



The evolution of spatial planning in South Africa: A comparative study

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ABSTRACT

After the end of apartheid in 1994, South Africa began to reform its spatial planning practices to address the apartheid legacy while promoting social justice, economic development, and spatial integration (Moyo *et al.*, 2021). To counteract the spatial disparities resulting from apartheid legislation, various new planning legislation and policies were introduced at the national, provincial, and municipal levels (Berrisford, 2011). Additionally, South Africa's spatial planning practices have evolved significantly over the last three decades. Understanding the evolution of these practices is essential for assessing their impact on stakeholders and identifying areas that require improvement.

However, South African Planners can learn not only from their own spatial planning mistakes, but also from those of other countries experiencing challenges in legislative transformation. Therefore, comparing South Africa's current spatial planning practices with those of other countries provides valuable insight into their effectiveness. This study examines the development of South Africa's post-apartheid spatial planning over the past thirty years in response to widespread spatial inequalities. It assesses how current planning practices address sustainability, equity, and rural and urban development by critically analysing the legacy of apartheid-era planning.

By comparing South Africa's planning practices with those of selected developed countries, such as Australia, the Netherlands, and Canada, as well as developing countries like Brazil, India, and Morocco, best practices and lessons learnt can be identified. This study aims to support the development of more efficient, inclusive, and responsive spatial planning by placing South Africa's planning experience within a global comparative framework. Planners, legislators, and academics seeking to address persistent spatial imbalances and promote sustainable, equitable development in transitional contexts can benefit from this study's findings.

Key terms:

Planning theory; spatial planning; developed and developing countries; post-apartheid South Africa; planning legislation and policy; sustainable development; urban and rural equity

OPSOMMING

Na die einde van apartheid in 1994 het Suid-Afrika begin om sy ruimtelike beplanningspraktyke te hervorm om die apartheid-nalatenskap aan te spreek terwyl sosiale geregtigheid, ekonomiese ontwikkeling en ruimtelike integrasie bevorder word (Moyo *et al.*, 2021). Om die ruimtelike ongelykhede wat voortspruit uit apartheidswetgewing teen te werk, is verskeie nuwe beplanningswetgewing en -beleide op nasionale, provinsiale en munisipale vlak ingestel (Berrisford, 2011). Daarbenewens het Suid-Afrika se ruimtelike beplanningspraktyke die afgelope drie dekades aansienlik ontwikkel. Om die evolusie van hierdie praktyke te verstaan, is noodsaaklik om hul impak op belanghebbendes te bepaal en om areas te identifiseer wat verbetering benodig.

Suid-Afrikaanse beplanners kan egter nie net leer uit hul eie ruimtelike beplanningsfoute nie, maar ook uit dié wat deur ander lande gemaak word wat uitdagings in wetgewingstransformasie ervaar. Daarom bied die vergelyking van Suid-Afrika se huidige ruimtelike beplanningspraktyke met dié van ander lande waardevolle insig in hul doeltreffendheid. Hierdie studie ondersoek die ontwikkeling van Suid-Afrika se post-apartheid ruimtelike beplanning oor die afgelope dertig jaar in reaksie op wydverspreide ruimtelike ongelykhede. Dit beoordeel hoe huidige beplanningspraktyke volhoubaarheid, billikheid en landelike en stedelike ontwikkeling aanspreek deur die nalatenskap van beplanning uit die apartheidstydperk krities te analiseer.

Deur Suid-Afrika se beplanningspraktyke te vergelyk met dié van geselekteerde ontwikkelde lande, soos Australië, Nederland en Kanada, sowel as ontwikkelende lande soos Brasilië, Indië en Marokko, kan beste praktyke en lesse wat geleer is, geïdentifiseer word. Hierdie studie het ten doel om die ontwikkeling van meer doeltreffende, inklusiewe en responsiewe ruimtelike beplanning te ondersteun deur Suid-Afrika se beplanningservaring binne 'n globale vergelykende raamwerk te plaas. Beplanners, wetgewers en akademici wat volgehoue ruimtelike wanbalanse wil aanspreek en volhoubare, billike ontwikkeling in oorgangskontekste wil bevorder, kan baat vind by hierdie studie se bevindinge.

Sleuteltermes

Beplanningsteorie; ruimtelike beplanning; ontwikkelde en ontwikkelende lande; post-apartheid Suid-Afrika; beplanningswetgewing en -beleid; volhoubare ontwikkeling; stedelike en landelike billikheid.

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SECTION 1 CONTEXTUALISATION

This section aims to orient the reader by providing an overview of the research topic (Chapter 1) and outlining the research methodology to be used in the study (Chapter 2).

CHAPTER 1 INTRODUCTION

1.1 Introduction: Research Orientation

“Planning is not about producing plans, but about shaping the process through which places are governed and developed.” (Healey, 2003)

Regulations that govern land use and development, specifying permissible and impermissible activities, are commonly referred to as the ‘*planning system*’ (Oakenfull, 2021). Therefore, urban planning and development operate within this framework. To emphasise that the primary focus of planning systems is the effective organisation of physical space and the coordination of activities within it, the discipline is known as *spatial planning*, also referred to as *physical planning* (Larsson, 2006).

The term ‘*town planning*’, referring only to urban land-use regulation, was initially introduced in South Africa (Mokoena & Sebola, 2020). Over time, planning in South Africa expanded to include regional and national planning, leading to the development of more precise terminology, such as *physical planning* and, later, *spatial planning* (Oakenfull, 2021). The role of planning has shifted from overseeing implementation and setting broad policy objectives to actively engaging with communities and supporting local investment decisions (Morphet, 2010). As a result, planning and development policies are often the subject of discussion because they provide only a broad framework and guidelines for development decisions (Oakenfull, 2021).

Furthermore, planning legislation is considered essential, as government regulation can be effectively enforced only through the creation of rules and regulations (Berrisford, 2011). Although social, economic, and environmental factors significantly influence spatial planning, they seldom attempt to organise the spatial dimension in accordance with appropriate and structured principles (Larsson, 2006). Consequently, urban development across social, economic, and environmental dimensions is profoundly influenced by spatial planning (Larsson, 2006). Therefore, a complex network of interrelationships exists between spatial planning and related sectors, and comprehensive planning processes must explicitly account for these multidimensional interactions (Mokoena & Sebola, 2020).

Planning practices during the apartheid era in South Africa were deliberately used to sustain racial segregation, unequal access to land, and fragmented urban development (Mokoena *et al.*, 2019). Since the end of apartheid, South Africa's planning system has undergone significant transformations (Berrisford, 2011). Nevertheless, the spatial configurations from the apartheid era remain firmly established and continue to influence contemporary development outcomes (Maharaj, 2020). Although extensive research on spatial planning inequalities in South Africa has been conducted by scholars such as Turok (2010) and Todes (2008:2012), these persistent challenges raise critical questions regarding the effectiveness of current spatial planning practices. They also highlight the need to draw comparative insights from international experiences to inform and potentially improve South Africa's planning approaches (Waldeck *et al.*, 2020).

1.2 Problem Statement

Following the end of apartheid in 1994, South Africa began reforming its spatial planning practices to address the apartheid legacy and promote social justice, economic development, and spatial integration (Moyo *et al.*, 2021). To counteract the spatial disparities resulting from apartheid legislation, new planning legislation and policies were introduced at the national, provincial, and municipal levels (Berrisford, 2011). The *Constitution of the Republic of South Africa* (1996) and the *Spatial Planning and Land Use Management Act (SPLUMA)*, 2013) (Nel, 2016), which aim to establish a consistent, inclusive, and progressive planning framework across all levels of government, serve as important milestones (Mokoena *et al.*, 2019).

South Africa, however, remains confronted by ongoing spatial challenges despite numerous reforms. These include urban sprawl, informal settlements, socio-economic segregation, and disparities between urban and rural regions (Maharaj, 2020). Consequently, legislative changes can significantly affect sustainability, equity, and urban and rural development, and research on these impacts can improve understanding of how different practices influence spatial planning and inform future decisions (Berrisford, 2011). According to Waldeck *et al.* (2020), South Africa's spatial planning practices have evolved significantly over the last three decades. Understanding this evolution is crucial for assessing their impact on stakeholders and identifying areas for improvement.

However, South African planners can learn not only from their own spatial planning mistakes but also from those of other countries facing challenges in legislative reform. Comparing South Africa's current spatial planning practices with those of other countries provides valuable insight into their effectiveness (OECD & Lincoln Institute of Land Policy, 2022). Nevertheless, an analysis of planning systems in both developed and developing countries will facilitate a more precise

identification of context-specific challenges, transferable best practices, and diverse planning strategies. This will support the creation of more effective initiatives to reform spatial planning, thereby shaping its future in South Africa.

This study aims to address significant gaps in the existing literature, as there is limited research on the evolution of South Africa's spatial planning practices and their impact on development in post-apartheid South Africa (Mokoena & Sebola, 2020). Although some literature has explored how South Africa's current spatial planning practices compare internationally, there remains a lack of systematic research comparing South Africa's current practices with those of both developed and developing countries, thereby limiting our knowledge of the subject. Given South Africa's persistent difficulties over the past 30 years in achieving the Sustainable Development Goals, fostering inclusive growth, and redressing past injustices, this study is especially relevant and timely. The research questions that will guide this study are as follows:

- How have South Africa's spatial planning practices evolved since the end of apartheid?
- How do South Africa's current spatial planning practices compare with those of developed and developing countries, with a focus on the impacts of different practices on sustainability, equity, and urban and rural development?

1.3 Research Aims and Objectives

The primary aim of this study is to examine the evolution of South Africa's spatial planning practices and to compare South Africa's current practices with those of developed and developing countries. The objectives of this study are:

- (i) To analyse the impact of different practices on sustainability, equity, and urban and rural development,
- (ii) To identify opportunities and best practices from case studies,
- (iii) To provide evidence-based recommendations to improve the effectiveness of South Africa's spatial planning practices, and
- (iv) To contribute to the literature to enhance understanding of the dynamics of land use and spatial planning in South Africa.

1.4 Hypothesis

Given South Africa's complex history of spatial disparities and economic inequalities, it is expected that post-apartheid spatial planning policies will be shaped by political, economic, and social factors to address past injustices, with a focus on sustainability, equity, and urban and rural development. It is hypothesised that a comparative study of developed and developing countries

will reveal opportunities and lessons for the future of South Africa's spatial planning practices, yielding valuable knowledge to inform future reforms. Figure 1.1 presents an overview of the study's research framework.

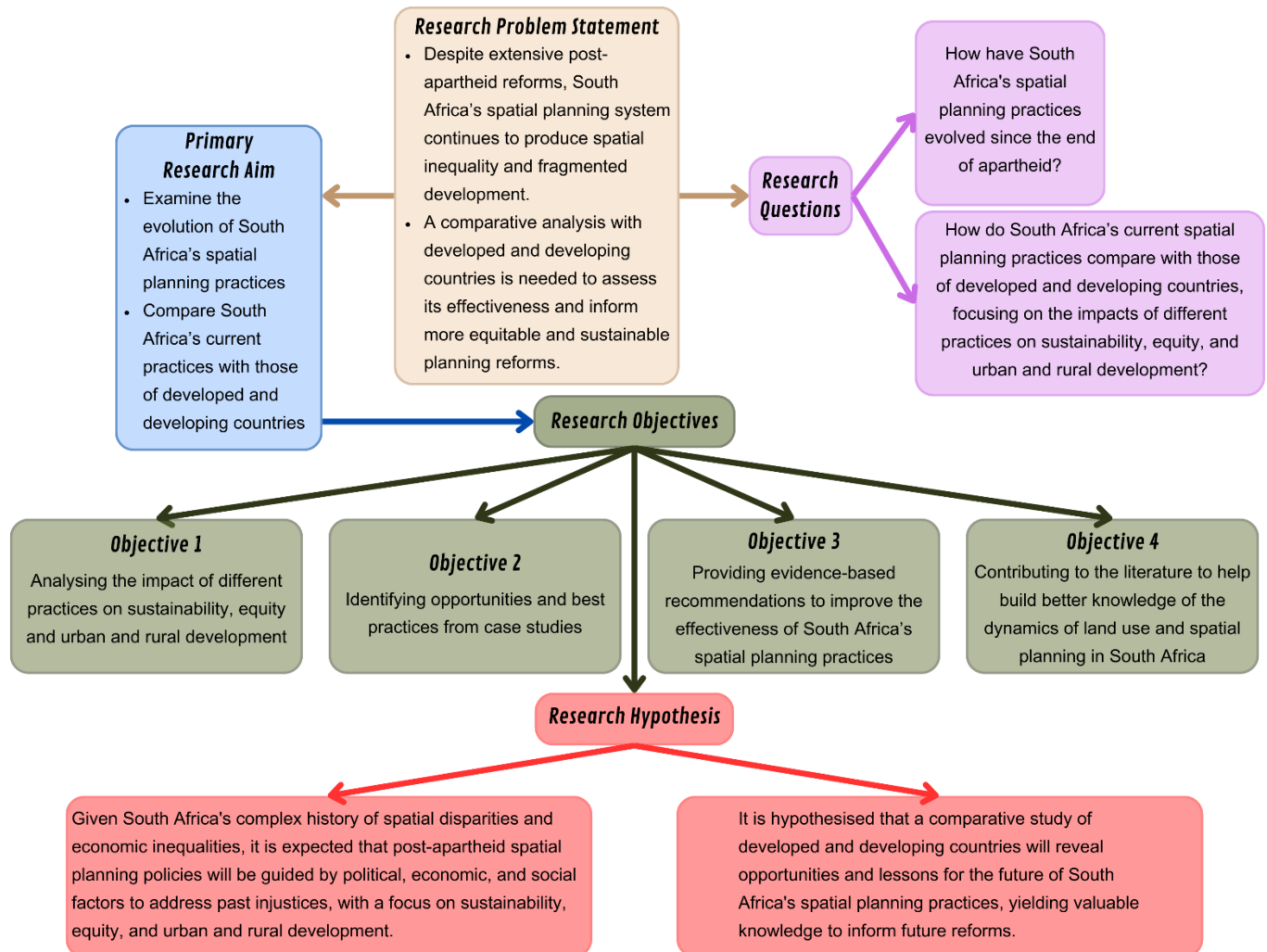


Figure 1.1: Research Framework

Source: Own construction

1.5 Research Methodology

Chapter 2 will offer a more detailed discussion of the research methodology.

• Literature Study

The literature review will comprise both a systematic review and a comparative analysis (Silva *et al.*, 2015). During the systematic review, the researcher will examine the evolution of spatial planning practices from an international perspective (Mengist *et al.*, 2020). The comparative

analysis will enable the researcher to compare South Africa's current spatial planning practices with those of both developed and developing countries (Mengist *et al.*, 2020).

- **Empirical Study**

During the empirical investigation, an exploratory sequential mixed-methods approach will be used, integrating qualitative and quantitative data across the distinct phases of the research process (Creswell, 2021). The research design guiding this study comprises case studies, comparative analyses, and historical analyses. Post-apartheid South Africa will serve as the applied research context for examining how various practices influence sustainability, equity, and urban and rural development. The purpose of the research will be formative in nature, with the goal of informing practice through policy analysis (du Toit, 2015). The methodological paradigm will be pragmatic, enabling the solution of real-world problems while prioritising relevance (du Toit, 2015). Data generation methods used in this study include document and thematic analyses (Dawadi *et al.*, 2021).

1.6 Chapter Division

- Chapter 1: Introduction

This chapter presents an introduction, problem statement, research aims and objectives, hypothesis, research methodology, and chapter divisions, providing a comprehensive overview of the study's focus.

- Chapter 2: Research Methodology

A comprehensive explanation of the research methodology for this study is provided. This chapter outlines the research context, purpose, paradigm, approach, methodological framework, and research design.

- Chapter 3: Planning Perspectives

This chapter serves as the opening chapter of the literature review, focusing on planning perspectives. A distinction is drawn between *planning theory* and *theory in planning*. The first section will examine planning theory to explain how planning should be executed, and the subsequent section will analyse theory in planning to understand the planning process.

- Chapter 4: Spatial Planning

The concluding chapter of the literature review will explore the fundamentals of spatial planning and clarify the distinction between strategic and statutory planning as key elements. The first section will focus on strategic planning, while the second will examine statutory planning.

Together, they explain where we aim to go and how we plan to get there. The subsections will thoroughly assess each aspect of spatial planning.

- Chapter 5: Spatial Planning in Developed Countries

The first chapter of the empirical investigation will analyse the spatial planning systems of developed countries, with particular attention to specific case studies. This chapter will review general information on these countries, their administrative and planning structures, and the planning legislation and spatial planning frameworks in place. Additionally, implementation challenges will be examined, and the developed countries will be compared.

- Chapter 6: Spatial Planning in Developing Countries

The second chapter of the empirical investigation will analyse the spatial planning systems of developing countries, with particular attention to specific case studies. This chapter will review general information on these countries, their administrative and planning structures, and the planning legislation and spatial planning frameworks in place. Additionally, implementation challenges will be examined, and the developing countries will be compared.

- Chapter 7: Spatial Planning in South Africa

The third chapter of the empirical investigation will examine the spatial planning systems in South Africa, focusing on the development of planning practices since the end of apartheid in 1994. The chapter will begin by outlining pre-1994 planning to provide historical context. The second part will analyse post-1994 planning in South Africa and the influence of legislative and policy reforms on sustainability, spatial equity, and urban and rural development.

- Chapter 8: Synthesis and Recommendations

The theoretical insights from Chapters 3 and 4, together with the empirical evidence from Chapters 5, 6, and 7, will be integrated to delineate key themes. This synthesis will present the study's overarching conclusions. Furthermore, evidence-based recommendations, informed by best practices and lessons from the comparative analysis, will be provided to influence the future trajectory of spatial planning in South Africa.

Figure 1.2 illustrates the study's structural framework.

The evolution of spatial planning in South Africa: A comparative study

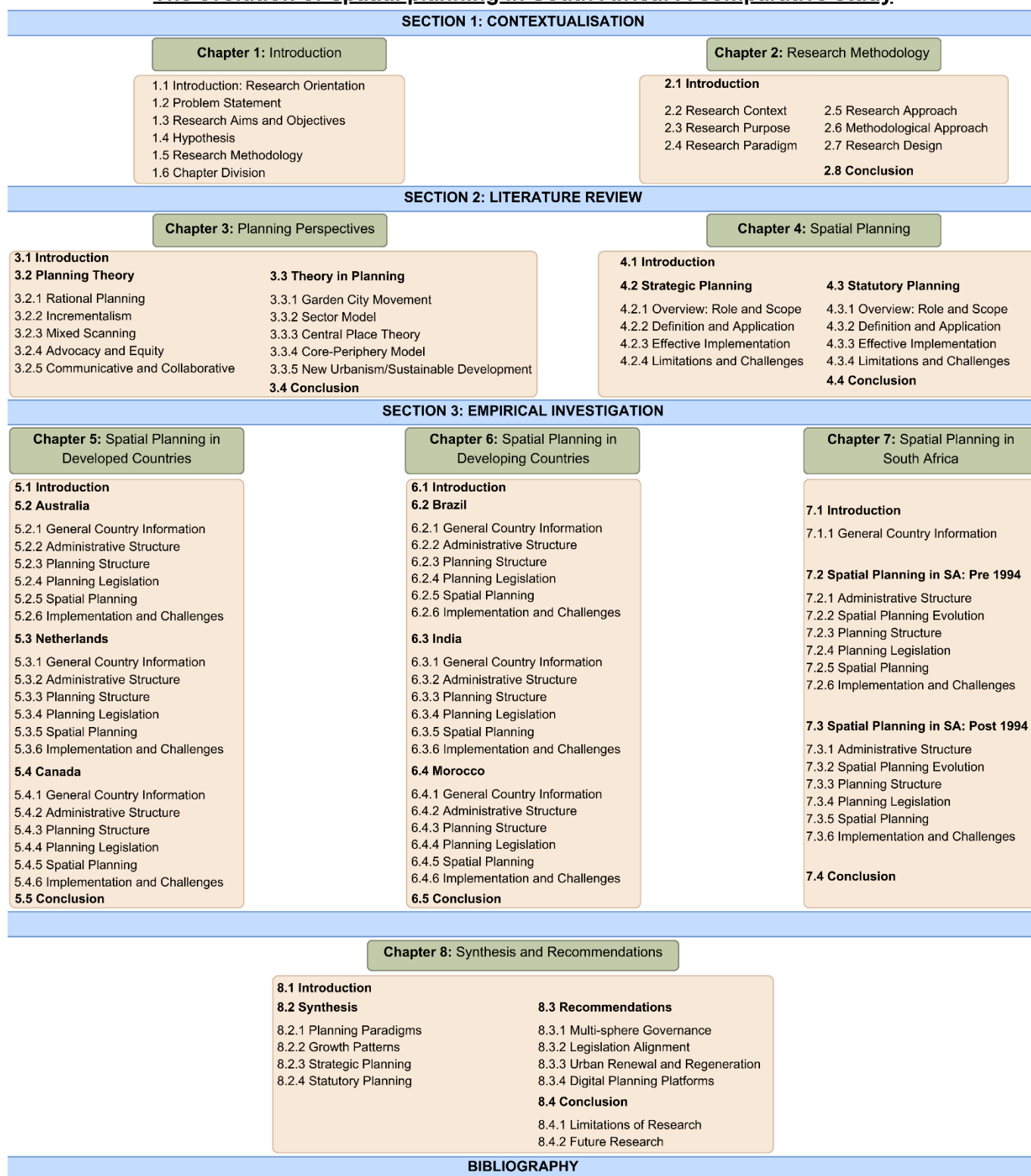


Figure 1.2: Structural Framework of the Study

Source: Own construction

CHAPTER 2 RESEARCH METHODOLOGY

2.1 Introduction

A research methodology provides a systematic framework for addressing research questions, encompassing methods and data analysis (Silva *et al.*, 2015). It promotes cross-sector knowledge sharing by ensuring that research outcomes are dependable and effectively communicated (Nadin & Stead, 2013). Critical steps include identifying the problem, selecting suitable methodologies, collecting data, and evaluating findings (Silva *et al.*, 2015). To enhance relevance and applicability, researchers must also understand the underlying assumptions of their chosen methods.

This chapter will outline the research methodology used in this study. The following sections will cover (i) the research context, (ii) the research purpose, (iii) the research paradigm, (iv) the research approach, (v) the methodological approach, and (vi) the research design. Figure 2.1 presents a visual overview of the chapter's structural framework.

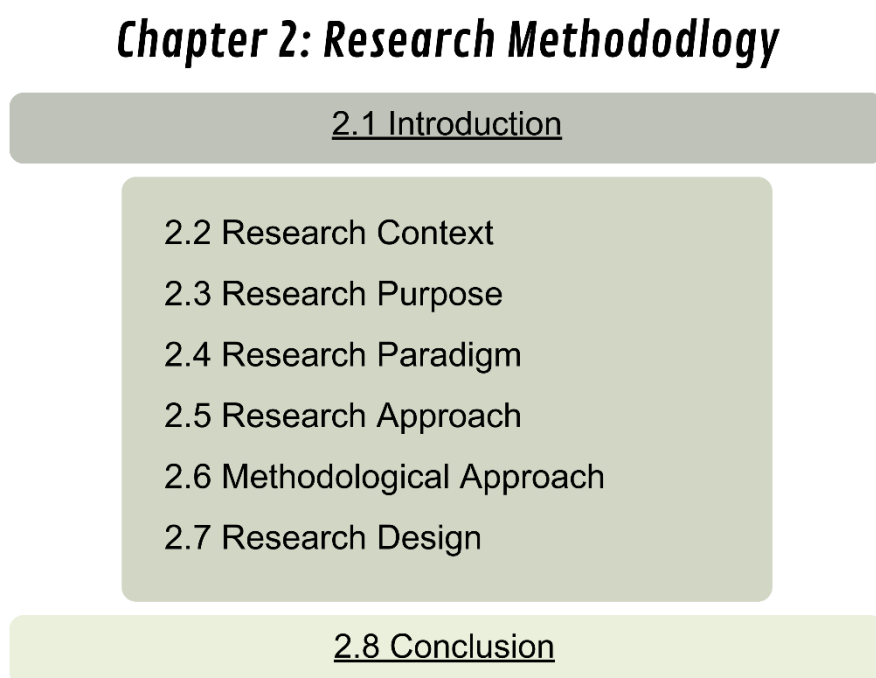


Figure 2.1: Structural Framework of Chapter 2

Source: Own construction

2.2 Research Context

The broader environment in which a study takes place is known as the research context. It explains the study problem's location, timing, purpose, and circumstances (Svensson, 2021). In this study, post-apartheid South Africa will serve as the applied research context for investigating the impact of diverse planning practices on sustainability, equity, and urban and rural development.

The effectiveness of spatial planning and land-use management systems in post-apartheid South Africa will be analysed from an international comparative perspective. The research will focus on planning frameworks at the national, provincial, and municipal levels in South Africa. Additionally, the influence and role of national, provincial, and municipal governments on spatial planning practices will be examined. Therefore, the study employs a range of spatial scales that reflect South Africa's hierarchical yet interconnected planning system (Gitlin & Russell, 2014).

The research context has been significantly shaped by apartheid-era spatial planning, resulting in dispersed cities, peripheral settlements, and spatial inequality (Moyo *et al.*, 2021). The study is set in democratic South Africa, a period when planning legislation and policies were amended and new legislation was introduced to enhance spatial equity (Moyo *et al.*, 2021). Therefore, the period following 1994 (democracy) will be the primary focus of analysis, while the era preceding 1994 (apartheid) will be briefly discussed to provide political background.

The *Constitution of the Republic of South Africa* (1996), key planning legislation such as the *Spatial Planning and Land Use Management Act* (2013) and the *Municipal Fiscal Powers and Functions Amendment Act* (2024), and planning frameworks such as the *National Development Plan* (2012) and the *National Spatial Development Framework* (2022) will serve as fundamental sources. The prevailing statutory planning framework in South Africa is characterised by local authority and autonomy, conflicts between strategic and statutory planning, and intergovernmental governance (Berrisford, 2011).

Circumstances that directly influence the planning practices of South Africa and the implementation of spatial planning include: (i) rapid urbanisation, which causes urban sprawl and informal settlements, (ii) unemployment, which leads to poverty and homelessness, (iii) high levels of spatial and social inequality, (iv) service delivery backlogs in both urban and rural areas, and (v) competing interests between spatial development and environmental management (Maharaj, 2020).

