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Article

Participation Under Pressure: Land Use Planning in Ireland and Serbia

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Abstract

Public participation in planning, though a foundational democratic principle, faces implementation challenges across diverse planning systems worldwide. This study examines participatory planning practice in Ireland and Serbia – two contexts shaped by distinct planning traditions yet confronting similar tensions between democratic ideals and practice realities. Through comparative analysis of four local land-use planning instruments (Development Plans and Local Area Plans in Ireland; Spatial Plans and General Regulation Plans in Serbia), the research investigates how institutional design, power relations, and democratic commitments embedded within planning systems fundamentally shape participatory outcomes. Beyond external pressures such as neoliberalisation and democratic decline, the study demonstrates that the internal dynamics of participation, seen in the quality of dialogue, distribution of knowledge, strength of civic networks, and negotiation of power among stakeholders, ultimately determine whether participatory processes enable genuine democratic engagement or reproduce existing hierarchies. Methodologically, the research triangulates statutory regulations, public hearing documentation, and non-statutory participation records across multiple planning scales. Employing a four-dimensional analytical framework, including informing, consultation, collaboration, and monitoring, the analysis traces information dissemination strategies, consultation mechanisms, collaborative practices, and transparency structures. Findings reveal that, while both systems remain largely at the informing and consulting levels, critical differences emerge: Ireland demonstrates multi-channel, immersive approaches, feedback-oriented consultation, and structured collaborative experimentation, whereas Serbia exhibits statutory-minimal information provision, objection-based adversarial procedures, and exceptional rather than systematic collaboration. The study advances comparative European planning scholarship by identifying how planning cultures, legislative frameworks, and institutional responsiveness generate divergent participatory outcomes even under similar global pressures, offering practical insights for strengthening inclusive urban governance across varied institutional contexts.

Keywords: citizen participation; local land-use planning; comparative analysis; public input; transparency; Ireland; Serbia

1. Introduction

Public participation in planning is widely recognised as a cornerstone of democratic governance and a fundamental mechanism for negotiating collective values and spatial futures (Healey, 1997; Innes & Booher, 2004). Yet participation increasingly unfolds under conditions that systematically constrain its democratic potential: neoliberalisation reconfigures planning as market facilitation (Peck & Theodore, 2019), democratic backsliding weakens accountability structures (Swyngedouw, 2011), and technocratic depoliticisation narrows participation to procedural compliance (Legacy, 2017; Legacy et al., 2019). These pressures risk reducing participation to consultation fatigue or to the legitimisation of predetermined development agendas (Purcell, 2009).

However, global political-economic forces do not determine participatory outcomes in isolation. The form, quality, and effectiveness of participation depend fundamentally on institutional design, power relations, and democratic commitments embedded within specific planning systems (Bäcklund & Mäntysalo, 2010). Beyond external constraints, the internal dynamics of participation itself, i.e., the networks formed, relationships cultivated, knowledge exchanged, and power negotiated among planners, officials, and citizens, ultimately shape whether participatory processes enable genuine democratic engagement or reproduce existing hierarchies (Forester, 1999; Flyvbjerg, 1998).

Strengthening participatory planning has gained prominence not only in scholarly debates but also in global policy frameworks. The United Nations Sustainable Development Goal 11.3.2 explicitly calls for monitoring the “proportion of cities with a direct participation structure of civil society in urban planning and management that operate regularly and democratically,” establishing participatory planning as a measurable commitment within the *2030 Agenda for Sustainable Development* (UN, 2015). Similarly, the *New Urban Agenda* (UN, 2017) emphasises inclusive urban governance and stakeholder participation as essential for sustainable urban development. European policy frameworks, including the *Territorial Agenda 2030* (EU Ministers, 2020) and the *Urban Agenda for the EU* (EC, 2016), further reinforce participatory planning as a governance imperative. These policy commitments underscore the urgency of understanding how participation functions across diverse institutional contexts.

Against such a background, this paper examines local land-use planning in Ireland and Serbia as two contrasting yet strategically comparable contexts. Ireland operates within a discretionary planning tradition characterised by formally institutionalised public consultation embedded in a hierarchical system of development plans with statutory procedures for public input (Grist, 2019). Serbia’s planning system, conversely, inherits a post-socialist legacy in which participation was normatively embedded through self-management principles and legally mandated public hearings, yet implementation frequently fell short of enabling genuine citizen influence (Perić, 2026). Both systems now confront mounting demands for more inclusive and dialogical forms of participation amid financialised development pressures and broader democratic strains (Perić et al., 2025). The comparative value of these cases lies in their distinct institutional architectures – Ireland’s discretionary system enabling flexible adaptation beyond statutory minimums, Serbia’s conformance-based system constraining implementation within technocratic legacies (Maričić et al., 2018; Perić et al., 2021) – operating under shared contemporary pressures. Examining how different planning cultures and legislative frameworks shape participatory practice offers insights into the conditions under which democratic participation can be strengthened across varied institutional contexts.

