

From: Vance Hodgson <vance@hpcplanning.co.nz>
Sent: Thursday, 2 September 2021 8:54 a.m.
To: RPS
Cc: Penny Cairns
Subject: Proposed Otago Regional Policy Statement 2021 - Submission of NZPork
Attachments: NZPork Submission Otago RPS21 2 Sep 21.pdf; NZPork form-5-written-submissions-form-on-proposed-otago-rps-2021.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Submission - Sector stakeholder

Please find attached the submission of NZPork on the Proposed Otago Regional Policy Statement 2021.

Regards



Vance Hodgson
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Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)

To: Otago Regional Council

1. **Name of submitter** *(full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)*

NZ Pork

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.
3. I ~~could~~/**could not** *(Select one)* gain an advantage in trade competition through this submission. *(See notes to person making submission)*
4. I ~~am~~/**am not** *(Select one)* directly affected by an effect of the subject matter of the submission that
- adversely affects the environment; and
 - does not relate to trade competition or the effects of trade competition *(See notes to person making submission)*
5. I ~~wish~~/**do not wish** *(Select one)* to be heard in support of my submission
6. If others make a similar submission, I ~~will~~/**will not** *(Select one)* consider presenting a joint case with them at a hearing

7. Submitter Details

- a. **Signature of submitter** *(or person authorised to sign on behalf of submitter)*



- b. **Signatory name, position, and organisation** *(if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)*

Name Vance Hodgson

Position Consultant Planner

Organisation NZ Pork

- c. **Date**

01 September 2021

Address for service of submitter (*This is where all correspondence will be directed*)

d. Contact person (*name and designation, if applicable*)

Penny Cairns; Environmental Advisor

e. Email:

Penny Cairns <penny.cairns@pork.co.nz>

f. Telephone:

03 357 1407

g. Postal address (*or alternative method of service under [section 352](#) of the Act*):

PO Box 20176 Christchurch 8543

8. My submission is:

<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
<p><i>The specific provisions of the proposal that my submission relates to are:</i></p> <p><i>(Please enter the relevant objective, policy, method, or 'other' provision reference where possible. For example, 'AIR-01'.)</i></p>	<p><i>I support or oppose the specific provisions or wish to have them amended.</i></p> <p><i>(Please indicate "support" or "oppose" or "amend")"</i></p>	<p><i>The reasons for my views are:</i></p>	<p><i>I seek the following decision from the local authority:</i></p> <p><i>(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</i></p>
<p><i>Refer Attached</i></p>			
<p>Note: Additional rows for each separate provision or submission point should be added as required.</p>			

NZ PORK



SUBMISSION ON Proposed Otago Regional Policy Statement 2021

1 September 2021

To: Otago Regional Council

SUBMITTER: New Zealand Pork Industry Board

Introduction

The New Zealand Pork Industry Board (NZPork) welcomes the opportunity to submit on the Proposed Otago Regional Policy Statement 2021.

NZPork could not gain an advantage in trade competition through this submission.

NZPork wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

Contact for service:

Penny Cairns
Environmental Advisor
NZPork
PO Box 20176
Christchurch
8543





The New Zealand Pork Industry

About NZPork

The New Zealand Pork Industry Board (NZPork) is a statutory board funded by producer levies. The board's statutory function is to act in the interests of pig farmers to help attain the best possible net on-going returns while farming sustainably into the future. The Board employs an Environmental Advisor to assist farmers with implementation of environmental good practice and to represent their interests in planning regulations.

Commercial Pig Farming in New Zealand

The pig farming industry in New Zealand is small by international standards, with around 90 registered commercial pork producers nationally. Although it is a small industry, pork producers have an important flow-on effect to their communities, forming an integral part of the rural economy as they utilise other farming resources such as grains for feed production as well as providing employment. In 2007, it was estimated by the NZ Institute of Economic Research that the total economic activity associated with domestically farmed pigs was approximately \$750 million per annum.

Pigs' needs are unique compared to other farmed animals. They need constant access to shelter, a balanced diet and regular care and supervision. To meet these needs, New Zealand's commercial pig farmers have adopted a range of farming methods. Many farmers prefer indoor farming because they believe it allows them to provide the best care for the modern animal by allowing them to carefully manage their environment. Approximately 55% of New Zealand's pigs are farmed in this way.



