Garvey A

This is my response to the consultation on the Draft Programme for Government (PfG) 2011-2015.

I am concerned that the Draft PfG lacks an overall vision and is light on key commitments for the natural environment. I believe that the Assembly needs to show the spirit and vision that is needed to make Northern Ireland a leader in sustainability and an example of what local democracy can achieve.

There is an intense focus in the PfG upon growing the economy but this should not be at the expense of the natural environment. Indeed, a healthy environment directly contributes towards a healthy economy – sustainable tourism and creation of the jobs needed to deliver a low carbon economy, are just two examples.

Whilst there are some good things in the Draft PfG, such as a revised Biodiversity Strategy and an Invasive Species Strategy, the document fails to put in place measures to help deliver them. In addition, there a number of significant gaps in the document that must be filled. I ask that the following targets are included in the PfG:

- A Northern Ireland Climate Change Act, with tangible emissions reduction targets for each sector. Currently we are 99% reliant on increasingly expensive imported energy. If we move to a low-carbon economy with a thriving renewable energy sector our energy supply will be secure, and we will have created thousands of new jobs and attracted major investment. Committing to a Climate Change Act would help us deliver this low-carbon economy.

- The creation of an independent environmental protection agency. This would act as a champion for sustainability and environmental protection, and prevent costly indecision and slow action on safeguarding our environment which leaves Northern Ireland taxpayers repeatedly exposed to the risk of enormous fines for breach of EU environmental law.

- A Northern Ireland Marine Act which ensures a framework for healthy seas and protection for a range of marine species.

- A reformed planning system with sustainability at its heart. I want to see a planning system that can help deliver a thriving economy whilst protecting our natural, built and cultural heritage. All development must be truly sustainable and promote long-term societal benefits, and deliver improved health and wellbeing.

- Increased funding for rural development to allow all farmers to be brought into agri-environment schemes. These are one of the main ways of halting biodiversity decline and they also provide a range of other benefits including helping support rural communities by providing financial support to farmers and creating significant socio-economic benefits.

Finally, I want the Assembly to 'Step Up for Nature' by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely

A Garvey

Gilmartin R

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Finally, I want the Assembly to 'Step Up for Nature' by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target. Yours sincerely

R Gilmartin

Gilmore A

To whom it may concern,

In response to the Draft Programme for Government 2011-2015 I wish to voice my concern at the lack of environmental targets.

Northern Ireland's beauty and wildlife are extremely important for our tourism and economy. Ignoring the importance of a healthy environment would be a very costly mistake. To that end, having an independent environmental agency is crucial to ensure swift action on safeguarding our environment.

There should be targets for Areas of Special Scientific Interest management and protection. Designation of these sites is not enough.

Targets should also be put in place in any Biodiversity Strategy to halt any loss and restore biodiversity within the next decade.

There is no commitment to a Northern Ireland Climate Change Act which would set firm emission targets for each sector.

There is also no mention of a Marine Bill for Northern Ireland. Our coastal waters are vital and this is a crucial piece of legislation to protect a huge range of marine species. We have some of the most important coastline and islands, to wildlife, in Europe. Lets protect it.

I would also like to urge the Executive to expand the funding for Agri-Environment Schemes. There should be a target to increase funding so that all farmers can be brought into these schemes. This will not only have significant gains for biodiversity, it also helps support rural communities.

I hope you will take the time to consider these points and include the changes.

Yours sincerely

A Gilmore

Glendinning R

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I am concerned that the Draft PfG lacks an overall vision and is light on key commitments for the natural environment. I believe that the Assembly needs to show the spirit and vision that is needed to make Northern Ireland a leader in sustainability and an example of what local democracy can achieve.

There is an intense focus in the PfG upon growing the economy but this should not be at the expense of the natural environment. Indeed, a healthy environment directly contributes towards a healthy economy – sustainable tourism and creation of the jobs needed to deliver a low carbon economy, are just two examples.

Whilst there are some good things in the Draft PfG, such as a revised Biodiversity Strategy and an Invasive Species Strategy, the document fails to put in place measures to help deliver them. In addition, there a number of significant gaps in the document that must be filled. I ask that the following targets are included in the PfG:

- A Northern Ireland Climate Change Act, with tangible emissions reduction targets for each sector. Currently we are 99% reliant on increasingly expensive imported energy. If we move to a low-carbon economy with a thriving renewable energy sector our energy supply will be secure, and we will have created thousands of new jobs and attracted major investment. Committing to a Climate Change Act would help us deliver this low-carbon economy.

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- Increased funding for rural development to allow all farmers to be brought into agri-environment schemes. These are one of the main ways of halting biodiversity decline and they also provide a range of other benefits including helping support rural communities by providing financial support to farmers and creating significant socio-economic benefits.

Finally, I want the Assembly to 'Step Up for Nature' by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely

Graham C

I am writing in response to the Draft Programme for Government and the concerns that I have regarding it.

I am concerned at the:

Lack of environmental targets and that we cannot afford to ignore the importance of a healthy environment for people and wildlife, which can help create a vibrant and sustainable economy, by focusing on a low carbon economy, promoting sustainable environmental tourism etc.

Lack of any commitment to a Ni Climate Change Act by the Executive, which would set a tangible emissions reduction target for each sector.

Lack of any mention of a Marine Bill for NI a crucial piece of legislation already in place in the rest of the UK and which would ensure a framework for healthy seas and protection for a range of marine species.

