and Committees, but also subject to judicial appeal, to refuse such Applications. Indeed it should be noted that the City Council in office in the early nineteen sixties, did in fact refuse a number of such Applications in the then County Centre Zone on the fringe of the Central Business District, but Council's decisions were almost universally reversed on appeal.

18. Turning now from the first most important issue, of the area of the City within which office development was and is permissible under Statutory Schemes prepared by regional and State Authorities, to the second most important issue, of the particular Floor Space Ratio controls to be applied within those areas, it is necessary to note the work of HOBAC and of the SPA on this problem.

19. HOBAC succeeded in reducing the standard Floor Space Ratio throughout the "County Centre" Zone from 15 to 12. HOBAC later tried to set a Basic FSR of 10 for small sites, with an increase to 12 for larger sites where some token pedestrian facilities could be provided. Nevertheless, property owners and developers continued to believe, and indeed to insist, that an FSR of 12 was theirs as of general right. These attitudes by property owners and developers hardened and became ingrained. They are only now beginning to falter as a result of the publication of the City Council's City of Sydney Strategic Plan on July 21, 1971, and the adoption of the City Council's Floor Space Ratio Control Code on December 6, 1971. Such attitudes defeated efforts by the SPA in the late 1960s to gain political and public acceptance and support for an FSR formula which while reducing Basic FSR to 6, gave generous and simple bonuses which would continue to allow a maximum of 12 throughout the "County Centre" Zone. As the Authority's Chief Planner, perhaps ruefully, states in his Report No. 9/72 of January, 1972: "It must be recognised ... that action to drastically reduce densities probably cannot proceed too far ahead of public acceptance by landowners and developers".

20. The failure of the SPA in 1968-70 to gain agreement to any reduction in Basic Floor Space Ratio was perhaps not unconnected with the fact that no report on the subject of City planning or development was ever published by the SPA giving data, analysis, evidence and reasoning in support of proposals for reductions in Basic Floor Space Ratio, or in support of the over-simple and ill defined Floor Space Ratio Bonus provisions, which were criticised as such equally by such organisations as the Royal Australian Institute of Architects and the Building Owners and Managers Association. It must, however, be acknowledged that the SPA must concentrate its resources and abilities in the field of State-wide and regional planning, and cannot be expected to carry the workload of, or to be equally proficient in, such complex matters of city centre detail planning.

21. Between 1967/68 and June, 1969, more than two years prior to the finalisation of the City Statutory Scheme, the SPA acted as planning consultant to the then City Commissioners. Here the Authority's central city planning policies, concepts and skills were able to achieve untrammelled expression. The style of FSR Code favoured by the Authority was introduced: easy-to-earn Bonuses of double the Basic FSR of 5, bringing total permitted FSR to 10, with a vague, discretionary proviso that this might be exceeded in "special locations and circumstances". Not surprisingly, hints that Development Applications would be treated "on their merits" encouraged developers to apply and argue strongly for more than the so-called "maximum". It was only several years later, in late 1971, that it became generally realised that the SPA's FSR Bonuses had proved too easy to earn, that the Plan and Code had given rise to development applications and proposals which could accommodate 80 to 120 thousand workers (a 33% to 50% increase in the entire existing Central Business District workforce), and that neither public nor automobile transport could cope with development of this magnitude.

22. The Plan for Woolloomooloo bore the name of the highest planning authority in the State. It was the first "detailed action plan" in what the general public hoped would be a new era for city planning in Sydney. It was exhibited for several weeks in the Town Hall and was accepted by the City Commissioners immediately prior to their retirement and the holding of elections in September, 1969, for a completely new City Council.

23. The foregoing paragraphs have summarised the planning situation in the City of Sydney as my colleagues and I found it when we took office as Aldermen late in 1969.

24. The new City Council, of which I was and still am privileged to be a Member, won office at the 1969 elections on a platform promising vigorous efforts in planning for the City. We undertook to support and prosecute positive planning. Our election platform included promises to carry out specific projects such as the Martin Place Pedestrian Plaza. Our first electoral victory gave us a popular mandate to make a fresh start in planning for the City after two decades of neglect.

25. On taking office, we determined to support and actively assist the SPA in the implementation of the Woolloomooloo Plan, because we felt that, as a matter of basic principle, we should support other Authorities in their planning efforts, and that public confidence, in the concept of positive and detailed planning for particular precincts, should be maintained by mutual support and cooperation between State and City Authorities. We felt that this was particularly important in the case of the SPA's Woolloomooloo Plan, as it was the first "detailed action plan" for a City Precinct.

26. While accepting and supporting the SPA's Woolloomooloo Plan, we also determined systematically to analyse and review all of the City's development and planning problems and opportunities in order to lay a firm and well-considered foundation of planning for future Aldermen to build on. We decided to launch an entirely new process of city planning in and for the City of Sydney.

We decided that this process should and would be, to the best of our ability and within the limits of our powers :-

- a) systematic, in that it would proceed from the general to the particular, from the definition of basic objectives, through the gaining of public support for a set of broad policies, followed by action to interpret and implement those policies year by year in practical and specific detail in accordance with realistic priorities. We decided that first, we would determine a flexible long range strategy, then tactics for a particular year, followed by action month by month;
- b) open, in that we would not only open our Committee Meetings to the press, but also seek to encourage the maximum possible citizen and interest group participation in every stage of the planning process, and to achieve the maximum possible exposure of planning problems, opportunities and controversies to the media, so that public opinion could play a more knowledgeable and effective role in both the shaping and the implementation of planning objectives than it had even been allowed to do in the past;

- c) co-operative, in that we would seek to maximise liaison and assistance to and from the Council and regional and State authorities, welcoming their guidelines, advice and assistance.
- d) responsibly independent, in that we would seek to regain for the Council the respect and support of the public and of other authorities, by gradually strengthening Council's own capacities and skills for effective City management, and so gradually re-assume responsibilities for City government which had, due to the neglect of previous Councils, been taken over by ad hoc bodies or State authorities;
- e) continuous, in that we would regularly review and as necessary revise and amend our objectives, policies and priorities in the light of the feedback of new information and the reaction of both public opinion and of other authorities.

27. As the first step in the launching of this process, we decided to prepare an overall strategy to guide and govern the management and planning of City development. We completed what we now refer to as the 1971 City of Sydney Strategic Plan within our first brief period in office, before we faced the electors again in September, 1971.

28. Our first step in initiating this planning process was to seek the advice and guidance of the Chairman, Deputy Chairman and Chief Planner of the State Planning Authority on a number of matters. We sought and did receive guidance and advice on the selection of a Planning Consultant, which we much appreciated.

29. We sought also from the SPA specific information and guidance as to whether, and if so what, research, statistical projections, objectives, policies and priorities regarding workforce, accessibility, public transport, parking and so on, had formed the basis, or the reasoning behind, the then draft City Statutory Planning Scheme, which was being handled by the SPA. In this, we were unsuccessful in obtaining satisfactory technical data and explanations. We also sought from the SPA information as to relationship of the Statutory Planning Scheme to the Sydney Region Outline Plan. We sought information as to the practical significance of the 1968 Sydney Region Outline Plan to future planning for the City of Sydney. In these efforts we were also unsuccessful in obtaining usefully precise technical information.

30. We were, however, asked by the SPA if we would urge the Minister to incorporate in the Statutory Planning Scheme for the City as a whole, a Floor Space Ratio formula recommended by the SPA, similar to the one used by the SPA in the Woolloomooloo Plan. The Authority's Chief Planner was invited to present, explain and support the request at a Special Meeting of the newly elected Council on Thursday, April 23, 1970. The "Notes" tabled and discussed at the Meeting contained only 5 paragraphs of 16 sentences which attempted to explain even broadly any reason for changes in then current policy. The Council could not feel confident that it could then come to any decision on any particular formula.

31. In efforts to obtain more information before advising the Minister of its views, Council called a special meeting in the AMP Theatre, at which the Presidents of BOMA and the RAI were invited to give their organisation's considered views on the SPA formula. Both organisations stated, in summary, that the then SPA proposals were altogether too simple to deal with the complex needs of different precincts of the City, and that, being so simply stated, the bonus provisions were ill-defined and even vague. They claimed that the SPA formula would force the provision of too many over-large, windswept plazas, and arcades which led nowhere. They advised that more complex, differentiated, and precise formulae should be prepared. The City Council particularly noted that the SPA formula took no account of the entirely different problems and opportunities with each of the different parts, or Precincts, of the large County Centre Zone. It did nothing to encourage a diversity of uses within areas that were fast becoming over-run with unrelieved office blocks, and from which theatres, cinemas, small shops, hotels, restaurants, professional chambers, churches and historic buildings were fast disappearing. Council agreed that Floor Space Ratio problems should be studied as part of the then proposed City Strategic Plan and advised the Minister of its views.

32. Meanwhile Council proceeded to select and appoint its Planning Consultant. Work on the City Strategic Plan began officially on August 10, 1970, without the Council or the Consultant being certain of what either the contents or the timing of the to-be-gazetted Statutory Scheme might be.

33. By letter dated August 31, 1970, the Minister advised the Council that "having regard to the Council's view that the control of Floor Space Ratio will form an integral part of the Strategic Plan for Sydney, now in course of preparation, and

on the assumption that there will be no delay in finalising this matter, I have decided to proceed immediately to prescribe the City of Sydney Planning Scheme, omitting from the Ordinance, Clause 45 dealing with floor area ratios and Clause 46 dealing with the control of the height of buildings within the County Centre, provisions for which could be incorporated in the City of Sydney Planning Scheme by way of a Varying Scheme upon completion of the Strategic Plan."

