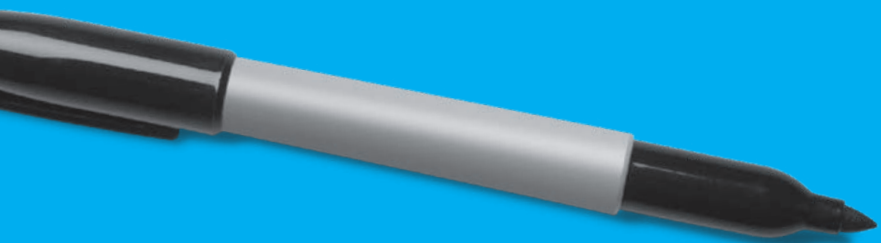


Have
your Say



> How to Make an
Effective Submission



HAVE YOUR SAY

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> INTRODUCTION

What's a submission?

A submission is a formal way to put forward your views on a topic – to make yourself heard.

Organisations call for submissions to gauge public opinion and to refine and improve their plans.

National, regional and local public bodies – like city councils – invite submissions when they are considering major new policies or changes to formal plans. In fact, they are legally required to call for public submissions on some matters – for example, long term strategic or community plans (LTCCPs), annual plans and district plans.

Changes to formal plans usually go through a submission process too – for example, changes to the zoning of land. Councils often call for public submissions when they are developing or changing more specific strategies – for example, disability or youth policies.

The council will usually publish a draft of a policy or an outline of a proposal – then they invite people to send in their views before a final decision is made.

Special public enquiries often call for submissions. For example: a commission of enquiry into a failure by a public agency; a local controversy like graffiti; or the licensing of brothels. Schools and community clubs and societies often call for submissions if they are planning big changes.

A submission can be a letter that explains your views on a particular proposal. But it's best to stick to the requirements in a call for submissions. To make sure your view has maximum impact, make the most effective submission you can. That's what this resource is all about.

(This resource is designed to help you make submissions to any public body, but to keep it simple, we'll talk about making a submission to your "local council".)

Why would you make a submission?

In a democracy, everyone has a right to be heard. We are an open, representative society. You can help keep it that way by having your say.

We elect representatives to make decisions for us – parliament, city councils, etc – but they don't know what people think on every issue. There will be angles they haven't thought of.

You (or your organisation) might make a submission if

- > you feel very strongly about an issue
- > you and your family will be personally affected
- > your business will be affected
- > you are part of a group of people with an interest in a proposal – a community of interest
- > you want to speak on behalf of others who cannot speak effectively for themselves – you might be an advocate for children, animals or the natural environment
- > you have special knowledge or expertise
- > you've thought of an important point that might be missed
- > you want to add your voice to other voices, to show the authorities that a particular view is widely held.

You might make a submission for a combination of reasons.

For example: The council plans to put a one-way bus lane in the main street pedestrian mall. You belong to a group of small retailers who feel their businesses will be affected by the proposal. But your group also has special expertise – you know about pedestrian flows, peak hour traffic, etc. You can also advocate for others – you are concerned about customers with young children and those in wheelchairs.

It's important to think about making a submission if you are in favour of a proposal. If local councils hear only from people who are opposed to proposals, they won't know what the whole community thinks. If you like an idea but know there will be lots of opposition, you might want to make sure supporters are also heard.

You might have views on some parts of a proposal. Many people make submissions on just a few aspects of a policy, aiming to change details, not to oppose it entirely.

Who can make a submission?

Anyone can make a submission on a matter of public interest.

All submissions are accepted regardless of who they come from – so long as they are received by the due date and contain details like your name and address.

Individuals and groups can make submissions. If an organisation has a view on an issue it can make a submission. If you belong to an organisation that has an interest in an issue you might consider making your views heard through their submission.

You could get together less formally with people who feel the same as you do and make a joint submission, especially if you have special knowledge or expertise. You'll need to weigh up the benefits and disadvantages.

