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## 5. Comparing territorial governance

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### 5.1 INTRODUCTION

Cross-national comparisons of spatial planning have long been of interest to planning academics and practitioners. Increasingly ambitious studies comparing large numbers of European countries have been completed since the 1980s. The motivation has been to borrow ideas and good practices, inspire innovation, benchmark performance, and to learn about the nature of planning (see also Chapter 6).

Europe has a rich store of cross-national comparisons of planning. European Union (EU) institutions have a strong interest in facilitating learning on domestic planning, and they have the resources to support academic and practice-based research projects. EU project funding has allowed many thousands of practitioners to learn about planning in other member states and to compare it with their own practices. As the number of cross-national comparative projects has grown, so too has experience in methods of making comparisons. Methods have evolved, and arguably, so too has the quality of comparisons and competence of researchers.

Comparisons cover the whole spectrum of urban and regional planning, spatial planning, and territorial governance. The many forms of urban, regional, and land use planning have since the 1980s come under the umbrella term, spatial planning. However, the term spatial planning also indicates the EU institutions' specific interest in planning's role in coordinating the territorial impacts of sectoral policies. From the 2000s, the EU has tended to use territorial governance (Stead, 2014), for this form of planning, especially after its use in the *EU 2007 Territorial Agenda* (MUDTCEU, 2007). Schmitt et al. (2016, p. 7) explain that territorial governance is about cultivating a 'place-based, territorially sensitive and integrated approach to policies [...] and creating synergies between different types of policy interventions'. For the EU, the term territorial governance has been a convenient proxy for the term spatial planning because it puts some distance between the competences of member states over spatial planning (land use regulation) and the interests of the EU (cross-sectoral coordination) (Nadin et al., 2024a). Debate in the EU in the 2020s is using again the term spatial planning (MSPTD, 2020). For the purposes of this chapter, we use the term spatial planning interchangeably with territorial governance.

The chapter is divided into three parts, beginning with a brief overview of major cross-national comparative research projects, drawing on literature spanning almost 50 years. The chapter then examines three methodological challenges that are important for cross-national comparative research: (i) the problem of conceptual equivalence across countries and cultures; (ii) the need to address the dynamic nature of planning systems as they evolve over time; and (iii) the comparison of both formal and informal institutional components of planning systems and practices. The third part of the chapter concerns the main dimensions that have been employed (or could potentially be employed) to compare territorial governance between or within countries. The third part concerns the dimensions of comparison of spatial planning:

the way planning is organised, characteristics of the operation of planning in practice, and the actual impact of planning policy on territorial development.

## 5.2 HISTORY OF CROSS-NATIONAL COMPARATIVE RESEARCH ON PLANNING IN EUROPE

Systematic large-scale cross-national comparison of planning systems began in the 1980s, although some general reviews from before this time can be found (e.g. Bunbury 1938).<sup>1</sup> There are also important reviews of the origins of modern town planning that consider its comparative evolution in several European countries. Thomas Adams, who was instrumental in creating town planning professional bodies in the United Kingdom (UK), Canada, and the United States (US), includes notes on ‘other countries’ in his 1932 book, *Recent Advances in Town Planning*. Since then, there have been many comparative planning studies in Europe, most of which consider a single aspect of planning or look at whole systems in a small number of neighbouring countries. We concentrate here on the major studies that have made comprehensive comparisons in several countries.

Table 5.1 gives a summary of key major cross-national comparisons of European planning systems since the 1980s. Two interconnected points are immediately apparent: the EU institutions have played a critical role in funding projects, and from the mid-2000s, the number of countries compared has increased to include central and eastern Europe.

The study by Davies et al. (1989) was sponsored by the UK government and primarily involved a detailed comparison of the role of plans in regulating development in five countries: Denmark, England, France, the Netherlands, and West Germany.<sup>2</sup> The UK government at that time followed a strongly liberal economic political ideology and wished to ‘explore the possibility of replacing the British discretionary approach to determining whether a development proposal should go ahead, with a zoning approach which would give [...] legal rights to develop without the need to apply for planning permission’ (Healey, 1990, p. 363). The study sought inspiration from countries with zoning systems because it believed these provided more certainty. Davies and his colleagues did indeed find a contrast between the fundamentally discretionary nature of the English system, arising from a tradition of common law where decisions are made on submitted proposals, and the binding nature of zoning plans elsewhere in north-west Europe, arising from a tradition of civil law where plans make decisions ‘in advance’ of proposals. However, whilst the continental European planning systems were considered to offer more certainty, they did not offer advantages for development interests.

