

# Living Streets Aotearoa



[www.livingstreets.org.nz](http://www.livingstreets.org.nz)

## MAKING SUBMISSIONS RESOURCE KIT

This “Making Submissions” resource kit is a tool to help Living Streets members write and present submissions. It is an evolving resource, which we want to be as useful as possible.

We welcome feedback on the usefulness of the kit based on your experiences, together with any suggestions.

The “Making Submissions” resource kit is available on the Living Streets website or from the address below. Please send your feedback to:

### **Living Streets Aotearoa**

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# MAKING SUBMISSIONS

## A. GENERAL INFORMATION

- Submissions are an important part of getting pedestrians' and walkers' needs heard
- You don't have to be technical expert or brilliant word smith to be effective (but it helps for some specialist consultations)
- It is more important to follow a few common rules and add your personal touch

### 1. Types of submissions

- There are three main types of submissions (see Section B below for more information)
- “Numbers Game” submissions
  - *add additional votes of support/dissent to assist decision-makers deliberate*
- Detailed or “Technical” submissions
  - *help agencies produce the best solution*
- Submissions in Person
  - *often additional to a written submission (speaking to a written submission)*
  - *can be strategically useful*

### 2. What can be submitted on

- It's important to be aware of all possible issues that may arise that are relevant to walking **BUT**
- Limited time/resources may mean choosing which issues to submit on and how much effort to put in

### 3. A list of possible Submissions for groups to submit on

- Local/Regional\* Council Annual Plans – these occur annually around March to May
- Local/Regional\* Council Long Term Council Community Plans (LTCCPs) – these are 10 year plans with 3 yearly reviews (occur annually around March to April)
- Regional Land Transport Strategy (RLTS) (5-10 year strategies with 3 yearly reviews)
- Transit NZ's 10 year State Highway Plan and Forecast (and Annual Work Programmes)
  
- Relevant Council Strategies e.g. Walking, Cycling, Active Transport, Transport, Road Safety
- General Roading Projects - these usually impact on walking
- Pedestrian Facility Projects
- Council Policies/Strategies on topics like:
  - Town Centre Redevelopment
  - Parking
  - Traffic or Public Space Bylaws
  - Speed Limit Changes
  - Parks/Reserve Development Proposals
  - Public Transport
  - Recreation
  
- Sport and Recreation Strategies (e.g. Regional Physical Activity Plans)
- District Health Board Strategies (e.g. HEHA Regional Plans)
- Land Use Changes to the District Plan (the Public Notices section of the newspaper lists these)
- Regional Policy Statements (RPS)
- Resource Consents for major developments

\*If your Council is a Unitary Authority there will not be a Regional Council.

#### **4. More about Annual Plans and Long Term Council Community Plans (LTCCPs)**

Councils have to prepare a ten year LTCCP (reviewed every 3 years), under the Local government Act 2002. The LTCCP is the document that presents the blueprint for the future. It describes the ten year community outcomes and priorities, and the activities and funding to achieve the outcomes. The plan includes information on key policies, and is designed to integrate decision-making.

Councils also have to produce an annual plan each year, for adoption before July (the start of the operating year). The purpose of the annual plan is set out in the Local Government Act 2002, section 95.

Submitting on an Annual Plan provides an opportunity to "bump" walking projects up the priority list and to suggest new projects which weren't in the LTCCP. These can arise because of changes in Government policy, such as introducing a Regional Fuel Tax, for example.

When a draft LTCCP or Annual Plan is out for public consultation it is harder to get changes made. It's the lobbying and dialogue while the draft is being developed that is important for getting projects listed and prioritised in the LTCCP, and then in the Annual Plan.

