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‘Spatial Anarchy’ versus ‘Spatial Apartheid’: Rural Housing Ironies in Ireland and England

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Introduction

This paper examines rural housing issues in two countries: the Republic of Ireland (referred to hereafter as Ireland) and England. The rationale for comparing these two countries lies in the fact that planning systems in both countries share broadly a similar institutional ‘land-use management’ approach (CEC, 1997) and both countries have faced similar challenges to implement a spatial (territorial) shift to their planning systems (see for example in Ireland: Davoudi and Wishardt, 2005; in England: Tewdwr-Jones, 2001). However, the cultural norms and values regarding the regulation of rural space (and, consequently, rural housing) in both countries are strikingly different: while in England the rural planning regime has persistently resisted new rural housing development (Satsangi et al., 2010), in Ireland governmental policy has followed a more relaxed attitude to housing construction in rural areas (Scott, 2012).

The aim of this paper therefore, through a comparative *dialogue* of research and policy documentation between these two countries, is twofold. First, to explore and contrast the ideologies and dominant constructs that underpin rural housing issues in both countries. How are issues of rural housing construction (both private and social), affordability and ownership played out in each context? What narratives of rurality, and more importantly *whose* ruralities, have shaped policy frames and priorities in each country? Who lives in the

countryside, who is excluded and what is the universality of these experiences internationally? Second, we wish to contribute to the development of international comparative literature and research, which is particularly underdeveloped in the field of rural housing studies (an exception: Gallent et al., 2003).

We argue in this paper that for both countries, rural planning, and its effects on rural housing, represents a policy of failures and successes. More importantly, the failures of each system appear to be addressed in the other, creating perhaps the potential or illusion of an apparent rural housing ‘solution’ that needs to be communicated amongst planning practitioners, policy makers and researchers. In Ireland, on one hand, a permissive rural housing policy has resulted in uncontrolled housing growth, both within rural clustered settlements and in the open countryside (styled in this paper as ‘spatial anarchy’), and this has been accused of compromising environmental protection, public spending and urban residential living. On the positive side, though, Irish rural housing policy has been successful in maintaining a living and working countryside and has accommodated a relatively unproblematic pathway to homeownership, including for low income households. In England, in contrast, the planning system has succeeded in preserving visual aspects of the landscape – the renowned English countryside – but not without a cost: with limited supply of housing and spiralling rural house prices, rural living has become increasingly an exclusive experience of the few, a situation sometimes referred to as England’s ‘spatial apartheid’ (Hall et al, 1973).

From the English post war experience of a highly regulated “urban/rural divide” (Murdoch and Lowe, 2003) to an Irish spatial dystopia “where towns never end and the countryside never begins” (McDonald and Nix, 2005, 151), both systems of ‘spatial apartheid’ and ‘spatial anarchy’ appear to have adverse effects for rural communities. We look at policy

successes and failures in the following sections, emphasising and contrasting the experience between Ireland and England as regards land ownership, planning practice and housing policy. Finally we comment and discuss policy outcomes for both countries. Prior to the analysis of these issues some methodological considerations are presented in the following section.

The comparative method and other considerations

The paper presents an interpretive approach in comparing the two countries, whereby contextual differences in society, politics, culture and history are crucial in understanding planning and rural housing phenomena. Like Lowe (2012), we see this comparative analysis as a *dialogue* between Irish and English rural planning research and policy, rather than an exercise of formal and positivist comparisons. This dialogue is obviously important for the two countries involved, in terms of drawing lessons about best practice and exploring the transferability of policies between them (see also Hantrais, 2009; Masser, 1984). However, such a dialogue may also offer insights for planning policy and research internationally. Gallent and Allen (2003) for example argue that Irish planning resembles planning approaches in southern Europe, characterised by multiple laws and regulations, poor public support and recognition, and operating within atomistic family-oriented cultures. On the other hand, British (and in particular English) planning is positioned internationally as an ‘extreme case’ (Satsangi et al, 2010), characterised by persistent rural housing restrictions, market distortions and defence (at any cost) of a ‘rural idyll’ myth, drawing on romanticism and an open landscape aesthetic. The English planning system in its post-war establishment operated a rigorous separation between town and country, establishing a visible urban-rural dichotomy (Murdoch and Lowe, 2003). This is very different from the settlement systems in the European periphery (characterised by late industrialisation, compared to England), whereby

such divisions (i.e. urban/rural) are less prominent and conservation lobby groups have not been as powerful or elitist as in the English case.

