



**Community Gardens Ireland
Submission on Planning
and Development Bill
2022**



24th February 2023



Submission on Planning and Development Bill 2022

Community Gardens Ireland

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Community Gardens Ireland

Community Gardens Ireland is a network of community gardens and allotments on the island of Ireland. In existence since 2011, it aims to support and promote community gardening in Ireland and Northern Ireland. Community Gardens Ireland is a purely voluntary group, whose committee has membership from all over the island of Ireland.

Community Gardens Ireland contribute positively to consultations regularly at a national level. Our submissions and presentations in 2021 and 2022 include the following:

- Presentations to the Joint Oireachtas Committees on Housing, Local Government & Heritage and Social Protection, Community & Rural Development & and the Islands
- Food Waste Consultation
- Sustainable Development Goals Implementation Plan
- Climate Action Plan, 2021 & 2023(Ireland)
- Citizens' Assembly on Biodiversity Loss & Ireland's 4th Biodiversity Action Plan
- Climate Change Bill, 2021 consultation (Northern Ireland)
- Community Foundation Fund, in partnership with Social Farms and Gardens Northern Ireland (grant application)
- Public Consultation on the environmental assessment of the Draft CAP Strategic Plan 2023-2027

Our committee for 2022/23 includes the following volunteers:

- Maeve Foreman – Mud Island Community Garden NEIC Dublin 3
- Claire Lyons – Cherry Orchard Community Garden, Dublin 10
- Dónal McCormack – Blessington Allotments, Wicklow (current chairperson)
- Conor O’Kane – Social Farms & Gardens Northern Ireland (current secretary)
- Órlaigh Sally – Co. Tyrone & Community Gardener (current treasurer)
- Miren Samper – Blarney Park Community Garden, Dublin 12
- Justyna Traore – Top of the City Community Garden, Waterford
- Ellie Donovan – L'Arche Cork Community Garden, Cork





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1. Executive Summary

Community Gardens Ireland is a network of community gardens and allotments on the island of Ireland. In existence since 2011 it aims to support and promote community gardens in Ireland and Northern Ireland.

Internationally, the evidence-based benefits of community gardens are many, from the proven physical, mental health and well-being benefits to educational, environmental, biodiversity and cultural gains. There is also evidence that they hugely increase social capital by encouraging active citizenship and social connection, help reduce health inequalities, and contribute to reducing anti-social behaviour, thus making communities safer.

Despite the proven benefits, existing legislation and commitment in the form of the current Programme for Government, there is no country-wide policy in place to increase the number of allotments and community gardens. The existing legislation also provides little protection for communities or duties on local authorities.

In urban areas the amount of land available for allotments and community gardens will become increasingly scarce. Community Gardens Ireland's survey of its members in 2021 highlighted that the majority of community gardens surveyed had temporary licences which can have large implications for funding purposes, some were on temporary sites zoned for housing and many struggled to obtain funding for garden infrastructure.

Compared to other countries, Ireland lags behind in the provision, support and protection of allotments & community gardens. Ireland currently provides one of the fewest number of allotments & community gardens in the EU.

Internationally there is strong support for urban agriculture initiatives such as community gardens or allotments to help biodiversity and as a positive climate change action. The Intergovernmental Panel on Climate Change has referenced that *"urban and peri-urban agriculture can contribute to improving urban food security, reducing GHG emissions, and adapting to climate change impacts."*

This submission therefore calls on the Joint Oireachtas Committee of Housing, Local Government & Heritage to increase the number of allotments and community gardens throughout Ireland through the following changes to the Planning and Development Bill 2022:

- Change definition of "allotment" in current legislation to "community growing space" to include allotments and community gardens
- Requirement to include reserving of land for community food growing in development plans
- Approval for disposal of community growing spaces by local authorities
- Add Ministerial role to make regulations
- Develop Local Food Growing Strategies



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2. Government Support for Allotments, Community Gardens, Urban Orchards and Community Food Initiatives

The 2020 Programme for Government called out support for the following:



- Work with local authorities and local communities to develop community gardens, allotments, and urban orchards.

In addition, the most recent COVID-19 Resilience & Recovery 2021 plan for The Path Ahead calls out support for community food projects as follows:

COVID-19 Resilience & Recovery 2021 The Path Ahead

- A programme of "citizen empowerment" wellbeing activities and initiatives will be delivered by Local Authorities with local partners, including activities supporting healthy living, physical activity, community food, creativity, managing chronic diseases and positive ageing.