34. The foregoing is a brief summary of the Council's views of the origins and background of the present (1972) problems and needs for development control in the City of Sydney, and indicates the Council's approach to date in the taking of practical steps to resolve the problems and provide for the needs.

**THE PROCESSES OF STRATEGIC AND ACTION PLANNING,  
AND OF DEVELOPMENT CONTROL, INITIATED BY THE  
COUNCIL OF THE CITY OF SYDNEY**

**REPORT TO THE STATE PLANNING AUTHORITY BY  
ALDERMAN LEO PORT, BE, FIE AUST, M CONS E AUST,  
REPRESENTATIVE ON THE AUTHORITY OF THE COUNCIL  
OF THE CITY OF SYDNEY**

**ANNEXURE J  
ACCESSIBILITY AND TRANSPORTATION CONSIDERATIONS**

**NOVEMBER 17, 1972**



ACCESSIBILITY AND TRANSPORTATION CONSIDERATIONS

1. The second Objective of the City Strategic Plan is ACCESSIBILITY: "Improve access to, and movement within, the City". Improved transport of all forms, particularly public transport, is a basic City need. It was recognised that the problem runs well outside the City to the Sydney Region where the great bulk of its workers and visitors dwell. Consequently, during the preparation of the 1971 CSP, a close liaison was maintained with the following State Government Authorities and Committees concerned with transportation :-

Department of Railways  
Department of Main Roads (DMR)  
Department of Motor Transport  
Department of Government Transport  
Police Department (Traffic Branch)  
County of Cumberland Passenger Transport Advisory  
Committee (CUMTAC)  
City of Sydney Parking Advisory Committee (COSPAC)  
Traffic Advisory Committee (TAC)  
Sydney Area Transportation Study (SATS)  
The State Planning Authority (SPA)

In addition, consultations were held with the School of Traffic Engineering at the University of New South Wales and with Professor Alan Proudlove, Professor of Transportation Studies in the University of Liverpool, who was brought to Sydney especially for the purpose.

2. From the time the Strategic Plan was commissioned in August, 1970, until its completion in July, 1972, the City Council and its Consultants maintained a continuous flow of information to and from the SPA, CUMTAC, SATS, COSPAC and other State transportation authorities. During the preparation of the Plan, special meetings were held at periodic intervals with representatives of these Authorities and with Technical Sub-Committees and Working Parties formed by these and other Authorities or Committees associated with transport in the Sydney Region. At Council's invitation, representatives of the SPA and CUMTAC attended the regular Review Meetings held between the Council and its Consultants at the Sydney Town Hall throughout the period of preparation of the Strategic Plan.

3. All available data was requested from all potential governmental and private sources. Preliminary drafts of the Consultants reports were circulated in each case to the relevant Authority or Committee, for criticism and comment. Council's Consultants carried out a considerable amount of technical and economic analysis of the data collected. These analyses have been published at length in the Technical Annexures to the Strategic Plan, and in the Parking Policy and Control Code.

4. Notwithstanding these procedures on the part of Council and its Consultants, the amount of guidance provided by the SPA was less than had been sought and anticipated. The Authority, through its representative, was continually not in a position to make any comment concerning either possible or desirable future workforce distribution throughout the metropolitan area. The best that was promised, at the Review Meeting on February 18, 1971, was that the Authority might be able to identify areas in the western suburbs which might be able to accept tertiary activities. The Authority's representative was later similarly not in a position to offer any formal or even informal comment on drafts of the Floor Space Ratio Codes.

5. At that same Review Meeting on February 18, 1971, Dr Nielsen informed Council and its Consultants that SATS was  $2\frac{1}{2}$  years away from resolving matters of desirable future regional planning, and that the City Council should not wait for SATS but should press on with the City Strategic Plan, which would be regarded as an important and highly useful input to SATS. Dr Nielsen informed Council's Consultants that SATS had adopted CBD workforce projections of 380,000 to 530,000 for the purpose of testing dispersed and centralised regional employment alternatives by the year 2000. Council's Consultants felt that these projections were high, but acting on the basis of this information, the 1971 CSP warned that the strong planning measures it proposed should be adopted so as to provide for the contingency that, in 30 years time, the City might have to cope with a CBD-type workforce in the lower range of 360,000 to 400,000, preferably concentrated in the Central Spine, but possible scattered in ex-CBD Precincts such as Woolloomooloo and Surry Hills. It was only in January, 1972, six months after the publication of the Strategic Plan, that Dr Nielsen was able to inform our Consultants that his CBD workforce projections would be reduced to the range 260,000 to 374,000.

6. At no time has the City Strategic Plan attempted to deviate from the principles outlined in the Sydney Region Outline Plan. The CSP was indeed prepared so as to conform with the objectives and principles outlined in SROP, where these were, in fact, spelt out in sufficiently clear or precise terms to be meaningful. SROP set a number of general objectives in respect of the overall Sydney Region. Several of these were and are particularly relevant to strategic planning for the City :-

- \* "Sydney should remain Australia's greatest city, commercial centre and port;
- \* "Comprehensive replanning of the metropolitan city centre is needed;
- \* "A wider and more balanced distribution of commercial activity should be established so that over-concentration of employment in the metropolitan centre can be avoided;
- \* "A much greater level of investment in communications and public utilities is needed, coupled with the best use of existing facilities;

- \* "Flexibility is necessary;
- \* "Long-term growth must be allowed for."

It is submitted that these objectives were respected in the 1971 City Strategic Plan.

7. The SPA formulated seven basic principles underlying the Sydney Region Outline Plan. The following are relevant to strategic planning for the City :-

- \* "The principle of linear extension along communications corridors with high intensity activities, such as commercial and industrial centres and universities located on the rail system where possible;
- \* "The principle of a highway grid aimed at reducing the dominance of the radial pattern focussed on the metropolitan city centre and at increasing the accessibility of the Coastal Areas;
- \* "The principle of creating strong new commercial centres to secure a more balanced distribution of commercial activity and employment."

8. It is submitted that these principles were respected by the 1971 City Strategic Plan.

9. In summary, the 1971 City Strategic Plan established four major Objectives for the City - under the headings of MANAGEMENT, ACCESSIBILITY, DIVERSITY and ENVIRONMENT. Sixteen Policies and 83 Action Priorities were determined under the four Objectives.

10. The four Policies designed to achieve the Accessibility Objective are :-

"Policy 5 - Public Transport

Seek the modernization of public transport, in stages, to create an integrated system of greater capacity, convenience and comfort.

Policy 6 - Roads

Seek faster construction of roads bypassing the City: manage traffic inside the City to give priority to movement most vital to each Precinct.

Policy 7 - Parking

Expand the system of parking stations around, and regulate parking inside. Commercial Precincts to relieve traffic congestion.

### Policy 8 - Pedestrians

Create an integrated City wide pedestrian movement system, linking transport interchanges to each part of each Precinct."

Eighteen separate Action Priorities were listed as means of implementing these policies. It is submitted that these Policies and Action Priorities are consistent with the relevant objectives and principles of SROP, which are :-

- \* "A much greater level of investment in communications and public utilities is needed, coupled with the best use of existing facilities;
- \* "The principle of a highway grid aimed at reducing the dominance of the radial pattern focussed on the metropolitan city centre and at increasing the accessibility of the Coastal Areas."

11. The resulting plan for the City Centre is for a strongly rail-oriented linear Central Business District along the well-established north-south spine, with extensive pedestrianisation in the core and parking on the fringe. It was envisaged that this linear spine would extend from Circular Quay to Central Railway, and that possibly it would continue along the Railway to Redfern Station. This spine CBD is readily accessible to and from railway stations serving all rail lines radiating from the City. This plan is consistent with the State Planning Authority's SROP principle of "linear extension along communications corridors with high intensity activities, such as commercial and industrial centres, and universities, located on the rail system where possible". It was on this basis that Council's Consultants recommended against extensive office development to the east in the Woolloomooloo basin which is cut off from the CBD by the Domain, and which will have rail access from one line only.

12. The plan foreshadows a reduction in the CBD workforce as a proportion of the regional workforce from 21 percent in 1966 to about 15 percent in 2000. This represents a future dispersion of 100,000 to 150,000 employees which must be accommodated at other centres in addition to the natural growth that will occur at these centres. The plan could err on the high side but local contingency planning for a possible workforce level which might not be realised is less disastrous than planning for one which is exceeded by a significant amount. We did not wish to repeat the type of mistake made by the 1948 County of Cumberland Scheme, one of the major deficiencies of which was a grossly under-estimated future population projection.

13. Comparison of the workforce estimates for the CBD given by the 1971 CSP (360,000), those for a Centralised workforce (374,000) now being planned for by SATS and a Dispersed workforce

(380,000) previously planned by SATS, show a remarkable similarity. If SATS finally in 1974 emerges with a firm recommendation suggesting a significantly lower ultimate CBD workforce than was estimated as possible by the 1971 CSP, two significant factors will need to be considered. These are :-

- a) Where the balance of the regional workforce will be accommodated;
- b) How metropolitan transport will be arranged to encourage a mass movement of the regional workforce to major centres other than the CBD.

