

IN THE MATTER

of the Resource
Management Act 1991
(RMA);

AND

IN THE MATTER

The Proposed Plan
Change 10 (Lake
Rotorua Nutrient
Management) to the
BOP Regional Water &
Land Plan

TO BE HEARD BY

Bay of Plenty Regional
Council

**Supplementary Statement of Evidence of Christopher Adrian
Hansen on Behalf of Ravensdown Limited**

3 April 2017

Introduction

1. My name is Christopher Adrian Hansen and I am a Director and Principal Planning Consultant with Chris Hansen Consultants Ltd. My qualifications and experience are included in my Evidence in Chief dated 22 February 2017.
2. I provide the following supplementary statement of evidence in response to my review of the rebuttal evidence provided by Council Officers, and to summarise the outstanding matters yet to be resolved raised by Ravensdown in its submission.
3. While this is a local authority hearing, I confirm I have read the Code of Conduct contained in the Environment Court's Practice Notes for Expert Witnesses and agree to comply with it. I also confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise.

Background

4. I attended the hearing of submissions in Rotorua on Thursday 16 March 2017. My Evidence in Chief prepared for the hearing is divided into two parts: Part One provided planning evidence on those planning matters unresolved from reviewing the s.42A Officer Report; Part Two is in table form, and records the planning matters that have been resolved from reviewing the s.42A Officer Report, and a request that the recommendations of the s.42A report be accepted. Appendix B to my Evidence in Chief provided suggested wording for specific PC10 provisions to address the unresolved matters.
5. At that hearing I provided a verbal response to the rebuttal evidence provided by the following Council Officers:
 - Mr Alastair MacCormick
 - Mr Simon Park;
 - Ms Rebecca Burton; and
 - Mr Stephen Lamb.
6. As a result of the rebuttal evidence provided by the Council Officers, I amended my position on a number of the matters in Part One (planning

matters unresolved) of my Evidence in Chief. I also acknowledge that subsequent to the hearing, Mr MacCormick has engaged with Ravensdown to clarify and resolve a number of concerns relating to the updating of OVERSEER[®] reference files and the security of the Excel spreadsheet referred to by Mr Park in paragraph 6 of his rebuttal evidence.

Outline of Supplementary Evidence

7. In this supplementary evidence I record the verbal comments I made at the hearing, and identify the planning matters that remain unresolved. I also update the table in Part Two of my evidence to identify those matters that have been resolved as a result of the recommended amendments in the rebuttal evidence of Council Officers, and further discussions with Mr MacCormick.

Part One - Planning Matters Unresolved

8. The following matters raised in Ravensdown's submission remain unresolved:
 - i. An alternative approach to Benchmarking;
 - ii. Updating of OVERSEER[®] reference files;
 - iii. A lack of reference to Schedule LR Seven;
 - iv. The default rule for permitted activities being non-complying;
 - v. Nutrient Management Advisor Certification requirements;
 - vi. Schedule LR Two.
9. I will provide a brief summary of the key points on each of the above matters, without repeating the key points made in my Evidence in Chief.

An Alternative Approach to Benchmarking

10. As I discussed at the hearing, Ravensdown provided an alternative approach to the benchmarking of nitrogen losses from farm systems as it considers there is confusion and uncertainty regarding the approach adopted in PC10. In particular, Ravensdown is concerned that old versions of OVERSEER[®] have been used to determine the nitrogen reference point (NRP) from a farm, and the consequences of what the NRP number is may determine whether a consent is required and what the activity status of that consent might be. Ravensdown sought a new benchmarking policy; amendments to Method LR M5; a new definition of 'Start Point'; and amendments to Schedule LR One.

11. After listening to the questioning of Council's Officers by the Panel during the hearing on March 16th, I remain of the view that the alternative approach to benchmarking profited by Ravensdown remains a reasonable and practicable alternative to developing a NRP for a farm. The benefits of the approach proposed is that it would rely on actual nitrogen losses measured from a farm system. This would mean the benchmarking can be determined from recent actual results and the percentage reduction required can be based on real not predicted values.
12. Notwithstanding this, I acknowledged at the hearing that this alternative approach has a 5-year lead in time which may put at risk the meeting of the target load in Lake Rotorua by the 2032 timeframe required by the RPS.
13. In my opinion, should the Panel decide to retain the existing approach using the NRP determined from previous versions of OVERSEER[®], an approach proposed by Ravensdown could still be considered in order to review and revise the NRP allocations in 5 years to ensure they are accurate and represent the farming system.