The other 45% of New Zealand's commercial breeding herd is farmed outdoors. Outdoor breeding (also called free-farmed pork) can only occur in a moderate climate with low rainfall and free-draining soil conditions. In New Zealand, these conditions are mostly found in Canterbury. In most free-farmed systems, sows are farmed in groups in paddocks during gestation with huts for shelter and shade. When sows farrow, they are provided with individual, dry and draught-free huts with straw for warmth. A variety of housing systems are then used to house pigs after weaning, including indoor barns or open-air sheds.

Many farmers use rotational outdoor systems in which pigs are kept outdoors in paddocks that are used in rotation with a crop-pasture phase. During the stocked phase, the pigs are supplied with prepared feed, but can also forage. The crop-pasture phase is then used to remove nutrients deposited in manure from the pig phase by cutting and removing plant material from the area.

Most pork produced in New Zealand is consumed locally. This means that unlike other primary sector industries, the continued viability of pig farming in New Zealand is not needed for the continued export of commodities, but for the continued ability of kiwi farmers to produce food for kiwi families.

New Zealand pig farmers are facing several economic, social and environmental challenges in order to remain viable. The contribution of imported pork to New Zealand's total pork consumption has increased significantly in recent years (now more than 60%), putting pressure on the domestic pork industry. New Zealand pig farmers currently operate to animal welfare standards that are higher than the welfare standards in countries providing imports to New Zealand. In 2015 the use of gestational stalls was banned for domestic pig farming in New Zealand, but imports from countries permitting the use of gestational stalls continue – as other countries are not held to New Zealand's animal welfare standards.

While our farmers embrace providing well for the welfare of their animals, meeting welfare standards higher than imported foreign pork puts New Zealand farmers at a cost disadvantage, by adding to building and labour costs, increasing mortality and lowering productivity. Further restrictions on the ability of New Zealand pig farmers to operate in a sustainable and profitable way could lead to a further decline in domestic pork production or the removal of the whole New Zealand industry.

The spread of African Swine Fever in 2019 is now affecting the availability of pork globally. New Zealand can no longer rely on imported pork products in the wake of the spread of the disease. Maintaining domestic pork production is therefore essential to maintaining the availability of pork in New Zealand.

Environmental Stewardship in Pig Farming

The New Zealand pork industry is dedicated to producing environmentally sustainable pork. NZPork is proactive in supporting farmers to reduce environmental impacts through investing producer funds into research, innovation and technologies in a range of environmental areas including nutrient management, greenhouse gas emission reductions and by-product reuse.

Commercial pig farmers have a long history of environmental innovation and stewardship. Farmers using outdoor systems operate to industry agreed Good Management Practice (GMP) Standards for Outdoor Pigs, which includes maintaining stocking densities appropriate to the type of piggery operation (rotational or fixed), maintaining ground cover to minimise nutrient leaching and sediment



runoff, and excluding stock from waterways. Farmers using indoor systems have a high degree of control over nutrient application to land and are able to store effluent and defer application to land until environmental conditions will result in minimal leaching of nutrients.

NZPork is part of the Good Farming Practice Action Plan for Water Quality Governance Group and actively support and promote agreed national good farming practice principals within the commercial pig farming industry, including the implementation of farm environment plans (FEPs). NZPork provides guidance to farmers on environmental management, and has produced guidelines on Environmental Management, Nutrient Management and Carcass Composting.

Pig Farming in the Otago Region

As described above, the New Zealand Pork Industry is small, based on about 90 commercial pig farms, supplying about 40% of the pork consumed in New Zealand. The National sow herd is in the order of 26,600 sows.

In the Otago region there are six commercial pig farms with sow herds totaling 1,740 sows. In addition, there is a small number of breeders and other farms with pigs. These farms will have a wide range of manure handling systems, from an outdoor free farmed herd, and the rest a mixture of liquid and solid effluent material to utilize. Effluent can either be in a solid or liquid form depending on the housing system used. Nutrients produced are utilised to fertilise pasture or crops on farm or may be on sold for nutrients or as a soil conditioner.