The study on *Urban Planning in Europe* (Newman and Thornley, 1996) is largely remembered for its fivefold classification of planning systems based on the legal families of Zweigert and Kötz (1998), a conceptual framing that has been used by many other studies. The formal framework of law and instruments is a necessary part of most studies, although it may be a weak explanation of actual practices. However, both Davies et al. (1989) and Newman and Thornley (1996) also use detailed case studies to explain actual practices and trends in the countries concerned.

EU institutions played an important role in sponsoring studies from the 1990s. The initial impetus for collaborative work on spatial planning at the European level came from the Council of Europe and its Conference of European Ministers of Spatial and Regional Planning (CEMAT). CEMAT undertook small-scale comparative projects such as the *Spatial*

**Table 5.1** *Chronology of large cross-national comparative studies in Europe*

Study	Authors	Countries included	Classifications of planning systems
Planning Control in Western Europe	Davies et al. (1989)	DK, UK(England), FR, NL, DE	Common law Napoleonic codes
Urban Planning Control in Western Europe	Newman & Thornley (1996)	UK, IR, FR, LU, NL, IT, PT, BE, EL, DE, AT, CH, DK, SE, NO, FI + 'Eastern Europe'	Nordic British Germanic Napoleonic East European
EU Compendium of Spatial Planning Systems and Policies	European Commission (CEC, 1997)	EU15 (1995) + NO	Comprehensive integrated Land use management Regional economic Urbanism
National-level Planning in Democratic Countries	Alterman (2001)	DK, DE, FR, IR, SE, NL, UK (IL, JP)	No classification proposed
ESPON Governance of Territorial and Urban Policies	Farinós Dasí (2006)	EU25 (2004) + NO, CH	Comprehensive integrated Land use management Regional economic Urbanism tradition
ESPON TANGO: Territorial Approaches for New Governance	Schmitt et al. (2013)	EU28 + CH, IS, NO, AL, BA, MK, ME, RS & XK (in regional clusters)	6 country clusters based on Worldwide Governance Indicators
Spatial Planning Systems and Practices	Reimer et al. (2014)	BE (Flanders), CZ, DE, DK, EL, FI, FR, IT, NL, TR, PL, UK	No classification proposed
OECD reports on The Governance of Land Use	OECD (2017a, 2017b)	AT, BE, CZ, DK, EE, FI, FR, DE, EL, HU, IR, IT, NL, NO, PL, PT, SK, SL, ES, SE, CH, UK + 10 other OECD countries.	No classification proposed
ESPON COMPASS: Comparative Analysis of Territorial Governance and Spatial Planning Systems	Nadin et al. (2018)	EU28 + CH, IS, LI, NO (summary reviews of AL, BA, MK, ME, RS, TR & XK)	No classification proposed

*Source:* Authors, drawing on Nadin et al. (2024b); Nadin and Stead (2013).

*Development Glossary* (CEMAT, 2007). More important is the way that CEMAT raised awareness of spatial planning at the European scale, which led to the injection of the spatial dimension of policy into the EU institutions (Faludi, 2010). A confident and well-resourced European Commission facilitated intergovernmental cooperation, and seminal work was undertaken on spatial planning, notably the *European Spatial Development Perspective* (ESDP) (CSD, 1999). This motivated the European Commission to learn more about domestic planning systems. It first commissioned a pilot comparative review of Western European planning systems (Kolpron Consultants, 1991), and subsequently the *EU Compendium of Spatial Planning Systems and Policies* (CEC, 1997).

The objective of the study was ‘to provide an authoritative and comparable reference on spatial planning systems and policies ...’ (CEC, 1997, p. 22). The Compendium comprises 16 country volumes (including Norway) and an overview comparative report.<sup>3</sup> Case studies of planning practice were prepared but not published. Each volume covers the national conditions for planning, administration, law; the hierarchy, form, and status of plans and how they are made; the regulation of development, enforcement, and value capture; land policy mechanisms; the thrust of ten planning policy fields; reflection on the systems in operation; and trends.

