

## 9. What is Plain English?

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Writing in plain English means writing in a way that is clear to the readers. Plain English is based on communication principles that require you to write with your readers in mind and with a clear message your readers can understand.

The *Ministerial Direction on the Form and Content of Planning Schemes* directs that a planning scheme or planning scheme amendment... must be written in plain English.

This section takes you through some principles of plain English that should be useful to statutory planners. It is divided into six parts:

- Before you write
- Effective language
- The right words
- Punctuation
- Maps and graphics
- Planning schemes

This section uses examples throughout that illustrate principles of plain English:

- ✓ good examples worth following, and
- ✗ bad examples worth avoiding.

### 9.1 Before you write

#### 9.1.1 Decide your purpose

Think carefully about what you want to say. The purpose of a document determines not only its content but also its format.

#### 9.1.2 Know your audience

Many writers make the mistake of writing about a topic from their own perspective, rather than that of the reader. Before writing, ask yourself the following questions:

- What do my readers already know about this topic? This will give you your starting point.
- What do they need to know for the purposes of this document? This will give you your direction.

By answering a series of questions you can develop a profile of your readers and adjust your writing specifically for them.

- Who reads statutory planning documents?
- Are there different types of readers?
- Will they all read from start to finish?
- What will different readers want from reading the scheme?
- How can my writing cater to the needs of all readers?

You should present material differently for different audiences. Figure 1 shows the same material presented for different audiences:

**Figure 1: Considering your audience**

Audience	Community	Council officers
Issues	<p>Gumnut Council announced today that it had acted to limit further subdivision of the Eastern Foothills area.</p> <p>Councillor Snugglepot said that ‘the community was sick of the local character and environment being destroyed by developments that simply catered for out-of-town commuters.</p> <p>This is a big win for the Foothills and the protection of the values of the area.’</p> <p>The ban on subdivision will apply immediately.</p>	<p>The Environmental Significance Overlay over the Eastern Foothills area was gazetted on 4 March 2007. The Overlay applies a minimum lot size of 4 ha, which will effectively stop all new subdivision.</p> <p>A recent study by Council concluded that increased development in the area was destroying critical habitat of the endangered Eastern Beakless Parrot and lessening water quality in Little Creek.</p> <p>A further study by Council concluded that there was ample supply of rural residential land elsewhere in the municipality.</p>

### How to address your audience

Address your readers directly as ‘you’, then they will know you are referring to them. Refer to yourself as ‘I’ or ‘we’ (if you write on behalf of an organisation).

#### 9.1.3 Refine your topic

Planners often try to say too much and, as a result, important information is obscured by unnecessary information. Clearly identify your main ideas and question everything that goes into a report. If it isn’t important, leave it out or move it to an appendix. Before starting to write, list those things that need to be part of your report or scheme and those that do not.

#### 9.1.4 Develop a sound structure

Planning covers a range of different issues. For instance, traffic problems are also environmental problems, whereas urban design issues are also economic development issues. All issues facing a municipality can be categorised in a number of ways.

While planning issues are multi-dimensional, planning reports and planning schemes are one dimensional. There is just one string of text with a beginning, middle and end. The challenge is to fit a multi-dimensional subject into a one dimensional document.

There are many ways that a document can be organised:

- chronologically
- by process
- from general to specific
- from problem to resolution
- by stakeholders
- by infrastructure elements
- geographically
- by land-use types
- thematically
- alphabetically.

Choose a structure that best suits the issues you are dealing with.

It is important that you are consistent in the way you use themes in your document. For example, if you decide to include an explanation of the environmental, social and economic issues for each of the land use elements in your Municipal Strategic Statement (MSS), then repeat these themes consistently. Other themes should not be added at random.

#### **How to assess the structure of your document**

How easy is it to understand the structure of the text? Can you explain the structure of your MSS and local planning policies in, for example, three sentences?

After setting out the contents, look at the structure analytically.

- Is there balance between the various sections or parts of the document?
- Is there a clear heading hierarchy, and has it been applied consistently?
- Read the headings: do they tell a logical story?
- Do the headings give a clear sense of what each chapter contains and accurately describe the text that follows?
- Is anything out of place?

Finding the logical order for your material might not be straightforward. Sometimes it is only after the material has been written and you're reviewing your work that the structure can finally be settled.

But remember that:

- chapters need to be organised within a document
- sections need to be organised within chapters
- paragraphs need to be organised within sections
- sentences need to be organised within paragraphs.

One way to make sense of the organisation of your document is to print out all the headings in your document so you can see the structure of your text. (Most word processors will let you do this automatically - find out how to use the 'outline' view in the software you use).

### 9.1.5 Use headings properly

Headings provide the skeleton for your document. They help your readers to understand the structure of your document and to navigate through larger and more complex documents.

Each heading needs to be part of a clearly defined hierarchy. Avoid too many heading levels. Three levels should be sufficient for a document; occasionally four may be needed. The levels should relate clearly to each other.

#### **Avoid unfamiliar words, acronyms or abstract images in headings:**

- ✘ The impact of SEPP N1
- ✓ Controls over noise from industry

#### **Avoid vague concepts:**

- ✘ Recommended conceptual development plan
- ✓ What do we want to achieve?

Writing a heading as a question can be a useful technique for assisting readers. Determine what the section is about and then turn this into a question. Keep formatting simple by:

- using a simple font for main headings
- using numbers only for the first two or three heading levels
- avoiding italics and bold styles together
- making lower level headings more like the body text of your document.

Finally, decide whether headings will be:

- presented in sentence case, or
- in Title Case Where the Start of Each Main Word is Capitalised.

Whatever you choose, apply it consistently. Note that in planning schemes, sentence case is used; title case is difficult to apply and difficult to read.

Use the automatic style function on your word processor to:

- define particular styles for headings
- apply these styles consistently.

### 9.1.6 Make sure your document is complete

Make sure that your document is complete. It is not unusual to find planning documents that are not dated or have no obvious author or owner.

Does your document need:

- a title?
- page numbers?
- a date?
- an author - people or department?
- a contact address?

- a contents page?
- a list of figures?
- a bibliography?

For statutory planning documents it is important that the status of the document is clear. Is it:

- a draft?
- an exhibited copy?
- a copy revised after submissions?
- a copy for adoption?
- a copy as adopted?

