CEMENT CONCRETE & AGGREGATES AUSTRALIA

26 October 2026

The Honourable Jarrod Bleijie MP
Deputy Premier, Minister for State Development, Infrastructure and Planning
and Minister for Industrial Relations
C/- Planning Policy team
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Dear Deputy Premier

Submission on the draft State Planning Policy 2026

Cement Concrete & Aggregates Australia (CCAA) welcomes the draft State Planning Policy 2026 (draft SPP) and its stronger recognition of Key Resource Areas (KRAs) as a State interest. The draft SPP takes important steps towards protecting essential construction material resources from urban encroachment and recognising their role in supporting housing, infrastructure and economic growth. However, protection of resources alone is not enough. Queensland also needs a planning framework that enables identified resources to be responsibly developed and supplied to the market when they are needed.

Oxford Economics' August 2026 report for CCAA (**Attachment 2**) forecasts peak annual hard rock demand in South East Queensland (SEQ) of 28-30 million tonnes between 2027 and 2029, compared with combined approved annual hard rock production limits of approximately 23.8 million tonnes. The potential shortfall is greater still when measured against reported actual production of approximately 20.3 million tonnes annually. Currently approved natural sand reserves in SEQ covered by the analysis are also forecast to be depleted by 2030-31.

CCAA has identified seven quarry proposals in SEQ that have been refused, withdrawn, significantly delayed or subject to prolonged litigation, representing approximately nine million tonnes of potential annual production capacity. Across Queensland, the total rises to nine projects and approximately 12 million tonnes of potential annual capacity. Had these proposals progressed in a timely manner, the industry would be substantially better placed to meet demand, and the supply deficit now confronting SEQ would be considerably less severe.

The emerging supply gap is not a lack of identified resources, but rather, it reflects increasing difficulty in securing approvals for new quarries and expanding existing operations. Unless addressed, this constraint will increase housing and infrastructure costs and make it more difficult to deliver the homes, roads, schools and community facilities required to support Queensland's growth.

The CCAA supports the draft SPP and the following measures:

- Recognition of the economic contribution of extractive resources and their role in supporting Queensland's quality of life (p. 25).
- Recognition that extractive resources, including sand, gravel, rock, clay and soil, are essential for housing delivery, construction and infrastructure development (p. 25).
- Recognition that sand, gravel and rock must be sourced close to markets and protected from incompatible land uses over the long term (p. 25).

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- Recognition that the identification of KRAs reflects their importance as a future resource (p. 25).
- Appropriate zoning of KRAs as the primary protection mechanism, supported by broader protection for extraction and processing activities, as well as identified haul routes (p. 26).
- Introduction of key interactions and strategic aspirations that acknowledge the role of KRAs in strategic planning and what should be considered when balancing competing state interests through plan-making processes.
- Principles supporting timely, evidence-based and proportionate assessment in both plan-making and development assessment processes (pp. 16-17).

Attachment 1 proposes a series of targeted amendments to ensure the draft SPP not only protects KRAs but also supports the timely and responsible supply of construction materials.

These recommendations draw on established planning approaches within Queensland and other Australian jurisdictions.

CCAA's key priorities are:

1. **Ensure resource protection leads to timely resource supply.**
   The planning system should not simply identify and protect KRAs. It should also facilitate responsible new quarries and expansion of existing operations, including streamlined pathways for temporary production increases where impacts can be appropriately managed.
2. **Clearly zone and protect existing and future quarry resources and haul routes.**
   Planning schemes should reflect the intended extractive use of existing and future resource areas within KRAs through Extractive Industry zoning, with complementary provisions protecting separation areas, operations and haul routes from incompatible development and addressing reverse amenity impacts.
3. **Provide clear, consistent and proportionate assessment pathways.** Appropriate extractive industry development within KRAs should be code assessable, supported by a statewide assessment code, model planning provisions and an effective State concurrence referral role.
4. **Plan for the construction materials needed to deliver growth.**
   Planning decisions should consider regional demand, approved reserves, effective production capacity, investment and approval lead times, and transport costs. Supply planning must recognise that quarry resources and markets extend across local government boundaries.