Being part of a joint submission could mean less work for you. If you all put your heads together, your argument and evidence should be stronger. Councils notice how many individuals have signed their names to joint submissions, so your individual voice is being heard. In fact your views might have more impact if they are in a joint submission, otherwise the council has to read lots of submissions that make the same points.

On the other hand, you might have to modify your views to go along with the group. The language used might be different from what you'd prefer. You might decide the council would be more persuaded by a larger number of individual submissions.

You could decide to make a submission that endorses submissions you know are coming from others. For example, you might do this if you don't belong to an organisation but you want to support its stand.

How do you make a submission?

Your council will explain how and when to make submissions.

Submissions are almost always made **in writing**. Most large councils provide submission forms to fill in. These are generally available on the council's website. Some councils accept submissions by email or through their websites.

There might also be an opportunity to make an **oral submission** – speaking about your views at a 'hearing' – but usually written submissions are required as well.

Some organisations or groups distribute ‘form letters’ – a prepared statement they ask others to put their names to and submit separately. You need to decide whether or not this is an effective strategy. Many thousands of identical submissions could have an impact – but the people considering submissions might think of them as a single joint submission. And you don’t have the chance to put a personal perspective into your submission.

Do you present just your own views?

Your submission contains your own views but your views will be based on research, even if it’s just reading newspapers or talking with neighbours. If you have consulted other people more formally you should explain that and say how much support you have. You might quote what others have said on the topic or use arguments and evidence that others have developed – but it’s your own views that are important.

If you claim to be representing others – especially an established organisation – you must say exactly who you represent and what authority you have to make a submission on their behalf. If you are making a *joint submission*, make sure everyone involved is named individually. Each person should also sign the submission.

Who will see your submission?

Generally a council appoints a committee to consider submissions on an issue – that committee then makes recommendations to the full council. In Parliament, select committees do this.

Committees often ask council officials to comment on submissions, especially if technical issues are involved.

The council will take into account the reasons and evidence provided, how many people hold a particular view, the views of people most affected by the proposal and the knowledge and expertise of people making submissions.

So a submission from a person who lives in another town might not appear to carry the same weight as a submission from a local ratepayer, but it might contain expert information, an effective argument.

It might seem like a good idea to flood the council with submissions, but councils don't just count numbers for and against – they take note of the arguments raised.

Any submission to a public body can be made public. In some cases it is a legal requirement to publish all submissions at the end of the process, including the names and addresses of people making submissions. It's a way of making the process open and transparent – everyone knows what the council has heard and who said what. You can ask for some of your details, like your home address, to be kept confidential.

How will you know your submission has been received?

An acknowledgement letter will normally also tell you the timeline for the consultation, including the date of any hearing. It will explain arrangements for the hearing, or promise to contact you to discuss these details. Councils normally write again at the end of the process, to tell people who made submissions about the outcome.

An online resource

The Resource Management Act provides a number of ways for you to get involved in council decisions that affect the environment. Go to the Publications section of the Ministry for the Environment's website – *Making a Submission on a Proposed Plan or Plan Change*. (<http://www.mfe.govt.nz/publications/rma/everyday/plan-submission/index.html>)

> GETTING STARTED

If you hear about something you want to have a say on, contact the council concerned to find out how you can make a submission.

Formal calls for submissions are usually advertised in local newspapers – usually in the **Public Notices** section of the classified advertising pages. They will also be announced in newsletters and on news sections of websites. Many councils have a Public Notices section on their websites.

Get a copy of the official call for submissions. This will explain the issue concerned, how to get a full copy of the proposed change and how to make a submission. If it's your local council, go to their website or office, or phone them.

The call for submissions will give you the key requirements. Make sure you follow all requirements – your submission can be rejected if you don't follow the rules.

