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Bioregional Planning Team
Department of the Environment, Tourism, Science and Innovation
Queensland Government

Via: bioregional.planning@detsi.qld.gov.au

Draft Bioregional Guidance Plans (Brigalow Belt North and Gulf Plains)

Dear Bioregional Planning Team

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to comment on the Draft Bioregional Planning Guidance Plans.

CCAA is the voice of Australia's cement, concrete and extractive industry. In Queensland, our members supply the heavy construction materials that underpin housing, transport infrastructure, renewable energy, water infrastructure, environmental restoration and economic development.

The Draft Guidance Plans seek to deliver strategic, landscape-scale environmental planning. The effectiveness of this approach will however depend on how future statutory frameworks are implemented.

CCAA's principal interest is ensuring that future planning frameworks recognise that environmental protection, housing, infrastructure delivery, renewable energy and resource security are interconnected public policy objectives that should be planned together rather than in isolation.

This submission proposes that future bioregional planning frameworks should not only identify environmental values and conservation priorities, but also recognise the **Strategic Supporting Resources** required to deliver the outcomes governments are seeking to achieve.

This submission should be read together with CCAA's previous [submissions](#) on the Commonwealth EPBC reforms, including the National Environmental Standards for MNES, Environmental Offsets, Community Engagement and Data and Information, and the EPBC subordinate legislation package. Across those submissions, CCAA has consistently supported stronger environmental outcomes delivered through clearer, proportionate and streamlined approval processes, with appropriate recognition of geographically constrained, long-life and staged quarry developments and the avoidance of Commonwealth–State duplication.

The Submission recommends that current and future bioregional planning frameworks:

1. **Inform rather than predetermine development decisions**, ensuring strategic planning complements rather than replaces project-specific environmental assessment.
2. **Recognise Strategic Supporting Resources alongside environmental values** to integrate environmental protection with Queensland's long-term housing, infrastructure, renewable energy and economic development objectives.

3. **Incorporate resource-safeguarding principles**, including strategic resource significance, viable transport distances, buffers, alternative supply opportunities, transport efficiency and sequential land use.
4. **Deliver a genuine planning dividend**, including reduced duplication, more targeted information requests, binding service standards and more efficient and proportionate assessment pathways.
5. **Improve the quality, accessibility and transparency of strategic planning information**, while ensuring contemporary site-specific evidence is properly considered and can correct or qualify regional datasets.
6. **Treat cumulative-impact assessments and impact-threshold categories as strategic guidance**, supported by transparent methodologies, fair attribution of responsibility and project-specific assessment—not as automatic go/no-go or refusal criteria.
7. **Recognise progressive quarry rehabilitation and post-extraction land uses** as mitigation, repair, restoration or offset outcomes where the applicable additionality, durability and verification requirements are met.
8. **Align bioregional planning with Commonwealth–Queensland bilateral and accredited pathways**, supporting “assess once, approve once” outcomes and preventing duplicated surveys, engagement, offsetting, conditions and reporting.
9. **Provide transitional certainty and transparent review arrangements** for existing lawful operations, staged projects and approvals already under assessment, with formal industry involvement in monitoring and material plan updates.

CCAA appreciates the opportunity to contribute to this important process and looks forward to continuing to work constructively with the Queensland and Commonwealth Governments as bioregional planning frameworks continue to evolve.

Thank you for considering our submission (overleaf).

Should you wish to discuss any aspect of this submission, please contact CCAA's Industry Policy Director, Mr David Rynne, on . or via david.rynn@ccaa.com.au.

Yours sincerely

MICHAEL KILGARIFF
Chief Executive Officer

About CCAA

Cement Concrete & Aggregates Australia is the voice of the heavy construction materials industry in Australia.

CCAA members produce the majority of Australia's cement, concrete, and aggregates, which are crucial to Australia's building and construction sectors. These materials support the development of our nation's transport, energy, water, housing, defence, and social infrastructure.

Nationally, the [industry contributes](#) \$20.7 billion to GDP and supports 112,970 jobs across Australia. It generates \$6.8 billion in direct value added and underpins activity across the broader economy through extensive supply chain and induced effects.

