

# Employment Land Strategy Guideline - Writing Actions

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This paper is a supporting paper to the Employment Land Strategy Guideline. It provides councils with supporting advice on how to write actions for employment land strategies, provides an overview of the type of actions, and examples of the content required for different types of actions.

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## BACKGROUND: Purpose of an Employment Lands Strategy

Employment land strategies provide the basis for future land use decisions in a local government area. Strategies are produced within the context of the relevant regional and district plan and translate the broader strategic context into the rationale for a continuation or change in employment zoning applied in a Local Government Area. The development of strategies may also arise because of recommendations in a Local Strategic Planning Statement.

The local environmental plan (LEP) translates the intent of the strategy into statutory controls; therefore, employment land strategies must provide clear guidance, information, and strategic direction on land use in employment areas. The employment land strategy will provide direction on how to consider any planning proposals relating to employment land.

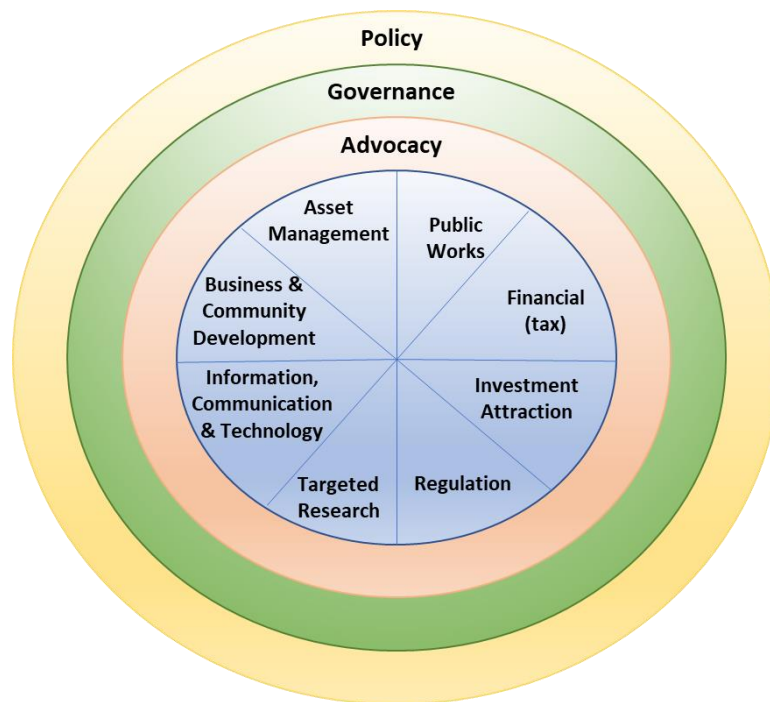
The employment land strategy may result in an update to the Local Strategic Planning Statement and a local environmental plan review.

Importantly, there are also a wider range of actions which could result from seeking to manage land use outcomes, these are described in the next section.

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## Types of Actions

There are a variety of delivery tools (actions) which can be utilised to achieve the land use outcomes of an employment land strategy, refer Figure 1. A number of these may be separately addressed in a wider economic development strategy.



These delivery tools are briefly described here<sup>1</sup>.

- **Policy:** Policy guides an expected outcome such as the NSW *Noise Policy for Industry* (2017). It can vary in status from legislated positions or objectives, to guidance statements on how to approach a task.
- **Governance:** Coordinating activities, decision-making and sharing information requires collaboration, formalised through governance arrangements. This may vary from bespoke organisation such as the Western Parkland City Authority and local chambers of commerce to cross government working groups.
- **Advocacy:** As councils do not control all the levers to achieve an objective, they may need to advocate to State and Commonwealth agencies for a particular objective.
- **Public works:** Public works can directly influence transport projects or public domain improvements.
- **Financial (taxation):** If public works are part of a package of actions, a contribution plan may be used to part fund the works if there is a clear nexus between the works and the land use outcomes being sought.
- **Investment attraction:** While potentially outside the scope of an employment land strategy, attracting economic activity to specific locations is often an appropriate objective, as the goal

<sup>1</sup> Source: Adapted from Dalheim H (n.d.) *Planning Great Cities, A practical guide* (Forthcoming)

of expanding and/or broadening the economic base needs more than changes to land use zones. Investment NSW is the lead agency for these outcomes in NSW.