Furthermore, the research context extends beyond South Africa to include a comparative analysis of the spatial planning and land-use management systems of both developed and developing countries (see Case Study Design in Section 2.7). The planning practices of these countries will be evaluated for their potential applicability within South Africa's distinctive socio-spatial and governance framework. Best practices from both developed and developing countries will be identified to inform an evaluation of South Africa's spatial planning context.

2.3 Research Purpose

The research purpose defines the study's objectives and the reasons for its investigation, thereby linking the research question to the research problem. It also describes the study's aims within the research context (Patel & Patel, 2019). It sets out the expected outcomes and, in this case, explains how it will improve planning efficiency, guide future reforms, and identify best practices. Additionally, it reflects the normative objectives the research aims to achieve in the field, such as spatial equity and sustainable development (Snyder, 2019).

Therefore, the purpose of this study is to examine planning practices in South Africa since the end of apartheid in 1994, with a specific focus on the country's spatial planning and land-use management systems. The investigation will examine changes in governance structures, planning legislation, and policies to assess their impact on sustainability, equity, and development. Furthermore, the study will compare South Africa's existing planning practices with those of both developed and developing countries. This comparison aims to identify best practices and lessons learned, thereby informing evidence-based recommendations for future planning reforms. Furthermore, the research will be exploratory and formative, aiming to inform practice through policy analysis (du Toit, 2015).

2.4 Research Paradigm

A research paradigm is the philosophical perspective that guides a researcher's understanding of reality, the generation of knowledge, and the selection of techniques. According to Kuhn (1962), research philosophy encompasses a comprehensive philosophical perspective on the nature of social phenomena and social systems, as well as a well-established model or pattern that serves as an organisational framework. Research philosophy delineates the foundational assumptions that underpin every investigation (Phair & Warren, 2021). Research paradigms are employed in spatial planning to explain mechanisms of authority, the evolution of planning systems over time, and the reasons for variations in planning practices across contexts (Mbanaso *et al.*, 2023).

Research paradigms commonly used in spatial planning research include:

- (i) *Positivism* is a scientific method of investigation that identifies the causes and effects of various events. Since this paradigm interprets observations through facts and measurable elements, it is frequently adopted as a research worldview (Mbanaso *et al.*, 2023). According to positivism, research is grounded in the formulation of hypotheses, the testing of concepts, and the presentation of suggestions and conclusions. Nevertheless, this paradigm struggles to capture the intricacies of social, political, and institutional dynamics, rendering it inappropriate for this study (Kivunja & Kuyini, 2017).
- (ii) *Interpretivism* holds that subjective interpretation and intervention are the only means to achieve a thorough understanding of reality. This paradigm aims to understand the subjective world of the social sciences (Phair & Warren, 2021). Its aim is to understand the subject's perspective rather than the researcher's, emphasising how an individual thinks and perceives specific concepts. Furthermore, this research paradigm excels in policy analysis and planning theory (Mbanaso *et al.*, 2023).
- (iii) *Critical realism* is a discipline that focuses on social issues and seeks to address social, political, and economic concerns (Mbanaso *et al.*, 2023). Through participatory research, this paradigm aims to improve spatial fairness, address social injustice, and foster political change. Nevertheless, political conflicts often stem from these spatial challenges, thereby rendering this paradigm inappropriate for this study (Kivunja & Kuyini, 2017).
- (iv) *Pragmatism* involves making practical decisions based on the most suitable options to solve research problems. This paradigm enables researchers to conduct empirical and theoretical studies in a methodologically rigorous and adaptable manner, thereby supporting the systematic resolution of complex research questions and challenges (Phair & Warren, 2021). Therefore, pragmatism encompasses various hybrid methodological approaches to the study of human behaviour and facilitates researchers in establishing contextually relevant connections to fulfil the specific objectives of the investigation (Kivunja & Kuyini, 2017). This paradigm enables the integration of quantitative and qualitative methods, helping researchers interpret empirical reality more thoroughly and systematically.

Accordingly, the research paradigm for this study will be pragmatism, guided by an interpretive and critical perspective that enables the solution of real-world problems while emphasising relevance (du Toit, 2015). Data generation methods employed in this study include document and thematic analyses. Data will be collected from statistical data, government reports, case studies, scholarly articles, and policy and legislative documents to identify lessons learned and opportunities for policy adaptation. The literature review will encompass a systematic review, while the empirical study shall comprise both a systematic review and a comparative analysis (du

Toit, 2015). During the systematic review, the researcher will analyse the evolution of spatial planning practices from an international perspective (Mengist *et al.*, 2020). The comparative analysis will examine South Africa's current spatial planning practices in relation to those of both developed and developing countries (Mengist *et al.*, 2020).

2.5 Research Approach

The relationship between theoretical frameworks and empirical data is explicitly articulated in the research approach, which clarifies the methodology for generating knowledge (Soiferman, 2010). The following research approaches are considered:

- (i) A *deductive research approach* begins with a hypothesis and uses research to either validate or invalidate it. Therefore, the objective of a deductive research approach is to empirically evaluate a theory (Phair & Warren, 2021).
- (ii) Conversely, an *inductive research approach* entails formulating predictions about new situations based on previously collected data. The primary aim of this methodology is to develop a hypothesis rather than to begin with a pre-existing theory (Soiferman, 2010).
- (iii) An *abductive research approach*, in contrast to deductive and inductive methods, can be used to understand, develop, or modify a condition. This methodology is pivotal in advancing the social sciences through a systematic process of combining academic research (Van Hulst & Visser, 2025).

Therefore, this study will adopt an abductive research approach. The analytical perspective of this study is informed by existing spatial planning theories and concepts. Context-specific patterns and insights will be identified from empirical evidence drawn from planning legislation, policy frameworks, and comparative case studies. Furthermore, explanations of the development and application of planning practices in South Africa, compared with those in certain developed and developing countries, can be enhanced through an iterative process that links empirical data and theoretical frameworks.

2.6 Methodological Approach

The overarching framework that guides the collection, analysis, and interpretation of data to address research questions is known as the methodological research approach (Patton, 1990). A quantitative approach provides an objective assessment of reality, whereas a qualitative approach helps researchers explore and gain a deeper understanding of the phenomenon's complexity (Steckler *et al.*, 1992). Nevertheless, numerous scholars and researchers across

various disciplines are increasingly adopting an integrated approach that combines quantitative and qualitative methods, thereby using mixed-methods research (Steckler *et al.*, 1992):

Consequently, this study will employ a sequential mixed-methods approach, integrating quantitative and qualitative data across the various phases of the research process and emphasising qualitative characteristics (Creswell, 2021). This will enable the researcher to document legislative and policy changes in planning systems, assess measurable planning outcomes, such as governance capacity and development trends, and enhance the study's validity by referencing multiple sources (Dandekar, 2019). The study will use both quantitative and qualitative methodological approaches as outlined below:

- (i) *Qualitative research* will form the foundation of the study and encompass the initial phase. This will entail conducting a systematic review of the existing literature, examining institutional, governance, and planning frameworks, analysing planning legislation and policies, and comparing case studies from both developed and developing countries, including South Africa (Zeisel, 2006). This will enable the researcher to identify themes, trends, and guidelines, and to explain the evolution of spatial planning in South Africa (Gaber, 2020).
- (ii) *Quantitative research* will complement the qualitative findings and serve as a supportive phase, thereby reinforcing and expanding the study (Wang & Vom Hofe, 2007). This includes utilising secondary data, such as development indicators, to support comparative analysis across different planning contexts and countries (Klosterman, 1990). Therefore, the quantitative research will enhance comparability and objectivity without replacing the findings of the qualitative research.

Additionally, this study is based on desktop analysis of publicly available data and documents and therefore does not involve human participants or sensitive information. As such, no ethical risks were identified, and ethical clearance was obtained, with the study classified as a “no-risk” study (Ethics Number: NWU-01343-24-A9).

2.7 Research Design

The overarching logical framework, or blueprint, that delineates how a study is organised to address its research questions, is known as a research design. The research design guiding this study comprises historical, case study, and comparative analyses (Du Toit & Mouton, 2013).

The data generation methodologies employed in this study include document and thematic analyses. Data will be collected from statistical sources, government reports, case studies,

scholarly articles, and policy and legislative documents to identify lessons learned and opportunities for policy adaptation. This approach will support the researcher in providing valuable recommendations for future spatial planning policies (Dawadi *et al.*, 2021).

- **Historical Design**

To understand the evolution of contemporary circumstances and systems, a historical research design is used to analyse past events, legislation, and institutional changes (Du Toit & Mouton, 2013). This study adopts a historical approach to examine how previous planning decisions have consistently influenced current spatial arrangements and planning challenges. It documents the evolution of planning legislation and policy frameworks in South Africa, tracing developments from the apartheid era (1948–1994) to the post-apartheid period, which commenced in 1994 and continues to the present (Creswell, 2009).

- **Case Study Design**

A case study is an empirical investigation of a contemporary event within its real-life context, drawing on multiple data sources (Yin, 2009). This research employs a case study methodology for the following reasons: (i) each nation operates as a confined planning system, (ii) the administrative, political, and legal frameworks of planning are scrutinised, and (iii) comprehensive institutional and policy analyses are facilitated (Du Toit & Mouton, 2013). Furthermore, this research employs a multiple-case study design, with several countries serving as distinct case studies (Phelan, 2009).

The selection of developed and developing countries as case studies for this research requires each to meet the following criteria: (i) comprehensive documentation of spatial planning systems, (ii) existing scholarly literature on the country's spatial planning, (iii) similarities with the other case-study countries and with South Africa, and (iv) comparable challenges related to sustainability, spatial equity, and urban and rural development.

To gain a comprehensive understanding of global spatial planning, it was deemed appropriate to select case-study countries from each of the six continents: Oceania, Europe, North America, South America, Asia, and Africa. Due to time and resource constraints, one country was selected from each continent using simple random sampling, whereby each country within a continent had an equal probability of selection. This approach was considered appropriate as it minimises selection bias and ensures an objective representation of countries across different regions. Additionally, to ensure representation of both developed and developing countries in the case studies, three countries from each category were randomly selected (discussed in Section 3). Furthermore, South Africa will serve as the local case study, thereby increasing the total number

of case studies in this research to seven. Figure 2.2 displays the list of developed countries considered suitable for case studies in this research.

Country		Continent		Development Ranking & Status	Spatial Planning Challenges
Germany		Europe		8th, Highly developed, advanced industrial economy	Urban sprawl, housing affordability, regional disparity
✓ Canada		North America		15th, Highly developed, advanced service-based economy	Urban expansion, indigenous land rights, provincial coordination
✓ Netherlands		Europe		10th, Highly developed, innovation- and sustainability-oriented	Climate adaptation, housing shortages, high population density
✓ Australia		Oceania		6th, Highly developed, resource-rich service economy	Urbanisation, housing costs, environmental degradation
Sweden		Europe		7th, Highly developed, welfare and sustainability-focused	Urban densification, housing affordability, green transition
United Kingdom		Europe		13th, Highly developed, post-industrial economy	Regional inequality, housing crisis, limited local autonomy
Ireland		Europe		23rd, Developed, small open EU economy	Urban sprawl, rural depopulation, housing shortage

Figure 2.2: Developed Countries Suitable for Case Studies

Source: Own construction, based on World Bank (2023)

Among the seven developed countries, five are in Europe; consequently, Germany, Sweden, the United Kingdom, and Ireland were not selected. Australia, a continental country encompassing much of Oceania, was designated as the Oceania representative. Because Canada is the only North American country among the options classified as developed, it was chosen to represent the continent. Therefore, the developed countries included in this research are Australia, the Netherlands, and Canada.

Case studies from developed countries are crucial to this research. These case-study countries provide detailed information and evidence-based methods that can be adapted to address the challenges faced by South African cities. By analysing successful strategies in developed countries, planners in South Africa can develop innovative solutions and avoid common mistakes. This will result in more efficient and sustainable urban growth. Given South Africa's complex socio-economic circumstances, including poverty, inequality, and the legacy of apartheid-era spatial planning, this is especially relevant. Figure 2.3 lists the developing countries considered suitable for case studies in this research.

	Country	Continent	Development Ranking & Status	Spatial Planning Challenges
✓	Brazil 	South America 	84th, Emerging, upper-middle-income	Informal settlements, regional inequality, deforestation
✓	India 	Asia 	130th, Developing, lower-middle-income	Urban sprawl, informal settlements, regional disparities
	Mexico 	North America 	81st, Developing, upper-middle-income	Urban congestion, informal settlements, environmental degradation
	Namibia 	Africa 	137th, Developing, upper-middle-income	Rural–urban divide, land reform, limited institutional capacity
	Colombia 	South America 	91st, Developing, upper-middle-income	Urban-rural inequality, informal housing, environmental vulnerability
	Vietnam 	Asia 	93rd, Developing, lower-middle-income	Rapid urbanisation, rural-urban migration, infrastructure gaps
✓	Morocco 	Africa 	121st, Developing, lower-middle-income	Informal settlements, urban-rural imbalance, climate challenges

Figure 2.3: Developing Countries Suitable for Case Studies

Source: Own construction, based on World Bank (2023)

Since a developed country from North America had already been selected, Mexico was subsequently excluded from consideration. Among South American countries, Brazil, an emerging economy, was selected over Colombia. Given that Namibia neighbours South Africa (discussed in Chapter 7), Morocco was selected as the representative African country for this study. As a result, the developed countries included in this research are Brazil, India, and Morocco.

Case studies from developing countries are vital to this research. They offer valuable insights into context-specific challenges and innovative solutions. By exploring diverse socio-economic and cultural settings, planners can identify best practices that are adaptable to South Africa's unique urban environment. When case studies originate from socio-economic contexts like those in South Africa, where common issues such as poverty and service delivery problems are widespread, they are more effective in applying the lessons learned (Waldeck *et al.*, 2020).

• Comparative Design

In a comparative research design, two or more cases are systematically compared to identify patterns, similarities, and differences (Du Toit & Mouton, 2013). Comparisons can be made between countries, planning legislation, and policy frameworks to explain how contextual factors influence outcomes. This study compares South Africa's spatial planning system with those of both developed and developing countries to identify lessons learned, best practices, and opportunities for future reform (Creswell, 2009).

2.8 Conclusion

The research methodology represents the approach used to address a research problem. It includes the procedures and strategies for data collection and analysis. This is vital for ensuring the validity and reliability of study outcomes (Silva *et al.*, 2015). Moreover, it helps researchers select suitable techniques tailored to their specific inquiries. The research methodology of this study outlines the context in which the investigation is conducted and its objectives (Du Toit & Mouton, 2013). It also explains the philosophical principles underlying the researcher's understanding and the process through which knowledge is created. Additionally, it covers the procedures for data collection and the study's organisational structure (Creswell, 2021). Figure 2.4 illustrates the research methodology framework guiding this study.

Research Methodology Framework

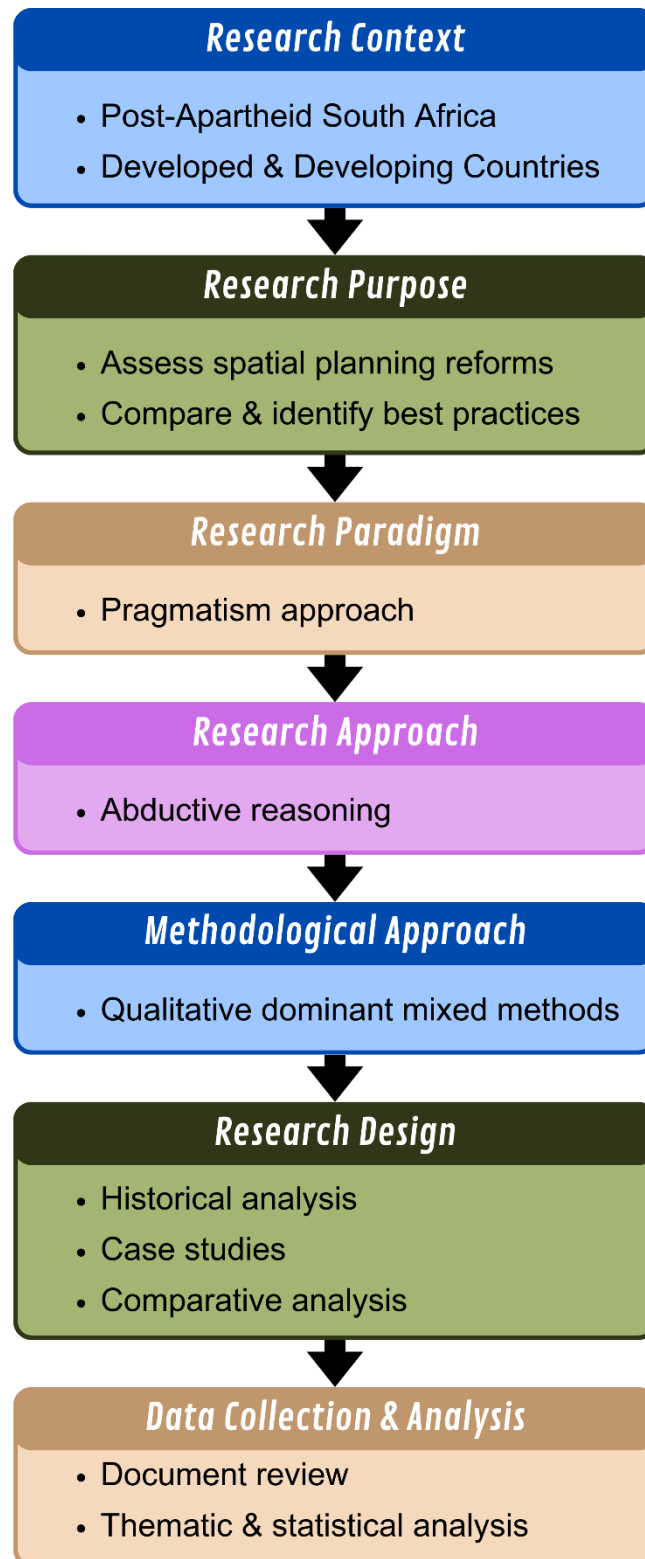


Figure 2.4: Research Methodology Framework

Source: Own construction, based on du Toit (2015)

SECTION 2 LITERATURE REVIEW

A literature review, conducted as part of a research initiative, aims to understand and integrate existing knowledge on a subject. It is crucial to identify and address current knowledge gaps, develop a theoretical framework, and support the research. In this section, planning perspectives (Chapter 3) and spatial planning (Chapter 4) will be assessed to establish a theoretical framework.

CHAPTER 3 PLANNING PERSPECTIVES

3.1 Introduction

Understanding the impact of planning theories on planning practices is essential when studying planning across diverse contexts (Olesen, 2018). According to Friedmann (2004), theoretical frameworks are crucial to the relevance and importance of planning as a professional discipline. Therefore, Friedmann (2004) distinguishes between *planning theory* and *theory in planning* to clarify the theoretical frameworks underpinning planning practices.

Planning theory is defined as normative belief systems that underpin planning methodologies. These theories provide structured frameworks and principles that guide planners in decision-making and the implementation of objectives. *Theory in planning*, whether explanatory or descriptive, explains the planning process within social, institutional, and political contexts. It examines cultural influences, institutional behaviour, and power dynamics, treating planning as a social activity shaped by economic, political, and governmental factors. Figure 3.1 offers a visual overview of the difference between planning theory and theory in planning.

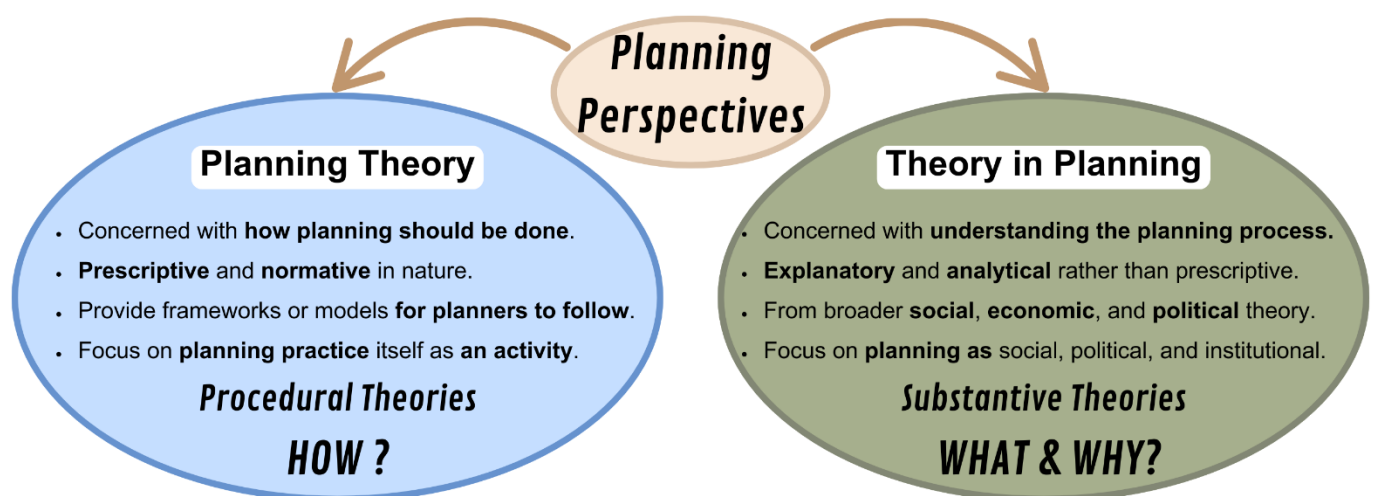


Figure 3.1: Planning Theory vs Theory in Planning

Source: Own construction, based on Friedmann (2004)

To analyse and compare context-specific planning practices, it is essential to understand how and why development occurs through the application of theories. Therefore, examining relevant theories provides a strong theoretical foundation for understanding spatial development across different contexts. This chapter aims to identify and explore key *planning theories* and *theories in planning*. In line with the study's primary objectives, this chapter will form part of the foundational framework for analysing the impact of different practices on sustainability, equity, and urban and rural development.

Specifically, this chapter focuses on: (i) identifying key theories relevant to this research, (ii) analysing and explaining each theory, (iii) understanding how these theories influence context-specific development, and (iv) how theories shape the unique development of different areas (see Section 1.3, Objective i). This understanding will form part of the theoretical foundation for evaluating planning practices in both developed and developing countries and for comparing them with those of South Africa. Additionally, *planning theories* and *theories in planning* will be covered as separate sections in this chapter. Figure 3.2 offers a visual representation of the chapter's structural framework.

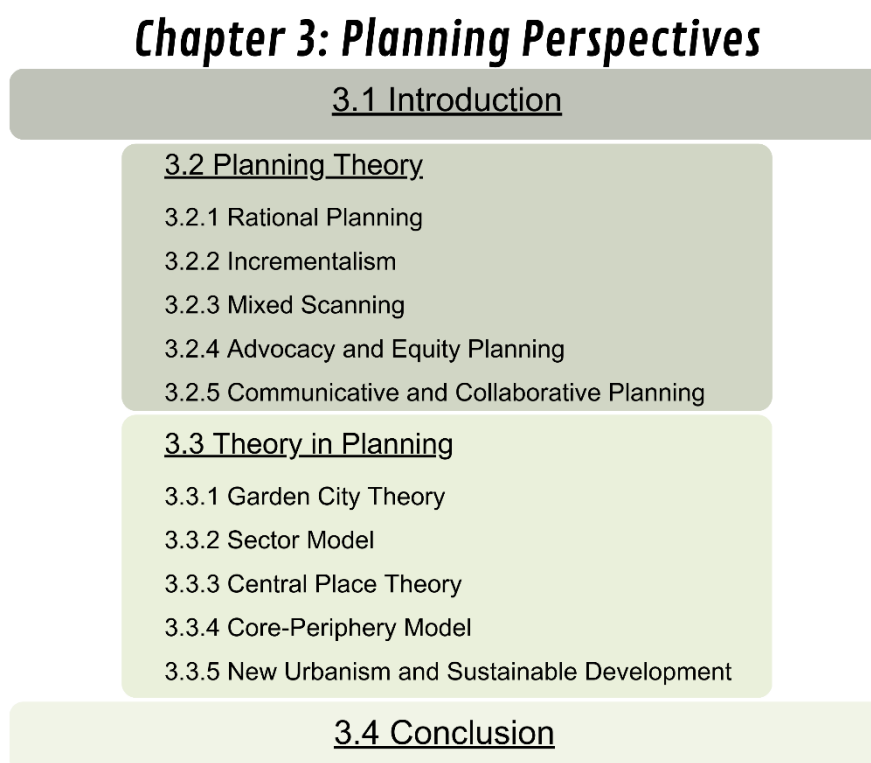


Figure 3.2: Structural Framework of Chapter 3

Source: Own construction

3.2 Planning Theory

Planning theories are systematic frameworks that outline the methodologies relevant to planning processes. These theories elaborate on planning paradigms, focusing on decision-making mechanisms, communication strategies, the distribution and influence of power, and stakeholder involvement. They address research questions such as: (i) the methodology for decision-making, (ii) the stakeholders involved in the decision-making process, (iii) the application and integration of knowledge, and (iv) the influence and function of power dynamics.

These theoretical frameworks emphasise the systematic planning processes and methodologies used by planners to fulfil their responsibilities. Additionally, there are many procedural theories, such as modernist planning (Corbusier, 1987), transactive planning (Friedmann, 1973), and radical planning (Friedmann, 1987).

However, for this research, (i) rational planning (Webber, 1963), (ii) incrementalism (Simon, 2016), (iii) mixed scanning (Etzioni, 1973), (iv) advocacy (Davidoff, 1965) and equity planning (Campbell, 2018), and (v) communicative (Healey, 1999) and collaborative planning (Healey, 2003) will be examined (in line with Research Objectives (i) and (ii)) in the following subsections. Figure 3.3 provides a visual summary of planning theory relevant to this research.

