



HOW CAN COMPARATIVE SPATIAL PLANNING STUDIES CONTRIBUTE TO EUROPEAN UNION COHESION?

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Abstract. The aim of this article is to identify the relevance and possible application of comparative spatial-planning research in the context of the EU's territorial cohesion themes. Research questions formulated were as follows: (1) what are the key considerations and methods for making comparisons between spatial planning systems?; (2) how is the legal and institutional context addressed in comparative research?; and (3) how can the comparative research on spatial-planning systems that is (or can be) carried out translate into the objectives of EU policy on territorial cohesion? This article represents an overview in the above context. It first relates the objectives and specificities of cohesion policy as defined in the literature to the research challenges. It then identifies the main reasons (also noted in the literature) for spatial-planning issues to be made subject to comparison, the methodological challenges in so doing, and the specificity present as legal and institutional conditions are compared. A basis is in this way provided for an indication of the relationship pertaining between comparative research and the development of territorial cohesion.

Keywords: territorial cohesion, comparison, spatial planning, Europe, law.

Introduction

Diverse conditions and processes are seen to determine European Union policies, including Cohesion Policy, and the effectiveness of the approaches it takes. There can be no doubt that, in given Member States, spatial planning as implemented is among the factors playing a key role. However, there are difficulties in addressing spatial-planning issues uniformly and seamlessly across the EU, as states' differing conditions shape the pursuit of such planning. There will naturally be a legal and institutional framework in place (and at the national, regional and local levels of planning), but attention will also need to be paid to social, economic and cultural frameworks, as well as ongoing spatial processes *per se* – be these positive or negative. These also produce directions to the steering of spatial development that differ from one country to another. Notwithstanding this major internal differentiation, the issues referred to do translate very strongly into the supranational sphere, including activities at European Union level (Szlachta & Zaucha, 2015). Ultimately, if care is to be taken to ensure equality of economic and social opportunity across the Union, much will depend on the manner in which spatial development is pursued, and the quality

achieved as that is done (Nadin et al., 2024). That continues to imply difficulties with the drawing of broader, more-generalised (let alone EU-wide) conclusions. Spatial planning does indeed vary greatly from one Member State to another – to the extent that the highest common factor may reside in gross over-simplifications of analysis based around very selected issues being compared. Any targeted transfer up to EU level of individual states' data on planning and spatial development will need to factor in the comparative knowledge on spatial-planning systems that an extensive literature is able to supply. It is thus to a determination of the relevance and possible application of comparative spatial-planning studies in the context of the territorial cohesion themes of the European Union that this paper has turned its attention; on the basis of research questions formulated as:

- what are the key considerations and methods for making comparisons between spatial planning systems?
- how is the legal and institutional context addressed in comparative research?
- how can the comparative research on spatial planning systems that is (or can be) carried out translate into the objectives of EU policy on territorial cohesion?

Work detailed here has sought to single out those planes of EU Cohesion Policy for which the development of spatial planning is (or could potentially be) of importance. Within that framework, particular attention was then paid to territorial cohesion, in terms of objectives and the relationship with spatial planning. This was followed by broader analysis of the literature on comparative spatial-planning systems (also extending beyond the EU context), with emphasis placed on cohesion-relevant theses and broader proposals. In essence, the review procedure seeks first to refer to those theses in the literature attending to matters of 'why make comparisons?', with the attention then turning to the (often very elaborate) answers to the 'how to make comparisons?' question. A further focus is on theses dealing directly with comparisons of legal conditions and planning practice, ahead of a final-section proposing of possible directions in which the two spheres may be linked further, as optimal ways of making comparisons between spatial planning systems are identified, with a view to their proving their worth as objectives of territorial cohesion are pursued.

Achievement of the above aims was and is seen to denote active linkage of discrete subject areas. On the one hand, there is the literature treatment of Cohesion Policy *per se*, and its territorial and spatial context in particular. On the other hand, we find the extensive (not always structured) discussion on methods of making comparisons between spatial-planning systems. In that domain, the legal context demands particular attention. A linking-up of identified issues is attempted, with each separate part of the article making reference to what the author concludes are the key literature and theses. Efforts are made to interrelate these, and to propose further directions of research.

