



**Community Gardens Ireland
Submission to Climate
Action Plan 2023
(Expert Evidence)**



16th September 2022



Submission to Climate Action Plan 2023

Expert Evidence

Community Gardens Ireland

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Community Gardens Ireland

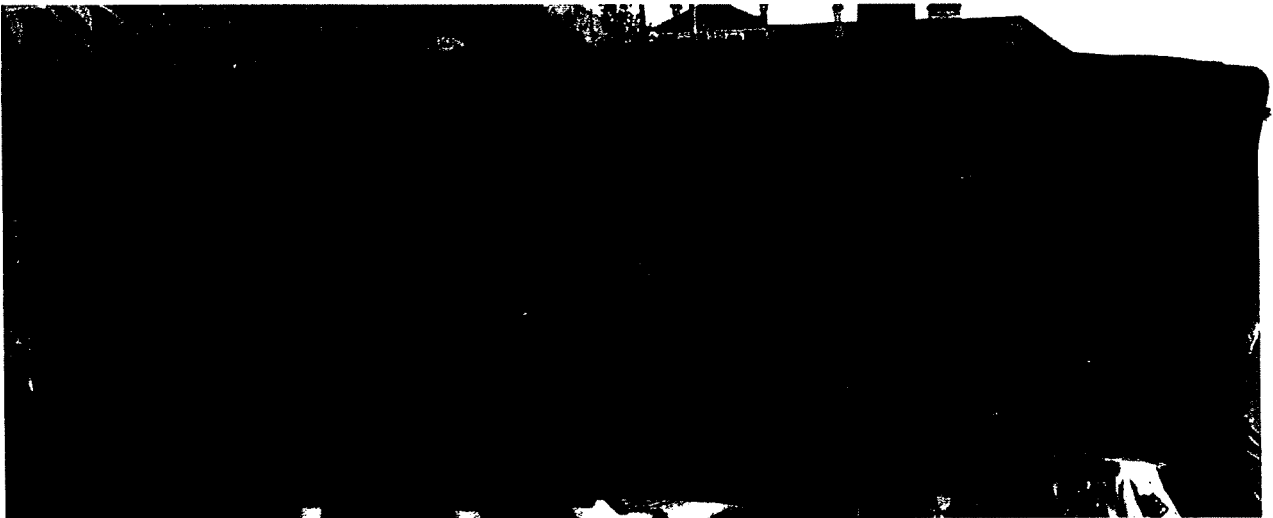
Community Gardens Ireland is a network of community gardens and allotments on the island of Ireland. In existence since 2011, it aims to support and promote community gardening in Ireland and Northern Ireland. Community Gardens Ireland is a purely voluntary group, whose committee has membership from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

- [REDACTED]
- [REDACTED]
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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."*

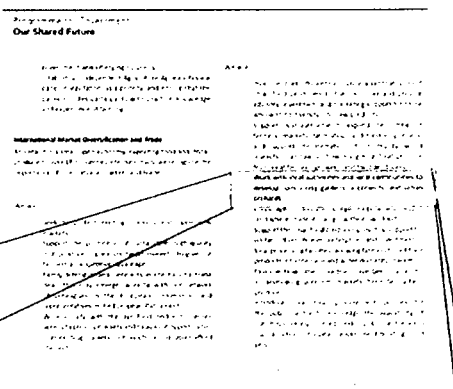
This submission therefore calls on the Climate Action Plan to include our recommendations to improve the number of allotments and community gardens throughout Ireland, through the following actions:

- Recognising Community Growing as a Climate & Biodiversity Friendly Action for Communities
- Supporting the doubling of community growing spaces by 2025
- Recommending to include Community Growing in Local Climate Action Plans
- Recommending to include Community Growing in National Climate Action Plan
- All Biodiversity Officers to be a point of contact for community growing initiatives
- Recommending every school to have a school garden & link with community growing spaces



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:



- **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:

016118



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 become 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](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.



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. 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/srcc1/chapter/chapter-5/>

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

Following the 2019 report above, the IPCC release 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.