3. Allotments & Community Gardens in Ireland & Europe

3.1 Ireland

In January 2020, the Local Government Management Agency released a report on “A PROFILE OF LOCAL GOVERNMENT CLIMATE ACTIONS IN IRELAND”. This report contained details of the number of local authority allotments and community gardens in Ireland, as shown:

64 of 148

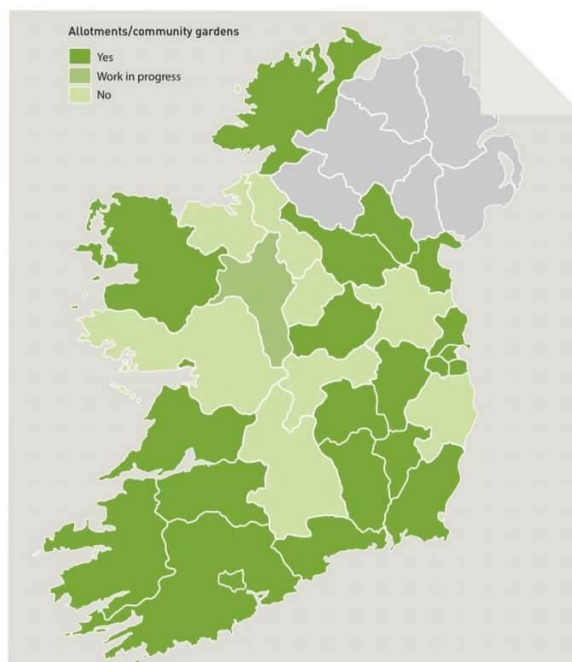


Figure 3.14: Local authorities providing allotments or community gardens.

Ref: <https://www.lgma.ie/en/publications/local-authority-sector-reports/a-profile-of-local-government-climate-actions-in-ireland-final.pdf>

As the above image shows, eight local authorities in Ireland do not provide any allotments or community gardens. According to the LGMA’s report, there are almost 2500 plots provided by local authorities (2400 allotments and 97 community gardens).

Community Gardens Ireland in our “Let’s Get Growing” report published in March 2022 called for a number of recommendations to improve allotments and community gardens, including a target of doubling of community growing spaces by 2025, a minimum level of demand for local authorities to provide community growing space, the introduction of waiting lists for local authorities, and improved legislation to provide protection and security of tenure to communities.

Ref: <http://cgireland.org/wp-content/uploads/2022/02/Community-Gardens-Ireland-Lets-Get-Growing.pdf>



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3.2 Other Countries

The Fédération Internationale des Jardins Familiaux is a European non-profit union of national allotment and leisure garden federations with more than 2,000,000 affiliated leisure gardeners and leisure garden families. The Fédération Internationale was founded in Luxembourg on 3rd October 1926.

According to the Fédération, other European countries offer far more community growing space compared to Ireland. Germany, for example, offers up to 1.3 million plots. Poland offers approximately 1 million plots. Denmark, with a similar population to Ireland, offers over 40,000 plots.

In addition, numerous other countries have community-friendly legislation which provides benefits for communities who seek land for allotments or community gardens. In Germany, for example, their allotment garden legislation includes specific limitations for rent prices not exceeding four times the rent customarily paid in the area by commercial fruit and vegetable growers. In Denmark in 2001 due to concern over the removal of allotment gardens, all allotment gardens became permanent from November 2001 following the passing of legislation in their parliament.

Questions	Austria	Belgium	Denmark	Finland	France	Germany	Great Britain	Luxembourg	Netherlands	Poland	Slovakia	Sweden
Number of gardens per country	37473	5301	40000	4400	25000	1300000	400000	4826	27500	1000000	88000	25000
Limitation for rent price		No				Yes	Yes		No	Free		
Protection against resiliation of the lease	Yes	No			Yes	Yes	Yes	Partially	General legislation	Yes		
Allotment Garden Law	Yes	No	Yes	No	Yes	Yes	Yes	Yes	No	Yes	Yes	No

List of EU and UK details obtained from the Fédération Internationale des Jardins Familiaux report from 2016. Ref: http://www.jardins-familiaux.org/pdf/E_INFO_2016.pdf

As highlighted earlier, the latest figures are that 2500 allotments & community gardens are provided by local authorities in Ireland. There is currently no specific community growing law, no limitation for rent prices, and no protection for any gardens in law in Ireland.

