



Ministry for the
Environment
Manatū Mō Te Taiao

2D COMBINED PLAN STRUCTURE STANDARD

Recommendations on Submissions Report for the first set of
National Planning Standards

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Context to this document

This document forms part of the suite of recommendations on submissions reports prepared for the National Planning Standards. It should be read in conjunction with the Overall Introduction and is likely to reference the other recommendations on submissions reports listed below. The recommendations on submissions reports are organised as follows:

1. **Overall introduction**

- Explanation of all of the recommendations on submissions reports
- High-level submissions analysis

Detailed recommendation reports

2A. **Regional Policy Statement Structure Standard report**

2B. **Regional Plan Structure Standard report**

2C. **District Plan Structure Standard**

2D. **Combined Plan Structure Standard**

2E. **Chapter Standards report** including

- Introduction and General Provisions Standard
- National Direction
- Tangata Whenua Standard
- Strategic Direction Standard
- District-wide Matters Standard
- Designations Standard
- Schedules, Appendices and Maps Standard

2F. **Format Standard** including

- Chapter Form Standard
- Status of Rules and Other Text and Numbering Form Standard

2G. **Zone Framework Standard**

2H. **Spatial Layers Standards** including

- Regional Spatial Layers Standard
- District Spatial Layers Standard

2I. **Definitions Standard**

2J. **Noise and Vibration Metrics Standard**

2K. **Electronic Accessibility and Functionality Standard** including

- Baseline electronic accessibility
- Online interactive plans

2L. **Mapping Standard**

2M. **Implementation of the Standards**

1 Background

Councils can combine regional policy statements (RPSs), regional plans (RPs) and district plans (DPs) or multiples of the same type of plan,¹ for example, two RPs. Combined plans (CPs) are becoming more common as councils integrate and streamline more of their plan content. The largest CP is the Auckland Unitary Plan, which includes RPS, RP and DP provisions for one-third of New Zealand's population.

The draft CP Structure Standard retained the introduction, tangata whenua, evaluation and monitoring, and schedules, appendices and maps parts at the beginning and end of the planning document structure standard. In the middle, to recognise the mix of CPs that may exist, the draft standard included:

- RPS chapters
- region-wide chapters
- district-wide chapters
- catchments
- area-specific matters.

The general direction for these chapters was that, if a CP included a particular topic or matter that corresponded to the planning document types, these topics or matters must be included those chapters. This meant councils could select the relevant chapters for their plan.

The CP Structure Standard does not apply to CPs of one plan type, for example, the Wairarapa Combined District Plan that combines three district plans.

¹ Resource Management Act 1991, section 80, sets out this optional function.

2 Submissions

2.1 Three types of submissions on the combined plan structure

Thirty-nine submitters commented on the draft CP Structure Standard. Eleven submitters either gave general support for the standard or gave support for specific parts. Eighteen submitters requested changes to specific topics that applied to other policy statement and plan structures as well as the CP structure. Ten submitters (including all five unitary councils) asked for major changes to the CP structure or an overhaul of the CP Structure Standard.

Our analysis of points from submitters who requested changes to specific topics across more than one policy statement and plan structure standard is in the recommendations on submissions reports for the RPS, RP and DP structure standards. The recommendations relating to those structure standards are carried over to the CP Structure Standard, unless the recommended changes need to be modified for the CP Structure Standard.

Notably, most of the submitters who asked for major changes or an overhaul of the CP Structure Standard are those most affected by the CP standard; for example, councils and organisations that speak for councils. This report addresses their concerns while recognising the general support and support for specific parts from other submitters.

2.2 Common themes

The submitters wanting major changes made the following points about the draft CP Structure Standard (excluding the points that are addressed in other parts of this report).