While drawing on public data in both countries is helpful, we recognise that official statistics about rural areas in Ireland capture a very different rurality than that in England. For example, public datasets published by the Central Statistics Office in Ireland, consider rural all areas outside clusters of 1,500 or more inhabitants (CSO, 2011). In England the equivalent urban-rural cut off is 10,000 inhabitants, according to the Office for National Statistics (2004). Accordingly, almost 38 per cent of the Irish population is considered to be rural (CSO, 2011), while the English rural population accounts for 19 per cent (ARHC 2006; CRC 2010). Furthermore, language may be another barrier in international comparative analysis (Hantrais, 2009). On the surface language appears not to be a major obstacle in Irish-English comparisons, in that all public documents, data and policies, academic and grey literature in both countries are in English. However, a *lingua franca* by no means suggests a common culture, politics and policy mindset. Further, a common language might mask different meanings associated with particular words (see also Lowe, 2012 on the role of language in comparative research).

A further criticism in international comparative research is often an ‘asymmetrical’ or ‘imperialist’ approach (Hantrais, 2009), referring to the exclusion of native researchers (i.e. with local or contextual knowledge) from the comparison exercise. The asymmetrical fault, perhaps, becomes even more pronounced, when one aims to compare England and Ireland, due to the asymmetric history of the two countries. In the context of this paper, while both authors are affiliated and working in an English University and neither is Irish, one of the authors has been educated, worked and lived for almost a decade in Ireland. Partly to

overcome such imperialist tendencies, but partly also to emphasise that the English experience is exceptional in European terms while the Irish system is more common, we begin with the Irish case within each of the following sections of the paper, focusing on land ownership, planning policy and practice, housing policy and, finally, policy outcomes.

Land reform (or lack of) and the rural myth

The relationship between people and land has been particularly intense in the Irish case during a prolonged period of British colonialism, with land reforms both under British rule and following independence. The famine, economic stagnation and injustice experienced during the 19th century, coupled with widespread evictions, led eventually to increased demands for land and the ‘Irish Land War’, a successful land reform campaign for Irish peasant land ownership (see also Bull, 1996; King, 2000).

Land reform under British rule took place from the late 19th century through a series of Land Acts (1870-1920). It continued after independence in 1922 with the work of the Land Commission which acted as a facilitator of social engineering passing land on to smallholders and the landless. The continued hunger for land after independence ensured that the land reform question remained one of the most potent political issues until the early 1980s (Dooley, 2004).

Within half a century, landlordism was replaced by peasant proprietorship, irrespective of the size of landholdings (Commins, 2000). The transformation of the peasantry into landowners was further celebrated in the newly formed Irish state by culturally glorifying the land and its products, and in a sense “aristocratising” the peasantry (O’Toole, 1985). In the years following independence, the rural became a key symbol for Ireland. For example, the first

coinage system in the Free Irish State and later on in the Republic, until the introduction of the euro, exhibited, *inter alia*, a series of agricultural animals, celebrating farm life and agricultural production. De Valera's vision of Ireland was closely associated with the rural, a self-sufficient Republic of small farm owners, as evidenced in his famous speech 'The Ireland that we dreamt of':

The ideal Ireland that we would have [...] – a land whose countryside would be bright with cosy homesteads, whose fields and villages would be joyous with the sounds of industry, with the romping of sturdy children, the contest of athletic youths and the laughter of happy maidens, whose firesides would be forums for the wisdom of serene old age [...] (17 March, 1943).

These cultural affiliations between the State and the rural, were also later criticised for being inward-looking and for resisting modernisation and international exposure (de Paor, 1979; Pine, 1985). Nowadays, although the importance of agriculture has declined over the years, Ireland is still closely associated with the rural, particularly when compared with other European countries (McDonagh, 2001).

The struggle for land is ingrained in Irish national identity and psyche (Dooley, 2004), evidenced for example in a contemporary context, by an endemic obsession over property and homeownership (Norris and Redmond, 2005). More importantly perhaps this struggle for land in the Irish context might have undermined the planning regime that was created in independent Ireland, particularly regarding its *laissez faire* attitude towards rural housing (Duffy, 2000; Gallent et al., 2003). Clinch (2005) for example highlights the need to move on from the notion that any interference in what people do with their lands is returning to the

colonial period. Scott (2012) too argues that postcolonial narratives of a specific rurality have been used, particularly in the rural housing context, to equate planning restrictions with British colonialism (and therefore with oppression) in order to resist rural housing planning regulation.

