

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the proposed Waimakariri District Plan

STATEMENT OF EVIDENCE OF STEPHANIE AMANDA LOUISE STYLES

FOR

DAIKEN NEW ZEALAND LTD

27 April 2023

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1.0 SUMMARY

- 1.1 This evidence relates to the submission lodged by Daiken New Zealand Ltd (“**Daiken**”). This planning evidence focusses on responding to matters raised in the Hearing Streams 1 and 2. Subsequent planning evidence will be prepared for further hearing streams as required.
- 1.2 The recommendations of the Council officer are acknowledged, and this evidence seeks some additional, minor text amendments to better recognise the issue of reverse sensitivity effects at the strategic level of the Plan.

2.0 QUALIFICATIONS, EXPERTISE AND INVOLVEMENT

- 2.1 My name is Stephanie Amanda Louise Styles. I hold the position of Senior Resource Management Planner with the environmental consultancy firm Boffa Miskell Limited, based in the firm's Christchurch office. I have been employed by Boffa Miskell since 2004.
- 2.2 I hold a Bachelor of Planning (Hons) from Auckland University. I am also a full member of the New Zealand Planning Institute. I have over 25 years' experience in planning and resource management. I am an accredited commissioner and hold a IAP2 International Certificate in Public Participation.
- 2.3 I have been a planning consultant based in Christchurch for over 25 years, providing consultancy services for a wide range of clients around New Zealand, including local authorities, central government, land developers, and the infrastructure and power sectors. Prior to that I worked in local government.
- 2.4 My experience includes applications for and processing of resource consent applications, statutory planning and policy preparation, and public consultation processes. I have provided advice on a broad range of developments and resource management issues to Councils and a range of clients, a number involving presenting evidence before councils, and the Environment Court. I also have extensive experience

in assisting with, and advising on, plan preparation under the Resource Management Act 1991 ("**RMA**").

- 2.5 I have assisted Daiken with the review of the proposed Waimakariri District Plan ("**WDP**") and in making submissions on the proposed WDP. This evidence provides a planning assessment in relation to the matters raised in the Daiken submission.

3.0 CODE OF CONDUCT

- 3.1 I have read the Code of Conduct for expert witnesses in the Environment Court Practice Note. I agree to comply with this Code. The evidence in my statement is within my area of expertise, except where I state that I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

4.0 DAIKEN NZ LTD AND THE ASHLEY SITE

- 4.1 Daiken owns and operates a medium density fibreboard (MDF) manufacturing plant at Ashley in the Waimakariri District. The Ashley site, located on Upper Sefton Road between Ashley and Sefton townships is approximately 160 ha in total and operates a single integrated manufacturing operation. Manufacturing facilities occupy a footprint of 20ha while the balance of the site is used for associated wastewater treatment and irrigation systems, as well as a buffer zone to wastewater disposal. The Site (including dispatch of finished goods) operates 24 hours per day, 7 days per week.
- 4.2 The plant on the site consists primarily of one MDF production line, built in 1994. The plant currently processes approximately 250,000 tonnes of Canterbury and West Coast wood each year, producing 110,000 cubic metres of MDF. The plant and its associated activities on the site are a significant presence in the Waimakariri District directly employing around 120 employees on site, with many other people employed in support roles, and in upstream and downstream industries.

- 4.3 A more detailed description of the Daiken site and existing activity is included in **Appendix One** to this evidence.
- 4.4 The Daiken site has a special zoning in the current WDP (Business 3 Zone) to recognise the unique nature (as well as the large scale and the nature of the effects) of the activities undertaken on the Site, as well as the functional need for a large area of land on which to undertake those activities. The land around the Site is currently zoned Rural. The Site is proposed to be zoned Heavy Industrial in the proposed District Plan, while surrounding land is proposed to be zoned Rural Lifestyle. The Heavy Industrial Zone (HIZ) applies to only three sites within the district.
- 4.5 The focus of the submission by Daiken is in providing recognition for the long-established facility on the site and in appropriately providing for its continued operation in the future.

5.0 HEARING STREAMS 1 AND 2

- 5.1 Nine of the submission points within Daiken's submission¹ relate to hearing streams 1 and 2. For a number of these, the section 42A reporting officer has recommended accepting the submission points and that is acknowledged², with no evidence being prepared on those points. The following assessment relates to the remaining four submission points.

