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# HOW TO MAKE AN ENVIRONMENTAL SUBMISSION



**JULY 2023**

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**NATURE FORUM**

# INTRODUCTION

Environmental law and policy are helpful tools that we can use to shape regulations and strategies and hold individuals, organisations, and governments responsible for their environmental commitments and impacts. **Public participation is a process through which you are entitled to contribute to decision-making on environmental issues.** This is a right enshrined in national and international law. The [Aarhus Convention](#), of which Ireland is a signatory, grants people the right to access to information, public participation in decision-making, and access to justice in environmental matters.

Strong public demand generated by engaged citizens, students, workers, and activists increases the likelihood that our government will take and prioritise climate action and environmental conservation. That's why we must make use of our right to public participation and engage with public consultations and submission calls.

If you're new to the sphere of public participation, the idea of making an environmental submission to a consultation may seem daunting, but it doesn't have to be. This short introductory guide will provide you with some tips and insights into how you can navigate the public consultation process and make your voice heard. Please feel free to [share this resource with whomever you think will benefit](#).

***How to Make an Environmental Submission is broken down into 4 parts:***

1. Where to find information related to public consultations.
2. Getting started.
3. Writing the submission.
4. Submitting.

# NATURE FORUM

On the 9th July 2022, UCC Green Campus and Cork Environmental Forum ran the first event of our biodiversity coalition initiative entitled '*Making Space for Nature in Cork City*'. The purpose of this event was to bring people together to begin building a coalition of local groups and concerned individuals to protect and restore nature in Cork City.

Given the continued destruction of our ecosystems, needless felling of trees, and reduction of our shared public green spaces, we decided that enough was enough. Biodiversity in Ireland is rapidly declining, and we must ensure that biodiversity conservation is at the centre of all planning and development decisions made by Cork City Council and other key stakeholders in Cork.

This event was just the first step and the Nature Forum has held regular monthly meetings since September 2023. The aim of the Forum is to influence environmental policy on an institutional, local, and national level. Some of the individuals involved with the Nature Forum include members of Cork City Council, Cork Environmental Forum, UCC Green Campus, the Local Authority Waters Programme, and the UCC Students' Union, amongst others.

You can contact the Forum at [makingspacefornature@gmail.com](mailto:makingspacefornature@gmail.com)



# WHERE TO FIND INFORMATION RELATED TO PUBLIC CONSULTATIONS & DEVELOPMENTS

## NATIONALLY

The Irish government has its own [consultation portal](#) where it advertises information related to the consultations that are being run by different government departments and Local Authorities around the country. Using this portal, you can search for particular topics, organisations, and check the status of consultations (whether they're upcoming, open, or closed for submissions).

**An Bord Pleanála (ABP)** is a statutory body that is responsible for making decisions on planning applications and related matters under the Planning and Development Act 2000. Through ABP, you can:

- Submit an [observation](#) on a planning application.
- Use their website to [search cases](#) from 2016 to the present. You can search for cases using an ABP case number, dates, address, or planning authority.
- Make a [planning appeal](#) within four weeks of the planning authority's decision. In general, you can only appeal a planning application made in the first instance to the Local Authority, to ABP, if you have already made a submission or observation to the Local Authority on the application.
- It should be noted that there are different fees for submitting appeals to ABP. You can find a list of fees [here](#).

The **Environmental Protection Agency (EPA)** is an independent public body established under the 1992 EPA Act and advertises information related to consultations on its [website](#).

## LOCALLY

Local Authorities advertise what consultations are upcoming, open, and closed on their websites.

On the **Cork City Council** and **Cork County Council** websites for example, consultations contain general information on the development in question, the deadline for receipt of submissions and observations, where you have to send your submission, and accompanying documents. Once the consultation closes, you can also view the submissions that were received and who submitted them.

Local Authorities are responsible for producing development plans for their local areas. These plans are 'the main public statement of planning policies for your local community'. They must be in line with regional and national planning strategies and members of the public have the right and opportunity to submit observations and make submissions to improve and alter draft plans.

## OTHER SOURCES

- Social media (like Twitter) can be a handy place to find information on recent and ongoing public consultations.
- Some organisations, such as Cork Environmental Forum or Cork City PPN, send out regular newsletters to their members and include alerts of relevant consultations. Identify relevant groups and sign up for newsletters to stay informed.
- More generally, the Office of the Planning Regulator has an informative resource that gives an overview of Ireland's planning system: 'Introducing the Planning System'.