14. If the SPA plans to accommodate all of the future growth of CBD-type employment in a limited number of large new commercial centres, it is quite likely that the largest of these would rival the Sydney CBD in size and create its own very substantial infrastructure problems.

15. In a Minute accompanying Chief Planner's Report No. 9/72, the Chairman acknowledges that a workforce in the Sydney Region "of the order of two million by the end of the century" will "need major transport facilities" and goes on to say "It is expected that the transportation pattern will be designed to augment the general principles set out in the Sydney Region Outline Plan except where investigations indicate modification may be needed on transportation grounds. However, on present indication it seems that the general principles set out in the Sydney Region Outline Plan scheme will be valid". This latter statement appears to indicate a lack of appreciation of the transportation planning process. SATS has so far not progressed anywhere near the stage where anyone could give any indication as to whether the principles set out in the 1968 Sydney Region Outline Plan will be valid or otherwise. It is doubtful whether anyone could comment on this with any degree of certainty before mid-1973. The general guidelines given by the Authority to SATS will themselves tend to ensure that SATS will not invalidate the 1968 SROP.

16. It is understood that no alternative land use patterns are being studied by SATS apart from the two levels of workforce within the Sydney CBD, related to "Centralised" and "Dispersed" Metropolitan Employment Patterns. It would be of interest to know the estimated employment location of the 114,000 workers representing the difference in CBD workforce for these two patterns. Are they going to be dispersed relatively uniformly, or will they be dispersed to several other centres; and, superimposed on the employment already planned for these centres, create their own massive transport infrastructure problems.

17. It is of interest to examine the 1968 SROP in more detail to determine just what guidance it does give concerning the problems of accommodating a greatly increased future regional workforce and a possible distribution of this additional workforce. The SPA has assumed for planning purposes that the regional workforce is likely to increase by 350,000 in manufacturing, and by 950,000 in "metropolitan and local services" (defined in the Prelude to a Plan as tertiary services). On a percentage basis, the estimated increase in tertiary services is by far the greater, being about 140 percent compared with above 80 percent in manufacturing.

18. In SROP, the SPA indicates in some detail its approach to the problem of accommodating an additional 350,000 manufacturing employees in addition to those which may be relocated from the inner areas to the outer areas of the Sydney Region. Examination of the specific outline plans for each sector indicates that contingency plans have been made for up to 290,000 workers within four new or expanded sectors, with the balance probably being able to be absorbed into the other three new sectors. This appears to be fairly reasonable. Unfortunately, the contingency planning in the SROP for accommodating the anticipated 950,000 increase in tertiary workers is considerably less complete. However, other subsequent studies and analysis give some indication as to how these people may be accommodated.

19. As the classification "tertiary workers" includes a considerable proportion of people not indigenous to either offices or to the CBD or major regional centres, a more appropriate classification appears to be "office workers". Analysis of the proportion of workers in different employment categories in the 1966 Census indicates that office workers account for about 45 percent of the tertiary workforce. Consequently, if this proportion remains constant in future years, the need to provide for an increase of 950,000 tertiary workers implies a need to provide for an increase of about 450,000 office workers over the period to the year 2000. This is an increase from about 350,000 in 1966 to about 800,000 in 2000. The estimated CBD office workforce in 1966 was about 140,000 persons.

20. A study made by Council's Consultants indicates that the number of office workers in the Sydney Metropolitan Area was about 350,000 in 1966 with approximately 50 percent in the CBD and North Sydney, 25 percent in smaller centres and 25 percent in industrial areas. If this ratio between major office centres, small centres and industrial areas holds, there will be a need to provide office accommodation for about 400,000 employees in major centres in the year 2000.

21. As many office functions need to be confined to major centres, there is no reason to believe that these ratios will change. If anything, the proportion associated with industrial areas could drop slightly because of the relatively lower projected growth of workforce in manufacturing compared with tertiary workers. Consideration of the SPA proposals for Parramatta and the totals projected for the North Sydney - Chatswood corridor by their relevant planning consultants indicates that these centres could account for about 120,000 office workers, leaving up to 280,000 for the Sydney CBD, a further 200,000 in smaller centres, and 200,000 in industrial areas. Conversely, if one assumes zero overall growth for the CBD another solution is to spread the shortfall of over 100,000 office workers in Parramatta and North Sydney - Chatswood. This would result in total workforces of the order of 150,000 to 200,000 in each of these areas.

22. If the growth of such centres is to be accelerated, very extensive capital works, to provide adequate public transport for these centres, will need to be provided as soon as possible to act as a catalyst. However, if the Eastern Suburbs Railway is any guide, such major capital works are likely to take many years to plan, design, acquire land for, and construct. Whether the cost of such works would be more or less than those required to augment the existing extensive rail system now serving the CBD will require extensive further investigation.

23. In this context there is one inescapable fact. This is, the existing extensive suburban electric rail system is already focussed on the CBD and is basically a good one. Therefore, it is surely logical to try to improve the capacity and operating efficiency of this existing system by improved signalling, scheduling of trains, more efficient design of railway carriages for rapid loading and unloading of passengers, improved platform capacity at existing railway stations within the CBD.

24. Such improvements to the operating efficiency of the transport system now serving the Sydney CBD may well be achieved for a relatively much lower cost in the short to medium term and thus allow the necessary time for construction of major capital works to serve new centres. It is hoped that SATS will investigate and report on these investment scheduling matters. Obviously some capital works to improve weak links within the existing system will be necessary in the short to medium term. The 1971 City Strategic Plan pointed out one, i. e. , the link between East Hills and Glenfield or Casula.

25. It would appear that, given the existing public transport system, Parramatta is no better equipped to handle an increase from the present 20,000 (or thereabouts) to 150,000 - 200,000

than Sydney is to handle an increase from 240,000 to 360,000 to 400,000. Consideration of the SPA proposals for other selected centres named in the Sydney Region Outline Plan indicates a planned office workforce aggregating about 20,000 in the three centres of Mt. Druitt, Blacktown and Penrith in the Western Sector as defined in SROP. The SPA has also nominated Campbelltown and a new centre serving the Rouse Hill-Maralya area as other major or substantial new metropolitan sub-centres. Independent investigations point to possible aggregate office workforce of up to 50,000 for these two centres. The balance of 120,000 to 140,000 would be spread over numerous suburban centres throughout the Sydney Region. Care will be needed in selecting these centres to ensure that they do not conflict with proposals for major car parks at suburban railway stations for rail commuters to Sydney, North Sydney and Parramatta. This is discussed in more detail subsequently in this Technical Annexure.

26. Another factor worthy of consideration is the likely future effect of staggered work hours which must inevitably accompany a progressively shortening working week. Within the CBD, the average working week for office workers is generally in the range 30 to 40 hours per week spread over five days between the hours of 8.15 am and 5.30 pm. The net result is a sharp peak, particularly on public transport, between 8.15 am and 9.00 am, and 4.45 pm and 5.30 pm. Reduction of the average working week to the range 30 to 35 hours per week without reducing the number of days worked would enable significant staggering of hours within the range 8.15 a.m. to 5.30 pm and hence a spreading of the commuter peak periods from the current 30 to 45 minutes to a possible 60 to 90 minutes within these hours.

27. Reduction of the days in the working week for a proportion of the office workforce from the current five days to three, three and a half or four days, or a mixture of these three alternatives could stretch the peak hour by a further 30 to 60 minutes. This would have the same effect as existed within the CBD ten to twenty years ago when there was a longer and flatter commuter peak due to the presence of both white and blue collar workers. It is likely that the lengthening of the peaks through staggered hours in the manner described above could reduce the intensity of peak hour demand by up to 50 percent.

28. Such reductions could have very major implications for public transport, private transport and car parking within the CBD. For example, it is possible that the relationship between road capacity and accumulation of parking spaces within the CBD would change from the current ratio of approximately 1:2 to a ratio of the order of 1:3. Hence additional parking capacity could be made available within and adjacent to the CBD in future years to match the capacity of the road system with a longer and flatter peak. It is understood that SATS is studying the effect



of staggering work hours and that "the study of data available on peak period traffic to encourage a move to a wider spreading of city office hours" is one of the priorities announced in the first report of the newly appointed Public Transport Commission. It is hoped that liaison concerning this will be maintained between the PTC, SATS and the Council and its Consultants during the 1973-74 review and revision of the 1971 City Strategic Plan.

29. Whereas the above discussion presents a reasonable picture of how the future metropolitan office workforce may disperse and of the number of office workers that might be located in the Sydney CBD, the position regarding the balance of the tertiary workforce is not so clear. This represents an increase of about 500,000 workers to over 1 million over the period 1966 to 2000. The 1966 estimate of the CBD workforce indicated a probable 140,000 office workers and a smaller number of other workers divided approximately equally between retail, warehousing, industry and miscellaneous activities.

30. Consideration of data currently available and also of the need to improve the diversity of the city and in particular the CBD, indicates that while the number of people engaged in warehousing and industry is likely to drop, the drop could be balanced to some extent by some increase in personal and other non-office services. The net result is likely to be a slightly reduced non-office population. In this regard the SPA objective that "Sydney should remain Australia's greatest city, commercial centre and port" and the Strategic Plan Policies: Policy 9 - "Arrest and reverse the decline in the City's resident population"; Policy 10 - "Maintain and revitalise retailing and entertainment, tourist and convention facilities within the City"; Policy 11 - "Work to improve the range of community services and facilities throughout the City"; Policy 12 - "Seek a cultural and educational activity throughout the City", should be considered.