I would urge the Executive to expand the funding for Agri-Environment schemes. These deliver significant gains for biodiversity and help support rural communities by providing financial support to farmers. I believe a target should be set as the last target was missed by DARD to increase he funding for rural development and to provide enough funding to allow all farmers to be brought into the agri-environment schemes

Yours Faithfully

C Graham

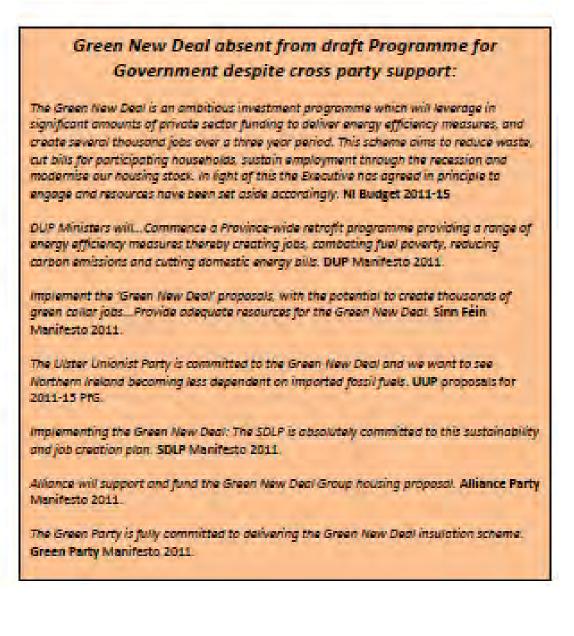
Green New Deal

The Green New Deal is a cross sectoral initiative led by: CBI, ICTU, Institute of Directors, NICVA, Ulster Farmers Union, Bryson Group, Energy Saving Trust, Friends of the Earth, NI Housing Executive

NORTHERN IRELAND GREEN NEW DEAL GROUP

Green New Deal Response to draft Programme for Government

21 February 2012



SUMMARY

Despite the allocation of £12m to the Green New Deal from April 2012 in Budget 2011-15, the Green New Deal is not mentioned in the draft Programme for Government.

Considerable uncertainty has surrounded the future of the Green New Deal since DSD and DETI Ministers indicated their intention in June 2011 to examine alternative uses of the £12 million allocated in the pudget.

The Green New Deal Group submitted a business proposal to Government in October 2011 (see annex.) at the request of DSD and this is currently being subjected to economic appraisal. The Department is judging it against other options for the use of the £12 million allocated, such as an energy advice service or an extension to the Warm Homes budget.

There is a danger that the nature of the appraisal process will weigh against the innovative features of Green New Deal finance and in favour of other strictly conventional approaches.

£12 million spent by Government on the Green New Deal will:

- Ensure a total investment of over £80 million in domestic energy retrofit.
- Save over 50,000 households an average of £350 on energy bills
- Alleviate and prevent fuel poverty in over 25,000 homes.
- Sustain up to 1100 jobs in the construction industry
- Cut carbon dioxide emissions by 2 tonnes per household per annum
- Return £440 million in lifetime savings to the Northern Ireland economy

This represents excellent value for money and would be a modest but significant step towards outting energy consumption and tacking fuel poverty – issues that the Programme for Government contains little in the way of concrete proposals to address.

The Green Deal has been launched for consultation in England, Scotland and Wales – the result of nearly 3 years work by DECC. Northern Ireland is in danger of being left far behind.

All parties in the Executive have supported the Green New Deal in manifestos or elsewhere. These commitments can now be translated into action through a policy decision by Ministers that the Green New Deal is their preferred way forward and by providing resources to enable the scheme to progress to the next stage.

ECONOMIC APPRAISAL

There is a danger that in comparing the relatively complex and innovative Green New Deal with other more traditional approaches using conventional economic appraisal methods, Government will be in danger of stifling precisely the kind of innovation that is needed to tackle the inter-related challenges of energy efficiency, fuel poverty, carbon emissions and job creation.

The development of the Green Deal in England, Wales and Scotland has involved a team of between 50 and 60 civil servants over nearly three years. In contrast the Green New Deal in Northern Ireland has been resourced by contributions from group members, a very modest sum from DSD and a great deal of pro bono work. Given the very limited resources available, it has not been feasible to produce a 'green book' business case; work remains to be done on securing funding from the Green Investment Bank and putting in place mechanisms for absorbing the risk associated with loan default by customers.

In particular discussions are ongoing with:

- UK Green Investments (the body running Green Investment Bank business pending State Aid approval) based on the Bank providing a subordinated loan to reduce the level of risk to commercial banks lending to the Green New Deal.
- a UK bank based on the bank making loans direct to Green New Deal customers and therefore taking on bad-debt risk and credit control itself.
- an energy NGO based on administering loans, collecting repayments and also carrying the risk of default by Green New Deal customers.

Accordingly the Green New Deal Group is asking Ministers to use the economic appraisal process to identify any outstanding issues in the proposal and to allocate resources to resolving those issues. Such resources were announced by the Minister for Finance and Personnel in March 2011.¹

ENERGY SUPPLIER OBLIGATION

DETI is currently exploring the potential of funding energy efficiency through a 'supplier obligation' – a requirement for energy suppliers to cut energy use in households through energy efficiency schemes. Such a scheme exists in GB and is being expanded as part of the Green Deal. In addition to the £200 million cost to Government, the scheme is funded through a 'levy' on the average household energy bill of approximately £70.

While such a supplier obligation may prove to be a helpful way forward for Northern Ireland in the longer term, placing such a burden on all households is likely to be controversial and will require legislation. It is also problematic in that for a supplier obligation to work in Northern Ireland, regulation of oil suppliers will be required. Thus any such scheme is likely to involve considerable negotiation and consultation and is unlikely to be ready for implementation for up to three years from now.

In the meantime a supplier obligation should not be a distraction from the urgent need to commence domestic energy retrofit at scale across Northern Ireland for which the Green New Deal is the only option on the table.

GREEN NEW DEAL MYTHS

Myth 1: The Green New Deal mutual company will be an unnecessary layer of bureaucracy. The Green New Deal achieves its impressive leverage of public to private investment through commercial loans. The scheme must be independent of Government in order to keep these loans off the public sector balance sheet.

Myth 2: The Green New Deal has high overheads.

Overheads attributed to the mutual company will be 1.5% of the total spend. The main overhead is that paid to providers who will deliver the scheme – no different from management fees currently paid to Warm Homes providers, for example. Government's £12m investment will be distributed in grant support to households.

Myth 3: The 'Green Deal' model in England, Scotland and Wales, based on an Energy Company Obligation, will be delivered at no cost to Government.

