

**DRAFT**

14 July 2023

Draft Ipswich Plan 2024  
Chief Executive Officer  
Ipswich City Council  
PO Box 191  
Ipswich Qld 4305  
Via email: [planningscheme@ipswich.qld.gov.au](mailto:planningscheme@ipswich.qld.gov.au)

Dear Ipswich City Planning Team

**Re: Draft Ipswich Plan 2024**

Cement, Concrete and Aggregates Australia (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. We welcome the opportunity to provide feedback on the ***Draft Ipswich Plan 2024*** (draft Planning Scheme).

**About our industry and its products**

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 and hospitals. We are a key component of the supply chain for the building industry, as the ability of our members to efficiently provide product to market is of fundamental importance.

**Essential materials for the state's infrastructure and building and construction needs**

The sector is a critical part of the supply chain for meeting the current and future construction needs of Ipswich City. As the population grows, as our economy develops, and the need for construction grows, so does the demand for materials such as sand, stone, gravel and cement. This is particularly important in the context of the following:

- Each Queenslanders consumes at least 10 tonnes per annum of quarry material to support the building of roads, houses and other infrastructure to service their needs.
- Quarries can only be located in certain geological areas and transport costs. An extra 100km haul distance increases material costs by an estimated 36%.
- Construction materials make up about one-third of all Government infrastructure costs. Each km of a new 2 lane asphalt highway needs about 14,000 tonnes of crushed rock, or about 400 truck-loads of material.

- Extractive resources are finite, site specific and limited in occurrence by geological conditions. Extractive resources are high volume low cost materials.
- Extractive industry operations must be located close to the communities that use them if they are to be economically viable and not impose too great an environmental and social cost. In addition, the extractive industries involve minimal value added processing of raw materials.
- Due to its chemistry, concrete is a perishable product, with a very limited shelf life, and there must be produced close to end use location. It is not suited to being transported over long distances.

#### **Overall comments on the draft Planning Scheme**

The Ipswich City Council website highlights its city as a key regional growth area in South-East Queensland, that is growing and changing at a fast pace, and with a population that is expected to grow from approx. 247,000 to 535,000 by 2046<sup>1</sup>. The Draft Planning Scheme sets out the intention for future development for the City of Ipswich over a 20-year horizon to accommodate this population growth, as well as existing key industries such as defence, manufacturing, transport and logistics, and future diversification into industry sectors such as:

- knowledge, education and creative industries;
- food production and agribusiness;
- energy and resources;
- tourism;
- property and construction;
- hospitality and retail uses;
- health and medical; and
- community services.

The growth and development of these industries, as well as housing, services and infrastructure required by a growing population, will rely heavily on the construction materials industry. Therefore, the Draft Planning Scheme should recognise and provide for the construction materials industries that will be critical to accommodating and achieving this growth, including Concrete Batching Plants and Extractive Industries.

#### **Specific comments on the draft Planning Scheme**

##### **No 'High Impact Industry' zones – Concrete Batch Plants**

Industrial land availability and affordability is 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, infrastructure and services to facilitate practical access and use for industrial needs. Pre-mixed concrete has some specific properties which make the location of concrete-batching facilities critical. As such, it is important that the location of concrete plants is not compromised by being too far away from its end use.

The draft Planning Scheme does not provide any land zoned for development of 'High Impact Industry', the definition of which includes Concrete Batching Plants. In fact, a search of a number of existing Concrete Batching Plants within the City of Ipswich identified that the land on which these established High Impact Industry uses are located, are zoned Low or Medium Impact Industry under the Draft Planning Scheme. While this zoning may be consistent with the current zoning, Council has missed an opportunity to reflect long-standing, established uses and identify strategically suitable locations to accommodate such uses and meet the construction material demands for the city's future growth.

Each zone identified in the Draft Planning Scheme specifies 'Expectations for Uses' within the respective zone. High Impact Industry is not identified as 'development that is expected in' any of the City of Ipswich's industry-related zones:

- 'Industry investigation';
- 'Low Impact Industry'; or
- 'Medium Impact Industry'.

