



How to Write a Submission

Andy Cockroft
14 August 1998

Yet what else can we infer? Well, you have to know your subject. Of equal importance, you have to know what the opposition are thinking and saying. Research is vital.

Rule 2 Research
 Know both your subject and the opposition standpoint.

The easiest place to gain an insight is at a public meeting if there is one. This is where both government department and your opponents frequently play their hand. Do not get involved. Don't be tempted by all the rhetoric to be dragged into a slanging match with vociferous greenie groups. Remain aloof and impartial. It's a big ask, yet you can learn far more by sitting at the back and taking notes. If necessary, find someone else who can present your case for you, someone who likewise will not lose their cool. Note the reactions to whatever is said and the opposition it attracts. Particularly, note what is the opposition argument.

Rule 3 Don't get involved in heated debate.
 Listen and learn.

So far, all we've looked at is the basics. Yet these basics account for 95% of all the work you need to do as part of your submission. Actually writing the document is the easiest part of all. You've done your homework, you know what the opposition are saying, you know the attitude of the government department and you are going to produce a well researched, well balanced submission, right?

How do I start?

Look first at what NOT to do:

A submission of the form:-

*Putaruru 4WD Club Inc
Box 123
Putaruru*

29 February 1996

*South Waikato Conservation Board
Box 456
Putaruru*

Attn Joe Bloggs

Dear Mr Bloggs,

We object to the closure of the Putaruru Forest for 4WD access.

Fred Grimely

This most simplistic form of submission will rarely have an effect. It is only viable if many hundreds of the same are sent by individuals. You've probably seen these types of things circulated for you to send in to Members of Parliament as part of a National campaign for some cause or another. They succeed only because of a nuisance value. Don't discount their effect if done properly and in sufficient numbers, but it is not really the best way to make a submission on behalf of a Club or Association. You could use them in addition to a more formal submission.

So what are we missing? Well there are no facts. Why do you object? What for? What is the reasoning behind the closure?

Perhaps a little more meat would help:-

*Putaruru 4WD Club Inc
Box 123
Putaruru*

29 February 1996

*South Waikato Conservation Board
Box 456
Putaruru*

Attn Joe Bloggs

Dear Mr Bloggs,

RE :- Proposed Closure of Putaruru Forest to 4WD Access

We note with some concern your proposal to close the Putaruru Forest to recreational four-wheel drive vehicles.

I have been instructed by our Club's Committee to register our opposition to such a proposal.

*Fred Grimely
Club Secretary*

Better? It is certainly more polite, and it includes a heading so at least the recipient knows what the subject matter is. It also announces Fred's position within the Club. Yet it still lacks substance. There is no presentation of your case, no argument as to why the Board should continue to allow you access.

If you'd done your homework, you would by now know that the main reason why closure is being considered is to make it safer for mountain bikes. It is also the only major area of indigenous forest locally available to you.

Could you do better?

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29 February 1996

*South Waikato Conservation Board
Box 456
Putaruru*

Attn Joe Bloggs

Dear Mr Bloggs,

RE :- Proposed Closure of Putaruru Forest to 4WD Access

We note with some concern your proposal to close the Putaruru Forest to recreational four-wheel drive vehicles.

As you may know, our Club uses Putaruru Forest for 4WD recreational activities on a regular basis. It is the last area of Indigenous Forest within local Conservation estate where such activities are permitted. It would be unfortunate if our members were to be denied further opportunity to enjoy this most beautiful of Native Forests

It is also worth noting that the proposed closure is to afford mountain bikes a greater margin of safety.

Locally, mountain bikes have permitted access into ALL conservation land, whereas we remain restricted to Putaruru Forest. It appears inequitable that we should be asked to forsake our recreational interests while mountain bikes may pursue theirs.

I have therefore been instructed by our Club's Committee to register our opposition to such a proposal.

*Fred Grimely
Club Secretary*

OK, so we're getting better. There is still a lot we could say to progress our case however. What else do we know? Has there been a recorded accident between a 4WD and a mountain bike? If not, say so. If there has, who's fault was it? Can we use any of this information to our advantage? If we can, use it. If not, perhaps we may choose not to. If there are problems that cannot be denied, can we offer solutions to mitigate them?

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Box 123
Putaruru*

29 February 1996

*South Waikato Conservation Board
Box 456
Putaruru*

Attn Joe Bloggs

Dear Mr Bloggs,

RE :- Proposed Closure of Prater Forest to 4WD Access

We note with some concern your proposal to close the Putaruru Forest to recreational four-wheel drive vehicles.