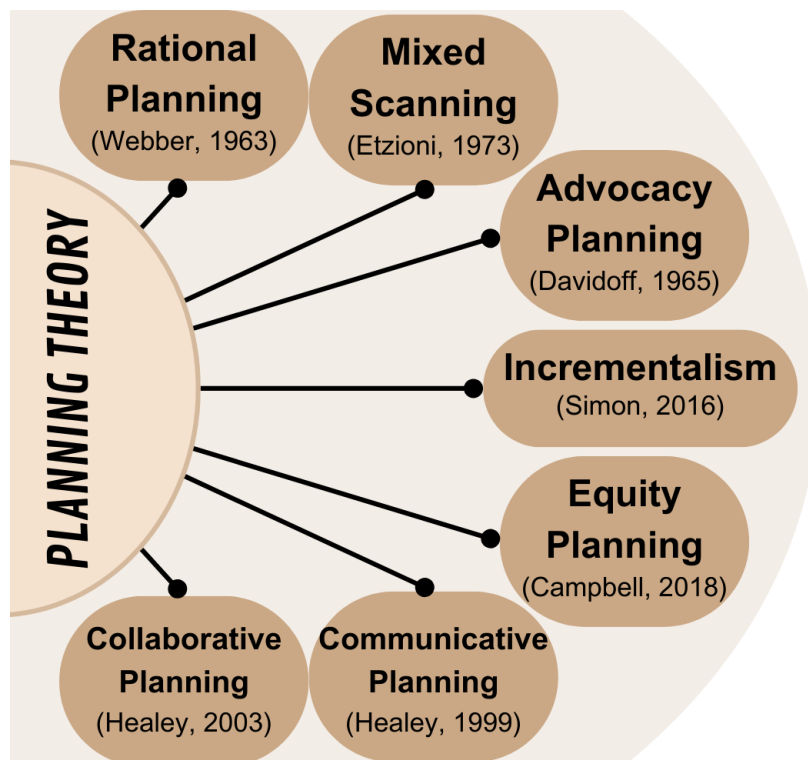


Figure 3.3: Planning Theories

Source: Own construction, based on Friedmann (2004) and Olesen (2018)

3.2.1 Rational Planning

Rational planning ensures that urban development addresses broader social issues through a systematic process that sets goals, analyses options, and evaluates outcomes. After World War II, the use of scientific methods and quantitative data in decision-making increased, leading to the development of the rational planning theory (Mäntysalo, 2005). Unlike earlier planning theories that focused on specific objectives, such as street and park layouts, rational planning emphasises procedural reasoning and decision-making processes (Faludi, 2013; Stramrud *et al.*, 2017). Consequently, planning can be regarded as a 'social agent of reason' (Hemmens & Stifftel, 1980), where rationality guides both decision-making and accountability for actions (Alexander, 2000; Brown, 1988). Essential principles of rational planning include setting clear, measurable goals, analysing qualitative and quantitative data to anticipate outcomes, and consulting diverse stakeholders throughout the process to ensure inclusive decision-making (Spiridonov *et al.*, 2023; Taylor, 2005).

Rational planning involves several forms of rationality to guide decision-making. Instrumental rationality focuses on using effective means to achieve goals, balancing creativity with practical constraints (Friedmann, 1987; Marschak, 1968). Substantive rationality considers motivations, principles, and social or ethical factors behind decisions (Alexander, 1998; Cox & Willard, 1982), while deliberative rationality involves structured stakeholder discussions to evaluate options and achieve informed consensus (Wildavsky & Caiden, 1988; Sager, 1993). Communicative rationality emphasises clear, honest communication to promote shared understanding (Habermas, 1985; Alexander & Faludi, 1996), whereas pragmatic rationality prioritises practical outcomes and flexibility by combining deliberative and interactive approaches (Blanco, 1994; Stein & Harper, 1997). Ethical rationality integrates moral considerations to ensure decisions align with societal norms and accountability (Forester, 2017). Lastly, bounded rationality recognises cognitive and resource limitations, focusing on practical choices while considering organisational and social influences (Alexander, 1998; Lindblom, 2018). Collectively, these rationalities form a comprehensive framework for understanding planning decisions.

Despite its structured approach, the rational planning model faces criticism for being overly technical, focusing on quantitative data, and being driven by procedural goals, which restricts its ability to address complex urban, social, and political issues (Alexander, 2000; Flyvbjerg, 1998; Taylor, 1998). Organisations may lack political influence, fail to set realistic objectives, or settle for the first acceptable option due to time and resource constraints (Lindblom, 2018; March & Simon, 1993; Lepawsky, 1949; Simon, 1979; Taylor, 1998). Its reliance on objective data can

neglect cultural, ethical, and social factors, while ignoring creativity, intuition, and local knowledge reduces its effectiveness in complex contexts (Alexander, 2000; Fainstein, 2005). Nonetheless, rational planning can succeed under well-defined conditions. When applied appropriately, it offers accountability, consistency, and transparency. However, its rigidity and technical focus highlight the importance of combining it with flexible, inclusive, and context-sensitive approaches in modern planning. Figure 3.4 offers a visual overview of the different types of rationality and their integration.

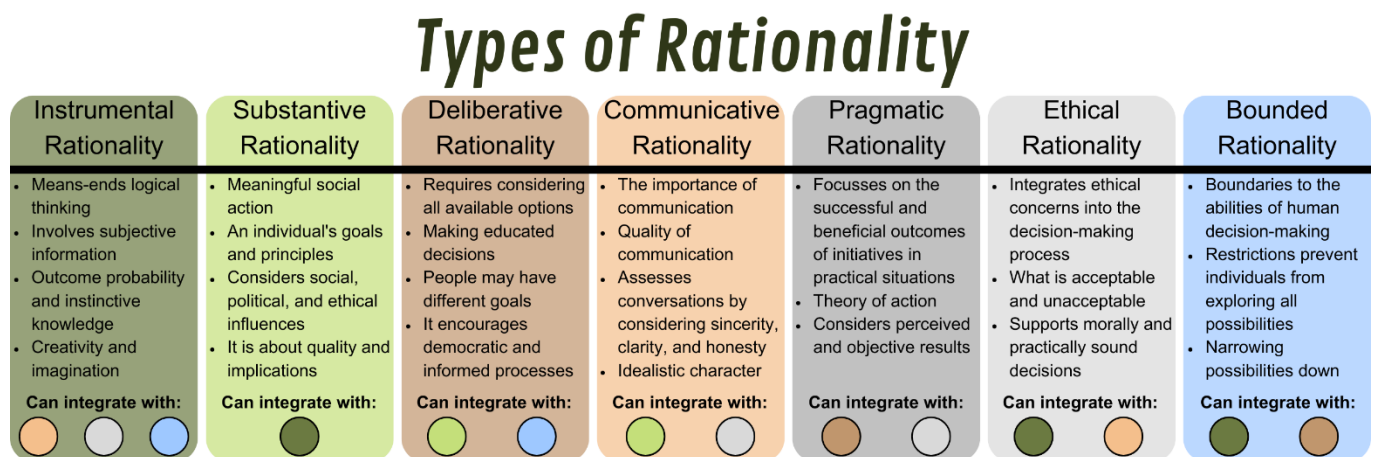


Figure 3.4: Types of Rationality

Source: Own construction, based on Weber (2008)

3.2.2 Incrementalism

Incrementalism facilitates the gradual implementation of significant changes through practical steps, making it a flexible and adaptable planning theory. Rather than treating master plans as fixed long-term blueprints, incrementalism advocates continual refinement, as exemplified by the city of Lahti, Finland, which revises its master plans every four years (Mahoney & Thelen, 2009). The flaws of modernist planning, which often neglected community needs and local dynamics, led to the development of incrementalism (Dovey, 2016). This theory aligns with the principles of new urbanism, favouring development that respects existing urban fabrics and promotes local participation (Talen, 2006). According to Simon (2016), small, cumulative actions can produce significant effects, enabling planners to modify strategies as conditions change.

Incrementalism is particularly beneficial where formal planning resources and organisational capacities are limited, enabling communities to grow gradually while addressing housing, infrastructure, and social needs (Alam, 2023; Baitsch, 2016). The theory emphasises flexibility, local autonomy, and stakeholder coordination, fostering cultural heritage and identity while establishing short-term rules within a strategic long-term perspective (Dovey, 2016; Mäntysalo et

al., 2019). For example, the ALARIC project in Lyon and Saint-Étienne, France, used historical data to guide incremental urban transformation, contributing to Saint-Étienne's recognition as a UNESCO Creative City of Design (Périnaud & Gesquière, 2015). By addressing immediate local needs while gradually building capacity, incrementalism ensures that small-scale interventions collectively produce substantial long-term impacts (Simon, 2016; Colnett, 1991; Pelling, 2010). Incrementalism also prioritises problem-specific projects that offer additional benefits, such as environmental sustainability and improved quality of life (Arias *et al.*, 2020; Bulkeley & Tuts, 2013).

Urban morphology and life-quality indicators assist planners in targeting interventions suitable for specific neighbourhoods, allowing adjustments as new information becomes available (Hall, 1997; Bulkeley & Tuts, 2013). Coastal adaptation strategies in Florida, United States, demonstrate how incremental planning balances immediate needs with long-term consequences (Butler *et al.*, 2016). However, incrementalism has limitations: it may conflict with official planning laws, depend on limited resources or political will, and risk perpetuating informalities that could undermine long-term urban sustainability (Baitsch, 2016; Alam, 2023; Bulkeley & Tuts, 2013). An overreliance on it may also result in fragmented growth and hinder the achievement of broader urban development goals (Wensing, 1994; Hartgen *et al.*, 1996). Therefore, incrementalism is most effective when combined with strategic spatial planning, balancing short-term flexibility with long-term vision to promote coherent and sustainable urban development.

3.2.3 Mixed Scanning

Mixed scanning is a hierarchical decision-making theory that combines elements of rationalism and incrementalism, enabling planners to align lower-level incremental decisions with higher-level fundamental choices (Goldberg, 1975; Etzioni, 1986). The theory involves scanning, collecting, processing, assessing, and drawing conclusions, while permitting adjustments between higher and lower decision levels in response to situational changes (Zhang, 2024). Etzioni (1986) developed mixed scanning to address the limitations of purely incremental or rationalist theories, offering a more strategic and flexible alternative that balances thorough evaluation with practical constraints. Faludi (1973) considers mixed scanning the most sophisticated planning theory, as it requires decision-makers to synthesise broad observations with detailed analyses, thereby integrating rationalist and incrementalist methodologies as appropriate. Etzioni (1973) describes it as a 'third approach', recognising that rational planning can be too idealistic, while incrementalism may be too limiting.

Mixed scanning combines the strengths of both theories: rationalism counteracts incrementalism's conservatism by exploring long-term options, while incrementalism simplifies rationalism's complexity by restricting the scope of fundamental decisions (Drewe, 2011).

Planners are encouraged to organise information, formulate strategies, and adapt to emerging challenges, ensuring policies remain relevant over time (Faludi, 1973; Etzioni, 2016). Key principles of mixed scanning include resource allocation, distinguishing between fundamental and incremental decisions, combining approaches, and supporting policy formulation and decision-making. Resources are allocated across phases: broad scanning identifies areas of interest, and in-depth scanning focuses on critical issues (Etzioni, 2016; Ntiwane & Coetzee, 2018). Time management, phased investment, and adaptable resource distribution ensure that goals remain achievable (Ghallab *et al.*, 2004; Kosenko *et al.*, 2020). Rational decisions set the framework and long-term priorities, while incremental decisions address specific, short-term objectives, ensuring that each component compensates for the other's weaknesses (Drewe, 2011).

Mixed scanning's adaptability allows planners and stakeholders to retain control over projects by providing information for strategic assessments and informed decision-making (Abdulkadir-imam, 2019). The theory supports ongoing evaluation, enabling policy adjustments and continuous innovation. Rationalist elements ensure that decisions enhance residents' well-being, while incrementalist features maintain flexibility and responsiveness to changing circumstances (Ntiwane & Coetzee, 2018). Despite its benefits, mixed scanning faces limitations. Critics argue that it may struggle in complex urban environments, oversimplify institutional dynamics, and hinder effective stakeholder collaboration (Granqvist *et al.*, 2021; Hersperger *et al.*, 2024). Its practical success is also influenced by political contexts, which can shift priorities and threaten long-term planning efforts (Arthurson, 2012). Furthermore, limited empirical evidence exists to confirm the model's effectiveness, partly because isolating its impact from the combined use of rationalist and incrementalist approaches is difficult (Etzioni, 1986; Zhang, 2024). Figure 3.5 provides a visual overview of how combining rational planning and incrementalism created mixed scanning.

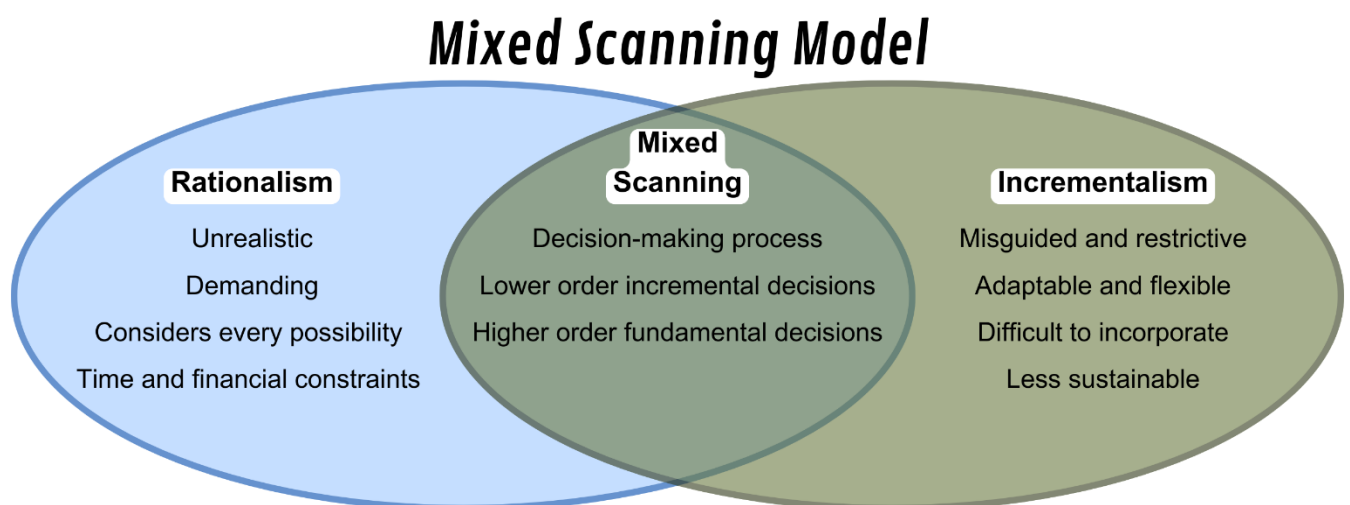


Figure 3.5: Mixed Scanning Model

Source: Own construction, based on Etzioni (1986)

3.2.4 Advocacy and Equity Planning

- **Advocacy Planning**

The mid-1960s marked the start of advocacy planning in response to the socio-economic challenges facing American cities. Urban areas experienced economic decline in the years after World War II, driven by suburbanisation and deindustrialisation. Civil rights movements inspired advocacy planning, highlighting the need for participatory decision-making and fair urban policies (Kenneth & Raciti, 2024). As inequalities grew, advocacy planning became especially crucial, particularly at the onset of Reagan-style neoliberalism, when planning for change was vital (Angotti, 2007). Advocacy planning has evolved into a key tool for promoting justice-related issues, such as equal access to cities and environmental justice, because this approach emphasises reducing economic and social disparities (Angotti, 2007). Davidoff's 1965 paper, 'Advocacy and Pluralism in Planning', profoundly influenced the field of advocacy planning. The paper criticised traditional planning theories for excluding marginalised communities and called for a more diverse and equitable approach to planning (Davidoff, 2015). To ensure that marginalised communities' concerns were integrated into the planning process, Davidoff proposed that planners should function as their representatives (Davidoff, 2015).

With several student-led projects promoting inclusive design and planning methods, advocacy planning ideas began to influence urban planning education (Charitonidou, 2022). Advocacy planning emphasises the need for planning to incorporate diverse interests, values, and goals, rather than being value-neutral (Sager, 2022). Davidoff believed that, in advocacy planning, stakeholders should develop individual solutions to problems, and democratic decision-making institutions should select the best solution or a combination of solutions (Sager, 2022). Overall, this theory highlights the crucial role of planners in ensuring equality and justice throughout the decision-making process, especially when marginalised communities are involved (Checkoway, 1994). It focuses on generating achievable goals, addressing fundamental concerns, and making reasonable assumptions (Checkoway, 1994). Advocacy planning in cities such as San Francisco and Oakland, United States, prioritised the needs of the urban poor, employing both nondirected and directed strategies to influence resource allocation and local government decisions (Kaplan, 1969). Although advocacy planning has made considerable progress in promoting inclusivity, some critics argue that it may not adequately address the complexity of power dynamics in urban planning, underscoring the need for continued development in this area (Marris, 1994).

- **Equity planning**

Masser *et al.* (1993) define equity planning as planning grounded in economic, political, social, and spatial justice. According to Alterman (2014), it involves distributing public resources fairly among all socio-economic groups, while Fainstein (2014) sees it as prioritising the less fortunate. Equity planning focuses on marginalised communities and their access to opportunities and resources (Talen, 1998). These include the elderly, children, women, low-income groups, people with disabilities, and people of colour, who often lack political and financial influence (Fainstein, 2014). However, the meaning of equity can vary among communities (Israel & Frenkel, 2018). Effective equity planning can enhance access to public resources, increase affordable housing, and foster social integration (Alterman, 2014). Historically, planning overlooked inequality, although since the 1960s planners have argued for integrating equality into planning practice (Talen, 1998). Loh and Kim (2021) found that although different planning practices place varying emphasis on equality, equity-related issues remain central in planning discussions. Campbell (2018) identifies equity as one of three planning goals, alongside economic development and environmental protection, although it is often overlooked. This theory aims to balance growth, innovation, social justice, and environmental sustainability (Masser *et al.*, 1993).

Loh and Kim (2021) emphasise a direct link between public participation, planning capacity, and equity planning, suggesting that cities with greater participation are more focused on equity. Equity planning involves understanding the historical context and diversity of communities, ensuring fair access to resources, and engaging the public in decision-making. For communities that have faced injustices, recognising their historical background is essential to prevent the recurrence of inequalities (Anguelovski *et al.*, 2016). Each community's identity and challenges should be considered (Meerow *et al.*, 2019). This approach promotes equitable access to opportunities, especially for disadvantaged groups (Fainstein, 2014). Equity planning encourages involving community input through participation and ongoing engagement (Loh & Kim, 2021; Anguelovski *et al.*, 2016). It demands fairness in both processes and outcomes (Alterman, 2014) and should be integrated into all planning stages, including housing, environmental, and transport planning (Loh & Kim, 2021). However, limited funding, weak political support, and unequal planning capacity hinder its realisation (Aparicio, 2018). Balancing equity with economic development complicates implementation (Masser *et al.*, 1993). Despite being a conceptual priority, equity is often poorly applied, revealing a gap between theory and practice (Loh & Kim, 2021). Figure 3.6 provides a visual overview of the relationship between advocacy and equity planning.

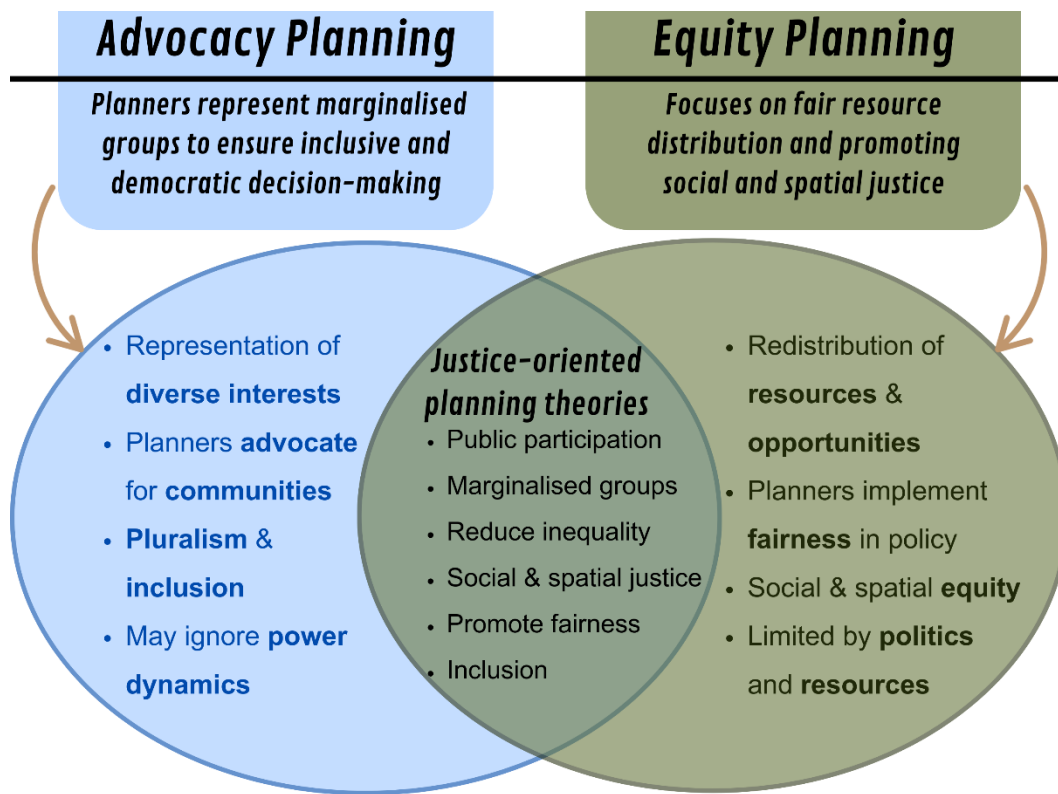


Figure 3.6: Advocacy and Equity Planning

Source: Own construction, based on Davidoff (1965) and Campbell (2018)

3.2.5 Communicative and Collaborative Planning

- **Communicative planning**

The intellectual basis of communicative planning stems from Habermas's concept of communicative action, which emphasises communication and understanding among stakeholders as fundamental to planning (Healey, 1999). This theory emerged in the 1970s, a period when empowering and involving marginalised communities became increasingly crucial in spatial planning. Building on ideas from critical and social theories, scholars began to define the core principles of communicative planning by the early 1980s (Allmendinger & Tewdwr-Jones, 2002). This theory differs from traditional, top-down approaches by prioritising stakeholder cooperation and dialogue. It emphasises the importance of interaction and communication throughout the planning process (Innes, 1998). This perspective suggests that the planner's role shifted from merely providing information to active participation and dialogue (Healey, 1999). Consequently, planners now actively engage with the public to keep them informed, rather than simply offering neutral advice (Healey, 1999). Information is more than a decision-making tool; it influences the community's ideas and actions (Innes, 1998). This indicates that information indirectly influences participants' behaviour by shaping shared meanings (Innes, 1998).

Therefore, planners must adopt a new code of ethics aligned with communication methods to ensure that discussions lead to beneficial outcomes for society (Healey, 1999). Communicative planning promotes a more collaborative and participatory approach, emphasising stakeholder involvement, communication, teamwork, and consensus-building (Innes, 1998). Despite criticism and challenges in governance and stakeholder engagement, the shift towards communicative planning continues (Healey, 1999). The theory is applicable worldwide, as shown by its implementation in cities such as Beijing, China, and Uppsala, Sweden (Zhang *et al.*, 2024). Recent examples highlight ongoing difficulties in applying communicative planning in practice, particularly participatory planning in Florianopolis, Brazil. Although Amsterdam, the Netherlands, is regarded as a pioneer in communicative planning, it is essential to recognise that the theory has been adapted and interpreted differently across various international contexts, reflecting local demands and challenges. While communicative planning has become more popular, some argue that traditional planning approaches still retain value, especially in situations that require rapid decision-making. This ongoing debate reflects the changing nature of planning theories and the need for adaptable methods (Healey, 1999).

- **Collaborative Planning**

Collaborative planning aims to promote fair and sustainable development. This approach emerged from late 20th-century discussions about the timeliness, effectiveness, and desirability of planning methods. As it developed through the collective efforts of various scholars, no single author can claim its origin (Tewdwr-Jones & Allmendinger, 2002). Collaborative planning is a bottom-up approach in which all stakeholders are equally informed and involved in decision-making (Innes & Booher, 1999). It encourages inclusive planning and moves away from traditional rational methods, focusing on participatory processes that rely on face-to-face dialogue (Friedmann, 1993). Brand (2010) states that when citizens participate in policymaking, policies are more likely to reflect community needs, thereby fostering a coevolutionary relationship between planning and society. This theory emphasises inclusivity and consensus-building over competition, promoting shared strategic decisions and non-adversarial communication (Innes & Booher, 1999). It recognises that both societal and governmental actors contribute meaningfully to planning, challenging the view of government as the sole authority (Westerink *et al.*, 2017). Two main ideologies exist: one led by the government with community input, and one led by the community with government participation (Westerink *et al.*, 2017).

This shifting balance illustrates the dynamic relationship between public and governmental roles (Emerson *et al.*, 2012). Collaborative planning, therefore, offers diverse options for cooperation among actors across governance levels. It promotes equitable and sustainable development by

meeting diverse social needs and enhancing public participation (Brand & Gaffikin, 2007). The theory fosters inclusive governance by incorporating various perspectives (Rowley, 2006). Traditional top-down planning approaches have proven inadequate for managing complex challenges, underscoring the importance of public participation (Innes & Booher, 1999). Collaborative planning also considers global influences while emphasising local priorities and place-specific initiatives (Rowley, 2006). Although it facilitates open dialogue among stakeholders, the diversity of opinions can hinder consensus-building (Westerink *et al.*, 2017). Because the roles of government and society are fluid, collaboration must remain adaptable and responsive to political and economic shifts (Healey, 2020; Flyvbjerg, 1998).

However, collaborative planning does not always ensure inclusivity (Healey, 2006). Limited resources, particularly in smaller municipalities, can restrict participation and representation (Healey, 2017). In divided or politically complex communities, collaboration may create communication barriers and uneven outcomes (Brand & Gaffikin, 2007). Research also indicates a lack of regional-level focus, despite growing interest in strategic regional planning (Westerink *et al.*, 2017). Sager (2008) points out that this theory assumes the government is willing to cooperate, which is not always the case. Lack of participation can result in fragmented leadership and inconsistent policies (Brand & Gaffikin, 2007). Power imbalances and unequal stakeholder representation can lead to conflicts and threaten democratic integrity (Innes & Booher, 2015; Healey, 2006). Therefore, although collaborative planning encourages inclusivity and shared governance, it remains a complex theory that depends on trust, resources, and genuine cooperation to succeed. Figure 3.7 provides a visual overview of the relationship between communicative and collaborative planning.

