

Before a Board of Inquiry
MacKays to Peka Peka Expressway Proposal

under: the Resource Management Act 1991

in the matter of: Notice of requirement for designation and resource consent applications by the NZ Transport Agency for the MacKays to Peka Peka Expressway Proposal

applicant: **NZ Transport Agency**
Requiring Authority

Statement of rebuttal evidence of **Graeme Ridley** (Erosion and Sediment Control) for the NZ Transport Agency

Dated: 25 October 2012

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TABLE OF CONTENTS

EXECUTIVE SUMMARY	2
Robert van Bentum (KCDC)	3
Dr Death (KCDC)	5
Emily Thomson (KCDC).....	7
Alton Perrie (GWRC).....	9
Brian Handyside (GWRC)	10
Richard Percy (GWRC)	21
CONCLUSION	24
ANNEXURE A – PROPOSED CONDITIONS REFERRED TO IN THIS REBUTTAL STATEMENT	26
ANNEXURE B – REVISED USLE CALCULATION SPREADSHEETS.....	33

STATEMENT OF REBUTTAL EVIDENCE OF GRAEME RIDLEY FOR THE NZ TRANSPORT AGENCY

- 1 My full name is Graeme John Ridley.
- 2 I have the qualifications and experience set out at paragraphs 1 to 5 of my evidence in chief, dated 3 September (*EIC*).
- 3 I repeat the confirmation given in my EIC that I have read, and agree to comply with, the Code of Conduct for Expert Witnesses (Consolidated Practice Note 2011).
- 4 In this statement of rebuttal evidence, I respond to the evidence of:
 - 4.1 Robert van Bentum on behalf of Kāpiti Coast District Council (*KCDC*) (submission no. 682);
 - 4.2 Shona Myers on behalf of *KCDC*;
 - 4.3 Dr Death on behalf of *KCDC*;
 - 4.4 Emily Thomson on behalf of *KCDC*;
 - 4.5 Alton Perrie on behalf of Greater Wellington Regional Council (*GWRC*) (submission no. 684);
 - 4.6 Brian Handyside on behalf of *GWRC*; and
 - 4.7 Richard Percy on behalf of *GWRC*.
- 5 The fact that this rebuttal statement does not respond to every matter raised in the evidence of submitter witnesses within my area of expertise should not be taken as acceptance of the matters raised. Rather, I rely on my earlier report, Appendix H of the Construction Environmental Management Plan (*ESCP*), my EIC and this rebuttal statement to set out my opinion on what I consider to be the key erosion and sediment control matters for this hearing.
- 6 Consistent with my EIC, I have referred to the MacKays to Peka Peka Expressway Project as "the Project" in this rebuttal evidence.

EXECUTIVE SUMMARY

- 7 I have read all of the relevant parts of statements of evidence lodged by submitters. This has not caused me to depart from the opinions expressed in my EIC, and I re-confirm the conclusions reached.
- 8 I respond below to the key erosion and sediment control issues raised through the submitters' evidence; I have not responded to minor issues raised.

Robert van Bentum (KCDC)

- 9 In his evidence, Mr van Bentum states that the Project will generate significant erosion and sediment volumes but notes that he supports the general management approach outlined within the Erosion and Sediment Control Plan (*ESCP*).¹ He states:

“I also support the requirement for site specific sediment and control strategies to be developed ahead of each phase and stage of the work. However I recommend a number of changes to the plan and the addition of consent conditions to provide additional protection.”²

- 10 With reference to the *ESCP*, Mr van Bentum states:

“I support its general approach, and in particular the special attention and protection provided to sensitive environments including the Waikanae River, Te Harakeke/Kawakahia Wetland and its tributaries, the Waimeha Estuary and Wharemauku Stream Estuary.”³

- 11 He confirms that there are a number of other wetlands which also require attention in respect of sediment control. He goes on to identify a number of other wetland environments where he believes enhanced erosion and sediment control measures should be implemented.
- 12 Mr van Bentum recommends the *ESCP* be amended to require hydro seeding and mulching on large cut sand slopes to minimise erosion and sediment loss.⁴
- 13 Mr van Bentum notes that he believes the 95% efficiency for all sediment retention measures is overstated and states that he supports the use of chemical treatment in combination with sediment ponds to ensure consistently high removal of sediment and particularly the clay fraction which contributes to colour. He recommends a modification to the consent conditions that requires all Construction Erosion and Sediment Control Plans (*CESCPs*) include chemical treatment.⁵

Response

- 14 Mr van Bentum does not reference the Universal Soil Loss Equation (*USLE*) provided within my *ESCP* and *EIC*. The basis for his statement that the Project will generate significant volumes of sediment is unclear, particularly when considered in the context of the general support within Mr van Bentum’s evidence for the proposed approach to erosion and sediment control.

¹ Paragraph 3.6 of Mr van Bentum’s evidence.

² Paragraph 3.7 of Mr van Bentum’s evidence.

³ Paragraph 6.1 of Mr van Bentum’s evidence.

⁴ Paragraph 6.4 of Mr van Bentum’s evidence.

⁵ Paragraph 6.7 of Mr van Bentum’s evidence.

- 15 I agree with Mr van Bentum's statement that particular attention needs to be provided to all sensitive environments,⁶ however, I also note that the ESCP does not imply in any way that those environments that are not considered "special" or "sensitive" can receive a lesser degree of attention with respect to erosion and sediment control. The ESCP contains a number of key principles⁷ and practices which must be applied to all erosion and sediment control measures and methodologies. In addition, the methodologies specified within the ESCP are robust and provide, as a minimum, industry best practice with respect to design, implementation and maintenance.
- 16 The CESCPS to be developed are required for each area of works prior to those works commencing and in this regard further specific erosion and sediment control plans will be developed and submitted to GWRC.⁸ As a minimum these CESCPS will meet the requirements of the ESCP. I note that any specific receiving environment values will need to be further addressed within these CESCPS with a full opportunity to "enhance" the erosion and sediment controls if necessary at that time.
- 17 While I acknowledge that enhancements and amendments will likely result to the erosion and sediment control measures through the CESCPS to be developed, I remain of the view that the ESCP represents industry best practice and is comprehensive and complete and will ensure protection of the receiving environments in all cases. I am unclear what specific enhanced erosion and sediment control measures Mr van Bentum refers to or expects (as outlined within paragraph 6.3 of his evidence).
- 18 As for mulch and hydro-seeding, I refer to erosion control principle number 11,⁹ and the specific use of mulch to achieve a stabilised surface in particular for stockpiles and batter establishment. Preload activities will also be subject to this principle. I confirm that I remain of the view that this will provide for both short term erosion protection and dust management. I also note that hydroseeding (as outlined within paragraph 6.4 of Mr van Bentum's evidence) is not considered as a stabilisation measure in itself and simply advances the establishment of a vegetative cover.
- 19 Mr van Bentum questions the efficiency of the proposed sediment control measures, and yet appears to state that he is comfortable with the assessment of sediment yields provided chemical treatment is utilised throughout the Project. As detailed within my EIC, I note that emphasis is placed on erosion control and prevention of

⁶ I note this reflects the evidence of Ms Shona Myers (at paragraph 6.30) on behalf of KCDC which states that there is a need for a higher level of sediment control for the Te Harakeke/Kawakahia wetland areas.

⁷ ESCP pages 6 to 11.

⁸ Proposed Conditions G.28 and E.3.

⁹ ESCP page 9.

sediment generation as a first step.¹⁰ I reiterate the comments I made in my EIC, that the peat replacement trial and chemical treatment investigations both demonstrate the very effective nature of the control measures and provide a large degree of confidence that high sediment removal efficiencies can be obtained.¹¹ I also reconfirm the very high natural infiltration rates that will occur within the sand environments.

- 20 In my opinion, there remains minimal value in chemically treating all discharges from the site as many of these discharges, in particular those within the sand environments, will either not occur or will be of a suitable water quality. The vehicle of the CESC remains as the best option for determining the necessity or otherwise of chemical treatment. This is determined prior to works occurring within specific locations and is also certified by GWRC prior to works commencing.

Dr Death (KCDC)

- 21 Dr Death notes that trout can be especially sensitive to increased sediment and act as an indicator of effects on declining water quality that in turn can be detrimental to indigenous species.¹² In this context he expresses concern that *"The proposed expressway will potentially increase the sediment levels of the Waikanae River"*.
- 22 He also notes a series of specific monitoring parameters related to sedimentation downstream from the Project which he believes are necessary and discusses the need to avoid the migration period of freshwater fish species.¹³
- 23 With respect to stream diversion activities, Dr Death notes concerns about "sediment slugs" when such diversions are activated.¹⁴ In particular, he notes that measures will need to be put in place to ensure that large sediment slugs do not end up in larger receiving waterbodies as these can have more detrimental effects than the constant slow release over a long time period of the same volume of sediment.¹⁵
- 24 Dr Death also highlights what he perceives as a risk of dramatically increased sediment levels in the Waikanae River and in relation to the associated diversion of the Muaupoko Stream which he considers could lead to a decline in ecological condition.¹⁶

¹⁰ My EIC, paragraph 108.

¹¹ ESCP Appendix H.N and ESCP Section 7.12.

¹² Paragraph 3.10 of Dr Death's evidence.

¹³ Paragraph 5.14 of Dr Death's evidence.

¹⁴ Paragraph 6.1 of Dr Death's evidence.

¹⁵ Paragraph 6.1 of Dr Death's evidence.

¹⁶ Paragraph 6.7 of Dr Death's evidence.

Response

- 25 In response to Dr Death's suggestion that there be a condition that requires there be no greater than 20% change in visual clarity to any receiving waterbody,¹⁷ I note that in his rebuttal evidence **Dr Keesing** does not agree that clarity monitoring is required in addition to monitoring for turbidity.¹⁸ He goes on to note that:
- "...a number of the streams within the Project footprint are never clear. The Kakariki and Paetawa Streams and Drain 7 for example are tannin enriched and typically dark. Furthermore, in rain events most of the streams run murky. "
- 26 Further, I note that section 5.3 of the ESCP identifies specific onsite monitoring which will occur with respect to erosion and sediment control measures. Baseline surveys will define the antecedent conditions in the Project area and monitoring during construction will be undertaken to a pre determined schedule.¹⁹ Devices monitoring²⁰ will include the monitoring of onsite construction activities and structures. Triggered response monitoring will be based on a series of triggers as identified within the ESCP²¹ and then a series of actions followed which are also identified within the ESCP.²²
- 27 I remain of the opinion that this monitoring "package" is robust and satisfactory to ensure that adaptive management can occur and that any effects of sediment can be minimised accordingly. I consider that if any triggers are breached, or potential issues identified, that appropriate actions will be implemented to mitigate effects as per the ESCP. This is further supported through the Condition G.40 which requires a full adaptive management approach to the Project in accordance with the Ecological Management Plan (EMP).²³
- 28 The methodologies for the proposed stream diversions are outlined in Section 7.7 of the ESCP. With reference to the "sediment slugs" as referred to by Dr Death, the key methodology items to be considered are that the diversion itself is required to be fully stabilised (geotextile and rip rap suggested) prior to accepting any stream flows. In addition the downstream dam structure is designed to prevent backflow into the channel, and therefore at all times the potential for sediment release from these areas is significantly minimised. I have assisted with the design and implementation of these types of diversions on other projects with success and with minimal sediment release. I have not experienced

¹⁷ Paragraph 5.14 (b) of Dr Death's evidence.