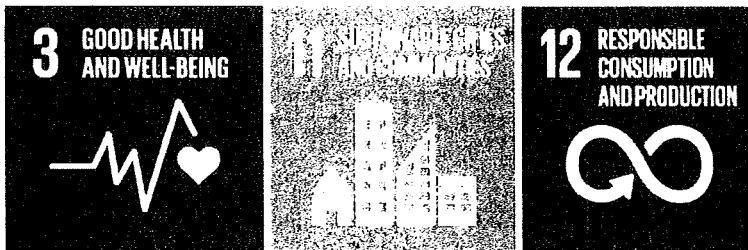
8.4.6 Urban-rural linkages: Urban food systems, as well as city-regional production and distribution of food, factors into supply chains. Reducing food demand from urban hinterlands can have a positive impact on energy and water demand for food production (Eigenbrod and Gruda 2015) (see ‘food system’ 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



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. Current National Climate Action Plan

The current National Climate Action Plan 2021 does not include any specific action regarding any government department encouraging local authorities to review, preserve or increase the number of allotments or community gardens in Ireland to help as a climate adaptation action.

Ref: <https://assets.gov.ie/224574/be2fecb2-2fb7-450e-9f5f-24204c9c9fbf.pdf>

Community Gardens Ireland believes that an urban agriculture or community growing action should be included as part of Section 9.4 Actions (Public Sector Leading by Example) of the National Climate Action Plan.

This action would require the Department of Housing, Local Government & Heritage to work with and encourage all public bodies to help support and facilitate allotments / community gardens on vacant, underutilised and derelict land or sites owned by public bodies throughout the country.

The Key Performance Indicator for this initiative would be an increase in the number of allotments & community gardens recorded across Ireland.



Example of Community Growing at Top of the City Community Garden, Waterford



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6 School Gardens

Community Gardens Ireland recognises that some excellent programmes are currently being rolled out for schools, however, this is not uniform across every school in Ireland.

There are many positive examples of a two-way interaction between community gardens and schools around the country with many having a close working relationship with local primary and secondary schools as well as after school projects.

The more community gardens there are the greater the potential for developing such links which benefit children enormously and can be easily facilitated in safe, uncomplicated and affordable ways as both schools and community gardens have public liability insurance in place. Examples include:

- 1. Mud Island Community Garden** in Dublin's north inner city Seed to Pizza project where local primary school children, accompanied and supervised by teachers and SNAs, learn to grow, harvest and mill wheat for flour, and subsequently learn to make pizza in the garden's pizza oven with chefs from a local Italian restaurant;
- 2. St Brigid's Community Garden** in Stillorgan County Dublin where school children actively participate in a School Garden Club which has a mini polytunnel, mini orchard, mini pasture, woodland, frog pond, chicken coop, beehive, and potting shed, all in less than a hundred square metres.

Both the schools in the community/community in schools' aspect and the importance of intergenerational interaction in the transmission of ideas and experience in terms of food-growing were highlighted in a participant survey at the DCU SeasonsPace events on school and community growing, October 2021.

Ideally schools should be encouraged and supported to allocate some space on its own premises for growing food (a minimum of 2 square metres, receiving adequate sunlight). Schools should receive financial support for the setup of these, if necessary, along with the necessary training for growing activities.

In addition, the more community growing spaces in Ireland that are provided, the better the links between these spaces and school gardens and school growing projects there will be.

This aligns with recommendations of the Junior All Ireland Pollinator Plan:

<https://pollinators.ie/wordpress/wp-content/uploads/2018/04/Junior-Pollinator-Plan-2018-WEB-1.pdf>



Other examples of school growing projects are below:



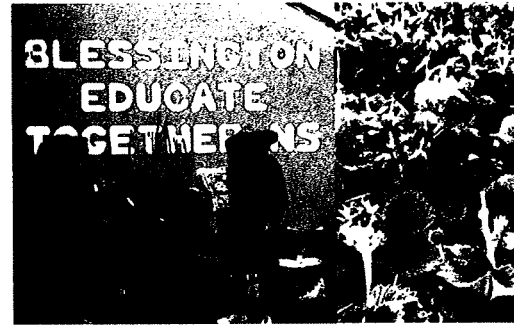
St Brigid's Community Garden



Walkinstown School Garden



Mud Island's Seed to Pizza Project



Blessington Allotments' EDIBlessington Project

Bord Bia: <https://www.bordbia.ie/primary-school/organic-gardening-for-primary-schools>

Biodiversity in Schools: <https://www.biodiversityinschools.com/school-gardens.html>

GIY Ireland: <https://giy.ie/programmes/grow-at-school/>



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7. Recommendations for the Climate Action Plan

The following are the recommendations for the Climate Action Plan from Community Gardens Ireland:

7.1 Recognising Community Growing as a Climate & Biodiversity Friendly Action for Communities

Based on the evidence that community growing spaces support and aid biodiversity, reduce carbon and GHG emissions, help urban food security, and help with adapting to climate change impacts, Community Gardens Ireland requests that the Climate Action Plan recognise and support allotments and community gardens as a local action that communities can complete to help reduce biodiversity loss and as a climate adaptation action.