- **Regulation:** The strategy will identify if and where changes are required to the LEP.
- **Targeted research:** You may need to undertake further research beyond your evidence base – hence there may be actions relating to more detailed and targeted research around specific issues, such as rural lands.
- **Information, communication, and technology:** While actions that create virtual accessibility are generally in the hands of the market, councils can pursue actions for new employment precincts, such as an allowance for ‘dark fibre’ (laid but not connected cable), to support a future market that is already ready to be connected to the digital network.
- **Business and community development:** Developing skills in the community can empower businesses, such as programs to support chambers of commerce that are focused on one centre.
- **Asset management:** Public assets could be repurposed for an alternative use – for example, at-grade car parks could be converted into a different use (active floor space) with broader benefits.

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## Writing Actions

It should be clear from the writing of an action as to both the outcome sought and the task(s) required to deliver it. In addition, it should be clear as to why the action is being pursued this relates to the evidence. Therefore, an employment land strategy should outline some minimum information for each action as part of an implementation section. Including:

- Action title
- Basis of the action (the why), including consultation to-date
- Intended outcome
- Principal tasks to deliver
- Responsibility to deliver and principal partners (as relevant)
- Resource requirements (budget)
- Timing

### For planning proposals

In the case of actions which seek a change to the local environmental plan (LEP), the information should reflect to the requirements for preparing a planning proposal as outlined in the NSW Government’s [\*Local Environmental Plan Making Guideline\*](#) (December 2021). In particular, the basis of

the action and the intended outcomes should be written in a way that provides an early picture of the required information as outlined in the Guideline, refer below.

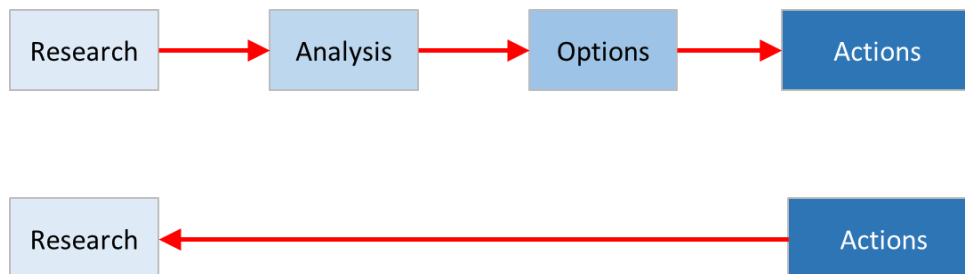
Action content	Guideline requirement
Basis of the action (the why), including consultation to-date.	<p>Part 3 – Justification of strategic and site-specific merit – justification of strategic and potential site-specific merit, outcomes, and the process for implementation</p> <p>Part 5 – Community consultation – details of the community consultation that is to be undertaken on the planning proposal</p>
Intended outcome	<p>Part 1 – Objectives and intended outcomes – a statement of the objectives of the proposed LEP</p> <p>Part 4 – Maps – maps, where relevant, to identify the effect of the planning proposal and the area to which it applies</p>

### Evidence to actions – line of sight

All actions / recommendations should be based on research and there should be a clear line of sight from research (evidence) through to the recommendations (actions) in a strategy. Conversely, it should be possible to trace each action back to specific research findings.

Figure 2: Evidence to actions – line of sight

Source: Dalheim H (n.d.) *Planning Great Cities, A practical guide* (Forthcoming)



### Example actions

The Department has an expectation that actions arising in the preparation of an employment land strategy are easily understood and documented in terms of:

- Why the action is needed (evidence).
- The intended outcome(s),
- The tasks required to deliver that outcome(s),

Examples of the types of actions anticipated to be included in an employment strategy and the information to support them, are outlined below.

## Policy

### Example Action 1 – Preparation of a centres policy

#### Prepare a centre policy

##### Basis for action (evidence)

The principal conclusion underpinning this action is that the population / dwelling growth projected will create an opportunity / need for additional retail floorspace and/or other commercial activity to be accommodated. With that conclusion based on:

- Retail demand projections, based on Department or locally prepared population / dwelling projections, which should, in part, be informed by in-home and/or in-centre retail surveys,
- Potentially an analysis of office development needs, noting the difficulty of preparing definitive local projections, considering the 'overflow' nature of the Greater Sydney office market, and the limited number of office precincts existing across Greater ,Sydney (development activity is not population induced),
- Land use and floorspace surveys for all centres,
- Business / landowner intercept survey.

