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Cross-national comparison of spatial planning systems

A review of experience in Europe

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2. Cross-national comparison of spatial planning systems: a review of experience in Europe

Vincent Nadin, Giancarlo Cotella and Peter Schmitt

INTRODUCTION

Cross-national comparative research on social phenomena faces many conceptual and practical difficulties in ensuring rigorous analysis and trustworthy findings. The questions raised in Chapter 1 about the potential of spatial planning to address challenges such as the effects of climate change, ecological degradation, and gross socio-economic and health inequalities are especially difficult to investigate. The influence of planning is not just determined by its formal structure but is also constrained by the distribution of power and influence, the state of governance, and the stickiness of professional and political cultures. The difficulties of investigating these factors are multiplied where the research travels across countries. However, the challenge should not deter us from comparing, but rather it steers us towards paying careful attention to research design, the meaning of our key concepts, and the methods for collecting and analysing data.

This chapter deepens the discussion of the concept of spatial planning, concentrating on the methodological issues of cross-national research, drawing on more than 50 years of reflection on the comparative method in planning studies (Williams, 1984; Masser and Williams, 1986; Janin Rivolin, 2012; Nadin, 2012; Nadin and Stead, 2013; Sykes and Dembski, 2019; D'hondt et al., 2020; Van Assche et al., 2020; among others). We review the approach of major cross-national research projects on European spatial planning including the most recent work of the ESPON (European Observation Network for Territorial Development and Cohesion) COMPASS (Comparative Analysis of Territorial Governance and Spatial Planning Systems in Europe) projects (Nadin et al., 2018a, 2021b), on which other chapters in the book are substantially based. Chapter 12 returns to the question of comparative methods,

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and the way that typologies have been used to structure analysis and organise findings.

The rest of this chapter is organised around three questions:

- What is being compared?
- What are the methodological challenges in doing research across countries?
- What can we learn from previous cross-national comparative studies on planning?

COMPARING SPATIAL PLANNING ACROSS COUNTRIES

This section brings forward important points for comparative research given in Chapter 1. The generic term 'spatial planning' refers to the collection of instruments that governments use to manage change in the use of land and property. There is much variation across Europe in planning instruments and policies, but also in the very meaning of planning. There are key differences in the ways that planning is understood and practised; for example, some nations take a more imperative command-and-control approach to decision-making, and others a more indicative and inclusive approach.

Despite the different starting positions, there are common trends in the evolution of planning ideas and practices as ideas flow between countries, and as governments respond to the same global and European conditions; but these should not be exaggerated (Healey, 2010; Stead and Cotella, 2011). General shifts include more involvement of private sector actors and decentralisation and self-governance. Sharp divisions remain as the flow of ideas is mediated under local conditions and the prevailing social model and planning cultures (Knieling and Othengrafen, 2009; Nadin and Stead, 2008; Peric Momcilovic and Hoch, 2017; Ward, 1999). Even where similar mechanisms are used, their operation and impact on outcomes in practice will be shaped by the competence, integrity and culture of those involved, and the relative strength of other competing government policies. Spatial planning is a product of the societies in which it exists and is 'place-bound'.

Since the 1990s a European discourse in spatial planning has emerged which, whilst not overlooking the significance of regulating land use change, emphasises the role that planning can play in coordinating the combined territorial impacts of sectoral policies (spatial policy). The territorial cohesion goal of the European Union (EU) — balanced development and fair access to services across Europe — requires careful attention to the territorial or spatial dimension of sectoral policies such as economic development, energy, infrastructure, and others (CSD, 1999; MSPTD, 2020). The objective is to encourage synergy and reduce inconsistency. It requires cooperation between

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sectoral policy actors, governments, private investors and civil society; in other words, territorial governance. Spatial planning plays a central role in territorial governance through, for example, analysis of sectoral spatial frictions, engagement of stakeholders in policy development, and the making of spatial strategies (Schmitt et al., 2013).

Thus, the term 'spatial planning' is used in both a generic way for the collection of planning systems that have varying characteristics, and more specifically to denote place-based sectoral policy coordination. In this book, we use the term 'spatial planning' as an umbrella term to cover forms of planning from the regulation of development and land use change, to the wider concept of territorial governance as shown in Figure 1.1 in Chapter 1. This glimpse of the very different ideas about spatial planning that coexist point to the difficulty in the first task of cross-national research which is to define the object of study in this book.

Investigating how ideas about planning vary through cross-national comparison is theorising about planning. Comparison across countries deepens understanding of planning by highlighting assumptions that are built into planning theory from a domestic perspective, clarifying what it is about planning that is universal and what is contingent on local conditions, and assessing the varying influence of common exogenous forces. For Europe this involves the influence of the EU. In planning practice, comparison meets practical demands for international benchmarking and learning from other places. Systematic cross-national comparison can improve on informal unstructured comparison of planning instruments and policies that is routine in practice.

There are three key points from this brief discussion that are important for cross-national research:

- The notion of spatial planning is historically and culturally rooted; there is no single definition or benchmark of planning against which ideas and practices in any one country can be compared.
- The way that spatial planning is understood and practised in countries evolves, and in different directions.
- Comparisons of spatial planning in Europe must address the consistent though nationally differential influence of the EU.

CONCEPTUAL CHALLENGES FOR CROSS-NATIONAL COMPARISON OF SPATIAL PLANNING

There is a steady stream of commentary on cross-national comparative research in the social sciences, and specifically on spatial planning. In 1984, drawing on previous studies, Dick Williams drew attention to the central problems of comparability and national 'biases'. Many others, before and

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after, have discussed the difficulties of making meaningful and trustworthy cross-national comparisons (Faludi and Hamnett, 1975; Masser, 1984, 1986; Booth, 2011, 2015; Nadin, 2012; Van Assche et al., 2020; and others). They raise a consistent list of issues. Repeated themes are that cross-national comparison, whether undertaken by practitioners or academics or both, include, *inter alia*, that: it is not theoretically informed (Booth, 2011); does not pay sufficient attention to the limitations of lesson-drawing across countries and cultures (Spaans and Louw, 2009); is dominated by Anglo-Saxon conceptual frameworks (Kunzmann, 2004); has an overemphasis on legal-administrative conditions and formal national systems (Reimer et al., 2014); it gives insufficient attention to change over time and especially power relations (Getimis, 2012); it lacks reflection on methodology (Nadin, 2012); and it fails to explain its methodology (Krehl and Weck, 2020).

This review of comparative methods and how they have been applied accepts much of this critique. However, we find that, contrary to the stronger criticisms, most studies do demonstrate a reflective approach to cross-national comparative method and its limitations, at least in those studies that can be properly described as comparative. Nevertheless, the question remains of how a consistent approach can be ensured for large-scale comparative projects that face the huge practical difficulties of working across many systems, cultures and languages.