Given the supply pressures already emerging and the investment lead times involved, CCAA seeks immediate progression of practical brownfield measures alongside the longer-term planning reforms. CCAA will actively pursue these measures through the recently established taskforce under the Resources Cabinet Committee.

We welcome further discussion to work collaboratively with the Government on this emerging economic challenge. Please contact Mr David Rynne, QLD State Director on or david.rynne@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 support transport, energy, water, housing, defence and social infrastructure.

Nationally, the industry contributes $20.7 billion to GDP and supports 112,970 jobs. In Queensland it contributes $3.35 billion to Gross State Product and supports 14,858 jobs.

Attachment 1: CCAA submission on the draft State Planning Policy 2026

1. Why these changes matter

Oxford Economics' August 2026 report for CCAA identifies a significant construction materials supply challenge in South East Queensland (SEQ). It forecasts peak annual hard rock demand of 28-30 million tonnes between 2027 and 2029, compared with combined approved annual hard rock production limits of approximately 23.8 million tonnes. The report also forecasts that currently approved natural sand reserves in SEQ covered by the analysis will be depleted by 2030-31. The report is provided separately as **Attachment 2**.

Key findings include:

- **Significant hard rock supply shortfall.** Peak demand in SEQ is forecast at 28–30 million tonnes annually during 2026/27–2028/29. Compared with reported actual production of approximately 20.3 million tonnes annually, this represents a potential supply gap of 7.7–9.7 million tonnes per year. Even if production reaches the report's estimated annual production cap of 23.8 million tonnes, a shortfall of 4.2–6.2 million tonnes annually remains. Closing the gap between existing output and that cap cannot be assumed to occur immediately: some quarries will require investment in plant, workforce and transport capability, alongside workable operating hours and freight access. The immediate supply challenge is therefore potentially substantially larger than the shortfall above the cap alone suggests.
- **Currently approved natural sand reserves covered by the SEQ analysis are forecast to be depleted by 2030-31.** While current production capacity is considered adequate, replacement reserves need to be identified and approved well in advance. This forecast concerns currently approved reserves, rather than exhaustion of all natural sand resources in SEQ.
- **Insufficient approvals to meet future demand.** The supply imbalance has developed over many years due to difficulties securing approvals for new quarries (greenfield developments) and expansions of existing operations (brownfield developments). Despite substantial investment in technically robust development applications, nine quarry proposals across Queensland, including seven in SEQ, representing approximately 12 million tonnes of potential annual production capacity (nine million tonnes in SEQ), have not proceeded or have experienced significant delays.
- **Existing quarries face production constraints.** Many production limits were established decades ago. Increasing approved production levels can be a lengthy, uncertain and costly process, even where there is little or no expansion of the disturbed footprint.
- **Higher freight and construction costs from longer hauls and less productive trucks.** Oxford Economics assessed both quarry location and truck productivity for the approximately 17 million tonnes required for TMR's five-year Sunshine Coast and North Brisbane infrastructure program. Sourcing materials from Toowoomba rather than the Sunshine Coast would add approximately **$305 million in freight costs using PBS Higher Mass Limit vehicles**, rising to **$397 million using conventional trucks**. Toowoomba was an illustrative reference point; the analysis did not establish that sufficient material was available there. The comparison highlights the importance of sourcing materials from the closest suitable quarries and transporting them on the most productive suitable trucks.

- Quarries require significant upfront investment and often operate for several decades. Investors need confidence that strategically identified resources can be developed through a clear, evidence-based and timely approvals pathway.

Recent approval outcomes, prolonged litigation and increasing uncertainty around resource protection have weakened investment confidence and raised concerns about whether the planning framework can deliver the future supply required to support Queensland's growth.

This is no longer simply an industry issue. It is a housing affordability, infrastructure delivery and economic productivity issue. If new supply is not approved in time, Queensland will face higher construction costs, longer transport distances and increasing pressure on the delivery of homes and essential infrastructure.

2. Draft SPP amendments supported by the CCAA

The CCAA supports the draft SPP changes outlined in **Table 1** and recommends they be retained in the final policy. Together, they strengthen protection of Key Resource Areas (KRAs), provide greater certainty for long-term resource planning, and better align the planning system with the State's housing and infrastructure objectives. Construction materials are essential to delivering homes, transport infrastructure and community facilities, and the planning framework must both protect these resources and enable their responsible development.