Several foundational frameworks conceptualise public participation as a continuum of citizen influence. Arnstein’s (1969) ladder distinguishes non-participation, tokenism, and citizen power, demonstrating that formal compliance with participatory requirements often fails to deliver genuine citizen influence. Rowe and Frewer (2005) refine this by distinguishing communication (one-way, sponsor-to-public), consultation (one-way, public-to-sponsor), and participation (two-way exchange). Fung’s (2006) ‘democracy cube’ adds dimensionality through participant selection, communication modes, and authority wielded. The IAP2 (2018) spectrum identifies five ascending levels, ranging from informing to empowerment, each linked to distinct institutional commitments and power-sharing arrangements.

Drawing on these frameworks, this study employs a four-level analytical framework – informing, consultation, collaboration, and monitoring – synthesising established typologies while adding monitoring as a distinct participatory dimension, recognising the importance of transparency regarding how input influenced decisions.

- Informing: one-way communication providing citizens with information about planning processes and involvement opportunities (e.g. public notices, plan documents, information sessions, digital communication).

- Consultation: two-way communication in which citizens provide feedback while decision-making authority remains with planning authorities (e.g. written submissions, public hearings, surveys, drop-in sessions).
- Collaboration: partnership with shared decision-making power in developing planning solutions (e.g. workshops/charrettes, working groups, participatory budgeting, co-design, consensus-building).
- Monitoring: mechanisms that ensure transparency about how input influenced decisions and enable ongoing oversight of implementation (e.g., publication of submissions and responses, process reports, feedback to participants, accountability structures).

The paper is structured as follows. The introduction is followed by a brief methodological section. The central part of the paper first provides contextual background on the Irish and Serbian planning systems, tracing their institutional development, legal and regulatory frameworks, and participatory traditions, and then presents empirical analyses of Irish and Serbian cases, examining participation across the four dimensions. The discussion offers a comparative overview identifying cross-national patterns and divergences.

2. Materials and Methods

This study employs a comparative, multi-scalar analysis of public participation in spatial planning processes in Ireland and Serbia. The research focuses on four representative planning instruments – the Development Plan and the Local Area Plans in Ireland, and the Municipal Spatial Plan and the General Regulation Plans in Serbia – selected as typical cases that reflect established participation practices across different planning levels (county/municipal and local/sub-municipal). These instruments were selected for their institutional relevance and comparability in framing citizen engagement within each country's planning system.

Methodologically, the study follows a critical, context-sensitive narrative analysis of planning documents, situating each case within its broader governance and regulatory frameworks. The analysis integrates the legal, procedural, and discursive dimensions of participation, enabling a holistic understanding of how participatory mechanisms are structured and operationalised. Data triangulation was achieved through a systematic review of formal legislation and planning regulations, official records from public hearings, and available documentation of non-statutory participation practices.

The analytical process was guided by a conceptual model of participation encompassing four progressive levels – informing, consultation, collaboration, and monitoring – which served as an interpretive framework for identifying and comparing participatory practices. Within this framework, the study traced specific indicators across the selected documents, focusing on (1) mechanisms of information dissemination, (2) procedures and tools for public consultation, (3) evidence of collaborative planning activities, and (4) approaches to monitoring and feedback. This systematic tracing enabled a comparative understanding of institutionalised participation and its contextual adaptations within the two contrasting governance systems.

3. Results: Participatory Planning in Ireland and Serbia

The subsequent section provides an in-depth examination of the participatory planning process in the two selected countries. Our analysis is structured around four key dimensions of participation in a planning process, as previously introduced in the conceptual overview: informing, consultation, collaboration, and monitoring. The analysis will be applied to four cases: two higher-tier plans (the Fingal County Council Development Plan and the Spatial Plan for the part of Surčin Municipality) and two lower-tier plans (the Flemington Local Area Plan and the General Regulation Plan of Palilula Municipality). To contextualise this multi-scalar analysis, we first present a concise overview of: (1) the societal context, (2) legal/regulatory frameworks of governing planning participation, and (3) the general public participation procedure, in both Ireland and Serbia.

3.1. Ireland: Participatory Planning in a Discretionary System

Contextual features. The country's planning culture has been shaped by its post-colonial relationship with Britain and by its integration into the European Union from 1973 onwards, which introduced European spatial planning concepts and participatory governance norms (Kitchin et al., 2012). The late 20th and early 21st centuries saw significant transformations in Irish planning practice. The 'Celtic Tiger' economic boom (1995-2007) brought rapid urbanisation and development pressures, characterised by pro-development policies and accelerated decision-making processes (Mercille & Murphy, 2015). This was followed by the 2008 economic crisis and subsequent austerity measures imposed as conditions of the EU-IMF (European Union-International Monetary Fund) bailout (MacLaran & Kelly, 2014). This period exposed tensions between development-led growth policies and planning regulation, raising questions about the effectiveness of public participation mechanisms in moderating speculative development (Lennon & Waldron, 2019).