Cross-national comparative study must aim for consistency and accuracy (or correctness) in the use and measurement of concepts and variables in the analysis. The standard academic criteria are 'validity' (does the study accurately measure the concepts that it purports to?), and 'reliability' (is the measuring consistent at different points of measurement?) (Silverman, 2000). Research projects that draw data on social phenomena from many countries have great difficulty in meeting these formal standards. However, it is important that research findings have credibility and dependability, and can be confirmed by subsequent studies, criteria which Nowell et al. (2017) sum up as trustworthiness. These criteria can be met in cross-national study by quality control of inputs and by triangulation of sources, for example in the way that more detailed case studies using interviews and documentary sources supplement wide-ranging surveys.

However, considerable challenges remain for findings to be meaningful and trustworthy in cross-national comparison of spatial planning, including maintaining conceptual equivalence, recognising the continually evolving nature of planning systems, and accounting for informal planning practices as well as the formal structures.

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Conceptual Equivalence

Trustworthy comparative research requires a convincing theoretically informed framework of concepts, that is, the objects of comparison. The conceptual framework should be applied consistently in different places. The framework is operationalised for comparative study using indicators and variables for measurement. This is a demanding task. Concepts that may help in understanding planning do not travel well between countries. We might use the same words, but we understand different things by them. This is a well-rehearsed problem in cross-national research in the social sciences, where the conceptual equivalence of the objects of study in different places should not be assumed (Hantrais, 2009).

An often-quoted example is Williams's (1996, p. 58) story of the confusion that arose when an English conference speaker was asked a question about the existence of a 'plan' by a German member of the audience. The two talked at cross-purposes, since the meaning of the English 'plan' (essentially guidance for later decisions) is fundamentally different to the German '*Plan*' (sometimes involving binding decisions). In practice, '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' (Dühr et al., 2010, p. 22). Indeed, comparison across borders brings into relief the importance of national and local conditions in explaining what planning means and how it operates in different places. Concepts are socially constructed, thus, 'Concepts are expected to have different meanings in different countries. Relationships are expected to differ more between countries than within a single country' (Przeworski and Teune, 1966, p. 552). It may be acceptable for research within one country to take the meaning of concepts for granted (although even this is questionable). It is certainly not possible when working across borders or cultures; the variable meaning of concepts is part and parcel of the research.

Accepting that important concepts are socially constructed presents a conundrum for cross-national research. On the one hand, the aim for the research is to break from the universalist and 'culture-free approaches' to the social phenomenon of spatial planning, and to reveal the varying understandings of planning in different places. On the other hand, a relativist or culturalist position that emphasises the uniqueness of meanings in different places makes comparison very difficult. This puzzle is resolved in cross-national research through an intermediate 'societal approach' (Hantrais and Mangen, 2007). A societal approach means that researchers accept that comparisons are not 'like with like' in the universalist sense, but that social phenomena (in this case spatial planning) are components of stable systems, and thus careful generalisation is still possible by identifying 'functionally equivalent terms'. Common ground

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on the key concepts in question is achieved by concentrating on functional equivalence, that is, comparing aspects of systems that have broadly the same purpose in different countries or cultures. There is an awareness of the cultural rootedness of planning institutions, and avoidance of an approach that allows a particular cultural understanding to dominate.

Ideally research would adopt a neutral terminology that does not start from the standpoint of one culture. However, there is no such nomenclature in spatial planning, and there is a risk that the adoption of English as the lingua franca may skew meaning towards an Anglo-Saxon perspective (Kunzmann, 2004). Projects that simply pull terms from the British or United States planning lexicon are inviting misinterpretation on matters such as the 'local plan' or 'zoning plan', which have as many meanings as countries. Thus, avoiding bias is difficult.

A pragmatic approach is needed that establishes a framework of concepts and terminology in dialogue amongst researchers that concentrates on functions, and as far as possible avoids national terminology. However, this is no guarantee that terms or questions will be understood in the same way without further mutual effort (Mangen, 1999). Researchers will need not only to share terms and definitions, but also to consider the purpose and function of institutions, for example, as instruments that establish a strategic direction, or institutions that are accountable to the public for planning decisions. Local researchers with language competence and cultural experience can explain or translate to the nearest equivalent terms according to local conditions. It is also good practice in reporting to always use the precise home language term first before using the agreed English language version.

Questions about equivalence extend into evaluation of the concepts or their measurement. For example, research projects will ask about the scope of planning, its 'style', or the degree to which citizens are engaged in decision-making. The comparative measurement scales may be well known for some variables of planning systems, such as the levels of government at which competences rest, but even here there may some difficulty, for example, where there is scope for confusion about what constitutes the 'national level' as in the United Kingdom (UK) or the sub-national/regional level in countries such as Portugal, Italy or Germany where different policy and administrative layers coexist (see Chapter 4). For most dimensions, there will be considerable ambiguity, and here the variables and indicators must be informed by the literature. The example of 'adaptiveness' is given in Chapter 7. In short, adaptiveness relates to the extent to which planning decision-making can respond to changing circumstances in the face of uncertainty. The notion of an adaptive planning system is indefinite, but there is a good base of theory from which to construct measures or categories for evaluation (Nadin et al., 2021a). These problems are reported in Nadin and Stead (2013).

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There are some important general lessons about conceptual equivalence, including the need to adopt a theoretically well-informed but simple conceptual framework for analysis, and to ensure that everyone involved in the project holds a common understanding of the methodology, and the concepts and categories employed.

Shifting Planning Systems

Governments constantly reform aspects of planning in response to political demands, changing circumstances, or to seek improvements in effectiveness or efficiency. Change brought about by reform is a product of a complex mix of factors, primarily reflecting the relative power of political actors as they struggle for influence over decision-making; wider political priorities that favour more or less 'planning'; and awareness of the need for planning methods to change to help tackle pressing concerns such as sustainability and resilience. Planning thought has also played a part in stimulating change alongside learning from front-runner planning authorities, for example in the influence of collaborative planning theory in practice, or the adoption of marine spatial planning approaches.

Generally, planning changes slowly, but there can be dramatic change, as when many European countries transitioned from communism or dictatorships to democracy. The trajectory of change will take twists and turns, thus 'evolution' is perhaps not the most apt description. There was a wave of reform in the 2000s in the context of a lively debate around the European Spatial Development Perspective (Faludi, 2003) and in relation to the EU accession of a number of East and Central European countries in 2004 and 2007 as well as Malta and Cyprus, and then again later in the aftermath of the 2008 financial crisis, in some places reversing earlier reforms (Pallagst and Mercier, 2007; Tulumello et al., 2020). Reflection on comparative methodology by the German Academy for Territorial Development in the Leibniz Association (ARL) concluded that comparative research in Europe gives insufficient attention to change over time (Reimer et al., 2014; see also Nadin, 2012). In his contribution to that work, Getimis (2012) argues for recognition of the fluid nature of planning institutions and that research should adopt a diachronic approach, explaining how planning has changed and is changing in varying ways.

