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Response Date	Aug 31 22
Notes	
Q 1	Select the chapter you want to provide feedback on
Q 2	In general, to what extent do you support the contents of this chapter?
Q 3	Objective/Policy/Rule/Standard reference:
Q 4	Feedback/Comments
Q 5	Objective/Policy/Rule/Standard reference:
Q 6	Feedback/Comments
Q 7	Objective/Policy/Rule/Standard reference:
Q 8	Feedback/Comments
Q 9	Objective/Policy/Rule/Standard reference:
Q 10	Feedback/Comments
Q 11	supporting documents?
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Q 12	If you need more space, or have any other general comments, please leave them here
Please find attached a submission on the Draft Waitaki District Plan from Straterra. Thanks Jeremy Harding Straterra 93 The Terrace Wellington 0276316161	

# SUBMISSION

## Submission from Straterra To the Waitaki District Council Draft Waitaki District Plan August 2022

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### 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.

We would like to thank the Waitaki District Council for the opportunity to comment on the Waitaki District Council Draft District Plan.

### General comments on mining in Waitaki

Mining has an important role to play in Waitaki District contributing 30.8% of the district's GDP. Most significantly, OceanaGold's Macraes Mine is partially located in Waitaki. OceanaGold employs 570 people at Macraes and the minerals mined make a major contribution to New Zealand's export receipts. There are also a number of quarries operating in the district producing essential inputs for growth and infrastructure development.

In addition to the existing operations, it is important that future mineral development opportunities are accommodated and to ensure that access to vital natural resources of value to the district and the country are not inadvertently shut off. It should be noted that exploring and, if successful, developing natural resources carries no direct cost, or risk, to the Council.

### Specific comments on the Waitaki District Plan

#### Macraes Special Purpose Zone

We support the use of a Special Purpose Zones for the Macraes Mine area and the two-tier approach within it i.e. an "Existing Mining Overlay" and a "Potential Mining Overlay".

In relation to the Macraes Special Purpose Zone (SPZMM), we support the submission of OceanaGold which owns the Macraes Mine.

Note additional points relating to the SPZMM in the Earthworks and Ecosystems and Indigenous Biodiversity sections, below.

#### Earthworks

Mining activities are addressed in Part C of the Earthworks chapter while quarrying for aggregate activities are addressed in Part B and general earthworks rules are set out in Part A.

We note and support statements in the Earthworks chapter, for example, on the top of page 384, which states: “Mining activities addressed in Part C of this chapter are not subject to the earthworks rules in Part A.”

This separation between mining (and quarrying) from general earthworks is important as extractive activities are significantly different from general earthworks. Ideally, in our view, mining should be covered separately from the earthworks chapter in district plans to avoid duplication and confusion, but we are satisfied that the separation into Part A and Part B in the Draft Waitaki District Plan, and the accompanying comments highlighting the distinction, adequately addresses this.

It is less clear that the general earthworks provisions do not apply to mining in the SPZMM. There are difficulties with interpreting and reconciling these. We recommend that the wording be clarified to show that the two are separate and where there are conflicts, the specific provisions of the SPZMM should prevail.

### **Ecosystems and indigenous biodiversity (ECO)**

We are generally supportive of the ECO objectives and policies whereby the effects management hierarchy is available to land development.

ECO-R4 and ECO-R5 both have the effect of making mining a non-complying activity where it is adjacent to or within a Significant Natural Area (SNA). We recommend the activity status be changed to discretionary, as it would be short sighted to make mineral development too difficult in these areas if the right opportunity arose.

As with earthworks, the Macraes Mining area is covered by the SPZMM as well as the ECO rules. We recommend mining activities in the SPZMM be excluded from the ECO rules, as the SPZMM rules already require consideration of indigenous biodiversity, and it is more appropriate for the special zone rules to cover those activities.

### **Mining in other zones**

Under EW(M)-P5 mining is ‘discouraged’ outside the General Rural Zone (and the Special Purpose Macraes Mining Zone) due to the ‘increased sensitivity of these receiving environments’.

We agree with the sentiment that there are places where mining is not appropriate due to its environmental impacts. It is important that the term ‘discourage’ does not translate as ‘prohibit’ as it would be unwise to totally shut down the opportunity to develop mineral resources due to the location specific nature of mining, and so access to a consenting pathway should be available.

### **National policy statements**

We are conscious that the Waitaki District Council District Plan is being prepared at a time of change with central Government in the process of introducing National Policy Statements for Indigenous Biodiversity and Freshwater (affecting Natural Wetlands). The Council will need to respond to these so that the Proposed District Plan gives effect to these documents.