The post-crisis period has witnessed growing civic mobilisation around planning issues, particularly housing affordability, urban densification, and climate action, alongside debates about the balance between democratic input and efficient decision-making in the planning system (Grist, 2019). Civil society organisations, residents' associations, and community groups have become increasingly active in planning processes, utilising statutory consultation mechanisms and third-party appeal rights. However, participation remains uneven across different socio-economic groups and geographic areas, with concerns about the accessibility and inclusiveness of formal consultation procedures.

Planning legislation and regulations. Unlike the planning systems of continental Europe, the Irish planning system is discretionary in nature and most closely resembles the British typology (Booth, 1996). The right to develop land or property is controlled by the state through the development management process, which requires applicants to lodge planning applications with the relevant local planning authority. However, Ireland's planning legislation has been consolidated into a single comprehensive statute: the Planning and Development Act 2024 (Government of Ireland, 2024) governs the planning system and establishes statutory provisions for public participation, distinguishing between plan-making (a reserved function of elected councillors in creating city and county development plans) and development management (an executive function of planning officials in handling individual planning applications).

Complementing the primary legislation, statutory regulations provide detailed procedural requirements for public consultation, including notification methods, timeframes, and documentation standards. Government-wide Consultation Principles and Guidance (Department of Public Expenditure, 2016) established overarching standards for public consultation processes across policy-making and legislative development, including planning. Additionally, sector-specific guidance documents, such as those issued by the Office of the Planning Regulator, provide best practice recommendations for conducting meaningful public engagement in plan-making processes. The statutory framework establishes mandatory consultation stages for both development plans (pre-draft consultation, draft plan display, and material alterations) and development management (public notice requirements and third-party appeal rights to *An Bord Pleanála*, the independent planning appeals board).

Public participation procedure. The 2024 Planning and Development Act (Government of Ireland, 2024) outlines the statutory process for public engagement and feedback on draft planning documents, varying by planning document type. County Development Plans involve public engagement in two main stages: an 8-week pre-draft phase and a 10-week draft phase, with an additional 4-week consultation if material amendments are proposed. Local Area Plans (LAPs) require one 6-week draft consultation period, with an additional 4 weeks for major post-draft changes. In practice, non-statutory pre-draft consultation phases for LAPs have become widely adopted by local authorities across Ireland, providing opportunities for early-stage citizen and community input to inform the preparation of draft plans (Tallon, 2025). For development management, applicants must publish site notices and newspaper notices inviting submissions

within a specified period (typically 5 weeks). Those who submit to the local planning authority may appeal decisions to *An Bord Pleanála*, the independent planning appeals board, thereby providing third-party appellants with a mechanism to challenge decisions beyond the initial consultation phase.

During statutory consultation periods, the public can review draft plans online and at designated locations, and may submit written observations and submissions. Local authorities publish all submissions received online. Upon conclusion of each consultation phase, the Chief Executive prepares a statutory report responding to all submissions and observations, together with recommendations on whether submissions should shape or modify the plan. The Chief Executive’s report does not provide individual replies; instead, it aggregates and analyses the issues raised, categorising submissions by theme or Development Plan chapter. Major statutory bodies receive detailed standalone treatment. The report summarises key issues – for example, grouping recurring concerns under single headings – before presenting the Chief Executive’s formal opinion, citing relevant national policy or technical evidence, and clear recommendations indicating whether the plan should be amended or remain unchanged. Each recommendation is assessed for compliance with Specific Planning Policy Requirements and national guidelines; submissions may be rejected if they conflict with statutory obligations. Local elected councillors consider all submissions and the Chief Executive’s recommendations during the adoption process, deciding whether to accept, modify, or reject these recommendations.

Informal public consultation may occur alongside statutory procedures. A survey research indicates that Irish local authorities employ various informal consultation methods, including in-person public meetings (79% of authorities), community workshops (75%), social media engagement (71%), and online surveys (67%); however, only 44% of local authorities report following a recognised policy framework for non-statutory engagement, with innovation relying more on individual initiative than institutional strategy (Tallon, 2025). Finally, although being informal, public consultation is still regulated through various documents, such as the Development Plans Guidelines for Planning Authorities (DHPLG, 2022) and the Guide for Inclusive Community Engagement in Local Planning and Decision-Making (DRCD, 2023).