Table 1: Draft SPP changes that must be retained

Draft SPP change	Reference	Why it helps and why it should be retained in the final SPP
Where a scheme does not appropriately integrate the SPP, the SPP prevails to the extent of any inconsistency. The Minister may call in applications and direct councils.	[p 9]	CCAA supports retaining this provision. With the removal of assessment benchmarks from the draft SPP, explicit reference to the *Planning Regulation 2017* is necessary to clarify how State interests are to be considered in development assessment. Importantly, this provision ensures that where a planning scheme no longer adequately reflects a State interest, the SPP prevails to the extent of any inconsistency. For KRAs, this allows decision-makers to consider changing economic conditions and regional supply needs, rather than relying solely on planning schemes that may not reflect current or future demand for construction materials needed to deliver housing and infrastructure.

Draft SPP change	Reference	Why it helps and why it should be retained in the final SPP
Principles for clear, timely and proportionate assessment, performance outcomes met where the intended outcome is achieved, and evidence-based assessment on individual merits.	[pp 16–17]	CCAA strongly supports the inclusion of principles that promote clear, timely, proportionate and evidence-based assessment. Quarry developments are long-term investments that require substantial capital expenditure and extensive technical assessment. Efficient and merit-based decision-making is critical to maintaining a reliable supply of construction materials and providing industry with confidence to invest in new and expanded operations.
The clear acknowledgement that: • sand, gravel and rock are essential to the construction industry and the delivery of housing and infrastructure; • extractive resource products must be sourced close to markets; and • there is a need to protect extractive resources from encroachment “over many decades”.	[p 25]	CCAA strongly supports these statements. They acknowledge the direct relationship between access to local construction materials and the cost and feasibility of delivering housing and infrastructure. Protecting finite local resources ensures materials can continue to be supplied efficiently and helps avoid unnecessary increases in transport costs, project costs and construction timelines.

Draft SPP change	Reference	Why it helps and why it should be retained in the final SPP
Policy 2(a) "Appropriately zoning land in KRAs" as the first protection measure.	[p 26]	The CCAA supports identifying appropriate zoning as the primary mechanism for protecting KRAs. This approach embeds resource protection at the strategic planning stage, allowing communities, industry and government to clearly understand the long-term role of KRAs before development proposals are lodged. It provides greater certainty and reduces conflict by recognising and protecting important extractive resources through the plan-making process. Section 6.1 sets out CCAA's recommendation for Extractive Industry zoning of existing and future resource areas within KRA
Policy 2(b) The CCAA supports: i. removing reference to "new" from the 2017 wording [p 34]; and ii. replacing "other incompatible land uses" with "other incompatible development" to broaden protection against incompatible development	[p 26; p 34]	These changes broaden protection beyond extraction areas alone and recognise the importance of associated infrastructure, including processing facilities and transport corridors. They also strengthen protection for existing and future quarry operations that are critical to maintaining long-term supply.
Development "on or adjacent" to a transport route is covered.	[p 26; p 34]	The CCAA supports extending protection to development located on or adjacent to identified haul routes. Transport corridors are an essential component of the extractive resource supply chain. Protecting haul routes from incompatible development helps maintain efficient freight movements, reduces transport costs and supports continued access to construction materials.

Draft SPP change	Reference	Why it helps and why it should be retained in the final SPP
The removal of the assessment benchmarks for certain development applications to the extent the SPP has not been identified in a local planning instrument as being appropriately integrated.		CCAA supports removing the assessment benchmarks previously contained in the 2017 SPP provided enforceable replacement provisions in the planning framework ensure extractive resource interests are consistently addressed in development assessment. In practice, these benchmarks only applied where a local planning scheme had not appropriately integrated the State interest. As most planning schemes met this threshold, the benchmarks provided limited practical influence on decision-making. Any removal should be accompanied by stronger, enforceable direction through amendments to the Planning Regulation 2017 and associated assessment provisions, so that protection and responsible development of extractive resources remain effective during development assessment.
The introduction of the Strategic aspirations that set the overall direction for how state interests are to be put into practice, and the land use and development outcomes that Queensland is seeking to achieve.	[pp14-15]	CCAA supports the introduction of Strategic Aspirations that establish a clear statewide direction for implementing State interests. These provisions improve the connection between strategic planning and development assessment, helping ensure that housing delivery, infrastructure provision and resource protection are considered in an integrated manner rather than as competing objectives.

