



22 August 2018

File Ref: L225-NPS01
Ask For: Pere Hawes

National Planning Standards
Consultation 2018



Dear Liz

Marlborough District Council Submission on the Draft National Planning Standards

Thank you for providing an opportunity to submit on the draft National Planning Standards. As is set out in the Marlborough District Council (Council) submission attached to this letter, the Council notified an integrated Regional Policy Statement, Regional Coastal Plan, Regional Plan and District Plan, called the Proposed Marlborough Environment Plan, in June 2016. This Plan is currently proceeding through the First Schedule Process with submissions currently being heard.

The Council has considered the draft planning standards, particularly those that apply to a combined plan, and has serious concerns about the effect of the draft planning standards on the integrity and effectiveness of the Proposed Marlborough Environment Plan. The reasons for that concern are set out in the submission. The Council has developed an additional option for a combined plan structure that recognises that Section 80 allows for RMA planning provisions to be totally integrated under Section 80 of the RMA. The Council would welcome the opportunity to discuss this alternative option further prior to the national planning standards being gazetted in early 2019.

Without substantive changes to the draft planning standards or the provision of an alternative option for combined plans (particularly for unitary plans), the Proposed Marlborough Environment Plan will have to be re-written and re-cast and then re-notified under the First Schedule of the RMA. The Council has raised a concern about whether this would involve an effective use of ratepayers' money as it will not result in any improvement in the management of regionally significant issues in a Marlborough context.

Please contact myself if you have any queries with respect to the content of the Council submission.

Yours sincerely

**PERE HAWES
ENVIRONMENTAL POLICY MANAGER**

ENCL

Applying S-CP to the Proposed Marlborough Environment Plan

The Council has serious concerns regarding the effect of S-CP on the structure of the Proposed Marlborough Environment Plan (MEP). The MEP is a combined regional policy statement, regional coastal plan, regional plan and district plan and was notified on 9 June 2016. Hearings are currently underway and the Hearings Panel will publicly notify its decision on the MEP in 2019.

Section 80(2) of the RMA allows for the combining of regional policy statements, regional plans, regional coastal plans and district plans. A combined plan can be achieved by at least two methods. The first method is the “stapling” of the planning documents (i.e., having separate plans in the same document). The second method is integrating planning documents so that the resulting provisions serve both regional and district functions at the same time.

As a Unitary Authority, the Marlborough District Council has a history of preparing integrated planning documents. The operative Marlborough Sounds Resource Management Plan and Wairau/Awatere Resource Management Plan are combined regional coastal plans, regional plans and district plans. More recently, the Council took the opportunity to also integrate the Regional Policy Statement into the same planning framework as the plans, resulting in the notification of MEP.

The draft national planning standards effectively require standalone planning documents. There must be a regional policy statement, separate content to address region wide matters not covered in the regional policy statement and separate content (including objectives and policies) to discuss area specific matters (by way of catchment or zone provisions). This structure is reflected in instructions contained in the direction column of Table 6.

The MEP provisions do not follow this structure. In the MEP, an objective, policy or method can be a regional policy statement provision, and/or a regional plan provision and/or a district plan provision at the same time. Coding is used to identify the nature of provision(s) as required by Section 80(8) of the RMA.

It is understood that the Tasman District Council is also seeking to integrate its regional policy statement and resource management plan through a review process.

Except for those rules that apply across the District, all rules in the MEP are zone based. However, there are no zone based objectives and policies.

The benefit of this structure is that a single set of resource management issues is identified for the District, which is then addressed through a single management response (in terms of objectives, policies and methods). In summary, the integration of regional policy statement, regional coastal plan, regional plan and district plan provides a dramatically simpler but more coherent resource management framework than that represented in S-CP.

In the usual structure of local government, it is understandable why an RPS in particular should be a separate document: Territorial authorities have to give effect to the direction through their (normally) separate district plans. In the Council's experience, there is no sustainable management benefit to having standalone regional policy statement provisions in a unitary authority setting, nor is there any benefit to the plan user. Indeed, there are real risks of losing integration and coherency if the planning standards continue to require policy statement and plan content to be separate for unitary planning documents.

Allowing for an integrated resource management document arguably best achieves Outcome 2 of the consultation document in a unitary setting: A single set of planning provisions is easier to access and relevant content is easier to find. This is Council's experience with the administration of the operative resource management plans. After 20 years of application in practice, and as tested as part of the review process, local plan users prefer this simpler plan framework for the delivery of regional and district functions.