Usually, a call for submissions will tell you:

- > **the issue** involved and how to get a copy of the draft policy or proposal – some councils provide information in other ways, like public meetings
- > **the date** submissions must be received by – mail it well in advance
- > who to **address** submissions to – often a named secretary, etc
- > what **format** to use – eg typed on one side of A4 paper or on a form provided
- > **the personal details** you must provide – normally your full name, street address and daytime phone number, but there can be other details
- > the **number of copies** you need to supply – councils often need only one or two copies
- > **how to send** your submission – many councils now accept submissions by email or online from their websites
- > whether you can make an **oral submission** at a **public hearing** – and how to make those arrangements.

> GETTING THROUGH

Your aim is to make a difference. You want something to happen – or not happen – so the way you explain your views is crucial.

Here are some basic tips:

Make sure you understand the proposal...

Some proposals are complex. The language used to describe the proposal could be technical. Engineering terms and legal language can be hard to understand. If there's something you don't understand, talk to someone at the council offices. Talk to friends and neighbours to make sure you understand exactly what is proposed.

Be strategic...

Work out what you want to achieve and have a careful think about **the best way of achieving your aim**. Simple opposition might not be the best strategy. The proposal has got this far because enough people see it as a good thing – try to understand their thinking and work out what you can suggest that will achieve your aim and be better for everyone.

Stick to the point...

Your submission must be **relevant** – you must deal with the issue, policy or proposal. You might have a few other things you'd like to tell the council, but this is not the place to say them. Anything off the topic or beyond the scope of the proposal weakens your submission.

Use reason and logic...

State your points clearly and back them up with **explanation, reasons** and **evidence**. You might be making a submission because you feel passionate – and that's good – but saying something strongly and often doesn't make it true. This is not an opinion poll. A submission that leaps from one idea to another and doesn't offer evidence won't have much impact. And don't become abusive – you won't persuade people by insulting them.

Be concise and straightforward...

Your submission should be as **brief** as possible – people who read submissions could be wading through hundreds of them. A good rule is to write just one paragraph to explain each of your main points. Aim for no more than four pages. People who deal with submissions say six pages are seen as a long submission.

Use direct and simple language...

A clever style and complex vocabulary might sound good but your real point could be lost. Remember the people reading your submission might not be as expert as you are. Bullet points work well in this sort of writing, especially to list a number of related ideas.

Be correct and complete...

Double-check all your facts and evidence for **accuracy** – don't just take someone else's word for it. One error could cast doubt on your whole submission. Name your sources, but be brief. **Include everything** you want the council to know. You can't expect them to track down an article or report that supports your argument – summarise its main points. You could attach a relevant section from a report as an appendix, but only if it's really important.

Make it clear what you want to happen – or not happen...

Start with a **summary** of your general position and end with your **recommendations**. Be specific about the parts of a proposal you want changed. If you are addressing a particular section or recommendation of a proposal or policy, quote the title or number.

Get someone to check it...

You might need an expert to check facts for you but it's also important to try your submission on an ordinary citizen – someone who can read it as a council member will.

Get it in on time!

Some councils will accept late submissions, especially if you contact the officials before the closing date. But don't risk wasting your energy by leaving it until the last minute.

> YOUR SUBMISSION

If your council provides a submission form, you just need to fill in each section.

Most forms have limited space to write but you can continue on another sheet of paper. If you know your comments won't fit into the spaces on the form, write your full submission on another sheet of paper. Fill in your personal details on the form and attach it to your submission.

If your council does not provide a form, follow this pattern in your submission:

1 · The details

- > The full title of the policy, proposal, issue or bill you are writing about.
- > The name of body that called for submissions – including the name of the committee if there is one.
- > Your full name, address and business hours telephone number.
- > If you are writing on behalf of an organisation, give its full title and address and explain what authority you have to represent it.
- > Indicate whether or not you wish to attend a hearing to make an oral submission. If you know of other people making a similar submission, you could offer to appear at the same time.

2 · Introduce yourself

Explain very briefly who you are, why you are making a submission, why the reader should pay attention to your views.