Nadin and Stead (2013) offer a critical review of the Compendium’s methods. In summary, national consultants prepared a summary of the form and operation of the country’s planning system following a template agreed upon by the whole consortium. Four independent experts reviewed each country submission. The Compendium acknowledges that ‘some compromises had to be made in order to accommodate the many variations and differences that exist’ (CEC, 1997, p. 159). There is also awareness that even a plain description of a ‘system’ will be contested and may be politically sensitive. These are recurring themes in cross-national comparisons.

The Compendium is perhaps most well-known for proposing a typology of four ‘traditions’ of spatial planning: comprehensive integrated; land-use management; regional economic; and urbanism. The ‘traditions’ are ideal types, models of planning against which the reality of planning in any place can be compared. They ‘were never meant to imply that planning systems fit neatly into a single tradition’ (Nadin and Stead, 2013, p. 1551).

The comprehensive integrated ideal-type of spatial planning informed the study on *National Level Planning in Democratic Countries* (Alterman, 2001). The project was led from Israel, motivated by concern about rapid immigration in the early 1990s. The project has a strongly normative objective to ‘create an integrated policy covering land use, infrastructure, economics, environment, water, agriculture, and social policy’ (ibid., p. xi). Although the study only concerns national-level planning, it is relevant because of its wide scope beyond the statutory planning systems, which mirrors the concept of territorial governance. The project covers a broad sample of ten democratic, advanced-economy countries, seven from Europe. The method of comparison was by bringing together critical reviews of national-level planning in each country from invited experts.

The findings indicate a variety of motivations for differing attitudes towards national-level planning. For all the European countries, EU policies ‘served as a trigger for the introduction of some degree of national-level planning or reinforced the utility of existing practices’ (ibid., p. 17). The study concludes positively, noting that in the countries studied, at that time the ‘command-and-control mode of planning making is in demise, whereas the negotiated contractual mode is on the rise’ (ibid., p. 33). With the benefit of hindsight, command-and-control

is certainly on the wane, but indications of effective cross-sectoral policymaking are patchy in the face of neoliberal politics (Nadin et al., 2018; Zonneveld and Nadin, 2021).

The *ESPON Governance of Territorial and Urban Policies* study (Farinós Dasí, 2006) was a hugely ambitious project motivated by the adoption of the concept of territorial governance by the EU. It offered a definition of territorial governance and examined its operation in 29 countries. The main part of this study is concerned with the reform of formal government structures and the distribution of competences, but a substantial Annex examines how countries were experiencing a change in planning styles. The styles are essentially the traditions or ideal-types from the EU Compendium of 1997 but much simplified (see Nadin and Stead, 2013). With the assistance of national experts, the project first extended the styles (or traditions) to all 29 countries and then considered the degree to which each country was moving from one style to another. The overall conclusion in the report (whilst recognising that variety is more common than similarity) is that many countries are converging around a neo-comprehensive integrated planning approach. There has been much attention to convergence or divergence in planning systems in Europe since the 1980s, and most projects are more circumspect in their conclusions (Adams, 2008; Berisha et al., 2021a, 2024; Davies, 1994; Stead, 2013; among others).

The *ESPON TANGO Territorial Approaches for New Governance* project (Schmitt et al., 2013) was also motivated by the increasing interest in the idea of territorial governance. This was not a comprehensive cross-national comparison of territorial governance; rather, it was an investigation using in-depth case studies of ‘the processes by which actors and institutions at different levels formulate and implement policies, programmes and projects to achieve a certain territorial goal’ (ibid., p. 6). The aim was to provide lessons on good territorial governance. To this end, it collected experiences of territorial governance from across Europe to consider the similarities or difference in member state approaches. It defined and compared dimensions of territorial governance: the coordination of actors, integration of sectoral policies, mobilisation of stakeholders, adaptation to changing conditions, and recognising the specifics of space and place in governance.

The case studies include policymaking conditions at different scales and for a variety of policy challenges. From the conceptual and empirical work, the project identified similarities in promoters and inhibitors of ‘good’ territorial governance and concluded with guidance to governments about the most profitable ways to promote and strengthen its practice (Schmitt and Van Well, 2015).