- Unitary plans (ie, one Resource Management Act 1991 (RMA) plan for one unitary council) need their own plan structure, to better address the requirements of complex fully combined plans such as the Auckland Unitary Plan.
- The standard does not provide for integrated management across domains and topics.
- The standard has unnecessary duplication of themes and chapters.
- A separate part for RPS provisions is not needed, or is less important, when the RPS is setting policy for only one plan.
- The direction on the coastal environment chapter and related coastal provisions is unclear.
- The standard does not direct where provisions that apply to multiple chapters should go. For example, should provisions about natural character in the coastal environment go in the coastal environment chapter, the natural character chapter or an area-specific chapter?
- The standard does not clarify whether councils are able to combine or reorder chapters.
- Placing issues and objectives into separate chapters removes the line-of-sight vertical integration of policy direction encouraged by the rest of the standards.

We generally accept these points, except for the last one in part. At an RPS level, chapters on significant resource management issues for the region, and issues of significance to iwi authorities, are useful to provide the high-level parameters for resource management across the region.

3 Analysis

3.1 Plan structures specific to each combined plan combination

The submissions identified that the draft CP Structure Standard was not efficient at a fundamental level. It did not provide certainty for councils, discouraged integrated management, and did not take advantage of the efficiencies that CP structures can have.

There are four possible combinations of CPs:

Type 1: RPS–RP–DP

Type 2: RPS–RP

Type 3: RPS–DP

Type 4: RP–DP.

The RPS–RP–DP combination is the most common type, with all unitary councils using or intending to use this structure. Two councils use the RPS–RP combination type: Hawkes Bay Regional Council and Horizons (Manawatu–Wanganui) Regional Council. The RPS–DP combination type is unlikely to happen, because it would involve the regional and district councils combining their planning documents but excluding any RPs.

No council is currently using the type 3 and type 4 structures, and currently this is unlikely to happen. A type 3: regional policy statement–district plan combination would involve the regional and district councils combining their high level and local level planning documents but for some reason excluding any regional plans.

A type 4: regional plan–district plan could be used if a council or councils wanted to keep its regional policy statement separate. However this situation is not efficient for councils. A separate regional policy statement document is useful when the regional policy statement has policies and methods that affect multiple plans. With a combined regional plan–district plan, the regional policy statement only affects that combined plan (and any separate regional plans).

In consultation with submitters, we recommend two new plan structures for the first two combinations types: an RPS–RP–DP and an RPS–RP. If the RPS–DP or the RP–DP combinations occur, councils can use the Introduction and General Provisions and the Appendices and Maps parts from the district plan structure, and stitch together the other parts from the existing structures in the planning standards as relevant.

The two new structures are also strongly influenced by the detail in the written submissions and the recommendations reports for 2. *Regional Policy Statement Structure Standard*, 3. *Regional Plan Structure Standard* and 4. *District Plan Structure Standard*.

3.2 Consultation on exposure draft

We sent an 'exposure draft' RPS–RP–DP structure to staff from all five unitary councils (excluding Chatham Islands Council) and workshopped this draft on 30 October 2018. We invited the two other submitters who described a separate RPS-RP-DP structure to the workshop (New Zealand Planning Institute and Resource Management Law Association). However, they were content to let the unitary councils discuss this. A representative from the Department of Conservation also attended the 30 October workshop.

We also talked with staff from Hawkes Bay Regional Council and Horizons Regional Council confirming that the new RPS-RP structure would, as a concept, be appropriate for their plans.

4 Key recommendations specific to combined plan structure

4.1 Separation versus integration of regional policy statement provisions

A critical question for both new CP structures (RPS–RP–DP and RPS–RP) was whether RPS provisions should be integrated or separated from RP and DP provisions, that is, woven together or separated and stapled together. The RMA does not direct either approach, only that the RPS requirements must be met. Submissions gave arguments for both options.

