

19 September 2023

Draft Shaping SEQ – SEQ Regional Plan - 2023 Update
ShapingSEQ 2023 Update Project Team
PO Box 15009
CITY EAST QLD 4002
Via email: ShapingSEQSubmissions@dsdilgp.qld.gov.au

Dear Shaping SEQ 2023 Update Project Team

Re: Draft Shaping SEQ South East Queensland Regional Plan – 2023 Update

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide feedback on the **Draft Shaping SEQ South East Queensland (SEQ) Regional Plan – 2023 Update (the Plan)**. CCAA is the peak industry body representing the \$15 billion-a-year heavy construction materials industry in Australia. Our members are involved in the extraction and processing of quarry products, as well as the production and supply of cement, pre-mixed concrete and supplementary materials. More information about the industry is available on the [CCAA website](#).

Nationally, our sector employs approximately 30,000 Australians directly and a further 80,000 indirectly. In Queensland, the cement, concrete and aggregates industry has a long and proud history, having supported the State for almost 200 years. Employing more than 8,000 people directly, and 18,000 indirectly, our industry is based in all parts of the State, producing approximately 45 million tonnes of sand, stone and gravel (ie aggregates); 7.2 million cubic metres of pre-mixed concrete; and 2.2 million tonnes of cementitious material (eg cement, flyash) each year.

Our members play a critical role in building the economy and delivery of the State’s infrastructure, particularly through the materials supplied for critical pieces of development such as bridges, roads, schools, community facilities, and hospitals. We are a key component of the supply chain for the building industry, and the ability of our members to efficiently provide product to market is of fundamental importance.

CCAA comments on the Plan

Goal 1 – Grow

As outlined in the Plan, SEQ’s population is expected to increase from 3.6 million to 6 million (an increase of around 2.2 million) by 2046¹. It is therefore vital that extractive resources are protected and accessible, adequate industrial land is available for concrete production, and efficient and effective freight networks are maintained to support this future growth and needs of the population. An ongoing, reliable and cost-effective supply of heavy construction materials (i.e. concrete, cement and aggregates) is critical if the outcomes of the Plan are to be achieved.

Population growth is a catalyst for increased demand for heavy construction materials, and the Plan details the need for 900,000 new homes, >1 million new jobs, as well as the acceleration of the 10 year pipeline of development, construction, major transport and infrastructure projects in response to the Brisbane 2032 Olympic and Paralympic Games. The Plan also recognises construction as one of the 'top 5 industries in SEQ', and outlines key focus areas including facilitating affordable housing close to CBDs, increased housing densities, and road and freight infrastructure development.

The construction of the Brisbane 2032 venues, in addition to the strong pipeline of infrastructure works, will be a significant challenge for the State Government and industry. In particular, operating hours restrictions imposed on the construction materials industry operations (typically 7am until 6pm) will impact on the ability to deliver materials. The temporarily lifting of constraints will be required to facilitate the construction works during this period and CCAA is keen to discuss the ways in which this will be achieved with the Department and other agencies.

Therefore, the construction materials industry, including CCAA members' operations, are critical to achieving the outcomes of the Plan. However, CCAA members are faced with the issue of urban development encroachment on existing sites (both extractive and concrete batching plants) which may lead to the imposition of a new regime of operating consents that affect operating procedures and haulage routes. CCAA therefore believes it is vital that local government schemes appropriately reflect the State Planning Policy and identify and zone Key Resource Areas and extractive resources appropriately.

Goal 2 – Prosper

CCAA is supportive of the Plan's increased focus on industrial land, including the need for a strategic region-wide industrial land strategy for SEQ, and the identification of critical shortfall of industrial land, which has flow-on effects for the delivery of the significant housing and infrastructure requirements for SEQ. CCAA notes that the Plan's Industrial Land Strategy seeks to remedy this shortfall through a regional approach to industrial land use planning.

CCAA believes that it is essential that this regional approach considers issues specific to the construction materials industries, such as transport distances when planning for future industrial land. Ensuring that the spatial distribution of these industries close to the areas of development they are to service will significantly contribute to the Plan's ability to deliver affordable housing and reduce the cost of delivery of supporting infrastructure and development.

It is acknowledged that the Plan's Regional industrial land strategy seeks to accommodate medium and high-impact industry in the defined Major Enterprise and Industrial Areas (MEIAs) across SEQ, and seeks to enable the intensification and expansion of these areas. However, there is no recognition that a range of such industries are existing outside these defined areas, or that social and economic drivers may necessitate the location of such industries outside these defined areas in the future. The Plan must ensure that all local government planning schemes acknowledge existing and facilitate future high impact industries, such as concrete batching plants.