Territorial cohesion and spatial planning

Intrinsic to EU policies (at least from 1997 onwards), territorial cohesion is a concept with strong links to sustainable development (Zagrzejska, 2014; Medeiros, 2016). That said, the literature makes it clear that relevant guidelines long remained quite general in their nature. Furthermore, objectives of territorial cohesion are forever linked significantly with those of a social and economic nature. It has thus been the role of research (including that falling within the ESPON framework – Knippschild, 2011; Zaucha & Böhme 2020; Medeiros et al., 2023) to strive to add both

precision and specificity. The ESPON Programme as such aims at gathering necessary analytical knowledge as regards the spatial regularities to the EU's socio-economic development, where priorities of a territorial nature include a strengthening of polycentric development and innovation through networks extending between regions and cities, a strengthening of Trans-European networks (TENs), and trans-European risk management also extending to the effects of climate change (Szlachta, 2011). Such directions have been taken by other studies too (e.g. Maier, 2012; Szlachta & Nowak, 2021). But any pursuit of territorial cohesion must denote specific analysis of the territorial imbalances that in fact obstruct broader comparison arising out of the needs of individual areas (Sykes, 2008; Garau et al., 2024). This does not prevent objectives relating to territorial cohesion being included in core EU documents on a regular basis.

The context of spatial planning is very noticeable in a variety of EU documents, as is the linkage between territorial cohesion and the economic and social objectives of the wider Cohesion Policy. Since particular spatial-planning issues are important to broader development policies, comparative study is obviously essential. If spatial planning can respond to specific challenges across the whole EU, all national specificities (and differences) will need to be taken account of as answers are provided. As early as in 1999, the European Spatial Development Perspective emphasised the importance of spatial-development policies and decisions, and the way these might translate into sectoral policies. It was deemed particularly important for measures identified to be coordinated with goals as regards sustainable development (themselves understood differently from one country to another). The ESDP is viewed as foreshadowing fully-fledged policy on territorial cohesion (Faludi, 2006). Themes relating to the spatial-planning sphere also make their appearance in more-recent documents, such as the Urban Agenda for the EU (EU Ministers, 2016) – in which sustainable land use is a key demand; the Territorial Agenda (Eu Ministers, 2020a) – which emphasises appropriate land use and land protection in the context of climate challenges; or the Leipzig Charter (EU Ministers, 2020b) – describing diverse aspects of sustainable urban development. In all the areas identified, a key role is played by domestic spatial-planning tools (of course pursued at different administrative levels). Both the overall, related objectives and the effectiveness of spatial-planning tools (e.g. spatial plans) at different levels prove important; also determining to a significant extent the achievement of EU-wide objectives of development policy.

These relationships have been recognised in the literature. Cotella (2019) pointed out that there is a 'spatial impact' and an 'urban dimension' to the EU's sectoral policies; even as there is also a lack of formal frameworks by which national spatial policies might be shaped from an EU perspective – further ensuring the crucial nature of non-legal processes and promoted practices (Cotella & Rivolin, 2024; Cotella et al., 2021; Böhme & Redlich, 2023). In this view, the capacities of individual countries to carry out specific spatial tasks are crucial (Cotella et al., 2021), as well as the role of planning stakeholders (Purkarthofer, 2018).

There is no doubt that a factor underpinning effective territorial cohesion is the quality (including the effectiveness) of different countries' development documents (also existing at different levels). But these obviously prove difficult to collate and compare in a uniform and detailed manner (Demeterova et al., 2020). The same can be said of spatial-planning documents. In addressing the local perspective to spatial policies, we must recall that the above-mentioned demands of Agenda 2030 are also addressed to local authorities, and include – for example – key guidelines for spatial policies related to the curbing of urban sprawl (Nowak & Szlachta, 2021). All that said, there has proved to be a long-term inability to achieve more-concrete integration of spatial planning into the guidelines regarding Cohesion Policy. As Janin-Rivolin (2008) pointed out, a key barrier lay in the specificity of EU policies, whose impact translated into a promotion of non-

legally-binding programmes relating to spatial policy. There were thus difficulties with translation into the regulatory sphere affecting most European spatial-planning systems (Nadin et al., 2024). In fact, as the EU level continues to lack adequate guidelines for any formulation, the notion of the ‘Europeanisation’ of spatial planning – as used in the literature (e.g. Nadin et al., 2024) – can make only very limited reference to the regulatory spheres of specific countries. It is not the role of this publication to judge whether the present situation as regards the state of regulation should be changed, and (if so) how broadly the institutional framework related to spatial planning at national level should be determined – for that is a topic for a separate discussion. There is nevertheless no doubt that the failure to translate European guidelines into the institutional sphere of Member States’ spatial planning limits effective pursuit of policy on territorial cohesion.