Updating of OVERSEER[®] Reference Files

14. In its submission, Ravensdown expressed its concern regarding how OVERSEER[®] reference files are used within PPC10. Ravensdown raised this matter in relation to the following PPC10 provisions:
 - i. Policy LR P4;
 - ii. Definition - Nitrogen Discharge allowance;
 - iii. Definition - OVERSEER[®] File;
 - iv. Definition – Reference File;
 - v. Schedule LR FIVE;
 - vi. OVERSEER[®] Use.
15. In my Evidence in Chief I provide comment on the s.42A Report and note the Council Officer recommends Ravensdown's request be accepted or accepted in part. I also highlighted a number of amendments recommended to the PC10 provisions which I supported, including a new paragraph in Schedule LR Five clarifying on how Reference Files are to be used and updated. This clarification is most helpful.

16. Notwithstanding this, I commented to the Panel at the hearing that while most of the concerns of Ravensdown had addressed, Mr Park had referred in paragraph 6 of his rebuttal evidence to a ‘detailed Excel spreadsheet’ which records the OVERSEER[®] 6.2.0 allocation exercise. In particular, I expressed concern regarding how this spreadsheet could be part of PC10, and what would happen if the spreadsheet became corrupt or had a bug in it. It was my understanding that ECan had tried a similar methodology unsuccessfully.
17. Following up from the hearing, Mr MacCormick got in touch with me to discuss the concern I raised, and we have had a series of very helpful emails and phone discussions that have focussed the concerns and identified possible solutions. I would like to express my appreciation of the time and effort Mr MacCormick has put into discussing this matter.
18. By way of a summary, the following matters were identified by Ravensdown and responses provided by Mr MacCormick:

Security of the Spreadsheet

- i. Ravensdown expressed concern that the spreadsheet is not the most robust method of storing data and while Mr MacCormick agreed in principle, he outlined Council’s intention to build a database to manage the data and calculations (programmed to be completed in December 2017);
- ii. Ravensdown sought assurances that the reference file is secure, and in particular if the spreadsheet is ‘locked’ so it cannot be easily tampered with. Mr MacCormick indicated that Council uses a proprietary document management system called Objective. This system creates an audit log of all changes to documents within the system and enables various levels of security to be placed on files within the system. Mr MacCormick also advised that only his position within Council has the authority to make changes to the spreadsheet (although there are 3 people who share his position);
- iii. Ravensdown asked whether the reference file is constructed and stored in a way that other staff in years to come can access and follow without error. Mr MacCormick confirmed the process to create/edit the spreadsheet has been documented extensively by a business analyst.

Integrity of the Data in the Spreadsheet

- i. Ravensdown asked for clarification on how the 6.2.0 reference files were built and where the farm system information had come from. Mr MacCormick clarified that this information was described fully in the reports prepared by Mr Matheson as appendices to PC10;
- ii. Ravensdown expressed a view that farmers should be seeking assurance that their farm system has been accurately represented and the maths in the spreadsheet has been applied correctly. Mr MacCormick clarified that the allocations are based on the 2001-2004 benchmarks. These benchmarks were developed in conjunction with the farmers to ensure they represented the property accurately. The farmers were also provided with the OVERSEER[®] file farm parameter report when the benchmark was issued so that they had a record of the input data. The benchmark OVERSEER[®] files have always been available to the farmer on request. Council also have a process in place where a farmer can dispute and change their benchmark provided they can substantiate the change. A farmer or their consultant can check the maths for each block on their property from the information provided in the rules and the spreadsheet detailing their individual NDA calculations;
- iii. Ravensdown asked when a farmer requests 'his number', what does he get - Ravensdown considered they should get a copy of the reference file and a description of the farm system used within it. Mr MacCormick clarified that when a farmer or his consultant requests a NDA for a property they are asked to provide a map of where they farm. This map is superimposed over a GIS layer containing all the allocations in the catchment. Using the property boundary, a subset of the allocation data relating to their property is created and displayed in terms of total property, effective area, parcel, land use etc. With the development of the database (referred to above) Council are aiming to make this more user friendly and accessible;
- iv. Ravensdown asked if the spreadsheet has been audited. Mr MacCormick indicated it had not been independently audited, but agreed this should occur. Mr MacCormick has suggested AgResearch

as a possible independent organisation that could audit the spreadsheet. Ravensdown agrees that AgResearch is an appropriate organisation to independently audit the spreadsheet. Ravensdown also notes there are other consultants who are also capable of this undertaking this task.