Investigation over time lends insight into questions about the convergence or divergence of planning systems. Are there common general trends, is there more similarity or difference as national and regional systems respond to common forces, for example, in relation to decentralisation or centralisation of competences between levels of government? In Europe, trends in spatial planning are important for assessing the effects of European integration on planning in EU member states, as explained in Chapter 8. Are the impacts

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of EU law and policy, and the many opportunities for cross-national mutual exchange and learning, leading to a Europeanisation of spatial planning (Dühr et al., 2007; Wishlade et al., 2003)?

Research on trends in planning is demanding. In Part III of this book we explain how the ESPON COMPASS projects addressed the multiple influences on planning practices over time resulting from the downloading of European-level law, policy and discourse into domestic planning, the uploading from national and regional levels into the European-level discourse, and mutual institutional learning through cooperation at transnational, inter-regional and cross-border levels (Janin Rivolin and Cotella, 2013) and sharing of good practices (Stead, 2012).

Formal Systems and Informal Practices

The starting point for cross-national comparison is invariably the structure of statutory planning instruments and procedures (required or permitted by the law). This is the formal legal framework of organisations, instruments and procedures that structure planning practice. They are set out in national descriptions of a system, and much investigation can be done by desk-based systematic documentary analysis. Some comparative studies concentrate on this formal apparatus. Kule and Røsnes's study of planning control in Latvia and Norway, is 'strictly limited to the statutory rules that regulate relationships between authorities and players in development' (Kule and Røsnes, 2010, p. 2028), arguing that it is the legal frameworks that decide who can be involved in decision-making. Similarly, Schmidt et al.'s study of the impact of planning on urban development outcomes in Germany and the United States uses the formal 'institutional planning frameworks' (Schmidt et al., 2021, p. 4).

Important though these studies are, there is obviously a good deal of planning practice at all levels that falls outside of formal statutory planning; indeed it is the informal non-statutory practices in-between the formal arrangements that may be critical in shaping outcomes. 'Formal logics of action are supplemented by informal ones emerging from complex patterns of perception and interpretation – be they individual or collective' (Reimer and Blotevogel, 2012, p. 8). Therefore, research must differentiate between the formal institutionalised instruments of planning, and informal modes of operation and instruments (Reimer et al., 2014), whilst recognising that informal activities may be no less 'institutionalised' (Blanc and Cotella, 2020). Indeed, it is the informal practices being bound up in the prevailing planning culture that tend to be more resistant to external pressures for change (Knieling and Othengrafen, 2015).

The notion of informal practice embraces legitimate actions by authorities to strengthen planning outside the formal framework by such measures as

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voluntary cooperation among municipalities to create strategies for functional regions that cut across administrative boundaries (Zimmerman and Feiertag, 2022), or in regional design exercises (Balz, 2018). There will also be much 'micro-scale' activity between actors that determines planning's effectiveness (Reimer and Blotevogel, 2012; Stead, 2012). This includes interests seeking to 'bypass the formal structures of the planning process [where] … procedures are to a large extent systematic and (almost) institutionalised in a shadow planning system' (Fox-Rogers and Murphy, 2014, p. 246). Such practices are evident in all systems, and raise particular questions about legitimacy in the absence of good governance, or where there are opportunities for negotiation and an imbalance of powerful interests and weak planning capacity.

Informal practices are more difficult to investigate. Mäntysalo et al. (2015) provide a conceptual framework for comparing the legitimacy of informal planning practices, but their study in Nordic countries is limited to a broad survey of national contexts. Qualitative research is needed, using in-depth case studies to compare and explain the interplay of formal and informal practices in tackling problems, how they adapt to the context, and the relative power of the interests represented (Quilgars et al., 2009; Reimer and Blotevogel, 2012; Verweij and Trell, 2019).

The issues sketched briefly above provide lessons for cross-national comparative research, including:

- the need for an integrative analytical approach that takes respective social models and planning cultures into account;
- recognition that social groups and actors are constantly creating and re-creating the institutions of planning, such that meaningful comparison and explanation requires a diachronic approach;
- the significance of informal practices and institutions interacting with the formal structure in shaping outcomes.

LESSONS FROM CROSS-NATIONAL STUDIES OF SPATIAL PLANNING

In this section, we examine the research design and methods of major cross-national studies, explaining their approach, having in mind the points made above. We then outline the approach of three major large-scale projects in more detail, paying particular attention to the ESPON COMPASS projects (Nadin et al., 2018a, 2021b) on which many of the chapters that follow are based. Chapter 12 returns to some of the main studies mentioned here in relation to what they tell us about typologies of planning systems.

Comparative research can serve many aims. Masser (1984) draws on Heckscher (1957) to identify two broad purposes: the transfer of experience,

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Table 2.1 Main objectives of comparative research

Category	Type	Objective	Examples
Transfer of experience	I Compilations	To compile a reference source of information on planning systems.	Ryser and Franchini (2015); Silva and Acheampong (2015); ARL (n.d.)
	II Learning	To gather information on other countries to inspire and benchmark.	DoE (1994); Nadin et al. (2000)
Development of theory	III Thematic comparison	To investigate research questions on a specific topic through the comparative method.	Muñoz-Gielen (2014); Tulumello et al. (2020)
	IV System comparisons	To compare characteristics of systems and their trajectories.	CEC (1997); Nadin et al. (2018a)

and the development of theory. We suggest two main sub-divisions of four different types, as shown in Table 2.1.

First, there are studies that are designed to provide information on spatial planning systems according to a common framework, but they do not offer any meaningful comparison other than making a 'juxtaposition of data' (Hantrais, 2009, p. 167). These are compilations of information on planning systems that follow a common scheme, usually in factsheets, with some summary of similarities and differences. They provide helpful quick reference sources within and beyond Europe (e.g., Kafkalas, 2000). Their brief reports unavoidably take the notion of 'planning' as universal, for example, the International Manual of Planning Practice (Ryser and Franchini, 2015).

Second, are studies that gather information on national planning systems to provide information for one country, the sponsor of the research. These projects take the point of view of one government and the questions it seeks to answer in an investigation of other countries, or a search for good practice by examining experience in other countries (e.g., Hall, 2013). There tends to be less concern with questions of meaningful comparison, but instead the task is to collect information and ideas that will benchmark performance or provide inspiration for reform. The conceptual framework tends towards the sponsor's understanding of planning. An illustrative example is the country profiles initiated by the ARL, the Academy for Territorial Development in the Leibniz Association which, at the time of writing, covers 31 European countries and are available online (ARL, n.d.). Each country profile follows a rigid structure focusing on the formal structure and different levels of national planning systems. The profiles also inform about, for instance, some general facts

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and figures on spatial development, the administrative structure and system of governance, and key institutional stakeholders, and offer examples of the application of statutory planning instruments.