31. Achievement of these policies could well see an increase or at least an arrest in decline of the non-office oriented workforce. Perhaps the continuing decline in such job opportunities had been a result of the non-pursuit of these Policies over the last decade or more. In any case many such employees would be working outside normal business hours and would not overtax the transport system during peak hours. On the contrary, it could provide beneficial side effects during off-peak hours.

32. The foregoing does not attempt to solve the problem of accommodating the projected regional increase of 950,000 tertiary workers including about 450,000 office workers over the next 30 years. But, it does attempt to quantify the problem in a manner that does not seem to have been done by the SPA in their

attempts to date to plan for an increase of 950,000 tertiary workers within the Sydney Region.

33. In conclusion, it appears that, although the workforce in the CBD may not reach the contingency levels postulated as possible in the year 2000 by the 1971 City Strategic Plan, there is not sufficient evidence to indicate that restrictive planning measures need be adopted at this stage to ensure that it does not. In view of the apparent increase of up to 2% per annum in the overage floor space per office worker in City office buildings, existing average Floor Space Ratios could in future accommodate substantially less workers than they do today. The 1971 CSP assumed that each office worker occupied an average of 163.4 sq. feet of Floor Space. Current North American standards are in the order of 250 sq. feet per worker. The matter is best left open at this stage and the recommendations of the 1971 CSP retained, at least for the time being, pending the review and revision of the 1971 CSP by Council during 1973-74. In the meantime, it is likely that significant new data will have been compiled by SATS, the SPA and other organizations concerning regional and CBD workforce patterns.

34. Notwithstanding the validity of the City Council's reasons for planning for the contingency of an ultimate CBD workforce of the order of 360,000, it is beyond Council's powers to organise transportation to suit this plan. It can only make representations to the relevant State Government Authorities concerning matters relating to transportation except in the field of parking and local street planning. Consequently, it has been towards the problem of parking that much of Council's and its Consultants efforts were directed.

35. The two prime requirements of a balanced road and parking system to serve the City of Sydney, or for that matter any other city, are a road system that allows through traffic to by-pass the CBD; and a parking system with a capacity properly related to the peak-hour capacity of the road system bringing traffic into the CBD. It was recognised that Sydney did not have the former and, if provision of extensive off-street parking throughout the CBD continued in line with the provision of the pre-1971 Parking Code, it would not have the latter.

36. While it is recognised that numerous bodies, including the SPA, HOBAC and COSPAC, have been concerned for some years about the increasing amount of off-street parking being provided in the CBD, it was evident that none of these bodies had ever effectively tackled the problem and produced any definitive policy that would lead to solving it. This is notwithstanding the occasional SPA/HOBAC refusal of a Development Application involving major off-street parking facilities accommodating several hundred cars.

37. What was required was a Policy and a Code to restrict not only major facilities with a capacity of several hundred car spaces, but also, the accumulated effect of numerous small off-street car parks with an aggregate capacity of several thousand car spaces. At no time prior to the formulation of the City Council's 1971 Parking Policy and Control Code had anyone come to grips with this particular problem.

38. In the Tank Stream and Mid Town Hub Precincts, HOBAC in 1970-71 allowed without question ten Development Applications on relatively small sites aggregating 220 car spaces, with individual site densities ranging between 52 and 380 car spaces per site acre. Application of the Parking Control Code would have taken a far more conservative approach and restricted this to 90 car spaces. Further evidence in Annexure H to Alderman Leo Port's Report dated 17.11.72 to the SPA shows that, when applied to 25 recent office building Development Applications, the 1971 Code has reduced on-site parking from 2,146 cars permitted under the old Code to 828, a reduction of over 60 percent.

39. Therefore, it is submitted that the City Council's 1971 Parking Policy and Control Code is far in advance of anything that has yet been produced either in Sydney, or as far as is known, in other Australian and overseas cities, that it warrants being retained without alterations subject only to review by Council in the light of the results of the Sydney Area Transportation Study, and the review and revision of the 1971 City of Sydney Strategic Plan in 1974. Retention until 1974 was endorsed by CUMTAC, (which includes the Chairman of the SPA) in its letter, dated 15 February, 1971, to Council stating :-

"I wish to inform you that the Committee regards the Report as providing an acceptable interim policy to be reviewed in the light of any recommendations flowing from the Transportation Study for the Sydney Region now being undertaken by the Government under the Directorship of Dr R. S. Nielsen."

40. In view of the mistaken statements contained in the SPA Chief Planner's Reports 9/72, 40/72 and 51/72, which cast reflections on the technical and professional competence and integrity of Council's Consultants, it is necessary to detail some of the more important factors considered in the preparation of Policy 7 (Parking) and the five associated Action Priorities of the 1971 City Strategic Plan, the 1971 Parking Policy and Control Code, and Action Plan No. 4 on Car Parking Stations on the Western Perimeter of the Central Business District. These are all closely interrelated and indeed interlocked.

41. The most important factors are the capacity of the road system serving the CBD and the nature of the traffic using it. Capacity can be defined in terms of the capacity of an intersection, or in terms of the mid-block capacity of the road between intersections. In almost all cases in an urban situation, intersection capacity is the governing factor. Capacity is a complex concept and varies with the "level of service" sought.

42. The term "Level of Service", broadly interpreted, denotes any one of an infinite number of differing combinations of operating conditions that may occur on a given roadway when it is accommodating various traffic volumes. Level of Service is a qualitative measure of the effect of a number of factors, which include speed and travel time, traffic interruptions, freedom to manoeuvre, safety, driving comfort and convenience, and operating costs. In practice, there are six specific Levels, A to F, defined in terms of particular limiting values of certain of these factors. For intersections these levels of service are summarised as follows :-

At Level of Service A, no approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically the approach appears quite open, turning movements are easily made, and nearly all drivers find freedom of operation, their only concern being the chance that the light will be red, or turn red, when they approach.

Level of Service B represents stable operation in which an occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel somewhat restricted within platoons of vehicles.

In Level of Service C, stable operation continues. Loading of an approach phase is still intermittent, but more frequent. Occasional drivers may have to wait through more than one red signal indication, and back-ups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.

Level of Service D encompasses a zone of increasing restriction approaching instability. Delays to approaching vehicles may be substantial during short peaks within the peak period, but enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive back-ups.

Capacity occurs at Level of Service E. It represents the most vehicles that any particular intersection approach can accommodate. At capacity there may be long queues of vehicles waiting upstream of the intersection and delays may be great (up to several signal cycles).

Level of Service F represents jammed conditions. Back-ups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration; hence, volumes carried are not predictable. No load factor can be established, because full utilization of the approach is prevented by outside conditions.

43. Selection of appropriate Levels of Service within the range A to D is somewhat subjective and governed to a large extent by availability of funds. Level A is seldom used in practice and Level B is usually suitable for rural design purposes. Levels C and D are generally used for urban planning purposes, with the latter being acceptable within inner metropolitan areas and associated with overall travel speeds in the range 10 to 15 miles per hour. These standards are used by the Commonwealth Bureau of Roads as tolerable peak hour standards for inner urban areas in major Australian cities and were selected as a basis for determining appropriate Levels of Service and hence capacity of the cordons around the CBD.

44. The City Council's Consultants analysed the Department of Main Roads 1965 and 1968 Traffic Surveys, together with data from the Departments of Motor Transport and Government Transport. This yielded an estimate of the amount of through traffic passing through the streets of the CBD, the amount of through traffic likely to be diverted following completion of several major transportation projects now under construction, and the capacity of the street system consistent with Levels of Service C and D, as measured at the cordon lines shown on maps published in the Parking Policy and Control Code.

45. Following the completely incorrect claims in the Chief Planner's Report 9/72 of 17 January, 1972, inferring that the Consultants had not done their homework properly, Council's Consultants carried out a further detailed field survey at all intersections on both the inner and outer cordons as defined in the Parking Policy and Control Code, in order to determine their individual capacities. Cognisance was taken of the capacities of adjacent intersections where they were thought to create a greater capacity restraint than the intersection closest to the cordon. The survey and analysis was carried out for inbound traffic in the morning peak as this is generally the heavier of the two peaks.

46. Factors considered at each intersection included approach road widths, lane widths, gradients, location of bus stops, presence of parked vehicles, special turning lanes, intensity of pedestrian flow, traffic signal cycle and phase times, proportion of turning vehicles and proportion of heavy vehicles in the traffic stream. In each case the capacity was taken as the lesser of either the roadway or intersection capacity for the relevant approach road. In almost all cases the intersection capacity was the governing factor.

47. As discussed previously, Levels of Service in the range C to D were considered appropriate. In the case of the street system serving the CBD a capacity consistent with a Level of Service midway between C and D was nominated as being suitable for the outer cordon. For the inner cordon Level of Service C was selected as being appropriate because of the short block lengths across the CBD and the relatively greater congestion that might arise due to backed up queues of vehicles. The capacities for these outer and inner cordons were found to be 21,000 and 18,500 vehicles per hour in one direction for the stated Levels of Service.