19. Ravensdown's overriding concern related to how Council might be able to determine if a reference file is flawed or has been corrupted as it considered it is possible that OVERSEER[®] bugs affect reference files. Ravensdown accepts that the risk of significant errors is low. Mr MacCormick acknowledged the bugs are real but can affect all OVERSEER[®] files, not just reference files. He also saw one advantage of the reference files is that they allow Council to focus on a couple of files when searching for bugs rather than the 342 individual benchmark files.
20. In summary, I can confirm Ravensdown is comfortable that Council is fully aware of and is addressing the question of the security of the spreadsheet and integrity of the reference files through its data management systems. Ravensdown considers there are only two matters that it considers need to be addressed further:
 - i. The independent auditing of the spreadsheet – Ravensdown supports the Council pursuing this measure and using either AgResearch or a suitably qualified and experienced consultant;
 - ii. Having the process Council has in place for a farmer to challenge their benchmark more transparent – I have suggested this could be through documenting this process in the proposed Plan Implementation Report.
21. As a result of the above, Ravensdown does not seek any amendments to the provisions outlined in paragraph 14 above as sought through its submission.

A lack of reference to Schedule LR Seven

22. In its submission, Ravensdown expressed its concern that there is a lack of reference to Schedule LR Seven in the policies and rules that would assist to provide guidance as to how Nitrogen Discharge Allowances and Managed Reduction Offsets are implemented (such as in the permitted activity rules). Ravensdown sought for this schedule to be referenced in the following PPC10 provisions:

- i. Policy LR P5;
 - ii. Policy LR P7.
23. The s.42A Report (pages 116; 123 Appendix 3) recommends Ravensdown's request regarding Policy LR P5 be rejected and no amendment is made to the policies.
24. At the hearing, I noted Ms Burton in her rebuttal evidence indicated that she was 'neutral' regarding whether the Panel adopted the reference to Schedule LR Seven sought by Ravensdown. This matter is therefore with the Panel to decide, and the points raised in my Evidence in Chief apply.

The Default Rule for Permitted Activities Being Non-complying

25. In its submission, Ravensdown expressed its concern that the default rule for permitted activity Rule LR R1 and the controlled activities that do not comply with the permitted or controlled activity standards is non-complying under Rule LR R12. Ravensdown sought restricted discretionary activity where the permitted activity standards in Rule LR R1 are not met, with the council restricting its discretion to the permitted standard that is breached. Ravensdown also sought Rule LR R12 to be amended from non-complying to discretionary activity.
26. In my Evidence in Chief I review and comment on the s.42A Report (Appendix 3) recommendation that Ravensdown's requests be rejected.
27. At the hearing, I provided a verbal response to the rebuttal evidence provided by Ms Burton who referenced the comments made by Ms Wooler, Council's legal counsel. These comments related to the intention of choosing the non-complying activity status for activities that do not comply with permitted or controlled activity standards, and the suggestion that prohibited activity status could have been determined by Council to be the most appropriate way to implement the objectives of the Plan. I reiterated my concerns expressed in my Evidence in Chief regarding the use of non-complying activity status, and my understanding of the principles when prohibited activity status could be considered appropriate. I do not consider prohibited activity or non-complying activity status is appropriate in this case.
28. At the hearing, I also referred to the earlier discussion the Panel had had with one of Council's experts who indicated that there would be a possibility that

some activities are ‘technically non-compliant’ with the standards due to the use of older versions of OVERSEER[®] modelling. I expressed the view that I considered this possibility another reason why discretionary activity status is more appropriate.