While the proposed Auckland Unitary Plan had its RPS provisions integrated within the Unitary Plan, the Independent Hearings Panel recommended separating the RPS provisions to the front of the Unitary Plan, because the RPS does not contain rules and is a higher order planning document.² The Proposed Marlborough Environment Plan, on the other hand, (as described in Marlborough District Council’s submission on the planning standards) fully integrates its RPS provisions within the plan, because this is a simpler and more coherent resource management framework, and RPS provisions in a unitary plan do not allocate responsibilities across councils and plans.³

After the decisions on the proposed Auckland Unitary Plan were notified, the Resource Legislation Amendment Act 2017 added the new section 18A to the RMA, which specifies that every person must take all practicable steps to (among others) ensure that policy statements and plans are worded in a way that is clear and concise. We believe this can also apply to minimise duplication of content in plans.

Our recommended RPS–RP–DP structure, which unitary councils will use, recognises all these considerations. High-level RPS provisions, for example, the issues of regional significance and strategic direction, are located in a separate part of the plan. However, the detailed RPS provisions on specific domains, themes and topics must be integrated with the RP and DP provisions, including rules that they are directing. We tested this concept in a workshop with unitary council staff across New Zealand and received general support for the concept.

Our recommended RPS–RP structure, which some regional councils will use, is different in that the RPS content is separated from RP content. While this is a less simple structure, and some topic chapters are duplicated, it allows the RPS content to provide clear direction to DPs, which, in this case, are separate plans usually produced by separate councils. DPs must give effect to their RPS. This also reflects the structure of the two current RPS–RP plans: the Horizons Regional Council One Plan and the Hawkes Bay Regional Council Regional Resource Management Plan.

² Refer to Independent Hearings Panel report to Auckland Council, Overview of Recommendations 2016-07-22, section 8.1, para 3. Sourced from www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/history-unitary-plan/ihp-designations-reports-recommendations/Documents/ihpoverviewofrecommendations.pdf.

³ Marlborough District Council submission to the draft first set of National Planning Standards: Applying the Combined Plan Structure Standard to the Proposed Marlborough Environment Plan.

4.2 Chapter for urban growth, form, and land and rural environment

4.2.1 Consideration of submissions

Nelson City Council, Tasman District Council and Auckland Council asked for the combined RPS–RP–DP plan structure to include a chapter or section to address more strategic matters, for example: urban development and growth, the management of land and rural areas, the rural–urban intersection and amenity in general. Similar submission points were also made on the other plan structure standards.

We agree that chapters and sections to address these strategic matters are important. All RPSs, RPs and DPs deal with the development and form of their urban areas, whether they have positive, neutral or negative growth. Current and proposed national direction, such as the National Policy Statement on Urban Development Capacity (NPS-UDC), requires provisions at this level to be added to RMA policy statements and plans. High-level directions and concepts from spatial plans and hapū–iwi planning documents on urban topics also need a chapter location.

4.2.2 A new ‘integrated management’ chapter

In line with our S-RPS and S-RP recommendations, we recommend an ‘integrated management’ chapter for the new RPS-RP-DP and RPS-RP structures, set at the RPS level. Within this chapter, councils can add sections on a number of high-level themes.

4.2.3 A new ‘urban form and development’ chapter

We also recommend that the RPS-RP-DP and RPS-RP structures include an ‘urban form and development’ chapter. This chapter is mandatory for all RPS-RP-DP plans, but is only mandatory for the RPS-RP if relevant. This reflects the recommendation for this chapter to be mandatory in the district plan structure, as the district plan will host the majority of provisions relating to this topic. This chapter provides a home for provisions required by the NPS-UDC. Councils can also use this chapter to add their own provisions on the urban form and development topic.

Because ‘urban form and development’ does not fit under an existing topic heading in the RPS-RP-DP structure, the new urban form and development chapter has its own heading.

We expect the objectives, policies and methods within the ‘urban form and development’ chapter are likely to be more strategic than specific, and will not contain rules. Rules and other specific methods to implement the provisions in the urban form and development section are generally most appropriate within zone group chapters (eg, Commercial and mixed-use zones chapter) or within zone sections.

4.2.4 No specific chapter for the rural environment

In line with the S-RPS and S-RP recommendations, the RPS–RP–DP structure provides for high-level rural environment policy to be located in the chapters of integrated management, land and freshwater, or the Rural zones chapter, as applicable. Councils can allocate provisions to these chapters in accordance with the CP structure directions.