For example: I am... a resident in the suburb affected by the plan... an engineer with specialist knowledge of the issue... a parent whose children walk to school... a ratepayer concerned about expenditure.

If you are writing for an organisation, explain the function and purpose of the organisation and why it is interested in this issue.

3 · Summarise your position

Make your position clear at the start of your submission. List the parts or aspects of the proposal you wish to comment on – and say if you are for or against them.

4 · Give your reasons and argument

Explain your reasons for opposing or supporting each aspect you have listed in the summary. You might explain what the consequences will be if the plan goes ahead and suggest other ways to achieve the desired outcome. Give supporting facts, data or information, but do this briefly.

5 · Your recommendations

Be precise about the decision you want the Council to make. You might suggest they delete a section or change some wording. You could even give them the words. You might want them to drop the proposal completely, but it could be more effective to suggest other ways to achieve the outcome they have in mind.

> YOUR ARGUMENTS

Some tips on thinking about issues and making your voice heard:

Understand the big picture...

What is the council trying to achieve with this proposal? If you understand the outcome they want, you might be able to **suggest other ways of getting there**, ways you don't object to.

A proposal to ban traffic from a street aims to safeguard pedestrians in a shopping area - but it could increase traffic on your own street. So you recommend one-way traffic, a pedestrian overpass or speed humps in your street.

Think of other agendas...

What points are other people likely to make – especially those who disagree with you? You need to be ready to **counter opposing views**.

There is a proposal to create a commercial zone in your neighbourhood. Supporters say it will provide employment and reduce commuter traffic. You see their point but know it will also result in heavy traffic and industrial noise. So you recommend limits on the nature of industries that can operate in the new zone.

Do your homework...

Read everything you can find about an issue – talk to people, read recent newspapers and council papers. Find out **what lies behind the proposal**, what discussions led to the proposal. There could be aims and intentions you didn't think of.

The council wants to pipe a stream that runs through your town. They say it will improve traffic flow and create more retail spaces. You see the stream as a feature of the town. It used to be a traditional fishing area. But you know about the problems – rubbish, smells from stagnant water, ducks in the main street. So you recommend diverting the stream to create a controlled pond in a nearby park.

Do some research...

You might have good reasons for objecting to a proposal but you could **find more ammunition**. You might have concerns about the look and feel of a proposal – but there could be good scientific reasons too. Maybe this sort of thing has happened somewhere else. Consult experts. The internet is a good place to start.

A proposal to improve a sports ground includes removing a stand of trees. You object – the trees look beautiful and provide a relaxing backdrop. Your research reveals that the trees were planted by the town's founder – now you have aesthetic and historical arguments to support your case.

It's OK to be positive...

Many people feel moved to make submissions only when they want to stop something from happening. As a result many change processes have a negative tone – everyone seems to have something to grizzle about. It's worthwhile writing in support of a proposal you see merit in – but make sure you **present solid arguments in favour** of the change. It's not enough to say “This is a good idea. I support it”.

The council wants to collect recycling in a different way – plastic one week, glass the next week, and paper the next. They say it will make collection cheaper. You support the plan and point out that it will also encourage people to think about how they package their recycling, so there should be less paper and plastic littering the streets on windy recycling days.

> YOUR ORAL SUBMISSION

Most local councils offer people who make written submissions the option of speaking at a **hearing**. This is known as an oral submission and it gives you a chance to reinforce what you have written.

The acknowledgement letter you receive from the council will probably tell you the date of any hearing and it's common for someone to contact you to discuss details. But if there's a large number of submissions, there might not be time for everyone to speak.

Should you speak at a hearing?

It's up to you. How comfortable do you feel about speaking in public? (Hearings are usually open to the public.) How effective are you as a speaker? Even if you are not a great public speaker, if you have good ideas or feel strongly about an issue you could get your opinions across effectively at a hearing.

An oral submission enables you to express your views in a different way or stress your most important points. The very fact that you go to the trouble to attend in person could persuade a council. Some council members will remember a point better if they can attach a face to it. If you are part of an organisation, appearing at a hearing could be good publicity.