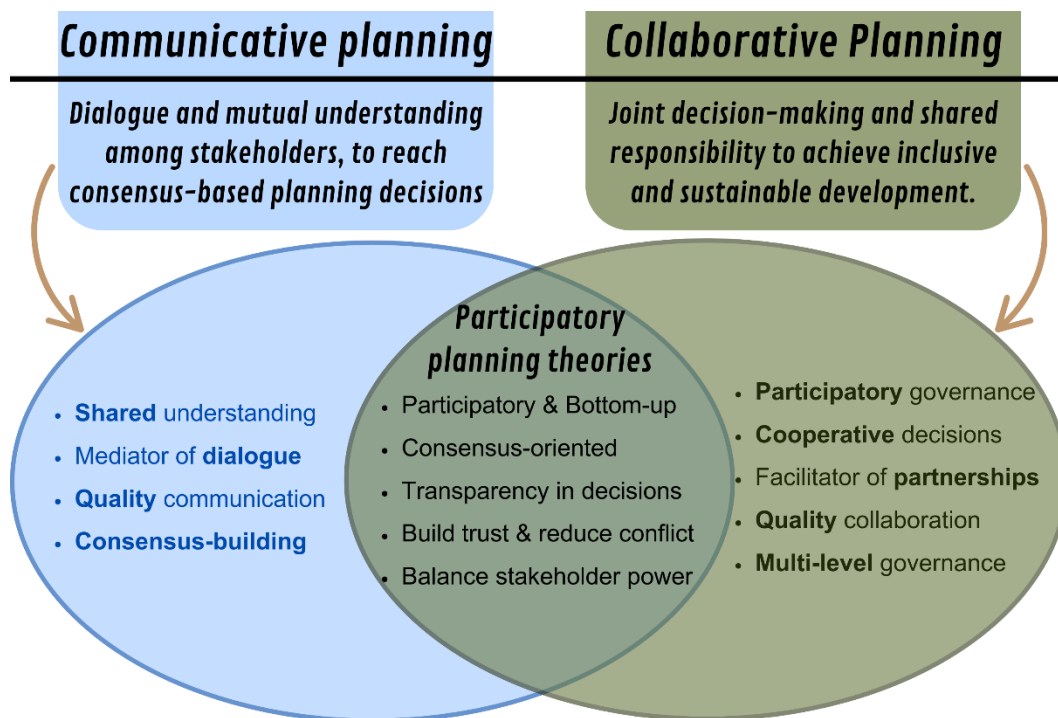


Figure 3.7: Communicative and Collaborative Planning

Source: Own construction, based on Healey (1999) and Healey (2003)

3.3 Theory in Planning

Theories in planning provide essential frameworks for understanding how cities and regions function. These theories offer prescriptive insights into the planning process and clarify the mechanisms driving urban development. They address research questions such as: (i) the processes behind urban growth, (ii) the identification of optimal land-use patterns, and (iii) the impact of transport systems on development trajectories.

These theoretical frameworks focus on the objectives of planning, as well as the processes and structures of urban development. Additionally, there are many substantive theories, such as the concentric zone model (Burgess, 1925), the multiple nuclei model (Harris & Ullman, 1945), the growth pole theory (Perroux, 1950), and the compact city theory (Dantzig, 1973), among others.

However, for this research, (i) the garden city theory (Howard, 1898), (ii) the sector model (Hoyt, 1939), (iii) the central place theory (Christaller, 1933), (iv) the core-periphery model (Friedmann, 1966), and (v) new urbanism (Day, 2003) and sustainable development (Brundtland, 1987) will be examined (in line with Research Objectives (i) and (ii)) in the following subsections. Figure 3.8 provides a visual summary of planning theories relevant to this research.

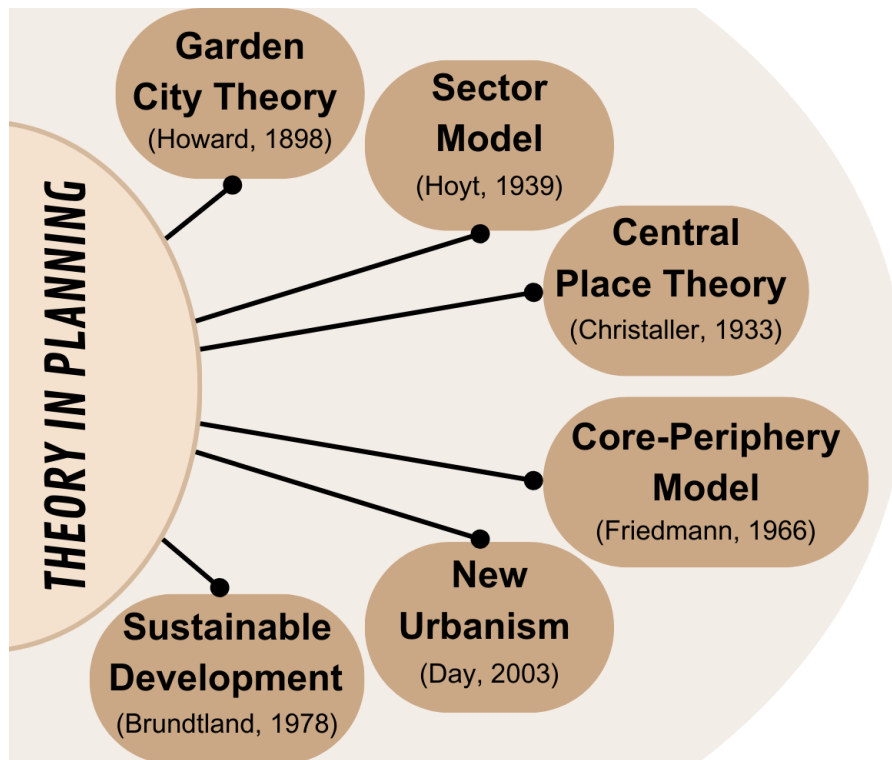


Figure 3.8: Theories in Planning

Source: Own construction, based on Friedmann (2004) and Olesen (2018)

3.3.1 Garden City Movement

In response to unplanned urban growth, Howard developed the garden city model in 1898, drawing on the ideas of economist Marshall and geographer Kropotkin (Gatarić *et al.*, 2019). Their views prioritised decentralisation in metropolitan areas and planned city development to mitigate the social consequences of industrial concentration (Gatarić *et al.*, 2019). To bridge the gap between urban and rural communities, Howard proposed establishing a new type of city, the garden city, that would incorporate the advantages of both to create an ideal living environment (Howard *et al.*, 2013). The garden city model applied planning principles to create an area with environmental, cultural, and economic benefits (Clark, 2003). Howard envisioned a city with radially concentric spatial arrangements, divided into six equal living units, each with its own infrastructure and utilities, surrounded by a green belt for recreation and cultivation (Howard *et al.*, 2013). Furthermore, in the garden city, distinct zones would be separated by space, also known as zoning, and when the primary garden city reached capacity, new garden cities would be constructed (Clark, 2003). The goal was to decentralise urban expansion and connect cities through direct transport routes to facilitate efficient movement (Gatarić *et al.*, 2019).

This theory inspired planning for balanced urban growth by proposing self-contained, sustainable cities surrounded by green belts. Letchworth, England, the first garden city, was established in 1903 and set an example for future development (Knight, 2023). Early in the 20th century, Howard's ideas gained popularity and influenced urban planning in several countries, most notably Poland, where towns were designed using somewhat different but related concepts (Tomczak & Szoszkiewicz, 2023). Terms such as 'Garten-stadts' and 'cit -jardins' were used to describe variations of the garden city model across Europe, particularly in Germany and France (Coskun, 2024). Recently, the COVID-19 pandemic has sparked renewed interest in garden cities, leading to a return to Howard's ideas of open, green spaces and a re-evaluation of urban living conditions (Coskun, 2024). Although it is difficult to determine the exact number of garden cities, many modern projects, especially those in urban areas seeking sustainable solutions, embody Howard's principles. However, critics argue that the original garden city principles may not fully address contemporary urban challenges, emphasising the need for more comprehensive initiatives that consider a range of socio-economic factors (Talen, 2023). Figure 3.9 provides a visual overview of the garden city model.

Garden City Model

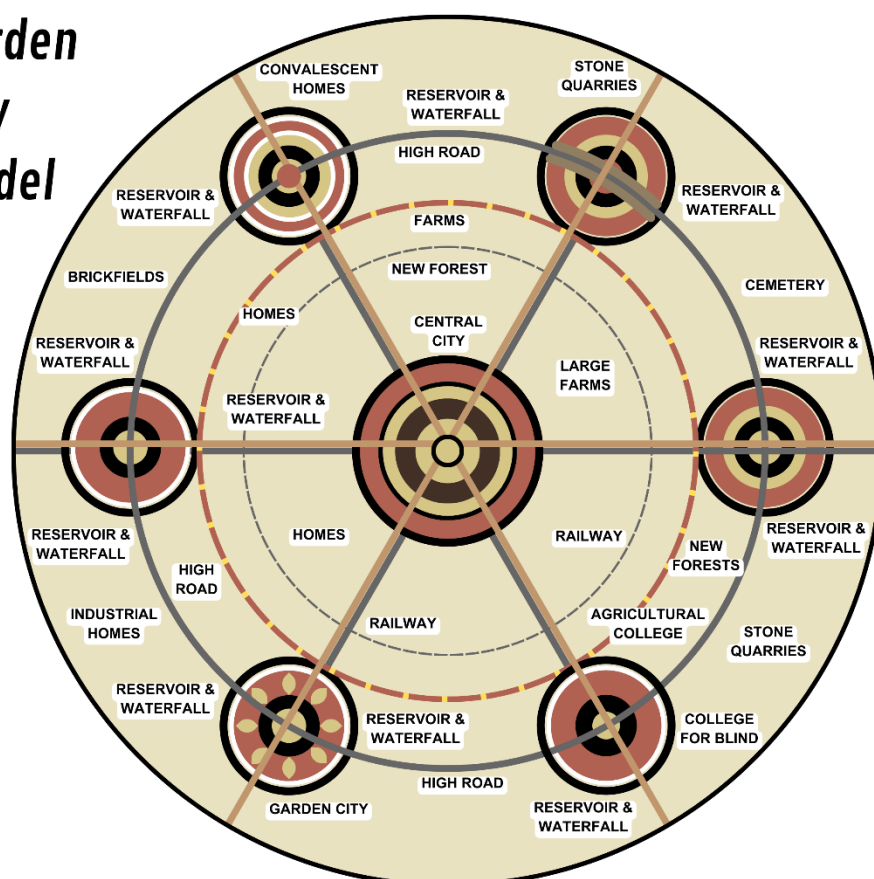


Figure 3.9: Garden City Model

Source: Own construction, based on Howard (1898)

3.3.2 Sector Model

The sector model emphasises the city centre and its outward expansion. In 1939, Homer Hoyt developed an urban planning model known as the sector theory or wedge theory. This model builds on Burgess's concentric zone model of 1925. The fundamental principle was to divide land use into separate sectors, with development extending beyond the central business district (Cilliers, 2010). The model was applied in nearly 70 urban areas across the United States, delineating more than 200,000 neighbourhood blocks, demonstrating its effectiveness. The sectors can be viewed as separate 'slices', each extending from the city centre to its outskirts. The sector model's shape was likened to slicing a pie, reflecting the absence of restrictions within the city (Meyer & Esposito, 2015). The arrangement and growth of transportation networks heavily influenced the sectors. These networks were strategically aligned along the boundary lines that divided each sector. Such corridors and geopolitical boundaries were identified as the least resistance routes. Furthermore, the model's design facilitated the development of ribbon-style street frontages, leading to the emergence of the radial corridor hypothesis (Adams, 2005).

The sector model indicates that proximity within sectors fosters beneficial synergistic interactions among land uses within an urban structure. Hoyt (1939) established an early conceptual framework for the city's potential for growth and prosperity. This allowed residential neighbourhoods for high- and middle-income residents to develop in rural areas on the city's outskirts without disrupting other industrial sectors. According to Adams (2005), high-income individuals could acquire and develop land assets. In contrast, middle-income residents often rented properties, such as apartments or flats, and were responsible for paying rent (Cilliers, 2010). The primary deficiency of the sector model is the increase in property values following the development of residential properties aimed at high- and middle-income groups, which subsequently renders these properties financially inaccessible for individuals from low-income backgrounds (Adams, 2005). Consequently, the development of residential properties for middle- and lower-income households has become economically unviable due to rising land prices and market conditions. Hoyt's model asserts that topographical features can be strategically exploited to enhance the value of residential properties. Specifically, waterfronts, plots with panoramic views, natural aesthetic areas, and elevated terrain are identified as factors that improve the rentability of housing (Cilliers, 2010).

To preserve property values, transportation corridors were intentionally placed away from these high-value areas. In contrast, residential developments for lower-income groups were located near industrial complexes (Adams, 2005). According to Hoyt (1939), individuals from higher socio-economic backgrounds have the financial means to live further from industrial areas and to afford

more expensive transport options, such as automobiles. Since financial constraints were not a limiting factor, it was decided that those with higher socio-economic status should be located near main transportation routes (Meyer & Esposito, 2015). The concept of the ability to pay was influenced by competitive dynamics, based on the assumption that individuals or entities with greater financial resources were better equipped to select the most suitable sites for development. Furthermore, land use patterns generally attract similar land uses, thereby promoting sectoral development by concentrating specific land use types and simultaneously preventing the spread of alternative land use categories. Figure 3.10 provides a visual overview of the sector model.

Sector Model

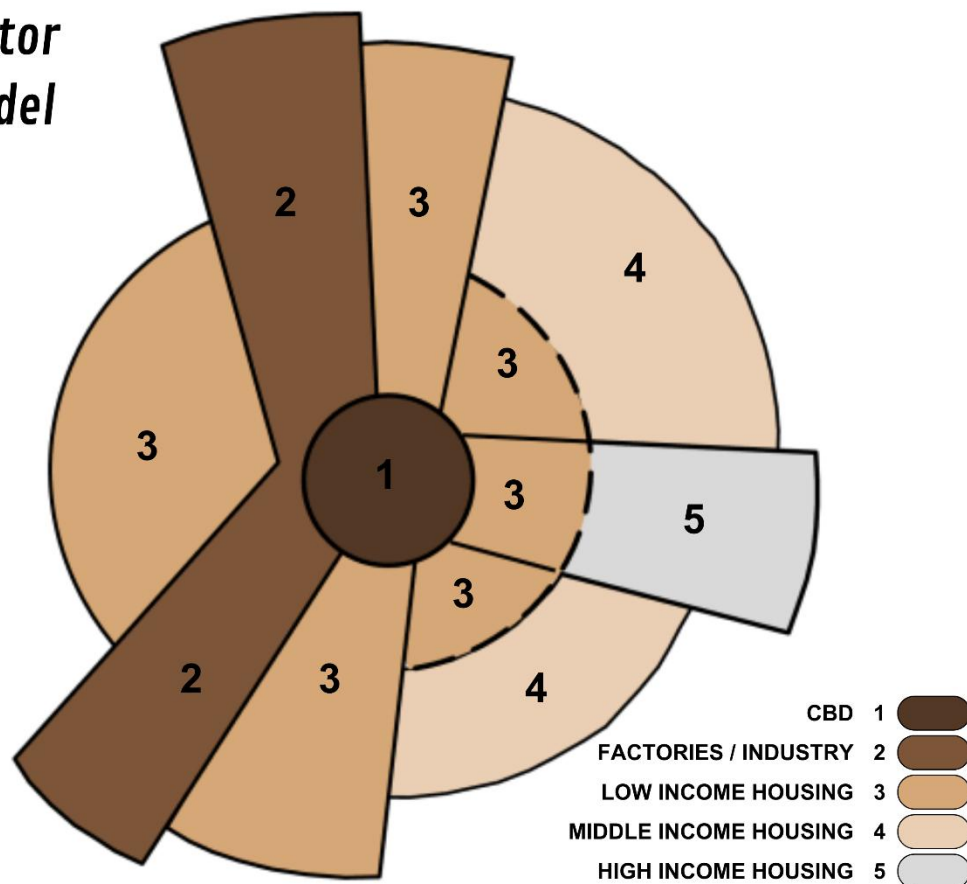


Figure 3.10: Sector Model

Source: Own construction, based on Hoyt (1939)

3.3.3 Central Place Theory

In 1933, Walter Christaller developed the central place theory to explain the hierarchy and spatial distribution of settlements within a specific geographic area, assuming geographically uniform spaces. Central place theory is a key economic model, grounded in spatial competition, that describes and predicts the optimal spatial arrangement of settlements (Christaller, 1966). It has laid the essential groundwork for understanding the development, expansion, and interaction of

settlements within designated service regions. It has become one of the most crucial models in spatial economics (Sonis, 2005). Because of its ability to explain the functional connections between urban centres and their surrounding hinterlands, geographers, economists, and sociologists have used it to analyse urban hierarchies, trade zones, and settlement patterns (Sonis, 2005). The theory describes the extent of economic influence a central place has within the hierarchical structure. According to Christaller's theory, a central place is part of a settlement hierarchy that guides the development of surrounding settlements.

The classification of a place as a city, town, village, or hamlet depends on factors outlined in the central place theory. Christaller (1966) argues that the optimal location for a city is at the centre of a region, a concept he calls the 'centrality of a central place'. Centralising activities in one location enhances service area development, leading to positive outcomes for residents and neighbouring regions. People within the designated service zone are expected to travel to the central hub for services. Christaller (1966) explained this by stating: "An economic distance is determined by the expenses related to freight, insurance, and storage; time factors and the reduction of weight and spatial capacity during transit; and regarding passenger travel, the monetary implications of transportation, the time involved, and the physical discomfort of movement". The spatial location and size of a central place, along with its functions, depend on the number of services available within a specified area (Christaller, 1966).

The economic impact of a central place depends on how far people are willing to travel for a service and on the population size needed to sustain it. Christaller (1966) identifies two main factors that determine a central location's service range: the threshold population and the variety of goods and services available. The service range is the maximum distance consumers are willing to travel to access a service. The threshold is the minimum population size required to support a specific service or business (Mulligan *et al.*, 2012). Higher-order goods and services, such as furniture or specialised medical care, require larger populations and longer travel distances than lower-order items like groceries, which have lower threshold populations and shorter service ranges. Together, these concepts define the economic limits within which any service area operates (Pacione, 2009). In a hierarchical structure, settlements are systematically organised based on the economies of scale of their services (Mulligan, 1984). According to Knitter (2013), higher-order locations perform all the functions of lower-order sites and offer additional features not found in lower-order locations. Although all regions have local centres, higher-order centres are predominantly found in larger cities, effectively serving the population's needs (Mulligan, 1984). In contrast, smaller towns often struggle to meet similar demands.

Christaller (1966) employed geometric reasoning to explain the distribution of settlements across space. He proposed that a circular arrangement of market areas would optimally serve each central location. However, stacking circular zones led to spatial inefficiencies. To overcome this, Christaller (1966) suggested using hexagonal market areas, which enable connections between towns without overlaps or gaps. This system features six smaller towns surrounding each primary centre, creating a hierarchical and layered system of service provision. The concept of the K-value, representing the constant ratio between larger and smaller centres, was later introduced to measure this hierarchy (Mulligan *et al.*, 2012). Each region plays a crucial role in distributing goods and services; however, central places often dominate the market by supplying essential resources to nearby settlements.

Christaller (1966) argues that the spatial distribution of the service sector, together with the residential locations of consumers and regions dedicated to agriculture and industry, collectively shape the geographical arrangement. Settlement development is vital because it enhances operational efficiency by enabling activities to be conducted in centralised locations rather than in decentralised or scattered areas (King, 1985). Centralised locations create specific service zones within town centres. Despite offering valuable insights into spatial organisation, central place theory has been criticised for oversimplifying real-world complexities. Its empirical validity is limited by assumptions of homogeneous consumer behaviour and isotropic, uniform space, which necessitated subsequent refinements (Sonis, 2005). Nonetheless, the theory remains a valuable tool for explaining settlement hierarchies and informing spatial planning decisions. Factors such as demographic changes, social hierarchy, economic conditions, and demand for goods and services influence central place theory.

This framework links urban hierarchies, functional roles, and quantitative measures, and has been widely used to model and understand urban systems across regions since the 1950s. Many researchers have sought to refine and extend Christaller's central place theory through empirical testing and theoretical analysis. The most advanced revision was proposed by Lösch (1954), who improved the central place theory by reconstructing it based on core economic principles. Lösch (1954) introduced a more complex bottom-up model that incorporates geographical elements within economic zones, arguing that the strict hierarchy in central place theory imposed too many restrictions. By considering variations in regional economic heterogeneity, transportation infrastructure, and demographic distribution, Lösch's model offers a more accurate depiction of metropolitan systems. According to Meijers (2007), network theory provides a more precise depiction of the functional mechanisms defining a central location within a region. Therefore, Meijers (2007) recommends replacing central place theory with network theory in this context. Figure 3.11 offers a visual overview of the central place theory.

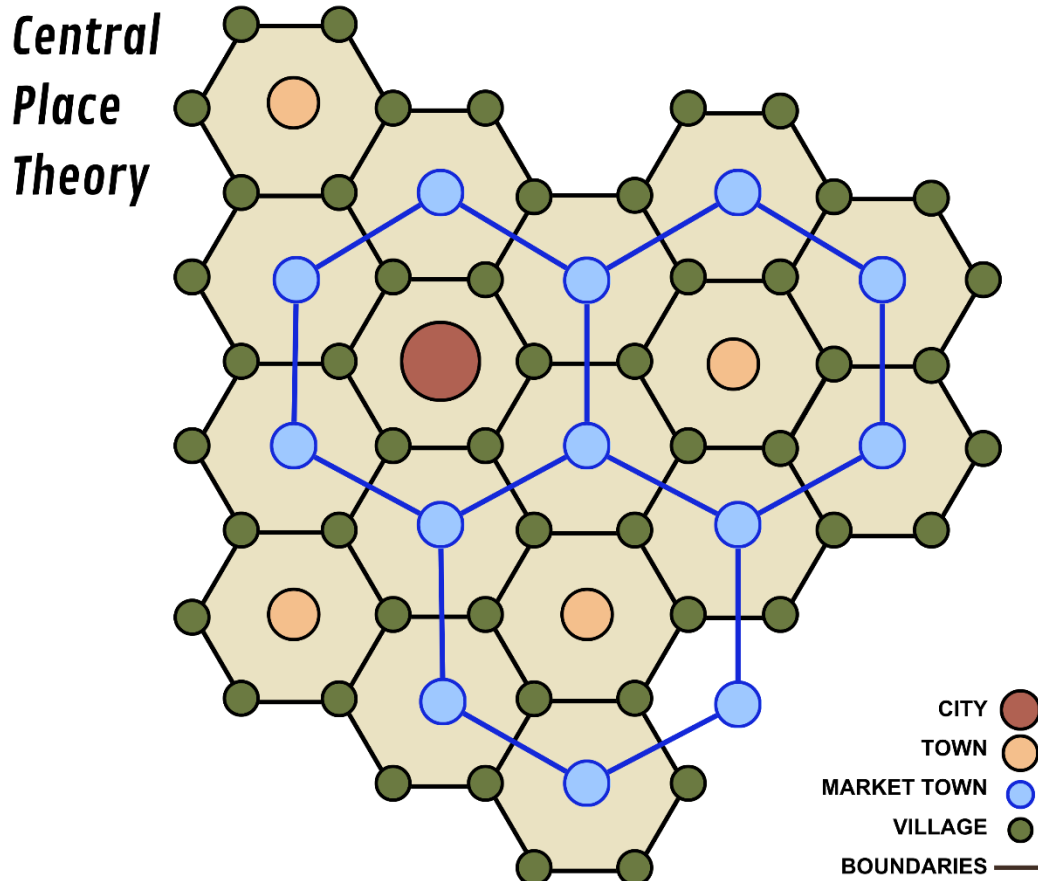


Figure 3.11: Central Place Theory

Source: Own construction, based on Christaller (1966)

3.3.4 Core-Periphery Model

The sector model (Hoyt, 1939) explains how a city centre expands into different zones and interacts with its surrounding areas. The central place theory (Christaller, 1966) describes the spatial distribution of central places and their surrounding areas, and how they interact within a hierarchy of settlements. To clarify the relationship between economic growth and spatial dispersion, Friedmann developed the core-periphery model in 1966, thereby linking the sector model (Hoyt, 1939) and central place theory (Christaller, 1966).

This model was widely used to explain the spatial dynamics of economic development in less economically developed countries (Friedmann, 1966). The initial conceptual framework was based on Venezuela's regional development policy of 1966 (Jeffrey, 1989). In this model, Friedmann identified four distinct phases of development: pre-industrial, transitional, industrial, and post-industrial. These stages of development are also closely connected to the phases of economic growth. During the early stages of societal development, known as the pre-industrial or agricultural phase, the region is mainly characterised by sparsely populated rural settlements, as

Friedmann (1966) notes. These communities exhibit a localised economic structure, marked by limited mobility and heavy involvement in farming. The geographical layout consists of small, somewhat isolated settlements, where primary-sector industries such as mining and agriculture predominate. Near these activity hubs, smaller urban centres develop to perform administrative and service roles.

The onset of industrialisation is observed during the second phase, often referred to as the transitional stage, during which development emerges from the core. During this period, economic activities within the region become concentrated around one or two central areas (Jeffrey, 1989). This stage is driven by capital accumulation and industrial expansion, leading to the development of a central metropolis that functions as a growth centre, attracting a significant flow of skilled labour (Raagma, 2003). This phase is characterised by increased commercial activity and greater labour mobility, although peripheral areas remain largely unaffected. As Friedmann (1966) notes, the superior economic prospects offered by the dominant urban centre encourage migration from peripheral regions towards the core. The third phase, often called the industrial phase, is characterised by rapid economic growth and expansion, leading to the development of secondary growth centres. This spatial dispersion mainly results from rising labour and land costs within the dominant core region (Raagma, 2003). To reduce rural poverty and promote equitable growth, national governments often implement regional development policies during this phase (Jeffrey, 1989).

