

21 January 2026

Land Use Planning  
Metropolitan North  
Department of Planning, Lands and Heritage  
[caraboodadsp@dplh.wa.gov.au](mailto:caraboodadsp@dplh.wa.gov.au)

Dear Land Use Planning Team

**Draft Carabooda District Structure Plan – Consideration of Existing Quarries and  
Appropriate Buffer Distances**

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comment on the Draft Carabooda District Structure Plan (DSP).

CCAA is the peak national body representing Australia's cement, concrete and aggregates industries. Our members supply essential construction materials that underpin housing delivery, infrastructure development and economic growth across Western Australia.

A structural shortage of heavy construction materials (also referred to as basic raw materials) has been identified in the Perth and Peel region by industry, Infrastructure WA and other government agencies. These bodies have also recognised the need for a Heavy Construction Materials Plan to be developed, with the explicit objective of ensuring secure and sufficient supplies of basic raw materials to enable the timely and cost-effective delivery of infrastructure and housing.

In this context, ensuring the long-term viability of extractive industries through sound land-use planning is critical to achieving orderly and sustainable development outcomes. Strategic planning decisions that fail to protect existing resource operations risk exacerbating supply shortages, increasing construction costs, and undermining the State's broader housing and infrastructure objectives. Furthermore, State Planning policy 2.4 identifies this area for limestone extraction.

CCAA is therefore concerned that the Draft Carabooda DSP does not adequately recognise or protect the ongoing operation of existing hard rock and sand quarries located within, or in proximity to, the proposed urban rezoning area.

Existing quarries are strategically important, long-life assets that provide essential materials to metropolitan Perth. These operations are established under lawful approvals and have made significant capital investments based on reasonable expectations of long-term access to their resources. Encroachment of sensitive land uses—particularly residential development—has historically led to land-use conflict, increased complaints, operational constraints and, in some cases, the premature sterilisation of valuable extractive resources.

CCAA strongly submits that the DSP must explicitly account for the presence of existing quarries and ensure that future land-use decisions do not compromise their continued operation. In particular, appropriate separation distances between extractive industries and sensitive receptors are essential to manage impacts associated with noise, blasting, dust, vibration and heavy vehicle movements.

Consistent with established planning practice in Western Australia and guidance applied in other strategic planning contexts, CCAA submits that a minimum 500 metre buffer zone should be maintained between any existing quarry operations and new residential development. This buffer should be clearly identified and protected within the DSP and carried through to subsequent structure planning and subdivision stages.

Failure to incorporate adequate buffers at the district structure planning stage risks creating unacceptable land-use conflicts that are costly to resolve and contrary to the objectives of orderly and proper planning. It also undermines the State's ability to secure long-term supplies of construction materials close to markets, increasing costs, transport distances, emissions and impacts on the broader community.

Accordingly, CCAA recommends that:

- The Draft Carabooda DSP be amended to explicitly identify existing quarry operations within and adjacent to the plan area.
- A minimum 500 metre buffer between quarries and any future residential or other sensitive land uses be incorporated into the DSP framework.
- The DSP include clear policy direction that buffers are to be protected from encroachment and not eroded through subsequent planning approvals.
- Ongoing consultation be undertaken with quarry operators and relevant industry bodies as planning for the area progresses.

CCAA would welcome the opportunity to discuss these matters further and to assist in ensuring that the Carabooda DSP achieves balanced outcomes that support housing delivery while safeguarding the continued supply of essential construction materials.

We would welcome the opportunity to meet to discuss this matter further and collaborate on a workable solution. Please contact our State Director, Jason Kuchel at [REDACTED] or on [REDACTED]

Yours sincerely

[REDACTED]

MICHAEL KILGARIFF  
Chief Executive Officer