

Submission from Straterra To Gore District Council Gore District Plan Review September 2022

Introduction

1. Straterra is the industry association representing the New Zealand minerals and mining sector including coal. Our membership is comprised of mining companies, explorers, researchers, service providers, and support companies.
2. We welcome the opportunity to submit on the Review of the [Gore District Plan](#).

Mining and the Gore District Plan

3. The extractive sector has an important role to play in the Gore District. There are a number of mines and quarries in the district providing important resources and contributing to the local economy and beyond.
4. Future as well as existing mines and quarries need to be accommodated in the District Plan.
5. In general, we support the Draft District Plan which is generally supportive of mineral extraction. Our submission focusses on points relevant to the extractive sector.

Provisions Relating to Mineral Extraction in the District Plan

Definitions

6. The definitions of **Earthworks**, and **Primary Production** are taken from the National Planning Standards. We support the use of these definitions and National Planning Standards definitions generally throughout the Draft Plan to avoid confusion and potential duplication.

General Rural Zone

7. Mineral extraction activities are supported in the General Rural Zone. This is referenced in the **Overview and Purpose** of the General Rural Zone, which we support.
8. We support **GRUZ-05** "The value and long-term benefits of using highly productive land for primary production is recognised and the availability of highly productive land for primary production for future generations is protected."

9. Mining is part of the definition of Primary Production in the Draft Plan's Definitions and the National Planning Standards. Land containing minerals is highly productive - mining generates many times more revenue per hectare than dairy, beef/lamb or horticulture.
10. We note that the Government's recently released National Policy Statement on Highly Productive Land extends to mining, even though it is targeted at agriculture and other soil using industries.
11. We support **GRUZ-P5** "Manage the environmental and cultural effects of quarrying and mining, whilst recognising the benefits of quarrying and mining activities on the local economy and supporting associated industries."
12. We are pleased with the reference to the benefits of mining in this policy. Recognising this is important, particularly in light of the Government's moves in the upcoming Resource Management Reforms, to plan for positive outcomes and not just manage adverse effects.
13. **GRUZ-R1** relates to Primary Production (which mining is a part of under the National Planning Standards definition of Primary Production) but it specifies quarrying and mining activities are not covered by this rule as they are subject to Rules and Standards in the Earthworks chapter EW-R6, EW-R7 and standards EW-S1 to EW-S7. It appears that some of these clauses may have been incorrectly labelled in the draft we have seen (EW-R6).

Earthworks

14. It is our view that mining and quarrying should be covered separately from the Earthworks chapter in district plans to avoid duplication and confusion. This reflects that mining and quarrying activities are typically significantly different activities from general earthworks. In addition, the definition of earthworks in the Draft Plan, taken from the national standards – which we support, does not specify mining and quarrying.
15. Only some of the provisions in the Earthworks chapter relate to mining and quarrying. It should be made clearer which provisions in the chapter are intended to capture mining and which aren't.
16. **EW-P1 (c)** recognises the benefits and necessity of earthworks "associated with rural production and extractive activities, where these are located in the General Rural Zone." We support the intent of this policy.
17. **EW-R7**, Prospecting for and Mining Minerals. This essentially says earthworks for mining is a restricted discretionary activity – we support this – and the matters of discretion.