

12 February 2021

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

Via: <https://consultation.dph.wa.gov.au/regional-planning/draft-bunbury-geographe-sub-regional-strategy/>

SUBJECT: DRAFT BUNBURY-GEOGRAPHE SUB-REGIONAL PLANNING STRATEGY

Cement Concrete & Aggregates Australia (CCA) welcomes the opportunity to provide a submission to the Department of Planning Lands & Heritage on the Draft Bunbury-Geographe Sub-Regional Planning Strategy.

CCA 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. CCA Western Australia's members are outlined in Appendix 1.

CCA supports strategic land use planning that considers basic raw material values to provide increased certainty for proponents and the community and supports an efficient heavy construction materials supply chain that provides the engine to build Western Australia's post COVID economy and create jobs.

As an initial over riding comment, strategic land use planning strategies such as this should not be promoting one type of building construction, such as light weight construction, over another. Market forces should be left to drive commercial outcomes and public money should not be spent supporting and encouraging specific building products when there is no underlying resource limitation to support this policy.

CCA makes the following comments on the draft Strategy:

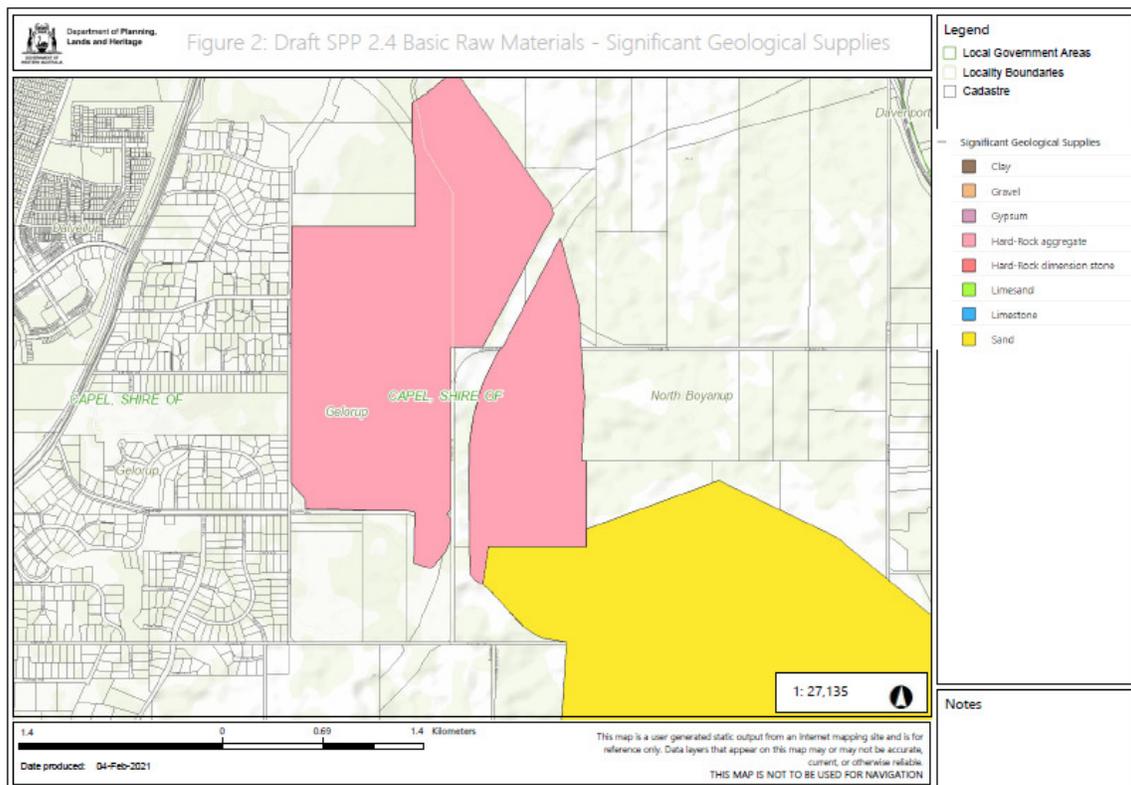
Section 17.6 Basic Raw Materials

- CCA **recommends** that this Strategy should align with and refer to the *State Planning Policy 2.4 Basic Raw Materials*.
- CCA notes that the 2012 Department of Planning and WAPC report on *Basic Raw Materials Demand Study for the Bunbury and Busselton Region* identified several regionally significant deposits and recommended these are protected from potential incompatible land uses that would restrict future extraction of these resources.
- This is supported by the 2018 draft *State Planning Policy 2.4 Basic Raw Materials Guidelines* that outlines the need to protect strategic sources of limestone, lime sand and clay in the Bunbury region. Given the limited sites that supply high quality hard rock aggregates and stone in the region that are close to market, these sites should also be protected.
- The Strategy does not make any recommendation on protecting strategic basic raw material resources, in contradiction to the recommendations of the *Basic Raw Materials Demand*

Study for the Bunbury and Busselton Region report and in contradiction to the recommendation of the State Planning Policy 2.4 Basic Raw Materials Guidelines.