The third type has the central objective of cross-national comparison and is concerned with theoretical development. There are innumerable international comparative studies of this type involving a small sample of countries and/or a single aspect of planning systems. Some have large samples, others compare only two countries, or even different planning systems within one country (Winter et al., 2016). They investigate a wide range of questions on aspects of planning: for example, concerning public value capturing in the planning system (Muñoz-Gielen, 2014), the impact of austerity on planning (Tulumello et al., 2020), the impact of planning reform on heritage (Nadin et al., 2018b), changing land use patterns (Siedentop and Fina, 2012; Dembski et al., 2021), citizen engagement in green infrastructure planning (Willems et al., 2020), adoption of more strategic planning approaches (Dąbrowski and Piskorek, 2018) and the role of planning in peri-urban change (Wandl et al., 2014). There are also relevant studies that compare national conditions that structure the operation of planning, such as Charron et al.'s (2019) work on the quality of government, and others in related fields such as the compilation of reports on national urban policy for large cities by Van den Berg et al. (2007) and urban regeneration (Cadell et al., 2008).

In Europe the third, but also the fourth type (see Table 2.1) of cross-national study has been encouraged by issues arising from Europeanisation. Increasing European integration has been a fillip for cross-national comparative research as policy-makers across Europe have been encouraged to look across borders when contributing to joint policy-making (Hantrais, 2009). In planning, the long-standing EU programme Interreg has funded many cooperation projects, that include a phase of research on participating countries' planning systems. Likewise, the EU research programme Horizon Europe, and the EU Joint Programming Initiative (JPI) have funded research on planning as part of other projects on topics such as environmental management and the historic built environment (Nadin et al., 2018b). Some of this work offers only limited reflection on methods, since many 'worthwhile studies in the field adopt the pragmatic tactic of just getting on with it' (Hague and Harrop, 2013, p. 362). Others have considered their methodological strengths and weaknesses carefully. They offer lessons for new studies especially when used alongside the numerous general sources on methods in cross-national comparative public policy research, including Hague and Harrop (2013) and Ryan (2017).

The fourth type is the primary consideration for this book: the system comparisons. These studies aim to make meaningful comparisons from the outset. They compare the overall pattern of characteristics of systems, and their common and divergent trends and trajectories. They also offer classifications

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or typologies of systems, which is in effect theorising about the meaning of spatial planning in relation to underlying cultures and social models.

The relatively small group of major studies listed in Table 2.2 can be described as system comparisons and are assigned to the fourth type. They give equal weight to all countries; they are explicit about the research method and techniques to ensure that the findings are trustworthy; and they endeavour to use a universal conceptual framework not tied to one country and/or they expose how concepts are understood in different ways. Many smaller scale projects involving two or three countries are also of this type but are not listed. Small projects face many of the same methodological challenges even though they may be comparing practices in only two closely related countries. Some consider methodology explicitly, such as the seminal works of Booth et al. (2007) on the UK and France, and Thomas et al. (1983) on flexibility and commitment in planning in England and the Netherlands. In Table 2.3, we list other major projects that can best be described as international compilations of information, thus fitting the first category in terms of their objectives.

Whatever the objective, all cross-national comparative research must address common challenges in its design and implementation. The large-scale cross-national studies reviewed here are almost all qualitative, and most collect data in the form of expert opinion from in-house or commissioned experts in a sample of countries through questionnaires or standard templates, often supported by more detailed case studies. This pragmatic approach is understandable given the difficulty and costs of undertaking first-hand empirical work in many countries in different languages.

Much of the material is descriptive, but there is also interpretation, especially where outcomes or trends are concerned. The collection of data by experts generally involves consultation with other experts by interview or focus group, and reference to authoritative sources of information including legislation and policy documents. Most studies have a two-level research design with an overview of all study countries and in-depth case studies of a smaller sample. The study of land value capture in planning by Muñoz-Gielen (2014) is a typical example, with analysis of secondary data from nine countries and multiple in-depth case studies in three countries.

Many smaller comparative projects are desk studies using documentary sources supported in some cases with interviews of local experts. For example, Tulumello et al. (2020) report on a desk study of the impact of austerity on planning systems in four Southern European countries and explain how the EU has influenced the adoption of more liberal planning policies. Dühr's (2007) study of cartographic visualisation in planning is a desk study of the style and content of representations in the Netherlands, Germany and England, drawing on the typology in the 1997 EU Compendium, and supported by interviews with practitioners. Buitelaar and Leinfelder (2020) examine policy reports and

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Table 2.2 Large-scale cross-national comparative studies of spatial planning in Europe

Year	Study[a]	Countries	Objectives	Variables and concepts	Research design and methods	Static snapshot/ evolution and trends	Formal system/ actual practice	Outcome
1989	Planning Control in Western Europe (Davies et al., 1989)	DK, UK, FR, NL, DE[a]	To advise the UK government on potential of a binding zoning system, in the context of wide discretion in the UK systems.		Common framework for five national case studies written by team members.	Static categorisation.	Formal system 'in theory' and 'the system in practice'.	Two categories of planning systems by 'legal certainty'.
1996	Urban Planning in Europe, International Competition, National Systems and Planning Projects (Newman and Thornley, 1996)	UK, IR, FR, LU, NL, IT, PT, BE, EL, DE, AT, CH, DK, SE NO, FI + 'Eastern Europe' In depth: UK, FR, SE	To explain political and economic forces creating common trends and scope for national deviation from them.	Legal styles Administrative structures Changing political, economic and administrative conditions.	Desk study using legal families proposed by Zweigert and Kötz (1998). Explanation of trends in four countries with city desk case studies.	Static categorisation In-depth studies examine trends in the reform of systems in three case study countries.	Formal legal and administrative structure for categorisation.	Fivefold categorisation of systems based on 'legal families'.
1997	EU Compendium of Spatial Planning Systems and Policies (CEC, 1997)	EU15 (1995) + NO[b]	To provide an authoritative and comparable knowledge source, and illustration of planning systems and policies.	Legal family Scope National competences Locus of power Public vs private roles Maturity of system Distance between goals and outcomes	National reports prepared by local sub-contractor following a common framework, reviewed by four independent experts, and edited by lead researcher.	Static description of structure and policies. Examination of trends in systems, trends in policy, and emerging issues with emphasis on EU interest.	Detailed case studies of the operation of planning in seven case studies from the 16 countries (with reference to them in main volume.[c]	Typology of four traditions or ideal types of planning. Case studies of the practice of spatial planning.