The limitations identified here and elsewhere are made all-the-more problematic by the multi-faceted nature of links between territorial cohesion and spatial planning. These are especially visible where the focus is on selected processes from social, economic or socio-economic geography. As Medeiros et al. (2023) point out, spatial planning gains reflection in such territorial-cohesion issues as the strengthening of polycentric urban development, border cooperation, or the shaping of transnational planning processes, among others. Nevertheless, the literature notes significant barriers to this type of cooperation, among which it is worth noting the structure of the public administration involved, legal conditions and cultural barriers, as well as the different resources and competences of the individual partners (Knippschild, 2011). It is noteworthy that the indicated discussion stream also invokes the legal and institutional context as a potential barrier. In turn, it was in the context of the challenges and problems of international cooperation that Nadin (2012) pointed to a need for a new wave of comparative policy research to be developed in Europe. One consequence of that was the development of the COMPASS report (Nadin et al., 2018), also a landmark from the perspective of the discussion on spatial planning (as discussed in more detail below).

Strong links between territorial cohesion and spatial planning can thus be taken as read, with the latter linked very strongly to development policy (and documentation), given their capacity to condition quality. In consecutive EU documents (with a special focus on the Territorial Agenda 2030), it is increasingly possible to discern the spatial context. At the same time, however, there is no doubt that policy efficacy as regards the objectives of territorial cohesion depends on knowledge – and indeed on the widest possible consideration – of the different Member States’ legal, political and cultural contexts. In this context, the call for the objectives of territorial cohesion to be clarified through in-depth research seems of particular importance. For it is on this basis that a multifaceted relationship can be established between measures relating to territorial cohesion on the one hand, and comparisons of spatial planning systems on the other. At the same time, special attention will need to be paid to the legal and institutional context underpinning spatial planning in EU countries.

Concluding this chapter from a European perspective, key objectives related to spatial planning are seen to be sustainable land use (i.a. through a curbing of uncontrolled development), as well as a better level of accounting for climatic and natural challenges. The current system emphasises the importance of good practices, and the implementation (into national systems) of more general demands from a spatial-planning perspective. However, it is clear that a significant part of the Cohesion Policy objectives depend on both the formal/spatial legal arrangements in place in each country and planning practice at both national and local levels. This is also why it is so important for similarities and differences in national planning systems to be analysed, including through a relevant comparative methodology being developed.

Reasons to compare spatial planning systems

There has been an ongoing, broad discussion on how systems of spatial planning might be compared. Indeed, as [Bourne et al. \(1984\)](#) point out, this was already happening in 1908. On the other hand, [Zimmermann and Momm \(2022\)](#) contend that comparative analysis encompassing the perspective of the EU countries only developed more strongly after 1990 (with a broadening and partial redefinition of the European integration formula). A manifestation of this was the (1997) Compendium of features of EU Member States' planning systems.

It has in fact been very typical for comparative analyses to be run independently of the dominant current of discussion (with nothing more than a critical juxtaposition of individual case studies). Bearing that in mind, any first step in reviewing discussion of compared spatial-planning systems will see the focus of analysis turn to the dominant reasons for comparisons to be made in the first place. From the perspective of this article, a major reason for that would be improved pursuit of territorial-cohesion objectives at EU level. In reality, however, this reason has received only relatively rare mentions in the literature. This leaves it all the more relevant (and potentially fascinating) to identify other reasons, and to juxtapose them with the one this article proposes.

[Sykes et al. \(2023\)](#) refer to the historical context, including differing spatial-planning arrangements. Comparisons framed in this way can answer questions regarding path dependency, and provide for joint identification of how past decisions shape the present. In other words, by tracing spatial solutions and processes in several countries in a broader, historical context, we may reach conclusions as to the determinants of specific processes. Comparison pursued in this way may avoid potential pitfalls (relating to certain types of instrument or activity). While this rationale for making comparisons is to be found very often in individual publications, an inherent risk has to be borne – of specific solutions/institutions in several countries being juxtaposed too quickly (and thus simplistically), even when the historical context is extensive. Nevertheless, a similar direction in justifying comparison was expressed in older, often classic publications. [Bourne et al. \(1984\)](#) were among those to stress the need for systems to be evaluated comparatively. He emphasised that this was important for national planning practices on the one hand, but also for planning theory on the other, especially when it came to the manner in which institutions changed (under different social, economic or cultural conditions). It was thus the institutional context that the author saw as key for those making comparisons.

Building on previous literature, [Zimmermann et al. \(2023\)](#) propose a distinguishing of three answers to questions as to why spatial-planning systems are to be compared. First, comparisons allow a harmonised understanding of planning to be sought, with a breaking-down of barriers to the integration of planning systems. Second, comparisons can provide core knowledge from the perspective of national planning practices; and third they can sustain an expansion of planning theory and the generation of theory-based knowledge. However, the latter rationale can again be viewed as raising a certain risk of simplification (and associated limitations). Goal-oriented publications run the greatest risk of fragmenting coverage and engaging in over-simplification as they make comparisons. By contrast, with regard to the third justification mentioned, it is worth pointing out that [Sykes et al. \(2023\)](#) note the overlap between 'general' planning theories and themes of enquiry in international planning studies - particularly highlighting the role of the increasingly important interdisciplinary approach in this context. In the same kind of connection, [Zimmermann and Momm \(2022\)](#) highlight identification of universal patterns common to particular groups of countries, and the way global dynamics are affected by the planning field in different countries.