The industry contributes \$3.35 billion to Queensland's Gross State Product and supports 14,858 jobs.

ATTACHMENT 1

CCAA Submission on the Draft Brigalow Belt North and Gulf Plains Bioregional Guidance Plans

Executive Summary

CCAA recognises the important role that strategic planning can play in improving understanding of environmental values, cumulative impacts and landscape-scale environmental management.

The Draft Guidance Plans provide a potential approach for future bioregional planning. However, the effectiveness of future statutory planning frameworks will ultimately depend on whether they recognise the full range of public policy objectives governments are seeking to achieve.

Queensland faces unprecedented demand for housing, renewable energy, transmission infrastructure, water infrastructure, transport infrastructure and environmental restoration. These objectives rely on timely access to construction materials.

Future bioregional planning should not only identify environmental values requiring protection but also recognise the Strategic Supporting Resources required to deliver these broader public policy outcomes.

The CCAA's submission makes nine recommendations which can be summarised as:

1. **Inform, don't predetermine:** Bioregional plans should guide decisions, not operate as de facto approval bans or zoning maps.
2. **Recognise construction materials:** Identify strategically important quarry resources needed for housing, infrastructure and renewable energy.
3. **Safeguard resources:** Protect resource access, buffers, transport routes and future supply options from unnecessary sterilisation.
4. **Deliver a planning dividend:** Reduce duplicated studies, information requests and approval delays.
5. **Improve data quality:** Use current, transparent data while properly considering site-specific evidence.
6. **Keep thresholds advisory:** Cumulative-impact and risk categories should not automatically determine project outcomes.
7. **Recognise rehabilitation:** Credit progressive quarry rehabilitation and post-extraction environmental outcomes where measurable and secure.
8. **Align State and Commonwealth processes:** Support "assess once, approve once" and avoid duplicate offsets, consultation and reporting.
9. **Protect existing projects:** Provide transitional certainty and consult industry on future plan updates.

1. Introduction

Cement Concrete & Aggregates Australia is the voice of the heavy construction materials industry in Australia.

The industry supplies the construction materials required to deliver housing, renewable energy projects, electricity transmission infrastructure, transport infrastructure, water infrastructure and community facilities.

Unlike many forms of development, extractive resources are location constrained. Quarry resources occur where geology has created them and cannot be relocated to alternative sites.

Strategic planning decisions therefore have long-term implications for resource availability, housing affordability, infrastructure delivery and economic productivity.

2. Strategic Planning Must Balance Environmental Protection and Resource Security

CCAA recognises the intention of the Draft Guidance Plans is to improve strategic understanding of environmental values, cumulative impacts and opportunities to better inform future development decisions.

However, environmental protection represents only one of several interconnected public policy priorities facing Queensland.

Governments are simultaneously seeking to accelerate housing delivery, renewable energy deployment, electricity transmission, transport infrastructure, water security, flood resilience and environmental restoration.

Each of these priorities depends on reliable access to heavy construction materials.

Future bioregional planning frameworks should therefore recognise that environmental protection and resource security are complementary—not competing—public policy objectives.

The purpose of strategic planning should be to optimise outcomes across these objectives rather than maximise one objective in isolation.

3. How the Draft Guidance Plans are Intended to Operate

The Draft Guidance Plans and associated Interactive Tool introduce several concepts intended to assist proponents and regulators to understand environmental values and cumulative impacts at a landscape scale.

The Spatial Conservation Analysis identifies:

Important Conservation Areas

Areas that make a significant contribution to biodiversity conservation outcomes and where avoidance of impacts may be particularly important.

Representative Protection Areas

Areas that contribute to achieving a comprehensive, adequate and representative protected area system.

High Restoration Potential Areas

Areas where restoration activities may provide significant biodiversity benefits and contribute to broader conservation objectives.

Together, these layers assist proponents to identify environmental risks early and refine project design.

Scope and status of the Guidance Plans

CCAA acknowledges that the Draft Guidance Plans are described as non-regulatory, do not establish regulatory zones and are not intended to replace project-specific environmental investigations. However, EPBC decision-makers will be required to have regard to an approved plan when making relevant project and landscape-scale decisions. The practical influence of the plans may therefore extend well beyond their stated advisory status.