In CPs, local authorities can add additional topic chapters (eg, high-class soils) to address other significant land issues, provided these are not synonyms or subsets of chapters specified in the planning standards. Future national direction may also include a planning standard direction to add a new topic chapter and location for important matters. Therefore, we do not recommend specifying other land-based topics within the CP Structure Standard at this time.

4.2.5 No specific chapter for amenity generally

Case law on amenity values suggests to us that amenity in district plans is best addressed within area-specific chapters and sections (eg, zones, precincts, freshwater management units, catchments, development areas) that identify the amenity values to maintain and enhance for those areas. Regional plans use amenity in the context of the feature or value being managed, for example, public access to the margins of water bodies and the coast, and freshwater quality. We do not recommend including an overall ‘amenity’ theme chapter.

4.3 Location of coastal provisions to be clarified

4.3.1 Coastal provisions in the plan structure

Councils generally sought both greater clarity about the location of coastal marine area and coastal environment provisions but also flexibility in order to achieve integrated management.

The Gisborne, Marlborough and Tasman district councils and Auckland Council raised questions about where coastal provisions are best located, and noted concern that directions about this in the draft standards were too ambiguous. Submitters agreed that the coastal provisions deserve more prominence in the plan structure.

We agree that there should be a clear location for coastal environment and coastal marine area provisions. This however does not mandate that all provisions relevant to the coastal environment should be located solely in the coastal environment domain chapter. Other chapters may be deemed more appropriate by councils, such as the following.

- Provisions that apply to other topic chapters, for example, natural character and historic heritage, can use the policy approach located in those topic chapters.
- Freshwater–coastal water interface issues are best addressed within a freshwater management unit (extending into the coastal marine area). For example, sedimentation on a catchment basis rather than ‘coastal environment’ can account for biodiversity values, habitat and ecological functioning, and natural character across the jurisdictional line of mean high water springs.⁴
- Coastal activities that are grouped together or are incompatible with each other, can be best managed through coastal zones or other area-specific management units. For example, a port zone or marina zone to allow for coastal structures, noise and discharges to be managed within a specific location suitable for coastal transport, recreation and related activities.

We recommend that the CP structures follow the recommendations for the RP structure standards, where ‘coastal environment’ is a separate domain chapter. This chapter must set

⁴ Mean high water springs is the high tide mark that is the jurisdictional boundary in the RMA between land managed by district plans and the coastal marine area.

out the council's approach to managing the coastal environment and giving effect to the New Zealand Coastal Policy Statement. Within this chapter there must be a coastal marine area section where general coastal marine area provisions must be located, unless there is a separate regional coastal plan or proposed regional coastal plan. Beyond this, we recommend that the high-level directions in the revised CP Structure Standard below about where provisions should be placed (in area-specific chapters, topic chapters, domain chapters (including coastal environment) or the integrated management chapter) should also apply to coastal provisions, which must be cross-referenced to the coastal environment chapter if they are not located within it.

4.3.2 Coastal zone and precinct chapters are located under the area-specific matters heading

In the combined plan structures, coastal zones and precincts should be alongside the land-based zones and precincts in the Area-specific matters part or heading. This is consistent with the recommended directions for the RP Structure Standard, which states that provisions which apply only to a freshwater management unit, catchment, identified area or zone must be located in the relevant chapter or section under the Area-specific matters heading.

Provisions for any coastal precinct located only within one coastal zone are located within the relevant coastal zone section. Precincts that apply across multiple zones will need their own chapter. This is the same approach used in the DP Structure Standard. We recommend providing a coastal precincts chapter for any multi-zone coastal precincts used in plans.

We recommend grouping all coastal zones into one coastal zone chapter, and all multi-zone coastal precincts (including any precincts that apply landward and seaward of mean high water springs) into one coastal precinct chapter. This is consistent with the recommendation for the RP Structure Standard.