A very different approach was taken by the project sponsored by the German Academy for Territorial Development in the Leibniz Association (ARL) project on *Spatial Planning Systems and Practices* (Reimer et al., 2014). The primary objective of the project was ‘to delineate the coexistence of continuity and of convergence and divergence’ (ibid., p. xvi) of planning systems over 20 years. The project covered 12 countries and involved a series of in-depth workshops where a common conceptual framework and reporting structure were agreed upon, and provisional findings were discussed and compared. The findings provide a snapshot of each country but concentrate on five dimensions of reform, the reasons for change, and their driving forces: scope and objectives, tools, scales, actors, and planning styles. The in-depth reviews of each country concentrate more on answering the research questions on change rather than descriptions of systems. In summary, at that time the report found the scope of systems had widened; there was a tendency towards the use of instruments that give decision-makers more discretion; cross-boundary working was more often practised in

functional planning regions; more actors were involved in planning representing a wide range of sectoral interests; and reforms to planning systems overall added up to a shift from command and control to more indicative approaches.

The findings and lessons on method from the projects discussed so far were taken forward into the design of *ESPON COMPASS: Comparative Analysis of Territorial Governance and Spatial Planning Systems in Europe* (Nadin et al., 2018, 2024b). The main objective of the project was again to examine change in planning systems, with an emphasis on the influence of the EU on reform and particularly its cohesion policy. The investigation paid special attention to the design of planning systems to coordinate the spatial impacts of sectoral policies, as advocated initially in the ESDP. Thus, the start date was set at 2000. This also was around the time of major EU enlargement to central and eastern Europe, Cyprus, and Malta, countries experiencing rapid change in territorial governance. The project covered the existing and new EU member states and the four EFTA countries. A ‘light’ review of seven countries in the Balkans was also included (Berisha et al., 2021b, 2024). The project did not produce country volumes like the 1997 EU Compendium, but information on countries was compiled into supplementary volumes.

The breadth and depth of cross-national comparative research on spatial planning is not represented by this brief history of major studies. First, there are other extensive studies of planning systems that provide compilations of data on countries but much less comparison. Foremost among these are the 2017 studies sponsored by the OECD, based on the examination of 32 countries, 22 in Europe. One volume (OECD, 2017a) offers policy recommendations such as the need for more flexibility and integration in systems with a summary of seven case studies, five in Europe. A second volume (OECD, 2017b) provides fact sheets prepared by academic experts on each country. The reports are valuable, not least for the emphasis on tax and other policies that impact land use, but there is little comparison of systems. The ISOCARP Manual of Planning Practice gives the most comprehensive coverage of Europe with 48 one-page country profiles, but again with little comparison.<sup>4</sup>

### 5.3 THREE METHODOLOGICAL CHALLENGES

Many authors have considered the challenges of conducting research across countries and cultures and offered recommendations for addressing them (e.g. Booth, 2011; Hantrais, 2009; Masser, 1986; Nadin and Stead, 2013; Sykes and Dembski, 2019; Williams, 1984). There are claims that there is a lack of reflection on methodology or even a willingness to explain it (Krehl and Weck, 2019). We do not recognise this as a general characteristic in the studies discussed here. The issue is more a case of how to measure the rigour of cross-national research. As such, cross-national comparative research needs to ensure accuracy and consistency in measurement, present credible and dependable findings, and provide meaningful conclusions and recommendations. For findings to be credible and dependable, the overall conceptual framework needs to be well-founded, the research design needs to incorporate quality control and triangulation, and reflection on the core challenges of cross-national research needs to be included.

In this section, we review three core challenges in doing cross-national comparative research on spatial planning: (i) the lack of equivalence in the meaning of concepts in different places and languages; (ii) the evolution of spatial planning systems in different places at

varying speeds and in different directions; and (iii) uncovering the actual practices of planning beyond the formal description of systems.

### **5.3.1 Conceptual Equivalence**

In the natural sciences, there is a high degree of concurrence in the understanding of concepts being studied in places often very distant from one another. In the social sciences, there is more contestation of the meaning of concepts, which do not travel well between countries (Hantrais, 2009; Healey, 2011). Alternative meanings are multiplied dramatically in cross-national research. Dühr et al. (2010, p. 22) make the evident point that ‘very few terms used in spatial planning have a universal objective meaning’; instead, they are ‘deeply bound up with their context, especially the history of a society and its language’. Therefore, it is not possible to take for granted the equivalence of meaning of words, even core concepts like ‘plan’.