¹⁸ Paragraphs 97-98 of Dr Keesing's rebuttal evidence.

¹⁹ ESCP Section 5.3.2.

²⁰ ESCP Section 5.3.2.

²¹ ESCP page 23.

²² ESCP page 23.

²³ The EMP itself is required under proposed condition G.34.

any "sediment slugs" as suggested by Dr Death and if this circumstance did ever occur I would suggest this is a direct result of poor practice and implementation. I remain of the view that the methodologies and controls in the ESCP will ensure that such an effect will not occur on this Project.

- 29 In response to Dr Death's concern that works in the Waikanae River and the diversion of Muaupoko Stream could generate significant adverse ecological effects, I note that for the Waikanae River works a set of specific plans have been provided,²⁴ further supported by a staged methodology within Section 7.10 of the ESCP. These detail the specific methodologies and sequence of works and will ensure an environmentally robust programme occurs. The proposed Muaupoko Streamworks form part of these details.
- 30 The Muaupoko Stream will be subject to a temporary diversion followed by excavation of a new channel in a "dry" environment. Within the Project there are a number of stream diversions required and in all of these (including the Muaupoko Stream), prior to introducing flows into the new diversion, full stabilisation is required to occur. Further I note that the Muaupoko Stream diversion occurs early in the sequence of works and once operational, will be protected fully from surrounding works with a super silt fence structure.
- 31 My original assessment of the suitability of this methodology remains and I assess the potential for any "sediment slug" to be very low. I also note paragraph 30 of Mr Brian Handyside's evidence (representing GWRC) where he indicates support for this construction methodology approach while confirming the need to address these activities through CESCPS.

Emily Thomson (KCDC)

- 32 Ms Thomson recommends changes to proposed condition G.27 related to the submission of a final ESCP for the Project.²⁵ She suggests:
- 32.1 A 20% change in visual clarity and deposited sediment be included within the condition as a standard to achieve;²⁶
- 32.2 Specific wetland environments be identified as higher risk affording more detailed erosion and sediment control;²⁷ and
- 32.3 Hydroseeding and mulching be incorporated as a specific erosion control measure required for larger sand cut slopes.²⁸

²⁴ Drawings CV CM 500 to 508 within Appendix H.R Management Plan Appendices, Appendix H of CEMP.

²⁵ Paragraph 10.5 of Ms Thomson's evidence.

²⁶ On the basis of Dr Death's evidence, paragraph 6.15(f).

²⁷ On the basis of Mr van Bentum's evidence, paragraph 6.2.

Response

- 33 I have addressed the issue of monitoring in my response to Dr Death but I reiterate that with respect to erosion and sediment control, the ESCP and my EIC outline the specific monitoring requirements for onsite measures and methodologies and I remain comfortable that these are appropriate and sufficient. They represent a monitoring programme whereby adaptive management and ongoing improvements can occur as necessary over the duration of the Project.
- 34 Ms Thomson refers to a visual clarity and deposited sediment percentage change of 20% to any receiving environment as a suitable sediment threshold. I am unsure of the background to this 20% value for this Project, which was suggested in the evidence of Dr Death, and consider that there are no effects or erosion and sediment control rationale to support this. While measuring clarity may assist with monitoring sediment discharge effects, as Dr Keesing confirms, triggers for responses will be difficult unless a good baseline data set is available. While clarity measurement may be undertaken within the Project, I remain of the view that these would need to be targeted to specific environments only. Overall I confirm that the current approach adopted within the ESCP will adequately ensure that sediment is monitored and discharges are minimised throughout.
- 35 Ms Thomson suggests including the specific names of a number of wetland features that require particular emphasis within the proposed consent condition G.27 requiring submission of a new ESCP. I consider that including reference to specific wetland features is appropriate and I accept, from an erosion and sediment control perspective, that this would be helpful for the Project implementation in ensuring these environments afford particular attention. I have included Ms Thomson's suggested amendments, with some changes to receiving environments reference names, to proposed condition G.27(d) in **Annexure A** of this evidence.
- 36 Ms Thomson also suggests an addition to proposed consent condition G.27 where the ESCP must provide for mulch and hydroseeding to be used on larger cut sand slopes. I do not agree with such an inclusion:
- 36.1 Firstly, as outlined in my response to Mr van Bentum above, hydroseeding in itself is not an erosion control measure, and while it would assist with more rapid vegetative growth, it would not be effective in immediately managing erosion of the sand cut areas.
- 36.2 Secondly, flexibility must remain with the erosion control techniques and there may be more effective measures, other than mulch, which can be applied as an erosion control

²⁸ On the basis of Mr van Bentum's evidence, paragraph 6.4.

measure on these slopes. The CESC's will ensure that such provisions apply.

Alton Perrie (GWRC)

- 37 Mr Perrie states that "*Large increases in sediment inputs are predicted to occur to some rivers and streams in the project area.*" He notes the predicted increase within the Waimeha Catchment of 25% and refers to this as a significant increase.²⁹
- 38 Mr Perrie states that "*There appears to be no provision made for water quality monitoring during construction in the draft monitoring plan*" and suggests that it would be appropriate to monitor parameters such as total suspended solids and or turbidity upstream and downstream of significant areas of instream works or earthworks.³⁰

Response

- 39 Mr Perrie is correct in that the USLE calculations show a comparative increase in sediment yields to the Waimeha Catchment of 25%. I emphasise that the USLE is a comparative assessment tool only and it provides a measure of the risk of sediment generation and yields, and assists in identifying controls required for managing this risk to the environment from sediment discharges. As detailed in my EIC, GWRC has also confirmed that the USLE should be used as a risk assessment process rather than a specific sediment yield estimation tool for the purposes of determination of specific effects.³¹
- 40 I also consider that further caution needs to be applied when considering the 25% figure in isolation. The 25% represents a comparative increase from the larger catchment area, from 2.37 tonnes to 2.97 tonnes overall. Effectively the actual estimated tonnage of sediment yield remains low.
- 41 In relation to Mr Perrie's concern about monitoring, I disagree that no provision is being made for water quality monitoring during construction. Monitoring of the specific erosion and sediment control measures is detailed within the ESCP and my EIC.³² This includes ongoing site monitoring by the Project team to ensure that the proposed erosion and sediment control measures have been installed correctly, and that required methodologies are being followed and are functioning effectively throughout the duration of the works.
- 42 Baseline surveys will define the antecedent conditions within the Project area by measuring preconstruction environmental (including ecological) variables. Scheduled monitoring will be undertaken

²⁹ Paragraph 16 of Mr Perrie's evidence.

³⁰ Paragraph 19 of Mr Perrie's evidence.

³¹ Paragraph 41 of my EIC.

³² ESCP Section 5.3 and my EIC paragraphs 86 to 95.

during the construction period and triggered monitoring will occur when pre-determined thresholds are exceeded.

- 43 'Devices' monitoring comprises the monitoring of on-site construction activities, but more particularly the monitoring of on-site structures and devices designed to control the potential adverse effects of those site activities (in particular erosion and subsequent sedimentation). The key purpose of this monitoring is to ensure that all practices, control measures and devices are constructed, operated and maintained so they remain fully effective at all times. The 'Devices' monitoring will act as a trigger for more detailed monitoring or remedial action should this be required. During the undertaking of activities considered higher risk, the monitoring of devices will be undertaken on a daily basis and more frequently during heavy rainfall. This will be undertaken with the checklists provided.
- 44 In the event that adverse impacts on the receiving environments are detected by the ecological monitoring programme, a possible (cause-effect) association with the Project will be investigated and erosion and sediment control measures and methodologies fully investigated and amended as necessary.

Brian Handyside (GWRC)

- 45 Mr Handyside states that he is in:

general agreement with the [Project's] erosion and sediment control approach" and considers "the proposed methodology and measures should generally be appropriate."³³

- 46 He also notes that:

There is a significant level of detail in the application documents and this allows a good appreciation of how the sediment related effects are to be avoided, remedied and mitigated. This approach is supported. I also support the proposal that detailed Construction Erosion and Sediment Control Plans (CESCPs) would subsequently be prepared for individual work areas because this allows focussed methodologies and control measures to be developed and tailored for specific sites and activities. There is depth to the application documents and these have been very helpful when assessing the potential sediment related implications of the project.³⁴

- 47 I also note Mr Handyside's general support for the ESCP when he states:

Appropriately constructed and maintained ponds are generally considered to be the most effective sediment retention measure on earthwork sites. I understand that the project proposes to use rock check dams on sand with the aim of encouraging infiltration to ground; and that decanting earth bunds are proposed where there is underlying peat (and a high water table). Although ponds are the usual mainstay for sediment retention on most earthwork sites, I consider that the proposed rock dams and decanting earth bunds should work satisfactorily on this project

³³ Paragraph 3 of Mr Handyside's evidence.

³⁴ Paragraph 15 of Mr Handyside's evidence.

because of the free draining nature of the underlying sand and the expected rapid deposition of the sand sized particles. In doing so I assume that the free draining sand soil characteristics are not compromised by clogging e.g. with the fine textured sand material.³⁵

- 48 Mr Handyside notes the potential for impeded drainage of the sand soil profile due to the fine sand that may be encountered within the Project. While he states that this could have sediment discharge implications, he goes on to say that it is a maintenance and monitoring issue.³⁶
- 49 With respect to the CESCPS, Mr Handyside suggests that while this approach is supported it is important that all land disturbing activities be addressed by CESCPS.³⁷ He further comments on the use of "Turkey Nests" which are proposed within the Project and notes their unsuitability.³⁸ Turkey Nests are temporary small impoundments which are lined with geotextile material. Water flows through these with sediment retained by the geotextile. It is proposed within the ESCP to utilise these Turkey Nests as part of pumping and the peat replacement methodologies. Mr Handyside's opinion of Turkey's Nests appears to be due to such a control measure not being included within the GWRC Erosion and Sediment Control Guideline.
- 50 Mr Handyside has included an attachment to his evidence within which he addresses some concerns related to overall efficiency of sediment control measures and also provides commentary on the USLE calculations undertaken. Mr Handyside considers an efficiency of 86% is a more accurate sediment control efficiency percentage figure for sediment control measures.³⁹
- 51 USLE outcomes provided by Mr Handyside result in a sediment yield of 40 tonnes which essentially represents a threefold increase from that calculated within the ESCP. No specific calculations to support this outcome were provided. He also comments on the level of uncertainty within the USLE calculations and states a figure of $\pm 25\%$. Mr Handyside notes that he assesses the overall comparative assessment process to not be representative of actual yields on a catchment wide scale and therefore considered that the USLE is not appropriate in this regard.⁴⁰

³⁵ Paragraph 26 of Mr Handyside's evidence. Mr Handyside offers further support for the ESCP approach at paragraph 45 of his evidence.

