# **SUBMISSION**



# Submission from Straterra on the Draft 2024 Waikato Future Proof Strategy February 2024

## Introduction

- 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 would like to thank the Future Proof Partnership for the opportunity to comment on the draft 2024 Waikato Future Proof Strategy.
- 3. The Future Proof Strategy is a 30-year growth management and implementation plan for the Hamilton, Waipā, Waikato and Matamata-Piako sub-region.
- 4. The strategy is being updated to, among other things, respond to changes in national and regional direction, including the National Policy Statement for Highly Productive Land (NPS-HPL).

## **Key points**

5. The finalisation of the Future Proof Strategy should be delayed until there is more certainty from the Government regarding the NPS-HPL and other national direction instruments.

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- 6. The Waikato District contains a number of regionally and nationally significant mineral resources including coalfields, iron sand deposits, limestone, and hard rock aggregate, sand and gravel resources. These resources are crucial to the district's economy and continued access needs to be maintained to help provide for the economic wellbeing of the district. Additionally, there are potential deposits of other critical minerals that will be crucial for the high-tech economy.
- 7. We would be concerned if the Future Proof Strategy, inadvertently or otherwise, led to encroachment on areas of mineral resources by non-mining land use activities or other protections.
- 8. We are pleased with references in the strategy to the importance of protecting mineral resources from future development. For example, we support Directive 9.7: "Development occurs in a way that minimises loss of access to important mineral resources and minimises reverse sensitivity issues for waste management facilities".
- 9. However, insufficient mention or follow-up is made of this in the strategy. We would be concerned if the document's emphasis on other areas, including the protection of agricultural soil, were to trump this and lead to unnecessary constraints on mineral resources access.



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- 10. For example, Waikato has large areas of highly productive land (Land Use Capability classes 1-3) and some of this overlaps areas of mineral resource. The updating of the strategy to incorporate the NPS-HPL puts mineral resources at risk.
- 11. Parts of Waahi Toituu and Waahi Toiora that relate to highly productive land could also encroach on areas of mineral resources.
- 12. It's important to be aware that mineral deposits are 'location specific'. They can only be sourced from where they are physically located and where the industry is able to access them.
- 13. Future mine development or extension of mine life, to meet ongoing customer needs will require access to land within and adjacent to areas of existing mining operations. There are some areas where highly productive land classifications could put this at risk, and we would like to see consideration given to this.
- 14. It should be noted that land containing mineral resources is also highly productive. In fact, it is more productive than soils used for agriculture because of the value and scarcity of the mineral resource relative to the value of agricultural commodities.
- 15. Furthermore, post mine or quarry closure, land can be returned or converted into highly productive farmland or other agricultural land. This is routine land rehabilitation practice for mining and quarry companies.
- 16. The Government intends to review the National Policy Statements and other national direction instruments. For these reasons we think there is merit in delaying the finalisation of the strategy until there is more certainty of direction in the NPS-HPL.