Of course, things could go wrong. A very poor oral submission could undermine your case, even if you made a good written submission.

Hearings also give members of the council a chance to question you about your views. They might have received comments on your submission from council officials. You need to be ready to defend your opinions and further explain your arguments.

Some hints on oral submissions

Understand the environment...

Sit in the audience at a hearing or go to a council meeting. This will help you understand procedures and protocols – you'll also learn something about the people who will be listening to you.

Ask how the hearing will run...

Ask council officials to tell you how many people will speak, who will be on the committee, who chairs it and where you come on the agenda. If you want to hand out copies of additional material, give them to officials (and maybe the media) well before the hearing. Ask if further submissions will be called for. Some councils call for a supplementary submission process after a hearing, especially if there are contentious issues.

Be strategic....

Think carefully about how much you should say and how you'll say it. Would a short, sharp statement have most impact? Or should you be more personal, passionate, humorous, dramatic? How many other oral submissions will there be? How will the members of the committee be feeling by the time they listen to you?

Think about making a joint oral submission...

If other people have made written submissions similar to yours, a joint oral statement could have more impact. The council might feel better about your views if you don't drag the process out. You could all be there to support the person you choose to speak, or you could each say a little.

Arrive early...

Get a feel for the setup, watch how committee members listen and respond to the speakers before you. Then you'll know if your points have been covered or if you should counter some of their arguments.

Introduce yourself....

Make sure everyone knows who you are, why you are making a submission and what your view is on the proposal. If you start with simple, factual statements like this you'll take charge of the situation and feel more calm and relaxed.

Make your strongest points...

There's no need to cover every point in your written submission. Talk about what you think is your most convincing argument. If you want to mention all your points, spend more time on your strongest argument.

Don't just read your submission or make a formal speech...

They've already read your submission and this is the chance to say things a little differently. But there's no need to write and memorise a formal speech. A good oral submission is a mix of informal opening and closing comments with a more formal style for your main arguments.

Be fresh and persuasive...

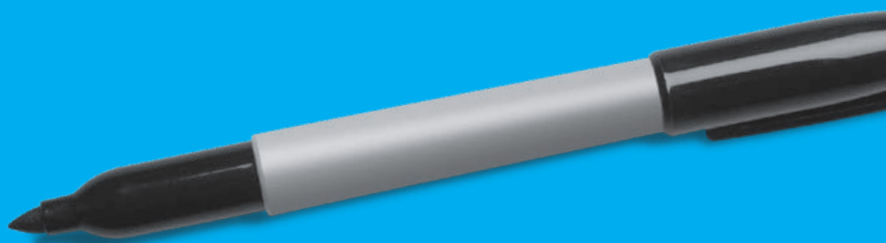
The committee probably has to listen to lots of oral submissions at one sitting, many of them negative. You are at the hearing to make a point, to add impact to what you have written. Find a way to make them sit up and take notice. You could achieve this by being clever, passionate or amusing – but also by being well organised, straightforward, clear and brief. Being positive and cheery could be effective, especially if you are suggesting an alternative way to achieve what the council is proposing.

Be prepared for questions...

The committee might want to question some of your arguments and even debate with you. Think about questions they might ask or issues they might challenge you on. They might have received comments on your submission from council officials. Have more information ready if you think it might be needed. You might want to encourage discussion.

Be prepared for media interest...

Journalists often attend hearings, especially in Parliament and in major cities. But even small local newspapers often have reporters at council hearings. You need to be prepared for media interest during and after the hearing. If you notice television cameras or radio microphones, make sure you present yourself so you'll be effective if you get to air. You might have to speak a little louder and not too rapidly. If your oral submission made an impact, journalists might want to interview you after the hearing. Remember, it's always your decision whether or not you speak to the media. It's probably a question of whether any further comment from you will strengthen or weaken your position.



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