

19 November 2024

Ben Nicholson
Department of Transport and Planning

Via email: ben.nicholson@transport.vic.gov.au

Dear Ben

STRATEGIC EXTRACTIVE RESOURCE AREAS (SERAS) IN LANG LANG, OAKLANDS JUNCTION AND TRAFALGAR

Thank you for the opportunity to comment on the proposed Strategic Extractive Resource Areas (SERAs) in Lang Lang (Shire of Cardinia), Oaklands Junction (City of Hume) and Trafalgar (Shire of Baw Baw).

Submission

- A highly visible policy statement needs to be made by the Victorian Government that supports the current (albeit lengthy, costly and uncertain) opportunities for establishing new quarries or expanding existing quarries outside of the proposed SERAs.
- A highly visible policy statement needs to be made by the Victorian Government supporting the continued extraction of construction materials at existing quarries outside any SERAs.
- SERAs should be rolled out for regional centres and include more small to medium quarries (which produce close to half the annual production of construction material requirements for Victoria) as soon as possible.
- Consideration should be given to SERAs automatically becoming established for all existing quarries and when a work authority application is submitted for a greenfield site.
- The proposed SERAs in Lang Lang (Shire of Cardinia), Oaklands Junction (City of Hume) and Trafalgar (Shire of Baw Baw) are supported.

Summary

In summary, the proposed SERAs are supported providing the disadvantages to all current quarry industry operators and green field applications outside of the proposed SERAs are negated.

At the very least, a highly visible policy statement from the Victorian Government that supports and encourages extraction from existing quarries (including the opportunity for variations to work plans) and the establishment of greenfield or brownfield sites outside of the proposed SERAs.

Further information

Advantages of SERAs for the extractive industry

- Increased policy protection and streamline development approvals with certainty for extractive industry already operating within the proposed SERAs.
- Future areas within the SERA removes the requirement to justify if extractive industry is an appropriate land use thereby removing tension between industry, State government, local government, and local residents.
- Greater certainty with more consistent and uniform planning requirements and approaches for extractive resources.
- Placing greater weight on extractive resources and provide protection of existing and future resource sterilisation of extractive industry from competing land uses by discouraging incompatible uses in buffer areas.
- Maintaining existing approvals and rights and not negatively impacting approvals processes currently being sought.

Disadvantages of SERAs for the extractive industry

- Green or Brown field site quarry applications will be disadvantaged (as is currently occurring) if situated outside a SERA. Note the comments in the Sentinel Times 3 October 2024 <https://www.sgst.com.au/news/state-seeks-right-balance-on-sand-extraction> stating that sand extraction will only occur within the proposed SERAs. New quarries/variations to quarries will not be allowed outside the SERA in Lang Lang. The sand at Lang Lang is fine sand, coarse sand from outside the SERA will be required to meet concrete specifications.
- Current/proposed SERAs provide an uneven playing field in terms of new Work Authority applications and potential costs given the removal of third-party appeal rights.
- Existing quarries may have difficulty in expanding their quarries if situated outside a current/proposed SERA.
- Quarries undertaking a variation or for a new application in the current/proposed SERAs will have a skewed market advantage if third party appeal rights are removed within the SERA boundary.
- Only quarries in the SERAs will directly benefit from Victorian Government funding the SERA implementation.
- The time taken to implement SERAs across all current work authorities using the processes undertaken would be lengthy and may occur too late for quarries that have the potential to being impacted by encroachment or their diminishing

resources and further delays could stifle opportunities to apply for variations or extensions.

I would be pleased to discuss these matters with you. Please contact me on 0434 692 618 or via email at elizabeth.gibson@cmpavic.asn.au in respect of any matter.

Yours sincerely



Dr Elizabeth Gibson
General Manager

About CMPA

CMPA is the premier representative body for the Victorian extractive resources industry. It represents a broad spectrum of those involved in construction material processing including construction and demolition waste recycling businesses and has a membership base consisting of over 220 quarries across the industry. Together, these members employ approximately 2000 Victorians which underpins the construction industry of almost 240,000 employees (<https://liveinmelbourne.vic.gov.au/connect/victorian-industries/transport-defence-and-construction>).

CMPA members are typically small to medium sized family, and private businesses, local government, utility providers and national companies. Many are regionally based employers and service local construction, infrastructure, and road maintenance needs. The extractives sector is a key pillar within the construction industry underpinning the growth and economic development of Victoria through supply of the construction materials.

In 2022/23, the sector supplied approximately 72 million tonnes of construction materials and 7 million tonnes of recycled construction and demolition waste (25% of total freight movement in Victoria) to the market, at a value of approximately \$1.4 billion directly supporting Victoria's \$80 billion Big Build (<https://bigbuild.vic.gov.au/about>) and the estimated 1.6 million new homes required by 2050 (<https://earthresources.vic.gov.au/geology-exploration/industry-investment/joint-ministerial-statement-on-extractive-resources>). Small to medium quarries account for approximately half of this production and is submitted to be a vital industry supporting the ongoing economic prosperity of Victorians. An additional 6.5 million tonnes of recycled construction and demolition waste was also produced.

The CMPA supports the principle of responsible, balanced legislation that is in the best interests of the State of Victoria and Australia.