If parts of a document are likely to be photocopied, this information should be included as a header or footer on each page.

#### 9.1.7 Use an editor

All readers will form their own view about what your text means. An editor can help ensure that there is as little scope as possible for the reader to draw the wrong conclusion. Planning reports and planning schemes are not literature. There can be no room for ambiguity – an editor can help you find that ambiguity.

Develop the practice of asking a colleague to edit your work. Editing each other's work is mutually beneficial and very useful.

An editor may undertake:

- structural editing – looking at the overall organisation of the document and the content
- copy editing – checking grammar, spelling and punctuation; ensuring that a house style has been used correctly and consistently; checking that facts are accurate
- proof correcting—checking a proof of the document for any remaining errors.

A common concern about using editors is that the editor 'will change the meaning'. An experienced editor will usually discuss any changes with the author, so unintentional changes in meaning are unlikely. Remember, if an editor is not able to understand your subtleties and shades of meaning, then how is anyone else?

#### 9.1.8 Develop a house style

A house style is a set of standards for written and graphic communication within an organisation. A house style will ensure that all internal and external documents are presented in a consistent style and layout.

In developing a house style there are a number of important points to work through. It is essential that:

- the house style is developed from recognised sources such as the *AGPS Style Manual* and that it is tested within the organisation
- all users have some introduction to the concept and specifics of a house style
- everybody who needs to apply it has a copy of it

- the house style is presented in an easily accessible format - generally a booklet that is distributed throughout the organisation
- the house style document encourages users to make suggestions and comments
- the house style is easily and regularly updated.

A house style is useful only if it is applied consistently in all internal and external documents.

## 9.2 Effective language

### 9.2.1 Use the active voice

English has two voices - the active and the passive. When the subject of a sentence is acting (doing the action), the verb is in the **active voice**. When the subject is not acting (not doing the action), the verb is in the **passive voice**. The following sentence is in the passive voice:

- Action (subject, not acting) will be taken (verb) against developers flouting the planning regulations (acted on).

In the passive we are able to cut the doer right out of the action. In this example the reader has no idea who will be taking this action against developers. They can probably guess, but it's not explicit. The following sentence is in the active voice, and it's quite clear who will take the action:

- Gumnut Shire (subject, acting) will take (verb) action against developers flouting the planning regulations (acted on).

It is better to use the active voice because it is easier for readers to understand. If we as writers choose to use the passive voice we need to have a good reason for doing so. For example, if we want to focus on the entity in the sentence that is acted on:

- ✓ the Shire's backlog of permit applications (subject, acted on) was cleared (verb) in record time.

Or if the doer of the action is unknown:

- ✗ the Shire's planning office (subject, acted on) was burnt (verb) to the ground last night.

### 9.2.2 Use verbs not nouns

Often writers will package up the action of a sentence into a noun or a noun phrase. These then need to be unpacked by the reader so they can understand our meaning. For example:

Over the next five years, the Northern Valley is likely to be a further zone of major generation of demand for transference of water from existing allocations from the Big Creek.

Who is doing what in this sentence? Well, 'the Northern Valley' is the subject of the sentence, so presumably as a user of water it is able to do something. But what? Perhaps 'generating' or 'demanding' something. It will be clearer to the reader if 'generation' and 'transference' are expressed as verbs. For example:

Over the next five years, the Northern Valley is likely to generate substantial demand for water to be transferred from existing allocations from the Big Creek.

Similarly, it is better to express the noun 'transference' as the verb 'transfer'.

It is important to remember that every English sentence must have a **subject** and a **verb** to be grammatically correct. If we create sentences in which the main action is expressed as a noun, then we still need to put some sort of verb in the verb slot. For example:

- ✗ The Northern Valley is likely to be (verb) ...
- ✓ The Northern Valley is likely to generate (verb) ...

In the first example the verb 'to be' doesn't really carry any meaning; it is an **empty verb**, simply sitting in the verb slot because something has to. All the meaning occurs later in the noun 'generation'.

### 9.2.3 Order ideas logically

Order your ideas in a way that makes sense to your readers. What do they need to know first? For example:

- ✗ Before you fill in this application for a planning permit, read the instructions.
- ✗ Fill in this application for a planning permit after you read the instructions.

What is the reader being asked to do and in what order? If you think about this then you would order the sentence quite differently:

- ✓ Read the instructions before you fill in this application for a planning permit.

### 9.2.4 Make information accessible

A good rule for communicating information is to think of a simple message that can be said in six to seven words and then provide the figures or details to support the fact. For example:

- ✗ Some 18 per cent of the population of Southside are over 60 years of age and a further 57 per cent are aged between 20 and 49 years. Only five per cent of the population is under 5 years. The median age is 34 years.

In this case, the message that the writer tried to communicate was that part of Gumnut has fewer children and young people. An alternative might better communicate the message. For example:

- ✓ Southside has fewer children and young people, but more young adults than the Gumnut average. Only 17 per cent of Southside's population is under 19 years of age compared with 24 per cent for Gumnut.

This sort of information may be even better presented as a graph.

### 9.2.5 Use parallel structures

If two or more coordinated elements (words, phrases or clauses) occur together, they should have the same grammatical structure. For example:

- ✗ Gumnut Shire is faced with a changing demographic as demonstrated by the ageing of the population, young people can't find work here and smaller household sizes are becoming the norm.

It would be much easier for readers to work their way through the reasons for Gumnut Shire's changing demographic if the three elements listed had the same grammatical structure. For example:

- ✓ Gumnut Shire is faced with a changing demographic. This is demonstrated by its ageing population, its lack of employment for young people and its smaller household size.