The UK Government has now allocated £200m in incentives to the Green Deal and costs will be passed through to household energy bills – about £70 a year.

THE GREEN NEW DEAL AND FUEL POVERTY

The Green New Deal will impact on fuel poverty and health in four ways:

- higher indoor temperatures and therefore better health and well-being;
- a smaller proportion of household income spent on energy;
- the switch from solid fuel to cleaner sources of heating can have significant health impacts on whole communities when it is done at an areas-based level;
- employment created will remove many households from fuel poverty by virtue of income gains.

The Green New Deal will not tackle all fuel poverty in the owner-occupied sector, however. Pay-asyou-save loans will often not be suitable for households in severe fuel poverty if a very high proportion of energy savings are taken in improved comfort.

The area-based approach: A unique feature of the Green New Deal is that it will take an area-based 'street by street' approach which will enable it to reach all fuel poor households and refer those that are eligible to Warm Homes and appropriate NISEP schemes.

This means, however, that different homes in the same street will be treated by a number of different providers: Warm Homes, Housing Executive, NISEP (several providers) and Green New Deal.

Effective and efficient delivery: The solution is to integrate all programmes under the umbrella of the Green New Deal and to deliver via a single provider in any one area. This integrated area-based method will enable a systematic approach to both fuel poverty and general energy efficiency with households benefiting from the efficiency and economies of scale achieved.

CONCLUSION

While the information currently available to the Executive is unlikely to be sufficient for them to confirm the commitment of £12 million from April 2012, a policy decision is now needed that the Green New Deal is their preferred way forward. This will enable the Minister for Finance and Personnel to release the funding he allocated to the Green New Deal for the current financial year and for negotiations to take place in earnest with financial institutions and district councils.

ANNEX: SUMMARY OF GREEN NEW DEAL PROPOSALS FOR HOUSING (OCTOBER 2011)

Business proposal: 52,500 homes will be retrofitted over three years from April 2012 with the assistance of £12 million in grant support alongside pay-as-you-save loans enabling a total investment in energy saving measures of over £80 million.

The offer to householders: The Green New Deal will offer a 'one-stop-shop' service for owneroccupied households comprising free energy assessment; installation of measures; grant assistance; loan finance; inspection and after sales service.

Pay-As-You-Save is central to the proposal. Instead of paying for energy investments in their homes up-front, householders will be able to use the savings they make on their energy bills to repay a loan over a number of years. Usually they will see an immediate saving on their annual energy bill as well.

A mutual company: Established as a mutual company for customer benefit, the role of the Green New Deal Trust will be to assemble the necessary finance and outsource its application and administration to experienced partner organisations.

District Councils: Northern Ireland's councils have a new power to promote energy efficiency in domestic housing (including the power to make grants and loans) under Section 23 of the Housing (Amendment) Act (Northern Ireland) 2011. District councils will be invited to propose neighbourhoods for Green New Deal projects and to form partnerships with Green New Deal 'Providers' selected through a procurement process.

Finance: The Green New Deal Trust will raise loans of £33 million to finance total lending to households of £45 million. Raising £33 million in unsecured borrowing is particularly challenging in the current economic climate. The Green New Deal Group and its financial advisors have constructed a package based on loans from commercial banks and the Green Investment Bank.

Scale: The Green New Deal proposals are at a much more modest scale than originally proposed and will be of little lasting value unless there is a Government commitment to progressively retrofit at least 500,000 homes. A rate of at least 60,000 homes a year is needed rather than 17,000 under the current proposals constrained as they are by the limited contribution from Government.

Benefits: Even at this modest scale, however, the benefits are not insignificant and include:

- An average household annual energy saving of 6,700 KWh worth over £350.
- £440 million in lifetime savings to the Northern Ireland economy.
- By year 3 between 750 and 1100 jobs will be sustained.
- An annual reduction in carbon emissions of 2 tonnes of CO₂e per household.
- A ratio of public expenditure to private investment of 1:7
- Alleviation and prevention of fuel poverty in at least 25,000 homes.

Green Party in Northern Ireland

PROGRAMME FOR GOVERNMENT – 2011-15 – CONSULTATION REPLY PROFORMA	
Name:	Gareth Brown
Organisation:	Green Party in Northern Ireland
Contact Details:	Room 259, Parliament Buildings, Stormont
Question 1 Do you agree that the Programme for Government is designed and balanced in	
a way that is appropriate in enabling the delivery of its priorities? If you do not agree, please	

explain why and what alternatives you would propose.

Question 1The Green Party does not share the view of the Executive that increased economic growth is a perquisite which ought to underpin the delivery of the Executives other high level priorities, incudingtackling poverty, disadvantage and inequality. We are concerned that the Executivelacks the will to take the tough the political decisions which are required to tackle these issues and, instead, continues to advance the false premise of economic growth as a solution. Indeed, in this mandate it is evident that the lack of economic growth has muted the Executive's ambition to establish more ambitious targets and tackle the social injustices in our society. The Green Party alsodoes not believe that the PFG sufficiently addresses the issue of sustainable development. Although in the 2006 'First Steps to Sustainability' strategy, the Executive acknowledged that the people of Northern Ireland live a 3 planet lifestyle, the understanding of sustainability as 'one planet living' appears to have been all but forgotten by the Executive. For instance, how does the Executive justify the sustainability of it's proposal to lower tax to encourage long haul air travel, given the impact of such travel on the environment? The Green Party believes that if the Executive is serious about sustainably growing the economy, policies ought to relocalise our consumption and production and develop our infrastructure in a manner which advances NI society closer to what can be defined as 'one planet living'. The Executive could advance this outcome, through much more ambitious energy reduction targets along with legislation on greenhouse gas emissions reduction targets, for example. Overall, the Green Party does not concur with the use of outputs as targets rather than outcomes and we believe that lack of outcome targets means that PFG therefore lacks any credible strategic vision. Problematically, the document presents a range of abstract investment figures together with proposals to develop a range of strategies. As neither is paired with discernable outcome targets, one cannot measure efficiency or effectiveness. The Government has therefore established its markers of success as the act of delivering services rather than how well these services are delivered and the impact that their delivery will have on the people. The Green Party is also concerned that there is no mention in the PFG of any government attempts at improving joined up working within government and reforming our public sector. We believe that it is crucial that the government tackles the inefficiency of our present governance and public administration arrangements and does much to ensure that resources are better consolidated and that government works together to deliver improved outcomes. There is no excuse for NI not to have world class public services equivalent to those delivered in Scandanavia, especially given that approximately the same percentage of the population in NI are employed in the public sector as in Sweden

These are some of the reasons why the Green Party remains unconvinced that the PFG is sufficiently well designed and balanced in order to meet the high level priorities.