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Year	Study[a]	Countries	Objectives	Variables and concepts	Research design and methods	Static snapshot/ evolution and trends	Formal system/ actual practice	Outcome
2001	National-Level Planning in Democratic Countries (Alterman, 2001)	DK, DE, FR, IR, SW, NL, UK, (IL, JP)	To understand how countries manage planning at the national level. Knowledge transfer.	Instruments Policies Procedures Legal status Modes of implementation Integration Effectiveness	Study group created. Critical account written for each country by a leading scholar following common guidelines and joint seminar.	Static description of 'formats' of national planning. Examination of 16 trends in five themes.	Cases explain the formal structure of institutions and instruments. Cases examine practice, including the effectiveness of planning.	Identifies 13 common 'positive trends'.
2006	ESPON Governance of Territorial and Urban Policies (Farinós Dasí, 2006)	EU25 (2004) +NO, CH	To evaluate territorial governance and factors that assist or impede it. To update trends in spatial planning from 1997 Compendium.	Distribution of competences, decentralisation and devolution Inter-municipal cooperation State structures, constitutional provisions and relations between central and local government	National reports of constitutional, legal and administrative arrangements by sub-contractors following common framework, of indicators. Case studies using sub-contractors of governance at varying spatial scales.	Static classification of formal governance structures in which planning operates. Extensive examination of trends in governance changes in styles of planning over previous decade.	Categorisation of countries by 'style of planning' and how it is changing.	Categorisation of countries' movement between styles of spatial planning (EU Compendium 1997) and 'degree of each style present'; and 'first characterisation' of new member states and non-EU states according to styles.
2014	Spatial planning systems and practices (Reimer et al., 2014)	BE (Flanders), CZ, DE, DK, EL, FI, FR, IT, NL, TR, PL, UK	To examine transformations and detect trends in planning practices over 20 years, and 'coexistence of continuity and change and convergence and divergence'.	Scope and objectives Modes and instruments Scales Actors and networks Policy and planning styles	Study group: researchers from 12 countries meeting in seven workshops to define a common structure and drafting and exchange of papers.	Description of systems at the time. Examination of transformation, 'continuity and change', and dimensions and directions of change in each country.	Snapshot of system. Cases examine 'characteristic examples of planning practices', actors involved, and policy styles.	Aspects of convergence and divergence in five dimensions of change and their driving forces; overall evaluation of multiple directions of change.

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Year	Study[a]	Countries	Objectives	Variables and concepts	Research design and methods	Static snapshot/ evolution and trends	Formal system/ actual practice	Outcome
2015	OECD reports on the governance of land use (OECD, 2017a, 2017b) drawing on preparatory work on terminology and components of planning systems (Silva and Acheampong, 2015)	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. In depth: cases: CZ, FR, NL, PL	To describe planning systems of 32 OECD countries. Emphasises the critical importance of land use change, the role of urban planning and other policies, and the makes recommendations about better align spatial policy with societal goals.	Government levels and competences Spatial plans and land use plans Permitting processes Fiscal instruments Stakeholder involvement Coordination	National reports prepared by appointed local experts following a common list of questions. Literature review. Seven in-depth case studies, five in Europe.	Fact sheets provide snapshots of a few characteristics of systems. Examination of changing conditions for planning, trends in systems, and need for future refinement.	Description of formal systems in fact sheets. Case studies examine practices.	Brief factsheets on planning systems. Extensive list of recommendations on improving planning systems.

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Year	Study[a]	Countries	Objectives	Variables and concepts	Research design and methods	Static snapshot/ evolution and trends	Formal system/ actual practice	Outcome
2018	ESPON COMPASS: Comparative Analysis of Territorial Governance and Spatial Planning Systems (Nadin et al., 2018a)	EU 28 + CH, IS, LI, NO (also includes a brief review for AL, BA, MK, ME, RS, TR & XK)	To provide an authoritative comparative review of changes in territorial governance and spatial planning systems 2000–2016, with emphasis on policy integration, and Europeanisation.	Constitution and law Instruments Procedures Practices	National reports by sub-contracted 'country experts' based on questionnaires, with quality control. Five case studies of relationship between spatial planning, cohesion policy and sector policies covering 13 regions, based on desk study and interviews.	Description of systems at the time. Examination of reforms in structures and processes.	Description of system and reforms since 2000. Examination of the reality of the operation and performance of the system, especially in relationship with other spatial policies.	Review of directions of change in relation to competences, policy integration, adaptability, citizen engagement and implementation. Explanation of impact of EU law, policies and discourse on planning reform. Recommendations for spatial planning reform, and good practice on cross-fertilisation of domestic spatial planning and EU policies.

Notes: See Abbreviations section for the countries included here; [a] The study only concerned England in the UK, and the then West Germany. [b] Switzerland subsequently produced its own national volume along very similar lines. [c] The case study reports were not published.

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Table 2.3 Compilations of information on national planning systems

Year	Study	Methods
2000	Compendium of Spatial Planning Systems in the Baltic Sea Region provided short summaries of the structure of planning competences and instruments with a brief comparison (VASAB, 2000)	National reports from 11 Baltic Sea countries prepared by local experts following a common template.
2000	ESTIA (European Space and Territorial Integration Alternatives), on spatial development trends in South-Eastern European countries	Summaries prepared by local experts in six countries, without a framework, and *a posterior*i organisation by coordinator; includes trends.
2000	UK Royal Commission on Environmental Pollution Input into a review of planning in the UK (Nadin et al., 2000)	National reports by research team for seven countries following a common framework.
2005	Cost Action C11 Green structures of cities (Werquin et al., 2005)	Seminars and workshops, and case studies by national experts of policies and practices in 15 European countries.
2007	COMMIN (Promoting Spatial Development by Creating Common Mindscapes), Web-based information on the Baltic States planning systems, superseded by ARL (n.d.) (COMMIN, 2007)	National reports for 11 countries by local experts following a common template.
2014	UNECE (United Nations Economic Commission for Europe) survey of land administration (UNECE, 2014)	Questionnaire survey of national governments with 25 country responses tabulated (with minor reference to planning).
2010–2015	MLIT (Ministry of Land, Infrastructure, Transport and Tourism of Japan), online resource on 'spatial policy' systems which includes nine European countries and EU regional policy (MLIT, n.d.)	Desk research following common framework covering nine European countries.
2009	*Review of European Planning Systems*; learning lessons on planning and housing for the UK (Oxley et al., 2009)	National reports by research team for six countries following a common framework.
2015	ISOCARP (International Society of City and Regional Planners) manual on planning practice, 6th edition (Ryser and Franchini, 2015)	National one-page profiles including 48 European countries, prepared by invited authors, following a common framework, with a short comparison of trends in Europe by editors.
2019	Maritime spatial planning designations (Fraunhofer Center, 2019)	Brief national summaries for seven countries from desk study by research team.

Note: Information on planning systems formerly provided by the Council of Europe Conference of Ministers responsible for Spatial/Regional Planning (CEMAT), and the LexAlp database of legal terms are no longer available online.

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previous academic studies to explain how government discourse and institutions explain varying settlement patterns between the neighbouring countries of Belgium (the Flanders Province) and the Netherlands.

One aspect of cross-national research that gets little attention, even in the larger projects, is the 'comparison' itself, how it is made and who makes it. The earliest comparative study that we know of, by Bunbury (1938), says that 'the responsibility for the interpretation is his [the author's] alone' (p. 1). Indeed, and given that there are few undisputed facts, the comparison involves subjective assessment of qualitative data that are themselves professional judgements, albeit with reference to acknowledged sources. We found only one cross-national study that seeks to make comparison using 'objective' quantitative evidence. Schmidt et al. (2021) create a composite index and ranking of countries, giving scores to the extent of institutionalisation and integration of their planning systems. However, this quantification also involves bold assumptions and subjective assessment. It is less obvious here than in most studies which are largely qualitative, but it is no less problematic. For all studies, the key to meaningful interpretation in the comparison is common agreement on the conceptual framework: that is, what is to be measured and what it means.