As you may know, our Club uses Putaruru Forest for 4WD recreational activities on a regular basis. It is the last area of Indigenous Forest within local Conservation estate where such activities are permitted. It would be unfortunate if our members were to be denied further opportunity to enjoy this most beautiful of Native Forests

It is also worth noting that the proposed closure is to afford mountain bikes a greater margin of safety.

Locally, mountain bikes have permitted access into ALL conservation land, whereas we remain restricted to Putaruru Forest. It appears inequitable that we should be asked to forsake our recreational interests while mountain bikes may pursue theirs.

We know of no major accidents involving 4WD vehicles and mountain bikes, however, there have been numerous complaints from pedestrians regarding the high speeds these bikes attain and the lack of warning of their approach.

Our members likewise are concerned that some of these bikes travel at such high speeds that they could never hope to retain control in an emergency. In many instances mountain bikes are incapable of stopping should they unexpectedly encounter pedestrians or vehicles.

It is our understanding that a general 30kph speed limit applies on all Conservation land, yet this appears to be treated with scant regard by the very group that seeks to impose their own personal safety concerns on others.

If safety is the paramount concern, it would perhaps be more profitable for the various mountain bike clubs to embark on an education programme for cyclists in ALL conservation estate rather than seek to ban other recreational groups from a single forest.

Consequently, we feel the case for closure as expressed by the various mountain bike Clubs to be grossly overstated and ask the Board to retain the status quo and continue to allow our access to Putaruru Forest.

*Fred Grimely
Club Secretary*

Now we're getting somewhere! We have stated our case, we have criticised the opposition, we have argued reasonably, we have offered an alternative. In all this, we have remained moderate yet resolute. Will this have a greater impact? You bet.

Rule 4 Cover all the bases.
 Write your submission covering all the points.
 Criticise (fairly) where you can.
 Offer alternatives

This has been a very simplistic example. In general, there will be many sides, many arguments to consider. Add to that a degree of bias by the recipients and it becomes more complex. However, the basic premise remains the same.

If you have to write a complex submission, it is worth taking the time to plan your approach. There are again techniques to help.

Gather your information together. Collate it into groups and deal with each group separately, linking the arguments together. As a general rule, your submission should contain no more than three main topics. Any more than that and people lose interest. This trio of ideas is a well established concept and with a little practice, you will soon become adept at organising your presentation along these lines.

How do I do it?

Remember, everything is in threes, so we would start with:-

Beginning.	Introduce yourself
Middle.	The main body of the submission.
End	Summarise your stance. Sign on behalf of the Club.

Now look to break the 'Middle' in to three separate categories. But how? Can I do it by topic? Can I do it by personalities? Can I do it by user group? How the hell do I break all this information into three main categories?

One way, rather than looking at all the arguments, you could stand back and look at three things:-

What the opposition are saying. Define the problem.

What you are saying. Define your perception.

A suggested solution. Give the audience a remedy.

Within each of these, divide again into a maximum of say three basic topics. Take the last submission to Putaruru Conservation Board.

What the opposition says:

They say they want 4WDs banned because it's unsafe for them.

What do we say:

They're the ones who travel too fast, there's a 30kph speed limit
We know of complaints from pedestrians.

This is our last block of native forest, they have all the rest.

Suggested solution:

Get the bikes to educate themselves and not blame others.

For each of these, then look to have a beginning, middle and end. These can be a single sentence or for large documents a whole paragraph. When switching subjects, you should also look to a smooth transition, don't simply stop talking about one subject and wade into the next. A few words 'linking' topics together will make the whole thing flow and be more easily read.

Yet, never waffle. Nothing detracts more from a submission than it being needlessly verbose. The reader quickly loses interest and may skim over it missing one vital point out of several irrelevant ones. Be succinct.