With no clear policies, poor legislation and a low number of local authority provided community growing spaces, Ireland has quite a way to go to match our neighbouring countries.



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4. Climate Change & Biodiversity Actions

4.1 Reductions in carbon & GHG emissions from community gardening

In the past, organisations such as the Scottish Allotments and Gardens Society have estimated the potential reduction in CO₂ emissions from community growing spaces. According to their document “Briefing paper on Allotments, Food and Climate Change: how growing one's own food can reduce emissions from food production”:

“If we assume that 25% of a plot-holders food is grown on their plots and there is a commensurate reduction in all bought food (but not in the domestic processing) then 4% (0.5 tonnes) of an individual’s total emissions will be saved each year. Surveys show that crops are usually shared by families, friends and local community groups. If we use a conservative estimate of two people benefiting, then at least 1 tonne of CO₂ is saved by each standard allotment plot every year and a one hectare allotment site saves 50 tonnes of CO₂ per annum.”

The Scottish Government also highlighted the reduction in carbon emissions from community growing, with estimates of between 2kg and 5kg of carbon equivalent for every kilogram of vegetable produced:

“Carbon emissions (including reducing energy use, more sustainable transport and less waste) can be reduced by between 2kg and 5kg of carbon equivalent for every kilogram of vegetable produced”

Ref: <https://www.gov.scot/binaries/content/documents/govscot/publications/consultation-paper/2018/06/allotments-further-guidance-local-authorities-part-9-community-empowerment-scotland/documents/00537266-pdf/00537266-pdf/govscot%3Adocument/00537266.pdf>

4.2 Intergovernmental Panel on Climate Change (IPCC) Report, 2019

A large argument in favour for the provision of more community growing spaces is that the spaces assist in the reducing of greenhouse gas emissions, improving urban food security, improving biodiversity and adapting to climate change impacts. In 2019, the IPCC released a report which included Urban Agriculture initiatives, as follows:

“Urban and peri-urban agriculture reduces the food carbon footprint by avoiding long distance food transport. These types of agriculture also limit GHG emissions by recycling organic waste and wastewater that would otherwise release methane from landfills and dumping sites (Lwasa et al. 2014). Urban and peri-urban agriculture also contribute in adapting to climate change, including extreme events, by reducing the urban heat island effect, increasing water infiltration and slowing down run-offs to prevent flooding, etc.

(Lwasa et al. 2014, 2015; Kumar et al. 2017a1209). For example, a scenario analysis shows that urban gardens reduce the surface temperature up to 10°C in comparison to the temperature without



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vegetation (Tsilini et al. 20151210). Urban agriculture can also improve biodiversity and strengthen associated ecosystem services (Lin et al. 20151211).”

“In summary, urban and peri-urban agriculture can contribute to improving urban food security, reducing GHG emissions, and adapting to climate change impacts (robust evidence, medium agreement).”

Ref: <https://www.ipcc.ch/srccl/chapter/chapter-5/>

4.3 Intergovernmental Panel on Climate Change (IPCC) Report – Working Group III, March 2022

Following the 2019 report above, the IPCC released their Working Group III report in March 2022. Detailed within this were climate and biodiversity actions related to increasing the amount of urban agriculture in urban areas, as detailed below:

D.2.1 Sustainable urban planning and infrastructure design including green roofs and facades, networks of parks and open spaces, management of urban forests and wetlands, urban agriculture, and water-sensitive design can deliver both mitigation and adaptation benefits in settlements (medium confidence). These options can also reduce flood risks, pressure on urban sewer systems, urban heat island effects, and can deliver health benefits from reduced air pollution (high confidence).

8.1 Sustainable Development: Urban agriculture, including urban orchards, roof-top gardens, and vertical farming contribute to enhancing food security and fostering healthier diets.

8.2.2 Economic development, competitiveness, and equity: Urban agriculture can not only reduce household food expenditure, but also provide additional sources of revenue for the city.