## Prepare a centre policy

### Intended outcome

A strategy which identifies:

- the general levels of additional floorspace to be accommodated in centres, noting that in most cases it will be the market which initiates actions to realise the potential additional demand,
- certainty in expectations (to investors and the wider community) in the delivery of the additional development,
- the benefits to landowners / developers in delivering on the development opportunities identified – such as streamlined approval processes for development consistent with the strategy,
- the role of individual centres in terms of government investments and potentially a hierarchy of centres to provide certainty for private sector investment,
- the opportunity / need for the preparation of a precinct plan for one or more centres within the local government area. With the purpose of each precinct plan being, in part, how to accommodate additional commercial development,
- The need, as required, to update the Local Strategic Planning Statement.

### Principal delivery tasks

Commissioning the preparation of a centres policy, with a focus on understanding the opportunities, requirements, and implications for attracting additional retail and commercial development.

Engaging with business chambers, businesses, and landowners and the wider community during the preparation of the strategy.

## Example Action 2 – Preparation of a precinct plan for a centre

### Prepare a precinct plan for a centre

#### Basis for action (evidence)

The principal conclusion underpinning this action is that there is an opportunity / need to accommodate additional activity, commercial or residential, in a centre(s) for which the current plan for the centre(s) does not foreshadow. With that conclusion based on:

- population / dwelling projections,
- a retail demand study and/or commercial demand study,
- the findings from a business intercept survey,
- land use and floorspace survey for the centres across the local government area,
- land use survey of industrial and business precincts across the local government area.

## Prepare a precinct plan for a centre

### Intended outcome

Identify the actions required to increase the level of commercial and residential development in and around a centre. With actions such as:

- changes to the Local Environmental Plan (such as zones, FSR's, height controls),
- changes to the Development Control Plan,
- site amalgamation actions,
- transport initiatives,
- public realm initiatives,
- changed use of government owned land (asset management),
- an outline of streamlined approval processes for development consistent with the precinct plan,
- preparation of a Development Contribution Plan.

### Principal delivery tasks

Preparation of a detailed precinct (structure) plan for a centre(s) which includes analysis and direction on:

- The land use outcomes sought, including proposed public activities, such as a library,
- The proposed transport network, including all modes,
- A car parking strategy,
- Landscaping and public realm improvements,
- Built form guidelines,
- Specific intervention areas,
- How all the above are integrated.

Engaging with landowners, business chambers, business, and the wider community in preparing the plan.

Preparation of an accompanying implementation plan – actions, funding, responsibilities, and staging.

## Regulation – Planning Proposals

### Example Action 3 – Convert industrial land to the new productivity support or commercial centre zone

#### Prepare a precinct plan for a centre

##### Basis for action (evidence)

The principal conclusion underpinning this action is that there is a demonstrated demand for retail and/or office development within a local government area, which can be accommodated as part of an extension of the commercial zones of an existing centre. But it requires the conversion of some industrial land, and the consequences of that conversion are understood in a council wide context. The policy basis for such a change is outlined on page 125 of the Greater Sydney Region Plan.

To arrive at such a conclusion, it is likely that the following investigations would need to have occurred as part of the development of an employment land strategy:

- Council wide industrial land review, including the following inputs:
  - Floorspace assessment
  - Land use survey
  - Business intercept survey
- Council wide centres review, including the following inputs:
  - Retail demand projections
  - Land use and floorspace surveys for all centres
  - Business / landowner intercept survey
- A preliminary review of opportunities and to accommodate the additional commercial floorspace within the centres network of the local government area.
- Community / business participation in the development of the new policy position.
- State government liaison in the activities above.

Some of the investigations above may be part of follow-on studies arising from the initial findings of an Employment Land Strategy.

##### Intended outcome

The identification of land for the expansion of an existing centre with the aim of accommodating projected commercial demand.



**Prepare a precinct plan for a centre**

**Principal delivery tasks**

Undertaking an amendment to the local environmental plan in line with the process outlined in the NSW Government’s Local Environmental Plan Making Guideline (December 2021).