Using parallel structures is very important in lists and outlines, as well as in sentences. In the preferred example, each of the points in the list is structured in the same way beginning with a verb. For example:

- |  |  |
|--|--|
| <ul style="list-style-type: none"><li>✗ Urban design frameworks are:<ul style="list-style-type: none"><li>■ broad in scale, identifying only the most strategic issues</li><li>■ flexible and not definite</li><li>■ should go beyond just physical issues and take into account other issues such as activities, events, cultural aspects</li><li>■ providing a clear direction to allow development to fill in the detail.</li></ul></li></ul> | <ul style="list-style-type: none"><li>✓ Urban design frameworks:<ul style="list-style-type: none"><li>■ are broad in scale, identifying only the most strategic issues</li><li>■ are flexible and not definite</li><li>■ go beyond just physical matters, taking into account issues such as activities, events, cultural aspects</li><li>■ provide a clear direction, allowing development to fill in the detail.</li></ul></li></ul> |
|--|--|

#### 9.2.6 Place modifiers carefully

Modifiers are words or phrases that give the readers more information about an element in the sentence. For example:

- ✗ Walking into the yard the neighbour's illegal extension could be clearly seen.

This sentence may be quite clear to you (the writer), because you know what you mean. The readers can only guess your meaning from what they see on the paper. The subject of this sentence is 'the neighbour's illegal extension' and it's not capable of 'walking into the yard'. The sentence needs to be recast so that the modifiers clearly relate to the element they are modifying. For example:

- ✓ Walking into the yard the enforcement officer could clearly see the neighbour's illegal extension.

Take care where you place modifiers. Consider the modifier 'totally' in the following sentence:

- ✗ The plan he hoped would work totally eluded him.

Is 'totally' modifying 'work' or 'eluded'? Make sure it's clear which element is being modified. You can do this by placing modifiers as close as possible to the element they modify.

#### 9.2.7 Ensure all sentence elements agree

Agreement helps readers understand the relationships between elements in a sentence. Generally, for example, agreement between a **subject** and its **verb** won't cause any problems:

- ✓ Planners take litter traps very seriously.

We know that the subject 'planners' is a **plural noun** and that we use the form of the verb 'take' with it. We wouldn't write the following:

✗ Planners takes litter traps very seriously.

In this sentence the elements of subject and verb do not agree.

However, the relationship between some elements is not quite so clear - for example, with **indefinite pronouns**, such as 'each':

✓ Each of the overlays addresses a separate issue.

✓ Each overlay addresses a separate issue.

✗ Each of the overlays address a separate issue.

The first example is correct because the indefinite pronoun 'each' is the subject, is singular and demands a singular verb.

**Collective nouns** present a similar problem. For example:

✓ The committee advising the Council on traffic calming voted to disband itself.

'Committee' is one entity although it is made up of a number of members. It is a singular noun and demands a singular pronoun.

One of the most troubling agreement problems is the use of the **third person pronoun 'he'** as a non-gendered pronoun. It is no longer appropriate to use 'he' to refer to both men and women. For example:

✗ A planner is a professional who uses his training together with a degree of discretion when he is assessing planning permit applications.

The problem with the pronouns 'his' and 'he' is that there really isn't a suitable non-gendered replacement, although 'their' and 'they' are candidates. The problem with 'they' is that it is plural and 'he' and 'she' are singular. The best solution is to use a plural noun:

✓ Planners are professionals who use their training together with a degree of discretion when they are assessing planning permit applications.

Using a plural noun is often a good solution, although it isn't always possible.

#### 9.2.8 Keep sentences short

Writers can sometimes fall into the trap of trying to include too much in one sentence or adding unnecessary qualifying or modifying words to simple ideas. Avoid this by reviewing your writing systematically to:

- aim for an average of 15 to 20 words per sentence
- express only one idea in a sentence
- place the most important part of the idea first
- avoid repetition
- use bulleted lists to break up complex information
- use punctuation to clarify sentence structure
- express qualifications or modifications as separate sentences
- put illustrations or examples into separate sentences.

For example, consider the following objective:

- ✘ To reinforce and create residential environments that are economically and environmentally sustainable, liveable, have a sense of place and create these environments based on the integration of physical and social infrastructure and characterised by identifiable neighbourhoods, community focal points, a diversity of dwelling types and household mix and energy efficiency.

This could be better expressed as a series of shorter objectives:

- ✓ To ensure new residential development creates identifiable neighbourhoods that have a sense of place and clear community focal points.
- ✓ To provide a diversity of dwelling types for a range of household types.
- ✓ To ensure the integration of physical and social infrastructure.
- ✓ To create sustainable and liveable residential environments that reinforce the natural values and bay side character of the municipality.
- ✓ To promote energy efficiency in residential development.

Unpacking a long complicated sentence is really the job of the writer, not the reader. See how separating the ideas into a list helps smooth the path through a long sentence for the reader.

Make sure that your sentences are also clear. Lack of clarity can be a problem, even in a short sentence. For example:

- ✘ Each precinct contains different allocations for development rights.

It is certainly short, but not at all clear. A longer sentence is clearer:

- ✓ The amount of development that is allowed varies from precinct to precinct.

### 9.2.9 Write complete paragraphs

Writers should structure paragraphs on the basis of their content and their function. A paragraph can introduce a new idea to the reader, it can illustrate this idea or present a related idea.

A successful paragraph is:

- Complete - providing all the information the reader needs
- Unified - built around a central idea with a consistent tone and point of view
- Ordered - coherent, providing a pattern that makes sense.

You need to make sure that a paragraph gives your readers all the information they need on the topic:

- ✘ It is recommended that Council adopt point 3 and 6 as set out in the above table in accordance with Council's consultation policy.
- ✓ It is recommended that the proposed controls over 42-48 The Boulevard be amended to exclude the stables area from the heritage overlay. Council officers are authorised to engage a heritage consultant to give advice on the stables area. This advice should then be provided to the owner of 42-48 The Boulevard for comment.

Paragraphs need to be unified. They need to stick to the topic, tone and point of view. Decide on a topic for the paragraph and ensure that all the sentences work towards this topic. You also need to maintain a consistent tone within a paragraph, don't move from a formal to an informal tone or change point of view. It is not uncommon, for example, for writers to move from addressing the reader as 'you' to addressing them as 'the reader' - which is confusing.

It is also important that you show the reader how the sentences (and hence the ideas) in the paragraphs are related. These links are the 'invisible glue' within paragraphs. There are a number of ways in which writers show these relationships. Repeating key words is one way of doing this. For example:

- ✓ Costs of paper supplies have increased dramatically this year. As a result, staff have been asked to **restrict** their photocopying to the most important documents. Personal copying is being discouraged. Staff have so far complied with these **restrictions**.