In contrast to the Irish rural imaginary of a countryside populated by an owner-occupier peasantry or independent small farm owners, the English rural imaginary tends to exclude people in favour of the picturesque. This process began in the agricultural revolution and enclosures of the 16th to 18th centuries, such that “by the end of the 18th century, England had come to possess an agriculture which was self-consciously innovative, progressive and attuned to the needs of a growing market in food commodities. Uniquely in the ‘civilised’ world, the peasantry had all but disappeared” (Newby, 1987, 27). In this process of capitalist penetration, common rights were largely extinguished and small farmers economically and socially marginalised. By the end of the 19th century – at the height of the clamour for land reform in Ireland, Scotland and Wales – there was little demand for land reform in England (except from urban intellectuals). “The idea of peasant proprietorship was by now wholly inappropriate to English conditions. English farmers were demanding equitable treatment as *tenants* and not the wholesale expropriation of their landlords’ holdings” (Newby, 1987, 147). The idea of land reform in England (unlike in other parts of the British Isles) “slid into the backwaters of the contemporary political agenda” (Newby, 1987, 149-150). It is ironic, then, that the decline of the landlord-tenant system ensued: 25% of land in Britain changed hands between 1918-22, and by 1927 the proportion of owner-occupied farmland in Britain had risen from 10% to 36%, but this was a result of market forces and death duties rather than land reform. Rather than a struggle for land being ingrained in English consciousness, “those

landowners who departed did so with as much relief as regret, happy to off-load an increasingly troublesome asset of doubtful value” (Newby, 1987, 156).

Planning policy and practice: ‘same, but different’

Both countries share a similar institutional approach to planning, through regulating land use change via statutory land use plans (see also CEC, 1997). In recent years both countries have also shared similar challenges in reforming their planning systems and implementing a European-driven ‘spatial’ approach to territorial development (evidenced for example by the creation of the National Spatial Strategy (NSS) in Ireland and the, now abolished, Regional Spatial Strategies in England). Amidst the international economic crisis, national elections and changes of government in both countries, the Irish planning system has, thus far, been left almost intact (with the exception of additional taxation on land zoning and property, plans to amalgamate planning authorities and an effort to develop greater consistency with national and regional spatial policies). On the contrary, and while Ireland moves towards more ‘regional’ consistency, evidenced in the country’s Regional Planning Guidelines (DEHLG, 2010), in the English case, a radical move towards localism has been attempted with the Localism Act 2011 and the abolition of almost all regional planning and development structures. These centralised growth imperatives are implicit in the National Planning Policy Framework’s (NPPF) ‘presumption in favour of sustainable development’ (CLG, 2012, 3). More recently, the UK Chancellor has reiterated the government’s intention of loosening planning controls in England to facilitate development and promote economic growth, with the threatened sanction of central government taking over planning powers where local authorities are not sufficiently pro-growth. This was termed ‘muscular localism’ by the relevant Minister.

In the Irish case, the statutory planning system was introduced relatively late (compared to England) with the 1963 Local Government (Planning and Development) Act. Bannon (1989) argues that Irish planning, drawing on early English Planning Acts, developed as a regulatory tool focusing on stimulating physical and economic development (as part of radical economic reforms introduced in the 1960s), but devoid of any rural concerns and regional perspectives. Therefore, while the Irish planning system was modelled on the early origins of English planning, and implemented through local administration units dating from the colonial period (Laffan, 1996), the underpinning rationale between the two systems was markedly different. Unlike the experience of the English system to control development, particularly in rural areas (this is discussed later), the purpose of the Irish planning system was to stimulate development. Despite initial enthusiasm, the Irish planning experience is usually seen as one of limited achievement and scarce resources. Bannon (1999) argues that the failures of the planning system are linked to the primacy given to the individual and the immediate over the strategic and collective needs of society. Tendencies of intense localism and clientelism are well discussed in Irish academic and policy literature (Laffan, 1996; An Taisce, 2012). For example, in the rural housing context this is evidenced by locally elected representatives satisfying their voters through ensuring rural housing planning permissions (Curtin and Varley, 2002).

A shift towards strategic national planning came with the publication of the NSS (DOELG, 2002), which was heavily influenced by European and regionalist planning discourses (Davoudi and Wishardt, 2005). The NSS provided a national framework for dealing with spatial issues on an inter-regional basis and it contributed to the development, at least on paper, of a coordinated planning framework in the country operating at the national, regional and local scales. However, Gkartzios and Scott (2009) argue that this new discourse of spatial

planning in Ireland has not penetrated to the level of implementation (the local authority) where existing forms of land-use regulation and command and control policy instruments survive. This mirrors the experience in several other European countries (Healey, 2004).