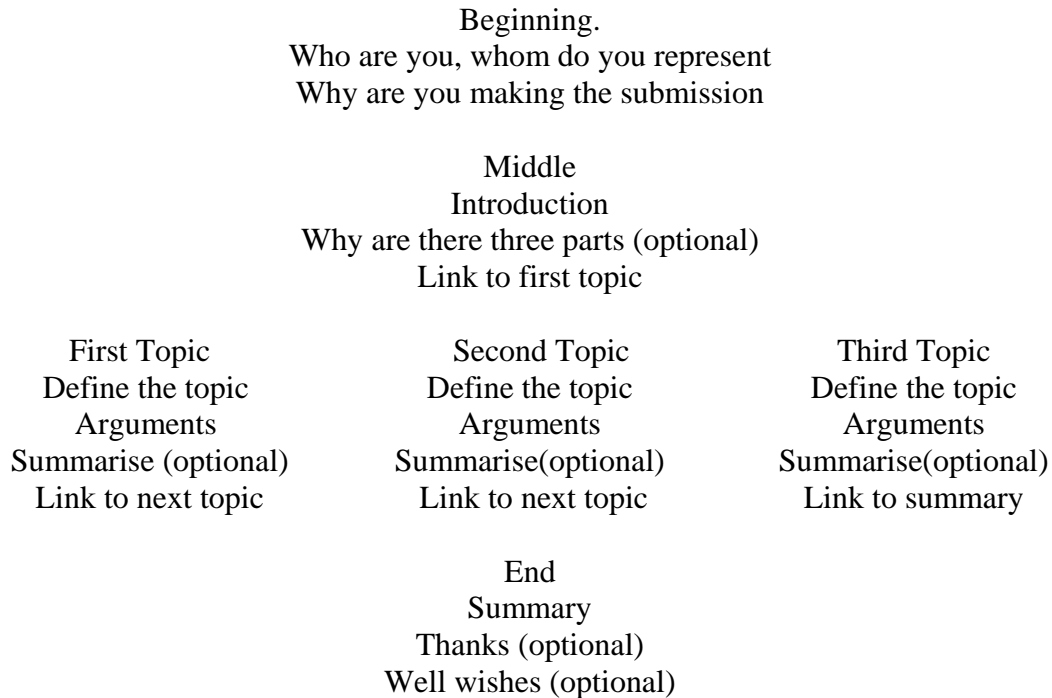
Rule 5 Don't waffle.
 Stick to the point, be succinct

Looks easy, and with a little practice it is, but how does this apply to a more complex argument involving many user groups each with their own perception as to what is wrong and what is the remedy from their perspective.

No matter what the size of your submission, these same rules apply.

Rule 6 Everything is done in threes.

Look at an overall structure:-



If you look at a successfully written (as opposed to successful) submission, you may find it difficult to draw the lines exactly where these breaks in the plan take place, but more often than not they will be there. Formulating your design and then putting it into words are two separate steps and the final document should show little or no overt signs of the structure used. As far as possible, topics should flow together with no sudden change of direction. Lead your readers on a journey, take them along with you.

You will find attached several submissions each with a varying level of success. Look at each and form your own opinion as to why they worked or why they didn't.

All that remains now is style. At the very beginning, I said there is no right and wrong way to write a submission. We each have our own writing styles. None is more correct than the other. Some use more expressive English than others. Some use a very 'tight' writing style, while others are more free or colloquial. At the end of the day, each can convey exactly the same message. Don't be tempted to try and emulate a writing style that just isn't you, it rarely comes off. Be yourself.

Rule 7 There is no right or wrong way to write a submission.

A further topic under the 'style' heading would be reflected in the 'Say It All Up Front' in-your-face approach where you state what you want as part of the introduction, then list

the points you use to support your stance. The alternative is the 'Lets enjoy the view' principle where you slowly but inexorably lay out your arguments one by one, each building on the last to form your case, leading to no other possible conclusion than the one you eventually state at the very end.

Of the two, the former is usually very aggressive and should only be used when up against a biased or even hostile audience. The latter is excellent when you know your audience will be reading the submission carefully from front to back. Of the two the latter is also (usually) less intimidating and moderate. Again though, your own style is far more important than any rules stated here.

Using all we have learnt above, can we re-write the Putaruru submission while still retaining it's impact? Let's have a go:-

*Putaruru 4WD Club Inc
Box 123
Putaruru*

29 February 1996

*South Waikato Conservation Board
Box 456
Putaruru*

Attn Joe Bloggs

Dear Mr Bloggs,

RE :- Proposed Closure of Putaruru Forest to 4WD Access

We would like to thank the Putaruru Conservation Board for allowing us the opportunity to present this submission to your proposal that Putaruru Forest be closed to 4WD vehicles.

The Putaruru 4WD Club consists of some 98 fully paid up members. If we take into account family and friends, this amounts to approximately 300 local residents directly affected by the Board's proposal.

The proposed closure is being considered at the request of the local mountain bike clubs in order to minimise the risk of accidents. Yet we can find no evidence of any serious accident between 4WD vehicles and mountain bikes. There have however been numerous complaints from pedestrians regarding the high speeds these bikes attain and the lack of warning of their approach.

