

Submission from Straterra to Gore District Council on the Gore Proposed District Plan November 2023

Introduction

1. Straterra is the industry association representing the New Zealand minerals and mining sector. Our membership is comprised of mining companies, explorers, researchers, service providers, and support companies.
2. We welcome the opportunity to make this brief submission on the [Gore Proposed District Plan \(the Proposed Plan\)](#). Our submission is limited to issues impacting on mining.

Mining and the Proposed Plan

3. We are pleased the plan recognises the importance of the extractives sector. There are a number of mines and quarries in the district providing important resources including coal and aggregate and contributing to the local economy and beyond.
4. Future, as well as existing, mining activities need to be accommodated in the district plan and this potentially includes new mines for critical minerals which will be needed to power the low-emissions, green technology economy.
5. We consider the plan balances well the need for mining and the need to avoid adverse impacts from its extraction and processing.

Key points

6. The plan enables primary production generally (which is very positive) including mineral extraction. However, there is some ambiguity when it comes to mining on highly productive land, and it is not as enabling here as it should be.
7. The Proposed Plan needs to recognise that like highly productive soils, minerals are 'location specific' and because of the value of these resources, land containing them is highly productive.
8. We recommend that the council revisit the policies and objectives around highly productive land after planned changes to the National Policy Statement – Highly Productive Land (NPS-HPL) have been made by the incoming government.

Highly productive land

9. The Proposed Plan has accommodated the requirements of the NPS-HPL which could have implications for the mining sector.

10. The NPS-HPL places a significant focus on land-based agriculture and reliance on use of the soil.
11. Land containing minerals is also highly productive. In fact, it is significantly more productive than soils used for agriculture because of the value and scarcity of the minerals produced.
12. Like highly productive soils, mineral deposits are ‘location specific’ – limited in quantity, location, and availability. They can only be sourced from where they are physically located and where the industry is able to access them.
13. The original intent of the NPS-HPL was to protect highly productive land for future primary production. This would include mining, recognising that other factors in addition to soil determine the productive capacity of land.
14. Furthermore, mining is a recognised sector within “primary production” in everyday parlance and in a number of definitions, most particularly the National Planning Standards definition of primary production.
15. We understand the future of the NPS-HPL is highly uncertain under the incoming Government. The agriculture sector has identified a number of problems with it and we understand some officials want to repeal it. National policy statements generally are likely to be reviewed as part of the new Government’s reform of resource management law.
16. For these reasons, we recommend that the Council revisit the policy and objectives around highly productive land in the Proposed Plan.
17. In the next section we identify some objectives, policies and rules which are designed to protect highly productive land but there is ambiguity in some as to whether this would allow for mining as well as agriculture.

Specific provisions in the Proposed Plan

Interpretation

18. The Proposed Plan uses the National Planning Standards definition of **primary production**, which we fully support. This definition incorporates mining, as it should.
19. We oppose the definition of **highly productive land** (which is not taken from the National Planning Standards) as it doesn’t allow for land containing minerals, as discussed earlier.

General Rural Zone – overview and purpose

20. We support the Overview and Purpose of the [General Rural Zone](#) in which mining activities are specified as being supported in the rural area. *“The rural area supports a range of activities that rely on the land resource. This includes quarrying, mining ...”*

GRUZ-05

21. “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.”
22. We support GRUZ-05 the way it is worded. It is a recognition of the need to protect highly productive land including potential mining land. As stated in paragraphs 9-17 above, land containing minerals is highly productive and mining is part of the definition of primary production in the Proposed Plan’s definitions (as well as the National Planning Standards as discussed).

GRUZ-P5

23. “Recognise the benefits of quarrying and mining activities on the local economy and supporting associated industries through enabling small scale quarries and mines.”
24. We support this policy. It should be noted, the benefits of mining relate to the use minerals have to the district and country as well as the jobs, revenue, tax, and economic contribution etc. created by the mining activity itself.

GRUZ-P6

25. “Manage the environmental and cultural effects of quarrying and mining and avoid quarrying and mining activities that result in adverse cultural or environmental effects that cannot be avoided, mitigated or offset.”
26. We support this policy. It is a balanced statement when read alongside GRUZ-P5. We recommend that compensation be added to the list as this is a recognised way of managing environmental effects as well as mitigating and offsetting.

GRUZ-R1

27. We support GRUZ-R1 as it applies to primary production. However, quarrying and mining are explicitly excluded, and mining has its own rule, GRUZ-R2.

GRUZ-R2

28. GRUZ-R2 applies to mining activities.
29. It states that mining activities are permitted, which we support. But where it is located on highly productive land the activity status becomes discretionary.
30. We support GRUZ-R2 but oppose it where it relates highly productive land for the reasons stated in paragraphs 9-17 above.
31. We request that point 2, “The activity is not located on Highly Productive Land” be deleted. Or alternatively, the definition of highly productive land should be amended to incorporate land containing minerals.