The Brigalow Belt North plan is primarily focused on wind farm development. Its impact pathways, mitigation assessments and strategic advice should not be applied mechanically to quarrying or other development classes with materially different operational characteristics, environmental impacts and mitigation opportunities. Where the plan is used for another industry, its findings should be tested against current, industry-specific and site-specific evidence.

Cumulative Impact Assessment

The Guidance Plans place considerable emphasis on cumulative impact assessment.

Rather than considering projects in isolation, the framework seeks to understand how multiple activities and environmental pressures interact across a landscape.

Importantly, the cumulative impact framework also provides information on likely impact pathways, mitigation opportunities and management responses.

CCAA supports the increased emphasis on strategic cumulative impact assessment.

However, cumulative-impact assessment must distinguish clearly between:

- the impacts reasonably attributable to an individual project;
- the impacts of other current or proposed developments;
- legacy impacts from earlier activities, and
- broader regional pressures such as invasive species, grazing, fire regimes and climate change.

An individual proponent should not be required to remedy regional environmental decline that is not reasonably attributable to its project.

The plan should identify the respective roles of proponents, governments, landholders and other sectors in addressing cumulative pressures. Any project-level requirement should be proportionate to the project's actual contribution and supported by transparent evidence and methodology.

CCAA recommends that the final plans provide clear rules for establishing the regional baseline, attributing impacts and determining when landscape-scale or government-led conservation responses are more appropriate than project-specific conditions.

Social, Cultural and Economic Values

The Guidance Plans also recognise, positively, the importance of social, cultural and economic considerations in strategic planning and encourage proponents to consider opportunities to minimise trade-offs and deliver broader community benefits.

4. Bioregional Planning Should Inform - Not Predetermine - Development

CCAA understands how strategic environmental information could improve project planning and identify opportunities to avoid or minimise environmental impacts at an early stage.

However, strategic planning tools should inform future decision-making rather than become de facto "go/no-go" maps.

Regional planning cannot replace project-specific environmental investigations, detailed impact assessment, avoidance and mitigation measures, offsets, public interest balancing or consideration of strategic resource significance.

These matters should continue to be assessed through established statutory planning and environmental approval processes.

Similarly, strategic mapping should not be interpreted as removing the need for detailed field investigations, recognising that environmental values, resource quality and project design opportunities can only be fully understood through project-specific assessment.

The mitigation hierarchy should also be applied in a way that recognises the geographical constraints of extractive industries. Where a proponent demonstrates that no reasonable alternative resource exists within a practical and economically viable transport radius to serve the intended market, relocating the project should not be treated as a realistic avoidance option.

In those circumstances, assessment should focus on avoiding impacts within the available resource area where practicable, minimising the project footprint, applying effective operational controls, undertaking progressive rehabilitation and addressing any remaining residual impacts through appropriate offsets or restoration measures.

This does not remove the obligation to avoid and minimise impacts. It ensures that the obligation is applied to genuine and technically feasible alternatives rather than hypothetical locations where the required geological resource does not exist.

Future statutory frameworks should therefore ensure bioregional planning informs assessment without predetermining development outcomes.

5. Impact thresholds must remain strategic guidance

CCAA recognises that the impact-threshold categories may assist proponents in identifying environmental risk early. However, the E2–E4+ categories should remain strategic indicators and must not operate as presumptive refusal criteria or substitute for the statutory assessment of an individual project.

Before these categories influence project decisions, the final plan and supporting guidance should provide:

- objective and transparent criteria for assigning protected matters to each category;
- the underlying data, assumptions, confidence levels and restoration-feasibility assessments;
- clear explanations of how “near zero”, “as low as possible” and “irreplaceable” are to be applied;
- a process for considering contemporary site-specific evidence that differs from the regional assessment;
- worked examples showing when impacts remain capable of mitigation or offset; and
- a mechanism for reviewing and changing a category as new scientific information becomes available.

Consistent with CCAA’s [MNES Submission](#), “irreplaceable” should be treated as a high evidentiary threshold. It should not create a general presumption that listed habitat or ecological communities cannot be restored or recreated where credible scientific evidence demonstrates otherwise.