29. I also acknowledged the amendment recommended to Policy LR P15 which I supported.

Nutrient Management Advisors Certification Requirements

30. In its submission, Ravensdown considered the definitions should specify that a Nitrogen Budget is typically produced by a Nutrient Management Advisor or an alternative approved by the Regional Council, as specified in Schedule LR Six. Ravensdown considers a suitably qualified person needs to provide an OVERSEER[®] Nutrient Budget (which is used for regulatory purposes) and must be a Certified Nutrient Management Advisor (CNMA) certified under the Certified Nutrient Management Advisor Programme.
31. In my Evidence in Chief I review and comment on the s.42A Report (page 311 Appendix 3) that recommends Ravensdown’s submission be rejected.
32. At the hearing, I noted Ms Burton in her rebuttal evidence did not support the request by Ravensdown to adopt the CNMA programme.
33. This matter remains outstanding, and the points I have raised in my Evidence in Chief remain my position on this matter, and in particular ensuring there is transparent set of industry standards for nutrient management advisors to meet so they provide nationally consistent advice of the highest standard to farmers.

Schedule LR Two

34. In its submission, while Ravensdown opposed input limits based on stocking rate (for reasons discussed above), it recognised the benefits of using a simple look-up table as a surrogate for nitrogen loss outputs for application of permitted activity for low intensity properties less than 10 ha. Ravensdown considers the stocking rate should be a default option for the specified nitrogen loss value for low intensity land use activity.
35. Ravensdown sought amendments to Schedule LR Two to:
- i. Provide the nitrogen loss value which provides for permitted activity land use under Rule LR R4;

- ii. Make it clear the Stocking Rate limits are default representations of the nitrogen loss value for permitted activity on farms/ farming enterprises between 5 and 10 hectares in effective area;
 - iii. Make it clear they are introduced for efficiencies in administration and capability to manage small properties, where detailed modelling of farm system losses is not warranted;
36. Ravensdown also sought an amendment to the title of Schedule LR Two to make it clear the stocking rates are a default nitrogen loss representation.
37. I note the s.42A Report (page 354 Appendix 3) recommends that both of the matters raised by Ravensdown be rejected.
38. This matter remains outstanding, and the points I have raised in my Evidence in Chief remain my position on this matter, and in particular I consider the amendments sought by Ravensdown are pragmatic and the most appropriate way to achieve the policies included in PC10.

Part Two: Submission Points Resolved

39. As discussed above, a number of further amendments were recommended in the rebuttal evidence prepared by the Council Officers, with Ms Burton's evidence including a tracked change version of PC10 that included the s.42A Report and rebuttal evidence recommendations.
40. I have updated the following table to recognise those recommendations provided through the rebuttal evidence that resolve Ravensdown's submission points (shown underlined). I support these recommendations, and seek the Panel to adopt them:

Submission Code	Plan Provisions	s.42 A Report/Rebuttal Evidence Recommendation	Comment
43.20	Introduction – adaptive management approach; integrated programme	Accept in part	I request the Panel accept the recommendation which is acceptable to Ravensdown.
<u>43.21; 43.22</u>	<u>Table LR2</u>	<u>Reject</u>	<u>Ravensdown’s submission related to concerns regarding the use of old versions of OVERSEER® and the accuracy of the proportional reduction - these concerns have been addressed by rebuttal evidence of Mr Park and Mr MacCormick. Ravensdown does not wish to pursue this submission point.</u>
<u>43.114</u>	<u>Table LR3</u>	<u>Reject</u>	<u>Ravensdown’s submission related to concerns regarding the use of old versions of OVERSEER® and the accuracy of the proportional reduction - these concerns have been addressed by rebuttal evidence of</u>

			<u>Mr Park and Mr MacCormick. Ravensdown does not wish to pursue this submission point.</u>
43.23	Policy LR P1	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.
43.24	Policy LR P2	Accept in part	I request the Panel accept the recommendation to retain the intent of the policy which is acceptable to Ravensdown.
43.25	Policy LR P3	Accept in part <u>Accept</u>	I request the Panel accept the recommendation to retain the intent of the policy which is acceptable to Ravensdown. <u>Ravensdown's submission also related to concerns regarding the use of old versions of OVERSEER® - this concerns has been addressed by rebuttal evidence of Mr Park who recommends an amendment. I request the Panel accept the recommendation which is acceptable to Ravensdown.</u>
43.26	Policy LR P4	Accept in part <u>Reject</u>	I request the Panel accept the recommendation to retain the intent of the policy and amend the reference to a Nutrient Management Plan as requested by

