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## YATALA ENTERPRISE AREA INDUSTRY AMENDMENT

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments to the City of Gold Coast on the Yatala Enterprise Area Industry Amendment.

Cement Concrete & Aggregates Australia is the voice of the heavy construction materials industry in Australia. Our members operate cement manufacturing and distribution facilities, concrete batching plants, hard rock quarries and sand and gravel extraction operations throughout the nation. CCAA membership produce the majority of Australia's cement, concrete & aggregates, and ranges from large global companies to SMEs and family operated businesses.

Heavy construction materials are vital to delivering the infrastructure required to support Australia's built economy which underpins the development of our nation's physical infrastructure, generating approximately \$15 Billion in annual revenue and employing 30,000 Australians directly and a further 80,000 indirectly.

CCAA **recommends** that Concrete Batch Plants should be defined as a Medium Impact Industry Use in the Gold Coast City Plan, on the basis that:

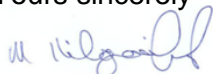
1. The environmental & amenity impacts associated with modern concrete batching operations are more aligned with Medium Impact than High Impact Industry uses.
2. It does not make sense to consume scarce High Impact land with 'lighter' industrial uses.
3. It would provide more flexibility for operators to locate plants closer to the end user as there is more Medium Impact Use land available.
4. It would allow operators the flexibility to change their operations to meet the expected increase in demand for concrete and invest in future innovation.
5. Facilitating industry associated with, or with access to, state transport infrastructure, such as concrete batch plants is key to delivering the *Shaping SEQ: South East Queensland Regional Plan 2023*.

More details on these aspects are provided in Appendix 1.

Queensland's regulatory environment needs to be internationally competitive to continue to attract capital to invest into Queensland to ensure a sustainable and competitive heavy construction materials industry. This in turn facilitates Queensland's improved productivity, housing affordability and lower infrastructure costs.

For further information please contact Roger Buckley, Interim State Director Queensland on Mobile: 0417 401797 or Email: [roger.buckley@cca.com.au](mailto:roger.buckley@cca.com.au).

Yours sincerely



MICHAEL KILGARIFF  
Chief Executive Officer

## **APPENDIX 1**

### **DETAILED COMMENTS ON THE YATALA ENTERPRISE AREA INDUSTRY AMENDMENT**

#### **Importance of concrete**

Every Queenslanders needs 10 tonnes per year of stone, sand, gravel and cement, the basic constituents of concrete, to build the roads, houses and other infrastructure they rely on.

The Government's Big Build and housing program combined with the Olympic Games and renewable energy infrastructure investment will drive unprecedented demand for concrete and construction materials, especially in the Gold Coast area.

As the population continues to rapidly grow in South-East Queensland, and the economy develops, the need for construction grows, as does the demand for essential construction materials such as concrete. Our industry will need to strive more than ever before to provide the Gold Coast with essential resources and construction materials, which underpins the city's sustainable economic growth.

A capable local concrete supply chain is a local industry, supporting local jobs on local projects in their local communities. Appropriate planning of industrial land underpins this ambition.

#### **Importance of Industrial Land**

In recent years, industrial land availability and affordability has been a major issue for Queensland industry, including pre-mixed concrete plants. It is very important that there is a strong supply and development of industrial land with efficient connectivity to transport networks, infrastructure and services to facilitate practical access and use for industrial needs.

Pre-mixed concrete has specific properties which make the location of concrete-batching facilities essential to be close to market and close to major transport links. As such, it is important that the location of concrete plants is not compromised by being too far away from its end use. Pre-mixed concrete is perishable, with a very limited shelf life, and must be produced close to end-use location. It is not suited to being transported over long distances and Australian Standards dictate there is only a limited time for concrete to be mixed and discharged at site.

Therefore, it is vitally important that planning schemes provide appropriate industrial land and seek to protect these areas from encroachment by incompatible sensitive uses. As noted above, concrete needs to be close to its end use, therefore availability of appropriately zoned industrial land to facilitate concrete batch plants is crucial to support a sustainable Gold Coast region.

#### **Concrete Batch Plants and the Yatala Enterprise Area Industry Amendment**

A key consequence of the proposed Yatala Enterprise Area Industry Amendment (YEA) is that if the amendments are adopted, 4 out of the 5 concrete batching operators in the YEA will be in the Medium Impact Industry Zone – a Zone that does not support concrete batch plants as defined in the Gold Coast City Plan. Concrete Batching is defined as a High Impact Industry Use in the Gold Coast City Plan.

This does NOT provide certainty for business to continue to invest in these key construction industry supply chain facilities and may well limit the ability to supply key construction projects in the future during a period of increasing demand for concrete.

Concrete Batch Plants should be defined as a Medium Impact Industry Use in the Gold Coast City Plan, on the basis that:

1. The environmental & amenity impacts associated with modern concrete batching operations are more aligned with Medium Impact than High Impact Industry uses / zones with modern plants operating according to the Queensland Department of Environment, Science & Innovation's [Concrete Batching Code of Practice](#) and the CCAA national [Environmental Management Guideline for Concrete Batch Plants](#).
2. In light of the above and given the scarcity of High Impact Industry zoned land on the Gold Coast, it does not make sense to consume High Impact Industry land with future 'lighter' concrete batching uses. Instead, concrete batching should be redefined in the City Plan as a Medium Impact Industry Use.
3. A Medium Impact Use definition would provide more flexibility for operators to locate plants closer to the end user (which is a requirement of concrete batching given the relative short shelf life of the product) as there is more Medium Impact Use land available on the Gold Coast.
4. If the proposed YEA amendments are adopted, the 4 out of the 5 concrete batching plant operators in the YEA area will be located on Medium Impact Use land, within which concrete batching is not currently supported. A change to the City Plan Use Definitions from High Impact to Medium Impact for concrete batching would allow operators the flexibility (via the appropriate approval processes) to make changes to their operations to flex with future market conditions and invest in future innovation, potentially reducing the sites environmental & amenity impacts even further. This is currently not the case.
5. The *Shaping SEQ: South East Queensland Regional Plan 2023* supports development in Major Enterprise and Industrial Areas such as YEA that facilitates their role in accommodating medium and high-impact industries and other employment uses associated with, or with access to, state transport infrastructure. Defining concrete batch plants as Medium Impact Use is consistent with and facilitates in delivering the *Shaping SEQ* strategy.