#### **5. How to find out about submissions**

- For a group, it's useful to have someone to coordinate submissions who can:
  - be the contact point for external notifications
  - identify/watch out for issues to submit on (see above for examples of submissions)
  - inform group members about submissions
  - liaise with other groups (swap notes, gain their views, consider joint submissions)
  - delegate/co-ordinate submission preparation (the coordinator doesn't have to write the submissions)
  - control timeliness – this is critical
- Get onto any "Stakeholder" distribution lists - contact organisations and alert them to your group's interest in receiving hard and electronic notification of upcoming submissions
- Some notices only go to those immediately affected (e.g. people living in a street under consultation may be informed, whereas walkers and cyclists passing through the street may not be notified)
- Having regular meetings with key agencies/contacts can help you find out what's coming up, and builds important relationships
- Ensure your group has representation on relevant local committees
- Scan Council meeting agendas on-line for items of interest. Often there has to be Council/Board approval for public consultation
- Keep on eye on the public notices in the classified section of major papers (notices often appear midweek, or important ones in weekend editions)
- Scan Council and other agencies' websites. All Councils should have a "Get Involved"/"Have your Say"/"What's new" consultation web page

#### **6. Timing of regular consultations**

- Get to know the approximate time for regular consultations e.g.
  - Annual Plans and LTCCPs are usually March-May
  - Transit NZ's 10 year State Highway Plan and Forecast is usually March-April
  - RLTS and LTCCP are typically reviewed every 3 years
- Maintain ongoing links with key people (see the Stakeholder Spreadsheet). These include staff at Councils and other organisations, elected people (Councillors and Community Board members), and Resident Groups. This will assist you to have the opportunity for early feedback, and for advance warning about potentially contentious consultations.

- Again, it is better to get input into the development of draft plans before these are out for consultation via contact with key staff. Submissions on documents out for consultation are by their nature reactive. It can be hard to have major influence if a lot of work is already done, as thinking becomes more solidified

## 7. Organising submission for your group

- Have a Submission template (see example provided at the end of this document)
- Have a process in place for developing a submission. For a small group this might be:
  - circulate the draft submission to members
  - receive feedback and comments
  - work in the feedback and, if necessary, re-circulate the draft for further feedback
  - finalise the submission and get sign off from the chairperson or submission coordinator
  - submit by the closing date
  - publish to membership

## 8. Resolving divergent views

- Sometimes there will not be unanimous agreement in the group. Have a clear process to deal with this.
- Make sure everyone knows the process for developing submissions (see previous section)
- Try to get agreement on which issues are important to comment on, even if you can't get agreement on the solutions
- If consensus is not possible provide the case for both opinions e.g. "Generally the group supports option A for the following reasons.....However a number of our members support option B because...We feel you should consider and address these aspects in your decision."

## 9. What is consultation?

- There are a range of types of consultation, so it's important to understand what feedback is being sought. The types include:
  - no fixed proposal, totally open to all ideas and suggestions
  - comments on broad plans/policies
  - feedback on detailed proposals
  - information on pending activities - only minor opportunity to influence implementation
- Remember that while genuine consultation must take account of your submission, the organisation you are submitting to does not have to agree with your requests/proposals
- If you think they have missed the point you might follow up, but don't persist if they obviously don't agree

## B. SUBMISSION TYPES

### 1. "NUMBERS GAME" SUBMISSIONS

#### *General Comments*

- A lot simpler than a detailed/technical submission
- May be a simple email, reply post form or postcard with "I support" or "I don't support"
- Can be taken into account by politicians trying to gauge level of support (though sometimes numbers are given too much importance)
- Can be useful to encourage lots of members to submit submissions in a simple format
- Staff reporting on numbers and comments to elected members varies from place to place

#### *Typical Responses for a simple submission*

- YES, I support (just as important to submit on things you support)
- YES I support in general, BUT...(Add any suggested tweaks)

- NO, I don't support (ideally, provide some reasons why)

### ***General hints***

- Encourage group members to put in submissions by providing email address, website for finding information, and feedback forms
- May be better for people to identify themselves as residents/ratepayers rather than walkers/cyclists
- You can suggest issues to consider but it is best to encourage people to use their own words rather than the same (pro forma) text
- Personal experiences and impacts adds credibility to submissions and implies you are not just submitting because you were told to by a group