³⁶ Paragraph 20 of Mr Handyside's evidence.

³⁷ Paragraphs 24 and 52.1 of Mr Handyside's evidence.

³⁸ Paragraph 27 of Mr Handyside's evidence.

³⁹ Attachment A to Mr Handyside's evidence, page 4.

⁴⁰ Paragraphs 47 and 50 of Mr Handyside's evidence.

- 52 As a result of the USLE outcomes provided, Mr Handyside questions the conclusions reached by both Dr Keesing and Dr De Luca on behalf of NZTA.⁴¹
- 53 Mr Handyside places some emphasis on the proposed monitoring programme. He notes that no water quality discharge standards are proposed and suggests a rapid feedback clarity orientated condition could be appropriate for site monitoring purposes.⁴² He notes Section 5.3 of the ESCP where it records that any noticeable change in water clarity from that prior to the rainfall event, or upstream of the site works, as a result of the earthworks activity will result in a review of the erosion and sediment control measures implemented and changes made as necessary.
- 54 Finally, Mr Handyside outlines a number of amendments to the proposed consent conditions.

Response

- 55 Mr Handyside shows general support for the ESCP and the principles and practices within it. He supports the control measures and methodologies including the chemical treatment proposed.⁴³ The five areas of concern as outlined above, appear to be:
- 55.1 Impeded drainage of sand soil profile and therefore impact on sediment control devices;
- 55.2 The use of Turkey Nests as an appropriate sediment retention measure;
- 55.3 The use of 95% as an efficiency figure that will be obtained with respect to sediment retention within sediment control devices;
- 55.4 USLE assumptions and resultant sediment yields; and
- 55.5 Proposed environmental monitoring.

Sand Soil Profile

- 56 The sand-dominant soils within the Project are subject to significant infiltration and can erode relatively easily if surface runoff occurs, but will settle very quickly within a water column. Permeability rates of sand are well recognised as significantly higher than those of clay based soils and within the Project many of these areas are expected to experience minimal runoff at all times. Mr Handyside has expressed concern that this infiltration may be impeded over time. While some compaction may result over time, I assess that the high rates of infiltration can continue to be monitored over time

⁴¹ Paragraphs 49 to 51 of Mr Handyside's evidence.

⁴² Paragraph 48 of Mr Handyside's evidence.

⁴³ ESCP Section 7.12.

and if such a problem eventuates (as Mr Handyside suggests) then maintenance, in the form of removal, or rakings, of the top 20 to 50mm layer of sand, can occur to reintroduce the original drainage pattern. The CESCPS required within proposed Condition E.3 will address this maintenance requirement.

- 57 I note Mr Handyside refers to the control measures in these sand environments as rock check dams.⁴⁴ It is important that these are not confused with the rock check dams within the GWRC Erosion and Sediment Control Guideline which form a different function. Within this Project and the associated ESCP, the control measures are referred to as Rock Filters with the associated design drawings also provided.
- 58 Importantly the Rock Filters are also located within the Project on places of low gradient and this in itself results in large areas within the associated swales where ponding can occur. Therefore if infiltration does become reduced over time in certain locations, significant ponding areas will provide a further "buffer" with infiltration continuing along its length.

Turkey Nests

- 59 With respect to the use of "Turkey Nests" as an erosion and sediment control measure this is a specific measure which, like all erosion and sediment control measures, has an appropriate place within the Project. Mr Handyside seems to suggest that because such a measure is not included within the GWRC Erosion and Sediment Control Guidelines, that it is not appropriate.⁴⁵ Such measures are used on a national basis for pumping activities and can be very effective in managing sediment discharges from a site. As detailed within Section 7.2 of the ESCP, pumping forms a key component of the peat replacement process and in this regard Turkey Nests are proposed. Section 7.9 of the ESCP further details this proposed pumping which includes some 'pre treatment' prior to the discharge. I consider that Turkey Nests should remain as a key control measure within this methodology and while it is expected they will only be used for pumping, should not be limited to this alone. Again the CESCPS will allow for such flexibility (and certification by GWRC) to occur to ensure appropriateness of this as a measure.
- 60 It is unclear why Mr Handyside suggests that Turkey Nests should be supplemented with other control measures such as a sediment retention pond. Given the methodologies provided and the results of the peat replacement trial, I consider this is unnecessary.⁴⁶

⁴⁴ Paragraphs 26 and 29 of Mr Handyside's evidence.

⁴⁵ Paragraph 27 of Mr Handyside's evidence.

⁴⁶ ESCP Section 7.2 and 7.3.

95% efficiency

61 As noted above, Mr Handyside has provided some calculations to demonstrate the 95% sediment control measure efficiency is too high.⁴⁷ He appears to make assumptions about the proposed efficiency of control measures within peat soils, gravels and sand. I am unsure where these assumptions have derived from but they do not appear to take account of the nature of the specific control measure to be used and the use of chemical treatment to be determined through the CЕСP's.

62 As detailed within my EIC,⁴⁸ the ESCP outlines the emphasis which is placed on erosion control and prevention of sediment generation as a first step. The peat replacement trial and chemical treatment investigations both demonstrate the very effective nature of the control measures and provide a large degree of confidence that high sediment removal efficiencies can be obtained.⁴⁹ I also note the very high natural infiltration rates that will occur within the sand environments and, in this regard, my experience confirms that runoff in un-compacted sand locations will be minimal.

63 I note that with respect to sediment control efficiencies, Mr Handyside refers to the Transmission Gully project.⁵⁰ Again I reiterate the completely different nature of that project and its environment from this Project. Mr Handyside acknowledges the different soil types, but importantly other site conditions including slope length and slope angles in particular are also different and there is no sensible comparison that can be made. For example, site grade alone will significantly reduce (or increase) erosion potential with the knowledge that as we double a slope angle, we triple sediment generation from this slope.

64 I remain of the view that 95% is an appropriate efficiency figure that can be achieved overall throughout the Project implementation.

USLE assumptions and sediment yields

65 While USLE calculations have not been provided by Mr Handyside, he has detailed his assumptions and conclusions within his evidence.⁵¹

66 While he agrees with the use of the USLE model as a comparative tool for the Project footprint, from a whole of catchment perspective Mr Handyside suggests that a much higher sediment yield would apply and therefore to undertake a comparative assessment is inaccurate.⁵² It remains a little unclear, but it appears that Mr

⁴⁷ Attachment A to Mr Handyside's evidence.

⁴⁸ My EIC, paragraph 108.

⁴⁹ Appendix H.L of ESCP.

⁵⁰ Paragraph 28 of Mr Handyside's evidence.

⁵¹ Annexure A to Mr Handyside's evidence.

⁵² Paragraph 46 and 47 of Mr Handyside's evidence.

Handyside essentially endorses the USLE as a sediment yield estimation tool and in particular from a pre construction to during earthworks comparison perspective for the Project alone. However, Mr Handyside appears to not support such a comparative approach using USLE on a catchment wide scale.

- 67 For explanation purposes, I confirm that in undertaking the USLE I have used the specific slope classes from within the Project footprint and have simply extrapolated this out to the wider catchment on a pro-rata basis. I have not attempted to assess the wider catchment differences or sediment loads from stream bank and bed erosion. I remain of the view, however, that for comparative purposes only, the USLE remains as a sensible risk assessment tool to allow some appreciation of the percentage increase in sediment yields, on a catchment wide basis, from the Project.
- 68 To undertake an accurate catchment wide sediment yield assessment would require water quality and flow monitoring at the base of the catchment to be undertaken over a long period of time or (as an alternative) a full detailed catchment wide study of land use, slope, soil type and sediment generation and yield modelling. However, for the purposes of comparative assessment only this is not considered necessary.
- 69 Mr Handyside does not appear to provide an alternative comparative assessment tool but instead makes some broad assumptions as to percentage of different land class within the wider catchment and relies on other Project sediment yield information. This includes some detail from the Transmission Gully project.⁵³
- 70 Mr Handyside considers, as an example, that the Wharemauku Catchment sediment yield is 3 times the USLE calculated figure.⁵⁴ If Mr Handyside's assessment is taken as appropriate, this has the effect of reducing the Project footprint sediment yields as a proportion of that overall catchment yield to a percentage increase of less than 2%. While the other catchment areas have not been assessed further, if a similar approach to that suggested by Mr Handyside was taken for these catchments, then the percentage increase of sediment yield from the Project footprint would **reduce** significantly from what is currently calculated and shown within the ESCP.⁵⁵
- 71 Mr Handyside appears comfortable with the pre construction sediment yields and through his own calculations arrives at a similar conclusion. This indicates general support for the USLE calculations provided in my ESCP.⁵⁶

⁵³ Appendix A Mr Handyside's evidence.

⁵⁴ Section 3.1 Appendix A Mr Handyside's evidence.

⁵⁵ Page 14 ESCP.

⁵⁶ Paragraph 38, Section 3.2, Appendix A of Mr Handyside's evidence.

- 72 During the construction phase Mr Handyside also appears comfortable with the factors used within the USLE representing rainfall, length slope factor, cover factor and sediment delivery ratio.⁵⁷ Mr Handyside questions, however, the soil erodibility factor (K factor), erosion control practice factor (P factor), duration of works and sediment control efficiencies. I have discussed the efficiency of the sediment control measures above in my earlier rebuttal evidence.
- 73 The Soil Erodibility Factor, or the K Factor, is a measure of the susceptibility of soil particles to detachment and transport by rainfall and runoff. This is predominantly driven by soil texture however structure, organic matter and permeability also contribute and are taken into account. The preferred method of calculating this factor is the nomograph method whereby the percentage of clay, silts and sands is utilised. Within the ESCP I have calculated the K factor using the soil size fraction analysis undertaken for the Project.
- 74 Mr Handyside has included a percentage of very fine sand (particle size between 0.05 and 0.1mm diameter) within his USLE assumptions (taken from the Project's Technical Report 36) and as a result has adjusted the K factor accordingly. I have been unable to check his calculations as they have not been provided. However, I agree that I have not incorporated this very fine sand component within the K factor used and as a result I have recalculated the sediment yield with adjusted K factors.
- 75 Importantly, Mr Handyside in incorporating this fine sand fraction appears to have made an error and accordingly the K factor should be assessed as 0.3, rather than the 0.41 as he has indicated⁵⁸. The overall implication of this and my revised calculations are discussed in paragraph 80-81 below.
- 76 With respect to the Length Slope (LS) factor,⁵⁹ while Mr Handyside accepts the LS factors utilised, he casts some doubt over the benefits of the use of contour drains as an erosion control factor. I note that the use of contour drains is an accepted practice on all earthworks sites and is a recognised temporary erosion control measure within the GWRC Erosion and Sediment Control Guidelines. This erosion control measure will be utilised on the site and will be a key, pre rain measure installed prior to forecast rain events. Where these are installed a corresponding decrease in erosion of the soil profile will occur.
- 77 The erosion control practice factor, or P Factor, is defined within paragraph 48.5 of my EIC. I have assessed this factor as 0.9 which is representative of a rough irregular surface for the Project

⁵⁷ Section 3.3 Appendix A Mr Handyside's evidence.