**Example Action 4 – Expand the list of permissible uses and/or changes to local FSR/ height controls in an industrial zone**

**Expanding the list of permissible uses and/or changes to local FSR/ height controls in an industrial zone**

**Basis for action (evidence)**

The principal conclusion underpinning this action is that current planning controls un-necessarily constrain the attraction of appropriate activities in an industrial zone – delivering on the ‘manage’ element of the State governments industrial policy as outlined in Objective 23 of the Greater Sydney Region Plan. Such a conclusion would require a council wide industrial land review, and could include the following inputs:

- A floorspace assessment combined with a land use survey and linked to a business intercept survey, providing an understanding of the role, function, and evolution of the industrial precincts within the local government area (Refer Appendices B, C, D, E, & G of the Guidelines),
- Land use survey, with specific attention to identifying prohibited uses,
- Business intercept survey,
- A survey of real estate agents (commercial specialists), aimed at gaining an understanding of the changing needs of businesses together with tenancy profiles, to elicit information on issues such as the need for changed building heights to accommodate high-tech warehouses.
- An assessment of current permissible uses and planning controls against the standard instrument, in the context of the findings from the analysis above.
- Some of the investigations above may be part of follow-on studies arising from the initial findings of an employment land strategy.

**Intended outcome**

Create a more enabling planning system that attracts a greater diversity of activities.

**Principal delivery tasks**

Undertake an amendment to the LEP in line with the process outlined in the *Local Environmental Plan Making Guideline*

## Finance (tax)

### Example Action 5 – Prepare a development contribution plan or a special rate scheme for public works within a centre

Prepare a development contribution plan or a special rate scheme for public works within a centre

#### Basis for action (evidence)

The principal conclusion underpinning this action is that investigations demonstrate that public works are required, such as transport improvements or public domain work. Furthermore, evidence indicates that the public works would enhance / enable additional economic activity within a centre and that all funding options should be investigated to deliver the public works.

This conclusion would require evidence in two of the following three areas:

- Retail / commercial demand assessments, which demonstrate the opportunity for additional economic activity,
- Preliminary transport investigations which foreshadow the need for transport improvements to address the transport demand created by the additional economic activity,
- The findings of a business intercept survey raise poor shopper amenity as a constraint on the performance of the centre.

The evidence would need to demonstrate that existing activity and/or additional activity will create the need for public works and/or there is a clear economic benefit arising from the delivery of the public works, and thus landowners (existing and projected development) should contribute in part to the funding of the works.

#### Intended outcome

Raise part funding for specified public works.

#### Principal delivery tasks

Delivery of this outcome would require activity in two areas:

- If not already undertaken the preparation of a precinct plan for the centre which among other things outlines the details of the required public works including concept plans and costings,
- The preparation of development contributions plan which includes a methodology for apportioning costs, based on the principals of need, nexus, transparency, and equity.

## Asset Management

### Example Action 6 – Conversion of a council car park into a commercial development

Prepare a development contribution plan or a special rate scheme for public works within a centre

#### Basis for action (evidence)

The opportunity to pursue an asset management outcome such as the conversion of a council car park into a commercial development would most likely only be raised in an employment land strategy when the findings of several investigations align. Including:

- The commercial demand to drive such an opportunity was informed by a council wide demand and supply of retail and commercial activity (and potentially residential demand),
- There is a general understanding of a specific development opportunity which will deliver an identified community benefit,
- The opportunity being informed by a preliminary understanding of development feasibility issues, including alternate arrangements for carparking, commercial risks, and the whole proposal showing a positive benefit for the community.

#### Intended outcome

A development which delivers a specific community benefit(s).

#### Principal delivery tasks

To deliver the project and manage risks several activities would be required. Including:

- Preparation of a precinct plan for the centre to ensure the implications of the project are understood in terms of wider outcomes such as traffic management and car parking, pedestrian networks, public realm planning, and urban design outcomes,
- Preparation of concept plans and costings with clarity on how the existing car parking is to be managed,
- Preparation of a development delivery brief, with specific attention to commercial risks.