8.4.6 Urban-rural linkages: Urban food systems, as well as city-regional production and distribution of food, factors into supply chains. Reducing food demand from urban hinterlands can have a positive impact on energy and water demand for food production (Eigenbrod and Gruda 2015) (see ‘food system’ in Glossary). Managing food waste in urban areas through recycling or reduction of food waste at source of consumption would require behavioural change (Gu et al., 2019). Urban governments could also support shifts towards more climate-friendly diets, including through procurement policies. These strategies have created economic opportunities or have enhanced food security while reducing the emissions that are associated with waste and the transportation of food. Strategies for managing food demand in urban areas would depend on the integration of food systems in urban planning.

Link: https://report.ipcc.ch/ar6wg3/pdf/IPCC_AR6_WGIII_FinalDraft_FullReport.pdf



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4.4 Sustainable Development Goals

Community growing spaces also clearly help contribute towards some of the UN's Sustainable Development Goals, for example:



4.5 World Health Organisation recommendations for public green spaces

The World Health Organisation included reference to allotments & community gardens in their publication "Urban green spaces: a brief for action". In addition, they recommend the following:

"As a rule of thumb, urban residents should be able to access public green spaces of at least 0.5–1 hectare within 300 metres' linear distance (around 5 minutes' walk) of their homes."

https://www.euro.who.int/_data/assets/pdf_file/0010/342289/Urban-Green-Spaces_EN_WHO_web3.pdf

4.6 Soil Biodiversity

Current research from the GRFFN (Growing Real Food For Nutrition) project and soil scientist, permaculturist and author Matt Powers appears to show that the biodiversity of soil life tends to be higher in community gardens and allotments than it does in larger scale agricultural enterprises, even in organic and biodynamic farms.

Some of this may be down to the lower impact methods in use on many of these (i.e. no heavy machinery for soil compaction, rotovating not generally undertaken beyond initial ground clearing, no dig / minimal dig methods and mulch applications in use etc.) and also to the higher percentage of perennial and overwintering plants.

With the higher number of actively engaged gardeners per acre, all with their particular favourites, no single commercial operation would be able to maintain such a diversity of plant life above ground, and consequently microbial, fungal and arthropod life below it.

As our understanding of the importance of soil life has grown exponentially these last number of years, so should these growing spaces be valued for their role as guardians of soil rhizosphere biodiversity, and as potential incubators for wider soil remediation practices to improve Ireland's soil heritage.



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5. Planning and Development (Amendment) Act, 2010

The current Planning and Development (Amendment) Act, 2010 contains the following sections:

'allotment' means an area of land comprising not more than 1,000 square metres let or available for letting to and cultivation by one or more than one person who is a member of the local community and lives adjacent or near to the allotment, for the purpose of the production of vegetables or fruit mainly for consumption by the person or a member of his or her family;

13. Reserving land for use and cultivation as allotments and regulating, promoting, facilitating or controlling the provision of land for that use.

In March 2022, Community Gardens Ireland attended the Joint Oireachtas Committee on Housing, Local Government and Heritage. The session was solely dedicated to the *Provision of Community Growing Spaces in Ireland*. We presented our findings from our "Let's Get Growing" document, referenced here: <http://cgireland.org/wp-content/uploads/2022/02/Community-Gardens-Ireland-Lets-Get-Growing.pdf>

As part of the debate, Community Gardens Ireland referenced that *"The law has not caught up with the provision of community gardens as these are not defined in current legislation, and there is no condition of affordability"* and *"In reality, there is no community growing law in Ireland. Community growing projects may believe they have protection by law but this is not the case."*

We called on the Joint Oireachtas Committee to reform community growing legislation to make it easier for communities to access land for allotments and community gardens.

Feedback from the discussion of the committee was that there was *"broad unanimity among the committee around particular themes and that we would like the Department to start doing some work on this in terms of legislation, policy and support"* in favour of the presentation and recommendations of Community Gardens Ireland.

https://www.oireachtas.ie/en/debates/debate/joint_committee_on_housing_local_government_and_heritage/2022-03-01/2/



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6. Recommendations for the Planning and Development Bill 2022

The Planning and Development Bill 2022 is undergoing pre-legislative scrutiny by the Joint Oireachtas Committee on Housing, Local Government & Heritage. The following are the recommendations for the Planning and Development Bill 2022 from Community Gardens Ireland:

6.1 Change definition in Planning and Development Bill from “allotment” to “community growing space”

Proposal to add as definition:

“Community growing space” means an area of land let or available for letting as allotments or community gardens and cultivation by one or more than one person who is a member of the local community and where possible lives adjacent or near to the community growing space, for the purpose of promoting biodiversity, the production of vegetables or fruit mainly for local consumption and for the organisation of community growing and food events;

Rationale for recommendation:

Currently this section is not in the Planning and Development Bill 2022 and this should be rectified immediately.