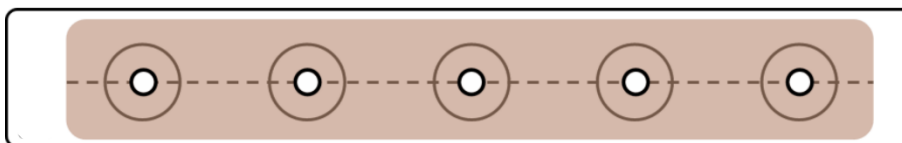
The establishment of new centres increases population movement and spatial interaction within the area as individuals commute over longer distances between home and work. Although the peripheral regions continue to decline, the development of these new centres helps expand the metropolitan area. This occurs alongside deconcentration in the central regions. The fourth phase, the post-industrial stage, demonstrates the geographical integration of the economy, in which regional equilibrium is established, leading to the system functioning through interdependence (Raagma, 2003). At this stage, the allocation of economic activities fosters specialisation across various centres, thereby reducing spatial inequality and promoting the flow of goods along transportation routes. This stage is characterised by organised complexity, national integration, optimal business location, and the absence of regional disparities (Friedmann, 1966). During this phase, the division of labour persists as various regions or nodes within the area specialise in specific functions, thereby enhancing inter-regional mobility, as noted by Raagma (2003).

Examination of the model shows that the urban centre immediately asserts dominance upon contact, thereby clarifying the hierarchical structures within urban systems. Friedmann's core-

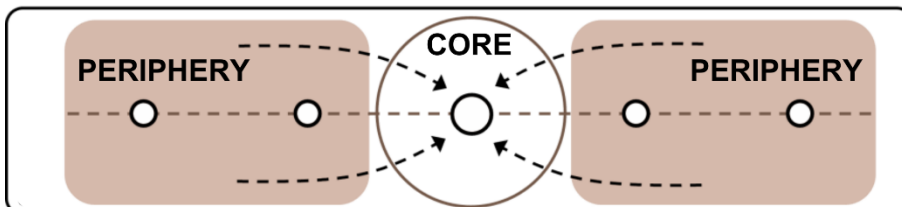
periphery model emphasises the dualistic nature and structural layout of a region, in which regional growth over time is explained by the interaction between the central core and the predominantly rural periphery. Richardson (1973) expanded on Friedmann's conceptual framework by revising the core-periphery model to reduce its reliance on neoclassical economic principles, international trade dynamics, and macroeconomic factors. Richardson (1973) argued that many previous models failed to reflect adequately the geographic heterogeneity within regions. Richardson's model included variables such as the rate of regional income growth, agglomeration effects, locational characteristics, spatial factors, material distribution, natural population growth rates, returns on labour and capital, a region's capacity for innovation absorption, and the level of communication with external nodes. Since its inception, the field of regional development studies has emphasised the link between nodal expansion and economic progress. Subsequent theoretical frameworks, especially Krugman's (1991) new economic geography, are underpinned by the core-periphery model. Figure 3.12 provides a visual overview of the core-periphery model.

Core-Periphery Model

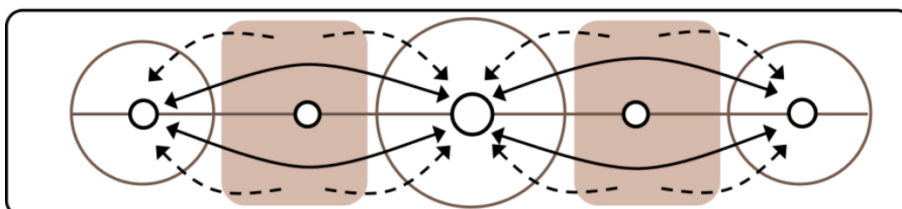
1 PRE-INDUSTRIAL



2 TRANSITIONAL



3 INDUSTRIAL



4 POST-INDUSTRIAL

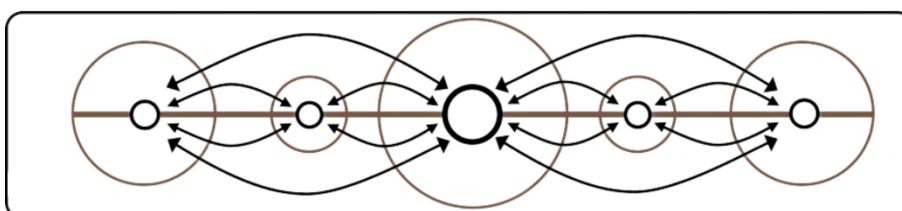


Figure 3.12: Core-Periphery Model

Source: Own construction, based on Friedmann (1966)

3.3.5 New Urbanism and Sustainable Development

New urbanism and sustainable development shape urban growth dynamics. New urbanism relates to the 'ideal' city structure and lays the foundation for sustainable development. Sustainable development, in turn, focuses on planning for the future of urban areas to achieve the Sustainable Development Goals (SDGs) set out in the Brundtland Report (1987). Furthermore, the Brundtland Report (1987) declared sustainable development a global priority, thereby influencing international planning policies and underscoring the importance of balancing environmental protection, economic advancement, and social well-being.

- **New Urbanism**

In 1980, Seaside, United States, was established as a model for new urbanism. The city's design prioritised mixed-use areas, pedestrian-friendly streets, and community participation, showcasing the potential to revitalise urban spaces and serving as an example for subsequent projects. In response to the limitations of car-dependent suburban expansion and the challenges contemporary urban planning faced in the mid-1980s, new urbanism gained recognition. The development of the *New Urbanism Charter* in 1996, which outlined core principles for urban planning and design, further formalised the movement (Talen, 2024). Since then, new urbanism has been adopted in cities such as New Orleans and Pittsburgh, United States, demonstrating its adaptability across various contexts and historical backgrounds. This flexibility illustrates how new urbanist principles remain relevant in modern urban development. The new urbanism theory emphasises mixed-use, transit-connected, and pedestrian-friendly environments that create integrated and sustainable communities (Fulton, 1996).

This movement centres on the idea that urban design can shape social patterns and support a utopian social ideal space (Day, 2003). The theory emerged in response to postwar suburbanisation, seeking to bring modern design principles to suburban communities and cities (Day, 2003). One of its main objectives is neotraditional planning, which promotes the revitalisation of cities' social values and physical layouts (Fulton, 1996). Examples include narrower streets to enhance social interactions and improved pedestrian connectivity between residential and commercial districts to increase walkability (Fulton, 1996). Although this approach offered promising solutions to suburban sprawl, new urbanism may yield greater benefits when integrated with broader planning initiatives and sustainable development (Ellis, 2002). Despite its

popularity as a progressive urban planning theory, new urbanism has faced criticism for failing to adequately address broader social justice and governance issues (Davies & Townshend, 2015).

- **Sustainable Development**

Sustainable development emerged from the need to balance environmental conservation, social equity, and economic growth, as recognised by the Brundtland Report of 1987. As urban planning theories become more complex and interdisciplinary, the concept has been divided into phases (Qian *et al.*, 2023). There are 17 Sustainable Development Goals (SDGs) aimed at achieving sustainable development. These goals were established by the United Nations in 2015 as part of a global framework to address urgent environmental, economic, and social issues by 2030. With their focus on a comprehensive approach to sustainable development and support from international law and policy, the SDGs build on previous international development initiatives. They are easier to incorporate into national agendas (Techera, 2025). Sustainable development is especially crucial in areas with high levels of inequality, poverty, and limited access to basic services such as education, healthcare, and clean water, as well as in regions most affected by climate change, including small island developing states, least developed countries, and sub-Saharan Africa.

Sustainability involves reducing waste and environmental harm while enhancing quality of life, including access to education, health services, open spaces, housing, and employment (McManus, 1998). Achieving sustainability requires that a city's environment and economy develop simultaneously across all levels of government (McManus, 1998). Sustainable development is generally defined as growth that does not threaten the resources available to future generations while meeting the needs of the current population (Wheeler, 2013). Its goal is to support long-term progress that preserves natural systems and avoids resource depletion (Wheeler, 2013). After numerous discussions and perspectives, sustainability can be categorised as either transformative, favouring significant changes over incremental adjustments to existing systems, or reformative, focusing on technological innovations and market expansion (McManus, 1998). The concept emphasises the need to balance economic growth, environmental preservation, and social justice (Wheeler, 2013). Figure 3.13 offers a visual summary of the idea of sustainable development.

Sustainable Development



Figure 3.13: Sustainable Development

Source: Own construction, based on Brundtland (1987)

3.4 Conclusion

Planning theories provide a conceptual framework for decision-making in urban and regional planning. These theories clarify the methods planners use to address societal issues, allocate authority, incorporate multidisciplinary knowledge, and involve stakeholders in the planning process. They also critically assess the effectiveness, flexibility, and inclusiveness of planning strategies across diverse contexts. Rational planning is characterised by a systematic approach that sets measurable objectives and conducts thorough data analysis. However, it has been criticised for its inflexibility and tendency to overlook key social, cultural, and political aspects (Webber, 1963). In contrast, incrementalism offers a more adaptable framework, focusing on gradual implementation through localised actions that address immediate needs and changing circumstances (Simon, 2018). Mixed scanning provides a hybrid model that combines long-term strategic goals with short-term operational decisions, thereby merging the strategic oversight typical of rational planning with the practical flexibility inherent in incrementalism (Etzioni, 1973).

Advocacy and equity planning emphasise protecting the rights and access to essential resources of marginalised groups. These frameworks support inclusive urban growth, guided by ethical principles and public participation in decision-making (Davidoff, 1965; Campbell, 2018). Communicative and collaborative planning approaches focus on dialogue, collective effort, and shared governance, helping to build consensus and develop adaptable strategies to address community needs and achieve broader societal goals (Healey, 1999; Healey, 2003). Procedural planning theories describe the shift from rigid, rule-based methods to flexible, inclusive, and socially aware approaches. These theories highlight the combination of technical skills, ethical issues, participatory processes, and decisions based on specific contextual factors. This framework helps planners create strategies that are responsible, adaptable, and fair, effectively addressing modern urban and regional challenges. Figure 3.14 offers a visual comparison of the planning theories discussed.

Planning Theory

PLANNING THEORY	CONTRIBUTION TO PLANNING	VISUAL EXAMPLE OF THE THEORY IN PRACTICE
Rational Planning	Promotes structured, data-driven, and accountable decisions	
Incrementalism	Supports gradual, adaptive, community-led planning over time	
Mixed Scanning	Combines rational analysis with flexible, step-by-step decision-making	
Advocacy Planning	Prioritise equality and diversity	
Equity Planning	Prioritises fair resource distribution and justice for all communities	
Communicative Planning	Involve the public in decision-making	
Collaborative Planning	Inclusive, participatory, consensus-driven planning approach	

Figure 3.14: Comparing Planning Theories

Source: Own construction, based on Webber (1963), Simon (2016), Etzioni (1973), Davidoff (1965), Campbell (2018), Healey (1999) and Healey (2003)

Theories in planning explain how cities function, grow, and interact with their surrounding ecosystems. These theoretical frameworks provide a structured understanding of urban and regional development, clarifying the factors behind urban expansion, land management approaches, and the role of transportation systems and infrastructure in shaping human settlements. The garden city theory proposes a model of sustainable urban development that combines the benefits of both rural and urban areas within decentralised urban centres, encircled by green belts (Howard, 1898). The sector model depicts urban growth along radial corridors, with land-use patterns and socio-economic groups organised into wedge-shaped sectors influenced by geographic and transportation factors (Hoyt, 1939). The central place theory emphasises the spatial arrangement of settlements, highlighting the importance of service areas, thresholds, and accessibility, which clarify the hierarchy of communities and their economic impacts (Christaller, 1933).

The core–periphery model explains regional development by linking economic growth to spatial arrangements, showing how economic activities are concentrated in core areas while peripheral regions change, influencing integration and fairness (Friedmann, 1966). New urbanism and sustainable development promote urban designs that are mixed-use, pedestrian-friendly, and environmentally sustainable to address urban issues (Day, 2003; Brundtland, 1978). These theories emphasise social interaction, fairness, environmental care, and strategic urban planning to ensure urban centres are prepared to meet both current and future needs. Substantive planning theories provide systematic approaches and principles that help planners make decisions based on empirical evidence. These theories address the complex nature of urban environments by integrating historical, economic, social, and environmental perspectives, thereby combining traditional and modern planning methods. This framework encourages balance among urban development goals, growth, equity, and sustainability, while enabling strategies to adapt to changing demands. Figure 3.15 offers a visual comparison of the different theories in planning.

Theory in Planning

PLANNING THEORY	CONTRIBUTION TO PLANNING	VISUAL EXAMPLE OF THE THEORY IN PRACTICE
Garden City Model	Create visually pleasing urban settings	
Sector Model	Cities grow in wedges along transport routes	
Central Place Theory	Explains settlement hierarchy and service distribution	
Core-Periphery Model	Core dominates; periphery depends economically	
New Urbanism	Encourage mixed-use and walkable neighbourhoods	
Sustainable Development	Establish a balance between social, economic and environmental goals	

Figure 3.15: Comparing Theories in Planning

Source: Own construction, based on Howard (1898), Christaller (1966), Hoyt (1939), Friedmann (1966), Day (2003) and Brundtland (1987)

CHAPTER 4 SPATIAL PLANNING

4.1 Introduction

To analyse planning practices across different contexts, it is essential to distinguish between strategic and statutory planning as key components of spatial planning. Spatial planning clarifies why and how planning legislation is formulated and how planning operates in practice. Exploring how the balance between strategic vision and statutory control influences sustainability, equity, and urban and rural development helps to understand the dynamics shaping contemporary planning practices. Figure 4.1 provides a visual overview of the division of spatial planning into strategic and statutory planning.

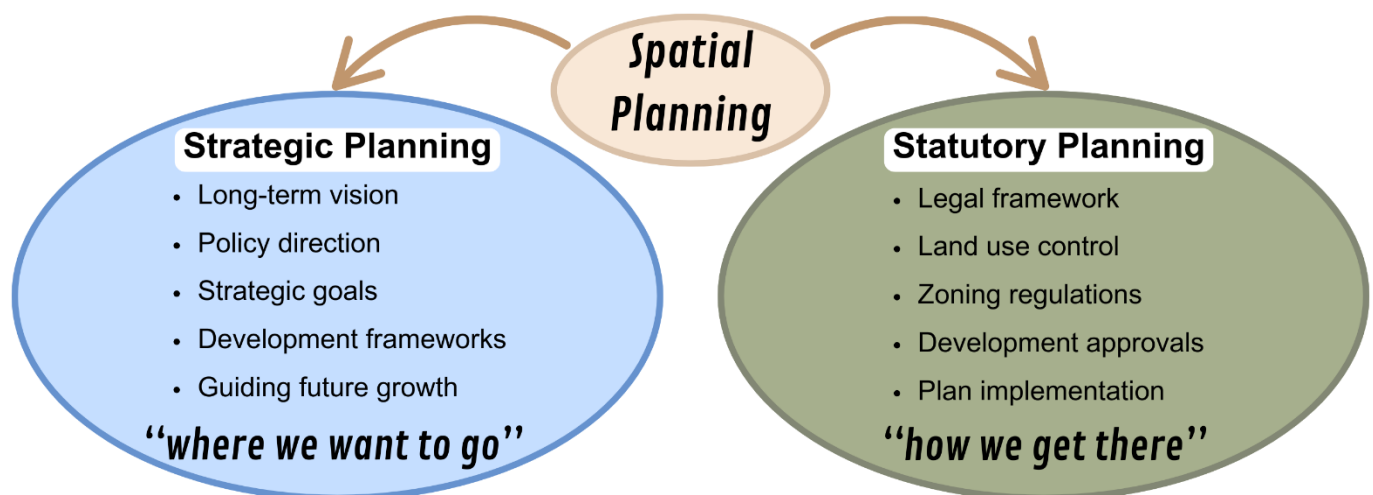


Figure 4.1: Spatial Planning: Strategic & Statutory

Source: Own construction, based on Mäntysalo *et al.* (2015)

Essentially, this chapter distinguishes between strategic planning, ‘where we want to go’, and statutory planning, ‘how we get there’. It offers a conceptual framework for analysing the evolution of spatial planning practices in South Africa and for systematically comparing South Africa’s current planning system with those of both developed and developing countries. In line with the study’s primary objectives, this chapter will form part of the foundational framework for analysing the impact of different practices on sustainability, equity and urban and rural development.

Specifically, this chapter focuses on: (i) clearly defining strategic and statutory planning, (ii) tracing their development and changing roles within planning systems, and (iii) clarifying the relationship between strategic policy vision and statutory legal enforcement (see Section 1.3, Objective i).

Additionally, strategic and statutory planning will be covered as separate sections in this chapter . Figure 4.2 provides a visual representation of the chapter's structural framework.

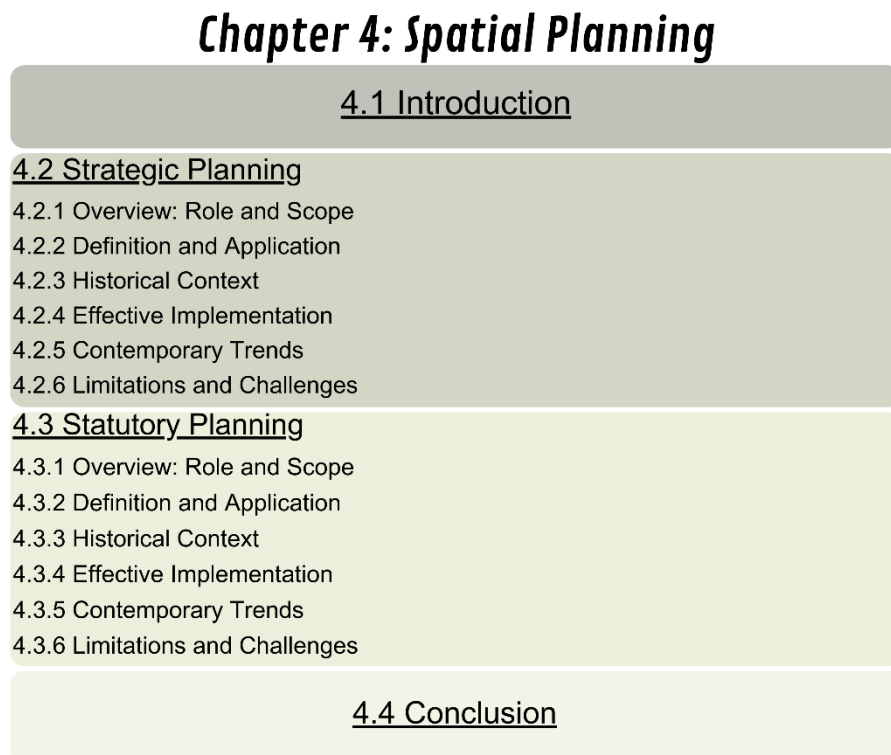


Figure 4.2: Structural Framework of Chapter 4

Source: Own construction

4.2 Strategic Planning

Strategic planning guides the actions and decisions of an institution or organisation (Hyslop *et al.*, 2004). It involves understanding every aspect of a specific group and goes beyond merely creating a plan (Hyslop *et al.*, 2004). In spatial planning, this approach notably focuses on integrating different planning policies, especially those related to cultural, social, economic and environmental aspects (Balducci, 2011).

The following sections explore strategic planning, providing detailed information on: (i) its role and scope, (ii) definition and application, (iii) historical context, (iv) effective implementation, (v) contemporary trends, and (vi) implementation challenges.

4.2.1 Overview: Role and Scope

According to Albrechts (2009), strategic planning should include the following components: (i) Long-term visions: developing long-term strategies to transform complex interactions into spatial

visions grounded in social values; (ii) Short-term actions: addressing issues swiftly to advance long-term objectives while building trust among participants; (iii) Stakeholder involvement: engaging relevant actors (political authorities, individuals, organisations, the corporate sector, and government departments) to secure foundational support and legitimacy, along with vital contributions and procedural skills; (iv) Citizen empowerment: a comprehensive and sustained process that involves citizens in key decisions, thereby supporting the development of knowledge, social capital, and intellectual capacity.

Salet and Faludi (2000) suggest that strategic planning can be divided into three main schools of thought, each seeking to reconcile traditional expectations of certainty and logic with the practical limitations encountered in real-world settings. These approaches focus on the effectiveness and validation of strategic processes in contexts involving multiple stakeholders: (i) The institutional approach: it combines sociological theories of institutions and regimes with planning principles, examining how normative biases and shifting public expectations shape planning choices; (ii) The communicative approach: it highlights strategic communication planning, emphasising framing and reframing social meanings, and using semiotics and linguistics to assess and reshape social images; (iii) The interactive approach: it stresses strategic management and planning within a multi-actor environment, involving public institutions and private entities, promoting collaborative networks and grassroots initiatives.

Albrechts *et al.* (2019) contend that strategic planning should rest on three interconnected pillars: (i) Co-production: collaborative political activity that transforms market democracy into a people-centred, bottom-up, linked democracy to foster a more equitable urban order; (ii) Imagining alternative futures: designing 'great new fictions' for plausible alternative futures by combining scientific, implicit, and experiential knowledge with critical consciousness and creativity; (iii) Addressing systemic injustices and asymmetries: empowering communities, recognising pluralistic societies, and ensuring the 'voiceless' are heard in the planning process. Figure 4.3 offers a visual summary of the components, schools of thought, and pillars of strategic planning.

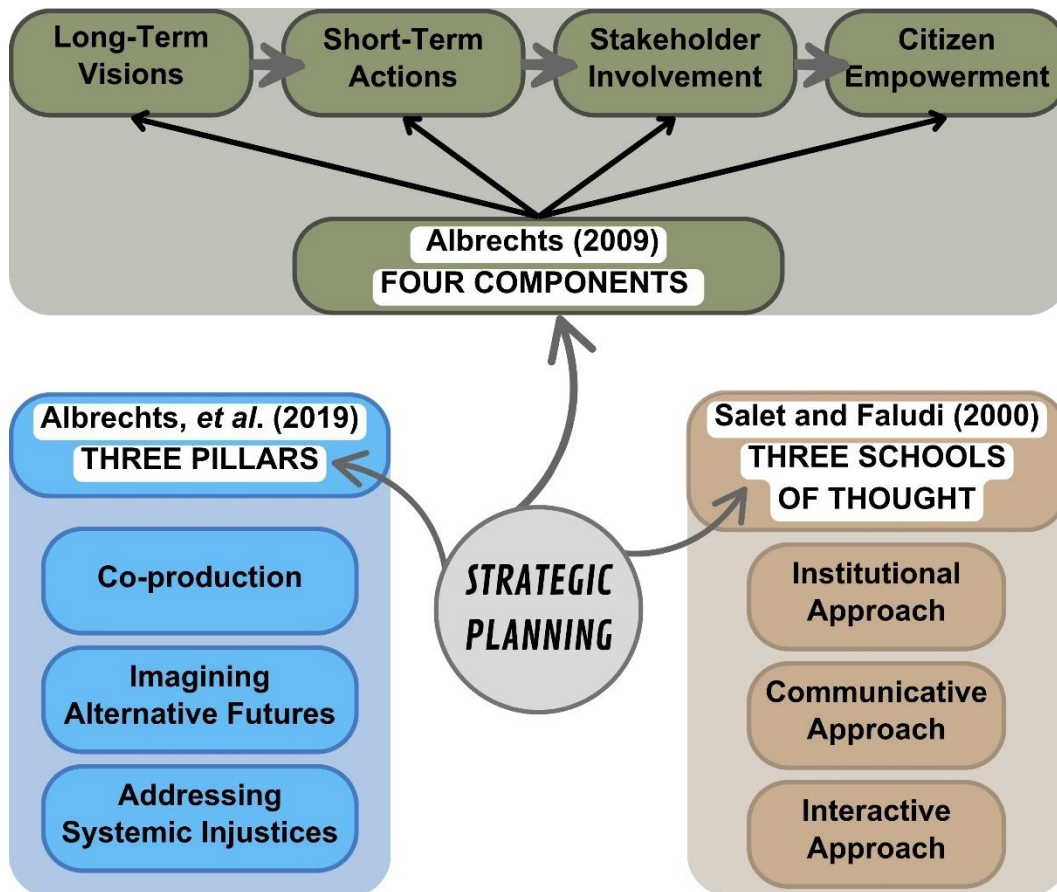


Figure 4.3: Components, Schools of Thought and Pillars of Strategic Planning

Source: Own construction, based on Albrechts (2009), Salet & Faludi (2000) and Albrechts *et al.* (2019)

4.2.2 Definition and Application

As noted by Sartorio (2005), the concept of a ‘strategy’ has its roots in military science, highlighting a long-term perspective among actors with differing aims. Strategic planning has introduced new concepts and methods, broadened the scope of spatial planning, and fostered better governance. Mäntysalo *et al.* (2015) define strategic planning as a shift from comprehensive, rationalist planning to visionary selectivity, emphasising choices and prioritisation over detailed data analysis. It is project- and action-focused, concentrating on implementation and observable results to build credibility and support long-term efforts.

Friedmann (1987) defines strategic planning as the link between theory and practice in applying knowledge to spatial planning. Flyvbjerg (2014) notes that strategic planning combines practical knowledge and strategic thinking to address complex spatial challenges. Hall (2014) observes that strategic planning is forward-looking, considering the challenges and trends shaping urban development. Faludi (2000) describes strategic planning as a logical, comprehensive approach

to urban development, while Friedmann (1987) emphasises it as an advanced decision-making process that links public-sector operations with practical and scientific knowledge. Faludi (2000) identifies two types of plans: (i) Project plans, which are blueprints for specific outcomes with fixed futures and predetermined effects; and (ii) Strategic plans, which are ongoing, transparent, and suggestive, coordinating choices and activities among diverse parties, assisting decision-makers, and fostering momentum for transformative change.

Flyvbjerg (2014) argues that effective strategic planning prioritises project development through transparency and participation, while Faludi (2000) claims that success depends on achieving goals and providing a practical framework for decision-making. Strategic planning frameworks help decision-makers understand the context and make well-informed choices, thereby promoting democracy and reducing project-related conflict (Flyvbjerg, 2014). Hall (2014) emphasises that strategic planning redefines city form, shifting from construction and design to management, focusing on efficiency, sustainability, and quality of life. Healey (2003) highlights collaboration, relational thinking, and co-production in dynamic governance environments, framing strategic planning as governance rather than management.

