

17<sup>th</sup> July 2009

Growth Areas Authority  
Level 6, 35 Spring Street  
**MELBOURNE VIC 3000**

Dear Sir/Madam

## **URBAN GROWTH BOUNDARY REVIEW**

The Construction Material Processors Association (CMPA) welcomes the opportunity to provide input into the review of the Urban Growth Boundary.

### **Organisation Overview**

The Construction Material Processors Association (CMPA) membership comprises a broad spectrum of small to medium enterprises (SME) located throughout Victoria. Our members are involved in construction material processing businesses, principally extracting, processing or otherwise working in quarries (hard rock, gravel, sand, masonry, clay, lime, soil and gypsum), and the expanding construction materials recycling business, as well as consultants and suppliers to the industry.

These businesses are the driving force behind Victoria's highly competitive extractive industries and they process almost half of the state's tonnage output, which in 2007/08 totalled over 52 million tonnes valued at \$740 million, excluding recycled materials.

This submission reiterates the points made in our initial submission in February 2009 and in addition makes the following key points:

- Existing quarries and their identified extensions and relevant buffers should not be zoned for urban development.
- Potential quarry sites where a resource has been drilled should also not be zoned for urban development.
- Proper evaluation of key strategic extractive industry resources as identified in the Extractive Industry Interest Areas should be conducted by Government to ensure quality resources are not sterilised.
- Maintaining supply of construction material from quarries close to market lowers the cost of these materials, contributing to the cost effective economic and social development of the State.

### **Existing quarries should not be zoned for urban development**

The CMPA welcomes the Growth Areas Authority (GAA) statement that existing quarries and their buffers are unsuitable for development, but urge that a firm commitment be made that these sites will not be zoned for urban development. It is also important for the GAA to not zone for urban development extensions to these existing quarries where there is an identified resource. Without such protection, an unnecessary restriction is placed on these legitimate quarrying businesses. Site specific quarry extensions should be considered by the planning and environmental regulatory authorities at the time of the proposal rather than be restricted at the strategic level now.

### **Potential quarry sites should not be zoned for urban development**

Potential quarry sites where a resource has been identified by drilling should also not be zoned for urban development. Such a resource may have been identified by individual companies at considerable cost and be confidential and commercially sensitive information. CMPA encourages the GAA to strategically consider the value of these resources so that they are not sterilised from use by future generations.

### **Strategic assessment of Extractive Industry Interest Areas**

The CMPA notes that urban development is scheduled to occur within large areas of Extractive Industry Interest Areas (EIAs) in the west around Rockbank, in the north around Donnybrook and Beveridge and in the east near Clyde. We understand that EIAs do not provide statutory protection for such resources or that extractive industry would be confined to these areas, however the CMPA is highly concerned that these interest areas may be reduced as a result of this review.

Any such changes which impact upon EIAs should only be finalised after detailed geological assessments have been made by Government, and the resource assessed considering the benefit it does, or can, provide to the community.

The collection of information on construction material resources within the EIA must take into account the quality (i.e. grades and end uses of materials), quantity (i.e. approved commercially winnable materials) and markets for the resource. Each area and indeed each Work Authority needs to be assessed on its individual market areas. This will ensure that we will not be left with inaccurate assumptions as to the resources in specific areas.

### **Provision of low cost construction materials to the market**

A key issue for Government in considering the location of quarries is the issue of transport costs of material to market. Hard rock and sand are significant cost components of concrete and roads. If quarries are forced to move further away from their market due to urban encroachment, increases in transport costs associated with longer haul distances from quarry to market will lead to significantly increased cost of infrastructure projects. In addition, there is greater environmental impact (greenhouse gases, air & noise pollution) and social costs (road maintenance, road accidents) from transporting materials a longer distance.

I would be more than happy to expand on any of these issues in person to the Review team if required

Yours sincerely



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