

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

2 August 2023

Contents

1.0	SUMMARY	2
2.0	QUALIFICATIONS, EXPERTISE AND INVOLVEMENT	2
3.0	CODE OF CONDUCT	3
4.0	DAIKEN NZ LTD AND THE ASHLEY SITE	3
5.0	HEARING STREAM 5	4
6.0	NOISE	4
7.0	CONCLUSION	6
	APPENDIX ONE: ROLE OF DAIKEN NZ LTD	7

1.0 SUMMARY

- 1.1 This evidence relates to the submission lodged by Daiken New Zealand Ltd (“**Daiken**”), submission number 145. This planning evidence focusses on responding to matters raised in the Hearing Stream 5. 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 one additional policy to better recognise the issue of reverse sensitivity effects for the existing large scale industrial activity operated by Daiken.

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 STREAM 5

- 5.1 A number of the submission points within Daiken's submission¹ relate to hearing stream 5. For most 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 submission point in relation to a noise policy dealing with reverse sensitivity.

6.0 NOISE

- 6.1 The submission point from Daiken relating to the Noise policies³ sought the addition of a new additional policy to recognise the potential for reverse sensitivity noise effects on major existing activities such as those undertaken on the Daiken site from new noise sensitive activities.
- 6.2 As noted in the s42A report, the Noise objective NOISE-O2 specifically seeks to address the issue of reverse sensitivity and specifically

¹ Submission points 145.16 – 145.18, 145.23 – 145.27 and 145.66.

² Submission points 145.16, 145.17, 145.18, 145.23, 145.24, 145.26, 145.27, and 145.66.

³ Submission point 145.25.

includes reference to activities in industrial zones and activities identified in noise chapter rules (an addition recommended by the s42A author to include the Daiken site and operations). The s42A report author then goes on to state *“A policy would give effect to the objective and to the policies in the RPS, including Policy 5.3.2(2) that seeks to enable development which avoid or mitigate “reverse sensitivity effects and conflicts between incompatible activities”.*⁴ I agree.

- 6.3 The s42A author then goes on to state *“While the zone chapters include rules for separation between activities for a range of effects (including noise), there may be benefit in having a more specific policy providing direction for reverse sensitivity effects for the activities where the Noise Chapter rules provide protection, specifically regarding ‘noise sensitive activities’.* This applies to the HIZ Daiken site, as there is a specific rule contained in the Noise Chapter (NOISE-R1) and Noise Control Contour provisions (including contours on the planning map). ... However, NOISE-P1(3) already gives direction to limit the *“location of noise sensitive activities where they may be exposed to noise from existing activities”.*⁵ While this assessment appears to support a specific policy, the recommendation is to reject the submission point, presumably relying on policy P1(3) to address the issue.
- 6.4 In this regard I note that the clause referred to in policy P1(3) should be read as part of the whole of that policy which seeks to minimise adverse noise effects and focusses on the nature of activities causing noise effects, rather than dealing with reverse sensitivity per se⁶. While the clause could be interpreted to apply to reverse sensitivity, it is not explicit to that effect nor is it easily identifiable as being intended to

⁴ Proposed Waimakariri District Plan: Te orooro – Noise Report, Jessica Manhire, 21 July 2023, paragraph 156, page 27.

⁵ Proposed Waimakariri District Plan: Te orooro – Noise Report, Jessica Manhire, 21 July 2023, paragraphs 158-159, page 28.

⁶ NOISE-P1 *Minimising adverse noise effects*

Minimise adverse noise effects by:

- 1. limiting the noise level, location, duration, time, intensity and any special characteristics of noise generating activities, to reflect the function, character and amenity values of each zone;*
- 2. requiring lower noise levels during night hours compared to day time noise levels to protect human health, natural values and amenity values of sensitive environments; and*
- 3. requiring sound insulation, or limiting the location of noise sensitive activities where they may be exposed to noise from existing activities.*

implement objective O2 or the RPS as it is located within a general policy. The issue of reverse sensitivity is significant enough to have an objective and thus in my opinion merits specific policy recognition. Further I note that policies 4 and 5 are explicitly included to address reverse sensitivity in relation to airport/airfield noise, but there is no policy recognition of industrial zones and existing activities which are also covered by the objective.

- 6.5 In my opinion the addition of a specific policy as sought in the submission would better recognise the issue of reverse sensitivity. In addition, it would draw a direct line of sight between Objective O2 and the rules that implement the objective, and would improve clarity and useability of the District Plan for this issue. I continue to recommend that an additional policy be included as follows:

NOISE-P6 Existing Activities

Avoid the development of noise sensitive activities in the Rural Lifestyle Zone within any noise contour associated with a Heavy Industrial Zone or in close proximity to the existing processing plant located between Upper and Lower Sefton Roads.

7.0 CONCLUSION

- 7.1 I consider that the noise section of the WDP needs to appropriately recognise existing large-scale industrial activities and consider the issue of reverse sensitivity effects caused by new noise sensitive activities. The additional policy recommended and assessed above will, in my opinion, assist in improving clarity and direction for the Plan to deal with reverse sensitivity.

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.