The post-war planning system in England was forged by various wartime committees during the 1940s and given expression by the Town and Country Planning Act 1947: while this has been modified and refined in subsequent legislation it still provides the framework and rationale for rural planning policy. The Scott Report of 1942 envisaged that post-war rural England would be primarily agricultural and that rural England would prosper so long as agriculture was supported and agricultural land protected from development. Thus, since the 1940s, planning for rural England has given the greatest priority to urban containment, constraining rather than encouraging rural development. In the immediate post-war period the justification for this was the protection of farmland to ensure food supplies and the prevention of urban sprawl. When in the 1980s the Government determined that too much land was being farmed (leading to expensive surplus production which the EU was committed to buy), the justification for urban containment changed first to protection of the countryside for its own sake, and then to ‘sustainable communities’ and an urban renaissance. In 2012, the NPPF reaffirmed the priority of urban containment while conserving a rural aesthetic, through “promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it” (CLG, 2012, 5).

Newby argues that the 1942 Scott Report and the 1947 Town & Country Planning Act’s stance of urban containment and prevention of rural development derived from “a hopelessly sentimental view of rural life among nature-loving rambles and Hampstead dwelling

Fabians” (Newby, 1985, 225). He observes that “the rural poor had little to gain from the preservation of their poverty but were without a voice on the crucial committees which evolved the planning system from the late 1930s onwards.” It was no surprise, then, that “new housing was to be restricted – in both the public and private spheres – so that a planned scarcity of housing duly emerged... By the 1970s not only was public housing in rural areas in short supply, but so too was cheap private housing. In the case of both development control policy and housing policy, attempts to preserve the rural status quo turned out to be redistributive – and in a highly regressive manner” (Newby, 1985, 220) . Moreover, Newby (1985, 187) is adamant that these outcomes – a low-wage economy and unaffordable housing - “have not been haphazard nor the result of some immutable natural law, but the result of policy decisions quite consciously pursued.”

The findings of Hall et al. (1973) support this argument. In their seminal study of the containment of urban England, Hall and his colleagues found this derived from an “unholy alliance” of urban councils seeking to divert resources to the cities together with the rural middle-class seeking to preserve an exclusive countryside and to enhance their own property values. Similarly, Little’s study of Wiltshire (1987, 197) found that “the dominant rural ideology mediates against the poorer members of society by advocating anti-development and self-help as planning solutions... leading to a change in the structure of rural society and a widening of the gap between rich and poor.” Marsden et al (1993) echoed these findings in their work in Buckinghamshire, and this remains the case today (Shucksmith, 2012a). The major gainers were identified by Hall et al as wealthy, middle-class, ex-urbanite country dwellers and the owners of land designated for development. The principal losers his team identified were non-home-owners in rural England (including future generations) and people forced to live in dense urban areas despite the widespread aspiration to rural, or at least

suburban, living. They characterised this emerging spatial separation between rich and poor as “this very civilised British version of apartheid.” Summarising, they concluded that the effects of urban containment had been regressive in that “it is the most fortunate who have gained the benefits from the operation of the system, whilst the less fortunate have gained very little” (Hall et al, 1973, 409).

Despite the apparently similar systems of (land-use) planning in Ireland and England, the difference in the treatment of rural areas by the two systems is hard to miss from the early foundations of planning which undoubtedly shaped rural housing policy in the following years. In essence, while ‘rural’ was essential (as a space for conservation) in the 1947 English Act, it was relatively ignored in the 1963 Irish Act. Some of the rural housing issues arising are discussed further in the following section.

Rural housing: policy, politics and culture

The countryside in Ireland is characterized by a dispersed pattern of single detached dwellings or bungalows (usually self-built) commonly known as one-off housing. The pattern of single-detached houses in the Irish countryside is not a ‘celtic tiger’ phenomenon, despite the growth of rural housing during the boom years. In fact, the traditional form of rural settlement in Ireland is highly dispersed, with small farms and villages spread all over the country (Brunt, 1988; McGrath, 1998). Duffy (2000) suggests that the reproduction in more recent times of this dispersed settlement pattern is a product of the lax planning system. Notably, the system reflects the “reluctance by planners and politicians to obstruct what has been perceived as the revival of many long dormant communities and a popular apathy about conservation of the countryside” (Duffy, 2000, 223).