⁵⁸ Section 3.2 Appendix A Mr Handyside's evidence.

⁵⁹ Defined in paragraph 48.3 of my EIC.

earthworks footprint. Mr Handyside has assessed the factor as 1.0. The full rationale for his choice of 1.0 is unclear. I remain of the view that 0.9 will represent the soil surface during a rain event and also is reflective of the high infiltration rates of sand that will be encountered.

- 78 Mr Handyside has assessed that the area open at any one time would be a 4 month window. This appears to be based on the overall area of the Project footprint and the overall expected Project duration. It does not appear to take into account the methodologies and in particular the progressive stabilisation that will occur within the Project.
- 79 With respect to the duration of earthworks, I have detailed this within my EIC.⁶⁰ For the purpose of the USLE I have assumed a 2 month window as the expected timeframe prior to stabilisation of that specific area of works. Again I emphasise the use of USLE as a comparative analysis tool only. While the 2 month window is the expected duration of exposed surfaces, there will be times where such periods are reduced or exceeded dependent upon site conditions at that time. If the duration of earthworks exceeds that as assumed within the USLE, there is the ability to manage this through the provision of more progressive stabilisation techniques and the implementation of further measures (such as contour drains) to further reduce slope lengths and reduce sediment yields accordingly. Such details will be provided within the CESCPS to be developed under proposed Condition G.28.
- 80 I have included within **Annexure B** of this rebuttal evidence revised USLE calculation spreadsheets which take account of the revised K factor (for very fine sand) as noted above. I have also reduced slope lengths to 50 metres for the Project which is considered more representative of what can be expected to be implemented within the Project. In doing so, the total sediment yields for the Project footprint are actually further reduced than originally calculated. This is illustrated in **Table 1** below.
- 81 I conclude therefore that the USLE figures provided by Mr Handyside are not representative of the site, and that through good project management and implementation of erosion and sediment control measures, the USLE calculations provided within this rebuttal are more representative of the site. While these calculations are primarily for comparative analysis purposes, I note a small reduction in sediment yields from what was originally calculated within my ESCP.

⁶⁰ Paragraph 52 of my EIC.

Sediment Yield (tonnes) Over a 2 Month Period	Project Footprint Pre Earthworks	Whole Catchment Pre Earthworks	Project Footprint During Earthworks	Whole Catchment Less Project Footprint Pre Earthworks	Whole Catchment Including Earthworks Area	% Increase – Pre Earthworks to Earthworks Whole Catchment
Whareroa	0.11	18.17	0.42	18.06	18.48	1.7
Wharemauku	0.87	38.02	3.38	37.15	40.53	6.6
Waikanae	1.16	644.72	2.99	643.57	646.56	0.3
Waimeha	0.16	2.37	0.60	2.20	2.80	18.1
Ngarara	1.90	50.56	5.19	48.66	53.85	6.5
Totals	4.21	753.84	12.58	749.63	762.22	1.1

Table 1 – Updated USLE Calculations⁶¹

82 **Dr Keesing** and **Dr De Luca** further assess these sediment yields from an effects perspective in their rebuttal evidence.

Proposed Environmental Monitoring

83 With respect to monitoring of the erosion and sediment control measures, Mr Handyside suggests a consent condition requiring water clarity measurements associated with the erosion and sediment control measures and as a result ensuring instant feedback during site monitoring.⁶² With respect to erosion and sediment control, the ESCP and my EIC outline the specific monitoring requirements for onsite measures and methodologies and I remain comfortable that these are appropriate. They represent a monitoring programme whereby adaptive management and ongoing improvements can occur as necessary over the duration of the Project. I also refer to paragraphs 25 above of this rebuttal evidence.

Proposed conditions

84 Mr Handyside suggests a number of amendments to the proposed consent conditions, and I will discuss these next. I attach an amended set of conditions, incorporating those of Mr Handyside's suggestions which I support (see **Annexure A** of this rebuttal evidence).

85 Condition G.28. I agree with the proposed changes.⁶³ The CESCPS are designed to cover this wide range of activities. I note that for a specific activity, such as peat replacement, which is repeated throughout the Project, one CESCPS that covers the general activity may be sufficient. I recommend that a sentence be added to the Advice Note to confirm this scenario. I also accept that removal of the word "stage" is appropriate in the context of the CESCPS.⁶⁴

⁶¹ Table 1 should be considered in comparison to the sediment yield tables on page 14 of my EIC. The key difference between these tables is the reduction within Table 1 of the sediment yields from the Project footprint as a result of the revised USLE calculations. This has a consequential reduction in the whole of catchment sediment yields (including the earthworks footprint), and a reduction in the % increase in sediment yield from pre earthworks to during the construction period.

⁶² Paragraph 52.4 Mr Handyside's evidence.

⁶³ Paragraph 52.1 of Mr Handyside's evidence.

⁶⁴ Paragraph 52.12 of Mr Handyside's evidence.

- 86 Condition E.8(d). I agree with the proposed changes⁶⁵ which reflect a proactive and ongoing maintenance programme.
- 87 New Condition – Turkeys Nest.⁶⁶ For the reasons as detailed earlier, I consider that this condition is not necessary.
- 88 New Condition – Monitoring regarding water clarity.⁶⁷ While it is unclear if Mr Handyside is actually suggesting a new condition, for the reasons detailed earlier, I consider that such a condition is not necessary.
- 89 New Condition – CЕСCP.⁶⁸ I agree with the proposed changes which provide specific reference to determining if chemical treatment is required as part of the CЕСCP preparation process. I have proposed an amendment to Condition E.3(c) to support this. This also supports the existing wording of Condition E.11.
- 90 New Condition – Open Areas.⁶⁹ Based on the USLE calculations provided which demonstrate a comparatively low sediment yield and overall percentage increase in sediment yields, and the associated effects assessment of Dr Keesing and Dr De Luca, I consider such a condition is not necessary. This is further supported by the necessity to undertake progressive stabilisation on the Project as detailed in condition E.3(h).
- 91 New condition – Stabilisation.⁷⁰ This is not considered necessary as it is adequately addressed through the CЕСCPs (Condition E.3), which includes provision for managing non stabilised areas of earthworks, including through progressive stabilisation.
- 92 New Condition – Stabilisation definition.⁷¹ A definition is considered useful for the term stabilisation. However, for the purposes of defining if a surface is stabilised, in my opinion there is no need to have approval or an inspection by the “Manager” as suggested by Mr Handyside. Stabilised is a well understood term and can be assessed as per the definition by any party (including contractors) on the Project. I have proposed wording to be incorporated into an Advice Note associated with Condition E.3.
- 93 New Condition – Storm Monitoring.⁷² This is not considered necessary as it is addressed through Condition E.8.

⁶⁵ Paragraph 52.2 of Mr Handyside’s evidence.

⁶⁶ Paragraph 52.3 of Mr Handyside’s evidence.

⁶⁷ Paragraph 52.4 of Mr Handyside’s evidence

⁶⁸ Paragraph 52.5 of Mr Handyside’s evidence

⁶⁹ Paragraph 52.6 of Mr Handyside’s evidence.

⁷⁰ Paragraph 52.7 of Mr Handyside’s evidence.

⁷¹ Paragraph 52.8 of Mr Handyside’s evidence.

⁷² Paragraph 52.9 of Mr Handyside’s evidence.

- 94 Condition G.11. I agree with the importance of the proposed training and the need to ensure that this is focused and addresses key issues. While the wording suggested by Mr Handyside⁷³ is generally accepted, I recommend some further amendments to his proposed wording as detailed within G.11 of Annexure A.
- 95 Condition G.27 (f).⁷⁴ This is not considered necessary as it is adequately addressed through the existing provisions of Condition G.27. In particular, that condition already requires the compliance with the existing ESCP provisions including progressive stabilisation.
- 96 Condition G.28.⁷⁵ I agree with the removal of the term "stage" from this condition for the reason outlined by Mr Handyside.
- 97 Condition E.1. Mr Handyside suggests a number of amendments to ensure the ESCP is appropriate for the Project.⁷⁶ I consider these changes are unnecessary as the same ESCP is required through Condition G.27 and within that condition the requirements are clearly documented. In particular Condition G.27 includes the need to follow the principles and practices within the current ESCP document. I do however endorse some minor amendments to Condition E.1 for clarity purposes as per Annexure A.
- 98 Condition E.3. I consider that the staging requirements and detailed schedule of construction activities as suggested by Mr Handyside are not necessary.⁷⁷ The existing provisions of Condition E.3 are considered robust enough to ensure that adequate transfer of information and detail is provided to the necessary parties. I do however acknowledge that there needs to be an ability to make amendments to the CESC's, and this needs to be a clear process whereby the ESCP principles still continue to be achieved. I agree with Mr Handyside's recommendation in this regard but with the proviso that such amendments need to be more than a minor change. (For example, if a silt fence is proposed to be moved a few meters with the same function then no additional certification should be required. However if a sediment retention pond is to be removed and replaced with a decanting earth bund, then further certification will be required from the Manager). I propose a change to Condition E.2 to accommodate this recommendation, with no consequential change to Condition E.3 required.
- 99 Condition E.7. I agree with Mr Handyside⁷⁸ that the reference should be to all "erosion and sediment control measures".

⁷³ Paragraph 52.10 of Mr Handyside's evidence.

⁷⁴ Paragraph 52.11 of Mr Handyside's evidence.

⁷⁵ Paragraph 52.12 of Mr Handyside's evidence.

⁷⁶ Paragraphs 52.13 and 52.14 of Mr Handyside's evidence.

⁷⁷ Paragraph 52.15 of Mr Handyside's evidence.

⁷⁸ Paragraph 52.16 of Mr Handyside's evidence.

100 Condition E.8. I do not consider it the role of the Consent Holder to report any non compliance and while these circumstances (if they occur) will be recorded and addressed within the Project documentation, I do not consider it necessary or appropriate to include such an amendment to this condition as suggested.⁷⁹ The conditions clearly outline the requirements for the consent holder and should those requirements not be met, then it is a non-compliance issue and will be considered as such by Council through its compliance monitoring programme.

Richard Percy (GWRC)

101 Mr Percy refers to Mr Handyside's evidence and in particular references the need to address the effects on the freshwater and marine receiving environment.⁸⁰ This is in particular reference to the USLE calculations as provided by Mr Handyside. Mr Percy also makes reference to the efficiency of the sediment control devices referred to within the ESCP.⁸¹

Response

102 I have responded to the above matters in my response to Mr Handyside's evidence.

103 Mr Percy suggests a number of amendments to the proposed consent conditions. As not all of the suggested amendments are clear, I respond below to key amendments. I also set out my suggested amendments to the proposed conditions in **Annexure A** to this rebuttal evidence.