With all the above considerations taken account of, it is possible to arrive at a somewhat-revised account of the reasons for comparisons (even if this is in the same vein as the above). Thus, we may note:

- reasons arising from practice (including expectations/perspectives of national, regional, local authorities or practitioner communities);
- reasons arising from the challenges of theory;
- joint reasons (combining the theoretical and practical dimensions).

In fact, from the perspective of a significant part of the publication, the indicated reasons are interdependent, and the key challenge in fact remains the right mix and balance between the spheres of theory and practice.

Reference can also be made to more-specific approaches. [Healey and Upton \(2010\)](#) pay particular attention to a critical view being taken of the international diffusion of planning ideas and practices, as well as the ethical and methodological issues of international exchange in the planning field. [Peric Momcilovic and Hoch \(2017\)](#) note the importance of comparisons in the context of collecting itself providing necessary information. In this same context, [Sykes and Dembski \(2019\)](#) are specific in noting how comparisons allow for a determination of how particular detailed aspects of planning are covered in differing national systems. In turn, as they perceive the issue from the perspective of the learning of comparative planning research. [Zimmermann and Momm \(2022\)](#) also note the importance of planning education, in the context of discussions over the role of international planning studies.

Even such a brief overview is in a position to illustrate the degree of variation present in detailed justifications for comparisons. However, what undoubtedly follows on from that is a conclusion as to the need for issues being compared to receive an interdisciplinary approach, with the broadest possible understanding of the diverse international context.

The main reasons the literature identifies for making comparisons link very closely to improved efficacy of achievement when it comes to Cohesion Policy objectives. The avoidance of planning errors, safeguarding of broader evaluation, differentiation of specific approaches in planning practices and wider education can all undoubtedly prove of worth from a European-level perspective. And it needs stressing that the reasons stated link Cohesion Policy with calls for specific yet common solutions. To be added from a different perspective is the notion that both theoretical and practical reasons for comparing offer guarantees that Cohesion Policy will improve (with both knowledge of potentially-useful practical solutions and broader theoretical input offering more-in-depth answers where particular challenges are concerned). From among the reasons identified, it seems particularly important that barriers and weaknesses should be identified. Such in-depth analysis seems crucial, from a European perspective as well.

Against this background, it can be concluded that publications containing a simple juxtaposition of case studies/instruments from, for example, two different countries, will not prove of significant scientific value in further discussion (while even the practical value of the studies indicated might prove debatable). The value increases in line with the universality of result coverage (involving both numbers of countries involved and profundity of comparison). This reason likewise makes it important that an appropriate method be selected when making comparisons.

The nature and limitations of methods for comparing spatial-planning systems

The review thus far reveals both different objectives for the literature to make comparisons of spatial-planning systems, as well as different legal and political, but also social and cultural, specificities of the countries being compared. In fact it is this very diversity that introduces a fundamental barrier to achievement of the research objectives set.

On that basis, there needed to be recourse to an analysis of how the literature identifies optimal ways of making comparisons, as well as the limitations existing in this respect. And, despite its more technical and methodological nature, the question of how best to make comparisons proves equally relevant from the perspective of this article's concern with a deepening of the quality of Cohesion Policy.

As long ago as in the 1980s, [Masser et al. \(1984\)](#) were already pointing to the key issues involved as methods by which to compare spatial-planning systems were developed. Among other things, they identified as key topics the generation of comparable (urban) data, the determining of how to use the data, and the translating of theoretical issues into the realm of practice. For their part, [Nadin \(2012\)](#) and [Sykes et al. \(2023\)](#) point to what they see as key related questions. In their view, any undertaking of comparisons need to be preceded by a determination as to what exactly should be compared. The subject matter of the comparisons made should then ensure an understanding of resulting similarities across countries. Furthermore, those making comparisons should attend to whether certain ways of thinking/concepts related to planning (which are the benchmark of the comparisons) are so universal as to remain understandable from the perspective of all systems being compared. Numerous examples can be given here. If, for example, we are attempting to compare the way in which the 'right to the city' concept ([after Nowak & Rocco, 2024](#)) is implemented in the systems in question, then we must rest assured that the present concept will be fully understood in those systems. The above example shows that comparisons of urban-planning systems from different perspectives can be attempted. However, it should be borne in mind that such attempts entail risk that the assumptions/comparison concept will diverge from the specifics of the particular system being compared. Therefore, it is important to look for common, if possible universal, levels of comparison. [Sykes et al. \(2023\)](#) proposed eight themes that allow for a common, synthetic characterisation of spatial-planning systems. They distinguish in this context: administrative / legal context; scope of planning (planning system); balance of competences between levels of government; extent and type of planning at national, regional and local level; stakeholders in the planning systems; regulatory / discretionary nature of the planning system; capacity of the planning system; and formality / informality in planning. The above proposal provides a comprehensive overview of the issues under comparison. However, a universal categorisation from such a perspective of all countries may be problematic. In theory, there are attempts to collectively identify key characteristics of global countries from a spatial-planning perspective ([OECD, 2017](#)). In practice, however, the comparison of specific issues poses challenges to the indicated, generalised lines of categorisation. Furthermore, as specific issues are compared, piecemeal consideration of individual criteria can also prove research-risky. This is for example true of the criterion related to the discretionary / regulatory nature of the planning, which may have a different meaning and practical translation in different parts of the world.

