

13 April 2022

Planning Reform Team  
Department of Planning, Lands & Heritage  
140 William Street  
Perth WA 6001

Via email: [planningreform@dplh.wa.gov.au](mailto:planningreform@dplh.wa.gov.au)

**SUBJECT: DAP REFORMS**

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments to the Department of Planning, Lands & Heritage (DPLH) on the proposed reforms of Western Australia's Development Assessment Panel (DAP) system.

CCAA is the peak industry body for the heavy construction materials industry in Australia including the cement, pre-mixed concrete and extractive industries. Our members operate cement distribution facilities, concrete batching plants, hard rock quarries and sand and gravel extraction operations throughout Western Australia. For your information, a list of CCAA members in Western Australia is provided in Appendix 1.

CCAA members nationally account for 80% of total industry output, with the industry generating \$15 billion per annum in revenue, employing 30,000 Australians directly and supporting the employment of a further 80,000 people. CCAA members produce and supply the heavy construction materials that are used to construct Western Australia's infrastructure. Providing both the raw material and finished product, heavy construction materials contribute to the construction of our roads, railways, bridges, ports, airports, hospitals and school.

CCAA's members service local, regional and national building, construction and infrastructure markets. The reliable and cost-effective supply to these markets is fundamental to sustainable growth and it is CCAA's aim to promote policies that recognise the importance of these materials to Western Australia's sustainable future.

CCAA supports in principle the proposed reforms to the DAP system with the following recommendations to further improve the system to enable more consistent decision making that delivers better planning outcomes for the State.

**District Development Assessment Panels**

- CCAA **recommends** that the current practice of the applicant having 28 days from the decision being made to appeal a decision to the State Administrative Tribunal is continued with no third-party appeal rights.
- CCAA **recommends** that the specialist members of the DAP Panel should be appointed based on the expertise required for the application. This may include the experience listed under Regulation 35 (1) (a), i.e., urban and regional planning, architecture, urban design, civil or structural engineering, landscape architecture, environmental impact assessment **as well as** the option of including an industry expert in the industry of the application, e.g., extractive industry.

**Special Matters Development Assessment Panels**

- CCAA **recommends** that the threshold to be eligible for a Special Matters DAP should be the construction value threshold as stated **OR** a suitable economic value that would be delivered to

the state by the proposed project. This would provide a more robust threshold criteria that would enable projects that may have a relatively low construction cost but with a high economic value to the State to be assessed by a State-run process. This ensures that not only local issues are considered, but broader state significant issues are also taken into account when determining the merit of the proposal. Several other states have similar planning assessment processes to the Special Matters DAP based on the broader strategic significance to the state including the infrastructure, economic and social benefits, or employment opportunities the proposal may provide, not just the construction value.

- CCAA **recommends** that the Resource Projects criteria is expanded to include all resource projects, not just renewable energy projects.
- CCAA **recommends** that an additional Project Criteria is added that covers *Industrial uses that provide essential materials for State significant infrastructure and construction projects*. Such projects maybe complex and contentious, involving significant capital investment, significant local employment, delivering significant economic value to the State and are essential for the local supply of affordable heavy construction materials that helps deliver affordable Government infrastructure and local construction. Projects such as quarries and concrete batch plants would be included under this criterion.

Incorporating these recommendations will help to deliver a more flexible, responsive, consistent, streamlined, and contemporary planning system that can support the affordable supply of heavy construction materials, helping to deliver affordable Government infrastructure, building Western Australia's economic recovery and creating jobs.

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

There is no more important time than now for the construction sector, supported by an efficient heavy construction materials supply chain, to provide the engine to build Western Australia's economy and create jobs.

Please do not hesitate to contact me to discuss any of these issues in more detail.

Yours sincerely



**ROGER BUCKLEY**






**State Director Western Australia**

**APPENDIX 1**

**CEMENT CONCRETE & AGGREGATES AUSTRALIA**

**MEMBERSHIP**

**FOUNDATION MEMBERS**

 <p><b>ADBRI</b> Adbri Limited</p>	 <p><b>Boral Australia</b></p>	 <p><b>Cement Australia Pty Ltd</b></p>
 <p><b>Hanson</b> HEIDELBERGCEMENTGroup Hanson Australia Pty Ltd</p>		 <p><b>Holcim</b> Holcim (Australia) Pty Ltd</p>

**WESTERN AUSTRALIA**

**ORDINARY MEMBERS**

<p>Flyash Australia Pty Ltd Fulton Hogan Industries Lime Industries Pty Ltd</p>	<p>Pilatti Bros Transport Ransberg Pty Ltd T/a WA Premix and WA Bluemetal Urban Resources Pty Ltd</p>	<p>B &amp; J Catalano Pty Ltd</p>
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**ASSOCIATE MEMBERS**

<p>Concrete Colour Systems Concrete Waterproofing Manufacturing Pty Ltd T/a Xypex Australia</p>	<p>GCP Applied Technologies Sika Australia Pty Ltd Westrac</p>	
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