3.1.1. Fingal County Council Development Plan

The Fingal County Development Plan, prepared in 2021, followed a two-stage statutory public participation process comprising an 8-week pre-draft phase and a 10-week draft phase, with an additional 4-week consultation period for material amendments. The participatory procedure, comprising four key phases (informing, consultation, collaboration, and monitoring), as well as the nature of participation (statutory / non-statutory), is described in Table 1.

Table 1. Public participation in the Fingal County Development Plan. Source: Authors based on various sources.

Participation level	Statutory participation	Non-statutory participation
Informing	Pre-draft: - Public notice: Fingal Independent, Irish Independent, The Herald, Gazette, North Side People, 12 March 2021 Draft: - Public notice on plan-making	Pre-draft: - Strategic Issues Paper and Information Booklet: printed and online, circulated to all county households - Dedicated webpage: www.fingal.ie/developmentplan - Social media campaign: Twitter, Facebook, Instagram, LinkedIn, YouTube (video clips, consultation updates, webinar recordings) - Podcasts and article in Fingal News e-zine (Issue 18, pages 4-5)

	Draft plan available digitally and in analog format	- Four online thematic webinars: April 2021 (recordings available) - Posters at bus stops throughout county Draft: - Draft Development Plan webinar: 22 March 2022 (recording available online)
Consultation	<i>Pre-draft:</i> - Online portal for themed submissions - Public submissions: available in full via Fingal Consultation Portal <i>Draft:</i> - Public submissions	<i>Pre-draft:</i> - Online portal for themed submissions <i>Draft:</i> - Drop-in sessions (4pm–8pm): County Hall Swords (31 March 2022), Blanchardstown Library (5 April 2022), Malahide Library (20 April 2022), Bracken Court Hotel Balbriggan (21 April 2022)
Collaboration		<i>Pre-draft:</i> - Three councillor briefing workshops: 30 November 2020, 27 January 2021, 2 February 2021 (plan-making process, elected member role, environmental assessment) - Consultation with prescribed bodies and other stakeholders - Minecraft event for young people focused on Rogerstown Estuary area redesign (green spaces, bike paths, biodiversity, community facilities)
Monitoring	- Chief Executive Report addressing submissions (pre-draft, draft and post-draft phases) - Full submission published via Fingal Consultation Portal	Webmap: Fingal County Development Plan 2023–2029 (n.d.)

Several observations warrant attention regarding Fingal's participatory process. The statutory response process encompassed three formal Chief Executive's Reports, each corresponding to a different consultation stage of the Development Plan 2023–2029. The first report addressed pre-draft submissions and outlined initial issues and recommended policy directions (Fingal County Council, 2021). The second report reviewed public and stakeholder feedback on the Draft Plan, including approximately 2,000 submissions, and provided chapter-specific recommendations (Fingal County Council, 2022a). The third report evaluated submissions on the Proposed Material Alterations and provided refined recommendations prior to the plan's adoption (Fingal County Council, 2022b).

Fingal County Development Plan demonstrates a variety of non-statutory forms of participation. Notably, the Minecraft event for young people proved particularly successful, with high demand necessitating a second session in July. Participants focused on design solutions for the Rogerstown Estuary area. The geographically distributed drop-in sessions during the draft phase were scheduled

from 4 pm to 8 pm to accommodate working residents. The multi-channel information dissemination strategy, combining both digital and analogue formats, aimed to reach diverse demographic groups across the county. The publication of all written submissions in full through the Fingal Consultation Portal exceeded statutory transparency requirements.

3.1.2. Flemington Local Area Plan

The Flemington Local Area Plan, prepared in 2024, followed a one-stage statutory public participation process comprising a 6-week draft phase, with no additional consultation period due to the low number of submissions received. Informal pre-draft participation was enabled. The participatory procedure, comprising four key phases (informing, consultation, collaboration, and monitoring), as well as the nature of participation (statutory / non-statutory), is described in Table 2.

Table 2. Public participation in the Flemington Local Area Plan. Source: Authors based on various sources.

Participation level	Statutory participation	Non-statutory participation
Informing	Draft: ● Draft plan available for inspection: 10 September-22 October 2024 ● Physical locations: Civic Offices Blanchardstown, County Hall Swords (weekdays 9am–5pm, Fridays until 4:30pm) ● Online portal: https://consult.fingal.ie/en/browse	Pre-draft: ● Issues Paper ● Leaflet Draft: ● Physical locations: Balbriggan Library (during opening hours)
Consultation	Draft: ● Submissions (online and written): 22 received (https://consult.fingal.ie/en/node/35059/submissions).	Pre-draft: ● Public information drop-in session: Hamilton Suite, Bracken Court Hotel, Balbriggan, 13 February 2024 (4pm–7pm). ● Submissions (online and written): 16 received (https://consult.fingal.ie/en/node/34520/submissions) Draft: ● Information day drop-in session: Flemington Community Centre, Hamlet Lane, Balbriggan, 18 September 2024 (4pm–7pm).
Collaboration		
Monitoring	● Chief Executive Report addressing submissions on the draft LAP ● Full submission published via Fingal Consultation Portal	