# GETTING STARTED

## **READ THE DOCUMENTS.**

The obvious first step is to read about the submission in question. Consultations can have one (or many) accompanying documents. There will be a description of the consultation and what it seeks to cover, and sometimes technical guidance or maps. You can use the information in these documents to inform your submission.

## **CHECK THE SUBMISSION DEADLINE.**

Get informed and check your deadline. How long particular consultations are open for submissions can vary, so it's important to confirm what date and time your submission is due to make sure you don't miss out.

## **CHECK WHAT FORM YOUR SUBMISSION SHOULD TAKE.**

Before you start, you need to know what format your submission should take. Some consultations allow you to submit through different formats such as emailing a document, filling in an online form, or through a physical letter (and some even give you the option of picking what format to submit through). Choose what works best for you.

Some submissions also require specific information to be included, so read through the submission descriptions carefully. For example, ABP requires that you clearly state your own name and address when appealing a planning decision. A checklist for making an appeal to ABP can be found [here](#).



## **GIVE YOURSELF ENOUGH TIME TO WRITE YOUR SUBMISSION.**

Make sure to set aside time to get your submission done. Nothing motivates like a deadline and sometimes you can't avoid a last-minute submission. However, if you can, try to give yourself enough time to draft your submission, proofread, and submit when you're happy with your work to avoid unnecessary deadline stress.

## **READ OTHER SUBMISSIONS.**

Reading other environmental submissions, especially if you're just starting out, can be a useful way to understand what information people include in their submissions and how they structure them. Even if it's not directly related to the area that you're writing about, it can be helpful to get different perspectives on how people approach public consultations.

Here are some examples of publicly available environmental submissions:

- [EPA](#)
- [Irish Wildlife Trust](#)
- [BirdWatch](#)
- [Not Here Not Anywhere](#)
- [2023 Citizens' Assembly on Biodiversity Loss](#)
- [An Taisce](#)

# WRITING THE SUBMISSION

## **HOW LONG SHOULD IT BE?**

It's important to note that there is no rule on how long a submission has to be. The length of your submission is up to you. You also don't have to address every point or question in the consultation documents. As some consultations can be hundreds of pages long, prioritise what you write about based on your knowledge and use your judgement to make sure you address the most important aspects of the consultation.

## **HOW SHOULD I STRUCTURE MY SUBMISSION?**

Similar to length, how you structure your submission is up to you. You can adopt an essay style, use bullet points, or simple paragraphs to communicate your views on the consultation. If you're citing specific statistics, facts, or the work of other authors, you can include information related to your sources in a footnote.

## **DO YOUR RESEARCH.**

Depending on your existing knowledge, you may have to do some additional research to inform your submission. Double-check your sources and make sure what you're writing is factual and accurate.

## **BE CLEAR, CONCISE, AND STAY ON TOPIC.**

Often, the most effective submissions are those that get to the point. Stay on topic and clearly outline your stance and arguments. There's no need to make your submission long just for the sake of it. Where possible and relevant, it can be useful to include targets in your submission as they can be a good benchmark to measure against final iterations of the strategy or plan in question.

## **DON'T BE AFRAID TO ASK FOR HELP.**

No one expects you to be an expert in everything. Why not ask friends or professional contacts to review your submission draft and share their input? Teaming up with others to write submissions is a good way to capture more perspectives and reduce your workload if you have low capacity.

## **USE YOUR COMMON SENSE.**

Overall, you should use your common sense when making submissions. That means that you shouldn't target specific people or use inappropriate or derogatory language in your submission. Something also to keep in mind is that some submissions are published online after the consultation closes. Other submissions can be acquired through Freedom of Information (FOI) requests. In those cases, the consultation body can remove identifiable details before publicly publishing these submissions.

## **PROOFREAD!**

Remember to proofread your work. Make sure your points are clear and easy to understand. Check your spelling and grammar before submitting.

# SUBMITTING

## **GET IT IN BEFORE THE DEADLINE.**

Make sure to get your submission in before the deadline. If you're late, your submission won't be accepted and your hard work will go to waste.

## **SAVE YOUR WORK.**

Make sure you save your submissions. You can always refer back to your past submissions and use them as a resource when participating in new consultations.

## **OPTIONAL: SHARE WITH OTHERS.**

Sharing your submissions can help others navigate the consultation landscape and help inform their submissions in the future.

## **RECOGNISE YOUR CONTRIBUTION.**

Congratulations! You've made your submission. At the end of the day, it's not about writing the perfect submission, it's about exercising your right to public participation, vocalising your environmental concerns, and working to make our society a sustainable and equitable place for all.

*Happy submitting.*

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**CONTACT: MAKINGSPACEFORNATURE@GMAIL.COM**