Summary

The RMA contains a hierarchy of planning documents that reflects the usual two tiered system of local government. However, in a unitary setting there is no compelling reason to maintain this hierarchy and there are environmental and user benefits to integrating the content of regional policy statements, regional plans and district plans.

Changes Sought

1. That the S-CP should be reconsidered in light of this submission and submissions made by other unitary authorities. At the very least, a second option should be provided for S-CP that provides an opportunity for the integration of regional policy statement, regional coastal plan, regional plan and district plan provisions. This is a more efficient and effective means of delivering regional and district functions in a unitary authority setting. An option has been worked up by the Council and is set out in Appendix 1. The Council would welcome the opportunity to discuss this option further. Tasman District Council is also likely to be interested in such discussions, as might other unitary authorities.

The following comments on S-CP are made in the context that S-CP does not enable provisions to be totally integrated. As such, these comments build upon the matter raised above.

Appropriateness/Applicability of themes/region wide issues

The existing provisions of the MEP could be included in the regional policy statement, in a region wide issue or as an area specific issue. This reflects the “direction” provided in Table 6. Those directions force councils to select which mutually exclusive planning function the provision is seeking to fulfil. As highlighted above, such a determination is not necessary in a unitary setting where a provision can fulfil multiple functions.

The Council has considered the themes/region wide issues carefully in the context of the MEP. After doing so, it remains unsure how existing content would be restructured.

A good example is the provisions for the coastal environment. The coastal environment obviously includes both the coastal marine area and land adjoining the coastal marine area. It would appear that provisions managing activities in the coastal environment could be restructured in the regional policy statement as a theme or, depending on circumstances, a regional wide matter, or in the natural environmental values theme, or indeed in a separate regional coastal plan. In addition, the MEP also contains a coastal environment zone and a coastal marine zone, so coastal environment objectives and policies could also be included in area specific matters.

The Council is left confused as to where MEP provisions related to the coastal environment are to be located under S-CP. There are other similar examples.

The MEP also contains policies that address multiple themes within the same policy. Typically these apply to the management of activities in specific environments such as coastal environment, urban environments or rural environments. Implementing S-CP will again require these policies to be recast into the various themes or region wide issues or area specific matters. To stay with the emphasis on coastal matters, Policy 13.2.1 of the MEP is a typical example. It has provisions that could be split across 7 themes. To do so would result in duplication of policy provision.

Arguably, there could be a case made for “urban environments” and “rural environments” themes to also be included in the planning standards, perhaps instead of or in addition to the “land” theme. The former would assist councils giving effect to the NPS for Urban Development Capacity. The majority of issues that regional councils and unitary authorities manage are within a rural environment setting, so the latter would provide for those issues.

There is a risk that a requirement to restructure the MEP according to a structure of regional policy statement, theme based provisions and area specific provisions will potentially result in the same set of existing objectives and policies being repeated in different parts of the S-CP structure. Any such duplication and repetition will cause confusion as a plan user will naturally question the relationship between these provisions.

The Council does not understand why the “Environmental Risk” heading is used to group natural hazards and hazardous substances. Most resource management issues involve some form of environmental risk, usually a risk of degradation of a natural resource or an adverse effect on a physical resource. The risk involved is why these matters are resource management issues in the first place.

Changes Sought

1. In the absence of adopting the Council’s request regarding a second option for S-CP, that greater clarity where existing plan provisions are to be located in S-CP be provided.

2. The Council understands that the draft planning standards have yet to be applied to a plan. The Council encourages the Ministry to “test run” plans (including a unitary plan) as part of the process of providing the clarity requested.

Area Specific Matters Standard (S-ASM)

As set out earlier in this submission, except for those MEP rules that apply across the District, all MEP rules are zone based. However, there are no zone based objectives, policies or methods. All of the MEP objectives, policies or methods are contained in a separate volume to the rules and are based on particular natural or physical resources or environmental settings.

To comply with S-CP and S-ASM the Council would have to develop zone specific objectives, policies or methods. This would obviously involve a significant first schedule process.

The RMA does not specify that there must be zone based objectives and policies and instead specifies that a plan must contain objectives, policies to implement the objectives and rules to implement the policies (and may contain other methods to implement the policies).

S-ASM is an example of the draft planning standard pre-determining plan content. A zone is simply a tool that allows a set of rules to apply to a spatially defined area of land. Those rules either permit, require resource consent for or prohibit identified activities occurring within the area, usually based on the actual or potential adverse effects of the activity. Any application for resource consent would be determined having regard to the relevant objectives and policies. The nature of the proposal and the nature of the surrounding environment will be influential in determining relevant objectives and policies.