For example, the Draft City of Ipswich Planning Scheme does not contain **any** land zoned for High Impact Industry, and High Impact Industries (which includes Concrete Batching Plants) are not identified as 'development that is expected in' any of the City of Ipswich's industry-related zones. High Impact Industry is only specified in those Categorisation Tables for 'Rural, Recreation, Environmental Management and Conservation Zones' and 'Community Facilities, Tourism, Tourist Accommodation, Special Purpose and Limited Development Zones' - identified as Impact Assessable in zones that would typically not be considered suitable for High Impact Industry.

The exclusion of this High Impact Industry from the Categorisation Tables of industry-related zones and its inclusion in likely unsuitable zones, is notable and does not reflect the critical importance of these types of activities to the future of the City of Ipswich.

The Plan's Industrial Land Strategy also seeks to address Queensland's waste resource recovery and recycling targets. The construction materials industry already contributes to resource recovery and recycling, through increasing opportunities to recycle and reuse waste construction materials, such as concrete, construction and demolition waste and asphalt. As noted in the Plan, 58% of SEQ's waste is recycled and this is being led by construction and demolition waste recovery. The Queensland Planning Framework and associated environmental and waste frameworks must be enhanced to reduce 'green tape' and provide opportunities for the construction materials industry to evolve and increase recycling and reuse within the sector to achieve circular economy outcomes.

Goal 3 – Connect

CCAA is supportive of the Plans acknowledgement that integration of land use and transport planning is essential to improve connectivity and accessibility within the region. The industries represented by CCAA have a significant stake in relation to transport, as both users of, and suppliers to the Queensland road network, making up approximately 10% of the overall road freight task in Queensland. Road freight networks are critical for economic growth, improved productivity, and ensuring that operators can meet the needs of their customers, and CCAA strongly supports improved heavy vehicle access for industry, and the promotion of strategic road freight routes for higher productivity vehicle access.

Element 4: Integrated planning: Infrastructure and land use planning and delivery are integrated (pg. 123)

CCAA believes that with the strong population growth of SEQ, integrated transport and land-use planning for future freight requirements is essential. The growth of SEQ is dependent on the capacity of the industry to supply extractive materials. As extractive resources are high volume low cost materials, industry operations must be located close to the communities that use them. Pre-mixed concrete has 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 there is only a limited time for concrete to be mixed and transported at site.

Therefore, transport is a significant component of the overall costs and environmental impact of heavy construction materials. In this context, improving transport efficiency for the industry makes a considerable contribution to environmental, social and economic sustainability outcomes.

Goal 4 – Sustain

As noted above, the extractive industry is geographically limited by both the locations of suitable geology, and proximity to the markets to be supplied to provide low-cost delivery of infrastructure and community needs. This unique attribute of the industry needs to be recognised in higher protection and facilitation of development and operation of these critical natural resources.

CCAA is therefore supportive of the inclusion in the Plan of the need to protect and manage extractive industry through ***Sustain - Element 6 – Natural Economic Resources (pg.144):***

6.2 Protect and manage the region’s limited extractive resources, such as sand and quarry rock, to ensure the ready availability of construction materials to support cost-effective development into the future (Map 18, Table 16 pp 160,161).

However, CCAA members have noted that under the current Queensland Planning framework, these protections are either not being afforded to extractive resources or are being eroded through local government planning schemes that conflict with the State Planning Policy in relation to extractive resources (i.e. Key Resource Areas).

For example, CCAA members have provided feedback that the Gold Coast City Council 'in situ vegetation protection' provision prescribed by the Planning Scheme’s environmental significance overlay, prohibits development within the entirety of the Northern Darlington Range Key Resource Area (KRA), recognised in the State Planning Policy as the main long-term source of aggregates for markets in the Brisbane-Gold Coast growth corridor. The City of Gold Coast Council’s advice in relation to a recent, relatively small (~4ha) extension of extractive industry within the Northern Darlington Range KRA for extractive industry is that:

Council officers do not consider there to be any other matters (economic or otherwise) which would overcome the extent of conflict and resulting departure from the intended development outcomes of the City Plan should a favourable outcome be considered.

That is, the protection of vegetation in situ (negating any opportunity for offsets) outweighs the protection of extractive materials within a declared KRA.

In another example, the Draft City of Ipswich Planning Scheme does not provide any land zoned for the development of 'Extractive Industry', even where land is identified in the State Planning Policy as a Key Resource Area (KRA). The two (2) current KRAs within the City of Ipswich are instead zoned 'Rural', despite both being established quarries. While these two (2) existing KRAs are recognised through the Extractive Resources Overlay, with a purpose to protect extractive resource areas and transport routes from incompatible development, Extractive Industry is not identified as a 'development that is expected in the Rural Zone' and the Categorisation Table for the Rural Zone is silent on Extractive Industry.

The CCAA and its members recognise and support the goals of the Plan to protect natural systems and resources, balancing growth needs with achieving better biodiversity outcomes. However, this cannot be to the detriment of achieving all other goals of the plan in relation to delivering the affordable housing, development and infrastructure required to support the growing SEQ region.