This variation in the meaning of concepts is the very essence of cross-national comparative research. The objective is, in part, to reveal varying meanings in different places rather than assume they are the same. However, acceptance of a relativist position where each place has its own meaning undermines comparison. Conversely, ignoring the cultural rootedness of planning – and the meaning of words we use to describe it – can lead to the unwitting imposition of the meaning of terms from one place. As the research lingua franca is English, it is often the Anglo-American meaning that dominates (Kunzmann, 2004; Haselberger, 2015).

A midway point is needed in comparative research that recognises the social construction of meanings in place but that uses functionally equivalent terms. This, in turn, requires a concerted effort from researchers to share and agree on the framework of concepts, translating to closely comparable (home language) terms (Mangen, 1999). The measurement of those concepts is also open to misinterpretation. For example, how can ‘centralization’ be measured in equivalent ways? When is a planning instrument adaptable? The criteria used in the measurement of variables should be theoretically informed and set out unambiguously. Close supervision and feedback are needed to ensure that measures are being applied consistently. Overall, meeting the challenge of conceptual equivalence or lack of it requires considerable collaboration among researchers.

### **5.3.2 Capturing the Dynamics of Spatial Planning Systems**

A criticism of cross-national comparative research is that it gives insufficient attention to the ways in which planning systems change over time and what factors or interests have power in influencing change (Getimis, 2012; Nadin, 2012; Reimer et al., 2014). For research methods, this is known as a diachronic method in contrast to the synchronic method, which takes a snapshot at one point in time.

Reform in planning systems is ever-present for good reason. In Europe, hopes of more political and socioeconomic stability following the collapse of the Cold War have been dashed in the wake of a succession of critical events disrupting government policies. Notable among these are the 2007–2008 financial crisis and subsequent austerity measures, the Coronavirus pandemic, the Ukraine War and its impacts on the energy transition, and the increasing flow of asylum seekers. Underlying these events are ascendant neoliberal and populist ideologies, the critical need to tackle the risks of climate change, and the consistent influence of the EU.

In the face of this ‘polycrisis’ (WEF, 2023), governments are reforming policy, including that for urban and regional development and planning, sometimes radically.

Many planning systems were reformed in the early 1990s (some now reversed), notably in central and eastern Europe. Other countries experienced major shifts in the 2010s after the financial crisis (Tulumello et al., 2020). For Europe as a whole, it is difficult to compare and synthesise change, especially for the large-scale studies. The reforms have different starting points and go in different directions and speeds. The reasons for change are not always apparent. Cross-national comparative research can contribute to understanding the exercise of power in planning reforms and whose interests it serves. The studies by Reimer et al. (2014) and Nadin et al. (2018) focus on significant changes to planning systems over time, the first from around 1990, the second from 2000. Their conclusions are described as ‘multiple trends of continuity and change’ (Getimis et al., 2014) or ‘multiple trajectories’ (Nadin and Fernández-Maldonado, 2023), but with generally increasing involvement and interaction among a wider range of actors; more adaptable planning instruments; and a strong tendency towards more meaningful involvement of citizens.

Investigation of the dynamics of planning systems inevitably leads to questions of whether approaches in European countries are converging or diverging. Is there a Europeanisation of planning (Cotella, 2020; Cotella and Dąbrowski, 2021; see also Chapter 19)? This deceptively simple question is very difficult to investigate in practice. In the 1990s, there were claims of convergence (Healey and Williams, 1993). However, there is also divergence as global forces have differing effects on countries (the 2007 financial crisis is a case in point), and they come up against the prevailing social model, local professional cultures, and the inertia of path dependence (Stead, 2013; Purkarthofer, 2018), all of which should be examined in comparative studies.

### **5.3.3 Formal Systems and Informal Practices**

In much of the cross-national comparative research on spatial planning, there is a strong emphasis on describing the form of law, government structures, and the hierarchy of planning authorities and plans (Reimer et al., 2014). However, ‘a focus on formal description may hide as much as it reveals, particularly in relation to the real distribution of power and influence in the system’ (Nadin, 2012, p. 3). Moreover, planning systems comprise both the formal institutions of law and instruments, and the informal institutions of social norms, shared meanings, and unwritten agreements that shape actual practices. Formal institutions are relatively easy to investigate because they are codified and plainly visible. They can be readily compared. Informal aspects are more difficult to measure and compare, especially the intangible shared norms and beliefs, and so are more challenging but no less important.