48. Measurement of the traffic volumes at each of the intersections on the cordons indicated some variation in the Levels of Service encountered. On the outer cordon there are 13 major road approaches and five minor road approaches. Each of the five minor approaches were found to be operating well within their capacity at Level of Service A. This is indicative of the probability that much of the traffic using these approaches was locally generated. However, it is bad planning to expect these approaches to carry any non-local traffic. Consequently their capacities were not included in the cordon capacity. Currently eight of the major approaches are operating at Levels of Service B and C and five at Levels of Service D and E. This situation is expected to change following completion of major rail and road projects now under construction. The opening of the Eastern Suburbs Railway in 1974 will remove many buses from City streets, and will increase street capacities.

49. There are 18 major streets and seven minor streets crossing the inner cordon. Again the capacity of the minor streets was ignored and a cordon capacity of 18,500 vehicles per hour determined for Level of Service C. The current situation is that 15 streets are operating at Level of Service C or better and three at Level of Service D or E.

50. Having established the road cordon capacity, it was necessary to relate this to the appropriate accumulation of parking spaces within the CBD to match this capacity. Investigations of peak traffic flow patterns, parking accumulation patterns and studies conducted overseas, reported at the International Study Week on Traffic Engineering in September, 1970, indicated that the maximum number of parking spaces allowable is about twice the maximum traffic flow into the area. As the inner cordon is currently operating at about capacity at an average Level of Service C, the maximum number of spaces allowable within the CBD (Tank Stream, Midtown Hub, Brickfield Hill and Rocks Precincts), was fixed at twice the peak hour inflow into the CBD. This was

estimated to be 18,500 vehicles per hour, comprising about 6,000 vehicles per hour through traffic passing through the CBD and 12,500 vehicles per hour into the CBD.

51. The maximum number of spaces allowable within the CBD under current conditions was therefore set at about 25,000. This can be increased only by increasing the street capacity across the inner cordon (difficult to achieve without substantial widening and costly property resumption), or by diverting some of the through traffic around the CBD. It is estimated that up to one third of this through traffic can be diverted following construction of Stage 1 of the Western Distributor and other roadworks.

52. If, for example, 1,500 vehicles per hour were diverted to the Western Distributor, the through traffic would be reduced to 4,500 vehicles per hour leaving capacity for 14,000 vehicles per hour into the CBD. This would allow an increase of about 3,000 spaces over the 25,000 spaces proposed as the maximum allowable within the CBD. But a conservative approach was taken and this somewhat marginal increase was not incorporated into the calculations and the future levels of parking within the CBD constrained to a limit of 25,000 spaces.

53. To form a measure of required space allocation and price levels for appropriate parking policy, it is necessary to establish estimates of present and future supply and demand for parking.

54. The SPA has repeatedly talked about the concept of allowing for only "essential" parking. SPA representatives first raised this matter in early 1971 and apart from talking and writing in broad terms of the vague concept of "essential" parking have not made any attempt to define it, although they have had ample opportunity to do so during the continuous liaison maintained between the Council, its Consultants and representatives of CUMTAC during 1971. In addition, no-one else has yet determined just what is "essential" parking. It's all very well for armchair critics to talk glibly of "essential" traffic or "essential" parking, but they have never attempted to define precisely how such a loose concept could be applied in practice. With the present level of parking fees within the CBD, there is a prima facie case for assuming that most, if not all, the vehicles parked within the CBD are "essential" vehicles and that at present the only "non-essential" traffic is through traffic which does not stop there.

55. If one accepts that the concept of "essential" parking is in fact highly subjective, some useful but subjective conclusions may be derived from consideration of the objectives of both the SPA and the CCS concerning the future of the City of Sydney. Acceptance of the SPA's objective of maintaining Sydney as "Australia's greatest city, commercial centre and port" must certainly imply the desire not to drive business out of the city to interstate and overseas cities. If Sydney is to increasingly concentrate the most highly specialised decision-making functions of a regional south-west Pacific headquarters, a realistic approach to providing a reasonable number of car spaces within or immediately adjacent to the CBD is required for executive parking both for some commuter and some short-term visitors.

56. Studies carried out subsequent to the preparation of the Strategic Plan and its associated Policies included an "attitude" survey of the average level of parking necessary to retain businesses within the CBD. This was found to average about one space per 2,000 square feet of Total Floor Area required for commuter purposes; this space being either on-site within the CBD or on the perimeter of the CBD. By contrast, the City Council's 1971 Parking Code specifies one space per 2,500 square feet to be provided either on-site, where permitted, or in the form of contributions to Funds for the provision of perimeter parking.

57. The lower level of one space per 2,500 square feet is considered to be a suitable compromise, reflecting the difference between what property tenants SAY they will do and what they actually DO concerning location of their offices.

58. Looking to other cities, it is worthy of note that the current estimated inventory of parking spaces serving the Melbourne CBD totals 33,500, compared with the 29,800 spaces estimated to be available to serve the Sydney CBD. It is also worth noting that the proportion of peak hour commuters now travelling all the way into the CBD in their own vehicles (13 percent of the total) here in Sydney is already lower than in almost any other major city in the industrialised nations of the Western World. Only in London and New York more than 4 or 5 times bigger than Sydney is this proportion slightly lower. In other cities with extensive rail networks, for example, Chicago, Philadelphia, Boston and Toronto, it is significantly higher, being in the range 19 to 31 percent. In cities currently without commuter rail networks, for example, Los Angeles, Detroit, St. Louis, Washington and Baltimore, and for which rail services are now being implemented or planned, the proportion is much higher again, being generally in the range 48 to 66 percent.



59. In the absence of any realistic guidelines concerning "essential" parking being provided by the SPA or any other body, Council and its Consultants during 1970-71, prepared estimates of demand in the light of three basic assumptions. There were:-

- a) that the present demand for parking is met by the present supply of off-street and kerbside spaces. Implicit in this is the assumption that there is no backlog of demand. Clearly this is not the case - almost certainly more people would like to bring their cars into the City than now do so. The rising prices charged for City parking indicates this. But no practical method is available for measuring this backlog and the assumption was made for practical convenience as a working approximation.
- b) that the proportion of commuters travelling to the City in their own vehicles will remain at the 1966 level as a first approximation, and the number of visitors will grow with the volume of commuters at the 1966 proportion. Clearly, both these proportions could change, either as a result of changing circumstances or of acts of policy. However, sufficient light for current purposes is thrown on the dimensions of the parking supply and demand problem by restricting this discussion to estimates based on the 1966 modal split. Further comments on modal split are made elsewhere herein.
- c) that the work force in the CBD might grow linearly to 360,000 in the period to 2000 AD. Notwithstanding the doubt that has subsequently been placed on this possibility, by for example, severe cutbacks in workforces planned for the Rocks and Woolloomooloo, it is highly likely that a reduced workforce would be a result of fewer commuters from the outer western and south-western areas from where the proportion travelling to the CBD by car would be low. This is discussed in more detail elsewhere herein.

60. As a result of these assumptions estimates of Parking Supply and Demand for the CBD were formulated. These have been presented in tabular form in the 1971 City Strategic Plan book (Annexure E), the 1971 Parking Policy and Control Code for New Development (Pages 7 to 13 and Appendices to the Parking Policy), and Action Plan No. 4 (Pages 12 to 19).

PROVISION FOR SHORT-TERM PARKING AND REGULATION OF  
OPERATING CONDITIONS OF CAR PARKING STATIONS.

61. If Sydney is to remain a viable major business centre, the short-term visitor parker must be more adequately provided for in future years than in the past. This was recognised during the preparation of the 1971 Parking Policy and Control Code, which indicated a need for a limited number of spaces to be provided specifically for the use of short-term visitors in parking stations within the Mid-Town Hub and Brickfield Hill Precincts. Totals of 500 and 1,000 spaces were proposed for the years 1975 and 1980 respectively. Action Plan No. 4 proposed that the initial target be met by providing 500 spaces to serve the Mid-Town Hub Precinct and that a further 500 spaces be provided subsequently following evaluation of the actual demand for spaces and the distribution of spaces in 1975. It was recommended that the initial target of 500 cars be met by providing for short-term visitor parking in the first priority major Western Perimeter parking station planned to be located in the block between King, Market, Kent and Sussex Streets.

62. Subsequent investigations following completion of Action Plan No. 4 have led to the conclusion that the recommended levels of special short-term visitor parking may be inadequate for the CBD as a whole. They are probably adequate to serve the City's retail activities but not business and commercial activities.

63. One of the penalties of continued dispersion of tertiary, particularly office, activities throughout the metropolitan area will be the need for increased visitor parking. The only way by which this need for an increase in visitor car parking requirements can be obviated is a considerable upgrading of the level of service now offered by taxis and the provision of high speed, high frequency public transport during business hours throughout the day on the routes linking the principal dispersed centres. For example, the level of service currently offered by public transport between the CBD and North Sydney during the day is not particularly good; with rail services limited to a 15 minute frequency and buses going only as far as Wynyard. These types of problems will be aggravated by dispersion to centres such as Parramatta and Campbelltown which are significantly more remote from the CBD than is North Sydney. But the problem didn't exist before commercial activities commenced to disperse from the CBD. Contact could then be made by either walking or by short-haul public transport within the CBD.

64. Providing accommodation for this demand can be best achieved by regulating the hours of operation, or the pricing structure, or both, of certain car parking stations within or immediately adjacent to the CBD. At present, through the licensing system, Council has power to establish operating

of Sydney and the Sydney Region was completed by the year 2000. At this point in time, there is no guarantee that either of these will happen. But in 1970-71, there was no official indication that they would not be eventually constructed.