The Flemington Local Area Plan demonstrates the widespread practice among Irish local authorities of conducting non-statutory pre-draft consultations for Local Area Plans, extending beyond statutory requirements to enable early-stage participation and feedback gathering. However, the participatory mechanisms employed remained primarily within the informing and consulting levels. While the Issues Paper, leaflets, and drop-in sessions enhanced transparency and enabled early-stage input, these tools primarily served to disseminate information and gather resident feedback rather than to enable collaborative decision-making or shared authority over planning outcomes. The statutory response process encompassed one formal Chief Executive's Report on the draft Flemington LAP (Fingal County Council, 2024).

The modest increase in submissions from 16 (pre-draft) to 22 (draft) raises questions about the reach and effectiveness of engagement strategies, particularly given that Flemington is a growing area with substantial new residential development. The reliance on traditional participation methods – physical inspection of documents, drop-in sessions, and written submissions – may limit accessibility for certain demographic groups, including younger residents, non-native English speakers, or those with limited time availability. The absence of collaborative mechanisms, such as workshops, co-design sessions, or ongoing community forums, suggests that participation was structured to inform plan content rather than to empower residents as active partners in shaping the future development of their local area.

3.2. Serbia: Participatory Planning in Transition

Contextual features. For most of the 20th century, Serbia (first as part of Yugoslavia and then as an independent state) was a socialist state with a centrally planned economy. During the socialist period, planning was characterised by technocratic, top-down decision-making with limited opportunities for public participation, though Yugoslavia's self-management system did provide some channels for worker and local community involvement in certain development decisions (Perić, 2020a; Nedović-Budić & Cavrić, 2006).

In late 2000, Serbia established a democratically elected government for the first time in more than half a century, marking the start of a pluralist political culture and a re-decentralisation of power. The embrace of political pluralism and European integration processes created normative pressures to adopt international standards of public participation in planning (Lazarević Bajec, 2009). However, the transition period was marked by the absence of appropriate measures, institutional capacity, and political reforms when embracing a market-driven economy, constituting 'a growth without development' (Zeković & Vujošević, 2018). In addition, Serbian society has been described as a 'proto-democracy' (Vujošević, 2010), with a legacy of technocratic planning culture, low trust in public institutions, and limited civil society capacity following decades of authoritarian rule, which have created substantial challenges for establishing meaningful participatory mechanisms.

Planning legislation and regulations. The evolution of Serbia's planning legislation reflects shifting approaches to public participation since 2000. The 2003 Planning Act (OG RS 47/2003) removed the requirement for expert debate and abolished provisions for informing the public of the commencement of public consultation procedures, leaving only deliberation among members of the Planning Commission, which is responsible for approving various planning instruments. This represented a significant reduction in the number of participatory mechanisms compared with previous legislation (Čolić, 2009). The 2009 Planning Act (OG RS 72/2009) maintained limited participatory provisions, with public participation primarily confined to statutory public hearing procedures during which citizens could submit written objections to draft plans. A 2014 amendment to the Planning Act (OG RS 132/2014) introduced 'early public hearing' as a new mechanism, allowing citizens to express opinions on planning issues during the initial phase of plan preparation, before formal drafting begins. In addition, the recent by-law introduces a digital early public hearing (OG RS 32/2019, 47/2025). Recent policy developments have introduced frameworks addressing public policy formulation (OG RS 30/2018), enhanced citizen participation in local governance (OG RS 8/2018), municipal capacity development for European Union accession (OG RS 111/2021), and

collaborative arrangements involving public institutions, private sector, civil society, and academic organisations based on multi-level and grassroots governance approaches (Ministry of European Integration, 2023). However, as Serbian planning operates primarily on the principle of legal conformance rather than performance-based evaluation (Perić et al., 2021), legal adoption does not guarantee implementation, resulting in a persistent gap between formal participatory requirements and actual practice throughout the post-2000 period (Perić, 2020b; Pantić et al., 2026).

Public participation procedure. According to the relevant planning framework (OG RS 132/2014), the participation procedure has two steps (an early public hearing and a public hearing) and may be supported through informal participation. An early public hearing follows the formal decision to prepare a spatial or urban plan, prior to drafting. It lasts 15 days and is open to the public. Concurrently, mandatory inputs (“conditions”) are collected from public institutions. Both sources inform the draft planning document. Following the early public hearing, the institution preparing the plan produces a Report on Public Hearing, which the Planning Commission adopts. The plan is developed by a body selected through public procurement. The Planning Commission, established within national or local government, comprises spatial and urban planning experts, with one-third nominated by the ministry responsible for spatial and urban planning.