			<p>Ravensdown.</p> <p><u>Ravensdown's submission related to concerns regarding the updating of reference files - this concerns has been addressed by rebuttal evidence of Mr Park and discussions with Mr MacCormick. Ravensdown does not wish to pursue this submission point.</u></p> <p><u>Ravensdown also sought reference to Good Management Practice (GMP) in this policy. While Ms Burton rejects this request in her rebuttal evidence, the reasons for rejecting the request are accepted, and this matter is not pursued further.</u></p>
<u>43.27</u>	<u>Policy LR P5</u>	<u>Reject</u>	<p><u>Ravensdown's submission related to concerns regarding the use of old versions of OVERSEER® - these concerns have been addressed by rebuttal evidence of Mr Park and Mr MacCormick.</u></p> <p><u>Ravensdown does not wish to pursue this submission point.</u></p>
43.29	Policy LR P6	Accept in part	I request the Panel accept the recommendation to clarify the intent of the policy as requested by

			Ravensdown.
43.30	Policy LR P7	Accept in part	I request the Panel accept the recommendation to clarify the intent of the policy as requested by Ravensdown.
43.31	Policy LR P8	Accept in part <u>Accept</u>	I request the Panel accept the recommendation to retain the intent of the policy and amend the reference to a Nutrient Management Plan as requested by Ravensdown. <u>Ravensdown also sought reference to Good Management Practice (GMP) in this policy. Ms Burton accepts this request in her rebuttal evidence, and recommends Policy LR P8 be amended. I request the Panel accept the recommendation which is acceptable to Ravensdown.</u>
43.32	Policy LR P9	Accept in part	I request the Panel accept the recommendation to amend the policy which is acceptable to Ravensdown.
43.33	Policy LR P10	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.
43.34	Policy LR P11	Accept	I request the Panel accept the recommendation which

			is acceptable to Ravensdown.
<u>43.36</u>	<u>Policy LR P13</u>	<u>Reject</u>	<u>Ravensdown's submission related to concerns regarding the use of old versions of OVERSEER® - these concerns have been addressed by rebuttal evidence of Mr Park and Mr MacCormick. Ravensdown does not wish to pursue this submission point.</u>
43.37	Policy LR P14	Accept in part	I request the Panel accept the recommendation to amend the policy which is acceptable to Ravensdown.
43.38	Policy LR P15	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.
43.46	Introduction to Rule	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.
43.47	Definition: Property/farming enterprise	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.
43.48	General Advice Notes for Rules: No. 4	Accept in part	I request the Panel accept the recommendation which is acceptable to Ravensdown.
43.49	General Advice Notes for Rules: No. 5	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.

43.50	Rule summary flowchart	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.
<u>43.46</u>	<u>Introduction to Rules</u>	<u>Accept</u>	<u>An amendment has been recommended to the first sentence of the introduction that meets Ravensdown's concerns. I request the Panel accept the recommendation which is acceptable to Ravensdown.</u>
<u>43.51</u>	<u>Rule LR R1</u>	<u>Accept</u>	<u>Ravensdown's submission raised a concern that PC10 controlled inputs rather than outputs. Ms Burton in her rebuttal evidence accepts Ravensdown's concerns and recommends an amendment accordingly. I request the Panel accept the recommendation which is acceptable to Ravensdown.</u>
<u>43.52</u>	<u>Rule LR R2</u>	<u>Reject</u>	<u>Ravensdown's submission raised concerns regarding the restriction on the transfer of nitrogen losses prior to 2022. Mr Lamb has provided a response to this matter in his rebuttal evidence. Ravensdown accepts this response and does not wish to pursue this submission point.</u>
<u>43.53</u>	<u>Rule LR R3</u>	<u>Reject</u>	<u>Ravensdown's submission raised concerns regarding</u>

			<u>the restriction on the transfer of nitrogen losses prior to 2022. Mr Lamb has provided a response to this matter in his rebuttal evidence. Ravensdown accepts this response and does not wish to pursue this submission point.</u>
<u>43.54; 43.55; 43.56</u>	<u>Rule LR R4</u>	<u>Accept</u> <u>Reject</u>	<u>Ravensdown’s submission raised a concern that PC10 controlled inputs rather than outputs. Ms Burton in her rebuttal evidence accepts Ravensdown’s concern and recommends an amendment accordingly. I request the Panel accept the recommendation which is acceptable to Ravensdown.</u> <u>Ravensdown also raised concerns regarding the restriction on the transfer of nitrogen losses prior to 2022. Mr Lamb has provided a response to this matter in his rebuttal evidence. Ravensdown accepts this response and does not wish to pursue this submission point.</u>
<u>43.57; 43.58</u>	<u>Rule LR R5</u>	<u>Accept</u> <u>Reject</u>	<u>Ravensdown’s submission raised a concern that PC10 controlled inputs rather than outputs. Ms Burton in her</u>