Question 2

Do you agree that the Programme for Government sufficiently links the key commitments to plans for delivery?

If you do not agree, please explain why and what alternatives would you propose.

(No more than 500 words)

Question 2

The Green Party believes that in many respects the plans for delivery in the programme for government are lacking. For example, the PFG does not reveal any meaningful details of the measures that the Executive will take to achieve the aim of devolving corporation tax or the actions that will be taken to reduce greenhouse gas emissions over this period.

For most of the key commitments, which are already output commitments rather than outcome commitments, the plans for delivery are self-explanatory and space is wasted stating the obvious. For example, is it really necessary to provide an explaination of how the Executive will maintain regional rate increases at the rate of inflation?

The Green Party notes thatmore comprehensive, ambitious and measureable targets were provided in the last PFG.

The Green Party believes that the PFG should have been designed with outcomes in mind and the plans for delivering those outcomes should have been what strategies and legislation the Executive plans to put in place to achieve the goals

Question 3

Do you agree that, in general, the key commitments contained within the document are appropriate to the successful achievement of priorities? If you do not agree, please explain why and identify any potential gaps that may exist. *(No more than 500 words)*

Question 3 While the Green Party agrees with the 5 high level priorities in the PFG, we do not believe that the government's commitments will result in these outcomes.

Priority 1 - The Green Party believes that the Government's commitments will make our economy more unsustainable both from an environmental perspective but also from a purely economic perspective. This is because the Government is committed to engage in a 'race to the bottom' in terms of lowering the tax rates to compete with other countries in the attraction of FDI. While such policies are likely to deliver short term gains, we must recognise that once an economy is dependent on the presence of mobile FDI, tax rates must remain low and competitive by international standards in order to guarantee the continued presence of firms. Any future international competition with NI on tax rates or regulatory standards has the potential to impair the ability of the government to raise sufficient revenue to deliver public services. The Green Party would advocate policies which encourage the creation, promotion, and improved productivity of domestic businesses over and above a strategy dependent on FDI. The Green Party also has reservations about the Executive's target to ensure that 90% of large scale investment planning decisions are made within 6 months. We are conscious it can often takes more than 6 months to appropriately assess the environmental, social and economic impacts of large scale planning decisions. As such any attempt to speed up the planning process must not be at the expense of good planning which takes these issues into consideration. The Green Party is also conscious that the promise to promote 25,000 jobs in the PFG timeframe will not necessarily translate to a lower level of unemployment. Indeed, we are disappointed that a lower level of unemployment was not specified as an outcome.

Priority 2 - The Green Party does not believe that the government's commitments are likely to tackle disadvantage and improve the health and wellbeing of persons in society. Fundamentally, the Green Party recognizes that tackling disadvantage will require a reduction in the levels of inequality and we would like to highlight the evidence by Wilkinson & Pickett in 'The Spirit Level' which demonstrates why more equality is often better for everyone. The Green Party recognizes that economic growth alone often enhances inequality and, for this reason, tackling poverty requires government intervention. We would like to highlight that the PFG lacks substantial additional budgetary commitments in the compared to the last mandate which address the issue of poverty and we would question why, given the economic downturn and the additional demands that are likely to be placed on government, this issue has not been given added precedence. The Green Party are particularly disappointed that the Government has not yet made full financial commitment to supporting the Green New Deal. This initiative had the potential to not only cut the high levels of fuel poverty in NI but also create jobs and cut foreign energy consumption thereby maintaining spending within the domestic economy. In solving these issues, the Green Party believes that the Government ought to move towards a system of outcome based budgeting through which a wide range of outcomes are measured and budgeted for. We believe that taxation in NI could be made much more progressive and that the government ought to seriously consider ways to raise revenue from the wealthiest in society to support early intervention, preventative spending initiatives.

Priority 3 - The Green Party is similarly skeptical that the third high level priority can be achieved with the government's current commitments. We understand that the arbitrary figure of £500m investment in public transport disguises the fact that the ratio of government spending on roads and transport is below the government's own recommended 65:35 ratio and falls to as low as 87:13 in 2013-4. The Green Party is also conscious that the best way to achieve the aim of creating safer communities is to invest in early intervention preventative initiatives rather than strengthening the justice system. We are also conscious that the the government has set itself a target of maintaining high quality drinking water and we would question the extent to which this target is compatible with the extraction of unconventional shale gas using hydraulic fracturing. While we commend the Government on increasing the greenhouse gas emissions reduction target to 35% on 1990 levels by 2025, we recognize that this target is still the lowest in the UK. Additionally, we are disappointed that, given the need to progressively reduce greenhouse gas emissions, the Government has not set itself any milestones.

**Continued in section 7

Question 4 Do you agree the Programme for Government is appropriately balanced in terms of sub-regional recognition? If you do not agree, please explain why and provide supporting information. *(No more than 500 words)*

Question 4

No Comment.

Question 5

Do you agree that the Programme for Government is appropriately balanced in terms of its recognition of major sectoral issues?