Formal and informal institutions complement each other since they evolve through interaction (Van Assche et al., 2014). Formal institutions grow out of the informal, and informal institutions may emerge to circumvent the formal when it is seen as an obstacle. Münter and Reimer (2023) explain how in Germany, the deeply entrenched formal sphere has been bypassed by the creation of new arenas of discourse and informal planning practices because of the inflexibility of the formal mechanisms to respond to new demands. Conversely, embedded ways of understanding and working (informal institutions) may thwart innovation in the formal framework (Follador et al., 2022). Ideally, cross-national comparison will examine both the formal and informal and their interaction. ‘Understanding the evolution of planning

systems, the effects of plans, planning policies and laws, and the transformation options of planning systems hinges on an understanding of the formal/informal dialectics in the various contexts of spatial planning' (Van Assche et al., 2014, p. 675). Combining the study of the formal and informal is a priority for future research because their interaction is indispensable for the emergence of what the editors call the 'new forms of spatial coordination and co-management' that are critical for the operation of territorial governance.

## 5.4 DIMENSIONS OF COMPARISON

In 2013, we noted that in many comparative studies of spatial planning, there has been little reflection on the criteria being used to define the 'planning system' and what aspects of planning are being measured (Nadin and Stead, 2013). While the situation may now have changed to some degree, to the point of attempting to define the 'nature' of a planning system (Janin Rivolin, 2012), we are still of the opinion that more attention could be given to these aspects. A range of different dimensions (indicators) are available to compare spatial planning systems. In addition, a range of other dimensions could potentially be employed to compare spatial planning systems but have not been used to date as far as we are aware. These dimensions of comparison can broadly be categorised into three main types: (i) those which influence the way spatial planning is organised; (ii) those which describe the main characteristics of the operation of spatial planning in practice; and (iii) those which highlight the impact of spatial planning on territorial development. Several dimensions can be identified under each of these three main types (Table 5.2). For example, dimensions such as the legal and constitutional arrangements and societal values can all potentially affect the ways in which planning is organised or structured. Our view is that a clearer distinction could be made between these three dimensions in comparative research, and that attention to all three dimensions is necessary to give a full picture of a spatial planning system.

### 5.4.1 Dimensions which Influence the Way Spatial Planning is Organised

*Legal and constitutional arrangements* can influence the way in which governments exercise authority over land, especially where constitutional rights grant individuals certain freedoms to build on their land or change the use of their property (Nadin et al., 2018). A few studies have considered how spatial planning differs between countries with distinctive legal and constitutional arrangements. For example, Davies et al. (1989) contrasted the legal certainty provided by systems in continental Europe (based on the Napoleonic or Scandinavian legal systems) with the high degree of administrative discretion in the English system as a consequence of common law. Similarly, Newman and Thornley (1996) sought to identify factors influencing the variation in planning systems across Europe, starting with an investigation into the role of different legal styles.

*Societal values and norms* can directly influence the objectives and practices of spatial planning, and these can lead to different conceptions about the roles of the state, the market, and citizens in decision-making (Nadin and Stead, 2008). They can also lead to different conceptions about the importance of planning, its scope and the resources allocated to it. One of the more tangible ways that societal values and norms can affect spatial planning is the relative roles and powers of the public and private sectors in planning and development processes.

Table 5.2 *Dimensions for comparing spatial planning systems*

Dimension type	Sub-type	Examples	References
Dimensions which influence the way spatial planning is organised	1a. Legal and constitutional arrangements	Constitutions can specify the duties of public authorities, landowners, and developers in relation to issues of public participation.	Davies et al. (1989) Newman and Thornley (1996) Nadin et al. (2018)
	1b. Societal values and norms	Societal values and norms influence conceptions about the importance of spatial planning, its scope and the resources allocated to it.	Nadin and Stead (2008) Knieling and Othengrafen (2009)
	1c. Others	Overall levels of wealth, demographic change, industrial activity, topography, and scarcity of land can all influence how important spatial planning is considered, and the resources allocated to it.	-
Dimensions which describe the main characteristics of the operation of spatial planning in practice	2a. The extent to which plans are binding	More binding systems provide more certainty for residents or investors but require up-to-date detailed plans to guide decisions, while discretionary systems provide less certainty but are more flexible and allow planning decisions to respond more quickly to changing circumstances.	OECD (2017a and 2017b) Nadin et al. (2018)
	2b. The function of plans	Plans can range from wide-scale, long-term, agenda-setting documents to small-scale, detailed, short-term zoning ordinances.	Nadin et al. (2018)
	2c. Planning policy instruments	As well as regulatory policy instruments, spatial planning also draws upon instruments of nodality (i.e. information-based tools), treasure (i.e. fiscal tools) and organisation (i.e. direct action by government).	Stead (2021)
	2d. The scope of planning	This refers to the range of policy issues or topics over which the planning system has some competence or influence, and the extent of integration between spatial planning and other policy sectors.	Nadin et al. (2018)