7.2 Support the doubling of community growing spaces by 2025

Community Gardens Ireland requests the Climate Action Plan support the call for the doubling of allotments and community gardens by 2025 and for these spaces to be given additional protection in law to ensure long term community growing.

7.3 Recommendation to include Community Growing in Local Climate Action Plans

Local authorities have a function to create a climate action plan. As part of this, Community Gardens Ireland requests that National Climate Action Plan include a recommendation for all local authorities to include in their plans an increase in allotments & community gardens for each local authority area.

7.4 Recommendation to include Community Growing in National Climate Action Plan

Community Gardens Ireland believes that an urban agriculture or community growing action should be included as part of Section 9.4 Actions (Public Sector Leading by Example) of the National Climate Action Plan.

This action would require the Department of Housing, Local Government & Heritage to work with and encourage all public bodies to help support and facilitate allotments / community gardens on vacant, underutilised and derelict land or sites owned by public bodies throughout the country.

The Key Performance Indicator for this initiative would be an increase in the number of allotments & community gardens recorded across Ireland.



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7.5 Recommendation for all new Local Authority Biodiversity Officers to be a point of contact for local communities for local authority grow your own initiatives

Community Gardens Ireland believes that the Biodiversity Officers to be hired for all local authorities offers a unique opportunity for a single point of contact in all local authorities for growing your own initiatives, such as allotments or community gardens.

Community Gardens Ireland believes for larger gardens there is a need for paid co-ordinators, horticultural experts or maintenance people, and that ultimately this role should be facilitated or organised by the local authority. The Biodiversity Officer in local authorities could co-ordinate these roles.

7.6 Recommending every school to have a school garden & link with community growing spaces

Community Gardens Ireland recognises that some excellent programmes are currently being rolled out for schools, however, this is not uniform across every school in Ireland.

Ideally schools should be encouraged and supported to allocate some space on its own premises for growing food (a minimum of 2 square metres, receiving adequate sunlight). Schools should receive financial support for the setup of these if necessary, along with the necessary training for growing activities.

In addition, the more community growing spaces in Ireland that are provided, the better the links between these spaces and school gardens and school growing projects there will be. This would also encourage the transgenerational transfer of knowledge, and encourage life long growing between schools and community gardens.

This aligns with recommendations of the Junior All Ireland Pollinator Plan:

<https://pollinators.ie/wordpress/wp-content/uploads/2018/04/Junior-Pollinator-Plan-2018-WEB-1.pdf>



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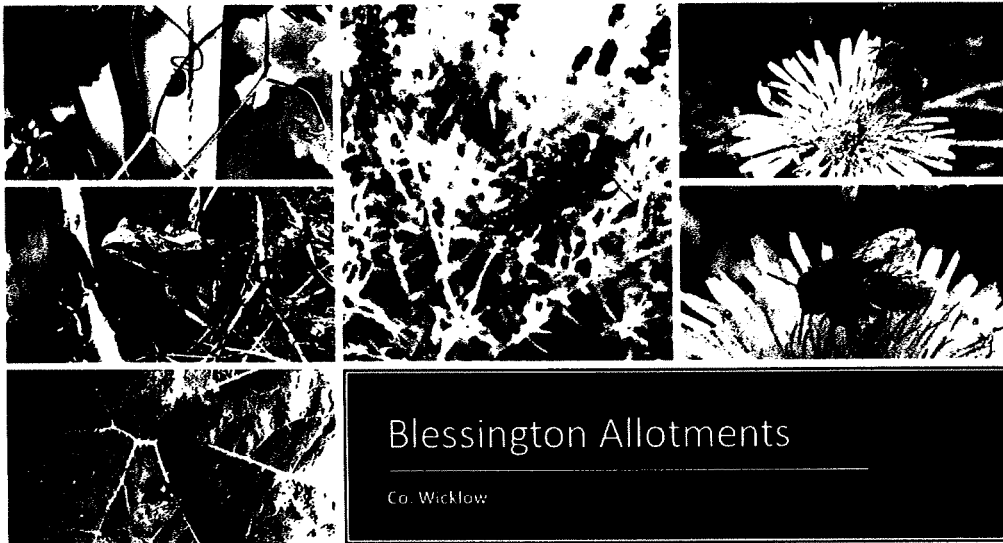
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Appendix 1 Supporting documentation for biodiversity & climate benefits from allotments & community gardens