Writers can also use pronouns to refer back to nouns previously used in the paragraph. Similarly, connectors, like the one at the start of this sentence, connect the reader to the previous sentence; this keeps the reader up with the writer. Be sure that your connectors make sense; don't risk misdirecting the reader:

- ✗ Developers are often unsure of council's **policies**. **They** need to be clear about their objectives. **Additionally**, Council officers need to fully understand **them**. It is **also** important that brochures and leaflets are used to explain the policies.
- ✓ **Policies** are often unclear. Make sure **they** express their objectives clearly so that developers and council officers can understand **them**. **Similarly**, make sure brochures and leaflets are easily understood.

## 9.3 The right words

### 9.3.1 Write positively

It is easier for readers to think positively than negatively. They have to untangle the meaning in a negative sentence. If the same sentence is expressed positively it is easier to understand:

- ✗ It is not impossible.
- ✓ It is possible.

Generally, it is better to tell people what they can do than what they cannot. However, take care not to lose the meaning. If somebody writes:

- They are not unwilling to discuss the problem.

He or she may not necessarily mean 'they' **are** 'willing' to discuss the problem.

Don't express questions negatively. Gumnut Shire wanted to know how many residents still had unfenced pools, so they sent out a questionnaire that included the following question:

- ✗ Is your pool unfenced?    Yes     No

When council officers went to inspect these properties they were surprised at how many people had answered incorrectly. Gumnut rewrote the question using positive words:

✓ Is your pool fenced?      Yes       No

Don't use multiple negatives that pile up until the sentence is impossible to decipher:

- ✗ I do not say that there are no buildings in the relevant policy area that are not being used for purposes which are not ancillary to predominant uses that are discouraged by the policy.
- ✓ Some buildings in the policy area are being used for purposes contrary to policy.

### 9.3.2 Avoid unnecessary words and information

Avoid **unnecessary words**. Writers often think as they write. For example:

- ✗ New buildings, and alterations and additions to existing buildings should be designed in accordance with the relevant requirements of the Gumnut Design Manual.

In this passage there are many unnecessary words:

- 'new buildings and alterations and additions to existing buildings' - using just 'buildings' does not narrow the application of the requirement.
- 'be designed in accordance with' - this can be replaced with 'meet'.
- 'relevant' - either it is obvious what is relevant in the guidelines, or there is a need to specify which requirements apply.
- ✓ Buildings should meet the requirements of the Gumnut Design Manual.

Avoid using phrases where one word would do. For example:

- |                                    |           |
|------------------------------------|-----------|
| ✗ prior to                         | ✓ Before  |
| ✗ with the minimum of delay        | ✓ Quickly |
| ✗ meet at an agreed time and place | ✓ Meet    |
| ✗ in the majority of instances     | ✓ usually |

Avoid using **doublets** and **triplets**. These were popular in legal writing when a French and Latin word was used for the same concept - for example, 'cease and desist', 'grant and demise'. However, doublets and triplets such as the following should not be used:

- ✗ safe and sound
- ✗ pure and simple
- ✗ preserve, maintain and care for
- ✗ refuse and rubbish

Avoid **empty phrases** that just hedge around the topic; say what you mean. For example:

- ✗ This letter is to notify you of ...  
doesn't add any useful information.

However, don't make the mistake of deleting linking words that help the reader see the connections between sentences or paragraphs. In the following example, 'similarly' makes the relationship between the two sentences clear to the reader:

- ✓ Retail floor space in Gumnut CAD will increase by 20 per cent from 2000 to 2010. Similarly, the number of car spaces will increase from 1250 to 1500 spaces.

### 9.3.3 Use simple and common words

Use simple and common words to express your ideas. For example:

- |   |  |
|---|--|
| ✗ Pursuant to our agreement...                        | ✓ As we agreed...  |
| ✗ Your permit would normally be deemed to have lapsed | ✓ We would normally consider that your permit has lapsed |
| ✗ Shall   | ✓ must   |
| ✗ as-of-right   | ✓ no permit required                                     |
| ✗ owing to the fact that                              | ✓ because  |
| ✗ with the exception of                               | ✓ except for   |
| ✗ administer  | ✓ manage   |
| ✗ consecutive   | ✓ following  |
| ✗ a number of   | ✓ several  |

Avoid using French and Latin words in your writing. For example:

- |               |  |
|---------------|--|
| ✗ inter alia  | ✓ among other things                       |
| ✗ per annum   | ✓ by the year                              |
| ✗ prima facie | ✓ at first appearance/before investigation |

Of course, some French and Latin words are widely used in everyday language - 'de facto' and 'rendezvous'. Use them if you can be sure that your readers will understand them.

### 9.3.4 Use reader friendly language

Don't try to impress your readers with over-blown language. For example:

- ✗ What are the key result areas for the application of a system of planning? They include housing stock adapted to the needs of the users and providing opportunities for disease management together with a properly designed street network with adequate capacity. Also included are a reduction in the adverse impacts of noises, air emissions, inappropriate signage and other adverse impacts of urbanisation that result from an inadequate system of regulation and/or a lack of engagement of the community. It is considered that economic development is an underpinning goal of urban planning but achievement of this goal must be balanced against the wider goals of public health impacts, infrastructure efficiency and visual amenity.

When John Burns, author of the 1925 English Town Planning Act, stated the purpose of planning, he did so clearly and forcefully:

- ✓ What is our modest object? Comfort in the house; health in the home; dignity in our streets; space in our roads; and a lessening of the noises, the smoke, the smells, the advertisements, the nuisances that accompany a city without a plan because its rulers are governors without ideas and its citizens without hopeful outlook and imagination. Industry is the condition of a city's being; health, convenience and beauty the condition of its well-being.

One technique for writing in user-friendly language is to develop a clear sense of the sort of place you want to create. Try to imagine what that place will look like, what it will feel like to walk or travel in. Then write what is actually important about the place. Keep things concrete and realistic - write that the Council aims:

- ✓ To ensure that new buildings do not block views to the Norfolk Island Pines along Quay Street.

because your readers, whether they agree or not with the objective, will know what you want to achieve. They won't know this if you write:

- ✗ To preserve the valued landscape features and traditional vistas.