## **2. DETAILED OR “TECHNICAL” SUBMISSIONS**

“Numbers will get you the project. Detail will get you a quality project.” (Glen Koorey, 2007)

### ***General Comments***

- These submissions are more difficult but can ensure a better outcome is achieved
- May be better coming on behalf of a group rather an individual, but encourage individual submissions as well for numbers
- Demonstrate a group's value for providing useful feedback, so raising the group's profile

### ***Benefits***

- Provide useful local knowledge pertinent to a project
- Correct factual errors or identify specific problems in the proposal
- Suggest additional features or points for consideration
- Provide good evidence/arguments for/against a proposal (include references)

### ***General hints***

- Identify one person to coordinate/lead the submission (s/he may not write much of it)
- Use a “buddy system” using an experienced submitter to help train up a new person
- Give yourself enough time – this includes background reading, discussion, research, preparing a draft, then receiving and incorporating feedback, and may involve multiple iterations.

### ***Getting feedback for a draft submission***

- A draft submission doesn't have to be fancy - it could just be some thoughts scrawled in an e-mail
- Some sources of help/feedback are group members, other like-minded groups, the Living Streets Aotearoa email discussion group [livingstreets@yahoo.com](mailto:livingstreets@yahoo.com)
- People often find it easier to give feedback then to start with a completely blank slate
- When submitting on a proposal/draft document read it through carefully and ask yourself, “will this make things better for walking and walkers?”

### ***Project design proposals***

- Learn how to interpret plans - most documents for public consultation are reasonably clear but if not, ask for clarification
- Check on the ground – go for a walk in the areas under discussion, imagine how it would look with the changes, and ask yourself, “as a pedestrian, how would I negotiate this site?”
- Identify any specific problems (e.g. service covers, utility poles, and other observed conflicts/issues)
- You don't have to come up with a better solution - that's what the technical people are paid and (hopefully) trained for. It's nice if you can, but the more important thing is to identify any problem(s)
- Use The Pedestrian Planning and Design Guide for checking best practice (on the Land Transport NZ website and Living Streets offices have hard copies)

- Better still, see if the design staff have attended or are interested in attending a “Fundamentals of Planning and Design for Walking” course. This course for planners, designers, engineers, and advocates is Land Transport NZ approved, and aims to ensure that best practice design is used in projects. The Cycling Fundamentals course has been available for a couple of years and the equivalent Walking course will be available in 2008.
- The New Zealand Pedestrian Profile has helpful statistics to support walking initiatives (it is currently being reviewed as a Walking and Cycling Profile and is expected to be ready in July 2008)

### ***Some rules of engagement***

- Type your submission – makes it more readable (use a formal font such as Times New Roman). A professional appearance ensures stylistic issues don’t detract from your message
- If there is a standard feedback form/format, answer the questions provided in the order presented, adding extra comments where necessary
- Stick to the consultation topic - don't rant (but let them know if you think something important has been left out)
- Use reasonably formal language, correct spelling, and good grammar.
- Don’t make abusive comments about people or agencies (you can say that you disagree or are disappointed with a proposal)
- Make sure your submission is well laid out, both visually and logically. Check for errors - factual, spelling, and grammar. Get a couple of people to check your submission - someone who knows about the topic and someone who doesn't
- Send in your submission on time, and apologise if it’s late. Some organisations will grant you an extension if you ask in advance, while others are stricter about closing dates. It may be best to put in a quick general submission and provide more detail when you speak to your submission (if the option of speaking is available)
- Check whether there are multiple consultations phases, and if so, be ready to submit at the next stage

### ***Detailed submission structure***

- A Submission Template can be helpful (see Living Streets Wellington Submission template at the end of this document, also submissions on [www.livingstreets.org.nz](http://www.livingstreets.org.nz) )
- Use letterhead if your group has it, with the group logo,
- The front/title page of submission needs (a) the name of the consultation (what you are submitting on), (b) the recipient of your submission (who you are submitting to), (c) the date and (d) your contact details (name, phone, email, post)
- General Format
  - Start with Introductory Information [see below]
  - Follow with General Comments [see below]
  - Then follow with Specific Comments [see below]
  - Signed by chair or other key group member - state position of the member