Public hearing occurs once the Planning Commission has verified the draft plan. The draft is presented to the public for 30 days (or 15 days for abridged procedures or repeated hearings). Abridged procedures apply when minor plan revisions are undertaken under the Planning Act. The public hearing is announced in print and online media, allowing the public to submit objections and comments. A report documenting all submissions is prepared. Before finalising this report, a public session is held at which each response is read aloud, and submitters may discuss their objections or comments with the planning institution and the responsible government body. Since the 2025 by-law amendments, online presentations of responses are permitted. This session has become increasingly well-attended and often serves as a forum for debating divergent viewpoints. Final responses to submissions inform revisions to the draft before plan adoption.

Informal public consultation may occur alongside or independently of statutory procedures. While not widespread in Serbia, informal consultation takes various forms (Čolić & Dželebdžić, 2018): public presentations at the sub-municipal level, local municipality websites, info-points, exhibitions, and printed promotional materials (information phase); discussion groups with stakeholders and public-private dialogue (consultation phase); workshops and visioning exercises (collaboration phase). These activities are not defined in legal acts but do not contradict them. Both statutory and non-statutory participation can be monitored and measured using the Index of Participation (Milovanović Rodić, 2024), inspired by the UN SDG indicator 11.3.2.

3.2.1. The Spatial Plan for the Part of Surčin Municipality

The Spatial Plan for the part of Surčin Municipality was developed between 2009 and 2012, and the respective participatory planning procedure was implemented under the 2009 Planning and Construction Act, prior to the 2014 amendments that introduced the early public hearing mechanism. Consequently, the participatory process comprised a single statutory stage: a 30-day public hearing on the draft plan, accompanied by a public session organised by the Planning Commission. This case, therefore, represents the participatory framework that preceded the introduction of the two-stage consultation model currently in force. The participatory procedure, comprising four key phases (informing, consultation, collaboration, and monitoring), as well as the nature of participation (statutory / non-statutory), is described in Table 3.

Table 3. Public participation in the Spatial Plan for the part of Surčin Municipality. Source: Authors based on various sources.

Participation level	Statutory participation	Non-statutory participation
Informing	- Public notice: daily newspaper Blic, 26 January 2015 - Draft plan on public view: local self-government unit and urban municipality of Surčin premises, 26 January-26 February 2015 - Direct notification to selected national and local public institutions	
Consultation	- Public session of the Planning Commission: 26 March 2015 - Total submissions: 38 (13 from public institutions; 25 from individuals and private enterprises) - Total objections: 122 (23 submissions with single objection; 15 submissions with multiple objections) - Objection outcomes: 65 accepted, 24 partially accepted, 23 rejected, 10 irrelevant	
Collaboration		
Monitoring	Report on Public Hearing: verified by Planning Commission of the City of Belgrade, 26 March 2015	Report delivered to Central Registry of Planning Documents

Several observations merit attention. First, the public hearing was announced in the daily newspaper two days after its commencement. Second, the Report on Public Hearing bears the same date as the Planning Commission's public session (26 March 2015), suggesting no revisions were incorporated following the session. This indicates the presentation functioned as information dissemination rather than consultation with feedback, representing a missed opportunity for meaningful exchange. Third, the report contains no information on attendance at the public session, leaving the extent of public engagement unclear.

The submission and objection process demonstrates consultation-level participation, where citizens provided input, but final decision-making authority remained with the Planning Commission. Of 122 objections raised, 53% were accepted (fully or partially), 19% were rejected, and 8% were deemed irrelevant. According to statutory requirements, every rejected or irrelevant objection should be explained in the report and during the public session, when interested parties may provide additional clarification to potentially alter the Planning Commission's response. However, the absence of collaborative mechanisms – such as workshops, working groups, or co-design sessions – meant that participation remained limited to the submission of objections rather than shared decision-making or partnership in plan development. Further analysis of objection content would be valuable, including classification by submission type, objection topic, public versus private interest, and the justifications provided for acceptance or rejection.

3.2.2. The General Regulation Plan of Palilula Municipality

The first draft of the General Regulation Plan of Palilula Municipality (of the City of Niš) was developed in 2015, so the respective participatory planning procedure was implemented under the 2014 Planning and Construction Act, which enabled a two-step public hearing process: an early public hearing was held in 2016, and the public hearing in 2021. The participatory procedure, comprising four key phases (informing, consultation, collaboration, and monitoring), as well as the nature of participation (statutory / non-statutory), is described in Table 4.

Table 4. Public participation in the Plan of General Regulation of the Palilula Municipality. Source: Authors based on various sources.