Community Gardens Ireland believes that expanding the definition from “allotment” to “community growing space” is important to officially define both allotments and community gardens in law. Currently only allotments are present in the 2010 act.

Community Gardens Ireland also recommends removing the maximum size of an allotment as this would be decided by local factors (maximum amount of land available). Although the 2010 act currently specifies “not more than 1,000 square metres”, no local authority allotments in Ireland come close to this – most are between 50 and 600 square metres. In addition, by including community gardens in the definition, some community gardens may be larger (e.g. old Victorian Walled Gardens now managed as community gardens).

Community Gardens Ireland also believes that highlighting the role of promoting biodiversity and organising community growing and food events would be crucial to the revised definition.



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6.2 Requirement to include reserving of land for community food growing in development plans

Proposal to add to section 41: Obligations to make and review development plan, sub-section (8):

(e) Reserve land for use and cultivation as community growing spaces and regulate, promote, facilitate, control, record demand and provide access to land within a timely and affordable manner for that use.

Rationale for recommendation:

Currently this section is not in the Planning and Development Bill 2022 and this should be rectified immediately.

Community Gardens Ireland recommends that local authorities should “record demand” as no current law currently specifies that local authorities must respond to demand locally. The repealed Acquisition of Land (allotments) Act, 1926 specified that:

“Whenever a local authority is of opinion, as a result of representations made to them or on their own motion, that there is a demand for allotments in their area... such local authority may resolve to provide land for such allotments under this Act, and may thereupon carry such resolution into execution under and in accordance with this Act.”

<https://www.irishstatutebook.ie/eli/1926/act/8/enacted/en/print.html#:~:text=AN%20ACT%20TO%20ENABLE%20LOCAL,%5B6th%20March%2C%201926.%5D>

As detailed in Community Gardens Ireland’s presentation in March 2022, the 1926 act was repealed in 1994. However, this repealed act has repeatedly been referenced since 1994 as if it is still in effect, with the following examples:

Source	Link
2009 Parliamentary Question	https://www.oireachtas.ie/en/debates/question/2009-03-03/358/?highlight%5B0%5D=allotments
2011 Parliamentary Question	https://www.oireachtas.ie/en/debates/question/2011-05-25/31/?highlight%5B0%5D=allotments&highlight%5B1%5D=1926&highlight%5B2%5D=allotments&highlight%5B3%5D=allotment
2013 Parliamentary Question	https://www.oireachtas.ie/en/debates/question/2013-06-19/66/?highlight%5B0%5D=allotments&highlight%5B1%5D=allotments&highlight%5B2%5D=allotments
Cork City Development Plan 2015-2021	https://www.corkcity.ie/en/media-folder/cork-city-development-plan/corkcitydevelopmentplan_volume_1.pdf
Dublin City Council	https://www.dublincity.ie/dublin-city-parks-strategy/4-resources-and-services/412-allotments-and-community-gardens
Fingal	https://www.fingal.ie/sites/default/files/2019-03/Fingal%20Allotments%20Strategy%202012%20WEB%20VERSION.pdf
Mayo	https://www.mayonews.ie/news/6497-westport-fg-launch



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Source	Link
Monaghan	https://monaghan.ie/wp-content/uploads/2018/02/MonaghanTC_Minutes_July2012.pdf
Westmeath	https://www.westmeathexaminer.ie/2009/07/21/time-is-ripe-for-allotments-in-mullingar/
Wexford	https://www.independent.ie/regionals/wexfordpeople/localnotes/plans-for-community-allotment-scheme-for-clonard-residents-27704832.html

Also, in September 2022, Fingal County Council completed a review their Allotments Policy which found:

“There are two pieces of legislation related to the provision of allotments – the Acquisition of Land (Allotment) Act 1926 and the Planning and Development Acts 2000-2021. In the former, legislative power was given to Local Authorities to provide land for allotments subject to a defined demand for them. In this earlier legislation, an allotment is defined as: “a piece of land containing not more than one quarter of a statute acre let or intended to be let for cultivation by an individual to produce vegetables mainly for consumption by himself and his family”

<https://www.fingal.ie/sites/default/files/2022-12/Fingal%20County%20Council%20Allotments%20Policy%20Review%20%28Sept-Oct%202022%29.pdf>

Due to the repeated mention of the 1926 act by local authorities, Community Gardens Ireland believes there is a strong rationale to include the “demand” for community growing spaces be provided by local authorities in the Planning and Development Bill 2022.

Community Gardens Ireland also recommends that “provide access to land within a timely and affordable manner” be included in the Planning and Development Bill 2022. Currently there is no time limit for community growing spaces to be provided by local authorities. In Scotland, for example, there is a duty on local authorities to provide allotments for those waiting on a waiting list within 5 years:

3.1 Section 112(1) imposes a duty on local authorities to take reasonable steps to do the following: (1) provide sufficient allotments to keep the waiting list referred to in section 111 at no more than half of the authority’s current number of allotments; and (2) ensure that a person entered on the waiting list does not remain on it for a continuous period of more than 5 years.

<https://www.gov.scot/publications/part-9-community-empowerment-scotland-act-2015-allotments-guidance-local-authorities/pages/6/>

Community Gardens Ireland believes that including the wording of “timely” and later providing a role in law for the Minister to issue regular regulations/guidance would be of benefit to community growers in Ireland. Community Gardens Ireland believes that a time limit of 5 years, similar to Scotland, should be included in regulations/guidance as a maximum.



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In addition, Community Gardens Ireland believes that regulations/guidance should include details on the minimum number of local residents for whom the local authority must provide or facilitate community growing spaces upon registering their request. Community Gardens Ireland believes that 15 is appropriate, similar to Scotland.

Community Gardens Ireland also believes that including a reference to “affordable” in the Planning and Development Bill would provide for the Minister to have a role in law to issue regular regulations/guidance on community growing spaces.

In addition, the Acquisition of Land (Allotments) (Amendment) Act, 1934 (which amended the 1926 Act) sought to make allotments affordable. This was repealed in 1994.

As referenced above, the 1926 Act (and 1934 Act which amended it) continues to be referenced by local authorities. Community Gardens Ireland therefore believes that provision of affordability should be incorporated in the revised Planning and Development Bill 2022, which would then be defined by Ministerial regulation or guidance.

6.3 Approval for disposal of community growing spaces by local authorities

Proposal to add to Section 357 Disposal of land by local authorities:

If a local authority wishes to change the use of, or dispose of, the whole or part of such an allotment or community garden site that it owns, before doing so the local authority must obtain the consent of the Minister.

If a local authority wishes to renounce its lease of the whole or part of an allotment or community garden site, before doing so the local authority must obtain the consent of the Minister.

The local authority must provide alternative community growing spaces to the agreement of the local community in advance of any change of use of space.

Rationale for recommendation:

In Scotland and Wales, the Government Minister responsible for the area of allotments/community growing must approve before land is reused for other purposes. This provides additional security for local communities, along with assurances that alternatives must be provided in advance of the removal of community growing spaces.

Community Gardens Ireland believes this is good practice from Scotland and Wales and should be added to the Planning and Development Bill 2022.



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6.4 Add Ministerial role to make regulations

Proposal to add to Section 361 Power to make Regulations:

361 (1) (k) the reserving of land for use and cultivation as community growing spaces and regulating, promoting, facilitating, controlling, recording demand and providing access to land within a timely and affordable manner for that use.

Rationale for recommendation:

As specified in Section 6.2, the ability for an Irish Government Minister to issue regulations regarding allotments and community gardens (e.g. maximum time for local authorities to provide land or cost of use) should be added to the Planning and Development Bill 2022.

6.5 Develop Local Food Growing Strategies

Proposal to add to Section 49 Obligation to prepare strategy relating to environmental and climate change:

The delivery of a food-growing strategy and the provision, facilitation of the provision, and preservation of community growing spaces to help meet the requirements of the food-growing strategy.