The Council has operative resource management plans that were notified in the late 1990s. These follow the same structure as the MEP in terms of objectives, policies and rules. After 20 years of practical application, the Council, upon review, did not see a need to deviate from the approach used in the operative plans. This decision was informed by feedback by local plan users.

Changes Sought

1. That S-CP is amended so that there is no requirement to have zone specific objectives and policies when the regional policy statement themes and/or region wide matters provide an adequate policy framework.

Tangata Whenua Structure Standard

Chapter 3 of Volume 1 of the MEP was developed in partnership with Marlborough’s tangata whenua iwi through an “Iwi Working Group” consisting of one mandated representative from each iwi authority. The Iwi Working Group effectively prepared the provisions of Chapter 3 with the assistance of Council staff. This process involved 27 hui over a six year period.

Although Chapter 3 of the MEP covers many of the matters that are set out in S-TW, S-TW involves a level of prescription that is not evident in Chapter 3. In this context, it is not clear what the term “If the following matters are addressed in policy statements and plans...” means in practice. Given the requirements of the RMA, the Council questions whether there is an expectation for all of the matters in S-TW to be addressed in its planning documents. If this is the case, additional content will have to be developed by the Council and iwi authorities, and these would require first schedule changes to be introduced.

Iwi authorities will reasonably want to know why the content that it co-authored is being changed and repackaged after such an extensive process to complete an agreed set of provisions.

S-TW requires the content of Chapter 3 to be split between four discrete chapters. This may again result in a loss of integration between the existing provisions.

Ideally, the structure of contextual information of the type set out in S-TW should be able to be determined in consultation with tangata whenua iwi.

As an aside, the Council would take the opportunity to note that from its experience that recording iwi histories is a risky exercise that will result in tension between iwi. Each iwi will have its own history and this may conflict with the account of another iwi, especially if there is a history of conquest.

Given the level of prescription set out in S-TW, the Council requests that past processes to include tangata whenua iwi content in existing plans be respected. It is recommended that if S-TW is to be retained in its current form, then it be applied upon statutory review so that the provisions can be developed in consultation with iwi authorities.

S-TW also does not provide for issues of significance to iwi authorities to be included in this section. Presumably, these issues are to be identified in regional policy statement content given Section 62 of the RMA. Iwi may have a preference, as they did in the preparation of the MEP, to identify these issues separately. It is considered that there should be the flexibility to either include issues of significance to tangata whenua iwi in S-TW or include a separate theme in the regional policy statement structure.

Changes Sought

1. That S-TW is amended so that it applies upon the statutory review of operative planning documents. In this way, existing provisions that were often developed in partnership with iwi authorities will be given appropriate respect for the life of the operative document.
2. That greater flexibility is provided with respect to the location of issues of significance to tangata whenua iwi within S-CP.
3. That flexibility is provided for the packaging of the content in 3, 4, 5 and 6 of S-TW so that the package can reflect local circumstances and the partnership between the relevant tangata whenua iwi and the Council.

Line of sight for policy direction

For regional policy statement issues under S-CP, the draft planning standard requires issues to be separately contained in a standalone chapter to the objectives, policies and methods. The objectives, policies and methods are then structured according to themes.

For region wide issues under S-CP, the draft planning standard requires issues and objectives to be separately contained in a standalone chapter to the policies and methods. The latter are to be structured according to themes.

F5 requires objectives to be grouped together and policies to be separately grouped together.

The requirement to group issues, objectives and policies separately risks a loss of coherency in responses to resource management issues. The MEP packages relevant issues, objectives, policies and methods together so that there is clear line of sight through the sequence of provisions applied to the management of each resource management issue.

There is no explanation provided for the alternative (and inconsistent) structure, so it is difficult to evaluate the relative merits of the structures.

F5 also requires rules to be packaged with the relevant objectives and policies. There are examples of where the integration achieved through the MEP will be lost as a result of implementing F5. For example, all of the permitted activity standards for constructing a building or structure in a particular zone are packaged together. A plan user can establish compliance by considering one set of plan standards. Those standards serve a number of purposes including amenity outcomes, natural hazard management, landscape protection and natural character preservation. Under the S-CP, a plan user will have to seek out the standards in different parts of the MEP.