Seeking a common basis upon which to make comparisons, [Zimmermann and Feiertag \(2022\)](#) distinguish:

- the need to determine numbers of cases compared (systems/countries, cities, etc.), as in turn determining the depth of comparisons, with a smaller number of countries being compared guaranteeing greater depth;
- account being taken of the peculiarities of cases being compared, including those arising from indigenous planning culture;
- the need to identify such conceptual solutions as can help with the universal capture of different solutions / problems in the individual cases being compared;
- the appropriate use of data in comparisons.

It is arguable that such starting criteria taken into account as comparisons are made also make it worth clarifying the specificity of the problems, as is relevant from the perspective of the issues being compared, and occurring in the countries being compared. Notwithstanding the numerous barriers identified above, it is possible to point in contrast to certain problems and challenges that can be described together, despite their characterising radically different countries ([Nowak, 2025](#)). Balancing similarities and differences as comparisons are made is thus a key research challenge where occasions of this kind arise. The literature points out that, in developing criteria for the making of comparisons, it is crucial to address the scale of the similarities and differences present in the systems being compared ([Sykes et al., 2023](#); [Nadin et al., 2024](#)). Accordingly, objects of comparison must be as similar as possible (e.g. because cities, or regions in different countries, are somehow similar), and research objectives must be formulated very precisely ([Dembski et al., 2021](#)). This reflects the way in which any generality of approach risks inaccurate comparisons being made. In other words, there is a need to apply a ‘principle of symmetry’ (after [Sykes & Dembski, 2020](#)), whereby the approach to research is the same for all cases being compared. [Zimmermann et al. \(2023\)](#) distinguish two approaches in this context:

- variation-finding comparison, in which the degree of variation in the cases being compared is determined (with the detection of this variation in fact being a key objective);
- comprehensive comparison, which takes all elements of compared systems into account.

On this occasion, [Zimmermann et al. \(2023\)](#) reflect on the selection of case studies, considering whether it is the most-similar or the most-diverse case studies that are to be chosen. The former approach proves particularly valuable where the comparison involves EU Member States. It is a direction deployed in diverse studies ([Kantor & Savitch, 2005](#); [Janin-Rivolin, 2008](#); [Hantrais, 2009](#); [Altrock et al., 2016](#); [Mell et al., 2017](#); [Berisha et al., 2020](#); [Lukstina et al., 2024](#); [Zimmermann & Feiertag, 2024](#)). There is no doubt that, while EU states are surely partially dissimilar, their individual development may still not be discussed unless some common context is referenced. Conversely, the proper embedding of specific comparisons in theory prevents more-diverse states from being compared ([Zimmermann & Momm, 2022](#)). There is value to both directions in which comparisons can be made; but where cases are mutually differentiated in an inherent way, the direction recommended is that of a more pointed comparison. This reflects the high level of risk characterising any comprehensive comparison of a larger number of mutually-differentiated systems. On the other hand, a holistic comparison of two dissimilar countries may be interesting, though in such an event it will prove difficult to go beyond mere causal conclusions. Then it is indeed necessary to either refer to a particular line of theoretical discussion; or to diagnose broader, more-universal problems. In contrast, when comparing countries that are mutually similar, we can pursue broader analyses, though a risk of simplification is present here too. An example might be comparison of spatial-planning systems in the CEECs. There are indeed many similarities there, but it remains necessary

to recognise the differences and specificities of, say, the Estonian and Latvian systems – as set against the more-generalised background (Nowak et al., 2023). And, depending on the approach taken to the issue under comparison, dissimilarities in other countries may also come to light. Thus, as comparisons between similar countries are made, account must at each stage be taken of the risk of making such simplifications (potentially easier to miss, already when comparing countries and systems that are inherently different).