Strategic planning involves operational logic, spatial planning models, and governance (Hall, 2014). In market economies such as the United States, it promotes socially rational decisions, in contrast to earlier, orthogonal planning methods (Friedmann, 1987). Healey (2003) notes that strategic planning was sometimes abandoned as a barrier to market efficiency, leading to regulatory steering in its place. Effective strategic planning addresses key issues in spatial development at the regional and national levels, requiring a comprehensive, multidisciplinary, and multisectoral approach (Hall, 2014). It guides property and land development by establishing regulatory standards and policies (Healey, 2003), resolving market inefficiencies, and developing robust spatial frameworks. Incorporating project management within broader objectives is essential (Flyvbjerg, 2014), while Friedmann (2004) highlights evaluation, scenario analysis, goal setting, resource assessment, and implementation methods.

Consequently, strategic planning encourages cooperation in decision-making among government agencies and stakeholders, as a participative and inclusive approach to spatial planning can help shape perspectives and influence social ideas and beliefs (Balducci, 2011). It is essential to plan for long-term growth; therefore, this method highlights the need to apply spatial logic when undertaking land use planning or resource management (Hyslop *et al.*, 2004). Recognised as a dynamic process, strategic planning can take various forms depending on the context and objectives, such as positions, methods, or plans (Hyslop *et al.*, 2004). Overall, this approach emphasises addressing complex spatial planning issues (Balducci, 2011) and focuses on how

these challenges enhance decision-makers' understanding of current and future issues rather than on producing tangible outcomes.

Consequently, strategic planning prioritises a deeper understanding of challenges to improve decision-making processes rather than developing a specific strategy (Faludi, 2000). Strategic planning is considered a set of concepts, approaches, and tools that can be adapted to suit the planning needs of modern countries and local communities (Sartorio, 2005). According to Friedmann (2004), the planning literature lacks a clear definition of strategic planning. As a result, the definition of strategic planning can vary depending on the specific planning context. Despite different interpretations, several consistent elements emerge, such as the importance of long-term planning, the participation of multiple actors, a broad range of stakeholders and motivations, interactivity, process orientation, and interconnectedness (Sartorio, 2005). Figure 4.4 offers a visual summary of the definition of strategic planning.

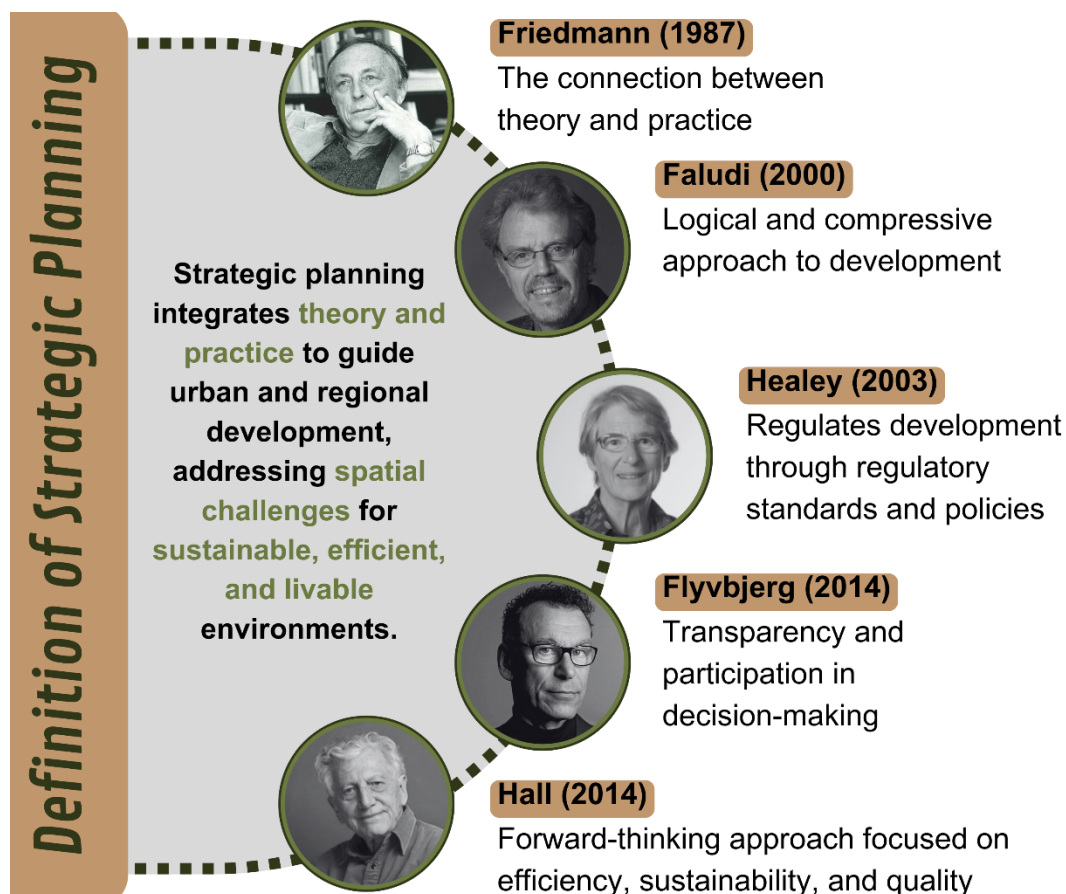


Figure 4.4: Definition of Strategic Planning

Source: Own construction, based on Friedmann (1987), Faludi (2000), Healey (2003), Flyvbjerg (2014), and Hall (2014)

4.2.3 Historical Context

Initially rooted in military strategies for achieving ultimate objectives amid changing environments, strategic planning later transitioned into the business sector. With master plans devised at the city level to manage urban growth and a primary focus on physical patterns and urban architectural design, spatial policy led the development of strategic planning (Salet & Faludi, 2000). Strategic planning is a multidimensional process in which stakeholders collaborate to create a vision. Consequently, power dynamics and governance systems influence this approach, resulting in institutional and socio-political complexities (Larsson, 2006). Mastop (1998) argues that strategic planning originated in the global north during the 1920s and 1930s. At that time, it was regarded as a complex process rather than merely a long-term development plan. However, Tošić and Živanović (2014) found that, over time, strategic planning became more popular in the developed world because of its focus on creating dynamic plans for sustainable, balanced spatial development. With the introduction of the welfare state in the early 1960s, its use in the public sector, especially in spatial policy, began to grow. By the late 1960s, land use planning was significantly influenced by strategic planning, and Hirschman (1964) argued that, given the era's multiple challenges, some level of regional and national growth inequality was unavoidable and even beneficial.

Albrechts (2004) suggests that strategic planning evolved into comprehensive planning during the 1960s and 1970s. Albrechts *et al.* (2019) contend that planning systems have remained essentially unchanged since the 1970s and tend to focus on maintaining the existing social-spatial order rather than questioning or transforming it. They operate through carefully stage-managed procedures that often restrict discussion and opposition. These methods typically fail to capture the complex dynamics and tensions within these locations. Generally, they are less visionary and more oriented towards practical discussions within a political rationality centred on the market (Albrechts *et al.*, 2019). Conversely, Mallory *et al.* (1983) describe strategic planning at that time as formal and guided by unwritten principles. Additionally, as Albrechts (2006) notes, various scientific studies published in the early 1980s encouraged governments to adopt strategic planning approaches common in the developed world. However, during the late 1980s, a wave of neoliberal planning policies spread across several countries, causing planning approaches to lose political favour. As a result, strategic planning gained global recognition in the 1990s (Olesen, 2023).

During this period, strategic planning began to focus on developing additional housing, business park locations, urban transformation initiatives, and infrastructure investments (Allmendinger & Haughton, 2012). Due to postmodern scepticism and neoconservative disdain, comprehensive

planning declined in the 1980s, shifting towards projects and land-use regulations (Albrechts, 2004). After 1992, strategic planning became a popular theoretical approach. As a result, the literature began seeking empirical evidence of its implementation while mainly developing theoretical frameworks centred on the goals of strategic planning (Oliveira *et al.*, 2018). Greenley (1994) emphasised that country-specific variables, such as culture, business conditions, and trade factors, can influence national differences in strategic planning, despite the idea that strategic planning principles should be universally applicable. On a related note, Hall (1997) argued that the evolving nature of cities is primarily driven by the property and real estate industries, which typically do not benefit underprivileged communities. Due to increasing complexity, rapid development, fragmentation, environmental concerns, and the need for long-term thinking, strategic approaches regained popularity by the end of the millennium. This new wave emphasises the creation of shared futures, fostering common assets, ensuring accountability, and integrating strategic ideas with immediate actions (Albrechts, 2004).

The importance of strategic planning as a collaborative process involving local and regional transportation, economic, and agricultural agencies, all contributing to more sustainable land management practices, was first highlighted after 2000 (Luukkonen, 2011). Since 2003, there has been ongoing debate about the complex links among land-use planning, property development, and strategic planning (Stead, 2012). Hall (2005) argued that there are two types of cities: those capable of sustaining dynamic growth and those that are disadvantaged and grow at the expense of informality. In some cities with limited planning resources, informality is commonly used as a solution to urbanisation. However, because informality often leads to low-density growth and unplanned expansion, it places additional financial strain on cities. In such contexts, some cities develop undeveloped land to prevent the spread of informality rather than establishing green open spaces (Freire, 2006). Despite national and local policies aimed at avoiding urban development in disaster-prone areas, a lack of long-term planning can lead to rapid urban growth and sprawl. Underprivileged communities are undoubtedly the most vulnerable to natural disasters; therefore, strategic plans must include effective risk management. By 2006, governments increasingly relied on medium- and long-term plans (Falshaw *et al.*, 2006), as strategic planning fostered a mindset, supported institutions, and introduced long-term reflection to aid city development (Holden, 2006). Figure 4.5 below presents the historical development of strategic planning.

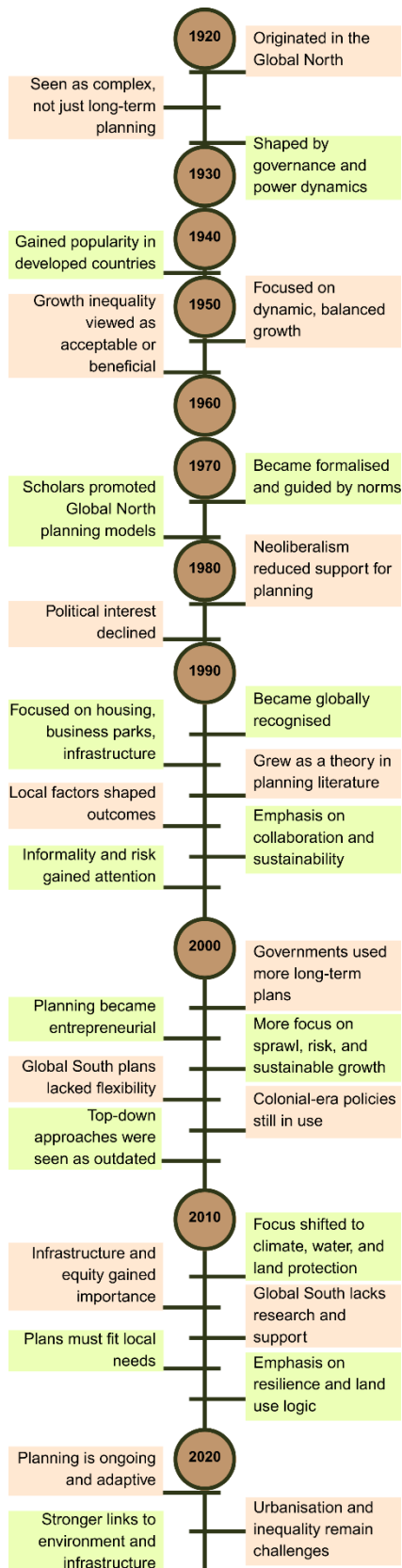


Figure 4.5: Historical Development of Strategic Planning

Source: Own construction, based on Oliveira *et al.* (2018)

4.2.4 Effective Implementation

The unifying aims of strategic planning have since been to develop a coherent territorial development plan to guide the medium- and long-term growth of urban areas, and to establish a comprehensive spatial logic for land use, natural resource valuation, and major infrastructure projects such as transport and housing (Wilson, 2006). However, comprehensive land-use allocation models have now been replaced by more optimistic strategic plans that incorporate the spatial dimension of sectoral goals. This process requires creative thinking, defined as the ability to produce distinctive concepts and ideas that are not immediately perceptible to the senses (Phelps & Valler, 2024). Nonetheless, Freire (2006) identified issues faced by countries in the global south: (i) strategic planning initiatives that lack flexibility and adaptability to changing circumstances; (ii) long-term plans that are unsustainable for future development; (iii) strategic plans that do not balance economic growth with environmental sustainability; and (iv) difficulty in maximising the limited resources available to local governments. Consequently, globalisation will continue to shape the consumption and production patterns of the global south, leading to regional capitals evolving into global megacities (Freire, 2006).

Given the ineffectiveness of strategic planning across contexts, Elbanna (2008) outlined criteria for assessing its success: (i) helping stakeholders understand how current decisions affect future development; (ii) ensuring alignment between internal capabilities and the external environment; (iii) encouraging stakeholder commitment to the strategy; (iv) promoting sustainable development; and (v) enhancing planning effectiveness in achieving goals. Faludi (2000) argues that strategic planning should be evaluated on its ability to support decision-making rather than on its alignment with expected material goals, including: (i) illustrating the options available to stakeholders to influence subsequent decision-making contexts; (ii) recognising and maintaining relevance to operational decisions; and (iii) affecting how decision-makers engage with plans, whether by adherence or deviation. Research conducted in Japan, Australia, Canada, the United Kingdom, and the United States has produced planning frameworks effective for countries with similar economic conditions; however, they are inadequate in other contexts, as demonstrated by Elbanna's (2008) research in Egypt and similar studies in the UAE, Bahrain, Saudi Arabia, Jordan, Turkey, and South Africa (Suklev & Debarliev, 2012).

Glaister *et al.* (2009) found that some countries were more committed to implementing strategic plans than others, suggesting that positive perceptions may reflect institutional shortcomings and market inefficiencies. Given the widening gap between current planning policies and the growing challenges of poverty, inequality, informality, rapid urbanisation, and spatial fragmentation (Watson, 2009), planning authorities such as UN Habitat (2009) are re-evaluating their roles and

predicting that a significant proportion of the global population will live in urban areas, with the global south contributing most to the projected population increase. Watson (2009) observed that historically, the global north has exerted substantial influence over the global south in shaping planning theory and practice. Planning methods were inherited from colonial governance or imported from the global north to serve specific ideological and political purposes at the local level. Despite notable changes in the environmental context, many of these inherited practices remain largely unchanged, emphasising the need for ongoing review to ensure planning policies adapt to evolving environmental conditions. Top-down planning approaches are considered outdated and inadequate given 21st-century governance standards and rapid urban growth.

Albrechts (2009) highlights the importance of a multi-level governance framework that recognises diverse power structures and institutional contexts, while integrating top-down policies with bottom-up local distinctiveness. Watson (2009) argues that many developing countries' planning systems are ineffective, but challenges cannot be attributed solely to planning systems. Regular updates to strategic plans are essential for tackling the issues faced by rapidly developing and underdeveloped urban areas. Albrechts (2009) promotes a proactive approach, emphasising 'transformative practices' that involve creating and implementing visions of expected outcomes through an integrated socio-spatial process led by the public sector. Implementation depends on strategic projects coordinated with the private sector to transform a place's geographical, economic, and socio-cultural fabric by combining visions from multiple policy sectors and engaging local citizens.

Boonstra and Boelens (2011) highlighted deteriorating environmental conditions in the global south. Since then, strategic planning has shifted towards environmental concerns such as water management (Scolozzi *et al.*, 2012) and climate change (Mascarenhas *et al.*, 2012). Globalisation, technology, deregulation, and the opening of new markets require complex strategic planning for survival and success, with infrastructure shaping urban spatial layout, sustainability, and inclusivity (Suklev & Debarliev, 2012; Todes, 2012). Strategic planning is increasingly recognised as a social endeavour that produces social constructs, acting as 'frameworks for action' that balance local identity preservation with broad structural reforms (Phelps & Valler, 2024; Kunzmann, 2013). Oliveira *et al.* (2018) identified strategic planning initiatives with objectives such as: (i) mitigating urban expansion into agricultural land (Rega & Bonifazi, 2014); (ii) reducing environmental degradation (Cremer-Schulte, 2014); (iii) balancing urban and rural development (Geneletti, 2011); and (iv) promoting sustainable rural development.

4.2.5 Contemporary Trends

Since the 2007–2008 financial crisis reduced the perceived importance of strategic planning and made it difficult to maintain political support, Olesen (2023) argues that addressing current issues, such as the energy crisis, is vital for regaining political backing and demonstrating the practical effectiveness of the approach. Strategic planning involves complex, often abstract ideas, as it must balance the needs of different stakeholders, navigate social complexities, and operate within traditional planning system constraints. Furthermore, Källström and Smith (2023) suggest that developing a shared vision becomes increasingly complex as the number of stakeholders grows, since their often-diverse perspectives require sense-making efforts to manage uncertainties and develop an integrated planning approach. Current institutional frameworks, which often restrict strategic planning to physical space (Dross *et al.*, 2012), face difficulties in implementing a unified strategy due to differences in national practices, potentially leading to inefficiencies and miscommunication (Walsh & Allin, 2012). Dross *et al.* (2012) note that prioritisation can become confusing for planners when balancing short- to medium-term implementation needs with long-term strategic objectives, especially as rapidly changing global issues such as population growth and climate change further complicate planning practices, demanding adaptable approaches (Albrechts, 2009).

Neoliberal governance limits strategic planning because of its limited influence over market forces, creating a gap between planning objectives and market realities and complicating implementation. Olesen (2014) explains how neoliberal policies have reduced or eliminated the effectiveness of strategic planning at various levels of government. Because of a focus on market forces rather than strategic planning aims, reactive planning approaches are more common than proactive ones, limiting the ability of this approach to influence urban growth (Olesen, 2014). Dross *et al.* (2012) argue that current institutional frameworks often confine spatial planning to managing physical space, thereby ignoring broader socio-economic factors that shape market dynamics. McFarlane *et al.* (2015) contend that intersectoral collaboration is essential for developing practical solutions; however, many governance frameworks fail to foster such cooperation, leading to fragmented efforts. Despite these obstacles, degrowth approaches that emphasise societal needs over market interests can be incorporated into strategic planning through adaptable economic models, potentially improving the relevance and effectiveness of addressing contemporary urban issues (Savini, 2024).

The localised approach to planning has hindered spatial thinking, while a prolonged period of austerity has weakened planning functions. Consequently, strategic planning initiatives have faced criticism, and anti-growth attitudes often lead to incremental rather than radical changes

(Phelps & Valler, 2024). Strategic planning also becomes more challenging because of factors such as political legitimacy, resource disparities, and the complex nature of spatial imbalances, which result in unequal outcomes. Differences in financial, social, and institutional resources highlight distinctive administrative approaches in spatial planning and emphasise contrasts between urban and peripheral areas, maintaining inequalities as marginalised groups encounter difficulties engaging in decision-making processes (Bertrand *et al.*, 2015). The irregular distribution of vital services further complicates contemporary planning, especially in smart cities, by reducing walkability and accessibility and causing inequalities in health, education, and overall well-being among urban populations (Du *et al.*, 2021; van Ham *et al.*, 2024). Technocratic approaches often harm political discourse, making it harder for planners to rebuild public trust and support (Olesen, 2023). However, neoliberal governance reforms have prioritised market facilitation over long-term land-use goals, preserving existing power structures and possibly limiting strategic planning's ability to tackle key urban issues such as housing and environmental sustainability (Olesen, 2014; Morrissey *et al.*, 2018).

4.2.6 Limitations and Challenges

Problems in implementing strategic planning that hinder its ability to address urban issues effectively stem from factors such as community engagement, political legitimacy, and governance frameworks. Developing comprehensive governance frameworks across multiple levels and sectors can be complex, but they are vital for effective strategic planning (McFarlane *et al.*, 2015). Because selective community participation can hinder planning processes, full public involvement is essential for the successful implementation of strategic initiatives (McFarlane *et al.*, 2015). However, entrepreneurial planning models can neglect community needs, resulting in a mismatch between local conditions and strategic goals (Albrechts, 2017). Overemphasising stakeholder consensus can hinder progress on critical urban issues by obstructing effective decision-making and implementation. Prolonged debates and pressure to rapidly transition to renewable energy infrastructure can cause delays and complicate governance (Olesen, 2023). Striving for broad community participation can also make cross-sectoral governance more challenging, leading to delays and disagreements (McFarlane *et al.*, 2015). Difficulties in integrating different stakeholders' viewpoints might result in compromises that fail to address core issues, and an excessive focus on consensus can limit strategic planning's flexibility and hinder the adoption of proactive approaches (Albrechts, 2013; Dross *et al.*, 2012; Albrechts, 2017). While consensus can enhance credibility and community engagement, it may also overlook the need for realistic, timely solutions in rapidly changing urban environments.

The effectiveness of strategic planning is further limited by institutional and political barriers, including inflexibility, evolving governance systems, and a decline in legitimacy. Existing frameworks that limit planning to physical aspects while overlooking broader functional and process-driven factors create institutional obstacles (Dross *et al.*, 2012). Complex networks created by governance transitions complicate planning, and the interaction between informal and formal governance spheres in decentralised settings can disrupt initiatives (Ward, 2019). Consequently, strategic planning has evolved alongside statutory planning in post-socialist cities, supporting resource mobilisation and gaining political backing (Tsenkova, 2007). Strategic planning tends to be defensive, reactive, and limited by context, which hampers direct implementation. Building relationships with other stakeholders and investing in new developments and developer insights are crucial for success. However, innovative planning has shifted towards the private sector (Salet & Faludi, 2000; Phelps & Valler, 2024). The lack of effective monitoring and evaluation systems makes it hard to assess the real impact and effectiveness, and local governments often neglect these aspects, which diminishes project success (Phelps & Valler, 2024).

Reliance on technical knowledge can create a gap between planning processes and community expectations, potentially marginalising democratic participation. Formal strategic plans often serve political functions rather than providing detailed guidance, and an excessive focus on documentation can divert attention from the process, alter relationships between actors, and prolong preparation periods (Friedmann, 2004; Balducci, 2011). Rapidly changing real-world events frequently render plans obsolete, casting doubt on their practical usefulness (Friedmann, 2004). Effective implementation requires multisectoral governance and active community engagement, but technocratic systems prioritising expert decision-making often undermine these goals (McFarlane *et al.*, 2015). Balancing the effectiveness of technology with participatory governance and local representation is essential. Fragmented territorial structures can cause contextual mismatches, hindering the achievement of strategic objectives. Actions that deviate from established narratives hinder policy alignment, and the absence of enabling frameworks across cities prevents strategic plans from addressing current spatial realities (Walsh & Allin, 2012). Unequal resource distribution between urban and rural areas further widens territorial disparities and weakens planning effectiveness, highlighting the need for adaptable frameworks that consider diverse local constraints while pursuing long-term, integrative goals (Bertrand *et al.*, 2015).

4.3 Statutory Planning

Statutory planning is a crucial element of spatial planning, encompassing detailed, legally mandated procedures that govern land use and development. This approach focuses on developing and implementing legislation, policies, and plans that shape the social and physical environments of urban areas (Lichfield & Prat, 1998). Specifically, statutory planning refers to the legal framework and orderly process used to regulate spatial growth, adopting a balanced approach that considers social, economic, and environmental factors to promote the harmonious development of cities and regions.

The following sections explore statutory planning, providing detailed information on: (i) its role and scope, (ii) definition and application, (iii) historical context, (iv) effective implementation, (v) contemporary trends, and (vi) implementation challenges.

4.3.1 Overview: Role and Scope

Statutory planning influences spatial planning across political, economic, and social dimensions. It has a complex political impact on government decisions, economic development, and public participation (Fruchtman, 1986). It provides a framework for shaping policies, making decisions, promoting sustainable development, and balancing competing interests. Consequently, this approach can be viewed as a valuable government tool, as it enables authorities to implement policies that benefit the public (Harwood, 2011). Defining the limits of urban expansion and guiding resource development are areas where political influence is most significant (Fruchtman, 1986). This is particularly evident in regional planning, where planners must navigate complex political environments while advocating for community needs and public spaces (Tewdwr-Jones & McNeill, 2000). To safeguard public spaces from neoliberal urban developments, planners often act as advocates for marginalised communities. They are encouraged to adopt inclusive and democratic planning processes that consider the interests of all stakeholders (Özdemir, 2023). Urban governance has shifted towards a regional approach, emphasising collaboration among stakeholders and across governmental levels (Tewdwr-Jones & McNeill, 2000).

Statutory planning frameworks support strategic policymaking, enabling regions to tackle economic and environmental issues more effectively (Frank & Marsden, 2016). However, limiting urban expansion could hinder marginalised communities' ability to adapt to shifting economic conditions, particularly in resource-dependent regions (Harwood, 2011). The political dynamics of statutory planning can either promote or hinder economic development, depending on the government in power (Allmendinger & Tewdwr-Jones, 1997). Therefore, statutory planning has an economic impact on community welfare, development opportunities, and resource allocation.

Because it oversees land use and development, it is essential for maximising resource allocation and enhancing economic efficiency (Fruchtman, 1986). This approach ensures that economic activity aligns with broader social and environmental goals by providing a framework for regulating land use and development. It involves managing development, promoting industrial growth, and ensuring that necessary infrastructure is accessible (Pinson, 2007).

This is particularly important in resource-dependent economies, where development often relies on spatial planning. Statutory planning ensures that land is used as efficiently as possible to deliver economic benefit, thereby facilitating the effective allocation of limited resources (Fruchtman, 1986). However, rigid limits on urban growth could reduce the financial benefits of nearby developments, potentially harming vulnerable areas (Harwood, 2011). By ensuring that essential infrastructure is in place, effective statutory planning can lower development costs, thereby attracting investment and driving economic growth (Adams *et al.*, 2016). Incorporating ecological considerations into statutory planning can promote an economy that benefits the environment, enhancing regional sustainability and competitiveness. To ensure long-term economic viability, a multilevel governance approach can help integrate sustainable practices within regulatory frameworks (Frank & Marsden, 2016).