All the projects listed in Table 2.2 start with a common framework of matters to be compared. It generally takes the form of a short list of variables, sometimes expressed in questions that are taken up by the research team or commissioned local experts in country reports. Also, they all include a quality control process to seek trustworthiness, although its depth varies. The conceptual framing of the studies and thus explanation of the choice of variables is generally vague, or not even discussed (Krehl and Weck, 2020). The main research questions do not suggest a theoretical position, but rather seek a characterisation of planning systems by asking simply how they compare, and to what extent they are converging. There is much less concern with explaining why they differ. Thus, with a few exceptions the bulk of the study reports concentrate on description. The study by Newman and Thornley, which specifically seeks explanation for differences, is more explicit about its conceptual framing.

The choice of variables for comparison shows that the assumed theoretical position of most studies is in the governmental tradition (Rydin, 2021). They are dominated by a conceptualisation of spatial planning systems that starts with the roots of planning in formal legal families (Davies et al., 1989; Healey and Williams, 1993; Newman and Thornley, 1996; CEC, 1997; Balchin et al., 1999; Tosics et al., 2010). The limitations of understanding that arise from this approach are well understood (Nadin and Stead, 2008; Janin Rivolin, 2012; Reimer et al., 2014). They provide insights into broad similarities and differences in planning between countries, but have limitations because they may

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not reflect the real variety that characterises planning in different places and times. Later studies tend to have a broader scope, including the involvement of stakeholders, actor networks, professional cultures, and the role of institutions.

Early studies define the form or style of planning directly from the families of legal systems. The typology of legal systems was set out by Zweigert and Kötz (1998), who themselves note the weakness of such an approach. They highlight the dangers of reducing the complexity of variation in forms of legal practice down to a few legal families, because the findings will differ depending on the aspect of law being compared and the criteria that are applied. In sum, the early studies on comparative planning systems tended to overemphasize the effect of variation in legal styles and for the operation of 'planning', it is also true that 'planning systems can operate in similar ways under very different formal government and legal arrangements' (Nadin and Stead, 2013, p. 1558).

An advantage of comparing variables related to government is that there is a well-established nomenclature in comparative government research (Hague et al., 2019), so concepts travel reasonably well between countries. This is not the case for other aspects of spatial planning, as we noted above, which have widely varying meanings of even core terms, and no generic set of concepts in planning that could apply equally in all countries.

The problem of conceptual equivalence is sometimes carefully considered in the methodology of some projects, and in others neglected. For the information compilation listed in Table 2.3 it is mostly ignored. The OECD study on *The Governance of Land Use* is unaware of the problem, saying the 'objective is to present facts about planning systems … characteristics of the planning systems that can be described unambiguously and are not subject to interpretation' (OECD, 2017a, p. 12). In contrast, consideration of how concepts 'travel' between countries (Pennings et al., 2006) is at the heart of the truly comparative projects.

The question of conceptual equivalence is taken up most seriously in the few comparative studies that have worked over a longer time frame. They have brought together researchers from different countries to discuss the meaning of key concepts in seminars and study visits. In this way, the objective is to achieve a sense of 'talking the same language'. Prominent in this type of study is the Franco-British Planning Study Group, operating since 1997 (Booth et al., 2007), which over time has developed a 'depth of knowledge and rigour that bilateral exchanges can bring' (Sykes et al., 2015, p. 102). One of the larger studies fits this type. The ARL study (Reimer et al., 2014) was the product of a series of seven lengthy workshops among a small group of like-minded academics, during which a measure of common understanding could be achieved.

To some extent the limited explicit conceptual framing in these cross-national studies is a result of what is practically possible. In studies involving many

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countries it is not possible to investigate the detail of local-level practices, the interplay of actors and interests, and the exercise of power. The purpose is to provide broad-brush comparisons to construct taxonomies or typologies, and to understand trends. In this there is inevitably a tendency to use the readily available and relatively uncontentious data on government. Nevertheless, the sparse attention to theory that might explain differences is surprising.

The review of the large-scale projects given in Table 2.2 suggests an alternative view to the criticism that large-scale comparisons are not much more than static snapshots of formal systems (e.g. Reimer et al., 2014). Whilst there is no doubt that the description of official instruments and procedures is a significant part of the projects (including the ARL study), most also give attention to the actual practice of planning. They do this, for example, by in-depth study of a smaller sample of episodes of planning, as in the Newman and Thornley (1996) study, or by a comprehensive collection of case studies of planning in operation, as in the EU Compendium project (CEC, 1997). Similarly, most studies also pay some attention to trends or reforms in planning. Indeed, this is the main purpose of the ESPON Governance of Territorial and Urban Policies study (Farinós Dasí et al., 2006). We examine in more detail three of the main comparative projects in the next section.

THE EU COMPENDIUM

The EU Compendium of Spatial Planning Systems and Policies (CEC, 1997) was commissioned by the European Commission's Directorate General for Regional Policy to compare planning in the then EU15.[1] It starts from the legal and administrative basis for planning, but also addresses six other relevant variables: the scope of the system in terms of policy sectors covered; the extent of national and regional planning; the locus of power and competences of central and local government; the roles of public and private sectors; the maturity of the system (how well it is established in government and public life); and the apparent distance between expressed goals for spatial development and outcomes. The theoretical position is not clearly expressed, but in essence it is an institutionalist approach which recognises that planning practice is embedded in place. It set out not to provide a single understanding of planning, but 'to define more precisely the meaning of the terms used in each country' (CEC, 1997, p. 23).

The Compendium involved a large research team and extensive dialogue among its members. The project leaders appointed a sub-contractor for each country who liaised with their national administration in drafting a country report and detailed case studies of planning in operation following common guidelines. The templates for country reports and case studies were designed in workshops involving all sub-contractors with the aim 'to develop a common

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understanding'. Four independent experts reviewed all reports to assist in quality control and consistent use of terms. The principles underpinning the research design and its application were that the work should be authoritative, consistent across the countries, comparative, contemporary and comprehensive (Shaw et al., 1995).

Individual country volumes were published which provide a snapshot of systems and a commentary on trends, together with an overview comparative report. The comparison explains variation of systems using four 'ideal types' or traditions of planning: namely, regional economic, comprehensive integrated, land use management, and urbanism (CEC, 1997, pp. 36–37). There is no taxonomy of systems based on the variables. The four ideal types of planning have subsequently been cited many times, and a number of comparative research studies on spatial planning have built on the methodological foundations laid by the EU Compendium (e.g., Böhme, 2003; Kule and Røsnes, 2010; OECD, 2017a; Othengrafen, 2010).