### 9.3.5 Use jargon carefully

Jargon is specialised vocabulary. It may be appropriate if you are writing for specialists. If writing for planners, you wouldn't use:

- ✗ uses that do not require a permit under the planning scheme.

when you know planners will understand:

- ✓ as-of-right uses.

Always use language your audience will understand.

## 9.4 Punctuation

### 9.4.1 Use a style guide

While the extent to which you punctuate is generally a matter of individual style, there are a number of conventions that can enhance the clarity of your writing for the reader. It is worth developing a style based on these as quirky punctuation will trip up the reader just as quirky spelling will. Choose a good style guide and use it to check how and what you should punctuate.

The current edition of the *AGPS Style Manual* is a well recognised reference for punctuation conventions and guidance.

### 9.4.2 Punctuate for meaning

Punctuation affects meaning and needs to be placed with care and insight. Where it is placed depends on the grammatical structure of the sentence.

#### **Are commas 'breathing marks'?**

Perhaps you have been told to use a comma where you would take a breath. This is not good practice and can lead to misuse. Don't worry about the health of your readers; they will breathe without you showing them where.

### How can I tell if the commas are in the right place?

**Don't place a comma between the subject and verb.** For example:

- ✗ Writers who don't pay careful attention to punctuation, will find themselves making mistakes.

**Don't place a comma where it will break up the main clause of your sentence.**

Do not place a comma where it will separate subjects and verbs, verbs and objects, prepositions and objects:

- ✓ The objectors acting on their own initiative (subject) have lodged (verb) an appeal (object) against (preposition) the development (object of preposition).
- ✗ The objectors acting on their own initiative, have lodged an appeal against the development.
- ✗ The objectors acting on their own initiative have lodged, an appeal against the development.
- ✗ The objectors acting on their own initiative have lodged an appeal against, the development.

**Do not separate clauses with commas if they are referring to the same subject.**

Separating them with a comma breaks up the meaning in the sentence:

- ✓ The application was refused but it had some merit.
- ✗ The application was refused, but it had some merit.

**Do use a comma to separate clauses with different subjects when these clauses are linked in one sentence:**

- ✓ The application was refused, but the invitation was accepted.

In this example the comma divides the two clauses – this works because they are each meaningful in their own right and they are talking about different things.

**Do use commas in sentences to stop the reader misreading the sentence:**

- ✗ If you keep your audience in mind as you write your document should be reader-friendly.
- ✓ If you keep your audience in mind as you write, your document should be reader-friendly.

### Can I use commas to fix long sentences?

**Don't use commas to try to fix poor sentence structure.** Just because a sentence is long does not mean it needs a comma. The problems with the next example need more than a comma to fix:

- ✗ The proposal to increase the minimum floor area requirement of extensions to dwellings in the Farming Zone to enable farmers with small land holdings to introduce proper environmental practices in line with council's policies was refused.
- ✓ The proposal to increase the minimum floor area of extensions to dwellings in the Farming Zone was refused. The proposal was made to enable farmers with small land holdings to introduce proper environmental practices in line with council's policies.

### How do I add essential and additional information?

**Use a comma to divide introductory information from the main clause of the sentence.** For example:

- ✓ Following a detailed assessment of overshadowing, the application was refused.
- ✓ The application was refused, indicating sound planning practice.

**Use commas to mark off non-defining phrases or clauses but not defining phrases or clauses.** For example:

- ✓ The application, which was poorly documented and presented, was refused.
- ✓ The application that was poorly documented and presented was refused.

### When do I use a colon or a semi-colon?

**Use the colon to 'announce' or 'introduce' an explanation, clarification, interpretation, amplification, illustration or quotation.** For example:

- ✓ The Big Creek Catchment Management Authority's vision for Big Creek is simple: 'a healthy river'.
- ✗ The Big Creek Catchment Management Authority's vision for the Prescribed Watercourse is simply 'a healthy river'.

**Take care not to use the colon between a verb and its object.** For example:

- ✗ The main disadvantages in working as a planner are: poor posture, bad eyesight and occasional bruising.

**The semi-colon is used to pull together and contrast two independent clauses – use the ';' where you could use a '.'.** For example:

- ✓ Incorrect use of the semi-colon is common. Many writers are at fault.
- ✓ Incorrect use of the semi-colon is common; many writers are at fault.

### Choosing between 'which' and 'that'

In the two examples above the use of punctuation together with the choice between 'which' and 'that' affects the meaning of the sentences. In the second example 'that' is specifying which application was refused; in the first 'which' is simply introducing additional information about the application.

When making an essential qualification use 'that'; use 'which' when providing additional information. The use of 'which' and 'that' can be difficult to master. In most cases using one in place of the other does not alter meaning but in some cases it will. How do you interpret the following criteria?

- Indigenous trees, which have low water requirements, should be used in landscape areas.
- Indigenous trees that have low water requirements should be used in landscape areas.

A simple test is to imagine the sentence without the element between the commas and see if it still has the same meaning.

### How do I punctuate between independent clauses?

**Don't use a comma between independent clauses.** Clauses that can stand alone as sentences are **independent clauses** – you can't make them into one sentence with a comma. If clauses are not joined by the coordinating conjunctions 'and', 'or', 'but',

then they must be separated by a semi-colon or a full stop; a comma will not do. For example:

- ✓ The application was contrary to every objective. Indeed, the application was refused.
- ✓ The application was contrary to every objective; therefore, it was refused.
- ✗ The application was contrary to every objective, indeed, it was refused.
- ✗ The application was contrary to every objective, it was refused.

#### **How do I punctuate a list using commas?**

In punctuating a list you need to ensure that the items in the list are clearly delineated.

**Use a comma to separate items in a list.** For example we might conclude that planners need three things to work effectively: (1) background music, (2) a large airy office and (3) a tree outside the window. We can write this as:

- ✓ Planners need background music, a large airy office and a tree outside the window.

**Don't use commas before or after a list.** For example:

- ✓ Background music, a large airy office and a tree outside the window are rare features in the work place.

**Use a comma to separate adjectives that could be joined by 'and'.** If you can write:

- ✗ Planners are always energetic and positive and happy.

then you can write:

- ✓ Planners are always energetic, positive and happy.