Another characteristic of Irish rural housing is its tenure. Finnerty et al. (2003) highlight the levels of homeownership in rural Ireland compared to social housing provision. The poor level of social housing provision in rural areas is, however, not only an indication of limited investment in social housing in the rural context, but also of the emphasis of social housing policy on homeownership. Norris and Fahey (2011) discuss how early in Ireland the rural working class enjoyed a right to purchase their homes, long before their counterparts in the UK. The authors also point that at no time in its history was the push for tenant purchase driven by the neoliberal ideology associated with similar policies in the 1980s in the UK. Instead, the shift to homeownership, was viewed by parties of both the centre-left and centre-right as a progressive form of wealth redistribution, which was compatible with welfare state principles (Norris and Fahey, 2011).

The publication of the Irish NSS (DOELG, 2002) offered an opportunity for addressing rural issues and managing rural settlements in the country. This strategy proposed a rural housing policy prescription with a distinction made between rural-generated and urban-generated (rural) housing, based on whether these housing needs were coming from people living in urban or rural (i.e. local) contexts. The distinction was made in order to accommodate rural-generated (i.e. local) housing needs in the areas where they arise. These themes, albeit more loosely, were further repeated in the 2005 Ministerial Guidelines for Sustainable Rural Housing (GOI, 2005), stating that people who are “part of the rural community” should be facilitated by the planning system in *all* rural areas and that housing needs in rural areas suffering persistent population decline should be accommodated. This distinction however proved hard to translate into practice (see also Gkartzios and Scott, 2009).

This pro-housing policy prescription is important because it placed an emphasis on the people for whom the developments were intended, calling for different responses based on a rural/urban (i.e. local/non local) division. This contrasts with the UK planning principle that planning should be concerned with the use of land, and not the user. Furthermore, this permissive housing policy discourse might also be seen as further facilitating homeownership. Combined with a widespread culture of self-built housing in the countryside (usually on family owned land), rural house building emerges as a relatively unproblematic pathway to home ownership (a situation very different to England, but similar in Southern Europe (Allen et al. 2004)). Indeed Census data show striking levels of homeownership in rural Ireland (almost 86 per cent), particularly amongst households who own their house with no loan or mortgage (46 per cent) compared with households in cities and towns (28 per cent) (Nolan and Maitre, 2009).

Attempts to introduce stricter policy controls made rural housing development one of the most contested political, environmental and planning issues in Ireland. In particular, pro-housing development interests have been promoted by the Irish Rural Dwellers Association (IRDA), a rural lobby group campaigning for private property rights and the ‘right to build’ in the countryside (see also Scott, 2012). More recently, given the collapse of the housing market in Ireland, the criticism of rural housing policies has focused on the pro-development ethos amongst rural Local Authorities (An Taisce, 2012), the role of the state on sponsoring private rural house construction (Gkartzios and Norris, 2011) as well as its neoliberal tendencies (Murphy and Scott, 2013).

As in rural Ireland, there is a shortage of social housing in rural England, though for different reasons, and in contrast to Ireland there is a strong presumption against single houses in the

countryside. The provision of social housing has historically been far lower in rural areas, both by councils and by registered social landlords (RSLs) who are now the main providers. Newby (1985) argues that, historically, it was in the interest of the farmers and landowners who controlled rural councils to limit council housing, both so as to maintain their control over the labour force through the system of tied housing, and to avoid the cost on them as major ratepayers. Since 1979 the small stock of social housing has been further depleted, as four rural homes have been sold under the tenant's right to buy (RTB) introduced by the Thatcher Government for every three built by RSLs (ARHC, 2006), and in some areas the stock of affordable housing has almost disappeared. The lack of social housing is most striking in the smallest settlements, where only 5% of homes are rented from councils or social landlords, compared to nearer 20% in urban areas. This reinforces their social exclusivity.

In England, one-off houses in the countryside are anathema to policy. In the 1940s, there was an acceptance that better rural housing was required: indeed the Scott Committee regarded “the improvement of rural housing as an essential prerequisite to the re-establishment of a contented countryside” (Scott Report, 1942, 48). It called for the building of cottages “as near as possible to the village or nucleated settlement” to relieve the housing shortage (50), on the grounds that “the farm worker and his family have far more chance of a happy social life and better opportunities of developing as self-reliant and responsible members of society if they live in a village. This is true of all dwellers in the countryside... Planning schemes should be so developed as to direct all new settlers into country towns and villages except where they can advance some decisive reason why they should be housed in the open countryside” (73). So settlement consolidation was justified, like much else at the time, on the basis that planners knew better what was best for citizens than the people themselves.