We are likewise concerned that some of these bikes travel at such speeds that they could never hope to retain control in an emergency. In

many instances, mountain bikes are incapable of stopping should they unexpectedly encounter pedestrians or vehicles.

At the Board's own insistence, there is a blanket 30kph speed limit within the forest, yet this appears to be treated with scant regard by the very group that seeks to impose their own self-inflicted safety concerns on others.

Putaruru Forest is the last area of local indigenous forest where 4WD activities are still permitted (mountain bikes however enjoy access to all Conservation estate). It would be unfortunate if our members were to be denied further opportunity to enjoy this most beautiful of native forests.

It also seems inequitable that we should be asked to forsake our recreational activities whilst mountain bikes are allowed to continue theirs.

If safety is the paramount concern, it would perhaps be more profitable for the various mountain bike clubs to embark on an education programme for cyclists in ALL conservation estate rather than seek to ban other recreational groups from a single forest.

Consequently, we feel the case for closure as expressed by the various mountain bike Clubs to be grossly overstated and ask the Board to retain the status quo and continue to allow our access to Putaruru Forest.

*Fred Grimely
Club Secretary*

Did it make a great deal of difference? Perhaps not very noticeable in a simple case such as this, but as a guide for handling long complex submissions you may well find these techniques invaluable.

As a comprehensive example, let's take all these techniques and look at a more complex scenario. If we assume that in the Putaruru example, we know of a recent serious accident involving a 4WD and a mountain biker. In addition, the local DOC ranger is simply looking for an excuse to ban all vehicles from his forest. So much so, that he's taken photographs and blames 4WDs for all the ills of the block, especially track damage.

You on the other hand have done your homework. You know that the local Forest & Bird Society want everyone banned from the area as it's a sanctuary for the black robin and brown kiwi. You've got a tame expert from the local University to prepare a report for you – in your favour naturally.

Let's try once more. This time, we'll look at a different way of dividing our submission. In this example, we have three main categories:- Safety, Conservation and DOC's own agenda. Watch for the divisions – you shouldn't have to look very hard!

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29 February 1996

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Attn Joe Bloggs

Dear Mr Bloggs,

RE :- Proposed Closure of Putaruru Forest to 4WD Access

We would like to thank the Putaruru Conservation Board for allowing us the opportunity to present this submission to your proposal that Putaruru Forest be closed to 4WD vehicles.

The Putaruru 4WD Club are traditional users of the Putaruru Forest. Our membership consists of some 98 fully paid up members. If we take into account family and friends, this amounts to approximately 300 local residents directly affected by the Board's proposal.

The original basis for the current review of vehicular access into the forest was at the behest of local mountain bike clubs following the unfortunate accident involving one of our Members and a cyclist.

However, as part of the review process, other equally significant matters have been brought to our attention at the public meeting held recently at Putaruru Town Hall.

Safety

The proposed closure is being considered following a request from the local mountain bike clubs in order to minimise the risk of accidents. We must state categorically that the unfortunate accident in which Mr Jones was injured was entirely his own fault. Inquiries conducted by both Police and Department of Conservation staff completely exonerated our Mr White of any wrong doing. Mr Jones was travelling at such speed and in such a manner as to be unable to stop when he encountered the Jeep driven by Mr White.

This is not the first occasion our Members have had to take evasive action to avoid speeding bicycles. Unfortunately in this instance, Mr Jones paid the price for his own stupidity.

In addition, There have been numerous complaints from pedestrians regarding the high speeds these bikes attain and the lack of warning of their approach.

We are likewise concerned that some of these bikes travel at such speeds that they could never hope to retain control in an emergency. In many instances, mountain bikes are incapable of stopping should they unexpectedly encounter pedestrians or vehicles. This recent incident demonstrates the point quite clearly.

At the Board's own insistence, there is a blanket 30kph speed limit within the forest, yet this appears to be treated with scant regard by the very group that seeks to impose their own self-inflicted safety concerns on others.

Bio Diversity

Mr Brown of Forest and Bird made it clear that the habitat for the Black Robin and Brown Kiwi is under threat from over use by recreational groups. He did not however quantify which, if any, specific groups were to blame for the diminishing numbers of these species. Nor did he provide any quantitative analysis to back up his assertions.

We have commissioned our own study, conducted by Dr Grey of Putaruru University (report attached) who finds many causes for loss of habitat, not least of which are the selective logging activities conducted further to the north. Add to this his findings of increased predatory activities of both introduced and feral animals and it becomes self-evident that recreational activities are the least of the worries for these endangered species.