Don't use commas to separate pairs of words or phrases that are joined by coordinating conjunctions. For example:

- ✗ Planners are characterised by dedication, and enthusiasm.
- ✓ Planners are characterised by dedication and enthusiasm.

#### **When do I use semi-colon?**

**Use a semi-colon between items in a list that already have internal punctuation.** If you have already separated items in a list with commas and you want to group these items, then semi-colons will make your meaning clear to your readers. For example:

- ✓ He was sent to the shop to buy apples, oranges and pears; carrots, peas and potatoes; flour, rice and sugar.

### 9.4.3 Punctuate consistently

There are a number of punctuation conventions that cover:

- ! exclamation marks
- ? question marks
- hyphens
- en dashes
- em dashes
- ... ellipsis
- ' apostrophes.

Use your style guide and house style to set out accepted uses for these punctuation marks and apply them consistently.

One of the greatest areas for inconsistent punctuation is in bulleted lists. In using bulleted lists decide how to punctuate the ends of the lines in the list. Some writers choose to use open, unpunctuated lists and others use closed, fully punctuated lists. This should probably be spelt out in your organisation's house style. But whatever you choose to do, do it consistently.

Closed punctuation	Open punctuation
<p>In development a house style you should:</p> <ul style="list-style-type: none"> <li>■ use recognised references;</li> <li>■ consult with colleagues;</li> <li>■ trial the style;</li> <li>■ request feedback;</li> <li>■ ensure everyone uses the style; and</li> <li>■ revise the style regularly</li> </ul>	<p>In development a house style you should:</p> <ul style="list-style-type: none"> <li>■ use recognised references</li> <li>■ consult with colleagues</li> <li>■ trial the style</li> <li>■ request feedback</li> <li>■ ensure everyone uses the style</li> <li>■ revise the style regularly</li> </ul>

In planning schemes bulleted lists:

- Are introduced with a colon.
- Start each point with a capital letter.
- Sometimes have more than one sentence in a bulleted point. This is when additional clarification is required.
- Use a smaller dot point, when necessary, that:
  - Is indented further.
  - Uses a full stop as a bullet.
- Do not use 'and' or 'or'.
- End each point with a full stop.

See the style sheet in the *Ministerial Direction on the Form and Content of Planning Schemes* for the requirements for a planning scheme page. Use the templates provided on the DPCD website and with the VPP on CD when preparing planning scheme pages.

## 9.5 Maps and graphics

### 9.5.1 Use diagrams and graphs for complex ideas

Diagrams can synthesise complex processes or assessments and graphs can communicate complex information in a simple fashion.

The test of a good graph or diagram is how well it communicates its message, not how attractive it looks.

### 9.5.2 Make maps clear

You may need to include a map in a report or as a schedule to a zone or overlay in a planning scheme amendment.

Poor quality drafting and drafting that fails to reproduce properly in black and white are the two most common faults with maps. Overcome some of these problems by using a good quality base map.

Prepare plans in black and white. If in colour, make sure that the map is still readable in black and white. One way to do this is to produce a black and white map and then colour it. With a little experimentation you should be able to produce a colour map that photocopies well in black and white.

### 9.5.3 Include all relevant information

A map should include:

- a title
- a scale
- a north point
- a legend
- sources and references if appropriate.

North should point to the top of the page. If using a different orientation to fit your details into a page, then make sure that you use a consistent treatment throughout your document.

















A visual scale is better than a written scale because plans can be photocopied, scanned or downloaded at an enlarged or reduced scale.

### 9.5.4 Make information accessible

Colours or symbols used on maps should be distinct. It should be easy to match the colours on the map to the legend. Figure 2 shows two examples of map legends.

There is a visual logic and consistency in the right hand example in Figure 2. The more densely settled areas are darker on the plan, and the less dense areas are lighter. Different hatching patterns aid interpretation, but the overall message is communicated by how dark areas appear on the plan. Similarly, in the right hand example proposed and existing paths are shown in the same way for bicycle and walking paths.

**Figure 2: Make legends meaningful**

✗ Example legend	✓ Example legend
<p>People per sq km</p> <p> 7 500 or more</p> <p> 4 000 – 7 500</p> <p> 2 000 – 4000</p> <p> Less than 2 000</p> <p>Path network</p> <p> Existing walking path</p> <p> Proposed walking path</p> <p> Existing bicycle path</p> <p> Proposed bicycle path</p>	<p>People per sq km</p> <p> 7 500 or more</p> <p> 4 000 – 7 500</p> <p> 2 000 – 4000</p> <p> Less than 2 000</p> <p>Path network</p> <p> Existing walking path</p> <p> Proposed walking path</p> <p> Existing bicycle path</p> <p> Proposed bicycle path</p>

9.5.5 Make the message accurate

Information must be accurate. It is easier to mislead your reader using graphs than text, because the overall visual message and the related factual information can be quite different.