Murdoch and Lowe (2003) argue that the Scott Report and the 1947 Act made a reality of the idea of a strict rural/urban divide and the separation of nature and society, as exemplified in green belts and urban containment policies, and as promoted by the Council for the Preservation of Rural England (now called the Campaign to Protect Rural England, CPRE). Integral to these policies were concepts of ‘infilling’ and ‘village envelopes’, through which development could only occur within the existing boundaries of rural settlements. However, Murdoch and Lowe also highlight transgressions, on a range of scales. First, “by preserving ‘rural nature’, the governmentalities of planning ensure the enhanced attractiveness of the countryside to newly mobile households” (328). Indeed the population soon began to move “in increasing numbers from urban to rural areas to take advantage of the preserved countryside”, leap-frogging green-belts, and leading to “a growing separation between home and workplace and a tendency for people to travel further and further to work, notably by car (323). The authors conclude that “by protecting rural areas, planning simply makes them more attractive to urban migrants, especially in the context of car-based mobility” (323). Moreover, “the new (and transgressive) rural residents are likely to be natural supporters of the CPRE”, such that counterurbanisation reinforces the local politics of preservationism and makes these effects even more pronounced – while at the same time making the countryside ever more socially exclusive.

Attempts to counter this charge of elitism, and so to retain legitimacy, require further micro-scale transgressions, such as permitting ‘homes for locals only’ (Shucksmith, 1981) and ‘exceptions sites’, by which social housing for local needs may occur on land outside village envelopes where development would not normally be allowed (Best and Shucksmith, 2006). These technical fixes have echoes in the Irish devices of urban-generated and rural-generated

needs, but they have largely proved ineffective¹ except in legitimating the continuation of policies which serve the interests of the prosperous. In this context it is instructive to compare the influence of the CPRE in England with that of the IRDA in Ireland, and especially their uses of discursive power. This is considered in the discussion section below.

In the last ten years there have been several official, or semi-official, inquiries into the rural housing problem in England, prompted by its emergence as a major political issue on doorsteps during the 2005 general election. These include reports from the former Commission for Rural Communities (2006), Joseph Rowntree Foundation's Rural Housing Policy Forum (Best and Shucksmith 2006), Affordable Rural Housing Commission (2006), and Matthew Taylor's 'Living, Working Countryside' (2008). Their findings and recommendations are highly consistent. The unaffordability of housing in rural England derives from inappropriate planning policies and inadequate finance for social housing, along with political opposition from local residents. The remedies put forward include changing attitudes and better policies. Few of their recommendations have been implemented, however, and Shucksmith (2012b) has argued that the barriers are political, not technical. All are framed within a politics which seeks to maintain the social exclusivity of rural areas, except for 'deserving' local needs.

Outcomes: 'spatial anarchy' versus 'spatial apartheid'?

The outcome in Ireland has been the unprecedented increase of housing construction (NESC, 2004), provided in a low density fashion, a system termed here as 'spatial anarchy'. While one-off housing has been traditionally associated with self-built housing, the oversupply of housing during the boom years was also fuelled by developer-led housing, usually in clustered forms (housing estates) in sporadic rural locations in the country. The growth of

housing output until the collapse of the market was remarkable (see also detailed reviews in Murphy and Scott, 2013; Norris and Coates, 2013) and while prices have recovered a little, especially in Dublin, house prices on average in rural areas remained at lower levels compared to urban areas (DOECLG, various years).

In the Irish case, the attempt to reduce one-off housing by introducing higher density housing in rural areas (through developer-led suburban-style housing estates) has been criticised, because of the amount of numerous unfinished and vacant housing estates in the countryside, named by Kitchin et al (2010) as ‘ghost estates’. More clustered housing developments in the countryside could have been promoted in planning circles to address the low density fashion of rural housing settlements, but the inability of the planning system to monitor the quality and quantity of these developer-led estates, ultimately, has further exacerbated rural Ireland’s ‘spatial anarchy’.

Such ‘spatial anarchies’ are not uncommon in other Southern European countries characterised also by high levels of private homeownership (Allen et al., 2004; Castles and Ferrera, 1996). Where ‘spatial anarchies’ prevail, they exhibit both failures and successes. First, these planning systems struggle to regulate growth pressures in a strategic fashion. In that regard, the ‘success’ of the English system lies largely in its preservationist character, which, as argued in this paper, does not come without a cost – namely social and spatial exclusion. Secondly, such ‘spatial anarchies’ seem appealing in the individualist context because they satisfy a demand for private homeownership (also for lower income groups), but fail to address or to promote community responses to ownership and alternative tenure systems tailored to rural contexts. Furthermore, such systems appear to be more vulnerable to corruption and clientelism. These tendencies have been discussed in the Irish planning system

(An Taisce, 2012), but also in planning systems in southern Europe (see for example about illegal housing construction in Economou, 1997; Gallent and Allen, 2003).