Draft SPP change	Reference	Why it helps and why it should be retained in the final SPP
The removal of the 2017 statements that a KRA does not authorise extraction, and that councils assess quarry applications under their schemes	[pp 25–26; 9, pp 33–34]	The CCAA welcomes the removal of the 2017 statements that: • identification of a KRA does not authorise extraction; and • quarry applications are assessed solely under local planning schemes. While these statements were technically correct, they offered little guidance about how State and regional supply needs should be weighed in development decisions. Their removal better reflects the strategic significance of KRAs and supports a stronger policy framework for protecting resources of state importance.
The four KRA mapping layers remain state mapping that must be appropriately integrated. A glossary note allows extraction in the separation area where its function is not compromised.	[Appendix 1; Glossary]	The CCAA supports retaining the four KRA mapping layers as State mapping that must be appropriately integrated into local planning instruments. Consistent mapping across Queensland provides certainty for resource operators, local governments and the community. The glossary clarification allowing extraction within a separation area where its function is not compromised is also supported, as it provides flexibility while maintaining the integrity of the KRA framework.

3. Suggested amendments to the draft SPP

The SPP amendments and additional recommendations outlined below are intended to ensure Queensland can maintain a reliable and affordable supply of construction materials to support housing, infrastructure and economic growth. The Oxford Economics analysis demonstrates that significant hard rock and sand supply constraints are emerging in SEQ. Similar constraints have also been identified by members in regional and rural Queensland. Without policy settings that both protect and facilitate access to identified resources, these shortages will worsen, increasing construction costs and delaying the delivery of housing and essential infrastructure.

Table 2 sets out additional changes sought by CCAA to strengthen the Mining and Extractive Resources State Interest and ensure the planning system not only protects KRA's, but also enables their responsible development.

Table 2: Additional amendments to the Mining and Extractive Resources State Interest

No.	Change sought	Facts and circumstances relied on
1	**State interest outcome (p 26)** Extractive resources are protected for use and their responsible extraction is facilitated to support an economical supply of construction materials. Mineral, coal, petroleum and gas resources are appropriately considered to support a strong mining and resource sector. ~~and avoid land use conflicts where possible~~…	Extractive resources differ from most other State interests because they are consumed in the process of delivering housing and infrastructure. Their public value is realised not merely through protection, but through their responsible extraction and use. A policy framework that focuses only on protecting resources risks achieving the opposite outcome to that intended. Resources that cannot be developed cannot contribute to housing supply, infrastructure delivery or economic growth. The practical importance of enabling identified resources to be used is illustrated by Hanson Construction Materials Pty Ltd v Sunshine Coast Regional Council & Ors [2026] QPEC 27 (7 July 2026), in which the Planning and Environment Court approved the proposed expansion of the Glass House quarry, subject to conditions. CCAA considers that protecting resources must be accompanied by workable pathways for their responsible extraction and use. The State Interest Outcome should therefore expressly acknowledge both the protection **and** responsible development of extractive resources. This would better align the policy with the purpose of the KRA framework and the practical needs of a growing State.

No.	Change sought	Facts and circumstances relied on
2	**Policy 2(a)** appropriately zoning land in KRAs to support the establishment, continued operation and appropriate expansion of extractive industries.	CCAA proposes this amendment to require planning schemes to place existing and future extractive resource areas within KRAs in zones that recognise and support their long-term function. Appropriate zoning provides greater clarity to communities about the intended use of KRAs and gives industry greater certainty that identified resources can be developed through a clear and predictable planning pathway. Resource protection should be established through strategic planning, rather than deferred to individual development applications. To support consistent implementation across Queensland, the final SPP and supporting guidance should expressly identify Extractive Industry zoning as the appropriate approach for existing and future resource areas within KRAs. Section 6.1 sets out the corresponding recommendation for the *Planning Regulation 2017*.
3	**Policy 2(c) & Policy 2(d)** Merge Policy 2(c) and Policy 2(d) together to read: avoiding ~~land uses~~ development on the transport route and within the transport route separation area of a KRA that ~~are likely to~~ will potentially compromise the: i. ~~ongoing use~~ existing and future use of the route for the haulage of extractive materials; and ii. the safe and efficient transportation of the extractive resource over the life of the resource.	Haul routes are critical infrastructure within the construction materials supply chain and should be protected accordingly. Development assessment should consider not only current freight movements but also reasonable future quarry operations. Otherwise, future supply capacity may be constrained by incremental development along designated haul routes before identified resources can be fully utilised. This change does not presume future quarry expansions should automatically be approved. Rather, it ensures local planning instruments are prepared to ensure planning decisions properly consider the long-term function of transport routes already identified within the KRA framework.