**Figure 3: Which graph tells the truth?**

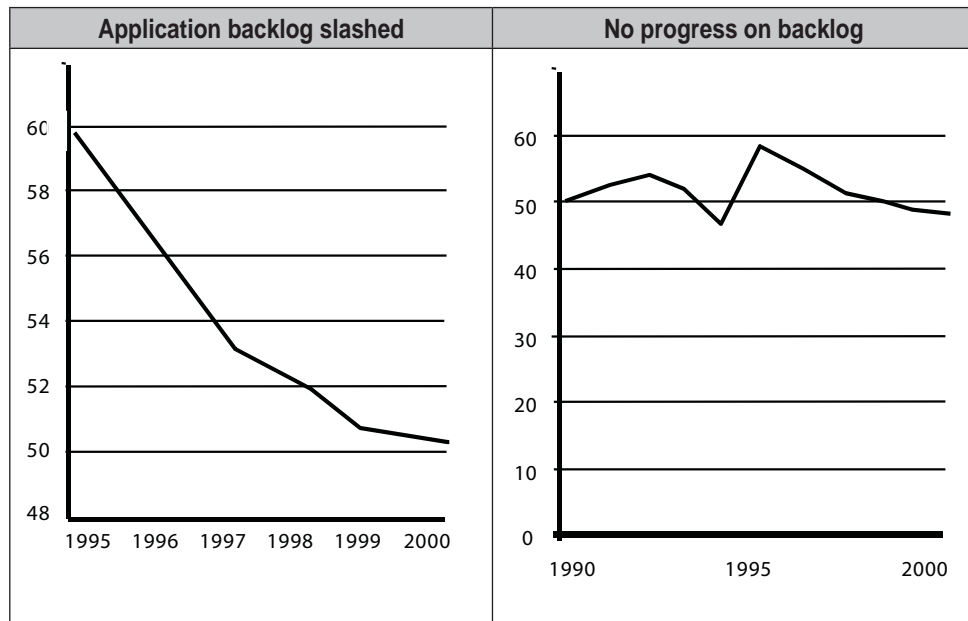
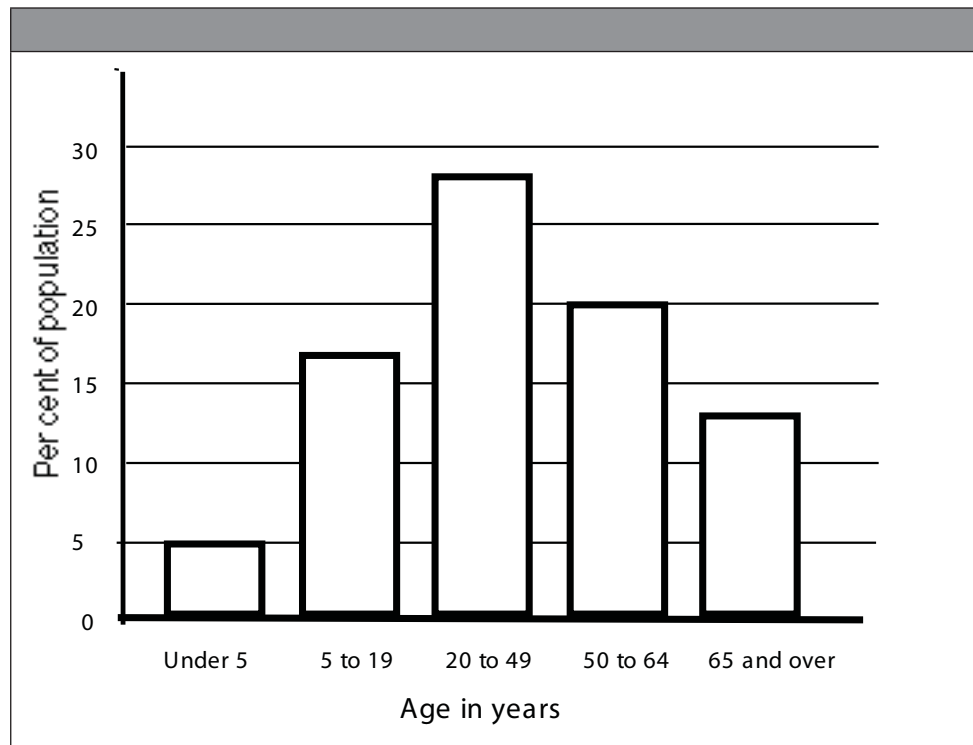


Figure 3 shows two graphs that present the same data in different ways. The graph on the left conveys the information, but it is misleading.

### 9.5.6 Check your graph is meaningful

The graph in Figure 4 is essentially meaningless. Because the age groups chosen do not have the same number of years, comparison between one bar on the graph and another makes no sense. This defeats the purpose of using a graph for this sort of information.

**Figure 4: A meaningful graph**



## 9.6 Planning schemes

### 9.6.1 Use accepted forms of expression

The elements of planning schemes - 'visions', 'objectives', 'strategies' - have different forms of expression and serve different roles. An MSS, local planning policy and schedule will use different forms of expression to suit the particular element's function in the scheme. That form of expression should be used consistently.

**Visions** are statements or descriptions of the type of place council seeks to create. For example:

✓ Gumnut's vision for the Small Hill Nature Reserve is a secluded natural valley.

**Objectives** are the planning scheme's aims for development that flow from the vision.

Objectives should begin with the infinitive form of the verb and should follow from the statement:

'Council aims ...'

- ✓ To preserve and enhance the natural values of the Small Hill Nature Reserve.

Some purported objectives are really the means to some other objective that is not spelt out. For example:

- ✗ To control the removal of native vegetation in the Small Hill Nature Reserve

does not say why vegetation removal is to be controlled. The objective should communicate the broader reasons why council wants to control removal of native vegetation; seeking the control is not an objective in itself.

Some purported objectives are really actions or contain actions – all objectives should allow for a variety of strategies to achieve the objective.

**Strategies** are ways of achieving the objectives. Strategies should be able to follow from the statement:

‘The responsible authority will ...’

- ✓ Ensure new development does not intrude into the skyline of the Nature Reserve valley.

An **implementation method** states how the strategy will be achieved. Implementation methods should follow from the statement:

‘These strategies will be implemented by ...’

- ✓ Applying a Design and Development Overlay to the land around the Gumnut Nature Reserve.

**Decision guidelines** are expressed as a list of ‘things’ that the responsible authority must consider. They are not objectives or requirements. They are nouns or noun phrases. They often start with ‘the’ but this is not always the case:

- ✓ Before deciding on an application a responsible authority must consider:
  - the views of the proposed development from Misery Bend
  - the effect of the proposal on the habitat of the Striped Legless Lizard.

**Criteria** and **standards** provide a basis for judging whether the objectives have been met.

Criteria or standards are expressed using ‘should’ where they are not mandatory and ‘must’ where they are. Typical examples are:

- ✓ A safe, shared path should be provided along the edge of the Small Hill Nature Reserve in urban areas.
- ✓ Material used on the sides of buildings facing the Small Hill Nature Reserve must not include reflective materials, illuminated elements, bright colours or signage.

Criteria and standards should stand alone as complete and properly formed sentences and they should be confined to a single issue.

**Design suggestions** provide ideas about how the criteria or standard might be met.

They are suggestions not requirements and should be written as suggestions. They should be able to follow from the statement:

‘Council suggests that in your design you ...’

- ✓ Place electric power lines and telephone lines underground.
- ✓ Avoid blank walls along the edge of the Small Hill Nature Reserve.