## Public Works

### Example Action 7 – Enhancement to the amenity of the public realm of a centre or industrial area and/or local roads improvements

#### Enhancement to the amenity of the public realm of a centre or industrial area and/or local roads improvements

##### Basis for action (evidence)

The need to pursue public realm or local road improvements for a centre or industrial precinct would likely be foreshadowed because of the findings of a business intercept survey.

It is likely that the initial identification of a need would trigger the requirement for preliminary investigations to confirm the general need for the public works, which would be documented in the employment land strategy.

##### Intended outcome

Enhance the quality of the public realm or improve the efficiency of the transport system in a centre or industrial precinct.

##### Principal delivery tasks

To deliver the project and manage risks several activities would be required. Including:

- The undertaking of the precinct-based study and/or transport study to confirm the need and provide an understanding of the project in the context of wide precinct based public realm planning or transport networks as relevant.
- The preparation of a detailed delivery plan which covers scope, concept design, and costings and how the proposal sits within the wider public works priorities of the council.

## Targeted Research

### Example Action 8 – Establishment of a biennial industry monitoring survey

#### Establishment of a biennial industry monitoring survey

##### Basis for action (evidence)

The need for additional targeted research, such as required to set up a monitoring program, would likely arise because the level of resources available to fund the additional research were not accounted for in the budget of the employment land strategy. Thus the funding for the research need to be allocated to the implementation phase of the strategy.

### Establishment of a biennial industry monitoring survey

#### Intended outcome

Gain an in-depth understanding of how to establish and/or deliver a program required to implement an employment land strategy.

#### Principal delivery tasks

Delivery of the outcome would occur in two stages:

- Firstly, outline in detail the requirements for the research such as its purpose, intended outcome, anticipated outputs, governance, cost, milestones, and timing – a project brief.
- Then, commission the work or undertake the work internally.

## Governance

### Example Action 9 – Establishment of a Local / state government steering group to oversee delivery of a place-based strategy – such as a precinct plan for a centre.

Establishment of a Local / state government steering group to oversee delivery of a place-based strategy – such as a precinct plan for a centre.

#### Basis for action (evidence)

The need for governance arrangements to guide the implementation of the employment land strategy would likely arise in response to a need to manage the activities (expectations, outcomes, and progress) of multiple stakeholders required to deliver the actions of strategy. With the stakeholders being either internal or external to the council.

#### Intended outcome

Formal agreement to a governance arrangement covering membership, terms of reference, meeting schedule and resourcing.

#### Principal delivery tasks

Liaison with all participating internal departments and/or state agencies to gain an understanding of membership, terms of reference, meeting schedule, and resourcing.

## Information and Communication Technology

### Example Action 10 – Develop a ‘smart city’ strategy

Establishment of a Local / state government steering group to oversee delivery of a place-based strategy – such as a precinct plan for a centre.

#### Basis for action (evidence)

There could be a range of reasons why the need for a ‘smart city’ strategy could arise. Evidence is likely to come from the findings of a business intercept survey and/or community engagement program for the strategy augmented by preliminary investigations into areas such as digital connectivity across the local government area, cyber security, information and telecommunication activities of utility agencies, opportunities created by the actions / policy of a state agency(s).

#### Intended outcome

Establishment of smart city strategy

#### Principal delivery tasks

The commissioning and preparation of a smart city strategy which includes engagement with the business and wider community.

## Business and community development

- Many councils run a variety of business development activities, such as network events and business training as well as working with local chambers of commerce and/or peak bodies. An employment land strategy may identify the need for such activity / enhancements to existing activities.
- These types of initiatives, while important, generally fall outside the domain of land use planning activities.

## Investment attraction

- Many councils run a variety of business attraction activities such as a concierge service. An employment land strategy may identify the need for such activity / enhancements to existing activities.
- These types of initiatives, while important, generally fall outside the domain of land use planning activities, though their need may arise from land use activities, such as the preparation of an employment land strategy.

## Advocacy

- From time-to-time councils advocate for outcomes which are the responsibility of the State government to deliver. Such as the need for specific transport investments. An employment land strategy could identify the need for outcomes which are the responsibility of a state government and thus trigger an advocacy role.
- Delivery of state funded outcomes is likely to be enhanced when:
  - A working group involving state agencies can provide input to the investigations
  - Investigation activities reflect relevant guidelines of state / federal government agencies, or data sets such as the 'common planning assumptions.