Overall, the social importance of statutory planning is increasingly recognised as vital for developing inclusive and sustainable communities (Harwood, 2011). Statutory planning promotes public participation, enabling communities to express their wants and needs during the planning process. As a result, the legitimacy and acceptance of planning decisions grow when various stakeholders collaborate more effectively through interactive governance frameworks (Lingua, 2020). To manage resources efficiently, statutory planning integrates ecological considerations into urban design and promotes methods such as water-sensitive urban design (WSUD) (Williams, 2020). According to Frank and Marsden (2016), the shift towards viewing regions as socio-ecological places underlines the importance of ecological resilience and sustainable land management. Particularly in marginalised communities, strict urban expansion boundaries can worsen inequality by hindering residents' ability to adapt to new economic opportunities. To ensure that all communities benefit from regional development and to foster social resilience and cohesion, statutory planning must address these inequalities (Harwood, 2011). Figure 4.6 illustrates the political, economic, and social roles of statutory planning.

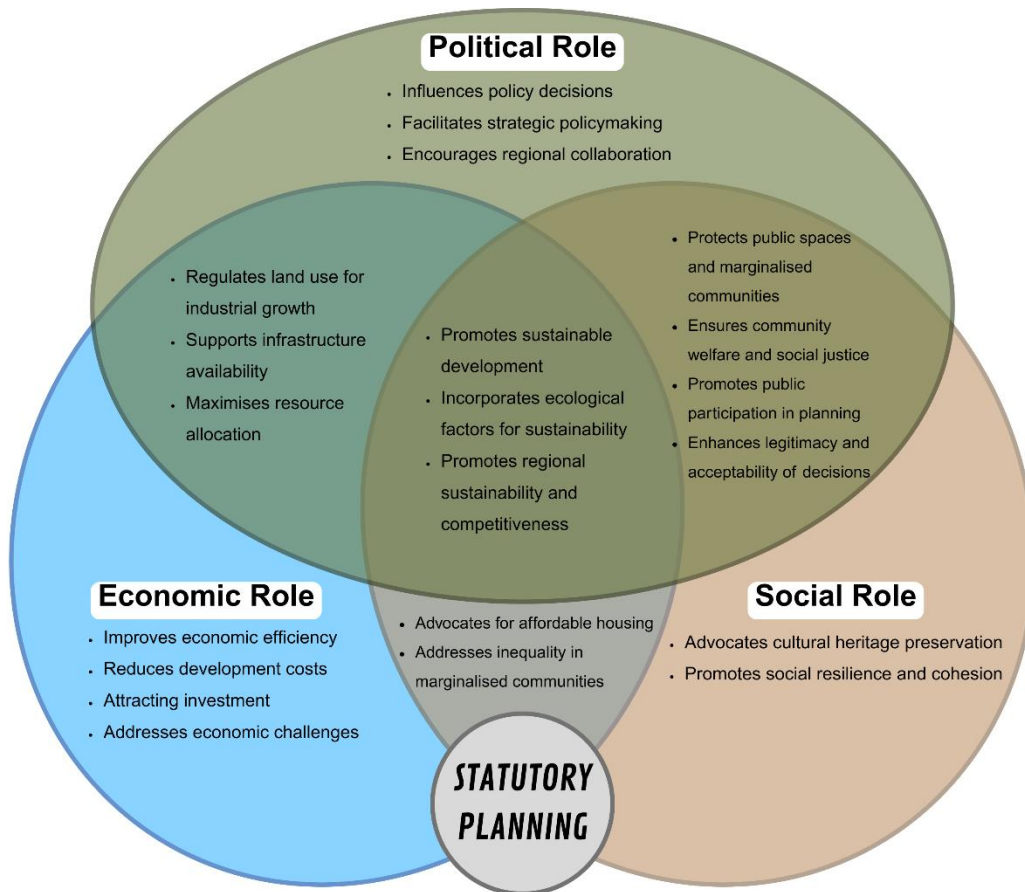


Figure 4.6: The Political, Economic and Social Role of Statutory Planning

Source: Own construction, based on Harwood (2011)

4.3.2 Definition and Application

Statutory planning is a crucial aspect of spatial planning, encompassing detailed, legally binding procedures that regulate land use and development. This approach focuses on creating and enacting legislation, policies, and plans that shape the social and physical aspects of urban areas (Lichfield & Prat, 1998). More specifically, statutory planning provides the legal foundation and a structured process for managing spatial growth, adopting an organised approach that considers social, economic, and environmental factors to foster the harmonious development of cities and regions (Harwood, 2011). This approach encompasses resource allocation, infrastructure development, the protection of cultural and natural resources, and land-use regulation (Williams, 2020).

Statutory planning comprises several key components that, together, ensure proper governance of spatial planning: (i) public participation (Fruchtman, 1986), (ii) regulatory tools (Williams, 2020), (iii) development plans and policies (Lichfield & Prat, 1998), and (iv) legal frameworks (Ajhara & Bastian, 2023). Nonetheless, several fundamental components that ensure both success and

equity influence its efficacy: (i) enforcement mechanisms (Williams, 2020), (ii) administrative processes, and (iii) legal foundations (Ajhara & Bastian, 2023). Statutory planning, also known as regulatory planning or development control, refers to formal legislative frameworks that govern land use and development. Accordingly, planning legislation, regulations, and local planning schemes guide its principles. This approach is characterised by: (i) adherence to planning acts, zoning laws, and land use ordinances; (ii) ensuring that new developments comply with legal, zoning, and environmental standards; and (iii) reviewing applications for development permits, zoning variations, and building approvals.

Additionally, statutory planning is essential to spatial planning, ensuring safety and compliance with environmental standards, promoting organised development, safeguarding the public interest, and mitigating land-use conflicts (Harwood, 2011). Land-use planning involves systematically assessing land and water potential, alternative land uses, and social and economic conditions to select and implement the most suitable options that meet human needs while conserving resources for future generations (Metternicht, 2017). The traditional top-down, expert-led approach to land-use planning has shifted towards a more integrated, participatory model that incorporates sustainability factors, including social acceptance, economic viability, physical compatibility, and environmental sustainability. Therefore, land-use planning is considered part of statutory planning (Metternicht, 2017). Land utilisation, governance, and tenure are interconnected factors that influence land-use planning. Poor governance, for instance, can significantly hinder effective land-use planning, leading to land conflicts and environmental damage (Metternicht, 2017).

Overall, statutory planning prioritises environmental sustainability, community participation, and social justice. This approach also promotes social welfare by ensuring that development projects meet the needs of all community members (Fruchtman, 1986). This includes conserving cultural heritage, advocating for social justice, and providing affordable housing (Ajhara & Bastian, 2023). The framework provided by statutory planning guides urban growth while considering ecological and social demands. A key tool for sustainable land management (SLM), land use planning (LUP) directs development away from environmentally vulnerable areas. It promotes the preservation of agricultural land, natural ecosystems, water resources, and biological corridors. It also helps reduce urban sprawl and dependence on cars, supports biodiversity conservation, green infrastructure, and ecosystem restoration, and aligns land use with land capacity. By improving land tenure security, clarifying customary rights, and enabling inclusive, multi-stakeholder engagement in planning decisions, LUP enhances economic prospects and strengthens land governance (Metternicht, 2017). Figure 4.7 offers a visual summary of the definition of statutory planning.

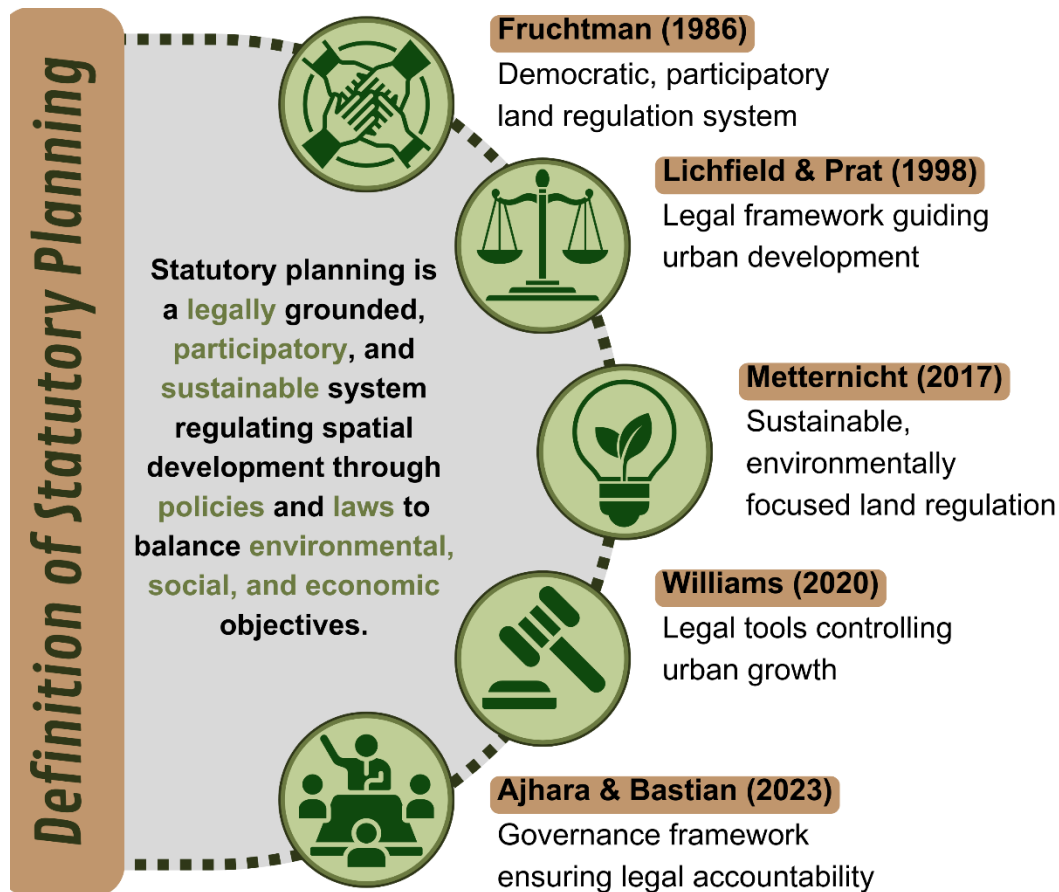


Figure 4.7: Definition of Statutory Planning

Source: Own construction, based on Fruchtman (1986), Lichfield & Prat (1998), Metternicht (2017), Williams (2020) and Ajhara & Bastian (2023)

4.3.3 Historical Context

The planning movement in the United States adopted zoning practices that were first introduced in Germany in the late 19th century. The reform era that established zoning in Germany provides a valuable foundation for evaluating the development of early zoning regulations in the United States (Logan, 1976). These two countries therefore hold significant historical importance, as Germany is widely regarded as the origin of modern zoning practices, while the United States formalised and institutionalised zoning, particularly through the 1916 New York City Zoning Ordinance.

- **Zoning in Germany**

Rapid population growth, both overall and in urban areas, along with ongoing urban structural changes, significantly impacted Germany during Europe's industrialisation in the 19th century (Chaney, 2022). Slums and modifications to the medieval layout and organisation of German cities resulted from the rapid rise of a poor, industrialised working class, fuelled by socialist ideas

spreading across Europe, as well as other aspects of urban growth (Logan, 1976). These conditions prompted a variety of reform ideas in Germany; many were directed at less conservative city administrations (Bentlin, 2023). Urban reformers focused on improving living conditions for the working class but also recognised the inefficiency and disruptions caused by increasing urban growth (Logan, 1976).

During the 1850s and 1860s, reform proposals sought to remove government restrictions on the housing market and establish cooperative building societies to help working families build suitable housing. Despite their focus on housing, prominent German planners such as Sitte (1965) primarily concentrated on urban structure and aesthetics. Nonetheless, they shared concerns about living conditions and were interested in both the practical and aesthetic aspects of urban planning. Economic liberals attributed high costs and overcrowding to high land taxes, building codes, and restrictions on the free movement of labour and capital (Kötter, 2018). In the 1890s, Eberstadt (1894) argued that rising land costs were primarily caused by the ability to develop at high density.

As a result, zoning restrictions to control development density were introduced (Bentlin, 2023). Later, Baumeister (1936) examined the trend towards the increased isolation of economically distinct land uses. Consequently, industries tend naturally to cluster together, and Lainton (2021) argued that cities should therefore be divided into three zones: industry and retail with worker housing; trades requiring direct public contact with workers' homes; and residences without trade and with diverse employment. Baumeister (1936) predicted that zoning restrictions would significantly shape the layout of roads and blocks, which were considered standard in earlier times.

Thus, German planners recognised and addressed the importance of using various planning methods, such as zoning, public land acquisition, improved public transport, subdivision, and the servicing of additional development land, to achieve housing reform and enhance urban environments (Zimmermann, 2009). Consequently, building regulations, a distinct institution dating back to the Middle Ages, became linked to the idea of zoning (Kötter, 2018). These restrictions initially focused on well protection, fire and structural safety, and neighbour rights. At that time, zoning primarily focused on health and technical efficiency; however, its scope grew over time (Lainton, 2021). In addition to the earlier, more general concern about fire safety, planners began to regulate larger issues such as structural integrity and building design (Logan, 1976).

Although zoning gained recognition for its adaptability, sensitivity to local conditions, and innovative ideas, its regulations became increasingly complex as new developments emerged

(Chaney, 2022). As a result, there was a demand for simplification; by the late 19th century, zoning regulations were thorough, explicit, and consistent across the city (Zimmermann, 2009). There was a shift from relying on traditional norms for new developments to a more comprehensive, uniform approach across the entire town (Logan, 1976). Zoning ordinances in German cities often addressed issues such as building height, building lines, open spaces, architecture, pavements, street access, service delivery, structural strength, use separation, and light accessibility (Chaney, 2022).

Alongside these regulations, many governments drafted expansion plans that included block sizes and shapes, as well as street widths and layouts (Kötter, 2018). Ultimately, most German cities used lot coverage and building height restrictions as primary criteria for zone classification (Logan, 1976). In Germany, zoning focused more on form and typology than on real estate development efficiency, property values, social and racial segregation, and the separation of houses and workplaces, concerns that became prominent in the United States and are known as Euclidean zoning. The first zoning plan in Germany was adopted in 1862: the 'Hobrecht Plan', also called the 'Binding Land-Use Plan for Berlin's Environs' (Bentlin, 2023). Two zoning maps of Berlin (the capital of Germany) are shown in Figure 4.8. The first (1862) and most recent (2025) zoning maps of Berlin are shown on the left and right, respectively.

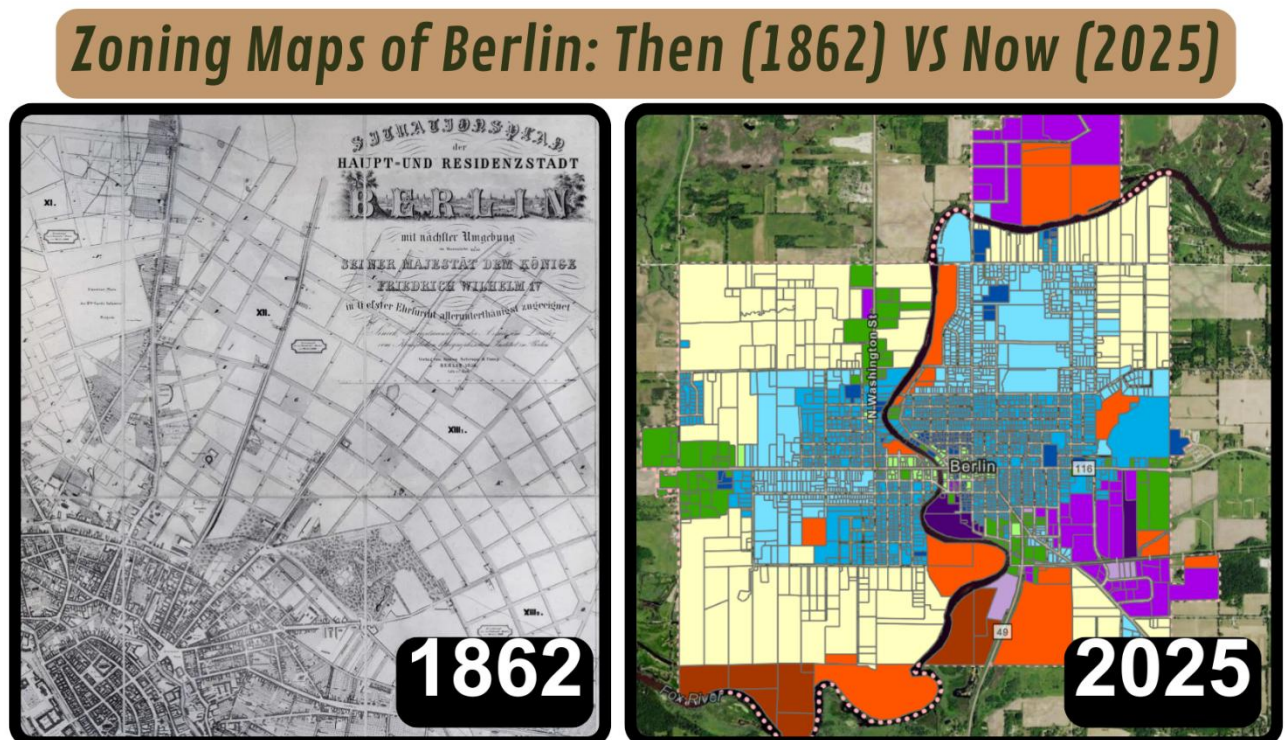


Figure 4.8: Zoning maps of Berlin in 1862 and 2025

Source: Lainton (2021) and Zoning Viewer (2025)

- **New York City Ordinance (1916)**

The first zoning regulations in the United States addressed specific issues, such as building heights in commercial districts (Fischler, 1998). The construction of new buildings in New York City reduced returns on earlier real estate investments because of their height (Lehavi, 2018). Initially, rents fell because tall buildings provided more leasable space than the market could utilise (Weiss, 1992). As a result, tenants from lower social classes could occupy spaces alongside those of higher classes (Chappell, 1990). The new buildings had adverse effects on their neighbours, such as (i) creating pronounced disparities in scale and style within the urban landscape, (ii) turning streets into dark "canyons," and (iii) forcing dependence on artificial ventilation and lighting (Chappell, 1990). The growth of undesirable uses has become a concern in both the residential and commercial sectors.

Some residents migrated due to instability and uncertainty, resulting in a decline in city income (Weiss, 1992). Overcrowding caused serious health problems, especially in apartment and office buildings with limited sunlight and airflow, which facilitated the spread of diseases (Lehavi, 2018). As tall textile factories overtook refined retail stores and commercial properties were overshadowed by larger skyscrapers, planners struggled to reduce congestion (Kantor, 1974). Concerned real estate and business owners urged decision-makers to find solutions to mitigate the damage caused by this uncontrolled growth. Sadly, this was just one aspect of two bigger problems: fluctuations in real estate values and urban congestion (Fischler, 1998).

Officials established a committee to address public concerns after recognising the issue of building height (Weiss, 1992). The committee had to decide whether dividing the city into zones or districts would be beneficial and whether the layout, size, and height of buildings should be restricted based on their location, character, and uses. Zoning was therefore a response to the need for improved residential areas and to reduce the significant damage caused by unregulated development (Bartholomew, 1932). On 25 July 1916, New York City enacted an ordinance regulating building sizes and land use. New York City's zoning system comprised three use zones: (i) residential, (ii) commercial, and (iii) industrial, with five height zones, each specifying a maximum height as a multiple of the street width, and five area districts with additional criteria for lot coverage and yard or court sizes (Chappell, 1990).

Authors such as Bassett (1936), Ford (1929), and Veiller (1914) laid the foundation for municipalities to regulate building design and land use. The primary aim of the zoning code was not to exclude undesirables but to rationalise the landscape (Ward & Zunz, 1992). However, as expected, racial conflict and class division played a significant role in the early development of zoning (Babcock, 1966). Due to its varied interpretations, zoning quickly became an integral part

of municipal legislation across North America (Scott, 1971). Municipal governments supported zoning because districting would enable them to streamline infrastructure planning (Revell, 1900). Like infrastructure planning, zoning aims to guide development in newly built areas and support long-term growth (Fischler, 1998).

According to Munro (1931), the idea of zoning originated with city officials rather than property owners. Nonetheless, Bassett (1936) believes that, although economic interests and real estate were key to the origin and development of zoning, public officials, professional reformers, and planning advocates all played leading roles in creating and promoting municipal regulations (Lehavi, 2018). The early supporters of zoning included developers and homeowners seeking to protect wealthier residential areas from lower-income uses and residents (Weiss *et al.*, 1992). However, some homeowners did not initially accept the zoning restrictions. While some welcomed the state's protection, others opposed its interference (Weiss, 1992). Therefore, zoning was intended to safeguard homeowners and their families from the morally harmful effects of congested cities and the physical inconveniences of high-density development (Bassett, 1936). As a result, planners view the 1916 ordinance as a city planning experiment rather than merely a regulatory measure because it addressed issues related to skyscraper and loft construction, suburban development, and social segregation (Fischler, 1998).

Additionally, the New York City code was the first comprehensive zoning ordinance, meaning it was the first to be implemented across the entire municipal area (Weiss, 1992). The 1916 ordinance is essential in planning history not only because it was the first city-wide ordinance of its kind but also because the social, political, and economic issues that continue to influence zoning and planning debates were discussed in New York City both before and after its adoption (Lehavi, 2018). The main concerns that persist include safeguarding residential areas, social group segregation, urban infrastructure management, and municipal financial control. However, it is essential to recognise that zoning can only help prevent future mistakes and cannot correct past ones. Two zoning maps of New York City are shown in Figure 4.9. The first (1916) and most recent (2025) zoning maps of New York City are shown on the left and right, respectively.

Zoning Maps of New York: Then (1916) VS Now (2025)

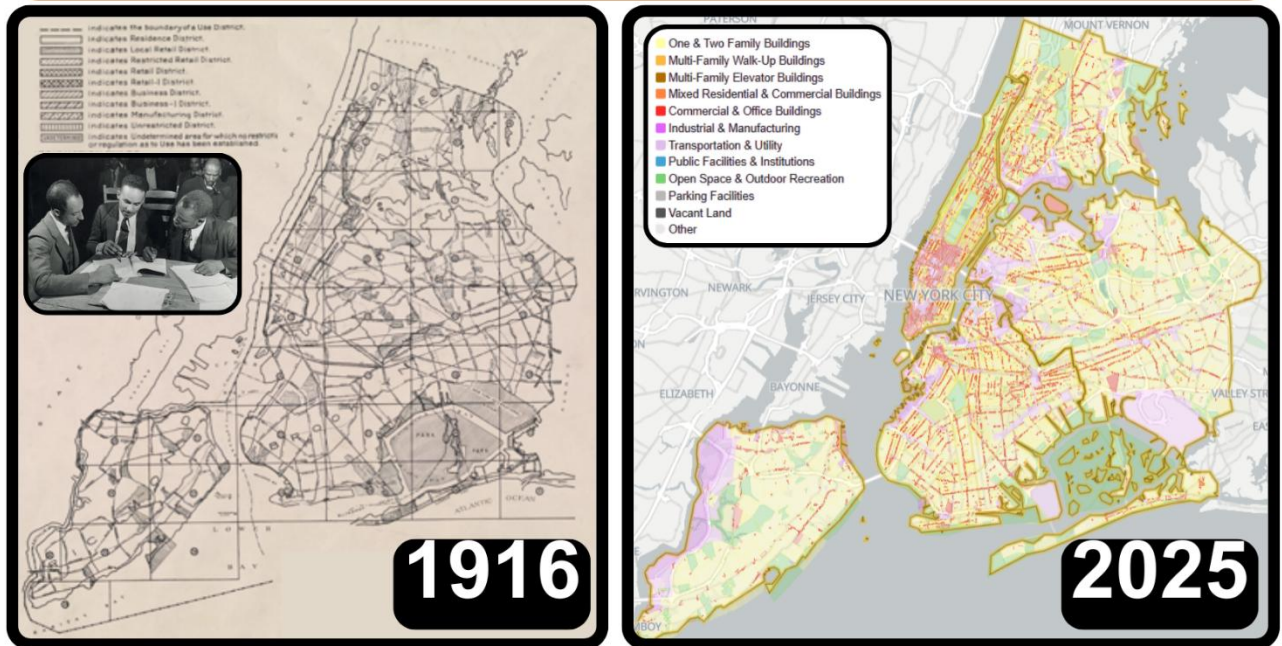


Figure 4.9: Zoning maps of New York City in 1916 and 2025

Source: New York Public Library (1916) and ZoLa (2025)

- **Comparison of Early Approaches**

According to Toll (1969), the 'zone system' was a crucial element of German planning and significantly influenced American planners seeking to adopt the concept. Consequently, American planners looked to Germany's zoning system as an example to support their case for implementation (Logan, 1976). Beyond zoning, American planners examined other planning techniques used in Germany (Weiss, 1992). Initially, both countries emphasised reducing residential density to improve living conditions. However, alongside residential density, the distribution of different land uses, including residential, commercial, and industrial, began to shape growth in the United States (Fischler, 1998).

While promoting the zoning instrument to the public, governments, and courts, both German and American planners simplified the analysis to focus solely on zoning (Logan, 1976). As a result, planners in both countries recognised that housing reform and urban growth could not be achieved solely through zoning, and little attention was paid to additional policy tools to help zoning achieve these more complex goals (Fischler, 1998). Furthermore, the scope of the task that needed to be addressed with this single tool was the main difference between German and American zoning regulations. Although the regulations in the two countries differed significantly,

they shared some aims and objectives, and despite their diverse origins, zoning had a substantial impact on both countries (Toll, 1969).

- **Differences between Early Approaches**

Land-use segregation was seen more as a matter of dominance than of exclusivity within a given area. It was believed to be so beneficial that it would naturally occur without being explicitly required (Toll, 1969). However, in Germany, land-use separation was not given much prominence because the subdivision plan was considered crucial for establishing the necessary level of separation, and zones for exclusive use were not intended (Baumeister, 1936). Therefore, service segregation and clean work environments were less prevalent in Germany than in the United States (Weiss, 1992).