The breadth and depth of the study's reports are its undoubted strengths, but it is limited to the then EU members, that is, Western Europe. Nadin and Stead (2013, p. 1555)[2] note that the study 'goes well beyond the legal and constitutional structures, and thus accepts a wider notion of planning system'. They also consider the use of the ideal types to have advantages over taxonomies, although the method of drawing the types from the evidence gathered is opaque. These questions are taken up in Chapter 12. Trends and actual practices are considered, in both the country reports and the case studies, although the published reports concentrate on a static description of the formal structures.

GOVERNANCE OF TERRITORIAL AND URBAN POLICIES (2006)

The EU Compendium's framework of ideal types has been used by subsequent studies; the largest of these by some way is the Governance of Territorial and Urban Policies project (Farinós Dasí, 2006), which investigated trends in 29 countries (all EU member states at that time, plus Norway and Switzerland). Its objectives were to classify the countries' governance arrangements and to review changes in spatial planning to make 'a modest update on the movements that took place since' the Compendium report, and to find and explain good territorial governance practices (p. 112). The study is inductive rather than theoretically driven. The variables chosen for analysis put the project very firmly in the governance tradition, comparing the characteristics of the administration of spatial planning with structures of government and central–local relations. As the name suggests, much of the project concerns changes in governance

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generally, especially shifting competences arising from decentralisation and devolution, and inter-municipal cooperation.

The research was conducted by a consortium of local experts who provided national overviews and case study reports following common guidelines, although experts were also asked to give their perception of the 'style of planning' with reference to the EU Compendium 'traditions'. The method of comparing national results is explicitly addressed and entailed the conversion of qualitative data into quantitative data, and the systematic tabulation of findings and further testing of the synthesis with national experts. The analysis through quantification is very complex, and is less a comparison of spatial planning and more 'a classification of the formal governance arrangements within which spatial planning operates' (Nadin and Stead, 2013, p. 1556). The study takes forward the ideal types from the EU Compendium to the 29 countries and so provides much wider coverage of Europe, but unfortunately treats the types as classes and thus simplifies and modifies their meaning. This study has the advantage of covering many countries, but the reduction of qualitative data to numbers and their subsequent assessment obscures rather than clarifies the analysis.

ESPON COMPASS 2018 AND 2021

In 2016, ESPON (the European Observation Network for Territorial Development and Cohesion) representing the 32 ESPON member states – the then 28 EU member states plus the European Free Trade Association (EFTA) countries – commissioned the COMPASS study 'to undertake an updated systematic comparative analysis of territorial governance and spatial planning systems across Europe' (ESPON EGTC 2015, p. 3).[3] An additional feasibility study of seven countries in the Balkans was also undertaken (explained in Chapter 10), which makes a total of 39 countries (Figure 2.1) considered in the Final Report (Nadin et al., 2018a). A smaller follow-on study was later commissioned to search for practical recommendations on the cross-fertilisation of spatial planning, cohesion policy and other sectoral policies (Nadin et al., 2021a). The projects consider experience of previous research in their design, notably that the core of the project should be about change over time and actual practice as well as formal structures. Because the chapters that follow in this book draw on the evidence provided by ESPON COMPASS, more explanation of the approach is in order.

The overall objective of ESPON COMPASS was to provide an authoritative comparison of territorial governance and spatial planning systems in Europe, with an accent on relations between spatial planning, cohesion policy and other sectoral policies. Rather than a static snapshot, the analysis concentrates on directions of change, especially bearing in mind the effects of the influential

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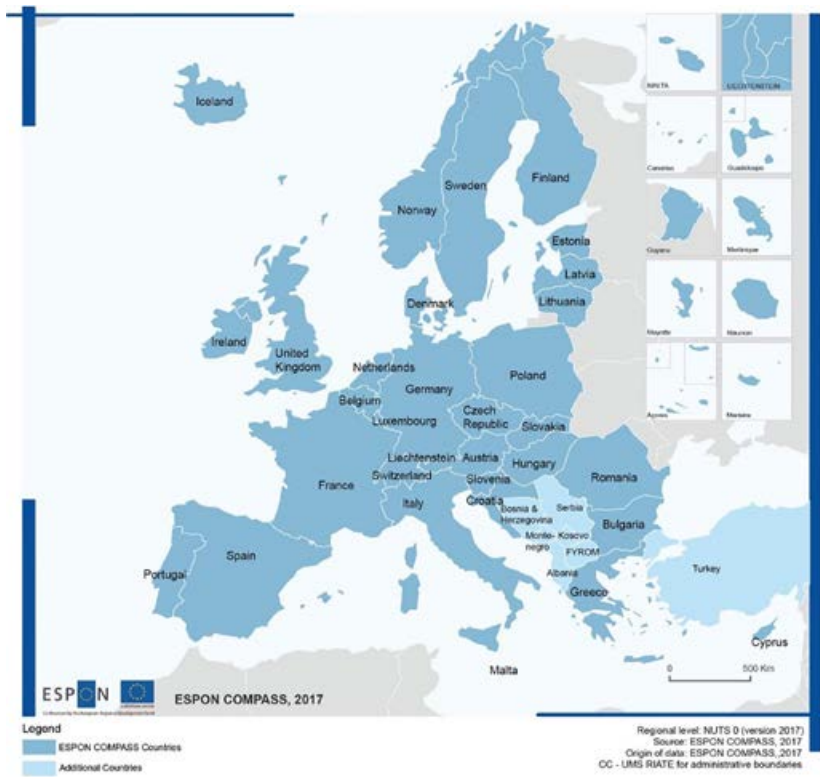

Source: ESPON Compass Final Report (Nadin et al., 2018a, p. 3) © ESPON EGTC.

Figure 2.1 Countries examined in ESPON COMPASS

EU backdrop. The Final Report describes changes in spatial planning and territorial governance in Europe between 2000 and 2016, explaining change with specific reference to EU law and policy. There was no intention for this project to produce country reports, although the volumes of data on the countries are available from the ESPON EGTC on request.

The conceptual framing of the COMPASS project is in the process of Europeanisation as explained above, and the notion of planning as a process for the coordination or cross-fertilisation of the territorial impacts of policy. This is reflected in the main body of the report.