One possible element to comparisons made is reference to documents (in different systems / countries, etc.). That concept can be understood very broadly – and we must also contend with different terminology in this respect in different countries. Comparison (e.g. of local development strategies in different countries) should also entail a thorough assessing of effectiveness, of the quality of document content, and of underlying intentions (e.g. on the part of public authorities) as the said documents are drawn up (Sykes et al., 2023; Čok et al., 2024). Among other things, such procedures should really recall and emphasise the views of Nadin (2012), whereby differing understanding of the same concepts in different countries is seen to limit comparison. This even concerns such ostensibly core concepts as ‘planning’ and ‘plan’ *per se* (cf. Alterman, 2010). Another limitation noted by the author referred to relates to simplistic perception of the planning families identified in the literature (Nadin & Stead 2008; Elinbaum & Galland, 2016). This is also why it is necessary to concur with theses maintaining that comparisons among diverse countries have to refer to the native language and formulations those countries deploy (Dembski et al., 2021). And, as the determinants of spatial planning gain discussion, it is also necessary to caveat the specificity of the narratives found in different parts of the world (Chen et al., 2021; Blanc & Cotella, 2022; Nowak et al., 2024a).

Thus, as a methodology for making comparisons between spatial-planning systems undergoes development, what emerge as the key aspects are:

- precise definition of the object of comparison, and the latter’s purpose;
- comprehensive identification of possible constraints and risks as comparisons are made.

These guidelines apply to diverse types of comparisons. As indicated above, comparisons may involve a diverse number of cases (objects of comparison) and a diverse range of similarities and differences within the objects of comparison.

All of the issues indicated also apply when comparisons have a legal and institutional context; and indeed the comments apply fully to the perspective related to comparisons with Cohesion Policy objectives. It must be stressed that a holistic comparison of selected characteristics of all EU Member States will prove a major challenge (and of course risk over-simplification). Comparisons would have to be made in several stages involving selected groups of countries first. The subject-matter could extend to both the achievement of specific objectives (related to land-use efficiency, for example) and specific mechanisms and solutions guaranteeing their achievement. In the latter case, both strategic documents and legal solutions are involved, with the latter looking especially relevant where effectiveness and attendant barriers are looked at.

Law and practice in the context of comparisons

As indicated above, institutional issues are among the key factors considered as spatial-planning systems are made subject to comparison. The literature indicates as very important the relationship of institutions to social, economic or cultural conditions (Alterman, 2010; Reimer & Blotevogel, 2012). To a significant extent, the subject area referred to includes comparison of (different states’)

legal conditions as regards spatial planning. However, reference to planning practices is necessary so that comparisons are not rendered too superficial

In general, the work of [Needham et al. \(2018\)](#) is to distinguish between legal approaches to spatial planning based on spatial plans, or else on a planning code. Obviously, those two models indicated are distinguished between as each national system is detailed. [Sykes et al. \(2023\)](#) go into the possible variations, relating both to the content / formulation of spatial plans (legally binding or discretionary), as well as the way in which planning objectives gain definition in law. They identify as a key classification from this perspective the tradition / approach related to specificities of the common-law or civil-law systems. At the same time, they point to the way in which the law is applied being a product of planning culture, including the way society approaches key planning issues. As indicated above, such legal approaches applied universally will not prove sufficient. In systems differing radically, even seemingly-basic concepts may be understood differently; and applied even more differently. However, the risk of major discrepancies does not preclude comparison of certain features of legal instruments. Spatial plans at municipal level may serve as examples ([Nowak et al., 2024b](#)). Despite considerable variation from country to country, attempts can be made to distinguish and compare possible integral parts (e.g. those relating to how plans determine future land use).

A clearly very-important direction as planning law and practice are discussed in comparative terms is the distinction to be drawn between ‘planning families’ ([Newman & Thornley, 2002](#)). The latter authors distinguished between the British, Napoleonic, Germanic, Scandinavian and Eastern European families on a European scale, and then described the characteristics of each. They analysed the specificities of most of the countries falling within each family distinguished, also seeking out the relationships pertaining between spatial-planning law and planning practice. The literature nevertheless indicates that this approach should be developed further, especially in the context of ongoing dynamic change in planning systems ([Nadin et al., 2024](#)).

Via their approach, [Sykes et al. \(2023\)](#) emphasise the specificity of each country’s internal changes (as determined by the planning culture), as well as the consequences of specific legal changes made (in different ways) from one compared country to another. Such themes have been taken up in other studies (like [Blanc & Cotella, 2022](#)). Put differently, the separation of planning families can be thought to offer a good illustration of challenges as regards the methodology of comparisons of spatial-planning systems (including as regards legal conditioning). This is then a good starting point as comparisons are discussed, though proving inadequate for detailed approaches, to the extent that significant deepening or modification in line with subject-matter will need to be applied.