Participation level	Statutory participation	Non-statutory participation
Informing	Early public hearing: - Public call for early public hearing: daily newspaper <i>Danas</i>, 5 April 2016 - Draft plan on public view: local self-government unit premises, 12-26 April 2016 Public hearing: - Public call for public hearing: daily newspaper <i>Srpski Telegraf</i>, 20 January 2021 - Draft plan on public view: local self-government unit premises, 20 January-18 February 2021 - Updated draft plan on public view: local self-government unit premises, 11-25 February 2022	- Poster with plan area boundary displayed in city administration building - Information on public hearing posted on city administration information board - Professional urban planner available during public hearing for stakeholder inquiries - City assembly meeting agenda (including plan adoption) publicly available prior to meeting
Consultation	Early public hearing: - No objections or suggestions submitted Public hearing: - Public session: 24 February 2021 - Public session for repeated public hearing: 9 March 2022 - Total submissions: 14 in first procedure, 9 in repeated procedure - Regular procedure: 1 submission from group of citizens (attorney-represented), 13 from individuals - Repeated procedure: 9 submissions from individuals - Objection outcomes: 12 accepted (first), 8 accepted (repeated); 1 rejected (first), 1 rejected (repeated); 1 irrelevant (first), 0 irrelevant (repeated).	- Sessions attended by submitters, other interested parties, and media - Iterative procedure (early, regular, repeated) enabled interaction and basic cooperation during plan elaboration

Collaboration		
Monitoring	Report on Public Hearing: verified by Planning Commission of the City of Niš, 28 May 2021 and 25 March 2022	Report delivered to Central Registry of Planning Documents and published on local self-government unit website

Based on the General Regulation Plan of Palilula Municipality, several observations warrant attention. First, the plan elaboration extended over seven years (2015-2022) and involved three public hearing iterations – early, regular, and repeated – significantly exceeding the statutory minimum. This extended timeframe, while prolonging the planning process, provided expanded opportunities for public engagement. Second, divergent positions between the plan-maker (the planning department within the City of Niš) and the decision-maker (the Planning Commission) regarding objections raised during the first hearing were resolved through the repeated procedure, suggesting an institutional alignment process through iterative consultation. Third, the Planning Commission’s decision to require a second public hearing after incorporating accepted objections demonstrates responsiveness to public input, though this iterative approach also reflects the complexity of resolving changes in land ownership status between the public and private sectors. Fourth, the high acceptance rate of objections (12 of 14 in the first procedure, 8 of 9 in the repeated procedure) indicates substantial incorporation of public feedback through the consultation process. However, the absence of collaborative mechanisms (workshops, working groups, or co-design sessions) meant that participation remained within the informing and consulting levels rather than enabling shared decision-making or partnership in plan development. Finally, the voluntary publication of the Report on Public Hearing on the local self-government unit’s website, beyond legal requirements, constitutes an additional measure of transparency.

4. Discussion

This paper has examined participatory planning practice in Ireland and Serbia through comparative analysis of legislative frameworks and case studies of both higher-tier plans (the county development plan in Ireland and the municipal spatial plan in Serbia) and lower-tier plans (the local area plan in Ireland and the general regulation plan in Serbia). The selection of these two countries enables examination of how participatory mechanisms operate within distinct institutional contexts: Ireland’s established discretionary planning system shaped by EU integration and democratic traditions, and Serbia’s post-socialist transition system characterised by evolving legislative frameworks and emerging participatory cultures. The analysis reveals significant differences across multiple dimensions of participatory practice, from institutional arrangements to the treatment of public input.

Institutional frameworks and legislative approaches. The two systems exhibit fundamentally different approaches to planning legislation and institutional organisation. Ireland’s planning framework is consolidated within a single comprehensive statute – the 2024 Planning and Development Act (Government of Ireland, 2024) – providing unified provisions for both plan-making and development management. This consolidation, combined with complementary guidance documents such as the Development Plans Guidelines for Planning Authorities (DHPLG, 2022) and the Guide for Inclusive Community Engagement (DRCD, 2023), creates a stable institutional environment that encourages local authorities to supplement statutory requirements with innovative participatory methods.

Serbia’s legislative framework has undergone multiple revisions since 2003, reflecting the country’s ongoing transition from technocratic planning traditions toward participatory governance

models aligned with European integration goals. The introduction of early public insight in 2014 and recent policy frameworks addressing public participation (2018-2023) demonstrate evolving commitments to participatory planning. However, Serbian planning operates primarily on principles of legal conformance rather than performance-based evaluation, resulting in persistent gaps between formal participatory requirements and actual practice. The presence of a Planning Commission, composed of experts with one-third nominated by the national ministry, introduces multi-level governance oversight absent in the Irish system, where elected councillors exercise primary decision-making authority.