Element 7: Climate change: The effects of climate change are managed to optimise safety and resilience both for communities and the natural environment.

Our industry supports a balanced approach based on partnership and collaboration and recognises the importance of managing greenhouse gas emissions to avoid the negative impacts of climate change.

In 2021, the Cement and Concrete industry declared its ambition to deliver net zero carbon cement and concrete to Australian society by 2050. Concrete is the world's most widely used building and construction material and is vital to securing a resilient built environment that is sustainable for life. With demand for durable and sustainable housing as well as public infrastructure expected to rise strongly in response to population and economic growth, the demand for concrete will increase.

The industry recognises the challenges of climate change and outlines the industry's commitment to work towards decarbonisation throughout the value chain, with a strong emphasis on technological, regulatory, structural, and behavioural change. CCAA, in partnership with CIF (Cement Industry Federation) commissioned VDZ, a consultancy with concrete expertise, to provide a report on the pathways for the Australian cement and concrete sector to decarbonise in late 2021. The report can be read on the [CCAA website](#).

Chapter 3 – Part B – The Regional Growth Pattern

The Plan outlines a framework for the Regional Growth Pattern including the Regional Landscape and Rural Protection Area (RLRPA) which has the intent to protect the values of this land from encroachment by urban and rural residential development, and support development and economic growth of rural communities and industries. CCAA is supportive of the inclusion of natural economic resources including extractive resources in the Regional Landscape and Rural Protection Area (Map 20 – Regional Land Use Categories) (pp, 178,179) which states that the RLRPA includes:

10. natural economic resources, including extractive resources and forestry plantations

CCAA is also supportive of the Rural Living Area (RLA) land use category outlined in the Plan to minimise the impact of rural residential development on current and future productive rural activities (e.g. agriculture, intensive animal industries and extractive resources) through Rural Living Area Principle 5 (pp. 182, 183) which states that:

5. the RLA is not located where it would threaten planned or established intensive animal industries, extractive resource activities or other hard-to locate uses

Chapter 4 - Strengthening the Planning Framework to Deliver the Shaping SEQ Regional Plan

The Plan recognises that Planning has an important role in reducing housing supply costs. Key to this is the provision of a Planning framework that permits and protects construction materials industries, such as extractive industry and high impact industries (including concrete batching plants), located close to the areas being developed.

The Plan discusses a 'built-in' implementation assurance framework, to address the challenge of the translation from policy to implementation. It is critical that this implementation assurance framework improves the effectiveness and outcomes of State Interest Checks of local government planning schemes. As outlined above, there are clear examples of local government planning schemes being in significant conflict with the State Planning Policy and the intent of the Plan.

The implementation of the Plan must include a requirement that each local government planning scheme includes sufficient High Impact Industry and Extractive Industry Zones, and mechanisms that ensure planning schemes facilitate the development of these uses in appropriate locations (i.e. these zones) without imposing restrictive requirements that result in constraining development and making the supply of these critical resources uneconomical, thereby further increasing construction costs for housing, infrastructure and services. Using the Northern Darlington Range KRA example, the recognition of KRAs and non-KRA extractive industries in a planning scheme (e.g. via an overlay), does not provide sufficient protection or facilitation of the development and operation of these critical resources.

The SEQ Planning Framework should maintain the ability of our sector to provide essential construction materials and not create further constraints, and recognise the critical importance of extractive industry, whether within a KRA or not, to provide for the delivery of housing, infrastructure and services.

Recommendations from Shaping SEQ – South East Queensland Regional Plan 2017

CCAA members have also reviewed the current [South East Queensland Regional Plan 2017](#) and made the following recommendations for the new Plan:

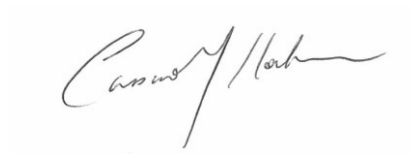
Page 83: CCAA members support the retention of clauses which promote protection and development of extractive resources and suggest that this could be expanded to other compatible industries including recycling, concrete batching, asphalt manufacture, and other ancillary activities.

Page 91: CCAA members suggest amending to not only include 'Key Resource Areas' but all existing and future identified extractive resources.

Page 133: CCAA members suggest that all 'extractive industry' was captured in the Special Use Category.

Thank you for the opportunity to provide feedback on the **Draft Shaping SEQ South East Queensland Regional Plan – 2023 Update**. CCAA is keen to continue working with the Department with the implementation of the plan, and if you have comments about the feedback, please contact Roger Buckley on roger.buckley@cca.com.au or 0417 401 797.

Yours sincerely



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ⁱ [South East Queensland is growing - Ministerial Media Statements](#)