The splitting of rule content and the distribution of this throughout the plan will not assist plan users to find relevant material. This appears inconsistent with Outcome 2 of the consultation document.

As rules are simply a trigger for resource consent, there would seem no barrier to allow for standards to the rules to provide for multiple themes/matters.

Changes Sought

1. That S-CP is reconsidered in light of this submission and submissions made by other unitary authorities. At the very least, a second option should be provided for S-CP that provides an opportunity for the integration of regional policy statement, regional coastal plan, regional plan and district plan provisions

as this is a more efficient and effective means of delivering regional and district functions in a unitary authority setting. This option has been worked by the Council up and is set out in Appendix 1.

2. In the absence of 1 above being adopted, that F5 be amended to remove the requirement for objectives to be grouped with objectives and policies to be grouped with policies. Instead provisions should be able to cascade so that all of the provisions addressing an issue are able to follow the statement of that issue.
3. In the absence of 1 above being adopted, that F5 be amended to provide greater flexibility for rules/standards to implement policy direction from multiple themes/matters.

Electronic accessibility

The Council was the second in the country to offer its operative planning documents in an e-plan format. After 4 years of use, the e-plan consistently receives between 600 and 1000 hits per month. The Council is convinced that not only does the integration of GIS with plan content enhance plan accessibility, in doing so e-plans also make the plans more relevant because plan content can be accessed on a property specific basis.

There is no information to identify where the Council currently rates relative to the scale shown in Figure 1. It is assumed that the Council is at scale 4, even if it does include some of the functionality of scale 5.

The Council has investigated activity specific queries in the past and has found this area to be problematic to provide for. In particular, the accuracy of the result of the query relies on the correct identification of the scale and location of the proposed activity given that some rule standards are sensitive to location and/or proximity to specific features.

Notwithstanding the above concern, the Council remains supportive of electronic accessibility. To this end, the Council is in the process of developing a digital consenting tool which it will seek to be integrated with the e-plan.

It is noted that 11 of F-1 requires all versions of the current plan since first becoming operative must be available from the Council website. The Council has historically undertaken a very large number of changes to the operative plans as a result of plan changes, plan change requests, Clause 20A changes and to incorporate new or amended designations. The plan content is provided to hardcopy plan users (internal and external) by way of a physical update and the version of the plan on the website is updated electronically.

The Council saves the existing version of the plan so would be able to comply with 11 of F-1, but the amount of plan content accessible would be vast. We provide this electronic content now upon request. The only requests we have had are from the Environment Court in the context of prosecution hearings (as they want to consider the plan as it existed at the time of the alleged offending).

The Council can foresee the Council website becoming jammed with plan content in order to comply with 11 of F-1. Any time there is a straight forward Clause 20A change or a new designation, the Council would be required to repeat all plan content on its website at that date.

Changes Sought

1. That 11 of F-1 be deleted.
2. That councils be encouraged to record all plan versions as good practice.

Mapping

The colour palette contained in Table 21 sets out the colours to be utilised for the various zones established via the planning standards. The Council notes that although the colours are distinguished by R, G and B, the tones of the various zones are very similar. At its extreme, low-density residential is almost indistinguishable from medium density residential. It is recommended that consideration be given to greater differentiation in the colour palette.

The symbology for hazards is inadequate. It uses one transparent colour to depict all hazards that are mapped spatially (with the exception of faultlines). The symbology needs to enable distinction to be made between the different types of hazard, as different regulatory methods will be applied to the management of each hazard. The MEP also maps the degree of risk involved with flood hazard (Level 1, Level 2 and Level 3). Each level of risk has different rules apply.

Changes Sought

1. That more detailed hazard mapping is enabled by providing greater flexibility in the mapping of hazard overlays.

Definitions

As the Council has been focussing on the impact of S-CP on the MEP, it has not considered all of the definitions included in the draft standards in detail. It has noted circumstances where inconsistent definitions will result in the need to adjust provisions in Volume 1 of the MEP (issues, objectives, policies and methods). As the planning standard definitions will alter policy intent, these changes will likely necessitate First Schedule plan changes to implement.

There are examples where the planning standard definitions do not extend as far as or go beyond Section 2 of the RMA and it is arguable whether it is *vires* to do so. A critical example, given the frequency of use of the term, is the definition of “structure”.

In some cases, the Council has had to provide more than one definition for the same term as the term is used differently in a regional and district function context. For example, the term site has a different meaning when constructing a structure at a specific location compared to taking water from a river (for which there is usually not a title¹) and using that water to irrigate a property. For this reason, the term “site” in the MEP has four meanings, each used in a different context.