### ***Introductory Information***

- Introduction/description of your group
  - Either in the text body or as a footnote
  - Who you represent
  - Your experience - why your view is valid/relevant, why you are specially experienced to comment about this and if possible back up with facts and figures
  - Can add reference to a website for more information
- Note what you have reviewed (e.g. flyer, document, draft proposal/strategy) and information on the process you used for preparing your submission (e.g. on site visit, group feedback)
- Indicate whether or not you want to be heard in person. It’s best to present if you can, so say your group wants to speak to the submission, and you can pull out later if no one is available)

### ***General comments***

- State your general support (or not) for the proposal

- Acknowledge the good, even if you're not in total support
- Mention the common issues/themes identified
- It's worth mentioning related issues outside the scope of this proposal, which should be considered at subsequent stage or as an additional project

#### ***Specific comments***

- Follow the structure/order of the consultation document/feedback form - e.g. repeat section headings and subheadings
- Be specific about where your comments refer to by referencing the specific parts of the consultation document (e.g. Page x Section x.y Paragraph n), quote the extract if necessary, or highlight location on the plan
- Be very specific about the changes you want, and provide wording where possible. This has more impact than vague generalizations about principles
- If you have grave concerns about the thrust of the document, then state your concerns, and where possible suggest viable alternatives

#### ***Submission structure hints***

- If the submission is long (4 pages or more) have a summary of the main points up front (you can also summarise key points at the end)
- Number the pages and use numbered or bulleted items for clear structure
- Use bold to highlight key items or points for easy scanning
- Use photos or other graphics if necessary to help explain concepts
- Back up all assertions where necessary with suitable references (footnotes)
- Be familiar with other related agency documents or official documents so where necessary you can highlight inconsistencies with the proposal
- Invite follow up clarification of any points if necessary
- Personal follow up can be important as the person receiving the submission may be junior, and they may not understand your point
- National organisations such as Living Streets Aotearoa and The Cycling Advocates' Network and some of their local groups have submissions they have made on their websites and these may be a helpful guide

#### **Submission Examples**

1) Living Streets Aotearoa Submissions

<http://www.livingstreets.org.nz/documents.html>

2) Living Streets Wellington Submissions

<http://www.livingstreets.org.nz/wellington.html#submissions>

3) Cycling Advocates' Network (CAN) Submissions

<http://www.can.org.nz/submissions/>

4) Spokes Canterbury (local CAN group)

<http://spokes.org.nz/submissions>

### **3. SUBMISSIONS IN PERSON**

#### ***General comments***

- In a written submission always request the opportunity to present or speak to your submission in person, where the opportunity is available. You can always withdraw later.
- Your submission may be heard by a special hearing panel or at a Council, Community Board, or other agency board meeting
- Don't assume your audience have read or can recall your written submission

#### ***Reasons for submitting in person***

Submitting in person provides strategic opportunities to:

- Enable agencies to become familiar with your group

- Highlight and reiterate key points of your group's written submission
- Provide additional evidence obtained since your group's written submission was made
- Counter likely questions/arguments posed by the hearing panel or other submitters
- Present information better suited to a visual, auditory, or in-person situation
- Have the opportunity to be reported on by watching media (esp. if controversial or dramatic)