Rationale for recommendation:

Similar to what is currently in place in Scotland, Community Gardens Ireland believes there is a role to help with environmental & climate change commitments for local authorities to create a food-growing strategy locally that should be updated at regular intervals.

The local food growing strategy would record, map and review the number of community growing spaces present in each local area, along with the demand evident locally (e.g. waiting lists). Such a strategy may issue recommendations such as the purchase of land locally or provide other suggestions to be incorporated into the overall development plan.

In addition, the local food growing strategy would highlight local initiatives that should be encouraged and highlighted, for example community supported agriculture.

Currently some local authorities have created food and beverage strategies, however, these are largely based around industry and are not generally community based.



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7. Conclusion

Community Gardens Ireland believes that the current laws regarding community growing are insufficient to meet the needs of communities in Ireland.

The persistent referencing of repealed laws by local authorities shows the clear need for a strong community growing law to be put in place.

There are strong reasons to support more allotments and community gardens throughout Ireland, namely: mental & physical health benefits, as a local climate action, to assist with local biodiversity, for sustainability purposes, reduction in carbon emissions, flood prevention activities, community empowerment, improvement of social capital, reduction in anti-social behaviour, increase in green canopy of urban areas and so much more.

The IPCC has included urban agricultures initiatives in their recommendations, community growing spaces directly assist with the Sustainable Development Goals, and the European Commission has acknowledged the contribution of community gardens and allotments to the conservation of pollinators and wider biodiversity, as well as to quality of life, learning and social interaction.

Countries close to Ireland have recently updated their community growing legislation for the benefit of local communities, and Ireland needs to look at these successful models and add this best practice to our own legal system.

Community Gardens Ireland believes that there is an urgent public need for the legislation accessing public land to grow your own food to be improved, not removed.



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Appendix 1 Supporting documentation for biodiversity & climate benefits from allotments & community gardens

Source	Details	Link
Association for Public Service Excellence	Biodiversity and Allotments: Gardening in harmony with Nature	https://www.apse.org.uk/apse/index.cfm/news/articles/2020/biodiversity-and-allotments-gardening-in-harmony-with-nature/
IOPScience	Environmental Research Letter: Potential of urban green spaces for supporting horticultural production: a national scale analysis	https://iopscience.iop.org/article/10.1088/1748-9326/ac4730
Scottish Allotments and Gardens Society Scottish Natural Heritage	Allotments and Biodiversity Gardening in harmony with nature	https://www.glasgow.gov.uk/CHttpHandler.ashx?id=31684&p=0
Glasgow City Council		
South Dublin Allotments Association as part of its contribution to 2010 - United Nations International Year of Biodiversity	Biodiversity and Allotments	http://homepage.eircom.net/~sthduballots/Biod2010.pdf
French allotment federation (FNJFC)	Allotment gardens, a real biological diversity	http://www.jardins-familiaux.org/pdf/news/fr/FR210810_E_Frankreich44.pdf
The Highway Council	Growing Our Future - A Community Food Growing Strategy for Highland	https://www.highland.gov.uk/download/downloads/id/22921/growing_our_future_-_a_food_strategy_for_highland.pdf



Submission on Planning and Development Bill 2022

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Appendix 2 Country/EU Specific Supporting Documentation

Source	Details	Link
Scottish Government	Link to guidance documents & laws around community growing in Scotland	https://www.gov.scot/publications/part-9-community-empowerment-scotland-act-2015-allotments-guidance-local-authorities/pages/2/
Welsh Government	Link to guidance documents & laws around community growing in Wales	https://www.gov.wales/allotments-and-community-gardens
European Commission Parliamentary Question	Acknowledgement by European Commission of the role of community gardens and allotments in helping pollinators and wider biodiversity, as well as to quality of life, learning and social interaction	https://www.europarl.europa.eu/doceo/document/E-9-2019-003594-ASW_EN.html
European Commission Parliamentary Question	<p>Details from the European Commission on the role of urban agriculture as a part of Europe's food production landscape with potential for further growth and development.</p> <p>Also details about the EU Biodiversity Strategy for 2030, which the Commission called on European cities of at least 20 000 inhabitants to develop ambitious Urban Greening Plans by 2021.</p>	https://www.europarl.europa.eu/doceo/document/E-9-2022-001084-ASW_EN.html



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