The definitions of site used in the planning standards are based on legal property descriptions. However, in most contexts, “site” is used to describe the location at which an activity or proposed activity occurs or is proposed to occur. Where a discrete activity is proposed to occur at a specific location, relying on a computer freehold register to describe the site does not assist the person proposing to undertake the activity, the Council or anybody else. The larger the property, the greater the uncertainty over the nature of the “site”.

Changes Sought

1. That further consideration is given to the definition of “site” in the context of S-CP (and probably for all other structure standards) to take into account the range of settings in which the term can be used. The definition should focus on identifying the discrete site of an activity or proposed activity as opposed to the property on which it is proposed to occur.

S-Sam

The draft standard uses the term schedule and appendix but makes no distinction between these terms. It is therefore not clear whether there is intent for each to be used for different purposes.

In 4, there is a very prescriptive structure for schedules that implies that schedules are to be used for site specific matters. However, not all matters included in schedules are of this nature. For example, and picking up on the direction in 6, the MEP content for ONFL and coastal natural character are very broad due to the scale of assessment. It is doubtful that the existing content of Appendix 1 or Appendix 2 of the could be restructured to conform to the schedule table of the draft planning standard in 4. Yet, Appendix 1 and Appendix 2 contain critical information to allow the policy framework for both landscape and natural character to function effectively.

The nature of the content of the MEPs 26 appendices varies significantly. Amongst the content, the appendices contain tables of values, criteria, methodology, maps, lists and diagrams. Appendices are typically used to provide further information that would unnecessarily “clutter” the provision to which it relates if it was included with the provision. Given the variation in appendix content, the need for S-Sam is questioned by the Council.

In 8, appendices (as opposed to schedules) must only contain technical or descriptive specifications required to be complied with to meet a **rule** or **rule requirement**. It is not clear why the draft planning standard has this focus. The provision to which an appendix relates could be an objective, policy or non-regulatory method. Of the 26 appendices included in the MEP, seven appendices relate to policy matters only. Under

¹ River bed in a Marlborough context is normally unallocated Crown land administered by Land Information New Zealand.

the draft planning standard, these matters could not be included as an appendix (and it is not clear where this content would be housed). Some of these existing appendices are large in size: Appendix 1 and Appendix 2 both exceed 30 pages.

Changes Sought

1. That the need for a planning standard for appendices and schedules be reconsidered.
2. If it is determined that a planning standard is required, that the relationship between an appendix and a schedule be clarified.
3. If it is determined that a planning standard is required, that “rule” in 8 be replaced with “provision” to allow for the wider application of appendices to plan content.

Implementation

Consequential amendments are enabled under Section 58I of the RMA to avoid duplication or conflict. As highlighted in this submission, it will be very difficult to apply S-CP to the MEP given its integrated nature. Unless changes requested in this submission are made to S-CP, the MEP content would have to be recast and rewritten. This is certainly beyond the scope of any change envisaged by Section 58I and would have to proceed through the First Schedule process at Council’s cost.

The restructuring and rewriting of provisions is a significant task and will require considerable resource to implement. Although that work can be programmed according to the final timetable (see comments below), the resource will realistically have to be applied at the expense of other plan work.

The Council is also conscious that implementation of the planning standards will be occurring at the same time as the Council will be required to give effect to other national policy statements and implement national environmental standards. The National Policy Statement for Freshwater Management is particularly relevant in this regard.

The notification of the MEP in June 2016 was the culmination of a comprehensive review exercise that commenced in 2009 and involved extensive landowner and community consultation and engagement.

Although a seven year timeframe has been provided for the transition between the MEP and the application of the planning standards, for the reasons outlined above it is considered that the Council will have to commence a review process sooner than the statutory timeframe. This review would be driven by a compliance requirement and would have nothing to do with identifying and addressing resource management issues in Marlborough. The Council questions whether this is an efficient use of ratepayer funds given the review process has not long been completed.

The Council believes that this issue is best addressed by reconsidering the draft planning standard for combined plans and not by providing councils more time to transition.

As an aside, it is not anticipated that local plan users will understand the reason for restructuring MEP content, nor the need for additional First Schedule processes. Regardless of the final form of the planning standards, the Ministry for the Environment should provide communication support to all councils regarding the implementation of the planning standards. This should cover both the intent of the planning standards and their content.