If you do not agree, please explain why and highlight any major sectoral issues for

consideration. (No more than 500 words)

Question 5 The Green Party believes that the PFG is too focused on the monetary benefits and insufficiently focused on the economic costs and non monetary environmental and social costs & benefits. In the Green Party's opinion, it is essential that these costs and benefits form the basis of decision making. It is for this reason that we believe that there is an insufficient focus on the charity, voluntary, social enterprise and co-operative sectors of the economy. We also believe that there is an insufficient focus on support for carers, families and for parents. The Green Party feels that the PFG is largely a document of individual departmental output commitments rather than cross departmental outcomes and, therefore, lackscoherient political vision for NI.

Question 6

Do you agree that the Programme for Government presents its priorities and commitments in a way that is fair and inclusive to all? If you do not agree, please explain why.

Question 6 The Green Party believes that the commitments in the PFG will have a detrimental impact on the poorest and those most dependent on public services in NI. Given that the PFG fails to establishany commitments to promote the wellbeing of specific groups including, the aged, children, disabled and women, it is difficult for us to assess how inclusive the PFG actually is.

Question 7 Are there any other issues in the Programme for Government that you

wish to comment on? (No more than 500 words)

Question 7 **Continued from question 3

Priority 4 – The Green Party believes that cohesion, sharing and integration ought to be at the heart of the PFG, however we are not confident that the government's proposals have satisfactorily addressed many of these issues. The current division of this society continues to act as a drain on the government's finances and we would therefore urge the government to ensure that the final CSI strategy sets out clear aims and objectives and a delivery plan.

The Green Party is alsoaware that although the PFG claims government aim is to unlock the potential of culture, arts and leisure, surelythe recent government budget cuts to the arts sector is surely incompatible with the government's aim?

Priority 5 – The Green Party does not believe that the Executive's aim of delivering high quality public services will be met as a result of the key commitments identified in this section. We believe that the Executive ought to take much more decisive action to rebalance the public sector between back room administration and front line delivery of public services. As mentioned before we believe that the more ambition is required to improve theoutput of the public sector through an increase in joined up working and an increase in the provision of shared services.

The Green Party welcomes the Executive's commitment to agree to changes to post-2015 structures of government and we would urge the government to adopt weighted majority decision making in the Assembly, an end to communal designation and most importantly to legislate to require full transparency on political donations. We believe that such changes are vital to normalize democracy in NI and rebuild trust in the political system.

Although the Green Party believes that there is significant potential for efficiency saving through the sharing of staff and resources between local councils, we do not concur with the Executive's decision to establish an 11 council model as we believe that it will have a detrimental impact on local democracy.

The Green Party would also encourage the Executive to publish a legislative programme as party of the final PFG.

Gribben J

Dear Sir - I welcome the inclusion of the following target in the Draft Programme for Government - "by 2015 create the conditions to facilitate at least 36% of primary school pupils and 22% of secondary school pupils to walk or cycle to school as their main mode of transport."

This would be a good thing, in cutting back on energy used by cars, calming traffic and facilitating children to be more active and thus more healthy.

Can I ask that the Northern Ireland Executive allocates sufficient investment to enable this target to be reached?

J Gribbin

General Teaching Council for Northern Ireland

'DRAFT PROGRAMME FOR GOVERNMENT 2011-15 – BUILDING A BETTER FUTURE' –A RESPONSE FROM THE GENERAL TEACHING COUNCIL FOR NORTHERN IRELAND

1.0 Introduction

1.1 The Council welcomes this opportunity to respond to the Northern Ireland Executive's 'Draft Programme for Government 2011-15-Building a Better Future' (the draft programme). Given its statutory remit, the Council will concentrate on the implications of the draft programme for the education service and educational policy in N. Ireland. Furthermore, and notwithstanding a welcome for the Minister's statement of 12 January 2012, the Council will take this opportunity to address what it sees as the unacceptable uncertainty which has been allowed to develop in the funding of schools; a degree of uncertainty which has been to the detriment of effective school development planning and teacher deployment. Moreover, over recent years the high degree of uncertainty in the arrangements for the administration of the education system has also had a negative impact on the school system and political leaders must now endeavour to ensure greater policy, administrative and resource stability.

1.2 As stated above, the Council will restrict itself mainly to education proposals that are contained in the draft programme. However, it may, at times be necessary to contextualise the response within the overall economic and social policy parameters of the draft programme.

2.0 The Executive's Approach

2.1 The Executive has situated its draft programme within the broad principles of **Peace**, **Prosperity, Fairness & Well-Being**. As general guiding principles, the Council regards this is a laudable point of departure. In developing these principles the Executive has established five priorities, as follows:

- Growing a sustainable economy and investing in the future;
- Creating opportunities, tackling disadvantage and improving health and well-being;
- Protecting our people, the environment and creating safer communities;
- Building a strong and shared community; and
- Delivering high quality and efficient public services.

In the context of the above, the Executive states that it will direct all government departments to work together 'to produce policies, plans and strategies – the building blocks – that are consistent with the priorities identified' (Draft Programme for Government p27). Moreover, there is a commitment that government and partners in the private, community and voluntary sectors should develop a synergy of purpose to work collaboratively in pursuit of these priorities.

2.2 The Council welcomes these developments as an example of appropriate multi-level governance which ensures that the central government has the necessary flexibility to deal with the fundamental problems that the community faces. However, in order to ensure effective multi-level

governance the civil service needs to be more open, flexible and accountable if its engagement with civil society is to bring sustainable benefits at both individual and community level. It is clear to the Council that although governance arrangements may change and adapt, there appears to be a timelag within the state bureaucracy in responding to emerging problems that need urgent solutions. This is of particular interest to Council in relation to education policy and its implementation.

2.3 The Council recognises that each of the priorities identified can be referenced against a high quality education service within which teachers play a pre-eminent role. Indeed, the availability and access to high quality education must, of necessity, be a sine qua non for the achievement of the Executive's priorities. The draft programme refers to all government departments working together to put in place 'the building blocks' that are consistent with the identified priorities. The Council wishes to emphasise that the education system and its schools (and teachers) provide the foundation stone for these 'building blocks'. The Council therefore wishes to highlight the centrality of education policy and provision if the priorities identified are to become a reality.

