

Guidelines for preparing regional submissions (January 2020)

These guidelines were approved by the Chief Executives Forum on 27 January 2020. They supplement principles and processes for working together that were approved by the Chief Executives Forum and endorsed by the Mayoral Forum in February 2017: <https://www.canterburymayors.org.nz/wp-content/uploads/2017/07/Working-together-for-Canterbury-Feb-2017.pdf>

What is a regional submission?

Regional submissions are drafted for the Canterbury Mayoral Forum, to voice the interests and concerns of the region and its communities.

Regional submissions include:

- Select Committee submissions
- responses to consultation documents issued by Offices of Parliament, public service departments and other agencies of state
- letters to Ministers, party leaders, Members of Parliament (MPs) and senior officials.

The role of the Canterbury Policy Forum

Key reasons for establishing the Policy Forum in 2013 were to:

- identify issues affecting Canterbury and investigate whether they can benefit from collaboration and/or joint advocacy
- reduce duplication of policy effort and work more effectively and efficiently together
- provide support to smaller councils when assessing national and regional policy initiatives.

The Policy Forum is the Mayoral Forum's primary mechanism for developing and consulting with member councils on regional submissions.

Why regional submissions?

A strong regional submission is *effective*. Our experience has been that a comprehensive, evidence-informed, well-argued submission that captures the interests and viewpoints of all eleven councils and is signed out by the region's Mayors and the Chair of the regional council carries considerable weight.

Mayors standing together for Canterbury.

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Working together on a regional submission is also more *efficient*. It enables the participation of smaller councils that might otherwise not have capacity to submit on a particular issue. Councils take turns at 'holding the pen'. And the Office of the Clerk appreciates it when Canterbury councils request a single, joint opportunity to appear before a Select Committee. When we do this, the Select Committee Clerk often provides more time for the Mayoral Forum's appearance and we are generally able to appear by teleconference, saving considerable time and money.

The Mayoral Forum is committed to standing together for Canterbury and speaking with one voice to secure the best possible outcomes for our region and its communities. The Forum accepts, however, that its members and their councils will not be of a single mind on every issue, and that Councils will continue to make individual submissions, as is their right.

The Chief Executives Forum has agreed that as a general rule, Canterbury councils will develop individual submissions supplemented by a robust regional submission prepared by a lead council or councils.

Well-crafted regional submissions reflect majority/minority and dissenting views and do not require unanimity. This adds value to a submission by demonstrating the complexity of issues. The interests and concerns of member councils should be well captured in regional submissions through prior consultation with the Policy Forum, Chief Executives, Mayors and councils.

The good, the bad and the ugly

Regional submissions address interests at various levels – local, sub-regional, regional, South-Island wide and national. While 'standing together for Canterbury', the Mayoral Forum does not take a narrowly provincial approach but advocates for what, on balance, it judges to be in the best interests of Canterbury, the South Island, and the country as a whole. Alignment with the draft submissions and thinking of sector groups (LGNZ and SOLGM) is desired wherever possible.

Effective submissions

Effective submissions:

- are concise – written in short sentences and short paragraphs, in plain English, with no technical jargon, ambiguity or wasted words
- provide brief context and background on the Canterbury Mayoral Forum, how the submission has been prepared, and other parties with whom we have consulted
- summarise key points up front
- provide headings and sub-headings that capture our key points at a glance
- state clearly what we want or support and why – with evidence and reasoned argument
- are concrete and specific in our recommendations about what we do not support and seek to change
- anticipate and address counter-arguments
- indicate clearly what follow-up we desire; for example, an appearance at a Select Committee, or a request to meet with a Minister or senior officials
- are crafted as public records that are fit to be published
- provide contact details for follow-up (usually the regional forums secretariat).

Select Committee submissions

A submission to a Select Committee on a Bill or parliamentary inquiry is treated by the Office of the Clerk as *evidence*. Evidence can be written or oral and is generally released publicly. Select Committee hearings are public and include the media. In certain circumstances, evidence can be *private* or *secret* – this requires discussion with the Clerk.

Submissions are confidential until the Committee releases them. Do not pre-empt this process by releasing a submission or making a media statement about it before it has been heard and released by the Committee.