Other means of framing also exist from a European perspective. Thus, [Janin Rivolin \(2008\)](#) has a focus on conforming and performing systems being distinguished. In the former (prevalent in Western Europe), development rights are linked to a strategic view, with strategic planning translating into (legally-binding) zoning. In contrast, under the performing model, development rights are prejudged at a later stage, once spatial plans have been prepared. [Steele and Ruming \(2012\)](#) also relate this classification of systems to other issues, including planning flexibility.

Zoning is a topic in need of special consideration, not least because the notion is understood differently by some systems. However, it can be assumed to mean a defining (in spatial plans) of a particular location, be that residential, commercial or industrial ([Sykes et al., 2023](#)). However, the defining of development parameters (e.g. maximum height) is also at times considered part of zoning – and zoning understood in that way denotes a broad comparative basis concerning both the extent of public-authority interference in planning (where zoning curtails a given property’s

possibilities to develop), and spatial conflicts – which may link up with court challenges to specific spatial decisions or instruments. These types of approach can also be contrasted with discretionary regimes, where planning guidelines are not legally binding, but rather the subject of discussion and negotiation. From diverse studies ([Cordes, 1989](#); [Dembski & O'Brien, 2020](#)) we can note how particular dilemmas arise in relation to zoning approaches taken within conformative and performative systems. Neither case precludes instances of mutual borrowing.

Another important issue (in need of broader treatment in the literature) concerns the comparison of legal change in spatial-planning systems. This is a separate direction of comparison, not always covered adequately in discussions on spatial planning. However, publications addressing this topic can be identified ([Roodbol-Mekkes & van den Brink, 2015](#); [Nadin et al., 2024](#); [Nowak et al., 2024b](#)). There is no doubt that changes in spatial-planning systems are a key condition if these systems are to be understood ([Nadin et al., 2024](#)). Undoubtedly, changes in spatial-planning law are integral to the change in question, which can nevertheless prove diverse. For example, comprehensive changes to existing laws can be distinguished (the principle being that a new law replaces an old one in force previously), or else partial changes to existing laws (as existing law remains in force, with only some provisions changed). Depending on the specific case (and on which provisions are in fact amended), amendments in the two categories may have differential effects on the spatial-planning system as a whole.

It is also worth noting the varied, detailed approaches to planning practice to be noted as spatial-planning systems are compared. In this approach, [Stead et al. \(2015\)](#) examine changes in those systems, as well as their relationship to the specificity of planning cultures. [Booth \(2011\)](#) drew attention to the cultural embeddedness of the countries studied. [Knieling and Othengrafen \(2009, 2015\)](#) offer detailed analysis of the context to the planning cultures of compared countries (also in EU terms), for example referring to the ‘culturised planning model’ or ‘societal environment’. [Nowak et al. \(2024c\)](#) attempt to identify what shared or distinguishing values are reflected in the spatial planning law of the CEECs (with this also related directly to the planning-culture context). [Nadin \(2012\)](#) noted how the identification of planning cultures allows for comparison of, not static, but dynamically-framed planning styles. A similar research approach is advocated by [Stead and Cotella \(2011\)](#) and [Davoudi et al. \(2012\)](#). The research conducted by [Dembski et al. \(2021\)](#) reveals different socio-economic, political and cultural conditions for the UK, French and German systems. Relationships between the different levels of government (especially central and local) also remain important differentiating factors.

It thus proves hard to compare the legal conditions underpinning spatial planning in different systems. A key element to any such comparison must be identification of how legal solutions can translate into planning practice (optimally, as aligned with a discussion of planning culture). At the same time, it must be stressed that, while a good starting point for discussion may be offered by the literature’s attempts to offer broader categorisations of types of spatial-planning system (with legal considerations also taken on board), a significant further deepening and detailing is obviously required.

The principles and barriers presented as spatial-planning law is being compared prove of direct relevance as the implementation of Cohesion Policy objectives is addressed. Such comparisons must take the diversity of EU States into account – from the perspective of both the separate planning families and the (zoning/urban code) solutions applied. Despite differences in individual countries’ systems, consideration of the legal aspects of planning also offers a basis for the identification of key and common mechanisms and legal frameworks. These relate primarily to the content of spatial plans at the local level: their guidelines and consequences. Consideration of the role

of spatial plans would seem to be a key direction as the pursuit of Cohesion Policy objectives at local level is addressed. The comparison of both legal regulations *per se*, and of the ways in which they gain application, should be understood in this context (which should be emphasised once again as being particularly relevant).