69. By contrast, Action Plan No. 4 - Car Parking Stations on the Western Perimeter of the Central Business District was prepared on the basis that, in the short to medium term covering the period to 1980, two major road projects approved by the Government and scheduled by the Department of Main Roads for completion within the next decade will, in fact, be completed generally according to programme. These are the first stages of the Western Distributor and the North Western Expressway. The first is now approaching completion. The second, between Kent Street and Pyrmont Bridge Road, has been specifically approved by the Government for early construction.

70. Consequently this Action Plan is not directed towards actually providing upwards of 14,000 spaces on the Western Perimeter by the year 2000, but is directed towards providing an additional 6000 spaces in this area by the 1980. This will bring the parking accommodation within and adjacent to the CBD into line with the increased road capacity that will result from completion of Stage 1 of the Western Distributor and Stage 1 of the North-Western Expressway.

71. Any further increases in car parking accommodation will be entirely dependent on further increases in road capacity brought about by completion of subsequent stages of the Western Distributor and the Western and Southern Expressways. This point appears to have been completely misunderstood by both CUMTAC and the SPA.

#### EFFECT OF THE 1971 PARKING CONTROL CODE

72. The Parking Code was designed to achieve five basic objectives. These are:-

To restrict parking within the CBD and certain adjacent areas where the capacity of the feeder and internal road system was limited;

To provide for the gradual elimination of all kerbside parking for both passenger and goods vehicles within the CBD during business hours.

To provide adequate off-street parking facilities for all vehicles associated with adjacent land use activities in the rest of the City of Sydney;

conditions for parking stations, but this has not yet generally been done and there may be some legal question of the extent of the powers.

65. The Local Government Act, Section 270 L, gives Council the power to 'control and regulate parking stations', which appears quite inclusive, but the power to set prices is not specifically mentioned. Full use of these powers could be a very effective tool in the control and the relief of congestion. If parking conditions and charges are regulated - for example, by increasing the number of off-street, short-term parking spaces available in or on the perimeter of the retail precincts, or by increasing charges during peak hours for access to off-street parking facilities in the most congested areas of the City - it would be possible to encourage the use of the roads during off-peak hours and to make perimeter parking stations operating at lower rates more attractive.

66. This was foreseen during the preparation of the City Council's 1971 Parking Policy and Control Code which, in addition to indicating a need for spaces specifically for the use of short-term visitors, made a specific recommendation that "Existing powers of licensing be exercised to regulate the conditions of operation of commercial parking stations to relieve congestion, and Council's power to regulate charges should be put beyond doubt." Council Aldermen, Council's Consultants and representatives of the City of Sydney Parking Advisory Committee, its Technical Sub-Committee and the Heights of Buildings Advisory Committee are currently seeking practical methods of implementing this.

67. However, the application of regulatory powers should be on the basis of detailed surveys of commuter and visitor parking patterns and demand. None of these has yet been done in the City of Sydney but it is planned to carry these out on a sample basis during the 1973 - 74 Revision of the City of Sydney Strategic Plan.

#### PARKING POLICY SUMMARY

68. In accordance with the 1971 City Strategic Plan, the 1971 Parking Policy indicated possible 1990 and 2000 contingencies to illustrate the nature and potential magnitude of the problem. It was not meant to plan the number and distribution of parking spaces in and around the city for the year 2000. On the contrary, it was designed to set down criteria to govern the number and location of parking spaces that would be required and could be serviced by road access, if the CBD grew to the extent that 1971 SATS and CSP estimates envisaged it could, and if the expressway system then planned and confirmed by statutory schemes to serve the City

To provide for off-street loading and unloading of all delivery and service vehicles in all new buildings;

To regulate access between off-street parking facilities and the street system in such a way as to minimize interference to moving traffic on the adjacent streets.

73. In formulating these objectives it was assumed that future densities of development in the CBD and some adjacent areas would be sufficiently high to warrant restrictive measures concerning parking and that access to public transport would be adequate to serve the balance of commuters for which car parking would not be available. It was also assumed that future densities of development in the rest of the City of Sydney would be sufficiently low to permit on-site off-street parking for all vehicles associated with adjacent land use activities without prejudicing the capacity of the road system. I shall now proceed to summarise the likely effects of the Parking Control Code in each of the Districts X, Y, Z, and P as defined in that document.

74. District X contains the four Precincts that comprise the spinal core of the CBD. These are the Tank Stream, Mid Town Hub, Brickfield Hill and Rocks Precincts (less that section being redeveloped by the Sydney Cove Redevelopment Authority).

75. The Code provides minimum standards for off-street parking associated with residential activities (both permanent and transient). This is necessary to keep these vehicles off the streets. But it is not expected that many of these vehicles will be entering or leaving these facilities during the commuter peak hours. In any case application of these standards to major hotels would not yield parking densities exceeding 150 parking spaces per acre of site area. For example, application of this code to the Wentworth and Sydney Hilton Hotels would have yielded densities of 108 and 100 spaces per site acre respectively. In any case major international Hotels are not likely to proliferate following completion of the projects now under construction. If anything, future projects of this nature may need considerable financial assistance before they ever proceed past the drawing boards.

76. Concerning all other uses except residential the Code is very restrictive indeed. Within the Tank Stream Precinct the Code generally allows 50 spaces per site acre (about one space per 9,000 sq. ft. of gross floor area for a Floor Space Ratio of 10 to 1), with increases on the western side of the Precinct where access is available to York, Clarence and Kent Streets (which will be relieved of a considerable amount of through traffic following completion of Stage 1 of the Western Distributor). But the Code completely restricts access within 100 feet, and in some cases 200 feet, of any

intersection. In certain cases, for example in parts of Hunter and Bent Streets, where block lengths are less than 200 feet it represents a denial of access over the whole block. No access is allowed to Martin Place and access is not allowed in Bridge Street except where access into buildings is specially designed to eliminate queuing back into the street and to minimize any other potential obstacle to vehicular or pedestrian traffic. Access has been restricted in the Circular Quay area in conformity with the State Planning Authority's proposals for that area.

77. The net result of these access restrictions is a probable lower accumulation of parked vehicles within the Precinct than allowed by the limit of 50 vehicles per site acre unless considerable site amalgamation occurs.

78. A similar situation occurs within the Midtown Hub Precinct where a maximum of 50 spaces per site acre is allowed subject to access requirements in the vicinity of intersections and on Park Street being satisfied. In addition no access is allowed to Castlereagh or Pitt Streets. These restrictions should lead to the same result as in the Tank Stream Precinct.

79. Due to better access to and slightly less congestion within the Brickfield Hill Precinct the basic upper limit was raised to 100 spaces per site acre, but again subject to access requirements in the vicinity of intersections and on Park, Goulburn and Campbell Streets being satisfied. These restrictions should lead to the same result as in the Tank Stream and Midtown Hub Precincts.

80. In summary, it appears that the SPA has not taken the time to look sufficiently into the implications of the Code to gain a proper appreciation of the overall effect of the basic limits together with the access restrictions likely to have an effect on parking within District X. The overall effect of the Code is such that it is extremely doubtful that there will be any spaces available within buildings in District X for renting off as part of a public parking station. Within the Tank Stream and Mid Town Hub Precincts in particular it is very doubtful whether the Code will allow on-site parking for even all of the major tenants. Extensive use of perimeter parking by other tenants is envisaged.

81. District Y contains eight Precincts on the eastern and southern perimeter of the CBD. These are the Railway, Brewery, Oxford Street, William Street, Stanley Street, Woolloomooloo, Kings Cross and West Surry Hills Precincts.

82. The Code provides minimum standards for off-street parking associated with residential activities and other activities normally conducted outside of business and commuter peak hours. Application of these standards could result in some hotels yielding parking densities exceeding 150 parking spaces per site acre, but the sliding scale of parking provision for hotels (included at the request of the Technical Sub-Committee of the COSPAC) would substantially reduce the site densities for larger hotels comparable in size with the Sydney Hilton. However, it is not envisaged that District Y will be proliferated with major convention hotels with large floor areas set aside for bars, lounges and restaurants; and in any case much of the activity in these places would take place outside of business and commuter peak hours. They would be unlikely to be sufficiently accessible to the CBD to be attractive for all day commuters. If they are then the operating conditions may need to be regulated by Council.

83. The Code provides maximum limits to the amount of parking that may be permitted in support of land use activities generally conducted during normal business hours. Because of the generally inadequate street system in and around the Kings Cross Precinct it was decided to limit on-site parking to 50 spaces per site acre. More liberal allowances were made for the Woolloomooloo and William Street Precincts and even more so for the other precincts because of their better accessibility. It is of interest to note that the aggregate number of parking spaces that could accrue from allowing 100 spaces per site acre within the Woolloomooloo Precinct is consistent with the SPA's plan for about 5000 additional cars within the Woolloomooloo basin. The Authority's suggested reduction to 50 spaces per acre is inconsistent with its previous recommendations. But, in any case, this issue is being subject to detailed investigation as part of Action Plan No. 7 - Woolloomooloo and Action Plan No. 14 - Transportation Planning for Eastern District B.