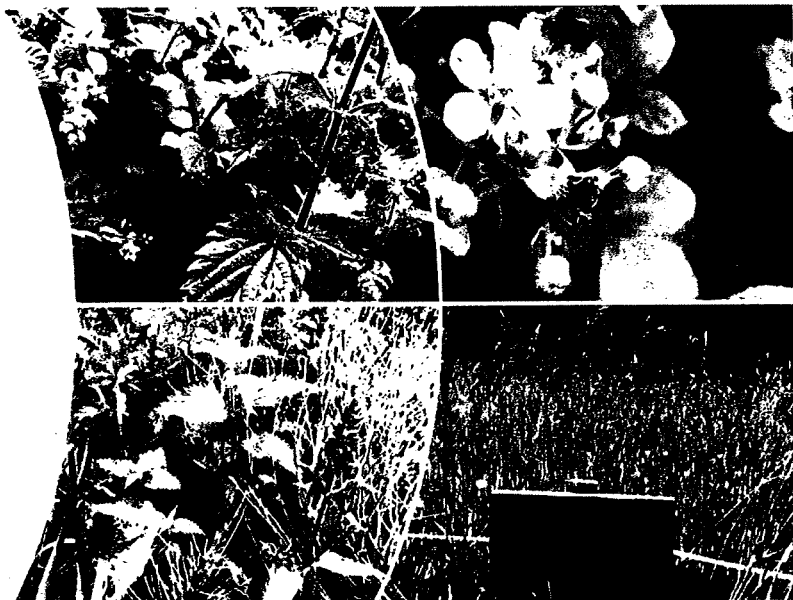
Source	Details	Link
Association for Public Service Excellence	Biodiversity and Allotments: Gardening in harmony with Nature	https://www.apse.org.uk/apse/index.cfm/news/articles/2020/biodiversity-and-allotments-gardening-in-harmony-with-nature/
IOPscience	Environmental Research Letter: Potential of urban 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



Appendix 2 Biodiversity examples from allotments & community gardens in Ireland



- Ballinlough Community Garden
- Cork City





Cork

1. Miniature Elstar apple tree, Angelica and Evening Primrose

2. Valerian, Ox-eye Daisy, Lavender, Hollyhock, Oregano, Catmint, Mullein, Joe Pie weed

Derry

- Symphytum uplandicum X Bocking 14,
- Inspire Well-being Allotment, Derry City
- 4 years on site, transplanted from a garden where it was from 2002.
- Herb Fennel behind it.





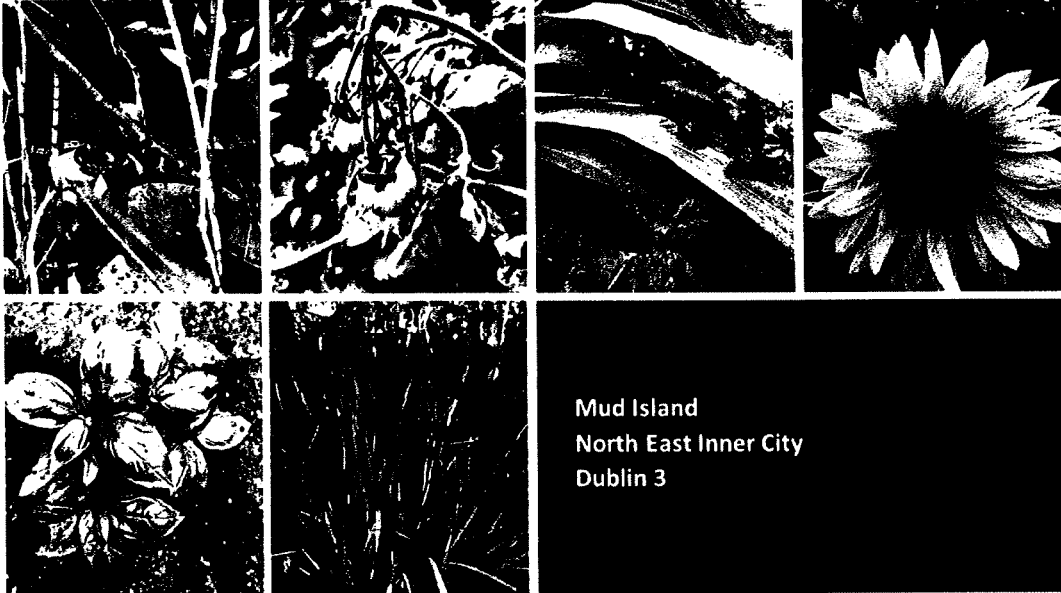
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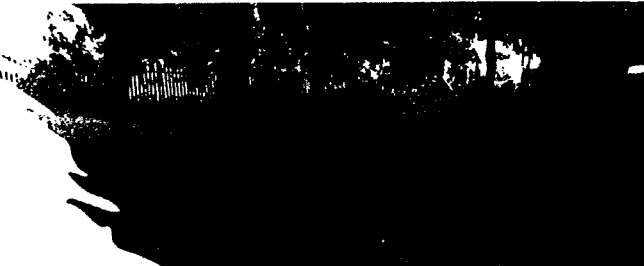