Indeed, without motor transport, hunters would not be able to access the more remote parts of the Forest so readily.

The Role of Conservation Staff

It was difficult not to form the opinion that Mr Smith (regional Conservator) was less than impartial in his role as Chair of the recent Public Meeting. This raises serious questions as to the impartiality of the whole consultation process.

When first questioned at the meeting, he supported the closure based solely upon safety issues for mountain bikes. As the meeting progressed, this changed to safety of 4WDs and quads, then finally to one of Conservation. Each time the points were answered, Mr Smith's stance changed.

The only consistency within all Mr Smith's assertions was he wanted the Forest closed! It becomes difficult therefore to answer Mr Smith when we do not know what his real agenda is!

Mr Smith did however raise one salient point, with the production of photographs showing damage to some little-used tracks. These photos were taken immediately following a 4WD trip through the north-eastern section of the Forest. We were not aware of these concerns prior to the Public Meeting, so we had no way of immediately responding to Mr Smith's allegations.

Since that time, we have taken the opportunity to revisit the areas in question and taken a more contemporary set of photos (attached) that show little or no sign of recreational impact.

Who is correct?

Without some qualitative monitoring strategy, it is impossible to state with any degree of accuracy what if any impacts are present. Anecdotal evidence suggests that in fact, the tracks through the whole block are in the most pristine state that many can remember. This despite the fact that DOC have carried out no track maintenance for the past two years due to fiscal constraints.

Summary

There is clearly no case to answer to the original suggestion that the Forest be closed to motorised recreation for safety reasons. If safety is the paramount concern for mountain bike clubs, it would perhaps be more profitable for them to embark on an education programme for cyclists in ALL conservation estate rather than seek to ban other recreational groups from a single forest.

Forest and Bird have overstated their case against motorised recreational vehicles to the exclusion of all other factors affecting the rare species endemic within the Forest. We are naturally sympathetic to the plight of these rare birds, yet feel that other measures such as trapping and baiting predators would be far more effective. Indeed, the withdrawal of motor transport would see a decline in hunter numbers and hence increased depredation of the very wildlife they seek to preserve.

The Department of Conservation as represented by the local Conservator have likewise failed to demonstrate any significant impacts from motorised recreation. The emotive bias demonstrated by Mr Smith with no factual evidence and the 'moving target' of his many and varied excuses serves only to destroy his credibility.

We submit therefore that the Conservation Board should retain the status quo and continue to endorse the use of Putaruru Forest for recreational motor vehicles.

*For and on behalf of
Putaruru 4WD Club*

*Fred Grimely
Club Secretary*

Did that cover everything? Perhaps not, and you might think that more 'meat' is needed in places. That's fine. As stated earlier, there is no right and wrong way to write a submission. Your own personal style may well dictate the addition of other things. The fleshing out in places, and perhaps the condensation of others.

Do take note that there is nothing inherently wrong with criticising employees. If you suspect bias then say so. Should the matter then be referred to a higher authority, you have already documented your suspicions. It can sound like sour grapes to suddenly introduce bias at a later appeal stage. It is far better to get everything out into the open at the very start.

What is quite important, is to get the opinion of your peers. Get someone else to proof read it for you. Listen to their suggestions, both good and bad. Take on board those things that can make a positive difference, but never forget, this is YOUR submission. Do it your way.

Finally, let's look at one other type of submission, the aggressive one. Again, as stated earlier, this is not the ideal. Yet in a situation where you have nothing to lose, it may (just may) get your point across. If nothing else, you'll feel better by having a go.

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29 February 1996

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Attn Joe Bloggs

Dear Mr Bloggs,

RE :- Proposed Closure of Putaruru Forest to 4WD Access

The Putaruru 4WD Club are traditional users of the Putaruru Forest. Our membership consists of some 98 fully paid up members. If we take into account family and friends, this amounts to approximately 300 local residents directly affected by the Board's proposal.

From the outset, we wish to state that we are fervently opposed to the closer of Putaruru Forest to motorised recreational vehicles

We have long held the belief that the local Conservator, Mr Smith has been seeking any means by which to close 'his' Forest to motor

vehicles. This latest incident involving Mr Jones was all that was needed.

We must state categorically that the unfortunate accident in which Mr Jones was injured was entirely his own fault. Inquiries conducted by both Police and Department of Conservation staff completely exonerated our Mr White of any wrong doing. Mr Jones was travelling at such speed and in such a manner as to be unable to stop when he encountered the Jeep driven by Mr White.