84. As in the case of District X, restrictions concerning access points in close proximity to intersections and on certain streets have been imposed. It should be noted that all of District Y except for the Railway and Brewery Precincts are the subject of Action Plans currently being carried out in 1972 - 73. Traffic and parking are two of the Strategic Planning aspects being investigated in more detail during the conduct of these Action Plans. A preliminary combined review of the Parking Control Code and Floor Space Ratio Code carried out as part of Action Plan No. 14 indicates that in most cases it will be possible to comply with the requirements of the Parking Code without having to provide for special perimeter parking stations to serve these areas. The likely exceptions are the Kings Cross and William Street Precincts. It is envisaged that a parking station over the Kings Cross Road Tunnels should overcome most problems in this regard. This will be investigated fully as part of Action Plan No. 14 in association with Action Plan

No. 8 - Kings Cross Precinct.

85. District Z comprises the balance of the City of Sydney not included in Districts X, Y and P nor in the Institutional Precincts comprising District Q. The Code envisages that all vehicles associated with particular land uses within that District should be parked off-street on-site. It also presupposed that the Floor Space Ratio Code would not allow intensities of development in these areas necessitating accumulations of vehicles likely to prejudice the capacity of the road system serving the City. This has generally been the case although it is theoretically possible to occur in the Flinders Street Precinct. However, it is now thought that the plot ratios allowed within this Precinct could be too high and it is expected that they will be revised in the light of Action Plans for adjacent Precincts and as part of the 1973 - 74 Revision to the Strategic Plan.

86. District P comprises the Western Parking and Business Precinct for which Action Plan No. 4 - Car Parking Stations in the Western Perimeter of the Central Business District has been completed. This plan provides for progressive increases in car parking spaces to serve the CBD in line with increases in road capacity concurrent with completion of various elements of Stage 1 of the North-western Expressway. It makes some contingency plans for further increases in car parking spaces concurrent with completion of various future stages of the Western Distributor and Western and Southern Expressways when and if they are built.

87. Certain blocks with access points capable of fitting the optimum traffic circulation patterns related to the North-Western Expressway ramp configuration have been selected for extensive parking provision; whereas those that do not have been recommended for restrictive parking in line with that proposed for the balance of the CBD. Restrictions concerning access to individual parking stations are proposed; these being the same as those proposed for District X.

88. For all parts of the City irrespective of Parking District the Code makes very specific recommendations for provision of adequate facilities for off-street loading and unloading of delivery and service vehicles. It was recognised that kerbside usage by such vehicles, combined with double parking, cruising and backing and filling into narrow loading docks in old buildings is a major contributor to congestion of the city streets. One of the worst areas for congestion of this nature is the York Street - Sussex Street Corridor where development applications have been received for a number of new buildings.



Provision of the necessary off-street loading facilities within these buildings may make it possible to begin phasing out kerbside loading zones on a block by block basis within 5 years.

#### CORRECTIONS OF SPECIFIC MIS-STATEMENTS

89. The foregoing presents a concise summary of the nature of the Strategic Plan, the Parking Policy and Control Code and the Western Perimeter Parking Action Plan as applied to provision for parking within the City of Sydney. But, in addition, I now propose to deal individually with the numerous misconceptions that appear to exist within the SPA as evidenced by comments in the Chief Planner's Reports Nos. 9/72, 48/72 and 51/72 together with relevant Addenda and Minutes.

90. The statement in Chief Planners Report 9/72 that it is "not clear that the Consultants have made a technical assessment of street capacity on certain desirable standards of movement" is certainly nebulous in the extreme. No attempt was made to define certain desirable standards of movement. Whether it is economic to provide for these certain desirable standards of movement is questionable. General practice is to provide for levels of Service C to D as defined and discussed previously in this Annexure.

91. The statement in Chief Planners Report 9/72 that "the code stipulates the minimum number of spaces which should be provided by a developer on site- the maximum being left to the Council's determination" is almost wholly incorrect and indicates carelessness in reading and interpreting the Code.

92. Within District X (the CBD) the maximum number of spaces permitted on site is specifically indicated for all uses except residential, hotels, motels and service stations. Only in these latter cases is the maximum left to Council's determination. Within District Y (the Eastern Fringe Area) the maximum number of spaces permitted on site for all but certain specified uses is specifically indicated for individual precincts. Within District Z (the balance of the City of Sydney) the minimum number of spaces which should be provided is specified.

93. The statement in Chief Planners Report No. 9/72 that "part of the parking requirement must be provided on site and a contribution made to the Council for the balance to be provided in the Council controlled parking stations" is a complete misinterpretation of Tables Nos. 2 and 5 of the Parking Control Code. These specify the maximum number of car spaces which may be provided on site by the developer.

94. The statement in Chief Planners Report No. 9/72 that "the amount of on-site parking varies. . . . . rising to 150 spaces to the acre at the southern end" is a generalisation that demonstrates a lack of understanding of Table No. 2 of the Parking Control Code. Only on the western side of the CBD in cases where access is available to Kent Street does the Code allow greater than 100 spaces per acre of site area with the CBD.

95. The sections dealing in Chief Planners Report No. 9/72 with "Fundamentals of Parking Policy in the Central Business District" and "Relationship of Parking Policy to Planning Goals" including reference to that nebulous term "essential" parking, are too vague to be answered directly but previous sections of this Report dealing with Objectives and Policies of both the SROP and the CSP have in fact dealt with the Fundamentals of Parking Policy sufficiently to obviate the need for further elaboration here.

96. The comments made under the heading "Parking Policy in the Metropolitan Content" are so vague and nebulous that they require special comment herein. The primary question requiring resolution is - What is Metropolitan Parking Policy?

97. I have heard from time to time and read within these SPA reports under discussion, vague comments about parking facilities being "better located at suburban railway stations and ferry wharves" and "integration with public transport", but in terms of deeds rather than words, the track record of both CUMTAC and SPA is very poor indeed. However, the Public Transport Commission in its first report to Cabinet decided on a number of priorities to improve public transport including "Examination of the feasibility of providing car parking facilities at or near suburban railway stations, particularly where commission land could be made available." This is particularly encouraging in the light of previous policy or lack of it. However, the matter is complex and I propose to offer some guidelines that might be adopted in an attempt to establish a realistic "Metropolitan Parking Policy". These guidelines are directed specifically at the Sydney CBD but are equally applicable to such centres as North Sydney and Parramatta where large concentrations of office workers may lead to the need for extensive public transport services.

98. The steps in setting a Metropolitan Parking Policy should be:-

- a) Assess the areas within the Sydney Region that provide the highest private car usage in the CBD.
- b) Conduct a study of existing and likely future local land use and traffic conditions around each suburban railway station or ferry wharf that might serve any of the catchment areas assessed.

- c) Make an assessment of the Road, Rail and Ferry Route Networks to ascertain realistic catchment areas for those stations or wharves which might intercept road traffic oriented towards the CBD, or to which CBD oriented traffic might be diverted.
- d) Assess whether extensive commuter car parking at these stations is compatible with other land uses in the vicinity of these stations.
- e) Assess whether the rail system has the additional capacity in terms of track capacity, station capacity and platform capacity on the lines to which commuters are diverted.
- f) Select stations or wharves at which extensive commuter car parking facilities might be feasible in the light of the previous guidelines.
- g) Assume financial responsibilities for providing commuter car parks at suburban railway stations.

99. Analysis carried out during the preparation of the CSP indicated that the areas providing the highest private car usage in the CBD are the Eastern Suburbs, the Manly-Warringah area and the Northern Suburbs, and that commuting by car from the other areas is relatively much lower. Hence the most likely stations would be either on the Eastern Suburbs Railway or on the North Shore Line. But the SPA has previously ruled against commuter car parking at Bondi Junction; and here are no plans to provide any at Edgecliff or Kings Cross to serve the CBD. Whether any will be provided at other stations on the Eastern Suburbs Railway is not known, but if Bondi Junction is any guide, it is very doubtful. In any case their suitability would have to be assessed in the light of the considerations indicated in the guidelines previously listed.

100. Many of the stations on the North Shore Line would not be suitable for intercepting a significant amount of traffic from Manly-Warringah or from Lane Cove-North Ryde because of the local street systems. However, all have the potential of drawing some local traffic from residences reasonably close to the station. But as residential development continues to spread away from the existing rail network and stations, additional local commuter car parking facilities will be required to preserve the existing modal split, before any attempt can be made to induce a greater proportion of commuters to use public transport.

101. Diversion of commuters from cars or buses to car-rail or bus-rail will be successful only if the combined car-rail or bus-rail trip is more direct or quicker than a car or bus trip.

As urban areas continue to develop further away from railway lines the chances of this happening become more remote. This was demonstrated in an investigation by CUMTAC in 1966-67 into the feasibility of a bus/rail interchange terminal at St. Leonards Railway Station. I understand that the basic findings of that particular study were that the interchange would not work given a continuation of the existing fare structure and timetable arrangements but that it could be successful in the future if more streamlined arrangements for access, fare structuring and timetabling were introduced. Consequently a realistic rather than an optimistic assessment should be made concerning the possible diversion of commuters to rail at car-rail or bus-rail interchanges.

102. In addition major commuter car parks are often incompatible with major regional centres or sub-centres and also could be incompatible with major bus-rail interchanges. Chatswood is a case in point; where the commuter car park traffic generated is likely to conflict with other locally generated traffic in the area.