- CCAA **recommends** that the *Greater Bunbury Region Scheme Strategic Minerals and Basic Raw Materials Resource Policy*, October 2018, (2018 BRM Policy) published by DPLH & WAPC is incorporated into this Strategy. This is absolutely essential.
- The principal purpose of the 2018 BRM Policy is to ensure long-term security of access for basic raw materials through appropriate land use planning and control of development.
- CCAA **recommends** that this principal purpose should be clearly stated in the Strategy through identifying and protecting basic raw material significant geological supplies, as outlined in Clauses 5.1 – 5.14 and Map 10 of the 2018 BRM Policy.
- These clauses state that strategic resources, and an indicative separation distance or buffer should be identified in sub-regional planning strategies. This has clearly not been done in this Strategy.
- CCAA **recommends** that buffer areas are included in Map 10 of the Strategy.
- CCAA **recommends** that all the hard rock quarries identified in the SPP 2.4 mapping in the Strategy area, including the vital, strategic hard rock resources at Gelorup, south of Bunbury (see Figure 1), and Strategic Resource identified in Map 1 of the 2018 BRM Policy are included in Map 10 of the Strategy and protected as proposed in the 2018 BRM Policy. These resources are essential for the continued economic supply of concrete and road making materials for the region.

Figure 1 - Strategic hard rock resources at Gelorup



- CCAA notes that many existing quarries are not within the "significant geological supply" areas and have long term approvals/resources that need to be identified so they can be considered in future planning and appropriately protected.
- CCAA **recommends** that the list of existing quarries in Table 9 of the 2012 Bunbury BRM Demand and Supply Study is updated with the assessment of existing and potential BRM extraction sites in the Bunbury region completed in 2018 by Main Roads WA for the Bunbury Ring Road project.
- CCAA **recommends** a new Strategic Direction is included in the Strategy that will protect the strategic basic raw material resources in the region from potential incompatible land uses that would restrict future extraction of these vital resources.

Section 17.7 Lightweight Construction

- CCAA **recommends** that Strategic Direction 16 - *Encourage and incentivise lightweight construction methods to reduce demand for sand fill*, is removed.
- This Strategic Direction directly contradicts the Strategy's principle to provide diverse and affordable housing and support population and jobs growth.
- The 2012 Supply & Demand Study indicated that the potential supply of sand to be used in fill was ten times the predicted demand out to 2030.
- This does not support the Strategy's argument that lightweight construction is needed to reduce demand for sand as fill.
- The Strategy does not provide any data that supports the statement that substituting timber is a more sustainable solution than the traditional brick on concrete slab.
- CCAA supports an open and competitive market for building and construction products, a market without Government policy that is anti-competitive, preferencing one group of products over another.
- Concrete is the most widely used construction material in the world due to its durability, strength, resilience, sustainability, thermal efficiency, speed of construction, design versatility and cost effectiveness.
- Western Australia's building and construction industry is much better placed than Government to determine the most appropriate form of construction for a particular building project, dependent on the site's unique characteristics.
- A Government policy promoting the use of light-weight materials has the potential to distort the market by limiting choice to the customer, limiting competition, limiting innovation, limiting the development of new housing areas, and encouraging the use of products that may not be fit for purpose given the sites characteristics.
- Any increase in the cost of these basic raw materials will flow through to every part of the construction industry, decreasing housing affordability and increasing cost of Government infrastructure.

- Concrete has significant sustainability credentials. These are outlined in the following documents:
 - Building Better Homes with Concrete¹
 - Concrete the Lifeblood of Building²
 - Case Study President Avenue Apartments³
 - CCAA Briefing 11 – Sustainable Concrete Materials⁴
- Concrete’s sustainability credentials are further improved as it is increasingly important in the circular economy in Western Australia. CCAA promotes the use of recycled basic raw materials where appropriate from construction and demolition waste. This material can now be used in road construction under the Government’s Road to Reuse Program⁵.
- Given the recent fires around Perth, the sustainability aspects of building products should also consider fire safety, especially in fire prone regional areas such Bunbury- Geographe. Concrete buildings are highly fire resistant⁶.

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.

The provision of affordable heavy construction materials helps to facilitate the delivery of affordable infrastructure, contributing to the completion of Western Australia’s infrastructure projects within budget.

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 post COVID 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

¹ https://www.ccaa.com.au/imis_prod/documents/Library%20Documents/CCAA_Detached/BROCHURE-Detached_Housing_LR.pdf

² https://view.publitas.com/p222-10238/concrete_lifeblood_of_building_cbwl_branding_final/page/1

³ https://www.ccaa.com.au/imis_prod/documents/CONCRETE_President_Apartments_Case_Study_Final.pdf

⁴ https://www.ccaa.com.au/imis_prod/documents/Library%20Documents/CCAA%20Technical%20Publications/CCAA%20Briefings/Breifing%2011%20Materials_WEB.pdf

⁵ <https://www.wasteauthority.wa.gov.au/programs/view/roads-to-reuse>

⁶ https://www.ccaa.com.au/imis_prod/documents/Library%20Documents/CCAA%20Technical%20Publications/CCAA%20Guides/CCAAGUIDE2010-T61-FireSafety.pdf

APPENDIX 1

CEMENT CONCRETE & AGGREGATES AUSTRALIA

MEMBERSHIP

FOUNDATION MEMBERS

 <p>ADBRI Adbri Limited</p>	 <p>Boral Australia</p>	 <p>Cement Australia Pty Ltd</p>
 <p>Hanson Australia Pty Ltd</p>	 <p>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>	
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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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