3.0 Turning to the specifics

3.1 The five priorities referred to earlier are to be supported by a series of building blocks (either existing policies or new ones to be developed). Each priority is now considered in turn against the specific building blocks identified.

Priority 1: Growing a Sustainable Economy and Investing in the Future

Related building blocks to education policy:

The Skills Strategy

The Essential Skills Strategy

The Revised Curriculum and the Entitlement Framework

Every School and Good School – A Policy for School Improvement

Success through Science, Technology, Engineering, Mathematics

Related to the above priority, the Executive has identified a number of key commitments and milestone/outputs directly relating to education policy:

- Increase uptake in economically relevant science, technology, engineering and mathematics (STEM) places.
- Increase the proportion of young people from disadvantaged backgrounds who achieve 5 GCSEs at A star C or equivalent GCSEs in Maths and English.
- Upskill the working age population by delivering 200,000 qualifications.

RESPONSE: The Council gives a cautious welcome to the details outlined at priority one, however, sight must never be lost that a broad and balanced curriculum must remain the central entitlement for all children and young people. However, the Council is concerned that too great an emphasis is placed on GCSEs in terms of school accountability. The Department of Education urgently needs to ensure that alternative vocational courses are given appropriate weight when it comes to evaluating school effectiveness.

The Council welcomes the Minister's recent statement (12 January 2012) allocating much needed resources to schools from the 2012/13 financial year on. These newly allocated resources help in part alleviate the earlier budgetary retrenchment that was envisaged and which would have had very serious implications for schools. However, lessons need to be learned. Schools and teachers have, in recent years, had to put up with financial uncertainty which negatively impacts on internal planning processes especially in the area of school development planning. The Executive should now ensure that greater financial planning stability across the public sector is a priority.

Furthermore, the Council believes that the planned cuts to the Education Budget will still have serious implications for schools. Serious planning weaknesses exist in that policies are developed without a detailed economic assessment of their implications including appropriate risk assessment analysis, for example the Entitlement Framework was developed at a time of economic growth but may fail to reach its potential as a consequence of recession and retrenchment.

Priority 2: Creating Opportunities, Tackling Disadvantage and Improving Health and Well-being

Related building blocks to education policy:

- 10 year Strategy for Children and Young People
- The Skills Strategy
- Count, Read: Succeed A Strategy to Improve Outcomes in Literacy and Numeracy

Related to the above Priority the Executive has identified a number of key commitments:

- Ensure there are no increases in student fees beyond the rate of inflation for Northern Ireland students.
- Improve literacy and numeracy levels among all school leavers with additional resources targeted at areas of educational underachievement.
- Ensure that at least one year of pre-school education is available to every family that wants it.

RESPONSE: The Council welcomes this priority and the key commitments identified but it is mindful of the challenge it involves. Even during economically auspicious times educational disadvantage and underachievement is a steadfast and intractable problem. However, if this priority is to be realised the root causes of disadvantage must be identified and their impact of educational underachievement addressed. Therefore a renewed energy from the Executive is required to reinvigorate the 10 year Strategy for Children and Young People. The Council is concerned that the Executive and the civil service departments fail to carry through agreed policies with a sense of urgency. In this context, there is a growing expectation in the community that 'delivery' will be a priority of this programme for government.

The Council now wants to address the issue of pre-school education. In its response to the DE consultation on the 'Early Years(0-6) Strategy, the Council drew DE's attention to the importance of providing high quality pre-school education and identified research that emphasised the crucial role that professional and qualified teachers play in ensuring quality outcomes (see for example EPPE and EPPENI research findings). This quality provision is mainly to be found in the statutory sector and in nursery units attached to primary schools. In developing policy in the crucial area of pre-school provision, the Executive must not weaken statutory sector provision where high quality outcomes are achieved. Indeed, policy innovations are required to allow the voluntary and private sectors to draw on the expertise of the statutory sector. By way of example, principals of statutory schools could be resourced to adapt more strategic leadership roles in their local communities in the area of pre-school provision to maximise quality educational outcomes. The development and resourcing of high quality pre-school education, the Council suggests, is surely one of the most economically efficient means to redress educational disadvantage in later life.

Priority 3: Protecting Our People, the Environment and Creating Safer Communities

No specific education policy building blocks are benchmarked against this priority,

Priority 4: Building a Strong and Shared Community

Related building blocks to education policy:

• Community Relations, Equality and Diversity in Education Policy.

Related to this priority the Executive has identified the following commitments:

- Establish a Ministerial advisory group to explore and bring forward recommendations to the Minister of Education to advance shared education.
- Ensure all children have the opportunity to participate in shared education programmes by 2015 and substantially increase the number of schools sharing facilities by 2015.

Response: The Council welcomes this priority and the stated commitments. However, as always the 'devil will be in the detail' and the practical outworking of the commitments. It is also unclear what the current benchmark position is vis-à-vis shared education. In fact establishing a benchmark position must necessarily be one of the first tasks of the proposed advisory group. Moreover, it is unlikely that the success of the priority will be cost neutral and, at a time when the financial resources allocated to schools are under strain, the Executive's ambitions may not be realised. Of course, a commitment to a 'Shared Education' if properly managed may well lead to savings in terms of duplication of resources both human and physical but this is unlikely to be the case in the short to medium term when additional expenditure and investment will be necessary. The will be many practical issues to be resolved for example, leadership training, timetabling and co-ordinating school holiday arrangements to name but a few. In addition, the commitment to 'Shared Education' must be based on a consensus reached by agreement of the existing sectors. In order to achieve this, the proposed Ministerial Advisory Group must ensure agreement through a genuine participatory engagement of all the sectors and, crucially, by starting with recognition of the integrity and value of education they already provide.

Priority 5: Delivering High Quality and Efficient Public Services

- Schools for the future: A policy for sustainable schools
- (Establishment of) Education and Skills Authority

Related to this priority the Executive has identified the following commitments:

• (We will) make the Education and Skills Authority operational in 2013 (to be fully functional by 2014/15).