Further information is on the Parliament website:

- Select Committees: <https://www.parliament.nz/en/pb/sc/>
- the submission process: <https://www.parliament.nz/media/1876/the-select-committee-submission-process.pdf>
- how to make a submission: <https://www.parliament.nz/en/pb/sc/how-to-make-a-submission/>
- submission guide and suggested submission format: <https://www.parliament.nz/media/2019/makingasubmission2012-2.pdf>

The regional forums secretariat supports the Chair of the Mayoral Forum to prepare for Select Committee appearances – in person or by teleconference/videoconference. If you have held the pen on a regional submission, you may be asked to provide some notes and/or appear with the Chair or a lead Mayor when presenting to the Select Committee. See further:

- how to make a submission – including videoconferencing: <https://www.parliament.nz/en/pb/sc/how-to-make-a-submission/>
- submission guide and suggested submission format: <https://www.parliament.nz/media/2019/makingasubmission2012-2.pdf>

Submissions on departmental and other consultation documents

Some proposals on which the Mayoral Forum submits are released by departments or other agencies of state (e.g. the New Zealand Productivity Commission). Check the agency's website for information on how to submit and the timeframe for this. Always plan to submit by the due date.

We have found it more effective to provide a submission in letter form than by completing a web-based consultation form. Difficulties with web forms are:

- they are not easy to consult on within the region and can extend to 10 or more pages
- they tend to steer and invite yes/no responses (with reasons) and don't always provide sufficient space to articulate our regional and sub-regional interests and concerns as we might want to express these.

In your submission, however, make sure you cover off all relevant points from the web form.

Correspondence with Ministers, party leaders, MPs and senior officials

The Mayoral Forum frequently initiates correspondence. Usually the secretariat holds the pen on this, but may consult with Chief Executives, regional forums and working groups on technical content and evidence to inform the Mayoral Forum's advocacy.

Style and format

When preparing a Select Committee submission, pay close attention to the suggested format in the Appendix at <https://www.parliament.nz/media/2019/makingasubmission2012-2.pdf>

The secretariat will format your draft submission onto Mayoral Forum letterhead, to Mayoral Forum style, provide quality assurance of the argument and presentation of the submission and work with you to eliminate the bad and the ugly so it's all good!

Process, consultation and sign-out

First, member councils agree that an issue impacts significantly on Canterbury on a regional or sub-regional basis:

- through the Mayoral Forum, AND/OR
- through Policy Forum horizon scanning of what's coming at us, AND/OR
- by a working group or member council raising it with other councils and/or the relevant Forum Chair, AND/OR
- by the secretariat alerting the relevant Forum Chair, in response to an invitation or opportunity to submit on an issue.

The relevant Forum or its Chair then identifies and commissions a lead council or councils to prepare a draft submission in consultation with member councils – with the support of, and in consultation with, regional working groups as appropriate.

Policy Forum members support the lead council with consultation – engaging Chief Executives, Mayors/Chair and councils to establish any distinctive district/city or sub-regional interests and concerns. Members of the Mayoral Forum will wherever possible discuss regional submissions with their councils. The Policy Forum and Chief Executives have an important role to play in facilitating and supporting this.

The regional forums secretariat supports the process by:

- clarifying timeframes with the lead author
- formatting a final draft onto Mayoral Forum letterhead
- circulating the final draft to all Mayoral Forum members and Chief Executives for prior approval by 'reply all'
- working with the lead council to prepare an agreed final version for signature
- emailing the submission, or lodging it on the Parliament website for Select Committee submissions
- circulating a copy of the final, signed letter or submission to members of the Mayoral Forum, copied to Chief Executives and the Policy Forum
- saving documents into the regional council's document management system and ensuring compliance with the Local Government Official Information and Meetings Act 1987 and the Public Records Act 2005
- publishing submissions on the Mayoral Forum website when they are no longer confidential and have been approved for publication by the Chair of the Mayoral Forum.

As a general rule, regional submissions generally require two and a half weeks for approval. This includes:

- one week for consultation with members of the Policy Forum
- one to two days for revisions
- one week for consultation with members of the Mayoral Forum
- two days for final revisions and sign-out with the Mayoral Forum Chair and other relevant signatories.