6.0 SD STRATEGIC DIRECTIONS

- 6.1 The submission point relating to Objective SD-O4³ sought to add some additional wording to the objective to recognise existing non-rural activities that occur in the rural area and which merit protection from reverse sensitivity.
- 6.2 Waimakariri District has a number of large scale, non-rural activities that are lawfully established within the rural environment, including the

¹ Submission points 145.7-145.15.

² Submission points 145.7, 145.9, 145.10, 145.13, and 145.14.

³ Submission point 145.8.

Daiken plant. While the Daiken plant processes rural resources, it is not rural production by definition due to its scale, however it is integrally linked to the rural environment due to its location and reliance on forestry products. The recognition of such an activity within the rural environment at this strategic level would assist in protecting the activity from reverse sensitivity in the same way as is applied to other rural activities.

- 6.3 In my opinion the wording amendment sought would not undermine the strategic approach to the rural area and would acknowledge these substantial rurally located existing activities in a way that provides recognition of their importance to the district. I recommend the wording be amended as follows:

Outside of identified residential development areas and the Special Purpose Zone (Kāinga Nohoanga), rural land is managed to ensure that it remains available for productive rural activities by: ...

2. *ensuring that within rural areas the establishment and operation of rural production activities **and the continued operation of existing non-rural activities** are not limited by new incompatible sensitive activities.*

7.0 UFD URBAN FORM AND DEVELOPMENT

- 7.1 The submission points relating to Policies UFD-P2, UFD-P3 and UFD-P10⁴ sought to recognise the potential impact of new residential activities within Residential Development Areas or in Large Lot Residential Zone areas on existing activities, and in particular to ensure that the policy on reverse sensitivity also provided for existing industrial activities. The Council officer's report considers it unnecessary to repeat the reverse sensitivity protection within policies 2 and 3, instead recommending an amendment to policy 10 to ensure that policy recognises "*the interface between industrial and residential*"⁵.

⁴ Submission points 7.2 145.11, 145.12, 145.15.

⁵ Section 42A report on UFD section, paragraph 125.

- 7.2 The Council officer's report in assessing the submission points on policies 2 and 3 has focussed on the concept of a separation distance between activities, noting policies in HIZ-P1, LLRZ-P3(2) and NOISE-O2⁶. I agree that there are provisions in those parts of the WDP that seek to provide separation of activities, however the policies in the UFD section look at the location and provision of new residential areas. As currently written, those policies do not require consideration of potential reverse sensitivity effects when looking to locate new residential areas (e.g. at the time of a rezoning of land). This is a matter that should be considered and provided for at this strategic level, and I recommend that these two policies be amended to include this matter as follows:

UFD-P2 In relation to the identification/location of residential development areas: ...

2. *for new Residential Development Areas, other than those identified by (1) above, avoid residential development unless located so that they: ...*

g. are a sufficient distance away from any Heavy Industrial Zone to avoid reverse sensitivity effects.

or in the alternative:

g. consider the need to avoid reverse sensitivity effects on existing activities.

UFD-P3 In relation to the identification/location of Large Lot Residential Zone areas: ...

2. *new Large Lot Residential development, other than addressed by (1) above, is located so that it: ...*

f. is a sufficient distance away from any Heavy Industrial Zone to avoid reverse sensitivity effects.

or in the alternative:

⁶ Section 42A report on UFD section, paragraph 118.

f. _____ considers the need to avoid reverse sensitivity effects on existing activities.

- 7.3 The Daiken submission point focussed on avoidance of reverse sensitivity in relation to the Heavy Industrial Zone. If the Panel is concerned this is too focussed, then the amendment could also be simplified to direct consideration of avoiding reverse sensitivity effects generally.
- 7.4 In relation to policy UFD-P10, it is acknowledged that the Council officer's recommendation is to include reference to industrial activities within the policy (as well as other amendments) and I agree that this is important in recognising and addressing reverse sensitivity effects.
- 7.5 The submission point by Daiken also requested that the policy be amended to relate to rural zones, as well as residential zones. The policies within this section address both urban form in terms of new zones and development areas, and development of activities within various areas. While policy 10 is currently limited to residential zones, it is relevant also to rural zones and applying the same approach to considering reverse sensitivity in rural zones is important. I recommend that the policy be amended to include this reference as sought in the Daiken submission, as follows:

*Within Residential **and Rural** Zones and new development areas in*

...