No.	Change sought	Facts and circumstances relied on
4	**Introduce new policy #3. Planning instruments to include appropriate assessment benchmarks, including reverse amenity provisions** To facilitate the responsible extraction of construction materials and maintain an economical supply of extractive resources essential for housing and infrastructure, planning instruments must include assessment benchmarks that support the use of KRAs while appropriately managing environmental and amenity impacts. Planning instruments must also include assessment benchmarks that address reverse amenity impacts arising from development within, adjacent to, or affected by a mapped KRA, including associated transport routes.	The CCAA considers that reverse amenity impacts on the ongoing and efficient operation of KRAs are not adequately addressed in many current planning schemes and, as a result, are often given insufficient weight in planning decisions. Without effective reverse amenity provisions, sensitive development can progressively encroach on quarry operations and haul routes, increasing land-use conflicts and restricting access to resources that are essential for housing and infrastructure delivery. Over time, this can sterilise strategically important resources even where they have been identified and protected through the KRA framework. The final SPP should provide clear guidance to local governments on incorporating reverse amenity considerations into planning schemes. This will help ensure continued access to locally sourced construction materials, reduce transport costs, and support broader State interests, including housing supply, infrastructure delivery and efficient urban growth. These assessment benchmarks should be supported by a consistent model code developed jointly by industry, local government and relevant State agencies, as recommended in **Section 6.2** of this submission. This would promote a more consistent and transparent approach to assessing quarry development and managing land-use conflicts across Queensland.

5	**New policy: #4. Supply assessment.** Local planning instruments must support an economically viable supply of construction materials to meet forecast housing and infrastructure demand. When balancing competing State interests, local governments must consider the aggregate and sand supply required to support the planned growth. Aggregate and sand supply planning must consider approved reserves, effective annual production capacity, the time required to bring new supply into production, transport costs and supply sources serving multiple local government areas.	Planning for growth should consider not only where housing and infrastructure will be delivered, but also how the construction materials needed to build that growth will be supplied. Numerous Planning and Environment Court decisions have recognised that longer haulage distances increase the cost of housing and infrastructure, while access to local supply improves competition and affordability. Housing targets, infrastructure programs and regional growth strategies can only be achieved if sufficient construction materials are available at the required scale, location and time. Accordingly, when preparing planning schemes and balancing competing State interests, state and/or local governments should be required to consider: • forecast construction material demand; • approved reserves; • effective production capacity; • the lead time required to bring new supply online; • transport costs; and • regional supply networks that serve multiple local government areas, recognising that construction raw materials move across council boundaries according to resource location, demand, transport access and the economics of efficient supply. Failure to consider these factors can create the appearance of adequate supply, when in reality, approved and economically recoverable resources are constrained. Planning for growth must therefore be supported by an evidence-based assessment of how construction materials will be sourced and supplied to meet future housing and infrastructure demand. This policy would strengthen the connection between growth planning and construction material supply planning,