We recommend clarifying in the CP Structure Standard that CPs must not have just one zone covering the entire coastal marine area in their region. The purpose of zones is to differentiate and aggregate compatible activities, not to apply rules across an entire domain. The latter provisions are best located in the domains chapters, for the reasons set out in the recommendations reports for the RPS and RP structure standards.

5 High-level recommendations

We recommend the following high-level changes are made to the CP Structure Standard:

- add a new RPS–RP–DP structure
- add a new RPS–RP structure for regional councils
- add an integrated management chapter for all CPs, set at the RPS level
- add an urban form and development chapter, which is mandatory in the RPS–RP–DP structure
- add a separate Coastal environment domain chapter
- add high-level directions about where provisions should be placed, for example, in area-specific chapters, topic chapters, domain chapters (including coastal environment) or in the integrated management chapter
- replace the draft CP Structure Standard with the recommended CP Structure Standard included in our recommended planning standards version
- apply the recommendations made in other recommendations reports, as summarised in table 1 below.

The changes recommended in this report can be seen in the recommended planning standards version. Given the number of changes being made, preparing a track changed version would have been too cumbersome, especially when the function of columns change and new rows are added. Please refer to the Combined Plan Structure Standard for the final changes recommended.

6 Recommendations on submissions on regional policy statement, regional plan and district plan structure standards

Many submission points on the draft CP Structure Standard also apply to the standards for the RPS, RP and DP structures. Table 1 identifies these submission points, the reports where the discussion on these topics is located, and the implications of the consequent recommendations on the CP structure. This report defers to the recommendations in these reports and applies them to the CP Structure Standard where relevant, along with a degree of alignment where the recommendations vary across different plan structures.

Note the submission points in table 1 are not a complete summary and are only used to identify a submission point and where it is assessed. (Yellow highlight indicates the point is still to be addressed in these reports.)

Table 1: Submission points addressed in the recommendation reports for the regional policy statement, regional plan and district plan structure standards, which also apply to the Combined Plan Structure Standard

Submission point	Submitter(s)	Recommendation reports	Implication for Combined Plan Structure Standard
Plan structure			
Clarify where issues are to be addressed	Tasman District Council	Regional policy statement (RPS)	A new direction explains where issues must be placed.
Add 'beds of lakes and rivers' theme	Forest Owners Association	Regional plan (RP)	A new 'land and freshwater' domain provides for this topic.
Add a separate 'energy' section	Genesis Energy, Contact Energy, Mercury New Zealand	RPS, RP, Chapter	Plans can add this separate chapter or section under the new 'energy, infrastructure and transport' heading.
Allow topics to be addressed in other sections as well as their main section	Genesis Energy	RP	New directions explain: <ul style="list-style-type: none"> provisions specific to area-specific matters are in those chapters and sections provisions applying predominantly to only one topic are in a topic chapter provisions applying to multiple topics are in a domain chapter provisions addressing integrated management across topics and domains are in an integrated management chapter
Redefine themes to minimise overlaps	New Zealand Law Society	RP	
Clarify when chapters are required, and when they may be combined	Resource Management Law Association (RMLA)	RP	
Revise direction for matters covering multiple themes	RMLA	RP	
More flexibility for 'special topics' to be used	RMLA	RP	
Place topics in 'themes' not 'region-wide matters'	RMLA	RP	