Ironically perhaps, thinking about the English rural housing question, the success of such ‘spatial anarchies’ lies in allowing rural communities to grow and to diversify. Indeed, unlike the experience of counterurbanisation in England, Gkartzios and Scott (2012) report that in the Irish context, rural in-migration is a much more complex phenomenon than a middle-class trend, characterised also by blue collar and return rural migration. Therefore, a more lax regime may produce more socially equitable outcomes, as housing demands are often accommodated through new-build housing, both developer-led and self-build. However, in the Irish case this is rather an unintended benefit of the planning regime, rather than a direct policy that seeks to ensure an inclusive countryside. The diversity of populations living and ‘colonising’ the Irish countryside is probably linked to more widespread access to land through family background, wider self-build housing activity and lower house prices in the countryside.

The outcome of planning and housing policies in rural England is evident in the form of an ‘affordability gap’. The Government’s Affordable Rural Housing Commission (ARHC) and the former Commission for Rural Communities (CRC), among many others, have identified significantly higher “affordability ratios” (the ratio of house prices to incomes) in rural areas than in urban areas (ARHC 2006; CRC, 2007; 2010; but note Bramley and Watkins (2009) disagree). Generally most researchers acknowledge the unaffordability of housing as an issue in rural England (Satsangi et al, 2010). The most recent CRC (2010) analysis of government house price statistics shows that, uniquely amongst OECD countries, average house prices in rural areas have exceeded those in urban areas of England by around 25% every year since

reliable figures first became available in 2000. Indeed, the smaller the settlement size, the higher the price (see also CRC, 2010).

Across all rural England only 55% of newly forming households are able to afford a house in their own ward (Roger Tym & Partners, 2006), leaving an unmet affordable housing need of 22,800 homes per annum, on top of a backlog of a further 40,000 houses then required to meet existing needs. In the south-east, south-west and east regions the proportion unable to afford to buy local housing in rural areas was estimated to be nearer 70%. Research for DEFRA in 2006 (ARHC, 2006) showed that average rural earnings of £17,400 would only have allowed the purchase of a home in 28% of rural wards in England. Similarly a Commission for Rural Communities report (2006) reveals the degree to which smaller rural settlements in England are becoming the preserve of higher-income residents, even though scattered and hidden poverty remains even here. The data suggest that richer people are moving into and poorer people are moving out of rural England, in an ongoing gentrification which is particularly marked in its villages and hamlets. The housing market is the principal engine of this social change in rural England (Shucksmith, 1990). These arguments are echoed in a recent report (Griffith, 2011) about the undersupply of housing in England. The report argues that, contrary to the situation in Ireland and other countries during the boom years, housing supply remained unresponsive to increasing demand with marginal increases in residential investment. The report highlights endemic problems in the building sector in the UK, such as prioritising trading land over building new homes due to high land values, and a lack of small, medium-sized and self-builders within the industry. Both demand-led trends (i.e. gentrification) and supply-led problems of the building industry further support Hall's et al (1973) arguments on England's 'spatial apartheid'.

Discussion

This paper, based on an interpretive comparative analysis or a dialogue between Ireland and England, demonstrated endemic problems in both countries in relation to rural housing development. In both countries planning is widely regarded as negative, rather than promoting ‘good growth’, albeit from different perspectives. This contrasts with the Nordic countries, for example. These experiences are attributed to selective but different ideologies about regulating the ‘rural’, as well as contrasting attitudes to policy intervention and the state. These observations are discussed in this section below.

First, despite their contrasting responses to housing development, each country’s rural housing policies have been framed by dominant discourses of selective ruralities. Discursive power has been exercised in conceptualising and lobbying rural housing policy. In Ireland, a selective discourse of a ‘Republican rurality’ has been used by both policy makers and pro-rural housing groups. These discourses of rurality highlight opportunities for home and land ownership, ideas well situated with the country’s ‘Republican’ shift following Independence. Indeed, research by Norris and Fahey (2011) demonstrated how early in Irish housing policy priority was given to homeownership. The country’s first planning Act, unlike in England, largely ignored the rural as a space for planning intervention and rural conservation came at a later stage compared to the rest of Europe (Bannon, 1989). Additionally, Scott (2012) demonstrates how such selective ruralities drawing on Catholic and Celtic identities as well as postcolonial nationalism have been used by the Irish Rural Dwellers Association to support their arguments for resisting increasing rural planning regulation. In England, a ‘preservationist rurality’ has prevailed in policy discourses based on protecting a physical rural resource from urbanisation and industrialisation (Murdoch et al, 2003). These discourses are apparent in English policy from the very first post war Planning Act, which