<p>The specific provisions of the proposal that my submission relates to are:</p>	<p>I support or oppose the specific provisions or wish to have them amended.</p>	<p>The reasons for my views are:</p>	<p>I seek the following decision from the local authority:</p>
<p>PART 1 – INTRODUCTION AND GENERAL PROVISIONS</p>			
<p>Purpose</p>	<p>Support in Part / Oppose in Part</p>	<p>Support the statement that the ORPS responds to identified significant regional values and resource management issues relating to Otago's environment, historic heritage, economy, recreational opportunities and communities. However, primary production activities and in particular pig farming is not only significant from an economic perspective it is also a critical part of New Zealand's food production system.</p> <p>Most pork produced in New Zealand is consumed locally. This means that unlike other primary sector industries, the continued viability of pig farming in New Zealand is not needed for the continued export of commodities, but for the ability to produce food for New Zealand families.</p>	<p>Amend the <i>Purpose</i> of the ORPS 21 to identify an additional regionally significant value and resource management issue relating to Otago's food production capacity.</p>
<p>Description of the Region</p>	<p>Support in Part / Oppose in Part</p>	<p>As noted above, primary production activities and in particular pig farming is not only significant from an economic</p>	<p>Amend the <i>Description of the Region</i> of the ORPS 21 to describe Otago's food production capacity.</p>



		perspective it is also a critical part of New Zealand's food production system.	
Cooperation and partnerships with other local authorities	Support	Support the statement that local authorities together can clearly define their resource management roles and responsibilities to reduce duplication of effort and streamline processes for Otago's communities. For the pig farming sector this is critical and has not been the practice in many districts/regions resulting in unnecessary regulation, duplication and cost.	Retain as proposed.
PART 2 – RESOURCE MANAGEMENT OVERVIEW			
SRMR – Significant resource management issues for the region			
Introduction	Support in Part / Oppose in Part	As noted above, primary production activities and in particular pig farming is not only significant from an economic perspective it is also a critical part of New Zealand's food production system. The introduction to the regions significant resource management issues notes and economic perspective from resource use. It also notes social and cultural perspectives relating to recreation, housing, and cultural activities. The introduction fails to identify food production values.	Amend the <i>Introduction</i> to the Significant Resource Management Issues for the Region of the ORPS 21 to describe Otago's food production values and in the relation between natural resources, resource use and strategies (Figure 2). Amend the <i>Introduction</i> to identify an additional regionally significant value and resource management issue relating to Otago's food production capacity.
SRMR-11 – Natural hazards pose a risk to many Otago communities			
Statement	Oppose in Part	Natural hazards pose a risk to food production and supply either through disruption to the primary production activity or through a breakdown in	Amend the <i>statement</i> to note that Natural hazards pose a risk to food production and supply.



		infrastructure (including transport connections).	
Context	Support in Part	The context notes that the Otago region is exposed to a wide variety of natural hazards that impact on people, property, infrastructure, historic heritage and the wider environment.	Amend the <i>context</i> to note that Natural hazards pose a risk to food production and supply.
Impact Snapshot: Economic	Support in Part	The assessment of economic impacts notes that <i>"Food security can also be affected."</i> This is not just an economic impact but also a social impact and an impact on the health and safety of people and communities.	Identify an additional regionally significant value and resource management issue relating to Otago's food production capacity and that the effects of natural hazards on food security extend beyond economic impacts.
SRMR-I2 – Climate change is likely to impact our economy and environment			
Impact Snapshot: Economic	Support in Part	The assessment of economic impacts notes that Climate change impacts will result in both impacts and opportunities for regional industry in terms of jobs, business income and profitability. Key industries likely to be impacted include sheep, beef, dairy and deer farming, cropping and viticulture, forestry, fisheries and aquaculture, as well as tourism. Indoor and outdoor pig farming is another key primary production activity in the region to be acknowledged. This is not just an economic impact but also a social impact and an impact on the health and safety of people and communities.	Identify an additional regionally significant value and resource management issue relating to Otago's food production capacity and that the effects of climate change on primary production activities extend beyond economic impacts. Indoor and outdoor pig farming is another key primary production activity in the region to be acknowledged.