103. Stations which may be suitable for future commuter car parking will require constructive, co-ordinated planning to ensure that they do succeed. This applies particularly to a station like St. Leonards which has a prima facie case for early and detailed consideration. Because of the rapid redevelopment that can and does occur at such suburban centres some direct action and guidance by the SPA is required now and not after deliberation of the SATS plan in two years time. Contingency plans should be drawn up quickly in collaboration with Local Councils to protect likely areas against development likely to prejudice future provision of suburban commuter parking stations. This approach was adopted by the Sydney City Council during the preparation of Action Plans No. 3 and 4 for the Wynyard and Western Perimeter Parking areas; when no Development Application likely to prejudice the subsequent carrying out of these Action Plans was approved within that period. A similar approach is being adopted for the other Action Plans where applicable.

104. The little work that has been done in providing commuter car parks free of charge has been done almost to date entirely on the initiative of, and at the expense of, local Councils with little or no financial assistance from the Railways Department. This is a function which is really beyond the financial capability and indeed responsibility of Councils, and the work that has been done has, of necessity, been piecemeal. If a co-ordinated attempt is to be made to provide extensive commuter car parking facilities at suburban railway stations, the financial encouragement from the new Public Transport Commission and other State Government Authorities will need to improve

considerably compared with that given previously by the Railways Department.

105. In formulating policies for commuter car parking facilities at suburban railway stations it should be noted that parking stations are not cheap and that these facilities at suburban railway stations will not attract patrons unless provided free of charge or at a very nominal charge. I do not know whether SATS is investigating the question of commuter car parking along these or similar guidelines. If not, I strongly suggest that some one does and until the SPA can provide a positive and constructive plan for provision of commuter car parking, at suburban railway stations, I consider that the Authority has no grounds for not approving Action Plan No. 4. On balance it is very likely that "park and ride" commuter parking facilities will be needed at suburban railway stations together with parking stations on the Western Perimeter of the CBD,

106. The Statement in Chief Planners Report No. 9/72 that "Pending completion of the Transportation Study, a conservative approach to off-street private parking should be adopted, and the concept of requiring developers to contribute to perimeter parking stations should be held in abeyance" is typical of a laissez-faire attitude not acceptable to the present Council. Typically, the SPA has given no indication as to what is meant by "conservative approach". Does "conservative approach" mean doing nothing, or does it mean restricting parking along the lines indicated by the Parking Control Code?

107. If one assumes that "conservative approach" is meant to imply restricting parking as indicated in the Parking Control Code, the following factors are relevant:-

- a) The Parking Policy took a conservative approach in assessing that the CBD could accommodate no more than 25,000 parking spaces based on road capacity. In the fact, with the removal of some through traffic following completion of the Western Distributor Stage 1, this estimate could be revised upwards. But, taking a "conservative approach", it was decided not to and to seek other advantages in the form of easier movement of those vehicles remaining in the CBD rather than increased parking accumulation at the same level of service. No account was taken of the increased road capacity that should result from diversion of many peak-hour buses out of the CBD following the opening of the Eastern Suburbs Railway - again a "conservative approach".

- b) The SPA in January 1971 produced a Technical Bulletin on Metropolitan Parking Standards. In the section dealing with Commercial Premises, Offices and Professional Chambers, the Authority on the basis of their assumptions concerning net floor area per worker (120 - 150 sq.ft.) indicates that one space per 1,500 sq. ft. of gross floor area is low and "provides only one space for 8 or 9 workers". It goes on to indicate guidelines for a compromise between the necessity to keep parked cars off the road and the accessibility to public transport and cites a standard of 1 car space per 500 sq. ft. of floor area (or about three workers) as appearing "to be a resolution of these conflicting factors". If one space per 1,500 sq. ft. is accepted by the Authority as being low, its opinion describing one space per 2,500 sq. ft. would be of considerable interest. This level of provision required by developers includes perimeter parking as proposed in Action Plan No. 4. In terms of the above, adoption of a code requiring one parking space per 2,500 sq. ft. of gross floor area would appear to be very conservative, if the Authority's definition of "conservative approach" is to restrict parking.
- c) The rate of contribution being levied per car space (\$2,400 in the Tank Stream and Mid-Town Hub Precincts, and \$2,000 elsewhere) was set to be consistent with construction costs and will not provide the complete cost of parking stations on the Western Perimeter of the Central Business District. It will be necessary to provide additional funds to provide for the land cost component and these can be applied as required. These have been discussed in detail on pages 40 and 42 of Action Plan No. 4 - Car Parking Stations on the Western Perimeter of the Central Business District. Several of the more readily applicable are:-
- Imposition of Special Parking Rates;
  - Increasing Fees at Parking Meters;
  - Increasing Fees at Council - owned Parking Stations.

#### MOVEMENT POLICIES - GENERAL

108. Rail: The State Planning Authority appears to imply that these matters are already being acted upon and do not require any interference from the City Council. Concerning bus-rail interchanges outside the City, the Authority and CUMTAC

have made little progress. Some definitive policy is required to state precisely those suburban railway stations which are suitable for:-

- a) Development or re-development as "substantial" or "major" regional centres,
- b) Establishment of bus-rail interchanges,
- c) Establishment of major suburban "park-and-ride" commuter parking stations.

109. Generally, these will be mutually exclusive because of the likely traffic that might be generated although in favourable circumstances it may be possible to combine functions (a) and (b). I have already elaborated upon this earlier in this report. Concerning the extension of the East Hills line, I am not aware of any progress made by CUMTAC through the State Government in planning or in negotiations with the Commonwealth Government.

110. Bus and Ferry Services: Potential improvements that could be made to bus services were outlined in Action Priority No. 5C of the Strategic Plan. Obviously the CBD has the most problems because of convergence of bus services on it from the east, south and west and to a lesser extent from the north. The Strategic Plan saw the need to improve bus operations within the CBD as a top priority. It did not imply, and should not have been interpreted to mean, that action should not be taken elsewhere within the City of Sydney or the inner metropolitan area now served by Government buses.

111. In fact some of the recommendations made under Action Priority 5B apply specifically to improvements that might be made to bus services in the inner suburbs. These were directed mainly at rationalization with the rail services per medium of bus-rail interchanges. Notation was also made of the potential reduction in bus services within the City following opening of the Eastern Suburbs Railway and estimates made. The number of buses that will be removed is substantial and is discussed in Technical Annexure F of the Strategic Plan.

112. Concerning ferries, the waterfront of the City of Sydney can be basically divided into three bays. These are Darling Harbour, Circular Quay and Woolloomooloo. The availability of Darling Harbour for ferry services is a matter for the Maritime Services Board, but previous discussions with representatives of the MSB indicated that all of the wharf area would be required for interstate and overseas shipping. The Consultants have consistently opposed intensive office

development at Woolloomooloo and consequently have made no specific recommendations concerning establishing ferry terminals in Woolloomooloo Bay. Obviously the major location for ferry terminals will continue to be the present location at Circular Quay.

113. Ferry patronage is now relatively high and while every attempt should be made to improve the patronage, projections of upper limits should be realistic. Catchment areas for potential patrons are limited as patrons may change their mode of transport once but are reluctant to do so twice. The fact that the suggestions made in the Strategic Plan are also the concern of CUMTAC and the SPA have so far yielded paltry results.

114. Road; It is of interest that the Authority does not make any comment concerning Policy No. 6 which is to "Seek faster construction of roads by passing the City, manage traffic inside the City to give priority to movements most vital to each Precinct." I accept this omission as a tacit agreement with Priority No. 6 and the four relevant Action Priorities, which of course are in complete concurrence with the "principle of a highway grid aimed at reducing the dominance of the radial pattern focussed on the metropolitan City Centre at increasing the accessibility of the Coastal Areas".

115. But I wish it to be noted that, although the Strategic Plan accepts in principle the location of the Eastern and Western Distributors and Expressways, this should not be interpreted to imply tacit acceptance of the completion of all these facilities in the manner shown by the Department of Main Roads in various publications by that particular authority. The Plan did not envisage that any should be added nor that the locations of those already planned should be significantly altered if, in fact, they are found to be necessary. It considered that such detailed planning was not appropriate at the Strategic Planning level.

#### MODAL SPLIT

116. During the preparation of the Strategic Plan it was determined from the available data that the peak hour modal split between private car and public transport for the CBD workforce was 13 and 87 percent respectively. It was also estimated that this ratio was not distributed uniformly throughout the metropolitan area and that the proportion coming in by car varied between 19 to 20 percent on the eastern and northern approaches, and 8 to 10 percent on the southern and western approaches. Furthermore, it was estimated that less than 5



percent of peak hour commuters from the Intermediate and Outer Western Sectors (as defined in Annexure D of the Strategic Plan) came into the CBD by car. These sectors refer to the area west of Strathfield - Concord and are the sectors which are likely to provide a significantly smaller contribution to the CBD workforce than previously estimated should the contingency estimates postulated in the Strategic Plan be proven to be too high. In the event of the CBD workforce reaching only, say, 300,000, the estimated contributions by the Eastern Suburbs and to a lesser extent the Northern Southern and Inner Western Suburbs are likely to be relatively unchanged. But the relative contribution of the Intermediate and Outer Western Suburbs could decline very substantially. But, it was estimated that they would contribute very little to the number of cars coming into the CBD.

117. The consequence of this is that, although the size of the future CBD workforce postulated as possible in the Strategic Plan may not eventuate, the estimated future numbers commuting by car will not drop significantly and consequently the proportion coming in by car will rise from an estimated 14 to 15-16 percent. This is even more likely if the current trend of executive offices of large corporations replacing trade and manufacturing activities in the CBD continues. But the fact that many executives drive to and from work outside commuter peak periods should not be overlooked.