Dimension type	Sub-type	Examples	References
-	2e. Policy coordination arrangements in planning	Plan-making processes typically involve ensuring consistency and coordination between different plans, different policy sectors, and different levels of government, which involve both horizontal and vertical aspects of coordination.	Nadin et al. (2018) Stead et al. (2004)
-	2f. Others	The calibration of policy instruments (i.e. their severity, where and when they apply, and to whom).	Stead (2021)
Dimensions which highlight the impact of spatial planning on territorial development	3a. The influence of plans on territorial development	Assessing the influence of plans on practice (e.g. new development patterns) is complex since this is not only related to the power of planning but also to factors such as economic and social dynamics which influence the demand for development.	Nadin et al. (2018)
-	3b. Influences on local and national planning discourses beyond their own territory	Spatial planning policies and practices in one jurisdiction can influence those in another. International spatial planning discourses can influence national and local ones, while national and local discourses can influence international ones.	Nadin et al. (2018)

*Source:* Authors' own elaboration.

This has implications for the extent to which spatial planning policy is reliant on public or private sources, and the extent to which development might be characterised as predominantly plan-led or market-led.

*Other dimensions which influence the way planning is organised* include socioeconomic, demographic, and territorial factors. For example, overall levels of wealth, demographic change, industrial activity, topography, and scarcity of land can all influence how important planning is considered for a particular territory, the amount of attention given to certain sectors in planning, and the overall resources made available for developing and implementing plans. To date, however, most of these factors have received relatively little attention in comparative studies of spatial planning.

#### 5.4.2 Dimensions which Describe the Main Characteristics of the Operation of Spatial Planning in Practice

*The extent to which plans are binding* is often linked to constitutional and legal arrangements (see above). More binding systems generally place more emphasis on detailed land use plans in reaching planning decisions, whereas more discretionary systems give more emphasis to providing more general guidance. The operation of more binding systems provides more certainty for residents or investors but relies on up-to-date detailed plans to guide decisions. Discretionary systems, on the other hand, provide less certainty but are more flexible and allow planning decisions to respond more quickly to changing circumstances (OECD, 2017a).

*The function of plans* has been considered in comparisons of planning systems as a way of distinguishing between different approaches (e.g. Nadin et al., 2018; CEC, 1997; OECD, 2017a).<sup>5</sup> Categorizations like this illustrate the range and hierarchy of plans that can be used, often in combination with each other, although not all of them are used in every spatial planning system.

*Planning policy instruments* (sometimes called tools or measures) are mentioned in several comparative studies of planning, but most of them in reality refer to different types and functions of plans (as outlined above). In fact, very little attention has been given to planning policy instruments in comparative studies of spatial planning (Van den Broeck, 2008; Stead, 2021). Planning policy instruments extend well beyond regulation alone, even though regulation is a key type of instrument. As well as regulatory policy instruments, spatial planning also draws upon instruments of nodality (i.e. information-based tools), treasure (i.e. fiscal tools), and organisation (i.e. direct action by government).

*The scope of planning* refers to the range of policy issues or topics over which the planning system has some competence or influence, and the extent of integration between spatial planning and other policy sectors (Nadin et al., 2018). As recognised above, the scope of planning may be influenced by legal and constitutional arrangements and/or societal values and norms. These can fundamentally affect the extent to which certain issues and policy sectors are included in spatial planning processes.

*Policy coordination arrangements* in planning typically involve ensuring consistency and coordination between different plans, policy sectors, and levels of government, which involve both horizontal and vertical aspects of coordination (Stead et al., 2004). Arrangements for horizontal and vertical coordination frequently involve policy instruments for promoting stakeholder involvement and engagement in planning (see above), but these are not the only means to achieve coordination: other formal and informal procedures exist.

