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State Planning Office
Department of State Growth
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Draft Southern Tasmanian Regional Land Use Strategy Review

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide feedback to the Department of State Growth on the draft *Southern Tasmanian Regional Land Use Strategy (STRLUS)*.

CCAA is the voice of the heavy construction materials industry in Australia. Our members operate cement manufacturing and distribution facilities, concrete batching plants, and hard-rock, sand and gravel extraction operations across the nation. Collectively, CCAA members produce the majority of Australia's cement, concrete and aggregates, and include organisations ranging from large global companies to SMEs and family-owned businesses.

Representing an industry that generates \$15 billion in annual revenue and supports the employment of approximately 110,000 Australians, CAA supports effective and efficient regional land use planning to ensure a sustainable industry.

1 Executive summary

CCAA supports the Vision and Outcomes of the draft Southern Tasmania Regional Land Use Strategy (STRLUS) to provide a long-term, integrated framework for settlement, infrastructure, economic development and environmental outcomes.

However, the draft Strategy does not yet adequately address a critical enabling constraint: the secure, affordable and proximate supply of essential construction materials—particularly sand and aggregates—required to deliver the Strategy's housing, infrastructure, transport, and climate objectives.

This omission is significant given:

- the Geological Survey of Tasmania (MRT) Technical Report 46, which concludes that sources of coarse concrete sand in South-East Tasmania are effectively exhausted; and
- ongoing land-use conflict, approval delays, and resource sterilisation risks that directly threaten material supply, cost, emissions performance, and project feasibility.

Without stronger and explicit policy direction to protect strategic extractive resources, enable timely approvals, and plan for future sand supply, STRLUS risks undermining its own objectives on housing affordability, infrastructure delivery, emissions reduction, and economic resilience.

CCAA therefore **recommends** targeted amendments to STRLUS across Productive Resources, Industry and Employment Lands, Settlement and Housing, Transport and Freight, Climate Change, and Implementation to ensure the Strategy is realistic, deliverable, and evidence based.

2 Overarching recommendation

CCAA recommends that STRLUS explicitly recognise construction material supply as essential enabling infrastructure, and embed clear regional policy directions to:

- protect existing and future extractive resources from incompatible land-use encroachment;
- respond strategically to the South-East Tasmania concrete sand supply constraint;
- streamline and coordinate approvals across agencies and jurisdictions;
- protect and provide suitable industrial land for concrete batching, processing and recycling; and
- support lower-carbon and circular economy outcomes through planning and procurement settings.

3 Detailed comments by STRLUS theme

3.1 Growth Management

Statement of Intent:

Cities, towns and villages grow sustainably and efficiently.

Relevant Outcomes

- **1.1–1.3** Housing is accessible, affordable and well located
- **1.6** Infrastructure planning considers cost and ability to deliver

CCAA position

CCAA supports the Growth Management intent and outcomes of STRLUS with a strong emphasis on housing supply and affordability. However, STRLUS does not explicitly recognise construction material availability and transport distance as a factor affecting housing affordability, infrastructure cost and delivery timeframes.

With local concrete sand resources exhausted, concrete inputs in Southern Tasmania are already subject to rising transport distances and costs—pressures that will intensify without strategic intervention.

This omission presents a material risk to the achievability of Outcomes 1.1–1.3 and 1.6.

CCAA recommends

That Section 3.1 be strengthened to explicitly require Growth Management and settlement planning to:

- acknowledge access to sand, aggregates and concrete as an enabling input to housing and infrastructure delivery;
- avoid land-use outcomes that increase reliance on long-distance material transport; and
- recognise that rising material transport costs directly affect housing affordability and project feasibility.

Suggested insertion (new Regional Strategy under 3.1):

“Ensure settlement and housing growth planning is supported by efficient, proximate access to essential construction materials to maintain housing affordability, infrastructure feasibility and timely delivery.”

3.2 Natural Assets and Environmental Values

CCAA position

CCAA supports the protection of environmental, landscape and agricultural values under Section 3.2. However, the Strategy does not adequately address the risk of resource sterilisation, where state significant extractive resources are unintentionally lost due to incompatible land use or encroachment.

This is particularly critical for sand and aggregate resources, which are finite, location-specific, and cannot be substituted without cost and emissions impacts.

The recently released Geological Survey of Tasmania Technical Report 46, [A study of the sand inventory of southeastern Tasmania](#), provides clear evidence that South-East Tasmania’s supply of concrete-grade coarse sand is effectively exhausted, meaning essential future supply will rely on:

- new resource identification and development;
- transport from increasingly distant locations; or
- alternative manufactured and recycled materials.

Without clear strategic land use planning protection, potential future state significant resources are at high risk of land-use sterilisation.

CCAA recommends

That Section 3.2 be strengthened to:

- explicitly recognise extractive resources as a legitimate and necessary land use, alongside agriculture and other productive uses;
- protect strategic, state significant extractive resource areas (existing and prospective) from incompatible development;
- apply appropriate buffers to avoid reverse-sensitivity conflicts; and
- include a clear referral role for Mineral Resources Tasmania (MRT) where land-use decisions may constrain future access to state significant resources. This should clearly state that land use decisions within 1 km of mining leases must be referred to MRT with MRT comments mandatorily included in the planning authority’s decision. This would include strategic decisions such as expansion of the Urban Growth Boundary.
- explicitly acknowledge the sand supply findings of Geological Survey of Tasmania Technical Report 46 as a material planning consideration.