### ***General hints on submitting in person***

- Most importantly - make your submission memorable and different from the others, to make an impact and get your message across
- Don't dress too casually ("smart casual" is usually appropriate). The process is usually quite formal
- Be on time or even early (useful to gauge any opposition). If you have time it can be helpful to listen to other submissions before and after your own, to learn about what works with the panel and what doesn't, and what arguments others are putting up that support or oppose your group's submission. Useful information may be gleaned for future submissions
- Don't speak or interject when it is not your turn to speak, however tempting it may be
- Be courteous, don't get drawn into a slanging match. If some of the panel are hostile and trying to provoke, upset, or belittle you, don't get upset. Smile pleasantly and return to your message
- Thank the panel for giving you the opportunity to speak
- Briefly introduce yourself and your group
- One or two people should present - others may be present to show the level of support (supporters cannot speak). It is very useful to have two presenters, even if one is the main (or sole) speaker and the other person provides support in answering questions and adding comments where appropriate. It helps redress the physical numbers imbalance (i.e. a panel of 5-12 people is less daunting when there are two submitters). If possible, have someone with you who can give the message more depth and character as long as it doesn't confuse your message
- Identify your key message and make it as unique and memorable as possible. Stress one or two points only, and make it clear what you want, and keep the "want list" simple
- Don't read your written submission word for word, instead highlight a few key points
- Plan the flow of your presentation to follow the direction of your written submission
- Practice doing a timed rehearsal with someone to check timing, clarity, and delivery style
- Have people help you anticipate possible arguments/objections that might be raised so you are prepared with superb responses and counter arguments. If possible deal with those issues in your presentation
- Speak clearly and modulate your tone to be neutral and not defensive or accusatory. An occasional strong phrase might be used to stress a point
- Use simple, straightforward, ordinary language. Don't baffle with science or talk down to people. Avoid being too technical - you are probably not speaking to experts in your group's area of interest
- Plan to speak for less than your allocated time so the Hearing Panel has time to ask questions. Plan some extra points in reserve in case there is more time available. Have a shorter version in case time becomes restricted - pick out the key points and present them well rather than try to cram it all in. Don't show annoyance if your presentation is cut back - accept they have time pressures
- Illustrate your message with personal stories, anecdotes, and experiences to get the hearing panel interested and on-side
- Use non-oral ways of making a point if these fit in with your topic e.g. bring in a relevant prop, photos, slides, power point presentation, or do a role play. If you want to use power point check if this is allowable and if there is equipment (data projector, laptop, screen) available for use. Don't assume these are permissible or available
- If you want changes to a document, or want to make certain recommendations, make it clear, and if possible provide wording
- Bring multiple copies of any additional evidence - perhaps ring beforehand to find out how many are on the hearing panel and then bring a few extras
- In some cases (e.g. Regional Land Transport Strategy consultations) there may be an officer's

Report that summarises the submissions and the officer's opinion. Read the report – it can give you information about the thinking of the organisation. It may be useful and appropriate to contact other submitters and ask for their support or offer your support for their submissions.

## **C. CONCLUSIONS**

- Submissions don't need to be daunting
- Start with small steps
- Buddy up experienced and inexperienced submitters
- Get help from people and organisations that have lots of experience with submissions
- Accentuate the positive where possible, don't just be a “whinger”

**GOOD LUCK** - good submissions can help change things and make a difference! :)

### **Acknowledgements:**

This resource has been compiled from the following sources:

- Notes from Glen Koorey's Cycling Advocates' Network (CAN) Workshop 2007 - “Creating Effective Submissions
- Axel Wilke's “Effective Submissions” presented to Christchurch City Council in 2003
- CAN User Group Handbook
- Living Streets Aotearoa’s Walking User Group Handbook

Thanks to these people for allowing their material to be used.



## Submission from Living Streets Wellington

To Wellington City Council

on the “Adelaide Road - Planning for the future” document

**Organisation:** Living Streets Wellington

**Contact person:**

**Address:**

**Email:**

**Phone:**

**Date:**

### About Living Streets

Living Streets Aotearoa is a national organisation with a vision of “More people choosing to walk more often”

The objectives of Living Streets are:

- to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners including walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning

Living Streets Wellington is a local group based in the Wellington region and working to make city and suburban centres in the region more walking-friendly.

For more information, please see: [www.livingstreets.org.nz](http://www.livingstreets.org.nz)