SRMR-13 – Pest species pose an ongoing threat to indigenous biodiversity, economic activities and landscapes			
Statement	Oppose in Part	In addition to threatening indigenous biodiversity, economic activities and landscape, pest species also pose a threat to biosecurity and the rural production systems producing food for domestic consumptions and export.	Amend the <i>statement</i> to note that Pest Species pose a risk to biosecurity and food production.
Context	Support in part	The context identifies that ORC has established a Biosecurity Strategy sets out ORC's objectives for biosecurity management in the region with priorities providing for protection of indigenous biodiversity, protection of landscape, recreation, cultural and amenity values and minimising the impact on agricultural production.	To ensure a clear linkage through the ORPS, the <i>statement</i> above should be amended to note that Pest Species pose a risk to biosecurity and food production.
Impact Snapshot: Economic	Support in Part	<p>The assessment of economic impacts notes that pests impacts include costs to agriculture, business and government to control pests and mitigate impacts are considerable, as are biosecurity costs to prevent pest incursion which are reflected in biosecurity fees and taxes. Biosecurity failure can have serious economic impacts on existing industries.</p> <p>This is not just an economic impact but also a social impact and an impact on the health and safety of people and communities.</p>	Identify an additional regionally significant value and resource management issue relating to Otago's food production capacity and that the effects of pests and biosecurity on primary production activities extend beyond economic impacts.
SRMR-15 – Freshwater demand exceeds capacity in some places			
Context	Support in Part	The context notes that population growth and land-use intensification in urban and rural environments can create increased	Amend <i>context</i> to note that population growth also increases food demand.



		<p>demand for freshwater for human consumption, irrigation and other economic uses.</p> <p>Population growth also increases food demand and particularly domestic food supply. This is a separate use to irrigation or economic uses and should be identified.</p>	
Impact Snapshot: Economic	Support in Part	<p>The assessment of economic impacts notes that freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply), agriculture (including irrigation), hydro-electric power supply, and mineral extraction.</p> <p>Freshwater is also a factor that directly contributes to food production which is another human need.</p> <p>This is not just an economic impact but also a social impact and an impact on the health and safety of people and communities.</p>	Amend Impact snapshot to note that freshwater in the Otago region is a factor of production that directly contributes to food production as a human need.
SRMR-17 – Rich and varied biodiversity has been lost or degraded due to human activities and the presence of pests and predators			
Impact Snapshot: Economic	Support in Part	<p>The assessment of economic impacts notes that the economic costs of lost productivity due to pests, erosion and damage to land, are likely to be significant and there is potential for loss of biodiversity to adversely impact on the economy.</p> <p>This is not just an economic impact but also a social impact and an impact on the</p>	Identify an additional regionally significant value and resource management issue relating to Otago's food production capacity and that the effects of pests and biosecurity on primary production activities extend beyond economic impacts.



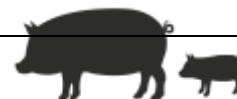
		health and safety of people and communities.	
SRMR-110 – Economic and domestic activities in Otago use natural resources but do not always properly account for the environmental stresses or the future impacts they cause			
Statement	Support in Part / Oppose in Part	While noting the significant contribution that agriculture makes to employment and economic wellbeing, the statement fails to identify the value and contribution of food production in Otago for domestic food supply.	Amend the statement to identify the value and contribution of food production in Otago for domestic food supply.
Context	Support in Part / Oppose in Part	While noting the significant contribution that agriculture makes to employment and economic wellbeing, the context fails to identify the value and contribution of food production in Otago for domestic food supply.	Amend the context to identify the value and contribution of food production in Otago for domestic food supply.
SRMR-111 – Cumulative impacts and resilience – the environmental costs of our activities in Otago are adding up with tipping points potentially being reached			
Statement	Support in Part / Oppose in Part	The statement would be improved through explicit recognition of food production values and the relationship to human health.	Amend statement to provide explicit recognition of food production values and the relationship to human health as a necessary consideration for decision making that responds to ORPS issues.
Context	Support in Part / Oppose in Part	The context would be improved through explicit recognition of food production values and the relationship to human health.	Amend context to provide explicit recognition of food production values and the relationship to human health as a necessary consideration for decision making that responds to ORPS issues.
IM – Integrated management			
IM-P2 – Decision Priorities	Oppose	The policy applies a decision-making hierarchy for all resource management decisions that appears to be an extension of Te Mana O Te Wai to all resources and is inconsistent with Part 2 and Purpose of the RMA.	Delete IN-P2 or redraft to be consistent with Part 2 and Purpose of the RMA.