No.	Change sought	Facts and circumstances relied on
		helping ensure that shortages do not become a constraint on housing delivery, infrastructure investment and economic growth.
6	**New policy: #5. Proportionate assessment.** The levels of assessment for extractive industry activities in KRAs must be proportionate to the potential impacts, level of risk, and consistency with the strategic intent and purpose of the relevant zone, overlay, local plan and/or precinct within the plan. Extractive industry development within a KRA that is consistent with the intended use of the **Extractive Industry Zone** must be identified as **code assessable** development.	The draft SPP promotes proportionate, risk-based assessment. This principle should be applied specifically to extractive industry development. Where extractive industry development is consistent with the planned use of an appropriately zoned KRA, it should be **code assessable** against clear technical requirements. Community consultation about the intended use of these areas should occur through the planning scheme preparation and amendment process. Subsequent development assessment should determine compliance with the applicable benchmarks, including requirements to manage environmental and amenity impacts. This approach would reduce unnecessary regulatory burden while maintaining appropriate environmental and community safeguards.
7	**New policy: #6. Streamlined assessment for temporary increases to quarry production in response to peak demands and major infrastructure projects.** Local planning instruments should provide proportionate and streamlined assessment pathways for temporary changes to quarry production and operating arrangements needed to respond to peak housing and infrastructure demand, where amenity impacts can be appropriately managed and Environmental Authority conditions remain satisfied	Quarries operate in cyclical markets and must be able to respond to short-term fluctuations in construction demand. Temporary operational measures that do not create significant additional impacts should not be subject to lengthy assessment processes. Where proponents can demonstrate that amenity impacts remain acceptable and Environmental Authority conditions are maintained, more streamlined approval pathways should be available. This would improve the industry's ability to respond to periods of peak demand while remaining consistent with the draft SPP's principles of timely, evidence-based and proportionate assessment.

4. Suggested amendments to the draft Minister's Guidelines and Rules (MGRs)

To ensure KRAs are effectively protected and can continue to support housing and infrastructure delivery, CCAA recommends the following amendments to the draft MGR's.

4.1 Resource Impact Assessment Requirements

For any planning scheme amendment that may materially affect a KRA, an existing extractive industry, or an identified haul route, supporting material should be required to:

- assess the impact on resource access, extraction, processing and transport;
- consider impacts on existing and reasonably foreseeable quarry operations;
- assess implications for regional construction material supply;
- explain the evidence, alternatives and planning rationale considered; and
- consult with industry.

This requirement should apply regardless of whether a streamlined plan making amendment pathway is used. Streamlined plan making processes should not remove the need to consider impacts on resources that are strategically important to the delivery of housing and infrastructure.

4.2 Adoption of updated KRA Mapping

The MGRs should provide clearer direction on how State-approved KRA mapping updates are incorporated into local planning schemes.

Where updated KRA mapping is approved by the State, local governments should be required to reflect the mapping promptly through the appropriate plan-making amendment process. Guidance should also clarify:

- when adoption of State mapping without modification can be treated as a minor amendment; and
- when associated zoning or policy changes require a more comprehensive amendment pathway.

These recommendations do not seek to change how KRAs are identified. Rather, they are intended to ensure State-approved resource mapping is consistently and efficiently implemented.

5. Suggested amendments to the draft Natural hazards guidance

CCAA supports the draft guidance's recognition that development should not be precluded simply because it is located within a mapped hazard area, provided risks can be appropriately managed.

To strengthen this approach, we recommend the guidance include the following principle:

> Natural hazard assessments should distinguish between the different components of an extractive industry operation, including extraction areas, processing infrastructure, hazardous materials storage, workforce access and haul routes. Assessments should be evidence-based, recognise effective mitigation measures, and evaluate impacts on public safety, neighbouring land uses and emergency response capability. The existence of a mapped hazard alone should not determine whether a proposal is acceptable.

In addition, the Government should:

- publish the assumptions and methodology used to prepare hazard mapping;
- notify affected landowners and operators when mapping changes are proposed;
- provide a mechanism for evidence-based corrections or refinements; and
- clearly communicate transition arrangements.

CCAA is not seeking blanket exemptions from natural hazard requirements, but rather a framework that supports robust, site-specific and evidence-based assessment.

6. Further Recommendations to the Planning Framework

6.1 Appropriate Zoning of KRAs

To support Policy 2(a), the planning framework should provide clearer direction about what constitutes "appropriate zoning" for KRAs.

The draft SPP identifies appropriate zoning as the primary means of protecting KRAs. However, many local governments currently zone undeveloped or greenfield KRAs as **Rural,** which does not reflect their strategic purpose and can create uncertainty for communities, landowners and investors.