Muck & Magic Community Garden, Ballymun, Dublin 9

This is the cuckoo flower a rare wildflower found in the meadow area of muck and magic community garden



Photo of a mown path through meadow area in Muck and Magic creating an opportunity for wild flowers to grow also create habitats for bumblebees to nest





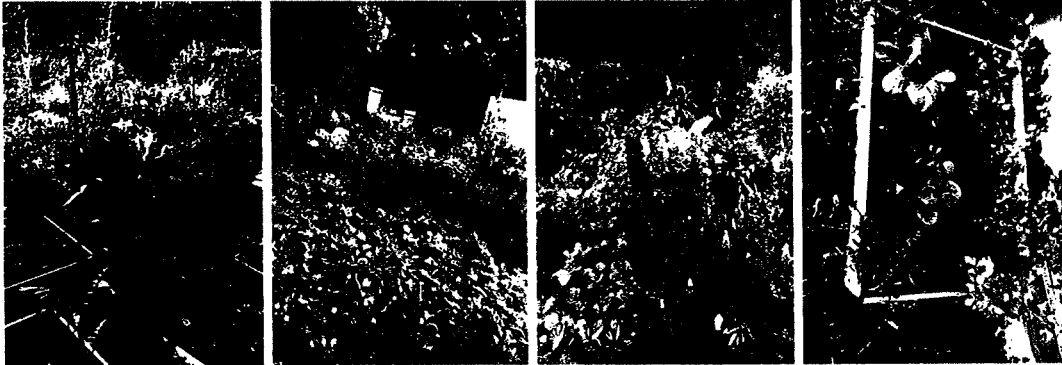
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Omagh, Tyrone



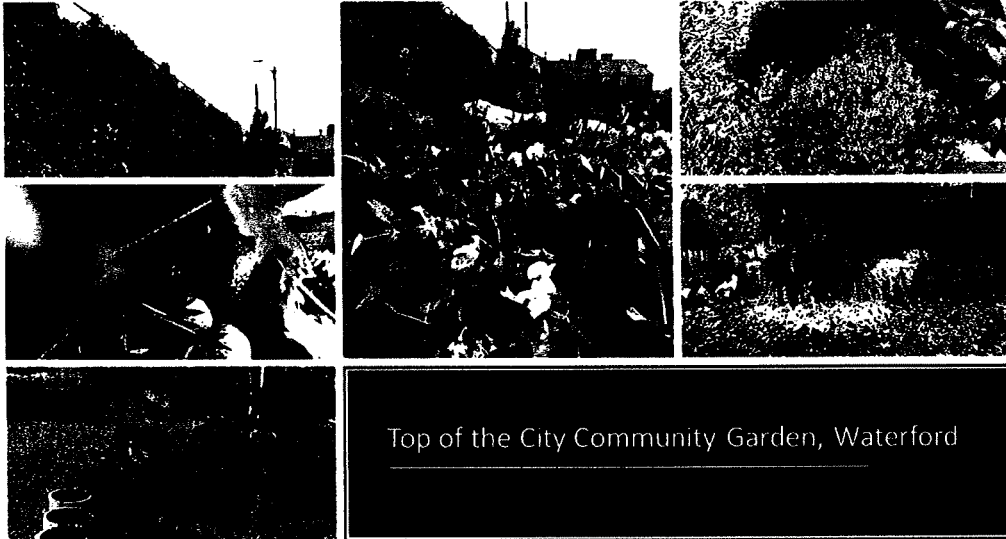
Powerstown
Allotments, Dublin 15



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Top of the City Community Garden, Waterford



Community Gardens Ireland
www.cgireland.org