PART 3 – DOMAINS AND TOPICS			
DOMAINS			
AIR			
AIR-P3 Providing for discharges to air	Support	Support policy that supports discharges to air provided they do not adversely affect human health, amenity and mana whenua values and the life supporting capacity of ecosystems.	Retain AIR-P3 as proposed.
AIR-P4 Avoiding certain discharges	Oppose in part	The policy sets an 'avoid' outcome based around a determination on what are 'offensive, objectionable, noxious or dangerous effects'. These terms are not defined but will be in the Air Plan and at an RPS level guidance should be provided on what these effects are.	Delete or provide guidance on the terms 'offensive, objectionable, noxious or dangerous effects'.
AIR-P5 Managing certain discharges	Support in Part	Support a policy that seeks to manage the effects of discharges to air beyond the boundary of the property of origin from activities that include but are not limited to farming. The reference should be to primary production activities noting that this includes intensive primary production.	Amend AIR-P5 as follows: <ul style="list-style-type: none"> • Farming <u>Primary Production</u> Activities
AIR-M3 – Territorial authorities	Support in Part / Oppose in Part	No later than 31 December 2029, territorial authorities must prepare or amend and maintain their district plans to include provisions that direct an urban form that assists in achieving good air quality by: managing the spatial distribution of activities. The method is also relevant in the rural context to separate sensitive activities from primary production activities.	Amend AIR-M3 or include a new method that requires that territorial authorities must prepare or amend and maintain their district plans to include provisions that manage the spatial separation of sensitive activities from primary production activities.



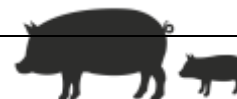
AIR-M5 Incentives and other mechanisms	Support in part	Support a method that sets out that in collaboration with territorial authorities, iwi authorities, key stakeholders and industry, Otago Regional Council must, on an ongoing basis, use other mechanisms or incentives to assist with achieving the air quality objectives. The plan would be improved by also recognizing the role that good management practices and industry guidelines and codes can play in achieving the outcomes.	Amend AIR-M5 to recognize the role that good management practices and industry guidelines and codes can play in achieving the outcomes.
LF – Land and Freshwater			
LF-VM-O2 – Clutha Mata-au FMU vision	Support in part	Support a vision and objective that in the Dunstan, Manuherekia and Roxburgh rohe of the Clutha Mata-au FMU, innovative and sustainable land and water management practices support food production in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact where that contact is necessary.	Retain vision and objective.
LF-VM-O3 – North Otago FMU vision	Support	Support a vision and objective that by 2050 in the North Otago FMU: innovative and sustainable land and water management practices support food production in the area and improve resilience to the effects of climate	Retain vision and objective.
LF-VM-O4 – Taieri FMU vision	Support	Support a vision and objective that by 2050 in the Taieri FMU, innovative and sustainable land and water management practices support food production in the area and improve resilience to the effects of climate change.	Retain vision and objective.



LF-VM-O6 –Catlins FMU vision	Support	Support a vision and objective that by 2030 in the Catlins FMU healthy, clear and clean water supports opportunities for recreation and sustainable food production for future generations.	Retain vision and objective.
LF-VM-M3 Community involvement	Support	Support Otago Regional Council working with communities to achieve the objectives and policies in this chapter, including by supporting industry-led guidelines, codes of practice and environmental accords where these would contribute to achieving the objectives of this RPS.	Retain as proposed.
LF-FW-O8 – Fresh water	Support in part	Support an objective that in Otago's water bodies and their catchments: the health of the wai supports the health of the people and thriving mahika kai. The objective would be improved by identifying that it is the health and wellbeing needs of people to be supported.	Amend LF-FM-O8 as follows: (1) the health of the wai supports the health <u>and well-being needs</u> of the people and thriving mahika kai
LF-FW-AER7	Oppose	The specified Anticipated Environmental Result is that <i>Water in Otago's aquifers is suitable for human consumption, unless that water is naturally unsuitable for consumption.</i> This outcome is an essential need and relevant to those water sources (ground and surface) necessary to satisfy that need. This is not necessary for the health and wellbeing of water bodies and freshwater ecosystems in all locations and an unrealistic outcome.	Delete or amend LF-FW-AER7 as this outcome is an essential need and relevant only to those water sources (ground and surface) necessary to satisfy that need.
LF-LS – Land and soil			