was a victory for the rural preservationists (Woods, 2005), and they remain in contemporary policy documents such as the NPPF. For example, Sturzaker and Shucksmith (2011) demonstrate how constructions of a ‘preservationist rurality’ have been used by rural elites to frame discourses of ‘sustainability’ on their own terms, so exacerbating the unaffordability of rural housing, social injustice and spatial exclusion. Murdoch and Lowe (2003) as well are particularly critical of the way such discourses of rurality have been used by the Campaign to Protect Rural England (CPRE) to resist housing development in the countryside.

Second, the issues surrounding social mix and class mobilisation as a result of planning policy are more nuanced than they appear at first sight. Our review shows that both countries exhibit very low levels of social housing in rural areas. In Ireland private homeownership is the dominant rural tenure, a situation which tends to moderate income inequalities, given that low income households still have a considerable amount of housing wealth (Fahey and Maitre, 2004). In England social housing provision has been sabotaged either by farmers and landowners (Newby, 1985) or by neoliberal policies from the 1980s which sought to privatise social housing units. The social mix in Ireland is broader and research has demonstrated that the permissive Irish planning system has resisted phenomena characteristic in England such as gentrification (Gkartzios and Scott, 2012). However, the social mix in rural Ireland is not simply the result of a more liberal planning policy, but a result of a combination of factors including access to land which facilitates self-build housing construction. These key features could provide useful policy insights for England, a country that has demonstrated little appetite for land reform (unlike Scotland for example) and whose share of self-build housing is much smaller than in Ireland and other European countries (NASBA, 2011).

Third, the planning systems in both countries exhibit contrasting public attitudes to policy and the state. Planning seeks both to protect individual rights and to promote the collective good (the public interest), as manifest where development rights are nationalised. Individualism and familism prevail in Ireland and private property is sacrosanct. Proposals to curtail individual rights are often attacked as colonialist. The state's role in protecting the public good is also weak, with voluntary and community organisations often fulfilling collective functions. Similar attitudes are present in many parts of Southern Europe as well (Allen et al., 2004; Gallent et al., 2003). In England there is a stronger appeal to the community interest (or national interest), including in public policy arenas such as planning. However, the community and national interest is framed in terms of conservation policies, which protect the countryside as an amenity for urban dwellers. These interests tend to be defined and operationalized in ways which promote the private interests of wealthier individuals against poorer or less powerful people, and their private property rights are similarly regarded as sacrosanct. Private interests are thus prioritised in both countries, explicitly in Ireland but more clandestinely in England under the cloak of the public or community interest. In both cases, the planning systems operate to promote a perceived ethic of a certain time now past (private homeownership in Ireland; rural preservation in England). Ironically perhaps, despite the very different approaches, in both cases the results of rural planning appear to compromise the public good.

Finally, this paper contributes to the underdeveloped literature in comparative rural planning research. Our comparative analysis reveals selective but different constructions of rurality dominating policy discourses in both countries. This highlights the importance of deconstructing ruralities within diverse socio-spatial and cultural contexts. Comparative international planning research could explore what dominant ideologies underpin planning

decision-making as well as the power relations amongst different agents, offering an opportunity to ‘transcend the partiality and parochialism’ (drawing on Lowe, 2012) of planning policy and research (and, wider, of knowledge). A comparative lens challenges assumptions regarding development embedded in different planning systems. Comparative approaches are thus useful in promoting a culture of reflexivity required by planning academics and professionals, within postmodern tradition, to mirror and unveil their own normative understandings of regulating housing development in the countryside. For example, in the Irish case, a system termed here as ‘spatial anarchy’ might appear as such only in the eyes of planners and academics, and a system of clear logic to other interest groups, as it addresses issues of affordability, reinforcing local networks and family values. Similarly, characterising the English system as ‘spatial apartheid’ highlights the social injustice embedded in planning arenas in England, but downplays other factors. Other factors include land ownership and land reform as well as the role of various interests groups in regulating housing development such as the house-building industry and the planning profession itself.

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¹ Exception sites schemes do make a valuable contribution to meeting housing needs, but the numbers are very small. Moreover, from 2011, new 'affordable rents' of 80% of market rents are likely to restrict those who will benefit.