**Techniques** describe a particular way of achieving criteria and objectives. They can be thought of as a physical description of development that meets the criteria. For example:

- ✓ Fill batters are less than 1 in 5 for grassed slopes and 1 in 3 for vegetated slopes. If no alternative is available, they are benched with benches no more than 1.2 metres high and at least 2 metres wide with a top setback of 3 metres.

### 9.6.2 Keep objectives and strategies separate

It is confusing if objectives in one part of a document are generalised while in another are quite specific. For example the following two objectives do not sit well next to one another. One is quite specific; the other very broad:

- ✗ To promote innovative industries in Westville.
- ✓ To increase school after care services on Fridays.

One way of moving from broad objectives to specific implementation methods is to repeatedly ask 'how?' For example, you might know what your overall objective is but be unsure what implementation methods are needed. For example:

#### **Objective**

- To return Gumnut Lakes to a more natural state.

#### **How?**

- By clearing Gumnut Lakes of litter.

#### **How?**

- By reducing the amount of litter washed from Gumnut streets into the lake.

#### **How?**

- By ensuring litter traps are constructed on all new drains.

To progress from an implementation method to an objective we repeatedly ask 'why?' For example:

#### **Implementation method**

- Applying a Design and Development Overlay to Station Street.

#### **Why?**

- To limit the height of new development in Station Street to four storeys.

#### **Why?**

- To preserve the views from Lovers Leap to Gumnut Lake.

### 9.6.3 Make requirements clear

Mandatory requirements in schemes should use 'must' or 'must not'. For example:

- ✓ Buildings must be set back 3 metres from the front of the property.
- ✓ Building height must not exceed 21 metres.

'May' is used to confer a discretion for action by the responsible authority or other person. In the following example a permit may be issued but there is no obligation that it **has** to be issued:

- ✓ A permit may be granted to vary any dimension or requirement of this clause.

The use of 'must' is not always necessary to communicate clearly, but it has a directness that other forms of expression lack. For example:

- ✓ Motor vehicles must not be serviced or repaired for gain.
- ✗ No motor vehicle may be serviced or repaired for gain.

'Must' is preferred wherever possible for mandatory requirements for consistency and clarity.

'Should' cannot be used for mandatory requirements in planning schemes. It is used in criteria and in expressing non-mandatory requirements in schedules to some overlays, for example the Design and Development Overlay (DDO). 'Shall' is archaic and should be replaced by 'must'.

'Encourage' and 'discourage' are useful in objectives but should not be used in requirements:

- ✘ A maximum fence height of 1.2 metres will be encouraged for the street frontage.
- ✓ Fences at the frontage of a lot should not exceed 1.2 metres.

#### 9.6.4 Make discretion (or lack of discretion) obvious

Make mandatory requirements explicit. Do not assume that an applicant or VCAT will understand what you mean:

- ✓ The following requirements should be met. A permit may be granted to vary these requirements if the responsible authority considers that the proposal will better meet the objectives of the overlay.
  - Building height should not exceed 21 metres.
  - Filling should not be undertaken.
- ✓ The following requirements must be met.
  - Building height must not exceed 21 metres.
  - Filling is not permitted.

#### 9.6.5 Don't create confusion with 'and' and 'or'

The use of 'and' and 'or' can be problematic in the interpretation of lists. In this example an 'and' or 'or' is needed:

- ✘ A permit is not required for an outbuilding if:
  - the building area is less than 50 square metres
  - the building is set back more than 25 metres from any boundary.

These problems can be avoided by rewriting the provisions so that it is clear what is intended. For example:

- ✓ A permit is not required for an outbuilding provided the building area is either less than 50 square metres or it is set back more than 25 metres from any boundary.
- ✓ A permit is not required for an outbuilding provided the building area is less than 50 square metres and it is set back more than 25 metres from any boundary.

In bulleted lists neither 'and' nor 'or' should be used. The introduction to the list must make it clear whether all the requirements specified need to be met or just one of them.

### 9.6.6 Take care with definitions

Use words that have been defined in the planning scheme in strict accordance with their definition.

The following DDO requirement has a number of problems:

- ✘ The maximum building height in this precinct should not exceed 21 metres (6 storeys), including all roof structures, services, lift overruns and excluding architectural features only.

As a further issue the VPP defines 'building height' as 'the vertical distance between the ground level and the finished roof height directly above'. The DDO requirement relates imperfectly to this definition. It is also unclear whether a building less than 21 metres but with seven storeys is acceptable.

This requirement could be improved. For example:

- ✓ Building height should not exceed 21 metres or six storeys (not including basements). No structures except architectural features may be constructed above the finished roof.

Before you include a new definition ask yourself: 'why is a definition needed?' The VPPs provide a number of definitions and schemes should be drafted on the basis of these definitions.

A definition should not introduce controls. For example:

- ✘ Live work development means a dwelling adapted for use as a home-based office provided the office component is less than 40 square metres and is not publicly accessible out of normal business hours.

The requirements over the size and hours of operation have no place in a definition.

- ✓ Live work development means a dwelling adapted for use as a home-based office.

## 9.7 A guide to grammatical terms

The following includes many of the grammatical terms mentioned in this chapter.

Term	Meaning
Phrase	A group of related words.
Clause	A group of related words with a subject and a verb. Clauses that can stand alone as sentences are <b>independent clauses</b> . Clauses that can't stand alone are <b>dependent clauses</b> .
Sentence	A group of clauses or phrases related to one idea that must contain at least one independent clause.
Paragraph	A group of sentences related by a common idea or theme.
Noun	A class of words primarily naming objects or entities, either singular or plural, having the functions of subjects, objects and complements in sentences.
Verb	A class of words primarily designating actions or states, showing variation for tense, person and number.
Conjunction	A word that joins words, phrases or clauses <ul style="list-style-type: none"><li>■ The planner <b>and</b> the carpenter.</li><li>■ It was a long plan <b>but</b> a good plan.</li></ul>
Object	A function of nouns, usually the receiver of the action in active sentences.
Subject	A function of nouns, usually the doer of the action of the verb in active sentences. <ul style="list-style-type: none"><li>■ The planner (subject) performed a valuable role.</li><li>■ The planner returned the plans (object) in good condition.</li></ul>