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22<sup>nd</sup> July 2019

Gareth Clarke  
Invercargill City Council  
Private Bag 90104  
INVERCARGILL 9840

Dear Gareth

**JOB NO 6800 – JJ LTD - REQUEST FOR FURTHER INFORMATION**  
**ICC ref: RMA/2019/109**

Thank you for your letter dated 17<sup>th</sup> July 2019 requesting further information for the land use application for the JJ Ltd development at Lorneville corner. We respond as follows:

1. Servicing

Stormwater from roof areas will be stored in tanks for general water supply for the business. Stormwater from hard stand areas will be disposed of on site. No consents for from Environment Southland are required as any excess stormwater discharge will be to land and the discharge will not be from a reticulated system.

Wastewater will be disposed on site with the design and location of the disposal fields to be determined at detailed design stage for the building. The site has a suitable area available for on-site wastewater management.

Fire fighting requirements will also be determined at detailed design stage.

- If the buildings are sprinklered then the classification under SNZ PAS:4509:2008 will be FW2 and 45m<sup>3</sup> of static storage will be required. This can be by way of tanks on site.
- If the buildings are not sprinklered the classification under the standard is FW6 and approximately 2160m<sup>3</sup> will be required as a static supply. This would need to be by way of a pond on site (within 90m of the building. The site is large enough to enable this level of supply to be provided.

Fire fighting requirements will need to be confirmed at building consent stage.

2. Hazardous Substances

The business will store low levels of oils, coolants, gas (for welders), and fuel on site. The quantities of each substance are less than that permitted in Appendix VII of the District Plan. No consents are required for the on-site storage of hazardous substances.

3. Parking

30 staff/management is the maximum anticipated to be employed. Of those 5 staff drive 'workshop vehicles' that will be parked within the workshop during the day. 3 salesmen are on the road all day. So there will be no more than 27 staff on site at any one time.

Workshop vehicles will park either beside the tractor/machinery they are working on or under the verandah in front of the bay. There are 5 carparks available in this area (not 8).

4. Signage

The pylon signage will be the only sign illuminated. There will also be some security lighting.

5. Rural Amenity and Consideration of Alternatives

The application provides a discussion of the reasons why the applicant wishes to relocate the rural service business to the rural area. This includes the site constraints of the current city location, the current requirement to test machinery of city streets and the requirement for customers to drive their machinery in to the heart of the city for servicing.

Further the proposed location, while zoned Rural, is a significant area for similar types of farm machinery sales and servicing businesses. The surrounding three corners of the site have existing rural service activities operating. While it is noted that the area to the north east is currently less developed – barring the existing residential development along the State highway – the use of the site as proposed will not unduly affect the amenity of the area. The buildings make up a total area of approximately 2000m<sup>3</sup> on a total site area of 9.7236ha (or 2% of the site area). The site will therefore largely retain the sense of open space associated with the rural area while allowing the location of a rural service activity amongst existing development of a similar nature.

6. Noise

It is anticipated that the vehicle testing area may be used for 30 minutes once per day on average. There is likely to be more testing in summer than in winter. The machinery being tested is typical machinery found on any farm and will operate for shorter duration than for instance a tractor working on a farm. The resultant noise levels should therefore be less than those for a typical farm.

**Rule 3.13.2 Noise Levels from Activities**

(A) All activities are to be designed and operated so that the following noise limits are not exceeded:

	Daytime 0700 - 2200		Night time 2200-0700	
	LAeq	LAmx	LAeq	LAmx
<b>When measured at any point within the boundary of any other site within a zone:</b>				
<i>Rural</i>	65dB	85dB	45dB	70dB
<b>When measured at any point within the notional boundary of any noise sensitive activity on a site within a zone:</b>				
<i>Rural</i>	50dB	80dB	45dB	65dB

The site will not operate at night so the relevant levels are the daytime 0700-2200 limits.

Typical noise levels from a tractor (at source) are approximately 97 dB LAeq. Noise decreases over distance so (using the inverse square law) with the 20 metre buffer to the site boundary proposed the anticipated level at the boundary will be 70dB LAeq decreasing to 61dB at the closest dwelling assuming no tree lanes. The tree lanes will provide further mitigation of this. However it is likely that noise levels may at LAeq level will be breached during the brief periods when machinery is being tested. The LAmx levels will not be breached.

Where hedges and tree lanes are located on neighbouring properties, the applicant will have no control over the retention of those trees/hedges. Any trees/hedgerows located on the applicants land will be retained or replaced if necessary. It is noted that the neighbouring landowners have provided written approval to the proposed site usage and therefore effects on those parties can be disregarded.

It is also noted that farm machinery is exempted from compliance with the nominated noise levels but it is accepted that the testing of the tractors is likely not considered as part of that exemption.

Overall the noise effects resulting from machinery testing will be less than minor. The activity will occur infrequently and for short periods of time, being no more than 30 minutes per day, which reduced frequency in winter months.

Please contact me if you require any further information.

Yours faithfully

**BONISCH CONSULTANTS**

A handwritten signature in blue ink, appearing to be "Christine McMillan".

Christine McMillan

*encl*