*Other dimensions which describe the main characteristics of the operation of planning in practice* include criteria such as the calibration of policy instruments, which essentially refers to its severity, where and when it applies, and to whom (Stead, 2021). Whenever or wherever a planning policy instrument is employed, the role of calibration is crucial for its effect. The calibration of policy instruments can address specific parts of the population and affect the distribution of burdens and benefits to different social groups with subsequent implications for spatial development decisions.

### 5.4.3 Dimensions which Illustrate the Impact of Spatial Planning

*The influence of plans on physical development* is highly variable (see e.g. Nadin et al., 2018). However, assessing the influence of plans on practice (i.e. new development) is complex since this is not only related to the power of planning but is also related to factors such as economic and social dynamics which influence the demand for development. Consequently, any lack of conformity between the content of a plan and the planning decisions taken does not necessarily indicate a lack of implementation or enforcement: the plan's objectives may still have been achieved, and the plan's influence may still have been significant in development decisions (CEC, 1997).

*Influences on local and national planning discourses beyond their own territory* can also illustrate the impact of planning. International spatial planning discourses can influence national and local ones, but at the same time, national and local discourses can influence international ones. In addition, spatial planning policies and practices in one jurisdiction can influence those in another. These multidirectional policy influences are reflected in the academic literature on Europeanisation (Dühr et al., 2007). Nadin et al. (2018) identified examples where domestic spatial planning policies and practices have influenced EU-level debates.

## 5.6 SUMMARY AND CONCLUSIONS

There is a long history of cross-national comparative research on territorial governance and spatial planning in Europe. European integration and concerns about the place-based effects of sectoral policies have led EU institutions and governments to sponsor many studies, both large and small. The scale and ambition of the larger cross-national studies have grown, as has awareness of the pitfalls of comparative study and the need for rigorous research design and methods to ensure trustworthy findings. Despite some criticism of the lack of reflection on methods, study reports are generally explicit about their methodological strengths and weaknesses, as well as the practical and conceptual difficulties of comparing planning across countries and cultures.

All studies understandably struggle with three key challenges for cross-national comparative research: making worthwhile comparisons when the meaning of planning is embedded in local language and culture; tracing the complex evolution of planning over time and its causes; and revealing both formal and informal aspects of planning and their interaction. Above all, the cross-national comparisons briefly introduced here are coarse-grained, generalising about 'systems' that may, in practice, lack coherence and will certainly vary in operation within each country.

Although the formal framework of law and instruments has been a starting point for most studies, all the major studies have complemented this with more detailed case study investigations of the operation of planning, and to some extent addressed the three challenges. The studies involving more countries have also produced classifications of systems that explain or describe the essential differences between systems, and which have been taken forward extensively for more detailed study in other comparative projects. The in-depth studies understandably show that the broad classifications can hide as much as they reveal.

Attention to three distinct dimensions of spatial planning can provide a fuller picture of spatial planning systems in comparative studies: (i) those which influence the way spatial

planning is organised; (ii) those which describe the main characteristics of the operation of spatial planning in practice; and (iii) those which highlight the impact of spatial planning on territorial development. A clearer distinction between these three dimensions could be made in future comparative research.

## NOTES

1. Healey (2013) goes back to the time of the Roman Empire to illustrate the long history of cross-national comparisons and borrowing of ideas.
2. The UK government was and is the competent authority for the planning system in England.
3. A volume for Switzerland was drafted after the Compendium project following a similar template.
4. Nadin et al. (2024b) provides a longer list of compilations of planning systems.
5. The ESPON COMPASS report differentiates between four main functions that plans can play in spatial planning, beginning with more broad-brush, wider-scale plans and ending with more detailed, smaller-scale plans (Nadin et al., 2018):
  - i) Visionary plans which set out a normative agenda of principles or goals for a desirable future
  - ii) Strategic plans that provide an evidence-based, integrated, long-term frame of reference for coordinated action and decision-making across jurisdictions and sectors
  - iii) Framework plans establish policies, proposals, and other criteria for a territory that provide a non-binding reference for other plans and decision-making
  - iv) Regulative plans that make legally binding commitments or decisions concerning land use change and development.

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