2. *Minimise reverse sensitivity effects on **industrial and** primary production from activities within new development areas through setbacks and screening, **or other methods**, without compromising the efficient delivery of new development areas.*

8.0 CONCLUSION

- 8.1 I consider that the strategic sections of the WDP need to appropriately recognise existing large-scale activities and consider the issue of reverse sensitivity effects. The minor text amendments recommended

and assessed above will, in my opinion, assist in improving clarity and direction for the Plan.

APPENDIX ONE: ROLE OF DAIKEN NZ LTD

Daiken NZ Ltd (Daiken) owns and operates two medium density fibreboard (MDF) manufacturing plants in New Zealand, with one located at Ashley in the Waimakariri District and the other located at Matura, Southland.

Daiken's Ashley site, located on Upper Sefton Road between Ashley and Sefton townships is approximately 160 ha. in total and operates a single integrated manufacturing operation.

Manufacturing facilities occupy a footprint of 20ha while the balance of the site is used for associated wastewater treatment and irrigation systems, as well as a buffer zone to wastewater disposal.

The Site (including dispatch of finished goods) operates 24 hours per day, 7 days per week.

The plant on the site consists of one MDF production line built in 1994. MDF from the Ashley plant are reconstituted wood panels produced using wood fibres from local renewable plantation forests which are combined with resin and wax in a refining, drying, forming, pressing, and sanding process. MDF is produced from quality softwood sources such as radiata pine and has unique attributes in colour, strength and machinability which make it highly sought after in international MDF markets. The plant processes approximately 250,000 tonnes of Canterbury and West Coast wood each year, producing 110,000 cubic metres of MDF.

The plant and its associated activities on the site are a significant presence in the Waimakariri District directly employing around 120 employees on site, with many other people employed in support roles, and in upstream and downstream industries.

Operations on the site include:

- a) The range of manufacturing activities is broad including a log yard (de-barking and de-chipping), stockpiles, driers with cyclones, processing and packaging operation, wastewater/effluent storage, treatment and irrigation, stormwater management, offices, site cafeteria (not public), existing residential units on the wider site, light and heavy vehicle movements, lighting required for security and operations, and hazardous substances stored on the site (bulk storage of resin and diesel).
- b) The Site is entirely self-contained in terms of most services (water supply, stormwater disposal, effluent disposal). Power and telecommunications provided from overhead and underground lines with transmission lines running through part of the site. Most plant infrastructure such as pipes, cables, etc is above ground.

- c) There are a number of noise sources on the site from other plant which must operate 24/7 (e.g. fibre relay and transport fans). Noise sources on the Site are predominantly concentrated along Upper Sefton Road and plant has been designed to achieve noise limits in the current District Plan (with some remaining updates to noise mitigation underway currently).
- d) Daiken holds two land use consents from District Council which authorise wastewater treatment and disposal (1998) and earthworks to construct the wastewater storage ponds (2018). Otherwise, the plant operates largely under the permitted activity rules in the current District Plan.
- e) The current B3 zone in the operative District Plan recognises the existing nature of the activities undertaken on the Site and the importance/benefits of those activities to the District. The rules provide for such activity to continue to operate and allow some flexibility for change in the operations within the site.
- f) Daiken also holds a suite of consents from the Regional Council in relation to its activities on the site.

The Daiken site has a special zoning in the current District Plan (Business 3 Zone) to recognise the unique nature (as well as the large scale and the nature of the effects) of the activities undertaken on the Site, as well as the functional need for a large area of land on which to undertake those activities.

The land around the Site is currently zoned Rural. That land is currently farmed and there are only a few dwellings located near site.

The Site is proposed to be zoned Heavy Industrial in the proposed District Plan, while surrounding land is proposed to be zoned Rural Lifestyle (see Appendix 1). The Heavy Industrial Zone (HIZ) applies to only three sites within the district.