Submission point	Submitter(s)	Recommendation reports	Implication for Combined Plan Structure Standard
Arrange themes and matters alphabetically	RMLA	RPS, RP	<ul style="list-style-type: none"> additional chapters may be added where they are not synonyms or subsets of existing chapters Chapters and sections are arranged alphabetically underneath each heading.
Arrange themes alphabetically or clarify that local authorities can order them as appropriate	New Zealand Law Society	RP	
Allow 'special topics' to be used when the local authority determines the topic is more appropriately separated	New Zealand Law Society	RPS	Allow for regionally-specific matters to be included as additional topics.
Remove 'hazardous substances' as a specific section	The Oil Companies	Chapter	'Hazardous substances' section is removed, with a direction added that any of these matters are in a 'risks associated with hazardous substances use' chapter under the 'hazards and risks' heading.
Separate 'hazardous substances' and 'contaminated sites'	Resources Consulting	Chapter	
Rename 'contaminated sites' to 'contaminated land management'	The Oil Companies	Chapter	Renamed 'contaminated land'.
Add an 'integrated management' section	Contact Energy, Mercury New Zealand, Horticulture New Zealand (HortNZ)	RPS, RP	An integrated management chapter is added for RPS provisions.
Add a 'geothermal' chapter	Contact Energy, Mercury New Zealand	RPS, RP	'Geothermal' is added as a domain chapter.
Add an 'electricity generation' chapter	Mercury New Zealand	RPS, RP, Chapter	Not added, although councils may choose to add this as a chapter or section under the 'energy, infrastructure and transport' heading.
Add a 'transport' chapter or section	PSPIB/CPPIB Waiheke Inc, AMP, Stride Property Limited, Auckland Council	Chapter	
Remove 'landforms'	HortNZ	RPS, RP	'Landforms' removed.
Add a 'strategic direction' chapter	HortNZ, RMLA, New Zealand Law Society, Te Runanga o Ngāti Ruanui, Nelson City Council	RPS, RP	Not applicable to the two combined plan (CP) structures provided, because the RPS provisions provide the strategic direction instead.
Put 'noise' and 'light' in separate sections	Environmental Noise Analysis and Advice Service	Chapter	'Noise' and 'light' separated into new chapters under a 'general matters' heading.
Add 'genetically modified organisms' as a subheading	Soil and Health Association	Chapter	Not added, although councils may choose to add this as a chapter under the 'hazards and risks' heading.

Submission point	Submitter(s)	Recommendation reports	Implication for Combined Plan Structure Standard
Place 'infrastructure' and 'subdivision' in 'general region-wide matters' ⁵	RMLA	District plan (DP), chapter	Subdivision is its own heading, under which councils add their own chapters. Infrastructure is in chapters and sections of the 'energy, infrastructure and transport' heading.
Place schedules and appendices at the end of relevant chapters	Hutt City Council	DP	Schedules may be part of individual chapters or placed in appendices.
Ensure all Resource Management Act 1991 (RMA) section 62 content requirements are provided for	Auckland Council	RPS	All section 62 requirements are now provided for in the structure or directions.
Add a chapter for general rules	Auckland Council	Chapter	General rules are located under the 'how the plan works' heading, with chapters for: statutory context, general approach, cross-boundary matters, and relationship between spatial layers.
Add natural hazards as its own matter or theme	GNS Science	RP	Natural hazards chapter is added. Councils may choose to add a section on natural hazards at the RPS level in the 'hazards and risks' chapter.
Refer to the spatial planning tools in the structure standards	GNS Science	Spatial layers	The location of spatial layers provisions is specified in the spatial layers standards.
Coastal environment			
Provide for a regional coastal plan in the CP Structure Standard	Horizons Regional Council, Auckland Council	RP	Coastal plan provisions are located within a domain chapter called 'coastal environment'. A 'coastal marine area' section is mandatory unless there is a separate regional coastal plan.
Elevate coastal provisions to chapter level	Auckland Council	RPS, RP	
Clarify that regional coastal plan provisions do not have to meet the District-Wide Matters Standard (S-DWM) and do not have to be located under 'natural environmental values'	Gisborne District Council, Auckland Council	RP	The 'coastal environment' domain chapter must include an explanation as to how the plan manages the coastal environment. Cross-references to coastal environment provisions in other chapters and sections must be included in the 'coastal environment' chapter.
Clarify where in the plan to locate coastal environment and regional coastal plan provisions, particularly those that straddle the coastal environment and coastal marine area boundaries	Tasman District Council, Auckland Council	RPS, RP	
Tangata whenua-related			

⁵ Note we recommend changing 'region-wide matters' to 'domains and topics' in the RPS–RP–DP structure.

