

Key Elements

1. Identify specific provisions opposed and/or supported
2. State whether a provision is opposed or supported
3. Give Reasons for your Views
4. Specify what Decision you want
5. Say whether you wish to attend a hearing & if you want to join others



1. Identify Specific Provisions

Most policy & plans have cascading numbers:

- Choose the level at which you wish to start or enter
- Work down or up
- Stop at the level you best understand and want to change or keep
- Group topics together

Most plans separate statement of issues, objectives and policies and rules or other methods – check each level:

- Issues
- Objectives
- Policies
- Rules & Other Methods



2. Oppose Support Amend

State what is good and is supported – it helps provide a benchmark for the changes you want to make – the 4 “R”s

- What’s good – “retain”
- What’s bad – “remove”
- What needs to be amended – “refine or replace”

Example:
 Issue 1 Natural Landscapes, Indigenous Vegetation etc supported.
 Outstanding landscapes do not take into account landscapes of value to tangata whenua or historic or cultural heritage significance. It’s likely outstanding landscapes could be expanded as a result – refine accordingly.



3. Reasons for Submission

Evaluation of **Issues & Objectives** are different from Assessment of **Policies & Rules & other Methods**

Issues & Objectives:
To what extent does an objective achieve the purpose of the RMA?

Policies & Methods:
Are these the most appropriate way of achieving the objectives?



Objectives

Are appropriate to the extent they are:

- Relevant
- Useful
- Achievable
- Reasonable

& can be challenged on these grounds.



Challenges to Issues & Objectives

Relevancy

- Will it achieve the purpose of the RMA?
- Does the objective address the issue?
- Is that a significant part of the issue?
- Once achieved will it have made a difference?

Usefulness

- What will happen without it?
- How will it help in decision making?
- Does it add value?
- Does it help us better understand what is already in the RMA?



Reasons for challenging Issues & Objectives (cont'd)

Is it achievable?

- Does it say what, where, when?
- Can we tell if its being met?
- Can the Plan be effective in addressing the issue?

Is it reasonable?

- Does the issue need to be addressed in the Plan?
- Can we tell what the issue is?
- Can the objective be more clearly written?
- Is it specific?
- Will it achieve what we want?



Policies & Methods

Whether policies rules or other methods are appropriate depends on the extent to which they are:

Effective – Will it successively achieve the objective in a reasonable time frame?

Efficient – Do benefits out weight costs considering timeframe it will take?

Note: costs can be made up of social economic & environmental factors



Some Relevant Concepts

Lowest possible cost to applicant and public.

Why do floor levels for buildings in existing settlements warrant second tier intervention through Plans when floor levels can be set and imposed under the Building Act?

Transactional costs for resource consents – these work two ways.

Why put the community to the cost of responding to applications for resource consent for mining activities when a prohibited activity status would ensure large earthworks with permanent effects of high potential impact goes through plan change procedure brokered by the Council and its advisers in the first instance?



4. Decision Requested

Clearly articulate the outcome – the result desired.

Have a go at writing in your own words what the new policy and rules should be

Example: Provide a new policy to achieve historic and cultural heritage conservation by waiving development contributions & providing for waiver of bulk and location (including height) requirements.

Add policy xx or the like
Remove Rule xxx & replace with xx or the like.



5. Hearing Attendance & Joining Others

It is an advantage to :

Advise that you wish to attend the Hearing (s) – you can always decide not to later.

Advise that you would consider presenting joint case – it is then possible for you to attend with like minded people and amplify or reinforce each others cases.



Preparing for a Successful Hearing

- Discuss your submission with others
- Join forces with people making similar submissions
- Share ideas and resources
- Allocate tasks - prepare a co-ordinated approach
- Discuss with Council case officer & consider pre-hearing meeting



Avoid

- Being smart
- Acronyms – they irritate & are designed to exclude people who do not know what they mean
- Repetition



What works

- Stay within your area of knowledge & experience **Note:** Your local knowledge is a valuable attribute. Local knowledge and experience is most helpful for better understanding of places, events, cultural, social and historic heritage values.
- Less is more – stay focussed, avoid repetition
- Use pictures, diagrams or models to illustrate a point.



What Works (2)

- Take the time to paint the picture in words, describe the setting, establish the issues, values and/or interests.
- When refuting statements establish the source or basis for making the correction.
- At Council hearings focus on establishing the outcome or result you want & why