CCAA recommends that the Queensland Government prepare guidance directing local governments to zone existing and future extractive resource areas within KRAs for their intended extractive use, with complementary provisions protecting separation areas and haul routes. The CCAA also recommends that the regulated requirements under the *Planning Regulation 2017* are amended to ensure that the purpose of this zone recognises:

- undeveloped resources as well as existing operations;
- the role and function of extractive resource areas within KRAs, supported by complementary protections for separation areas and haul routes; and
- the intended long-term nature of this land use.

Community consultation on the zoning and intended use should occur through the plan-making processes, rather than through a development application. Appropriate zoning would not itself authorise extraction; development would remain subject to the applicable assessment requirements and approvals.

6.2 Other further amendments to support industry reform

The current planning framework gives significant weight to local land use outcomes but does not consistently recognise the regional and State-wide importance of construction material supply.

Construction materials are fundamentally different from most land uses. Quarry resources are fixed in location, serve markets beyond local government boundaries and are essential to the delivery of housing and infrastructure across Queensland. For this reason, the planning system requires stronger State oversight, greater consistency in assessment and clearer mechanisms for ensuring that strategically important resources are not progressively sterilised through local decision-making.

The CCAA proposes the following principles to guide future planning reforms for the extractive resources sector:

1. Regional and State construction-material supply needs must be given appropriate weight in decision-making.

2. Assessment processes should be clear, timely, proportionate and accountable.
3. Local governments may remain the primary assessment manager, provided there is effective State oversight where broader State interests are affected.
4. Applications should be assessed on planning merits and technical evidence, not local popularity or opposition.
5. There should be an effective review or escalation mechanism for poorly reasoned or politically motivated decisions.

The CCAA's experience also highlights the ongoing need for stronger State oversight, improved technical capability, timely decision-making and coordinated resolution of transport and road infrastructure issues. Accordingly, the CCAA recommends that the Government:

- Make DNRMMRRD a concurrence referral agency for development affecting KRAs, with clearly defined referral triggers and assessment responsibilities.
- Introduce a State Code for KRAs that defines the assessment requirements applying to that referral role and supports consistent consideration of extractive resource interests.
- Develop a model code for quarry assessment and resource protection with industry, local government and State agencies for incorporation into local planning schemes, identifying where consistent provisions are needed and where local variation is appropriate.
- Establish a consistent framework for regional supply planning that distinguishes between:
    - approved reserves;
    - effective annual production capacity; and
    - the timing and likelihood of future supply entering the market.

Given the supply pressures already emerging and the investment lead times involved, CCAA seeks immediate progression of practical brownfield measures alongside the longer-term planning reforms.

These reforms would improve consistency, transparency and confidence in the planning system while supporting the long-term supply of construction materials needed to deliver housing and infrastructure.

7. Conclusion

The CCAA welcomes the draft State Planning Policy 2026 and supports its stronger recognition of Key Resource Areas as a critical State interest.

The draft SPP represents an important shift towards acknowledging that construction materials are essential to delivering housing, infrastructure and economic growth. However, identifying and protecting resources alone will not prevent future shortages. The planning system must also facilitate the timely and responsible development of those resources.

Oxford Economics forecasts peak annual hard rock demand in South East Queensland of 28-30 million tonnes between 2027 and 2029, compared with combined approved annual hard rock production limits of approximately 23.8 million tonnes. Currently approved natural sand reserves in SEQ covered by the analysis are also forecast to be depleted by 2030-31. Without reform, these supply constraints are likely to intensify, increasing construction costs and placing further pressure on housing affordability and infrastructure delivery.

CCAA therefore asks the Queensland Government to:

- retain the positive reforms contained in the draft SPP;
- adopt the additional amendments and recommendations outlined in this submission; and
- work collaboratively with industry to deliver a planning framework that protects and enables access to strategically important construction material resources.

Ultimately, the success of the KRA framework should not be measured by how much resource is protected on a map. It should be measured by whether Queensland can continue to access the construction materials needed to build homes, schools, hospitals, roads and other essential infrastructure. The recommended amendments will help ensure the planning system protects those resources and enables their responsible development before emerging supply shortages become a significant constraint on the State's growth and prosperity.