Conclusions

This paper presents the key challenges encountered as spatial-planning systems are compared. The reasons for engaging in such comparison prove varied, but can be boiled down to justifications relating to the needs of practice on the one hand, or theoretical discussion on the other (though the two groups of justifications are interdependent, with both associated with potential research limitations). The legal context for making comparisons is particularly important. The diversity of legal conditions in countries being compared seems important, but simplifications pose a risk as such comparisons are made. These may arise from failures to consider the social, cultural, economic or political contexts of the countries being compared. Simplifications may also result from overly-broad, highly-generalised classifications of spatial-planning systems. There is no doubt that all the issues identified above are apposite when it comes to issues of territorial cohesion. Objectives relevant to that, at both the more-general and more-specific levels, relate significantly to matters of spatial planning. The very act of referring such objectives to a large number of countries (EU Member States) provokes comparisons. In this context, a key barrier lies in the legal and institutional diversity of spatial planning in those different states. This diversity may be thought to hinder the wider implementation of territorial cohesion objectives. Numerous examples of impediments can be given. As noted above, Cohesion Policy objectives and guidelines contained in European documents should translate into specific spatial solutions at national level. However, differently-formulated spatial priorities combine with differently-constructed planning tools (e.g. spatial plans) to hinder the cohesive pursuit of objectives. Different national systems may have completely different rules when it comes to development being limited or prohibited (sometimes in plans, sometimes on the basis of administrative decisions or urban-planning code). Further differences may lie in the integration into planning tools of guidelines relating to climate adaptation and mitigation, and nature conservation. Sometimes this requires the development of separate, sectoral spatial tools. The way in which individual prohibitions and restrictions are enforced also remains a differentiating factor. This is why the experience of previous comparisons of spatial-planning systems seems so valuable in the context under consideration.

Literature analysis allows us to conclude that any comprehensive compilation of characteristics of EU States' spatial-planning systems proves a major challenge, and faces the constant risk of over-simplification. On the one hand, the current key basis for discussion is a COMPASS report (Nadin et al., 2018) whose results need regular revision, followed by attendant change in national systems. On the other hand, from the perspective of this paper's search for spatial-planning responses to Cohesion Policy challenges, it is the following conclusions that need indicating:

- The answer to the challenges of territorial cohesion is less to be found in the specific legal formulations of spatial-planning instruments (as these can vary from country to country). The key in this context is to consider the effectiveness of specific instruments in a given country. Equally important is the effectiveness of instruments at national, regional and local level (each of the indicated groups of instrument has its specificities). It may be particularly necessary to verify whether particular types of instrument are not replaced in specific cases by others

(thereby distorting the objectives associated with the main instruments), or remain unrealised altogether. Other forms of abuse may also be found.

- Comparisons of spatial-planning systems relevant for the purposes of territorial cohesion policy should be engaged in, so that answers to problems across the EU are arrived at. This means that the defining of a specific problem (of importance from the point of view of an objective of territorial cohesion objective) should be followed by a definition of possible differences and similarities related to this problem, from one EU Member State to another. A next step should be to relate problems identified with the institutional and legal spheres in the countries under study (including the above-mentioned effectiveness of spatial planning instruments).

The above recommendations should be considered relevant and necessary from the perspective of the objectives of territorial cohesion being achieved. Thus, for example, those spatial objectives relating to territorial cohesion as are included in the Territorial Agenda 2030, can in this way gain points of reference with the institutional and legal conditions pertaining to individual Member States. There can be no doubt as to the need for the two strands indicated here to be brought together. This article thus offers a proposal by which this connection can be noted, and relates it to the specifics of comparative research. There is equally no doubt as to the fact that further directions to research should include detailed analysis of the spatially-related objectives of territorial cohesion, as well as their specificities.

The analysis detailed here makes quite clear the caution needed as any comparisons of the spatial determinants to Cohesion Policy objectives are made. Comparisons that are too general and / or hasty may suffer from oversimplification, and will be straightforwardly counter-productive for that reason. It thus seems crucial for strategic documents and legal regulations to be subjects of comparison (also in terms of the way they gain application in planning practice). This may denote and require an internal classification of EU Member States, as well as comparisons relating to specific issues / instruments across groups of countries. In this way, a process of clarification as to scope and possibilities can be followed by a further process in which objectives in EU documents (even those formulated in a more-general way only) can be related to specific categories of spatial-planning tool. In that connection, it can be seen as useful and pertinent for both broader study (e.g. at ESPON level) and smaller-scale comparisons to be engaged in, within the framework of the scientific activity of representatives of individual EU Member States.

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