While High Impact Industry is not prohibited in any of these industry-related zones, it is specifically identified as 'development that is not expected and is unlikely to be approved' in the Low Impact Industry Zone, and both the Industry investigation and Medium Impact Industry Zones are silent on this use all together.

Further, High Impact Industry is not identified in the Categorisation Tables, which detail the assessment level (i.e. accepted, code, impact), in any of these 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' - in each of these zones the use is identified as Impact Assessable, however it is expected that High Impact Industry would generally not be considered suitable in such zones.

Again, while not prohibited (its absence from the tables makes it automatically Impact Assessable), 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.

Despite High Impact Industry (e.g. Concrete Batching Plant) not being 'prohibited' under the Draft Planning Scheme, the above indicates that Ipswich City Council does not support essential High Impact Industries, such as Concrete Batch Plants, within its local government area.

### **No Extractive Industry Zone**

The Draft 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 (KRAs), and as required under the [Queensland Planning Provisions](#).

The two (2) current KRAs within the Ipswich City Council local government area, despite both being established quarries, are instead zoned 'Rural'. The Draft Planning Scheme is supported in that:

- the two (2) existing KRAs are recognised through the Extractive Resources Overlay;
- the purpose of the Extractive Resources Overlay Code includes the protection of extractive resource areas and transport routes from incompatible development;
- the Rural Zone Code's overall outcomes include the protection of 'identified extractive resources of regional significance' (interpreted to be KRAs).

However, 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, meaning the further development of existing Extractive Industry uses within KRAs or the establishment of new extractive activities outside existing KRAs/the Extractive Resources overlay could be limited.

### **5.9.12 – Extractive Resources Overlay**

Under the Categories of Development and Assessment for the Extractive Resources Overlay (Table 5.9.12), all material change of use is assessable against the Extractive Resource Overlay Code. CCAA is supportive of this, as it will ensure that incompatible development is not established in quarry buffers.

### **Part 7 Rural Zone Code**

#### **Part 7.6.1.2 – Purpose and Overall Outcomes**

Part 7.6.1.2 (3) (p) of the Rural Zone Code provides:

***p. identified extractive resources of regional significance are protected, enabling the continuation of current and future operations.***

CCAA is supportive of this statement, however, it should also be extended to regional and local extractive resources.

#### **Part 7.6.1.3 – Expectations for Uses in the Rural Zone**

Extractive industry should be included as an expected land use under 7.6.1.3

### **8.2.12 – Extractive Resources Overlay Code**

Extractive industry in an Extractive Industry Overlay or Extractive Industry Zone should be code assessable because quarries are planned for these areas.

### **CCAA Recommendations**

In order to ensure the new City of Ipswich Planning Scheme supports the construction materials industry that is so critical to its future growth, and that clarity and certainty is provided to both the community and industry, it is strongly recommended that Council:

1. Reflect existing High Impact Industry uses by amending the land zoning to 'High Impact Industry' and including a High Impact Industry Code that reflects the importance of these industries in the Draft Planning Scheme;
2. Identify High Impact Industry as a 'development that is expected' in both the (newly added) High Impact Industry Zone and the Medium Impact Industry Zone (where appropriate, as it is noted that assessment benchmarks would need to be met);
3. Provide for High Impact Industry to be 'Accepted (if in an existing building)' or 'Code Assessable' development in the High Impact Industry Zone (as is the case with other levels of industry in their respective industry zones);
4. Reflect existing Extractive Industry uses / KRAS by amending the land zoning to 'Extractive Industry' and including an Extractive Industry Code that reflects the importance of these industries in the Draft Planning Scheme;
5. Identify Extractive Industry as a 'development that is expected' in the (newly added) Extractive Industry Zone; and
6. Provide for Extractive Industry to be 'Accepted' or 'Code Assessable' development in the Extractive Industry Zone (as is the case with other levels of industry in their respective industry zones).

Thank you for the opportunity to provide feedback on the draft Ipswich Plan 2024. If you would like to discuss the feedback raised further, I can be contacted on 0417 738 268 or [Cassandra.koutouridis@cca.com.au](mailto:Cassandra.koutouridis@cca.com.au)

Yours sincerely



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<sup>1</sup> [New Ipswich Planning Scheme | Shape Your Ipswich](#)