Information dissemination and accessibility. The depth and diversity of informing mechanisms differ substantially between the two systems. Irish planning authorities employ immersive, multi-channel communication strategies extending far beyond statutory requirements. Case studies demonstrate extensive use of printed materials delivered to households, dedicated plan websites and consultation portals, social media campaigns across multiple platforms, webinars with recordings, podcasts, virtual consultation rooms, and physical exhibitions. The Fingal County Development Plan exemplifies this approach through its comprehensive digital and analogue information strategy designed to reach diverse demographic groups.

Serbian informing practices remain largely limited to statutory notices published in daily newspapers and physical display of plan drafts in municipal buildings or on local municipality websites. While meeting formal legal requirements, these mechanisms provide minimal accessibility compared to Irish multi-channel approaches, potentially limiting awareness and engagement among citizens with varying information access patterns.

Consultation mechanisms and dialogue quality. Both systems establish consultation mechanisms, but their format and deliberative quality differ markedly. Irish consultation combines statutory written submissions with non-statutory mechanisms designed to facilitate two-way communication. Public drop-in sessions, information days, and webinars enable direct interaction between planners and citizens, creating opportunities for clarification and dialogue. Themed submission portals allow structured feedback on specific planning topics. Ireland's electoral system, where local councillors often have strong connections to community organisations and civil society (Weeks & Quinlivan, 2009; Quinlivan et al., 2022), creates additional channels for community influence on planning decisions.

Serbian consultation operates primarily through formal public inquiry procedures, in which plans are presented, and objections are submitted in writing. A distinctive feature is the public session at which submitted objections are examined – a mechanism with no direct equivalent in Irish practice. This session provides a procedural opportunity for citizens to supplement and clarify their objections and to hear responses from professional planners, although final decisions are made in closed sessions among planning authorities. The Palilula case demonstrates emerging institutional responsiveness: the Planning Commission required repeated public hearings after accepting objections, suggesting evolving consultation practices despite formal constraints. However, interaction remains largely asynchronous and formal, with limited simultaneous communication between planners and the public. Irish consultation practices align more closely with feedback-oriented dialogue, while Serbian consultation remains procedurally focused with objection-based framing.

Collaborative practices and non-statutory participation. The most pronounced difference appears at the collaboration level. Irish planning demonstrates structured experimentation with collaborative methods, though these remain non-statutory. Examples include workshops with elected members, targeted engagement with prescribed bodies, and innovative youth engagement tools such as the Minecraft event in Fingal's plan-making process, where young people co-designed solutions for the Rogerstown Estuary area. Irish planning authorities actively supplement statutory requirements, guided by national policy frameworks encouraging innovative participatory methods without requiring legislative change.

Collaboration during Serbian planning processes appears occasionally and might include public or private sector participation in rare cases, but remains exceptional and dependent on institutional discretion rather than systematic practice. Non-statutory participation mechanisms are largely absent, and planning practice is tightly constrained by legal minimums. Where non-statutory methods occur, such as public presentations at the sub-municipal level, stakeholder meetings, or citizen guidance on submitting objections, they are regarded as exceptions rather than standard practice (Čolić et al., 2013; Milovanović Rodić, 2024).

Treatment of public input and transparency. Both systems record public submissions but differ fundamentally in how input is processed, addressed, and communicated. Irish processes publish all submissions online and systematically address them in the Chief Executive's Reports, i.e., comprehensive documents providing transparency and traceability between public input and planning decisions. These reports categorise submissions thematically, provide detailed responses with policy or technical justifications, and explicitly state whether recommendations will modify the plan.

Serbian Reports on Public Hearings include detailed statistics on accepted, partially accepted, rejected, and irrelevant objections, and set out the statutory requirements for explaining rejected or irrelevant objections. Although publicly available, these reports are not always readily accessible. Cases examined show acceptance rates ranging from 53% (Surčin) to substantial majorities (86% in the first procedure in Palilula, 89% in the repeated procedure), indicating meaningful incorporation of public feedback through consultation processes. Nevertheless, Irish processes emphasise procedural transparency throughout the participation cycle, whereas Serbian processes focus on the formal resolution of objections, thereby reinforcing an adversarial framing of participation.

These comparative findings reveal that participatory planning operates differently across institutional contexts shaped by distinct planning traditions, legislative frameworks, and democratic cultures. Ireland's discretionary system enables the flexible adaptation of participatory practices beyond statutory minimums, supported by policy guidance that encourages innovation and experimentation. Serbia's post-socialist transition context demonstrates evolving commitments to participation through legislative reform, yet implementation remains constrained by legacies of technocratic planning and conformance-based institutional cultures. Both systems face ongoing challenges in moving beyond consultation toward genuine collaboration, though they approach these challenges through different institutional pathways shaped by their respective governance contexts.

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