



26 July 2024

PA and JM Murray Trust
C/- Scott Dickson
Bonisch Consultants
19 The Crescent
PO Box 1262
Invercargill 9840

Dear Scott,

APPLICATION UNDER THE RESOURCE MANAGEMENT ACT 1991 TO ESTABLISH AND OPERATE A FARM MACHINERY SALES AND SERVICE BUSINESS – RURAL ZONE AT 30 WALLACETOWN LORNEVILLE HIGHWAY, INVERCARGILL, RMA/2024/80.

The Council received your application for the above activity on 8 July 2024.

We require further information from you to better understand your application and any effects it may have on the environment. We are requesting the information under Section 92 of the Resource Management Act 1991 (the Act).

Rural Character and Amenity

The application has been reviewed by a consultant landscape architect, and the following further information is required:

1. The description and analysis of the existing landscape and values is well described but brief and relies heavily on the photos to provide an understanding of the site and context. The photos are useful and are considered sufficient in number and to have been taken from sufficiently representative locations.
 - a) Does the Assessment consider that highly productive land has a bearing on rural character and landscape values and if so, will there be any landscape/ rural character effects as a result of the proposal in this location?

2. Under the assessment of 'physical effects' the Assessment states:
"The proposed development will result in another rural service building in an area already characterised by such buildings, and other commercial premises. It will reinforce the rural service centre / settlement character at the expense of open rural character, but in my assessment, landscape sensitivity to development of this nature is low, due to the existing character."
 - a) Due to the description of the existing character being limited, the attributes that make up the 'rural service centre / settlement character' (other than other rural service buildings) are not clear. Can the Assessment expand briefly on

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the land use/ building form patterns (e.g setbacks, building heights, and relationship between buildings and surrounding open space) and describe the specific way/s in which the proposal may be in keeping with these to help determine the extent to which the proposal will reinforce this character?

- b) Similarly, can the Assessment expand on the nature and degree to which open rural character will change as a result of the proposal as a rationale to support the statement above?
 - c) Can the assessment expand on the assessment of the proposal against the Objectives and Policies relating to rural character and amenity (noting that the subject site is within the Rural Zone, not the adjacent Business 5 Zone).
3. Under 'visual effects' the Assessment describes publicly accessible views from the adjacent road and private views from two nearby dwellings (24 and 70A Wallacetown Lorneville Highway).

The Assessment explains that while there are other dwellings in the area, the proposed facility will be effectively screened from these places by existing plantings and / or built form.

It is noted that there are buildings other than dwellings in the immediate vicinity, with different groups of people e.g. staff and visitors at businesses / commercial buildings, with potential views.

While it is recognised that development that is in keeping with the landscape character may have no adverse landscape and visual effects even if it is highly visible and a noticeable change, it is helpful to be able to show that the potential audience has been considered.

- a) Can the Assessment briefly expand on the potential viewing audience associated with the area from where the proposal will be seen and the nature and degree of effects or explain why they may not be impacted.
 - b) Can the Assessment clarify whether the existing (screening) plantings referred to are on the applicant's property, and if not, whether/how views to the project site may be impacted if vegetation was to be removed?
 - c) It is noted that there are potential elevated views from the railway overpass on the Wallacetown Lorneville Highway and may be potential for views from a dwelling at 78 Wallacetown Lorneville Highway. Has the Assessment considered visual effects from these locations?
 - d) In assessing views from the private property at 24 Wallacetown Lorneville Highway, the Assessment notes that proposed planting will completely screen views within 5 years. There currently appear to be gaps below and between the existing boundary vegetation towards the northeast corner of the site, however the proposed *Pittosporum* screen planting (on the Landscape Mitigation Plan provided) is not continuous through this area. Can the Assessment confirm that views will be completely screened at this boundary?
 - e) Can the Assessment also expand briefly on potential views and visual effects for these residents along their driveway.
4. Can the Assessment consider potential landscape and visual effects during the construction period (and provide an estimated construction timeframe) particularly given the proposal to remove some existing perimeter vegetation as part of the project.
5. The Assessment states that '*The planting illustrated in Figure 6 and specified in Appendix A, is to be implemented within 6 months of the completion of the building.*'

Has the Assessment considered earlier implementation to more quickly manage any identified landscape and visual effects?

Earthworks

- Please provide an earthworks plan showing all proposed earthworks information including area and volume of earthworks, depth of cut/height of fill, any proposed retaining (if required), and any bunding or stockpiles proposed.

Noise effects

- Rule NOISE-R3 notes that within the Rural zone, any operational equipment which is mobile during its normal use and which is associated with primary production (e.g. tractors, harvesters and farm vehicles) is exempt from the noise limits detailed in NOISE-R2. This exemption would not apply to the proposed non-rural activity (farm machinery sales and service activity, and the associated testing of farm machinery). Please provide further information to describe the likely frequency of the farm machinery testing on the site, identify which area of the site the testing will be undertaken, and provide a noise assessment to demonstrate that the activity will comply with the District Plan noise limits, particularly in relation to the adjacent property at 24 Wallacetown Lorneville Highway.

Engineering

- The applicant has proposed on-site stormwater management system to be used to capture water for potable water and firefighting services. Please provide additional stormwater information, including pre and post development flows and calculations for on-site stormwater attenuation.
- Please also provide further information and detail to confirm how RURZ-R17 (1)-(5) will be met, including location and capacity of tanks, location of hardstand areas and access for fire appliances.

Assessment of Regional Policy Statement and Part 2 RMA

- Please provide an assessment against Part 2 of the RMA.
- Please provide an assessment of the relevant objectives and policies of the Southland Regional Policy Statement.

Cumulative Effects and Precedent

- Please provide an assessment on cumulative effects of establishing a non-rural activity within the Rural zone, as well as on land subject to the NPS-HPL.
- Please provide further assessment on whether the granting of this activity would establish a precedent.

Affected Parties

You have noted that you are currently seeking the written approval of the following affected parties:

- *Owners and Occupiers of 24 Wallacetown Lorneville Highway*

Please provide this written approval once it has been received. (Note: further affected parties may be identified prior to a decision being made on this application).

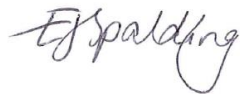
Under Section 92A you are required to undertake one of the following options within 15 working days of the date of this letter:

- 1) Provide the requested information
- 2) Give written notice to the Council that you will provide the requested information
- 3) Give written notice to the Council that you refuse to provide the requested information.

We must consider your application under section 104 of the Act even if the requested information is not made available. This may result in refusing to grant consent on the grounds that it has inadequate information to determine the application.

For further enquiries please contact me on 027 696 1009 or email me emma.spalding@taylorplanning.co.nz.

Yours sincerely

A handwritten signature in cursive script that reads "E. Spalding".

Emma Spalding
CONSULTANT PLANNER