Submission point	Submitter(s)	Recommendation reports	Implication for Combined Plan Structure Standard
Require maps of mana whenua status	HortNZ	Chapter	This remains optional for councils and mana whenua to decide.
Add a mandatory section for issues of significance to iwi authorities in the RPS part	Independent Māori Statutory Board, Nelson City Council, Auckland Council	RPS	A new mandatory chapter 'resource management issues of significance to iwi authorities' is added.
Add a tangata whenua section in the RPS part	Gisborne District Council, Auckland Council	RPS	Councils may decide to include this in the 'integrated management' chapter, in line with the principle of integrating Māori provisions in the plan (except for sites or areas of significance to Māori), with cross-referencing.
Integrate iwi issues into provisions that address these concerns, with cross-referencing to the issues and national direction with iwi input	Te Runanga o Ngati Kuia	Chapter	
Variance in preferred terms: Māori, tangata whenua, mana whenua	Auckland Council	Chapter	The correct term to use is generally up to council relationships with Māori groups.
Allow for sections on Māori land and Treaty of Waitangi settlement land	Auckland Council	Chapter	Councils may decide to add topic chapters on this matter, where the matter is not already covered by the existing chapters.
Recognise Treaty of Waitangi settlement legislation in Part 1	Whetu Consultancy	Chapter	This is now a requirement within the 'statutory context' chapter.
Zones and spatial layers			
Include 'post-harvest zone' and 'research zone'	HortNZ	Zone framework	Councils may decide to add these as special purpose zones, if they meet the criteria in the Zone Framework Standard (S-ASM).
Add an 'energy generation zone'	Contact Energy, Mercury New Zealand	Zone framework	
Amend purpose of 'hospital zone'	Southern Cross Hospitals	Zone framework	The purpose is amended to address this submission point.
Separate overlay provisions from all-area provisions	CivilPlan Consultants Limited	Spatial layers	No change made.
Better distinguish zone chapters from specific zone names	RMLA	Zone framework	Rename the following zones: ' <u>General Residential Zone</u> ', ' <u>General Rural Zone</u> ' and ' <u>General Industrial Zone</u> '
Add a coastal marine area zone	Nelson City Council	Spatial layers	Clarify that one zone cannot apply to the entire coastal marine area within the region.
Clarify if precincts can be used over coastal marine areas	Auckland Council	Spatial layers	Precincts now added as a regional spatial layer – so can be used to modify coastal marine area zones.

Submission point	Submitter(s)	Recommendation reports	Implication for Combined Plan Structure Standard
Clarify location of coastal plan zones, and whether the zone can cross mean high water springs	Auckland Council	Spatial layers, zone framework	<p>Added 'Coastal zones' as a chapter that can be used in the combined 'unitary' plan structure in the Area-specific matters part.</p> <p>Clarified that coastal plan zones can cross mean high water springs in combined plans with a district plan component.</p>
National and regional direction			
Add 'water conservation orders' to 'national direction instruments' chapter	New Zealand Law Society	Chapter	Water conservation orders now added to the 'national direction instruments' chapter.
Provide for regional direction to be discussed in Part 1	New Zealand Law Society	Chapter	Regional direction can be discussed in the 'statutory context' chapter.
Enable national direction instruments to be updated without full public consultation	Whetu Consultancy	Chapter	RMA section 58I and Schedule 1 clause 16 specify that Schedule 1 must not be used for these updates to comply with mandatory directions on national direction instruments.

7 Guidance to accompany this standard

The following guidance to accompany the CP Structure Standard is recommended, as a result of matters raised by submitters on the CP Structure Standard:

- give good practice instructions and examples on how coastal provisions can be located within the plan structure
- give examples of how CP provisions should be allocated across a more integrated plan structure
- give instructions on how domains and topics headings can be used within the catchment and area-specific chapters
- give more explanation and examples on options for geothermal provisions in CPs.