104 Condition G.27. Mr Percy suggests a number of formatting and grammatical changes to the condition.⁸² I agree with these changes as they have no fundamental bearing on the intent of the condition.⁸³ I do not however consider it necessary to expand on the technical information to be provided within the ESCP or to detail the guideline documents to be followed as Mr Percy suggests. There is already a linkage between this condition and Condition E.1 which requires submission and implementation of an ESCP. This contains a lot of detail and also reference to the guidance documents as appropriate. In addition, the existing draft ESCP contains a significant amount of information and design details which will likely be repeated within the ESCP.

105 I do not agree with a 20 working day timeframe for submission of the ESCP. 15 working days is considered appropriate for GWRC to engage expertise if necessary and to review and provide any comments associated with the ESCP. This again is in recognition

⁷⁹ Paragraph 52.17 of Mr Handyside's evidence.

⁸⁰ Paragraphs 83-84 of Mr Percy's evidence.

⁸¹ Paragraph 92 of Mr Percy's evidence.

⁸² Page 26 of Mr Percy's evidence.

⁸³ Refer Annexure A for suggested amendments.

that a significant amount of design and detail exists within the ESCP already submitted which has already been reviewed in detail by GWRC.

- 106 I disagree with Mr Percy that reference to the NZTA Environmental Plan be deleted from Condition G.27. This is an overarching document which provides the basis for the overall environmental approach and principles of NZTA to erosion and sediment control and as such provides an important guidance document.⁸⁴
- 107 Condition G.28. Mr Percy suggests a number of formatting and grammatical changes to the condition.⁸⁵ I agree with these changes as they have no fundamental bearing on the intent of the condition and assist with the clarification and overall understanding. I am unsure why Mr Percy requests removal of the Advice Note. I consider this should remain as it provides a key linkage back to the current ESCP document.
- 108 Conditions E.1 and E.2. Mr Percy suggests deletion of these conditions and advice notes.⁸⁶ Mr Percy notes that the content is already covered within Condition G.27 and G.28. However, I consider that the conditions are important as standalone conditions to ensure the earthworks provisions are clear. I am comfortable that, provided consistency remains between these conditions (E.1/E.2 and G.27/G.28), they are appropriate. I consider that the other documents that Mr Percy references are already detailed within condition E.1 (and I have commented on the suggested deletion of the NZTA's Environmental Plan in relation to G.27 above). I also endorse some minor amendments to Condition E.1 and E.2 for clarity purposes as per Annexure A.
- 109 Condition E.3.⁸⁷ As I explained earlier at paragraph 98, I consider that the staging requirements and detailed schedule of construction activities are not necessary.
- 110 Condition E.4. Mr Percy suggests a number of changes to this condition.⁸⁸ I accept these changes as appropriate.
- 111 Condition E.7. I agree with Mr Percy's suggested change⁸⁹ related to the reference to all control measures. However I disagree with the suggestion that 10 working days notice is required and that approval of the Manager is required. The time period in the condition is the specified timeframe for informing GWRC of removal of erosion and sediment control measures. 2 working days is

⁸⁴ Refer to Appendix H.O of ESCP.

⁸⁵ Page 26 of Mr Percy's evidence.

⁸⁶ Pages 30 and 31 of Mr Percy's evidence.

⁸⁷ Page 31 of Mr Percy's evidence.

⁸⁸ Page 31 of Mr Percy's evidence.

⁸⁹ Page 31 of Mr Percy's evidence.

considered appropriate to allow GWRC to act accordingly on the notification of such intent to remove any erosion and sediment control measures. As the condition specifies, if the stage or subcatchment area is not stabilised or is not in accordance with the CЕССP,⁹⁰ then control measure removal cannot occur as per the condition. No formal decision or approval from GWRC is therefore required and 2 days notice is considered adequate.

- 112 Condition E.8. I agree with the minor amendments suggested.⁹¹ However, I consider there is no need to include performance standards, conditions detailing the adaptive management regime or reporting of non compliance. These aspects are already addressed within the CЕССPs and the ecological monitoring and reporting required by other conditions of consent.⁹²
- 113 Condition E.9. Mr Percy suggests a number of amendments that provide specific items to be addressed in the event of a discharge covered by proposed condition E.9.⁹³ I consider these additions unnecessary. The response to any such discharge is totally dependent upon the nature of the storm event and the associated discharge itself. It is not considered practical to try and predetermine these aspects.
- 114 Condition E.10. Mr Percy suggests all aspects of the site should be subject to at least weekly monitoring and inspection.⁹⁴ I agree with this as a general best practice and that the inspections will not be limited to haul roads. With ongoing activities on the site, such a frequency of monitoring will occur by default. I propose a change of condition wording to reflect that all working stages of the site will be subject to weekly inspections as a minimum.
- 115 Condition E.11. While the general amendments suggested are considered appropriate, I consider that the need to state when chemical treatment will be implemented is not necessary.⁹⁵ The CЕССPs are designed to specifically identify if chemical treatment is required and, if so, how such a process will occur. It is not until these CЕССPs are developed that there will be the opportunity to determine if such chemical treatment is required. I agree with Mr Percy that the condition needs to state that any amendments to the CTP shall be submitted (not approved) a number of days before implementation. However I disagree with the 10 day duration suggested. I propose a 5 day duration as this is considered adequate time to allow Manager consideration. It will also ensure

⁹⁰ Refer to Condition E.3 (m) re CЕССP.

⁹¹ Page 31 of Mr Percy's evidence.

⁹² For example Condition E.3 (j), E.8, E.9 and G.34 to G.40.

⁹³ Page 32 of Mr Percy's evidence.

⁹⁴ Page 32 of Mr Percy's evidence.

⁹⁵ Page 32 of Mr Percy's evidence.

consistency with Condition G.28 as outlined earlier in this rebuttal evidence.

- 116 General New Conditions. Finally, I note that Mr Percy identifies a number of areas where further conditions may be required.⁹⁶ I have not provided any further comment on these except to note that many of the items identified are already addressed within existing conditions and within existing proposed amendments. I have taken this position due to the lack of detail provided to enable assessment of what is actually proposed by Mr Percy.
- 117 I note however that the discharge of treated cement contaminated water as raised by Mr Percy, was addressed through the ESCP and my EIC. With respect to cement contamination from concrete works, it is important to recognise that there is no intention within the Project to discharge such a contaminant directly into the receiving environment. Treatment of cement runoff is specifically outlined and includes the use of housekeeping practices, discharging through appropriate filter facilities or direct removal from the site via sucker truck. Dedicated concrete wash facilities will be established on site as required. Further to this and, if necessary, any discharges on site will be discharged only after treatment through treatment tanks and bark filled filter socks with pH checked prior to discharge to the stream environment. I note the while this detail will again be included within the ESCP, there were no specific conditions related to this discharge. I have therefore recommended an addition to Condition E.3 which provides specific reference to this discharge and requires the submission of the details of the treatment of any contaminated discharge, other than sediment, and in particular that associated with cement. **Annexure A** now contains this recommended condition.

CONCLUSION

- 118 In my opinion, the submitters' evidence has not raised any valid concerns regarding the assessment of effects related to erosion and sediment control, nor the overall management approach provided in the ESCP to address these effects. Where issues such as the USLE have been discussed within submitters' evidence,⁹⁷ I remain of the view that I have assessed the erosion and sediment control aspects correctly and appropriately for the Project to enable effects to be assessed.
- 119 As detailed above, I have accepted a number of amendments to the proposed conditions suggested by submitters. The further amendments to conditions which I agree with and now propose are shown in **Annexure A**.

⁹⁶ Page 33 of Mr Percy's evidence.

⁹⁷ Evidence of Mr Handyside.

120 I note the evidence of Mr Handyside and the further issues he has raised. All of these items are considered to have been addressed and adequately considered within the ESCP, my EIC and this rebuttal evidence.

A handwritten signature in black ink that reads "G.J. Ridley". The signature is written in a cursive style with a large, prominent 'R'.

Graeme Ridley
25 October 2012

ANNEXURE A – PROPOSED CONDITIONS REFERRED TO IN THIS REBUTTAL STATEMENT

Further changes I am proposing to conditions are shown in underline for additions and ~~striketrough~~ for deletions.

Staff Training	
G.11	<p>The consent holder shall ensure that earthworks contractors <u>personnel</u> responsible for supervising <u>earthworks</u> site staff i.e. foremen, supervisors and managers shall undergo environmental awareness training, required by the CEMP. This training shall occur prior to the commencement of any earthworks or earthworks stage and shall be given by a suitably qualified and experienced person certified by the Manager to deliver a practical on-site training session. Specifically, contractors shall be briefed as follows <u>training shall include but not be limited to:</u></p> <ul style="list-style-type: none"> a) Contractors likely to be involved in the construction and maintenance of erosion and sediment control devices shall receive training on the performance standards <u>Design details for the erosion and sediment control devices and associated methodologies; and</u> b) Contractors likely to be involved in the construction Details of any stream diversions or other in-stream works or wetlands, shall be briefed <u>briefing on the values of the streams and wetlands, the objectives of for stream and culvert design and construction erosion and sediment control measures</u>, the requirements of native fish for fish passage, and the sensitivity of the receiving environment to sediment discharges; c) Contractors <u>For supervisory and management personnel</u> likely to be involved in any works involving vegetation clearance, shall be briefed <u>briefing on the values of any significant areas of vegetation that are to be retained, and the methods that shall be used to identify and protect them during construction; and</u> d) All contractors shall be briefed <u>Briefing</u> on the requirements of Te Ati Awa ki Whakarongotai and Takamore Trust for cultural ceremonies to occur before the commencement of works. <p><u>The environmental awareness training shall include a process and programme for training of new staff members joining the project team, and for any staff moving to a new CESP area within the project. This environmental awareness training shall continue for the duration of the project earthworks.</u></p>
Erosion and Sediment Control Management Plan	
G.27	<p>The consent holder shall finalise, submit and implement through the CEMP, an Erosion and Sediment Control Management Plan (ESCP) to be submitted to the Manager for certification at least 15 working days prior to works commencing in accordance with Condition E.1.</p>