6. Strategic Supporting Resources

Queensland is entering a period of unprecedented infrastructure and housing delivery.

Over the coming decades, governments are seeking to deliver new housing, renewable energy generation and storage, electricity transmission infrastructure, transport infrastructure, water security projects, flood resilience works and environmental restoration programs.

Each of these public policy objectives depends upon reliable, affordable and locally available supplies of heavy construction materials.

While governments routinely identify future transport corridors, renewable energy zones, housing growth areas and conservation priorities through strategic planning processes, comparatively little strategic attention is given to the construction materials required to deliver these outcomes.

CCAA submits that future bioregional planning should explicitly recognise Strategic Supporting Resources.

Strategic Supporting Resources are those natural resources, including construction material deposits, that are essential to enabling broader public policy outcomes. They are not an end in themselves; rather, they underpin the delivery of housing, infrastructure, renewable energy, environmental restoration and economic development.

Recognising Strategic Supporting Resources within future bioregional planning would enable governments to consider environmental values and long-term resource security together, rather than addressing these issues separately through individual project assessments.

Importantly, recognition of Strategic Supporting Resources does not imply that development should automatically proceed. Rather, it ensures that the long-term public interest associated with maintaining access to strategically important resources is identified and considered alongside environmental values during regional planning and subsequent statutory assessment.

Future planning frameworks should therefore seek to identify:

- strategically significant construction material resources;
- buffer zones needed to access these resources to ensure practical transport and logistics and other operating considerations;
- existing and future areas of demand;
- alternative supply opportunities;
- opportunities for sequential land use and post-extraction environmental outcomes, and
- the cumulative implications of progressively sterilising strategically important resources.

Doing so would assist governments to better integrate environmental protection with long-term infrastructure planning and resource security.

7. Progressive rehabilitation and post-extraction outcomes

Bioregional planning should recognise that long-life quarry developments generally proceed through stages and can deliver progressive rehabilitation and post-extraction environmental outcomes over the operational life of a project. These outcomes may include revegetation, habitat restoration, landform stabilisation, water features, ecological corridors and long-term conservation land uses.

Consistent with CCAA's previous EPBC submissions, progressive rehabilitation should be recognised:

- as mitigation or repair where it demonstrably reduces the duration, seriousness or extent of an impact; and
- as a potential restoration or offset outcome where it delivers an additional, measurable, durable and independently verifiable biodiversity improvement.

The plans and Interactive Tool should identify opportunities where staged quarry rehabilitation could contribute to regional restoration priorities.

They should also provide guidance on baselines, timing, additionality, security and verification so rehabilitation outcomes are credited appropriately and are not ignored or counted twice.

8. A Planning Dividend Must Accompany Strategic Planning

One of the principal objectives of bioregional planning is to improve strategic understanding of environmental values before project-specific assessment occurs.

If proponents are expected to utilise this information to influence project selection, design and environmental management, the strategic planning process should also deliver tangible improvements to the efficiency of subsequent assessment and approvals.

Without a corresponding planning dividend, there is a risk that bioregional planning simply becomes an additional layer of process rather than reducing duplication or improving decision-making.

Accordingly, future statutory frameworks should seek to ensure that strategic planning delivers measurable benefits to proponents where projects have appropriately considered bioregional planning outcomes.

These benefits could include:

- greater reliance on strategic environmental studies during project assessment;
- reduced duplication of assessment requirements;
- more targeted information requests based on identified risks;
- greater consistency between Commonwealth and State assessment processes;
- shorter approval timeframes where strategic planning has already resolved regional issues, and
- assessment effort that is proportionate to project risk.

The planning dividend should be delivered through Commonwealth–Queensland bilateral and accredited arrangements wherever possible. Where a project has appropriately used the bioregional plan and has satisfied an equivalent Queensland assessment requirement, proponents should be able to rely on:

- one coordinated set of ecological studies and surveys;
- one community-engagement process;
- one assessment of avoidance, mitigation and rehabilitation;
- one outcomes-equivalent offset package;
- coordinated approval conditions and reporting obligations, and
- clear service standards and assessment timeframes.

Bioregional planning should support an “assess once, approve once” outcome, rather than creating an additional layer between State assessment and Commonwealth approval.