LF-LS-O11 Land and Soil	Support	<p>Support an objective to supports the safeguarding of the life supporting capacity of soils and the availability and productive capacity of highly productive land for primary production.</p> <p>Intensive primary production activities (both indoor and outdoor) may, by locational necessity, be situated on highly productive land where there are economic and operational benefits associated with concentrating such enterprises in specific rural localities.</p> <p>To assist plan administration and interpretation to lower order planning documents, highly productive land should be defined in the RPS.</p>	Highly productive land should be defined in the RPS.
LF-LS-O12 Use of land	Support	Support the objective to maintain soil quality and its contribution to achieving environmental outcomes for fresh water.	Retain as proposed.
LF-LS-P16 Integrated management	Support	Support policy that recognizes the interconnections between soil, vegetation and water quality and quantity are important.	Retain as proposed.
LF-LS- P17 Soil values	Support	Support policy that recognizes the soil is a critical component of production systems.	Retain as proposed.
LF-LS- P18 Soil erosion	Support	<p>Support the approach to implement management practices to minimise potential for loss of soil to water bodies.</p> <p>NZPork has developed guidelines and codes of practice for outdoor pig farming activity to assist with such management</p>	Retain as proposed.



		practices and in particular achieving good management practice.	
LF-LS -P19 Highly productive land	Support	Support maintaining the availability and productive capacity of highly productive land. Implementing the policy requires Highly Productive Land to be defined.	Highly productive land should be defined in the RPS.
LF-LS-P20 – Land use change	Support	Support policy that promotes changes in land use that promote the health and quality of soil. Rotational outdoor pig farming is a method to achieve the outcome.	Retain as proposed.
LF-LS-M11 Regional plans	Support in Part	<p>The method requires Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and then, when it is made operative, maintain that regional plan to:</p> <p><i>(1) manage land uses that may affect the ability of environmental outcomes for water quality to be achieved by requiring:</i></p> <p><i>(c) effective management of effluent storage and applications systems, and..</i></p> <p>Plan Change 7 to the regional plan is clarifying terminology around effluent systems, facilities, storage and application. The RPS must be consistent with that terminology.</p>	Ensure consistency with terminology determined through Plan Change 7 to the regional plan.
UFD – Urban form and development			
UFD-O4 Development in rural areas	Support in Part	While supportive of the objective and polices that support achieving the objective, this is an uncomfortable fit within a chapter that seeks to address Urban Form and Development. The objective and relevant policies are better	Add new standalone topic on Rural Areas.



		included in a standalone topic on Rural Areas.	
UFD-P7 – Rural Areas	Support in Part	While supportive of the objective and policies that support achieving the objective, this is an uncomfortable fit within a chapter that seeks to address Urban Form and Development. The objective and relevant policies are better included in a standalone topic on Rural Areas.	Add new standalone topic on Rural Areas.
UFD-P8 – Rural lifestyle and rural residential zones	Support in Part	While supportive of the objective and policies that support achieving the objective, this is an uncomfortable fit within a chapter that seeks to address Urban Form and Development. The objective and relevant policies are better included in a standalone topic on Rural Areas.	Add new standalone topic on Rural Areas.
UFD-E1 Explanation	Support in Part	The explanation provides a direction on the outcome for rural areas. This is an uncomfortable fit in the Urban Form and Development chapter.	Add new standalone topic on Rural Areas.
UFD-PR1 – Principal reasons	Support in Part	The principal reasons provide a direction on the outcome for rural areas. This is an uncomfortable fit in the Urban Form and Development chapter.	Add new standalone topic on Rural Areas.
UFD-AER11	Support in Part	The anticipated environmental result is an uncomfortable fit within the chapter on Urban Form and Development and relates only to some narrow aspect of the matters covered in this chapter that are related to rural areas.	Add new standalone topic on Rural Areas.