	<p>The purpose of the ESCP is to describe the methods and practices to be implemented to minimise, <u>avoid, remedy or mitigate</u> the effects of sediment generation and yield on the aquatic receiving environments associated with the Project. In addition, the ESCP shall:</p> <ol style="list-style-type: none"> a) Outline the principles that the ESCP shall seek to adhere to; b) Be developed in accordance with the objectives outlined in NZTA's Environmental Plan, including; c) Ensuring <u>Ensure</u> construction and maintenance activities avoid, remedy or mitigate effects of soil erosion, sediment run-off and sediment deposition; d) Identify areas susceptible to erosion and sediment deposition and implement erosion and sediment control measures appropriate to each situation with particular emphasis on high-risk areas, <u>including El Rancho Wetland (Weggery), Raumati Manuka Wetland (between Poplar Avenue and Raumati Road), Southern Otaihanga Wetland and the Northern Otaihanga Wetland (adjacent to Otaihanga Landfill); and</u> e) Use bio-engineering and low-impact design practices where practicable. <p><u>Works shall not commence until the consent holder has received the Manager's written certification for the ESCP.</u></p> <p><i>Advice Note: This ESCP shall follow the principles and practices as outlined within and be consistent with the ESCP, Appendix H of the CEMP.</i></p>
G.28	<p>The consent holder shall prepare, submit and implement through the CEMP, site specific Construction [stage] Erosion and Sediment Control Plans (CESCP), <u>for all land disturbing activities including streamworks,</u> to be submitted to the Manager for certification at least 5-10 days prior to work commencing in that site. The purpose of the CESCP is to allow the consent holder and GWRC to further develop methodologies to be implemented throughout the duration of the project to address the specific characteristics of various sites along the route. In addition, the CESCP shall:</p> <ol style="list-style-type: none"> a) The CESCP will Be consistent with the CEMP as required for G.20 and the ESCP as required for G.27 and E.1. b) <u>Ensure that any more than minor</u> changes to the CESCP shall be approved <u>certified</u> by the Manager prior to the amendment being implemented <u>in accordance with Condition E.2.</u> <p>The CESCP will be consistent and in accordance with the CEMP as required for G.20 and the ESCP as required for G.27 above. <u>Reference shall also be made to Condition E.3 for CESCP details.</u></p> <p><u>Works shall not commence until the consent holder has received the Manager's written certification for the CESCP.</u></p>

	<p>Advice Note: <i>These CESCPS will be developed within the context of the principles and practices of the ESCP and will allow for innovation, flexibility and practicality of approach to erosion and sediment control. The CESCPS will also ensure ongoing adaption to changing conditions throughout the project lifetime. <u>Where activities may be repeated throughout the site, such as peat replacement, then one CESCPS may be developed which will cover the ongoing implementation of such activities and without the need to develop ongoing and repeat CESCPS for certification.</u></i></p>
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Erosion and Sediment Control	
E.1	<p>The consent holder shall finalise, submit and implement through the CEMP, an Erosion and Sediment Control Management Plan (ESCP) to be submitted to the Manager for certification at least 15 working days prior to works commencing.</p> <p>Advice Note: <i>Erosion and sediment control measures shall be constructed and maintained in accordance with the NZTA's Draft Erosion and Sediment Control Standard for State Highway Infrastructure and Draft Field Guide for Contractors (and any subsequent amendments to that document that occur after this consent is granted and prior to the commencement of construction), except where a higher standard is detailed in the ESCP referred to in Condition 0 and E.1, in which case the higher standard shall apply.</i></p>
E.2	<p>The consent holder shall prepare, submit and implement through the CEMP, site specific Construction [stage] Erosion and Sediment Control Plans (CESCPs) to be submitted to the Manager for certification at least 10 <u>5</u> days prior to work commencing in that site. The CESCPs shall be prepared in consultation with Te Ati Awa ki Whakarongotai and Takamore Trust.</p> <p><u>Where a more than minor change to the CESCPS is required, the consent holder may request amendments to any CESCPS by submitting the amendments in writing for the certification of the Manager. Any amendments to a given CESCPS shall ensure that the plan will continue to meet the purpose and objectives as outlined in G.28 to the satisfaction of the Manager.</u></p> <p><u>Works shall not commence until the consent holder has received the Manager's written certification for the CESCPS.</u></p>

E.3	<p>The CESCPS shall meet the purpose in Condition G.28 and include, but need not be limited to:</p> <ul style="list-style-type: none"> a) Contour information at suitable intervals; b) Erosion and sediment control measures including specific pond design (including calculations supporting pond sizing); c) <u>Determination of the requirement for chemical</u> Chemical <u>treatment and if required the associated design and details;</u> d) Catchment boundaries for the erosion and sediment control measures; e) Location of the Work, and cut and fill operations; f) Details of construction methods to be employed, including timing and duration; g) Design details including: <ul style="list-style-type: none"> i. Contributing catchment area; ii. Retention volume of structure (dead storage and live storage measured to the top of the primary spillway); iii. Shape of structure (dimensions of structure); iv. Location of flood waters v. Safety and access vi. Position of inlets/outlets vii. Stabilisation of the structure; and viii. Maintenance. h) A programme for managing non-stabilised areas of earthworks, including progressive stabilisation considerations; i) The identification of appropriately qualified and experienced staff to manage the environmental issues onsite; j) The identification of staff who have clearly defined roles and responsibilities to monitor compliance with the Consent Conditions and the ESCP; k) The role of Te Ati Awa ki Whakarongotai and the Takamore Trust in monitoring; l) Provision of details of a chain of responsibility for managing environmental issues and details of responsible personnel; and m) Methods and procedures to be undertaken for decommissioning of erosion and sediment control measures <u>including chemical treatment devices.</u> n) <u>Methods, design details and procedures for managing the discharge of contaminants with a particular focus on that associated with cement contamination.</u> <p><i><u>Advice Note: For the purpose of this condition stabilisation shall mean making an area resistant to erosion. This may be achieved by using indurated rock or through the application of basecourse, grassing, or mulch. Where seeding or grassing is used on a surface that is not otherwise resistant to erosion, the surface is considered stabilised once 80% vegetative ground cover has been established over the entire area. "Non stabilised" areas are those which do not meet the definition of "stabilised".</u></i></p>
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E.4	<p>Prior to any earthworks commencing within a site <u>each area of works</u> (other than those required to establish erosion and sediment control measures), a certificate signed by an appropriately qualified and experienced sediment control practitioner shall be submitted to GWRC <u>the Manager</u> to certify that the erosion and sediment control measures (<u>including clean and dirty water diversion channels, silt fences, decanting earth bunds, sediment retention ponds, rock filters and chemical treatment systems</u>) for that site <u>area of works</u> have been constructed in accordance with the relevant CESC.</p> <p><u>The certificate is to be provided to the Manager 2 working days prior to the commencement of construction in that area of works.</u></p>
E.5	<p>A copy of the “as-built(s)” and the certified CESC’s shall be kept on site, and all erosion and sediment control measures (including staging boundaries and particularly the extent of exposed areas) shall be updated as soon as practicable as changes are made. As-built plans shall be prepared by a suitably qualified person and shall be accompanied by text detailing the relevant earthworks methodology, constraints and likely progressions, and shall be revised as required to enable clear interpretation as to the day-to-day operation and management of erosion and sediment control measures, provided that such revisions are in general accordance with the CESC’s.</p>
E.6	<p>All necessary perimeter controls for a site or stage shall be operational before earthworks (or relevant stage of earthworks) within the site or stage commence.</p>
E.7	<p>No sediment retention ponds, chemical treatment systems or perimeter controls <u>erosion and sediment control measures</u> shall be removed or decommissioned from a site, or stage before the entire area is stabilised, unless such removal and decommissioning is in accordance with the CEMP or a CESC, and the Manager has been informed not less than 2 working days prior.</p>
Erosion and Sediment Control Monitoring	
E.8	<p>The Consent Holder shall carry out monitoring in accordance with the ESCP and the certified CESC and which will seek to <u>shall</u> ensure that:</p> <ol style="list-style-type: none"> a) The proposed erosion and sediment control measures have been installed <u>properly in accordance with the certified CESC</u>; b) Methodologies are carried out properly; and c) Erosion and sediment control measures are functioning <u>properly in accordance with the certified CESC</u> effectively throughout the duration of the project; and d) <u>The sediment discharge implications of any impeded drainage to ground, such as by deposition of fine sand, should be a particular focus of site control monitoring, with appropriate remedial action taken as required.</u>

E.9	<p>In the event of either a failure of erosion and sediment control devices or where a storm event exceeds the design volume of the device, and where the discharge is to a perennial or intermittent freshwater body, wetland or estuarine/marine environment, a suitably qualified ecologist(s) shall be notified within 24 hours, who shall then inspect the relevant area to determine whether significant adverse effects on the affected area's ecological values have occurred.</p> <p>The Project's Environmental Manager shall, in consultation with Te Ati Awa ki Whakarongotai and the Takamore Trust, prepare a report on the effects of the failure and any recommended measures that may be required to remedy the effects; the report shall be submitted to the Manager for approval within 5 working days of the event.</p> <p>The remedial measures shall be implemented within 10 working days of the approval of the Manager.</p>
E.10	<p>The consent holder shall carry out weekly inspections <u>at a minimum frequency of weekly</u>, of all site-haul roads <u>working areas of the site</u> in order to ensure they are well maintained and that erosion and sediment control devices remain effective.</p>
Chemical Treatment (Flocculation)	
E.11	<p>a) Prior to the commissioning of chemical treatments for sediment management purposes, the Consent Holder shall provide CWRC <u>the Manager</u> with a Chemical Treatment Plan (CTP) for each site, or stage of the works, or in association with an CESC, at least 10 <u>5</u> working days before the commencement of flocculation works.</p> <p>b) The CTP shall be submitted to the Manager for certification that the proposed use of chemical flocculation will assist in achieving appropriate sediment removal efficiencies in accordance with the principles of the ESCP.</p> <p>c) Each CTP shall include, but need not be limited to:</p> <ul style="list-style-type: none"> i) Specific design details of the chemical treatment system; ii) Monitoring, maintenance (including post-storm) and contingency programme (including a Record Sheet); iii) Details of optimum dosage (including catchment specific soil analysis and assumptions); iv) Procedures for carrying out an initial treatment trial; v) A spill contingency plan; vi) A performance monitoring plan; and vii) Details of the person or bodies that will hold responsibility for the maintenance of the chemical treatment system and the organisational structure which will support the system. <p>d) Any amendments to a CTP shall be approved by <u>submitted to the Manager</u> at least 10 <u>5</u> working days prior to implementation.</p> <p><u>Works shall not commence until the consent holder has received the Manager's written certification for the CTP.</u></p>

	<p><i>Advice Note: The CTP will demonstrate the nature of soils within which the works are to occur and, through the necessary bench testing and settleability analysis, will determine the need for chemical treatment or not. This will be reflected within the CESCPS submitted for certification to the Manager.</i></p>
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ANNEXURE B – REVISED USLE CALCULATION SPREADSHEETS

USLE Calculation M2PP During Earthworks - Project Footprint - October 2012 - Rebuttal

Catchment 1	Whareroa	1600
Catchment 2	Wharemauku	1380
Catchment 3	Waikanae	14200
Catchment 4	Waimeha	120
Catchment 5	Ngarara	1690

Total Catchment Area (ha)

Assumptions

R factor based on NIWA HIRDS data

K Factor based on soil samples and soils /gravels to be utilised - sand fine fraction also taken into account

LS Factor based on different slopes with a uniform 100m slope length with a contour drain installed to break the slope length (flow path) to a maximum of 50m

C and P Factors based on a bare site which has a rough and irregular surface

Duration - for purposes of risk assessment has been based on 2 months total for each stage however staging and progressive stabilisation will occur.

