



18 March 2024

State Development Assessment Unit
Department of Planning, Lands and Heritage

Email: SDAUconsultation@dplh.wa.gov.au

Development Application – Holcim Concrete Batching Plant continued operation

Thank you for the opportunity to provide feedback on the Holcim Concrete Batching Plant's continued operation from its East Perth location.

The Urban Development Institute of Australia (UDIA) WA is the peak body representing the property development industry in WA, with members across both private and public sector organisations. Our Vision is for 'Diverse living options in thriving, connected communities', and we strive to support this in working towards our Purpose of 'Great places + Housing choice = Better lives'.

Concrete is a critical construction material in the delivery of supply across the housing continuum, as well as associated servicing infrastructure. With the State Government's focus on infill development within and around the CBD / central sub-region, affordable and readily available access to concrete is critical for project viability.

The proximity of concrete batching plants to construction activity is a critical component to the cost of concrete and in turn, the cost of construction. At a time when costs to build, particularly within an infill context, are at all-time highs, the addition of increased transit cost would be a burden worn by home buyers if project viability is still possible.

Lifecycle carbon emissions are a key focus of many of our members in the construction of new developments, the increased emissions because of longer and more frequent journeys by trucks will significantly add up in the calculation of the lifecycle emissions, increasing the carbon-intensity of construction serviced by this plant. This flies in the face of increasing consumer demand for carbon-sensitive developments and alternative options such as on-site plants are not viable in most cases due to site size constraints (particularly in an infill context).

While the plant has been operating since 1987, and many residents will have moved/purchased here with knowledge of this surrounding land use, it is understood and appreciated that there may still be some concerns around possible negative environmental impacts. Potential impacts associated with the production of pre-mixed concrete, such as storing of cement, water management, noise and dust control can be managed/mitigated with various management and technological practices, such as those outlined in the Cement Concrete & Aggregates Australia Environmental Management Guidelines for Concrete Batch Plants. If the impacts on surrounding residents are of concern, practices to mitigate such impacts should be adopted.

Much like Sydney, Melbourne and Brisbane, which all have access to close proximity batching plants in their CBDs, Perth also requires readily available access to concrete to continue the development of the CBD and surrounds.

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Not permitting an extension to operations, without a suitable relocation site having been identified would force closure and have a significant impact on building and construction activity in inner and central Perth. Amid a housing crisis and at a time when industry is already experiencing considerable challenges in delivering diverse and affordable housing, we ask that you consider the implications that this decision could have in further hampering industry's capacity to delivery housing as outlined above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tanya Steinbeck', written over a light blue rectangular background.

Tanya Steinbeck
Chief Executive Officer