Designing practical steps to systematically collect reliable and comparative data involved negotiation and compromise about resources and time available. The start date of 2000 broadly aligns with the launch of the European Spatial Development Perspective (ESDP) approved in May 1999, and the accession

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process for former communist countries, Cyprus and Malta. Like previous large-scale cross-national comparative projects, the research design involved the collection of data through independent country experts, in this case by two rounds of questionnaire survey. There was a second level of investigation in five in-depth case studies. A core project team of six partners with members from Northern, Southern, Central and Eastern Europe prepared the framework for investigation concentrating on the main issues explained above. There was extensive discussion and advice provided about terminology (discussed in Chapter 3) and the meaning of the questions with concrete examples provided of completed questionnaires. The country experts were expected to provide data based on their own knowledge with reference to readily available published sources, and to consult with other experts involved in spatial planning and/or regional and urban policy through interviews or focus groups. The questionnaires were piloted in Germany, Hungary and Poland.[4]

The objective of the follow-up project was to prepare and test practical recommendations for improving cross-fertilisation between spatial planning, cohesion policy and other sectoral policies. The research took the form of an 'interactive dialogue' with selected experts from 32 European countries. The research design involved four phases of work on the dialogue, together with an in-depth case study in the Czech Republic (Piskorek and Balz, 2021; Maier et al., 2021). Fifty-one experts took part in the dialogue from an initial sample of 144. The first phase of the dialogue focused on refining initial propositions on factors determining the effectiveness of cross-fertilisation and providing an overview of available instruments and good practice. This was done by mining the data from the first COMPASS project and a literature review. In the second phase an online survey was used to collect professional assessments of the propositions from a selected sample of professional experts, who were selected to ensure a wide coverage of the European territory and a balance between those whose primary expertise is in spatial planning or in cohesion/sectoral policy. The findings from the questionnaire were used to propose recommendations which were tested in a third-phase dialogue event involving 45 experts.

The general approach of the main ESPON COMPASS study starts with 'the government tradition' but is rather eclectic beyond that, addressing the key framing positions of Europeanisation and cross-fertilisation, but also borrowing from other ongoing themes of debate on adaptive planning and the involvement of stakeholders in a wider territorial governance perspective. Each of the themes is referenced back to theory which provides a conceptual framework from which to devise measures in the form of categories in which responses could be made (Nadin et al., 2021a). The variables chosen in the first round of data collection concentrated on describing the formal arrangements for spatial planning and territorial governance, including the underpinning constitutional and legal framework; administrative structure and competences; the form of

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planning instruments; planning procedures; and the influence of EU law and policy. The second round concentrated on the actual practice of spatial planning including the production of instruments, the adaptiveness of instruments in use, the relationships between planning and other sectoral policies, citizen engagement, and the domestic influence of EU discourse.

Case study locations were chosen in a two-step process. In the first step, possible locations were reduced to 13 to align with priorities of the Territorial Agenda 2020 (MSPTD, 2020) such as polycentricity, peripheral regions and cross-border working, governance characteristics, and exposure to EU cohesion policy. In the second step, five locations were chosen, including one cross-border case. The methods of enquiry included desk research, interviews and focus groups. They are explained further in Chapter 9.

The core team made comparisons in an iterative process of sharing findings after organising and juxtaposing data and visualising the varying responses. Quality control was a major part of the project, with review and revision of questionnaire returns and case study reports which raised questions where there was uncertainty, for example, about the understanding of terms. Draft findings and reports were shared with the ESPON Monitoring Committee members and the ESPON contact points (both of which include representatives of all countries involved). Responses were fed into the quality control process, with further clarification of data as necessary.

There are very clear limitations of the methods adopted for the COMPASS project, especially arising from the objective to examine actual practices as well as formal arrangements. Expert opinion on practice is just that, opinion, and is more difficult to reference to documentary sources. There is always the risk that another expert would give a different view, undermining trustworthiness. Obviously the findings must be read with that in mind. Country experts had to generalise a great deal, with limited opportunity to record inevitable fluctuations in policy over a 16-year period, and variation in trends in different parts of large federal or regionalised countries. Opportunities were provided for respondents to highlight significant variation within the country, but this seldom flows through to general findings. The quality control process did improve reliability by challenging respondents to give more detail or clarify responses, or in challenging apparently inconsistent responses, but there is inevitably some partiality in the findings. Some anomalous data were questioned, and clarification required, yet a few surprising findings remain. After review of the work by independent experts and other national representatives, the findings are reproduced as given.

As in the other large-scale projects the sheer amount of data produced creates a challenge for synthesis. Other projects have dealt with this by quantification, but that may give only an impression of validity when the data is qualitative.

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In this project, the synthesis is achieved through presenting as much data as possible in a visual way which accentuates the generalisation involved.

Despite these limitations, the COMPASS project was able to provide insights about general trends in spatial planning across Europe. It has been possible to address recognised weakness of international comparative research, and the key issues raised above. It goes further than providing a snapshot of the formal mechanisms and policies and simple 'juxtaposition of data' (Hantrais, 2009, p. 2) to provide a real comparison of trends. The methods of data collection and quality control provide a sufficiently solid basis for identifying and comparing key trends and drawing informed conclusions.

SUMMARY

This review of cross-national research methods suggests that most large-scale cross-national comparative research on planning has followed a similar approach involving appointed experts with local understanding, and a multi-faceted research design including wide and general surveys following common guidance. The large-scale projects make use of case studies to address more fully the fluid nature of systems and informal practices with more first-hand documentary and interview-based investigation. The approach of large-scale comparative studies is in the main a pragmatic response to the need to operationalise demanding research questions.

In the truly comparative projects, there is conscious consideration of the conceptual framework, and often its limitations. There is a strong tendency for this to be led by the governmental context, though usually with consideration of other factors. However, the theoretical position of the larger studies is generally implicit, and the recognition of the problem of 'conceptual equivalence' varies. This review does not support the criticism that the studies only provide static snapshots of formal systems or ignore actual practice. Far from it: the comparative studies summarised here all recognise the importance of change over time and the reality of planning practices. In contrast, the compilation style projects mostly provide static information on the formal structure of systems. This is not to say that they are not correct or not useful, but that they have a different objective. Snapshots of key data are of interest.

Do the studies succeed? The main studies listed in Table 2.2 achieve their stated objectives. In the main the findings are trustworthy within the objectives set. There is recognition of the challenge of conceptual equivalence and the dynamics of system change, though with more or less impact on the approach to the study. The accent has been on the formal institutions of planning, although the ESPON COMPASS project does address practices. However, there is little reference to underlying informal institutions: professional and institutional cultures that govern how the system operates. The compilation

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projects are successful in what they set out to achieve, but are not at all reflective on their methods. The comparative projects are more reflective and identify their limitations. Nevertheless, we agree with Sykes et al. (2015, p. 99) that 'there is no need to be overly pessimistic about their feasibility and value'. Comparative studies have collectively provided general understanding both of commonalities and differences in planning among European countries, and how they are changing. Understandably, the conclusions are very general, but judged by citations in the academic literature they provide helpful contextualisation for more detailed academic studies, and professional benchmarking and learning. They also offer experience of how to go about the task of cross-national comparison, and there is a clear trend towards more explicit consideration of theoretical positioning and reflection on the research design.

NOTES

1. Norway also joined the Compendium consortium, and Switzerland later produced a volume following a similar framework.
2. This is not an independent evaluation; Nadin is one of the authors of the EU Compendium.
3. The ESPON COMPASS project (Comparative Analysis of Territorial Governance and Spatial Planning in Europe), 2006–2018, was coordinated by Delft University of Technology in partnership with Nordregio, Politecnico di Torino, University College Dublin, Polish Academy of Science, Hungarian Academy of Science, Spatial Foresight and the Academy for Territorial Development in the Leibniz Association.
4. See: https://www.espon.eu/planning-systems.

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