Sediment Delivery Ratio - based on a high infiltration rate and irregular surface capturing flow and sediment - 0.25 assumed figure

Efficiency - based on 95% due to control measures exceeding guidelines and chemical treatment - all measures considered of equal efficiency

CATCHMENT #	Footprint hectares	r	k	ls	c	p	time	sdr	sed eff.	Yield	Overall Footprint Yield	Area	Project Footprint Area	Pro Rata Total Catchment Area	Slope % Total Catchment	Total Catchment Less Project Footprint	Pro Rata Total Catchment Area		
1	Area 1																		
	Slope 0-5%	6.66	71	0.396	0.2808282	1	0.9	0.16	0.25	0.95	0.094654443				1095.034528	0.74	1088.374528		
	Slope 5-10%	1.44	71	0.396	1.1610704	1	0.9	0.16	0.25	0.95	0.084614948				236.7642223	0.16	235.3242223		
	Slope 10-20%	0.54	71	0.396	3.2801914	1	0.9	0.16	0.25	0.95	0.089643538				88.78658336	0.06	88.24658336		
	Slope >20%	0.36	71	0.396	5.2269822	1	0.9	0.16	0.25	0.95	0.095231267		9		59.19105557	0.04	58.83105557	1479.776389	
	Area 2																		
	Slope 0-5%	0.5122	71	0.5016	0.2808282	1	0.9	0.16	0.25	0.95	0.009220802				84.21571851	0.700492341	83.70351851		
	Slope 5-10%	0.0592	71	0.5016	1.1610704	1	0.9	0.16	0.25	0.95	0.004406245				9.73364025	0.080962801	9.67444025		
	Slope 10-20%	0.0596	71	0.5016	3.2801914	1	0.9	0.16	0.25	0.95	0.012532388				9.799408089	0.081509847	9.739808089		
	Slope >20%	0.1002	71	0.5016	5.2269822	1	0.9	0.16	0.25	0.95	0.033574312	0.423877943	0.7312	9.7312	16.4748438	0.137035011	16.3746438	120.2236107	
2	Area 1																		
	Slope 0-5%	4.426	71	0.396	0.2808282	1	0.9	0.16	0.25	0.95	0.062903988				192.9147369	0.471121708	188.4887369		
	Slope 5-10%	0.689	71	0.396	1.1610704	1	0.9	0.16	0.25	0.95	0.040485902				30.03123673	0.073340004	29.34223673		
	Slope 10-20%	1.5453	71	0.396	3.2801914	1	0.9	0.16	0.25	0.95	0.256529926				67.35452847	0.16448811	65.80922847		
	Slope >20%	2.7361	71	0.396	5.2269822	1	0.9	0.16	0.25	0.95	0.723784085		9.3964		119.2575716	0.291241777	116.5214716	409.4796176	
	Area 2																		
	Slope 0-5%	0.5863	71	0.3036	0.2808282	1	0.9	0.16	0.25	0.95	0.006388417				25.54998721	0.188387636	24.96368721		
	Slope 5-10%	0.2276	71	0.3036	1.1610704	1	0.9	0.16	0.25	0.95	0.010253295				9.918432695	0.073131547	9.690832695		
	Slope 10-20%	0.4838	71	0.3036	3.2801914	1	0.9	0.16	0.25	0.95	0.061574044				21.08320623	0.155452734	20.59940623		
	Slope >20%	1.8145	71	0.3036	5.2269822	1	0.9	0.16	0.25	0.95	0.367993898		3.1122		79.07291795	0.583028083	77.25841795	135.6245441	
	Area 3																		
	Slope 0-5%	2.8566	71	0.3036	0.2808282	1	0.9	0.16	0.25	0.95	0.031125962				124.4859176	0.90338699	121.6293176		
	Slope 5-10%	0.0312	71	0.3036	1.1610704	1	0.9	0.16	0.25	0.95	0.001405548				1.359644552	0.009866861	1.328444552		
	Slope 10-20%	0.1189	71	0.3036	3.2801914	1	0.9	0.16	0.25	0.95	0.015132604				5.181465938	0.037601594	5.062565938		
	Slope >20%	0.1554	71	0.3036	5.2269822	1	0.9	0.16	0.25	0.95	0.031516259		3.1621		6.772075751	0.049144556	6.616675751	137.7991038	
	Area 4																		
	Slope 0-5%	0.3701	71	0.3036	0.2808282	1	0.9	0.16	0.25	0.95	0.004032668				16.12834772	0.547890452	15.75824772		
	Slope 5-10%	0.0062	71	0.3036	1.1610704	1	0.9	0.16	0.25	0.95	0.000279308				0.270185776	0.009178386	0.263985776		
	Slope 10-20%	0.0343	71	0.3036	3.2801914	1	0.9	0.16	0.25	0.95	0.004365419				1.49473744	0.050777202	1.46043744		
	Slope >20%	0.2649	71	0.3036	5.2269822	1	0.9	0.16	0.25	0.95	0.053723661		0.6755		11.54390519	0.39215396	11.27900519	29.43717612	
	Area 5																		
	Slope 0-5%	0.0402	71	0.3036	0.2808282	1	0.9	0.16	0.25	0.95	0.000438026				1.751849712	0.128025478	1.711649712		
	Slope 5-10%	0.0066	71	0.3036	1.1610704	1	0.9	0.16	0.25	0.95	0.000297328				0.287617117	0.021019108	0.281017117		
	Slope 10-20%	0.0646	71	0.3036	3.2801914	1	0.9	0.16	0.25	0.95	0.008221751				2.815161477	0.205732484	2.750561477		
	Slope >20%	0.2026	71	0.3036	5.2269822	1	0.9	0.16	0.25	0.95	0.041088765		0.314		8.828973919	0.64522293	8.626373919	13.68360222	
	Area 6																		
	Slope 0-5%	0.1491	71	0.3036	0.2808282	1	0.9	0.16	0.25	0.95	0.001624617				6.497532139	0.203105844	6.348432139		
	Slope 5-10%	0.323	71	0.3036	1.1610704	1	0.9	0.16	0.25	0.95	0.014551029				14.07580738	0.439994551	13.75280738		
Slope 10-20%	0.1127	71	0.3036	3.2801914	1	0.9	0.16	0.25	0.95	0.01434352				4.911280161	0.153521319	4.798580161			
Slope >20%	0.1493	71	0.3036	5.2269822	1	0.9	0.16	0.25	0.95	0.030279134		0.7341		6.506247809	0.203378286	6.356947809	31.99086749		
Area 7																			
Slope 0-5%	0.2967	71	0.3036	0.2808282	1	0.9	0.16	0.25	0.95	0.00323289				12.92969675	0.296967271	12.63299675			
Slope 5-10%	0.0719	71	0.3036	1.1610704	1	0.9	0.16	0.25	0.95	0.003239068				3.133283439	0.071964768	3.061383439			

Area 16															
Slope 0-5%	0.6664	71	0.3036	0.2808282	1	0.9	0.16	0.25	0.95	0.007261199		17.73015658	0.597079115	17.06375658	
Slope 5-10%	0.1529	71	0.3036	1.1610704	1	0.9	0.16	0.25	0.95	0.006888088		4.068038627	0.136994893	3.915138627	
Slope 10-20%	0.2198	71	0.3036	3.2801914	1	0.9	0.16	0.25	0.95	0.027974318		5.847971814	0.196935758	5.628171814	
Slope >20%	0.077	71	0.3036	5.2269822	1	0.9	0.16	0.25	0.95	0.015616164	1.1161	2.048652546	0.068990234	1.971652546	29.69481957
Area 17															
Slope 0-5%	11.1025	71	0.3036	0.2808282	1	0.9	0.16	0.25	0.95	0.120974584		295.3917519	0.784523633	284.2892519	
Slope 5-10%	1.2694	71	0.3036	1.1610704	1	0.9	0.16	0.25	0.95	0.057185994		33.77350055	0.089698203	32.50410055	
Slope 10-20%	1.1628	71	0.3036	3.2801914	1	0.9	0.16	0.25	0.95	0.147991522		30.93731403	0.082165646	29.77451403	
Slope >20%	0.6172	71	0.3036	5.2269822	1	0.9	0.16	0.25	0.95	0.125172683	14.1519	16.42114742	0.043612518	15.80394742	376.5237139
Area 18															
Slope 0-5%	5.4906	71	0.5016	0.2808282	1	0.9	0.16	0.25	0.95	0.098843683		146.0822295	0.788550748	140.5916295	
Slope 5-10%	0.4638	71	0.5016	1.1610704	1	0.9	0.16	0.25	0.95	0.034520548		12.33980586	0.066610177	11.87600586	
Slope 10-20%	0.4787	71	0.5016	3.2801914	1	0.9	0.16	0.25	0.95	0.100658627		12.73623343	0.06875009	12.25753343	
Slope >20%	0.5298	71	0.5016	5.2269822	1	0.9	0.16	0.25	0.95	0.177521664	6.9629	14.09579375	0.076088986	13.56599375	185.2540625
Area 19															
Slope 0-5%	6.3419	71	0.5016	0.2808282	1	0.9	0.16	0.25	0.95	0.114169081		168.7318128	0.903005795	162.3899128	
Slope 5-10%	0.3299	71	0.5016	1.1610704	1	0.9	0.16	0.25	0.95	0.024554396		8.777278896	0.046973559	8.447378896	
Slope 10-20%	0.2865	71	0.5016	3.2801914	1	0.9	0.16	0.25	0.95	0.060243778		7.622583824	0.040793951	7.336083824	
Slope >20%	0.0648	71	0.5016	5.2269822	1	0.9	0.16	0.25	0.95	0.021712729	7.0231	1.724060844	0.009226695	1.659260844	186.8557363
Area 20															
Slope 0-5%	0.6919	71	0.3036	0.2808282	1	0.9	0.16	0.25	0.95	0.007539051		18.40860645	0.664840972	17.71670645	
Slope 5-10%	0.235	71	0.3036	1.1610704	1	0.9	0.16	0.25	0.95	0.010586662		6.252381147	0.225809551	6.017381147	
Slope 10-20%	0.0904	71	0.3036	3.2801914	1	0.9	0.16	0.25	0.95	0.011505361		2.405171301	0.08686461	2.314771301	
Slope >20%	0.0234	71	0.3036	5.2269822	1	0.9	0.16	0.25	0.95	0.004745691	1.0407	0.622577527	0.022484866	0.599177527	27.68873643
Area 21															
Slope 0-5%	1.6663	71	0.5016	0.2808282	1	0.9	0.16	0.25	0.95	0.02999731		44.33337322	0.519533564	42.66707322	
Slope 5-10%	0.5562	71	0.5016	1.1610704	1	0.9	0.16	0.25	0.95	0.041397863		14.79818891	0.173416893	14.24198891	
Slope 10-20%	0.6075	71	0.5016	3.2801914	1	0.9	0.16	0.25	0.95	0.127742042		16.16307041	0.189411655	15.55557041	
Slope >20%	0.3773	71	0.5016	5.2269822	1	0.9	0.16	0.25	0.95	0.126423035	5.194156	3.2073	63.5198	10.03839748	85.33303002