3.3 Climate change and emissions reduction

CCAA position

STRLUS appropriately prioritises emissions reduction but does not sufficiently recognise that material proximity is a major, immediate emissions lever. If concrete sand must be transported hundreds of kilometres due to local resource loss, emissions will rise—regardless of downstream efficiency measures. Protecting local supply chains often delivers larger emissions savings than marginal efficiency gains elsewhere.

CCAA recommends

STRLUS should:

- explicitly treat local access to construction materials as an emissions-reduction measure;
- support performance-based specifications that enable lower-carbon concrete, manufactured sands and recycled content; and
- align planning outcomes with circular economy objectives.

3.4 Environmental Hazards

CCAA position

CCAA supports the hazard-avoidance and risk-reduction approach in Section 3.3. However, hazard planning should also recognise the supply-chain resilience risk created by forcing construction materials to be sourced from increasingly distant locations.

Longer transport distances increase exposure to fuel price volatility, weather disruption and infrastructure constraints.

CCAA recommends

That Section 3.3 acknowledge that:

- maintaining local access to construction materials contributes to regional resilience; and
- supply-chain distance should be considered alongside other risk factors when planning for long-term resilience.

3.5 Economy, Employment and Centres

Including Industry and Employment Lands

Statement of Intent:

A strong, diverse and resilient regional economy.

CCAA position

CCAA supports the Strategy's recognition of regionally significant industrial precincts (Figure 16) and employment land. Concrete batching plants, resource processing and recycled material facilities are essential industrial activities that underpin almost all other forms of development. They require appropriately zoned, serviced, and well-located industrial land. These uses are increasingly exposed to reverse sensitivity conflicts and land-use pressure from encroaching residential and mixed-use development.

These uses are increasingly exposed to:

- encroachment from sensitive land uses; and
- loss of appropriately zoned and serviced industrial land.

This directly translates into longer haul distances, higher construction costs, and increased greenhouse emissions.

CCAA recommends

That Section 3.4 be strengthened to:

- explicitly recognise concrete batching, quarry processing and C&D recycling as essential industrial activities;
- protect existing and future industrial land required for these uses;
- support co-location of batch plants with extractive operations, where appropriate; and
- discourage rezoning that undermines established industrial operations and freight-dependent activities.

3.6 Transport and Infrastructure Including Roads, Freight and Ports

CCAA position

Heavy construction materials are high-volume, low-value products where distance matters. When local resources are constrained, freight movements increase substantially, placing pressure on regional road networks and communities.

CCAA strongly supports the protection of key freight corridors under Section 3.5.2, particularly last-mile freight routes.

However, STRLUS should more clearly acknowledge that construction materials are a core freight task, not a peripheral one. Nationally, the construction-materials freight task is among the largest in Australia, accounting for around 39 per cent of national road-freight tonnage and 21 per cent of tonne-kilometres. Similar rates could be expected for Tasmania.

Planning decisions that force longer haul distances shift costs from land-use planning into transport networks, emissions, and community impacts.

CCAA recommends

That Section 3.5.2 explicitly:

- recognise sand, aggregates and concrete as strategic freight commodities;
- integrate land-use planning for extractive and industrial sites with freight corridor protection; and
- avoid land-use decisions that increase heavy vehicle travel distances and community impacts.
- support freight-efficient locations for concrete batching, materials processing and recycling.

Chapter 4 – Implementation, Monitoring and Review

4.2 Implementation

CCAA position

CCAA supports the whole-of-government intent in Section 4.2, but notes that fragmented and sequential approvals across councils, MRT and EPA remain a major barrier to material supply certainty.

The latest CCAA research indicates that delays in approving increases in quarry production by the EPA is expected to result in a whole of state shortfall of hard rock production of 1 million tonnes within 3 years.

This fragmentation directly exacerbates the concrete sand supply constraints identified by MRT. Strategic intent without implementation reform will not resolve the documented supply challenges facing Southern Tasmania.

CCAA recommends

That the Implementation Plan:

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Aggregates Australia**

- include specific actions to improve cross-agency coordination for extractive and construction material supply projects;
- identify a clear point of accountability for coordinating approvals (e.g. a quarry approvals coordination function);and
- prioritise actions that protect and enable access to construction materials critical to STRLUS delivery.

4.3 Monitoring and Review

CCAA recommends

That monitoring of STRLUS implementation include indicators such as:

- availability of key construction materials;
- average transport distances for sand and aggregates; and
- implications for cost, emissions and project delivery risk.

This would provide an evidence-based feedback loop to support adaptive planning.

Conclusion

CCAA supports the objectives of the draft Southern Tasmania Regional Land Use Strategy. However, to be effective, the final Strategy must explicitly address the documented and worsening constraints on construction material supply, particularly the exhaustion of concrete sand resources in South-East Tasmania.

By strengthening STRLUS policy directions on resource protection, industrial land, approvals coordination, and emissions-efficient supply chains, the Tasmanian Government can materially improve the deliverability of housing, infrastructure and climate outcomes across the region.

CCAA welcomes continued engagement with the State Planning Office to refine STRLUS and support its successful implementation.

To discuss this submission further, please contact Roger Buckley, State Director Vic/Tas at roger.buckley@ccaa.com.au.

Yours sincerely

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