This is not the first occasion our Members have had to take evasive action to avoid speeding bicycles. Unfortunately in this instance, Mr Jones paid the price for his own stupidity.

In addition, there have been numerous complaints from pedestrians regarding the high speeds these bikes attain and the lack of warning of their approach.

However, not satisfied with the result of his own Departmental investigation, Mr Smith continued to feed fuel to the debate by calling a public meeting in Putaruru Town Hall.

It was interesting to note the keynote speakers personally invited by Mr Smith were all of a similar mindset; Close the Forest. There was no balanced view expressed from the top table, no call for other interested groups to have input, merely a question and answer session regarding their agenda items.

For this to purport to be a consultation process is farcical.

Mr Brown of Forest and Bird made it clear that the habitat for the Black Robin and Brown Kiwi is under threat from over use by recreational groups. He did not however quantify which, if any, specific groups were to blame for the diminishing numbers of these species. Nor did he provide any quantitative analysis to back up his assertions.

We have commissioned our own study, conducted by Dr Grey of Putaruru University (report attached) who finds many causes for loss of habitat, not least of which are the selective logging activities conducted further to the north. Add to this his findings of increased predatory activities of both introduced and feral animals and it becomes self-evident that recreational activities are the least of the worries for these endangered species.

Indeed, without motor transport, hunters would not be able to access the more remote parts of the Forest so readily.

Mr Smith also tabled a set of photographs taken within hours of a 4WD trip through some of the more remote areas of the Forest. We were not aware of these concerns prior to the Public Meeting, so we had no way of immediately responding to Mr Smith's allegations.

Since that time, we have taken the opportunity to revisit the areas in question and taken a more contemporary set of photos (attached) that show little or no sign of recreational impact.

Who is correct?

Without some qualitative monitoring strategy, it is impossible to state with any degree of accuracy what if any impacts are present. Anecdotal evidence suggests that in fact, the tracks through the whole block are in the most pristine state that many can remember. This despite the fact that DOC has carried out no track maintenance for the past two years due to fiscal constraints.

We find further evidence of Mr Smith's lack of impartiality in his role as Chair of the recent Public Meeting. This unfortunately now raises serious questions as to the impartiality of this whole consultation process.

When first questioned at the meeting, he supported the closure based solely upon safety issues for mountain bikes. As the meeting progressed, this changed to safety of 4WDs and quads, then finally to one of Conservation. Each time the points were answered, Mr Smith's stance changed.

The only consistency within all Mr Smith's assertions was he wanted the Forest closed! It becomes difficult therefore to answer Mr Smith when we do not know what his real agenda is!

There is clearly no case to answer to the original suggestion that the Forest be closed to motorised recreation for safety reasons. If safety is the paramount concern for mountain bike clubs, it would perhaps be more profitable for them to embark on an education programme for cyclists in ALL conservation estate rather than seek to ban other recreational groups from a single forest.

Forest and Bird have overstated their case against motorised recreational vehicles to the exclusion of all other factors affecting the rare species endemic within the Forest. We are naturally sympathetic to the plight of these rare birds, yet feel that other measures such as trapping and baiting predators would be far more effective. Indeed, the withdrawal of motor transport would see a decline in hunter numbers and hence increased depredation of the very wildlife they seek to preserve.

The Department of Conservation as represented by the local Conservator have likewise failed to demonstrate any significant impacts from motorised recreation. The emotive bias demonstrated by Mr Smith with no factual evidence and the 'moving target' of his many and varied excuses serves only to destroy his credibility.

We therefore reaffirm our submission that the Conservation Board retain the status quo and continue to endorse the use of Putaruru Forest for recreational motor vehicles.

*For and on behalf of
Putaruru 4WD Club*

*Fred Grimely
Club Secretary*

These have been examples of how one person may compose a submission. The layout and grammar however will be yours. Nevertheless, the basic guidelines remain the same for everyone.

To summarise then, do remember the basic rules:-

- 1 Be the moderate person. Keep your cool despite any provocations.
- 2 Research. Know both your subject and the opposition standpoint.
- 3 Don't get involved in heated debate. Listen and Learn.
- 4 Cover all the bases. Write your submission covering all the points. Criticise (fairly) where you can. Offer alternatives
- 5 Don't waffle. Stick to the point, be succinct
- 6 Everything is done in threes.
- 7 There is no right or wrong way to write a submission.

If you stick to these simple tips and perhaps more importantly, do your homework, your submission will have a far greater impact with the audience.

Andy