TOTAL 12.5856 tonnes

138.7981 Total Area (ha)

Sitename: M2PP Paraparaumu
 Coordinate system: NZMG
 Easting: 2679016
 Northing: 6030188

Sitename: M2PP PekaPeka
 Coordinate system: NZMG
 Easting: 2685968
 Northing: 6038488

Rainfall depths (mm)

ARI (y)	aep	Duration									
		10m	20m	30m	60m	2h	6h	12h	24h	48h	72h
1.58	0.633	7	9.9	12.2	17.5	24.2	40.6	56.3	78	90.9	99.4
2	0.5	7.5	10.7	13.2	18.9	26.1	43.5	60	82.8	96.5	105.6
5	0.2	9.6	13.7	16.8	24	32.8	53.6	73.1	99.6	116.1	127
10	0.1	11.2	16	19.7	28.2	38.1	61.5	83.2	112.6	131.2	143.6
20	0.05	13	18.6	23	32.8	44.1	70.3	94.3	126.6	147.6	161.5
30	0.033	14.2	20.4	25.1	35.8	47.9	75.8	101.3	135.4	157.9	172.7
40	0.025	15.1	21.6	26.7	38.1	50.8	80	106.6	142	165.6	181.2
50	0.02	15.9	22.7	28	40	53.2	83.4	110.9	147.4	171.8	187.9
60	0.017	16.5	23.6	29.1	41.6	55.2	86.3	114.5	151.8	177	193.7
80	0.012	17.6	25.1	30.9	44.2	58.5	91	120.4	159.2	185.6	203
100	0.01	18.4	26.3	32.4	46.4	61.2	94.9	125.2	165.1	192.5	210.6

Rainfall depths (mm)

ARI (y)	aep	Duration									
		10m	20m	30m	60m	2h	6h	12h	24h	48h	72h
1.58	0.633	7.7	10.7	13	18.3	24.7	39.9	54	73.2	88	98
2	0.5	8.3	11.6	14.1	19.7	26.5	42.7	57.6	77.7	93.5	104.1
5	0.2	10.4	14.5	17.7	24.8	33.1	52.4	70.1	93.7	112.6	125.4
10	0.1	12.1	16.9	20.6	28.8	38.3	60.1	79.8	106	127.4	141.9
20	0.05	14	19.6	23.9	33.4	44.1	68.4	90.4	119.3	143.4	159.8
30	0.033	15.3	21.3	26	36.3	47.8	73.8	97.1	127.7	153.5	171
40	0.025	16.2	22.6	27.6	38.5	50.6	77.8	102.1	134	161.1	179.4
50	0.02	16.9	23.7	28.8	40.3	52.8	81.1	106.2	139	167.2	186.2
60	0.017	17.6	24.6	29.9	41.9	54.8	83.8	109.6	143.3	172.3	192
80	0.012	18.7	26.1	31.8	44.4	58	88.3	115.2	150.3	180.7	201.3
100	0.01	19.5	27.3	33.2	46.5	60.5	92	119.8	156	187.5	208.9

Extreme rainfall assessment with climate change

Projected temperature change: 2.0 ° C
 Rainfall depths (mm)

ARI (y)	aep	Duration									
		10m	20m	30m	60m	2h	6h	12h	24h	48h	72h
1.58	0.633	8.1	11.4	14	19.8	27.2	44.9	61.7	84.7	97.8	106.4
2	0.5	8.7	12.3	15.1	21.4	29.3	48.1	65.8	89.9	103.8	113
5	0.2	11.1	15.8	19.3	27.4	37.2	60.1	81.6	110.4	127.7	139.2
10	0.1	13	18.5	22.7	32.4	43.6	69.9	94	126.8	147.2	160.5
20	0.05	15.1	21.6	26.6	37.9	50.8	80.7	108.1	144.8	168.6	184.1
30	0.033	16.5	23.7	29.1	41.5	55.6	87.9	117.5	157.1	182.5	199.3
40	0.025	17.5	25.1	31	44.2	58.9	92.8	123.7	164.7	191.8	209.6
50	0.02	18.4	26.3	32.5	46.4	61.7	96.7	128.6	171	199.3	218
60	0.017	19.1	27.4	33.8	48.3	64	100.1	132.8	176.1	205.3	224.7
80	0.012	20.4	29.1	35.8	51.3	67.9	105.6	139.7	184.7	215.3	235.5
100	0.01	21.3	30.5	37.6	53.8	71	110.1	145.2	191.5	223.3	244.3

Extreme rainfall assessment with climate change

Projected temperature change: 2.0 ° C
 Rainfall depths (mm)

ARI (y)	aep	Duration									
		10m	20m	30m	60m	2h	6h	12h	24h	48h	72h
1.58	0.633	8.9	12.3	14.9	20.8	27.8	44.1	59.2	79.5	94.7	104.9
2	0.5	9.6	13.4	16.1	22.3	29.8	47.2	63.1	84.4	100.6	111.4
5	0.2	12.1	16.7	20.3	28.3	37.5	58.8	78.2	103.8	123.9	137.4
10	0.1	14	19.5	23.7	33.1	43.8	68.3	90.2	119.4	142.9	158.6
20	0.05	16.2	22.7	27.6	38.5	50.8	78.5	103.6	136.5	163.8	182.2
30	0.033	17.7	24.7	30.2	42.1	55.4	85.6	112.6	148.1	177.4	197.3
40	0.025	18.8	26.2	32	44.7	58.7	90.2	118.4	155.4	186.6	207.6
50	0.02	19.6	27.5	33.4	46.7	61.2	94.1	123.2	161.2	194	216
60	0.017	20.4	28.5	34.7	48.6	63.6	97.2	127.1	166.2	199.9	222.7
80	0.012	21.7	30.3	36.9	51.5	67.3	102.4	133.6	174.3	209.6	233.5
100	0.01	22.6	31.7	38.5	53.9	70.2	106.7	139	181	217.5	242.3

Rainfall Erosion Index (J/ha) - Based on NIWA HIRDS Data

$R = 0.00828p^{2.2*1.7}$

48.1 p = 6 hour duration 2 year storm

R Factor	71
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K Factor				
Peat	Clay	Silt	Sand	
Sample 1		16	71	13
Sample 2		15	66	19
Average		15.5	68.5	16

Sand Soils				
Sample 1		1	6	93
Sample 2		2	8	90
Average		1.5	7	91.5
Adjusted Fine Sand		1.5	12	86.5

Gravels		10	20	70
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Nomograph Value	Correction Factor	Value	Metric Convert K Factor
	Peat (4% Organic)		
	Sand/Gravels (0% Organic)		
0.52	-0.14	0.38	0.5016
0.17	0.06	0.23	0.3036
0.2	0.1	0.3	0.396

LS Equation

<i>m</i>	0.2 for slopes < 1%
	0.3 for slopes 1 to 3%
	0.4 for slopes 3.5 to 4.5%
	0.5 for slopes > 5%

Slope (Av/Mid Slope)	Area	S2	S2+10000		L (m)	Weight L	<i>m</i>	LS
Area 1								
2.5	6.6	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	1.44	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.54	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.36	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 2								
2.5	0.5122	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0592	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.0596	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.1002	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 1								
2.5	4.426	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.689	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	1.5453	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	2.7361	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 2								
2.5	0.5863	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.2276	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.4838	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	1.8145	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 3								
2.5	2.8566	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0312	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.1189	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.1554	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 4								
2.5	0.3701	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0062	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.0343	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.2649	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 5								
2.5	0.0402	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0066	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.0646	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.2026	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 6								
2.5	0.1491	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.323	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.1127	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.1493	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 7								
2.5	0.2967	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0719	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.2426	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.3879	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 8								
2.5	1.119	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.3714	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.5687	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.4171	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 9								
2.5	0.6771	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211

7.5	0.1415	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.3093	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.465	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 10								
2.5	0.7131	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0585	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.1527	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.1629	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 11								
2.5	0.5134	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0728	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.2617	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.1499	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 12								
2.5	0.8128	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.346	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.3469	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	1.0737	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 13								
2.5	0.3989	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.1825	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.0805	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.0959	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 14								
2.5	0.2864	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0959	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.3364	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	2.6097	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 15								
2.5	0.3664	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.012	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.0756	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 1								
2.5	1.6884	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.3154	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.5939	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	1.1114	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 2								
2.5	0.2064	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0606	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.1931	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.4624	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 3								
2.5	0.1254	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.03	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.1213	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.3563	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 4								
2.5	0.0226	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.0194	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.1082	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 5								
2.5	0.3833	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.1459	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.188	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.2384	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 6								
2.5	0.1175	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0185	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.2	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.4904	400	10400	101.9803903	50	15.24	0.5	5.226982231

Area 7								
2.5	0.1358	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0038	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.0372	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.145	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 8								
2.5	1.5033	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.3173	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.5455	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.598	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 9								
2.5	0.0392	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0001	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.0968	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.2599	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 10								
2.5	0.7927	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0943	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.2878	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.3984	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 11								
2.5	0.1365	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0069	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.062	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.1036	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 12								
2.5	0.3648	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.1759	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.517	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.8386	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 13								
2.5	0.0408	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0348	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.1562	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.1701	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 14								
2.5	0.8678	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.1449	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.1855	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.4904	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 15								
2.5	0.9862	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0835	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.3967	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	2.3455	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 16								
2.5	0.5971	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.1606	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.1583	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.0991	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 17								
2.5	0.6855	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0629	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.1984	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.3729	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 18								
2.5	0.4202	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.2141	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.182	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.053	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 19								
2.5	0.9161	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0531	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412

2.5	0.3045	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.1425	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.2114	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.1214	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 12								
2.5	0.4734	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0994	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.0965	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.0766	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 13								
2.5	0.6494	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.1365	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.4554	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.191	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 14								
2.5	0.0219	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.0733	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.0173	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.0063	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 15								
2.5	0.8079	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.112	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.1693	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.135	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 16								
2.5	0.6664	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.1529	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.2198	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.077	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 17								
2.5	11.1025	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	1.2694	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	1.1628	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.6172	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 18								
2.5	5.4906	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.4638	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.4787	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.5298	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 19								
2.5	6.3419	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.3299	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.2865	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.0648	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 20								
2.5	0.6919	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.235	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.0904	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.0234	400	10400	101.9803903	50	15.24	0.5	5.226982231
Area 21								
2.5	1.6663	6.25	10006.25	100.0312451	50	15.24	0.3	0.280828211
7.5	0.5562	56.25	10056.25	100.2808556	50	15.24	0.5	1.161070412
15	0.6075	225	10225	101.1187421	50	15.24	0.5	3.280191442
20	0.3773	400	10400	101.9803903	50	15.24	0.5	5.226982231