Delivering these outcomes would encourage early engagement with bioregional planning while improving investment certainty and reducing unnecessary regulatory duplication.

9. Environmental Data Quality and Spatial Transparency

The effectiveness and credibility of future bioregional planning frameworks will depend on the quality, currency, transparency and accessibility of the environmental information on which they are based.

CCAA supports the use of strategic environmental information to inform regional planning. However, where bioregional plans are intended to influence future development decisions or identify areas requiring heightened environmental protection, governments should ensure that the underlying datasets are scientifically robust, regularly updated and appropriately validated.

Regional-scale mapping and desktop assessments provide an important strategic planning foundation. However, they should not be treated as a substitute for project-specific investigations when statutory development decisions are being made. Site-specific field investigations remain essential to accurately characterise environmental values, assess potential impacts and identify appropriate avoidance, mitigation and management measures.

The plan itself acknowledges that its cumulative and spatial analyses rely on information of varying confidence, age and spatial specificity and are appropriate for landscape-scale consideration rather than property-level analysis. Regional mapping should therefore not be treated as automatically determinative where contemporary site-specific survey evidence demonstrates different environmental conditions.

Where a proponent submits credible site-specific evidence that differs from the plan or Interactive Tool, the decision-maker should be required to:

- consider that evidence on its merits;
- explain in the statement of reasons how the evidence was treated; and
- initiate correction or qualification of the regional dataset where appropriate.

The Interactive Tool should include version control, dataset dates, confidence ratings, limitations and a clear mechanism allowing proponents, experts and other users to submit corrections or updated information.

CCAA welcomes the development of the Bioregional Planning Interactive Tool and encourages continued investment in improving the accessibility and transparency of spatial planning information. Future iterations of the framework should provide:

- downloadable GIS datasets and shapefiles;
- industry-standard web mapping services;
- clear metadata describing data sources, methodologies and limitations;

- integration with existing planning, environmental and resource mapping systems;
- functionality enabling proponents to assess project footprints, resource areas and cumulative constraints; and
- transparent processes for updating spatial datasets as new information becomes available.

Improving the quality, accessibility and transparency of strategic environmental information will strengthen confidence in bioregional planning, support better project design, improve stakeholder engagement and enable more informed planning and investment decisions.

10. Existing approvals, staged projects and future plan updates

CCAA recommends that the final plans and implementation guidance provide clear transitional protections for:

- existing lawful quarry operations;
- approved but not yet commenced projects;
- projects already referred or under assessment;
- approved staged developments, and
- rehabilitation, offset and management arrangements already secured under State or Commonwealth approvals.

A plan made or updated after a project has been approved or substantially assessed should not automatically reopen settled matters, require a full reassessment or impose new offset or information obligations. Targeted supplementary assessment should only be required where a material project change creates a genuinely new risk to a protected matter.

CCAA also supports the proposed monitoring and review framework, but industry should be formally involved in its operation. The review process should report not only on environmental outcomes but also on whether the plan has:

- reduced assessment duplication;
- reduced information requests and approval timeframes;
- improved Commonwealth–State consistency;
- supported industry certainty, and
- avoided unintended sterilisation of strategically important resources.

Material changes to the plan, impact categories or Interactive Tool should be subject to consultation before they are used in statutory decision-making.

11. Recommendations

CCAA recommends that current and future bioregional planning frameworks:

1. **Inform rather than predetermine development decisions**, ensuring strategic planning complements rather than replaces project-specific environmental assessment.
2. **Recognise Strategic Supporting Resources alongside environmental values** to integrate environmental protection with Queensland's long-term housing, infrastructure, renewable energy and economic development objectives.
3. **Incorporate resource-safeguarding principles**, including strategic resource significance, viable transport distances, buffers, alternative supply opportunities, transport efficiency and sequential land use.
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8. **Align bioregional planning with Commonwealth–Queensland bilateral and accredited pathways**, supporting “assess once, approve once” outcomes and preventing duplicated surveys, engagement, offsetting, conditions and reporting.
9. **Provide transitional certainty and transparent review arrangements** for existing lawful operations, staged projects and approvals already under assessment, with formal industry involvement in monitoring and material plan updates.