Response: The Council welcomes this priority and would begin by reminding the Executive it must lead by example in ensuring 'high quality and efficient public services.' In terms of educational administration, there must be no further 'political delay' in establishing the Education and Skills Authority and, if local political leaders are really serious about education, then the timeframe set out in the draft programme to establish the ESA needs to be brought forward. Indeed there is now a strong case for the ESA to be established in shadow form by April 2012. Moreover, at departmental level, the recent proposal to merge DE and DEL could, if carried through, lead to more coherent education policy with a renewed and clear focus on lifelong learning. The Council would support this development.

In terms of sustainable schools, while the Council supports the concept, this policy objective must not be achieved through the implementation of wholesale school closures and reduction in teaching posts. Moreover, there is a sense that financial strictures are now driving DE education. In this context, many of the existing policy initiatives were planned and launched at a time of growing public expenditure. The Council suggests that the time may well be right for an 'audit' to ensure that policy objectives are more closely aligned with the resources available. Furthermore, the most important 'resources' within the education system are teachers and other support personnel and, as a consequence, it is incumbent of the Executive and DE to ensure that front-line services are protected. Moreover, the Executive must be aware of the frustrations of those 'at the front line' when policy expectations are not met with adequate resources to deliver. A lack of leadership and direction has serious consequences for morale and those in positions of power must now redouble their efforts to provide leadership to the wider community.

In striving to achieve the sustainable schools outcome there now needs to be a strategic and proactive workforce planning drive at DE level. There is a range of issues that need to be addressed as a matter of urgency and only DE has the remit and the resources necessary to develop systematic plans in this area. Therefore the Council calls on the Executive and DE to engage with the following matters by way of short term, medium and long term goals and measurable policy outcomes. Moreover, the Council would be willing to support DE in this task in whatever way practicable.

- 1. The current imbalance in the supply and demand of teachers needs to be addressed. The Executive and DE/DEL should set an objective to get the supply/ demand of teachers into reasonable equilibrium by 2020 with substantial progress towards achieving this goal reported to the Assembly by 2015 and again by 2017. As a first step, the Executive (DE, DEL) should ensure that there are no contradictory policies currently in operation with regard to facilitating schools pupils who may wish to undertake initial teacher education programmes either locally, in Northern Ireland, or at higher education institutions in other United Kingdom jurisdictions. For example, this may involve the current advice provided by the Careers Advisory Service in relation to beginning teachers' employment prospects in Northern Ireland and other student support mechanisms (including financial). It is also essential that both DEL and DE when seeking to establish a supply/demand equilibrium for in Northern Ireland prioritise their support for local higher education institutions whose programmes have been accredited by the GTCNI.
- 2. Teaching is a very demanding professional activity and a career in teaching requires constant intellectual, physical and emotional renewal. Therefore, the proposed changes to the teachers' pension scheme including increasing the retirement age have been a cause of serious concern to the profession; however, the Minister is to be commended for his recent allocation of funding to employing authorities regarding teacher redundancy compensation. Notwithstanding this positive move the Executive should now instruct DE, as a matter of urgency, to carry out a comprehensive review of teachers' career cycle from induction to end-of-career exit processes with a view to ensuring the profession is continually renewed while, at the same time, maintaining a demographic profile that ensures an appropriate professional balance of early career teachers and experience within our schools. By way of practical examples, this should include, among other things, an induction programme that is fit-for-purpose, a centralised substitute cover programme and end-of- career 'work-out' schemes. This approach would ensure better long term planning which would be more congruent with the sustainable schools' policy.

4.0 Conclusion

4.1 Notwithstanding the concerns expressed above, the Council endorses the broad general themes in the draft programme. However, as stated earlier, the focus must now be on delivery based on achieving a broad consensus on the way forward. The Executive must provide a greater sense of leadership and adopt a renewed urgency in order to achieve the policy objectives in the draft programme. The Council in responding to previous Government consultations has emphasised that the dynamics of the global knowledge economy will have major implications for the future economic prosperity of Northern Ireland. Therefore education must be a policy priority for the Executive. Of course, the STEM priority is an important response to the demands and challenges of the knowledge economy, however, care must be taken not to lose sight of other crucial areas in education for example, creativity, flexibility, team working and cooperative working skills, and nurturing dispositions to lifelong learning.

In conclusion, if by 2015 the Executive can report measurable successes on the areas listed below and follow through on the points raised by the Council in this response, then it may reasonably claim to have achieved something worthwhile for the community, if not, the community at large will have been done a major disservice.

- Tackling underachievement and educational inequality,
- The Revised curriculum and Entitlement Framework,
- Every School a Good School,
- Shared Education,
- An emphasis on literacy and numeracy,
- The establishment of the ESA,
- Sustainable Schools,

For its part, the Council wishes the Executive well as it embarks on the 'delivery' of the draft programme, however, it must also realise that the community has invested enormous hope in the whole enterprise of devolved government and political leaders now need to move our society forward to a truly 'shared future' that guarantees, Peace, Prosperity, Fairness and Well-Being.

GUTH-Mid Ulster Gaelic Voice

Reachtaíocht idirnáisiúnta - Faoin Chabhailchoinbhinsiún um Chosaint na Mionlaigh Náisiúnta agus faoin Chairt Eorpach ar Theangacha Réigiúnda nó Mionlaigh, tá sé de dhualgas ag rialtas na Breataine chomh maith leis an Fheidhmeannas agus ag Tionól TÉ, an Ghaeilge a chosaint.

Acht na Gaeilge TÉ – 'Sé cúis buartha é nach bhfuil an tAcht luaite sa dréacht cháipéis, ainneoin an gealltanas ar tugadh i gComhaontú Cill Rímhinn, reachtaíocht don Ghaeilge a reachtú. Tá an chomhaontú seo anois cúig bliana d'aois. Ba chóir do Chlár an Rialtais an tacaíocht forleathan atá ann do reachtaíocht don Ghaeilge sa Tuaisceart a aithint.