Implementation timeframes

The Council supports the extension of the implementation timeframes set out in the consultation document. In particular, it supports the concept that councils that have recently completed first schedule process should be provided with an additional two years (i.e., a seven year implementation timeframe). The Council notes the criterion applied in this regard in the consultation document and also notes that the Council is included on the list of councils to which the criterion applies.

Please note that the correct name for the Council is not used in the mandatory directions. “Marlborough District Council” should replace “Marlborough Council”.

The Council is aware that other councils have expressed concerns over timeframes and have sought that implementation timeframes be linked to statutory review cycles. The Council also supports this as an

alternative given the concerns over costs of implementation highlighted in this submission. It makes practical sense to co-ordinate any restructuring of plan content with the renotification of the content itself.

Changes sought

1. That the planning standards be implemented on statutory review of operative plans; or
2. If an implementation timeframe is to be retained that is less than 10 years, then those councils that have commenced First Schedule process should continue to be provided an additional two years to implement the planning standards.
3. That in the event of the status quo or 2 above being adopted, that "Marlborough Council" be replaced by "Marlborough District Council".
4. That the Ministry for the Environment develop communication support to all councils regarding the implementation of the planning standards. This should cover both the intent of the planning standards and their content.

Appendix 1

S-CP: Draft Combined Plan Structure Standard

Mandatory Directions

- 3 All combined Plans must contain mandatory headings (ie, part, chapter or section headings) in the order provided in either Table 6: Combined Plan Structure—Option A or Table 7: Combined Plan Structure—Option B (for integrated regional policy statements) to the extent relevant for the combined plan.
- 4 Amend to add the words, “If using Option A,” to the beginning of clause 4.
- 5 Add the words “regional policy statement,” before the words “regional coastal plan”.

Amend title of Table 6 by adding “—Option A” to the end of the title.

Insert new Table 7: Combined Plan Structure—Option B

Chapter	Section	Direction
PART 1 – INTRODUCTION AND GENERAL PROVISIONS		As for Table 6
PART 2 – TANGATA WHENUA		As for Table 6
Part 3 – REGION–WIDE MATTERS (Issues, Objectives, Policies & methods (except rules))		This part must be used If a matter in the first column is included in the plan, each of the matters specified in the second column must be addressed in relation to that matter
Introduction		General discussion of significant issues
Air Quality		Significant resource management issues for the region
Coastal environment		
Landscape, landforms and natural character		Resource management issues of significance to iwi authorities in the region
Ecosystems and indigenous biodiversity		Objectives sought to be achieved by the statements of issues
Natural hazards, hazardous substances and contaminated sites		The policies for those issues and objectives and an explanation of those policies
Community values including historic heritage, sites of significance to Maori and protected trees		The methods (excluding rules) used, or to be used, to implement the policies
Infrastructure and energy		The principal reasons for adopting the objectives, policies and methods
Land		The anticipated environmental results of those policies and methods
Water including catchments and freshwater management units		
		The processes to be used to deal with cross

Subdivision		<p>boundary issues</p> <p>Procedures to monitor the efficiency and effectiveness of the policies or methods</p> <p>Any other information required</p>
General region-wide matters including temporary activities, noise and light, earthworks, signs, activities on the surface of water and mining		
Special topics		
PART 4—AREA SPECIFIC MATTERS INCLUDING RULES AND DESIGNATIONS		
General regional-wide rules	All zones	<p>For the zones that the local authority chooses, the zones must follow the order, and the chapter and section heading set out in this standard.</p> <p>If only one zone is chosen under a chapter heading, the section heading becomes the chapter heading and the provisions are housed there.</p>
Residential zones	Low-density residential zone	
	Residential zone	
	Medium-density residential zone	
	High-density residential zone	
Rural zones	Rural zone	
	Rural production zone	
	Rural residential zone	
	Rural settlement zone	
Commercial zones	Neighbourhood commercial zone	
	Local commercial zone	
	Commercial zone	
	Mixed use zone	

	Town centre zone	
	City centre zone	
Industrial zones	Light industrial zone	
	Industrial zone	
	Heavy industrial zone	
Open space and recreation zones	Open space zone	
	Sport and active recreation zone	
	Conservation zone	
Special purpose zones	Airport zone	
	Port zone	
	Hospital zone	
	Education zone	
	Stadium zone	
Precincts		
Development areas		
Designations		
PART 5 – SCHEDULES, APPENDICES AND MAPS		Local authorities must implement the Schedules, Appendices and Maps Standard (S-SAM).
Schedules		
Appendices		
Maps		