			<p><u>rebuttal evidence accepts Ravensdown’s concern and recommends an amendment accordingly. I request the Panel accept the recommendation which is acceptable to Ravensdown.</u></p> <p><u>Ravensdown also raised concerns regarding the restriction on the transfer of nitrogen losses prior to 2022. Mr Lamb has provided a response to this matter in his rebuttal evidence. Ravensdown accepts this response and does not wish to pursue this submission point.</u></p>
<u>43.59; 43.60; 43.61</u>	<u>Rule LR R6</u>	<u>Accept</u> <u>Reject</u>	<p><u>Ravensdown’s submission raised a concern that PC10 controlled inputs rather than outputs. Ms Burton in her rebuttal evidence accepts Ravensdown’s concern and recommends an amendment accordingly. I request the Panel accept the recommendation which is acceptable to Ravensdown.</u></p> <p><u>Ravensdown also raised concerns regarding the restriction on the transfer of nitrogen losses prior to 2022. Mr Lamb has provided a response to this matter</u></p>

			<u>in his rebuttal evidence. Ravensdown accepts this response and does not wish to pursue this submission point.</u>
43.64; 43.67	Rule LR R7	Accept in part <u>Reject</u>	I request the Panel accept the recommendation to delete part of condition (a) as requested by Ravensdown. <u>Ravensdown’s submission raised concerns regarding the restriction on the transfer of nitrogen losses prior to 2022. Mr Lamb has provided a response to this matter in his rebuttal evidence. Ravensdown accepts this response and does not wish to pursue this submission point.</u>
43.69; 43.70; 43.71; 43.72; 43.73; 43.75	Rule LR R8	Accept <u>Accept in part</u> <u>Reject</u>	I request the Panel accept the recommendation to amend various parts of the Rule as requested by Ravensdown. <u>Ravensdown accepts the timeframes for the preparation of nutrient budgets proposed in PC10.</u>
43.76; 43.77; 43.79; 43.82;	Rule LR R9	Accept <u>Accept in part</u>	I request the Panel accept the recommendation to retain the control activity status and amend the reference to a

		<u>Reject</u>	Nutrient Management Plan as requested by Ravensdown. <u>Ravensdown accepts the timeframes for the preparation of nutrient budgets proposed in PC10.</u>
43.7; 43.83; 43.84; 43.85; 43.86; 43.89	Rule LR R10	Accept <u>Accept in part</u> <u>Reject</u>	I request the Panel accept the recommendation to amend various parts of the Rule as requested by Ravensdown. <u>Ravensdown accepts the timeframes for the preparation of nutrient budgets proposed in PC10.</u>
43.63	New Definition: Low Intensity Farming	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.
43.94	Definition: Management Plan	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.
43.96	Definition Nitrogen Discharge Allowance	Accept in part	I request the Panel accept the recommendation to amend the definition which is acceptable to Ravensdown.
43.97	Definition: OVERSEER File	Accept in part	I request the Panel accept the recommendation to amend the definition which is acceptable to Ravensdown.

43.98	Definition: Reference Files	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.
43.101	New Definition: Start Points	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.
43.102	Schedule LR One	Accept in part	I request the Panel accept the recommendation to amend the schedule which is acceptable to Ravensdown.
43.105	Schedule LR Three	Accept in part	I request the Panel accept the recommendation to amend the schedule which is acceptable to Ravensdown.
43.106/111/113/115	Schedule LR Five	Accept in part	I request the Panel accept the recommendation to amend the schedule which is acceptable to Ravensdown. <u>Refer to duration of NBs</u>
43.108	Schedule LR Six	Accept in part	I request the Panel accept the recommendation to amend the schedule which is acceptable to Ravensdown.
P394/395	Schedule LR Seven	Accept	I request the Panel accept the recommendation which is acceptable to Ravensdown.

Chris Hansen

3 April 2017