An Straitéis don Ghaeilge – Cé go bhfáiltímid roimh an tagairt don straitéis, ní thugann an Chlár don Rialtas aon sonraí faoin tionchar a bhéas ag an Straitéis, nó cad iad na himpleachtaí a bhéas aige don Chlár. Is mór an trua seo, mar cé go dtuigeann muid nach bhfuil críoch tagtha leis an obair seo, tá sé soiléir go mbeidh impleachtaí ag straitéis éifeachtach ar cuid mhaith de Chlár an Rialtais agus b'fhearr linn na himpleachtaí seo a bheith níos so-fheicthe sa dréacht cáipéis.

Ag fás Geilleagar Inbhuanaithe agus Infheistíu don Todhchaí – Maidir le hathnuachan Geilleagar, tá comhlachtaí agus gnónna sa tuaisceart atá ag feidhmiú go dhátheangach, nó a bhaineann úsáid as an Ghaeilge ar bhonn laethúil ina gcuid gnó. Tá buntáistí eacnamaíoch agus forbartha leis an Ghaeilge, mar shampla sna meáin, i gcúrsaí aistriúcháin srl agus ba chóir do dhréacht Chlár an Rialtais tábhacht na Gaeilge a aithint, agus cuidiú a chur ar fáil do chomhlachtaí an taobh teanga dá gcuid gnó a fhorbairt.

Ag Tógáil Pobal Láidir Comh-roinnte – Bheadh tacaíocht láidir don Ghaeilge sa dhréacht Chlár ina chéim mhóir i dtreo aitheantas don Ghaeilge mar chuid de shaibhreas cultúrtha comh-roinnte.

Ag Soláthair Seirbhisí Poiblí Eifeachtach d'Ard-chaighdéan – Níl aon fáth nach mbeadh an Ghaeilge iniata ón tús in aon tionscnamh úr dírithe ar feabhsú Seirbhisí Poiblí, ag éascú réamhphleanáil agus ag seachaint cur amú ama agus costais breise. Tá Gaeilgeoirí ag gach leibhéal d'ár Seirbhísí Poiblí. Thiocfadh leis an Chlár don Rialtas na daoine seo a shainaithint ag an tús, agus an acmhainn láithreach seo a úsáid mar bhuntáiste.

Tús a chur leis An tÚdarás Oideachas agus Scileanna i 2013 – Ba chóir go mbeadh an Ghaeilge agus cur chun cinn mar cheann de na príomh-luachanna den Údarás Oideachas agus Scileanna nuair a bunaítear é i 2013.

Translation.....

International legislation – Under the Framework Convention for the Protection of National Minorities and the European charter for Regional and Minority Languages, it is the responsibility of the British government as well as the Executive and the NI Assembly to protect the Irish language.

The Irish Language Act NI - The fact that the ILA is not mentioned in the draft document is a cause of concern and The PfG should take into account the overwhelming support for Irish language legislation expressed by the Irish language community in the North.

The Irish Language Strategy - Welcome though the reference to the strategy is, the draft PfG gives no detail of how this strategy might impact or what its effect might be on the main themes of the PfG.

Growing a Sustainable Economy and Investing in the Future - In terms of Economic Renewal, many businesses in the north now operate bilingually, or indeed, actively promote the Irish language in their everyday business dealings. The proposed PfG could cater for these, and other businesses, to help them promote the language aspect of their business, particularly in Irish language media.

Building a Strong and Shared Community - A strong support of the Irish language within the draft PfG would be a great stepping stone towards an understanding and acceptance of a shared culture and language, rather than one which divides.

Delivering High Quality and Efficient Public Services - There is no reason why the Irish language could not be included from the start in any new initiatives aimed at improving Public Services, improving pre-planning and thus avoiding time wasting and extra costs at a later date. Irish speakers exist at every level of all our Public Services. The PfG could identify these individuals at the start, and use this already existing resource to its advantage.

Make the Education and Skills Authority operational in 2013 - The Education and Skills Authority, proposed to be operational by 2013, should have the Irish language and its promotion as one of its core values.

Guthrie M

This is my response to the consultation on the Draft Programme for Government (PfG) 2011-2015.

I am concerned that the Draft PfG lacks an overall vision and is light on key commitments for the natural environment. I believe that the Assembly needs to show the spirit and vision that is needed to make Northern Ireland a leader in sustainability and an example of what local democracy can achieve.

There is an intense focus in the PfG upon growing the economy but this should not be at the expense of the natural environment. Indeed, a healthy environment directly contributes towards a healthy economy – sustainable tourism and creation of the jobs needed to deliver a low carbon economy, are just two examples.

Whilst there are some good things in the Draft PfG, such as a revised Biodiversity Strategy and an Invasive Species Strategy, the document fails to put in place measures to help deliver them. In addition, there a number of significant gaps in the document that must be filled. I ask that the following targets are included in the PfG:

- A Northern Ireland Climate Change Act, with tangible emissions reduction targets for each sector. Currently we are 99% reliant on increasingly expensive imported energy. If we move to a low-carbon economy with a thriving renewable energy sector our energy supply will be secure, and we will have created thousands of new jobs and attracted major investment. Committing to a Climate Change Act would help us deliver this low-carbon economy.

- The creation of an independent environmental protection agency. This would act as a champion for sustainability and environmental protection, and prevent costly indecision and slow action on safeguarding our environment which leaves Northern Ireland taxpayers repeatedly exposed to the risk of enormous fines for breach of EU environmental law.

- A Northern Ireland Marine Act which ensures a framework for healthy seas and protection for a range of marine species.

- A reformed planning system with sustainability at its heart. I want to see a planning system that can help deliver a thriving economy whilst protecting our natural, built and cultural heritage. All development must be truly sustainable and promote long-term societal benefits, and deliver improved health and wellbeing.

- Increased funding for rural development to allow all farmers to be brought into agri-environment schemes. These are one of the main ways of halting biodiversity decline and they also provide a range of other benefits including helping support rural communities by providing financial support to farmers and creating significant socio-economic benefits.

Finally, I want the Assembly to 'Step Up for Nature' by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely

M GUTHRIE