The German planners believed this was managed under the subdivision plan, which had a much longer history in Germany than in the United States (Logan, 1976). In the United States, the strict separation of land uses, such as residential, commercial, and industrial, often resulted in 'dead' areas and strained the transportation system (Jacobs, 1961). Zoning regulations also sought to balance reducing residential density with the realities of business interests, many of which had already seen price increases due to expectations of high-density development (Weiss, 1992). A long-standing concern with zoning is its potential to promote socio-economic segregation. This was sometimes achieved by making controls more specific and differentiated than necessary for healthy housing density (Toll, 1969).

However, German ordinances were often vague and less focused on use restrictions; early zoning applications in the United States already recognised and reinforced social class disparities (Logan, 1976). These disparities were not part of German planners' reform intentions (Baumeister, 1936). Early United States zoning restrictions often aimed to exclude establishments serving undesirable social classes, thereby isolating those groups (Toll, 1969). This practice is related to American conferences' emphasis on maintaining consistent development regions to protect property values (Weiss, 1992). However, Davidoff *et al.* (1970) argue that encouraging economic class segregation has led to dysfunctional and uneven urban development patterns in the United States.

Socio-economic exclusion was also reinforced by the single-family zoning criteria, which are much more stringent than the health and safety requirements (Weiss, 1992). Additionally, early practices excluded hazardous industries from residential areas (Logan 1976). While the United States was more concerned with dangerous industries, German planners focused on building low-density housing on the edges of their cities (Baumeister, 1936). Other purposes for zoning in

the United States included stabilising property values, limiting skyscrapers, helping to design future urban services, lowering the risk of fire, ensuring light, air, and sanitation, avoiding traffic congestion, and separating businesses from residential areas (Jacobs, 1961). Figure 4.10 shows the differences between zoning in Germany and New York City.

Differences Between Zoning in Germany and the United States (NYC)

ASPECT	GERMANY	UNITED STATES
ORIGINS OF ZONING	Rooted in the reform era and driven by industrialisation and poor living conditions.	Initially driven by real estate interests and the need to control building heights and land use in a growing urban environment.
FOCUS OF ZONING	Focused on form and typology, while prioritising health, urban aesthetics and structural safety.	Primarily focused on land use segregation (residential, commercial, industrial) and reducing urban density
LAND USE SEGREGATION	Land uses were not rigidly segregated since zoning was often guided by subdivision plans.	Emphasised strict land use segregation, with residential, commercial, and industrial zones being highly distinct.
ROLE OF SOCIAL CLASS	Less emphasis on class segregation, with zoning addressing issues like health and safety.	Zoning sometimes explicitly reinforced class segregation by excluding lower-income areas from wealthier ones.
ZONING REGULATIONS	Zoning regulations were initially more general and focused on public health and safety, but gradually became more detailed.	Regulations were very detailed from the start, often focusing on property values and economic considerations.
ZONING ORDINANCE APPLICATION	Zoning applied more flexibly, with each city determining its own needs and regulations.	New York City's ordinance implemented a comprehensive city-wide zoning system, influencing the development of zoning throughout the United States.
URBAN DESIGN & AESTHETIC CONCERNS	Urban planners like Sitte and Baumeister were focused on aesthetics and urban structure.	While aesthetics were considered, the main concern was typically economic efficiency and functionality.
KEY HISTORICAL EXAMPLE	The Hobrecht Plan of 1862 in Berlin, emphasising urban form and public health.	New York City's 1916 zoning ordinance, which was the first comprehensive city-wide zoning system.
HEIGHT REGULATIONS	Regulations often addressed building height as part of broader urban design concerns.	Height regulations were part of the zoning code, especially due to the emergence of skyscrapers.
FOCUS ON HEALTH AND SAFETY	Early regulations were focused on health, safety, and structural soundness.	Early regulations also prioritised health and safety, but later became more about preserving property values and real estate interests.

Figure 4.10: Differences between Early Approaches

Source: Own construction, based on Logan (1976)

- **Similarities between Early Approaches**

However, the early regulations of the two countries had some similarities; for example, in both countries, specific hazardous industries were prohibited or restricted in residential areas (Logan, 1976). In early zoning applications in the United States and Germany, there was no clear distinction between residential and commercial properties; therefore, hazardous industries that could immediately harm people or the environment were the primary focus of use segregation (Jacobs, 1961). Even so, dividing industrial areas into multiple zones for different types of retail and light industrial uses deprives neighbourhoods of essential activity (Fischler, 1998). As a result, there is a risk of harmful social consequences from the zoning tool's elaborations, which are often inadequately researched (Weiss, 1992). Figure 4.11 shows the similarities between zoning in Germany and New York City.

<i>Similarities Between Zoning in Germany and the United States (NYC)</i>	
ASPECT	SIMILARITIES BETWEEN THE TWO COUNTRIES
INFLUENCE OF INDUSTRIALISATION	Zoning emerged in both countries as a result of rapid industrialisation, overcrowded housing, and poor living conditions.
HEALTH AND SAFETY CONCERNS	Regulations were created to address concerns like sanitation and fire safety, as well as to provide enough lighting and airflow.
SEGREGATION OF HAZARDOUS INDUSTRIES	Hazardous industries were restricted from residential areas in both countries to protect public health.
EARLY ZONING FOCUS	Initial zoning efforts focused on building density, land use, and improving living conditions, particularly in urban centers.
REGULATION OF BUILDING FORM	Zoning regulations governed building height, street access, and architectural form in both countries
MUNICIPAL ROLE IN PLANNING	Local governments played a significant role in zoning implementation and urban planning in both countries.
PROTECTION OF RESIDENTIAL AREAS	Zoning was used in both countries to protect residential areas from overcrowding and unsuitable land uses.
ZONING AS A RESPONSE TO OVERCROWDING	Both countries implemented zoning to address overcrowding and poor urban living conditions.
DEVELOPMENT OF COMPREHENSIVE PLANS	Comprehensive planning strategies were developed to guide urban growth and future development in both countries.

Figure 4.11: Similarities between Early Approaches

Source: Own construction, based on Logan (1976)

4.3.4 Effective Implementation

Statutory planning relies on the development of norms and standards that guide planning activities and form the foundation for regulatory systems (Lichfield & Prat, 1998). These standards include the authority to establish procedures for resolving conflicts and encouraging public participation, as well as to create and implement development plans (Ajhara & Bastian, 2023). For statutory planning to work effectively, a robust legislative framework is essential. Such frameworks improve administrative efficiency, consistency, and clarity by defining the roles of stakeholders, legitimising planning activities, and supporting the enforcement of planning laws (Pinson, 2007). A strong legal foundation promotes accountability and provides a systematic framework for spatial planning, enabling the effective formulation, implementation, and enforcement of policies (Ajhara & Bastian, 2023).

Meier and McFarlane (1995) emphasised the importance of integrated regulatory frameworks with clear objectives, defined responsibilities, and concrete implementation strategies. They argue that coherent legislation produces more favourable outcomes than fragmented and ambiguous laws. Statutory plans that articulate spatial visions and development objectives in detail (Lichfield & Prat, 1998) are typically supported by policy instruments addressing environmental protection, transport, and zoning (Pinson, 2007). As such, development plans and supporting policies are indispensable for guiding land-use decisions and ensuring alignment with strategic goals, such as sustainability and community well-being. Maidin (2012) contends that strategically channelled investments from both public and private entities facilitate orderly development, enabling the integration of land-use frameworks into broader government agendas. Development plans also establish mechanisms for growth management and empower local governments to enforce compliance (Tewdwr-Jones, 1994). Environmental regulations embedded within these frameworks further aim to mitigate adverse impacts and promote sustainable practices, reflecting a shift towards ecological responsibility in statutory planning (Johar, 2000).

According to Williams (2020), enforcement mechanisms are vital for maintaining the integrity of the planning system and ensuring compliance with planning requirements. Effective enforcement not only addresses unauthorised developments but also safeguards community interests and environmental quality. Millichap (1991) notes that the institutionalisation of enforcement mechanisms has greatly influenced planning processes, strengthening the system's legal framework. However, enforcement often encounters challenges, such as limited resources and lower prioritisation within planning departments (Sheppard *et al.*, 2014). As Carnwath (1989)

observes, poor understanding and awareness among enforcement agents can result in ineffective compliance.

The effectiveness of statutory planning also depends heavily on regulatory tools that shape the administrative systems local authorities use to achieve their objectives and policies (Ajhara & Bastian, 2023). While context influences their success, these tools are essential for managing urban growth and transportation networks. Instruments such as environmental impact assessments (EIAs), zoning ordinances, and land-use regulations ensure that developments conform to statutory guidelines (Williams, 2020; Ajhara & Bastian, 2023). Traditional tools like zoning and subdivision controls help preserve neighbourhood integrity and guide development, but they often fall short in revitalising urban centres (Faicp, 1999). Modern alternatives, such as performance-based regulations, focus on outcome-oriented compliance and employ incentives and persuasive measures rather than punitive actions (Windholz, 2022). Despite their potential, Faicp (1999) argues that regulatory tools have frequently failed to address issues in both central and peripheral areas, contributing to urban sprawl and environmental degradation. As Williams (2020) highlights, the success of these tools ultimately depends on institutional capacity to interpret market signals and the robustness of the regulatory framework.

Stakeholder participation, including that of individuals, communities, businesses, and government agencies, is a key element of statutory planning (Fruchtman, 1986). Participation mechanisms foster transparency, inclusivity, and accountability, although their success often depends on socio-economic conditions and the design of engagement tools. Public participation enhances democratic legitimacy and responsiveness by incorporating community concerns into planning decisions (Ajhara & Bastian, 2023). Stokes (2012) and Lemar (2021) contend that inclusive engagement yields more equitable planning outcomes, especially when marginalised communities are actively involved. Kgobe *et al.* (2023) observe that effective participation occurs when communities are empowered to express their needs meaningfully within planning procedures. Administrative systems ensure that public engagement goes beyond symbolic gestures and is genuinely integrated into planning processes (Stokes, 2012).

Fruchtman (1986) contends that participatory success depends on frameworks that balance stakeholder interests while limiting the undue influence of wealthy groups. Stakeholders, whether government officials, private-sector actors, or community members, bring diverse viewpoints that enhance policymaking (Eversole, 2018). Identifying key players and understanding their perspectives through detailed stakeholder analysis enhances the legitimacy of the planning process. Nevertheless, persistent power imbalances can restrict authentic participation and marginalise less influential voices (Fruchtman, 1986). Achieving consensus among stakeholders

with divergent interests is challenging yet essential for successful outcomes. Therefore, while stakeholder engagement is necessary, it must be underpinned by mechanisms for conflict resolution and power balancing to ensure fair results (Windholz, 2022).

In the broader context of land-use management, statutory frameworks seek to balance economic, social, and environmental priorities (Fruchtman, 1986). These frameworks employ policy instruments, such as fiscal incentives and environmental standards, to steer land-use decisions. Effective governance, characterised by collaboration across levels of government, is vital to prevent adverse outcomes such as environmental degradation and urban sprawl (Krawchenko & Tomaney, 2023). As Mitchell *et al.* (2004) note, statutory planning serves as a legal tool to direct land-use change and to encourage efficient allocation. Community engagement improves legitimacy and responsiveness, yet regulatory constraints and community opposition often constrain significant changes in land-use practices.

Although robust legal frameworks are in place, the implementation and enforcement of statutory planning often fall short at the local level (Windholz, 2022). This is mainly due to inadequate funding, poor institutional collaboration, and limited technical expertise (Fruchtman, 1986). To prevent conflicts over land use and uncontrolled urban sprawl, statutory planning must address complex challenges, including integrating local and scientific data, reconciling competing land-use needs, and ensuring policy consistency across sectors and levels of government (Metternicht, 2017).

4.3.5 Contemporary Trends

Conventional frameworks often lack the flexibility to respond to emerging challenges, such as technological progress or climate change (Harwood, 2011; Alden, 2006). This limits planners' capacity to adapt to changing urban conditions. Berke (2014) highlights the importance of adaptive planning systems that account for uncertainty and facilitate continuous monitoring. Once viewed as a flaw, flexibility is now regarded as a strength that boosts innovation and responsiveness in planning. However, excessive flexibility can weaken coherence and long-term consistency. Therefore, a balanced approach is essential to enable adaptability without compromising community trust or strategic aims (Williams, 2020).

Albrechts (2009) suggests that conventional statutory planning, often characterised as a physically focused, bureaucratic, and regulatory approach, fails to address complex challenges. Traditional planning primarily focuses on controlling and managing land-use change; it usually does not question or alter existing social institutions (Williams, 2020). Plans tend to be inflexible because they operate within a framework that assumes stability and predictability (Albrechts,

2015). The main aim of statutory planning has shifted to providing investors with legal certainty, often at the expense of flexibility in adapting to changing circumstances.

Apart from providing practical solutions to social or economic issues, most land-use plans tend to overlook genuine, historically rooted restrictions on human activity (Williams, 2020). Due to their broad scope and limited resources, they force politicians and planners to make quick decisions (Albrechts, 2015). As a result, plans often become unrealistic, quickly outdated, and lack sufficient knowledge or feasibility for implementation (Albrechts, 2015). Conventional statutory plans, which generally lack adequate data and fail to account for implementation resources or opportunities, can quickly become obsolete. When making decisions, they often rely on a technical rationale and prioritise professional expertise over political considerations (Albrechts *et al.*, 2019).

Zoning and regulation are the primary methods used in traditional statutory planning, which tends to be passive and localised (Williams, 2020). These approaches aim to ensure that high-quality developments occur where and when they are needed, even if this prevents undesirable ones. These plans often exclude stakeholder participation, are inflexible, and focus mainly on 'physical' aspects while neglecting actual human activity (Albrechts, 2004). Public involvement, though vital, also faces structural challenges. Power imbalances, digital divides, and a lack of participatory tools can limit meaningful engagement (Fruchtman, 1986; Ajhara & Bastian, 2023). E-participation initiatives, although promising, may exclude marginalised groups due to unequal access or technical barriers (Aitken, 2014). Participation is often superficial, with little real influence on decision-making (Stokes, 2012). Institutional resistance and fragmented governance can further reduce the effectiveness of involvement.

Finally, broader forces such as urbanisation, demographic change, and climate risk pose new challenges that statutory planning must address (Williams, 2020). Rapid urban growth puts pressure on infrastructure and worsens social inequalities. According to Ramasubramanian and Albrechts (2018), declining citizen trust and diminishing professional authority further undermine the legitimacy of planning processes. Inadequate inclusion of environmental assessments within statutory frameworks contributes to unsustainable urban development (Sperling, 1997).

4.3.6 Limitations and Challenges

Despite its fundamental importance, statutory planning faces numerous limitations and challenges. A significant challenge is balancing conflicting priorities, such as economic growth and environmental protection (Harwood, 2011). These tensions often lead to disputes among stakeholders, requiring careful mediation (Fruchtman, 1986). Regulatory frameworks must address moral and legal conflicts, competing interests, and administrative inefficiencies. For

example, Lee (2012) notes that reconciling private property rights with public environmental duties often complicates the implementation of statutes. Practical obstacles, such as jurisdictional uncertainties and limited procedural knowledge, further constrain planning effectiveness (Oeter, 2019). However, some scholars contend that these tensions could stimulate innovation, encouraging legal reforms and more adaptable planning approaches (Harwood, 2011).

Critics highlight further weaknesses in statutory frameworks, particularly in sustainability, ethics, and operational complexity. For instance, Barnes *et al.* (2011) note that many statutory frameworks do not effectively incorporate sustainability principles, particularly in rural service delivery. The focus on procedural compliance often neglects ethical considerations and long-term social well-being (Campbell & Marshall, 1999). Additionally, the growing complexity of planning systems reduces clarity and hampers effective governance (Roberts, 1998). Nonetheless, some contend that the fundamental features of statutory systems are worth maintaining and improving gradually rather than being entirely discarded.

As articulated by Metternicht (2017), the following principles of exemplary practice in statutory planning are essential for achieving sustainable land use management: (i) Effective land use management involves setting clear, well-defined objectives for conserving natural resources, combined with a strong emphasis on meticulous planning (Foroughi & Daneshgar, 2024). (ii) To ensure fair representation and effective communication during negotiations, statutory planning must acknowledge stakeholders' diverse objectives and promote collaborative, participatory strategies (Mitchell *et al.*, 2004). (iii) In planning, it is vital to consider land ownership systems alongside other sociopolitical and legal factors (Mitchell *et al.*, 2004). (iv) Enhancing territorial coherence requires effective statutory planning that applies across local, regional, and national levels (Aribigbola, 2008). (v) Balancing land utilisation with environmental concerns and resolving conflicts between sectoral interests necessitates statutory planning (Foroughi & Daneshgar, 2024). By integrating policies across sectors, such as water, energy, and land management, into a unified regional planning instrument, sustainable land use management can be significantly improved. (vi) Recognising that landscapes serve multiple functions and require a balance of various planning and management strategies, statutory planning should incorporate both land cover and land functionality perspectives (Fruchtman, 1986).

Prevailing planning paradigms often encourage car use and cause environmental harm, revealing a disconnect with sustainability objectives. Therefore, renewed emphasis is required on safety, risk management, and environmental stewardship. Nonetheless, these concerns also present opportunities to reconsider statutory planning as a means to resilience and inclusive urban development (Harwood, 2011).

4.4 Conclusion

Strategic planning is a proactive, action-oriented approach that addresses specific challenges through tools such as environmental analysis and SWOT analysis. Its goal is to develop lasting, sustainable strategies despite uncertainty, foster innovation, build consensus, and support implementation across different timeframes (Legacy *et al.*, 2014). Central to this approach are continuous observation, systematic adjustments, and active stakeholder engagement to ensure adaptability and effectiveness (Albrechts, 2001). Strategic planning is naturally dynamic and context sensitive. It considers local conditions alongside broader external trends and involves a wide range of stakeholders, including government bodies, the private sector, civil society, and academic institutions, in the collaborative development of strategies (Albrechts & Balducci, 2013). Rather than merely reacting to change, it promotes transformative action aimed at reshaping socio-spatial futures through collective visioning (Albrechts, 2009). Historical institutions and planning models, such as the Town and Country Planning Association and the New Towns initiative, highlight early examples of strategic planning and underscore the importance of preserving institutional knowledge and planning capabilities (Phelps & Valler, 2024).

Strategic planning promotes the utilisation of dispersed knowledge and innovation across sectors, thereby fostering consensus-building and adaptive capacity, especially in informal and transitional settings (Legacy *et al.*, 2014). The growing involvement of interest groups, particularly in environmental matters, has established strategic planning as a vital tool for tackling complex, multifaceted urban issues (Phelps & Valler, 2024). Sartorio (2005) describes strategic planning as a collaborative and participatory process that goes beyond traditional bureaucratic models. It offers the flexibility to respond to rapidly changing social demands, encourages innovation, and facilitates collaborative problem-solving. According to Mäntysalo *et al.* (2015), strategic planning requires a comprehensive, visionary approach. It should be action-oriented and planning-focused, equipped to manage ambiguity and reconcile certainties through relational co-production and legal integration. Consequently, many cities and regions now employ strategic planning alongside traditional statutory planning frameworks (Albrechts & Balducci, 2013).

In contrast, statutory planning provides a systematic, legally grounded framework for managing spatial development through regulatory tools, zoning policies, and enforcement measures. It plays a vital role in aligning development with public interests, promoting social equity, and protecting the environment (Legacy *et al.*, 2014). It is especially effective in maintaining procedural consistency, safeguarding property rights, and ensuring legal certainty in land use management. However, statutory planning is often criticised for its rigidity, limited adaptability, and difficulty in responding to complex and emerging urban issues. Issues such as inclusivity, fragmented

stakeholder participation, and the difficulty of balancing competing land use interests reduce its effectiveness. Phelps and Valler (2024) highlight the need to reform education and training in statutory planning, which has historically focused too heavily on administrative and regulatory roles at the expense of creativity, design thinking, and persuasive communication. Planners are now expected to develop interdisciplinary skills and use narrative approaches to effectively engage communities and tackle the multifaceted challenges of modern urban environments (Legacy *et al.*, 2014).

The fundamental tension between statutory and strategic planning stems from their philosophical orientations. Statutory planning is characterised by a 'hard', prescriptive, and outcome-driven approach aimed at establishing land values, safeguarding property rights, and ensuring zoning certainty (De Gregorio Hurtado & Andueza Lacarra, 2025). In contrast, strategic planning is described as 'soft', adaptive, and exploratory, with a focus on managing uncertainty and promoting flexibility (Mäntysalo *et al.*, 2015). Instead of viewing these approaches as mutually exclusive, strategic planning should serve as a complementary programming tool for statutory frameworks, continuously guiding and informing regulatory planning processes. Combining the two approaches can effectively balance flexibility with legal certainty. An integrated planning paradigm enhances legitimacy, responsiveness, and effectiveness in managing spatial development. Mäntysalo *et al.* (2015) argue that the 'both-and' dialectic offers a more comprehensive and integrated framework for modern spatial planning, capable of addressing complex challenges and fostering inclusive urban development. Figure 4.12 presents a summarised comparative analysis of strategic and statutory planning.



Figure 4.12: Comparative Analysis: Strategic vs Statutory Planning

Source: Own construction, based on Mäntysalo *et al.* (2015)

SECTION 3 EMPIRICAL INVESTIGATION

An empirical investigation, conducted as part of a research initiative, aims to test hypotheses and address research questions by systematically collecting and analysing real-world observational data. In this section, a distinction is drawn between developed and developing countries.

Developed countries are characterised by stable urbanisation, well-established infrastructure and services that support urban living. Planning practices are often comprehensive, emphasising public participation, environmental management, and sustainability. In these countries, effective urban planning and governance are supported by higher income and education levels (Waldeck *et al.*, 2020).

Developing countries are characterised by unpredictable urbanisation, leading to cities that grow faster than infrastructure can be built. This results in problems such as poor service delivery and housing shortages. Planning practices are often adapted from developed countries or inherited from colonial eras, often failing to meet local needs, leading to environmental damage and socio-economic inequality. In these countries, effective urban planning is hampered by social injustices and financial limitations, which exacerbate problems such as poverty (Waldeck *et al.*, 2020).

This section will examine the spatial planning perspectives of developed countries (Chapter 5), developing countries (Chapter 6), and South Africa (Chapter 7). Throughout this section, the following development indicators are utilised: Gross Domestic Product (GDP), the Gini coefficient (as a measure of inequality), and the Human Development Index (HDI). These indicators are employed to assess the developmental implications of spatial planning by capturing economic performance, income distribution, and broader human well-being. Collectively, they provide a nuanced and multidimensional perspective on how spatial planning frameworks shape development outcomes.

CHAPTER 5 SPATIAL PLANNING IN DEVELOPED COUNTRIES

5.1 Introduction

The theoretical insights drawn from the literature reviews in Chapters 3 and 4 will underpin the investigation of planning practices in developed countries. Specifically, in line with the primary objectives, this chapter seeks to: (i) analyse the impact of different practices on sustainability, equity, and urban and rural development; (ii) identify opportunities and best practices from case studies, with an emphasis on developed countries; and (iii) provide evidence-based

recommendations to improve the effectiveness of South Africa's spatial planning practices (see Section 1.3, Objective i, ii and iii).

This chapter examines the spatial planning frameworks of developed countries to deepen understanding of how spatial planning is applied across countries. Figure 5.1 presents a visual representation of the chapter's structural framework.

Chapter 5: Spatial Planning in Developed Countries

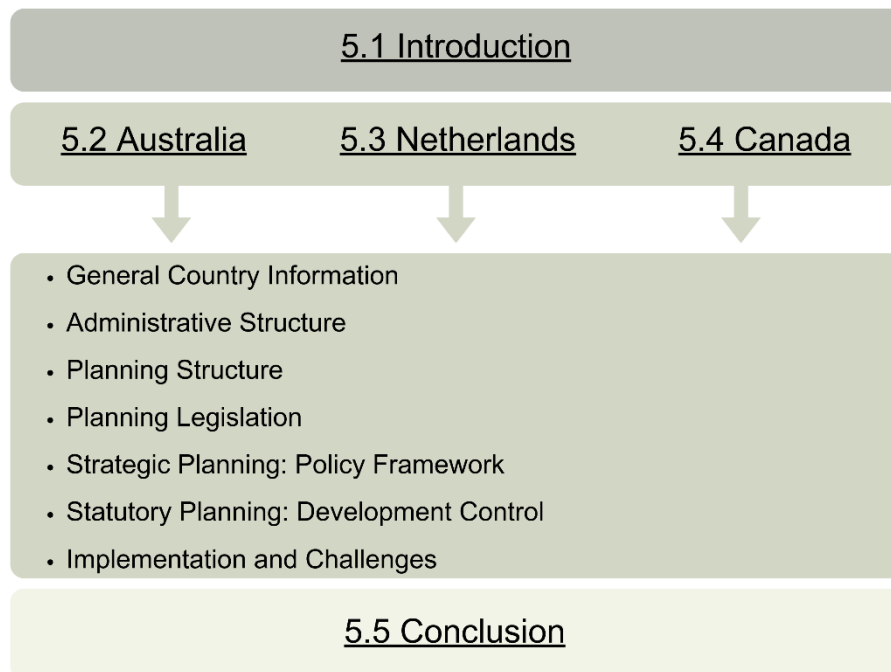


Figure 5.1: Structural Framework of Chapter 5

Source: Own construction

The following sections evaluate the spatial planning frameworks employed by the selected developed countries, specifically Australia, the Netherlands, and Canada, as indicated in Chapter 2 (see Case Study Design in Section 2.7), by focusing on each country's: (i) general country information, (ii) administrative frameworks for planning, (iii) legislative frameworks for planning (statutory planning), and (iv) approaches to addressing challenges in sustainability, spatial equity, and urban and rural development (strategic planning). Figure 5.2 illustrates the geographical locations of the three developed countries selected for this study.

DEVELOPED COUNTRIES



Figure 5.2: The Three Developed Countries Being Analysed

Source: Own construction

5.2 Australia

5.2.1 General Country Information

Australia, in the Southern Hemisphere, encompasses the mainland of Oceania, the island of Tasmania, and several smaller islands (Olivier, 2023). Recognised as both the smallest continent and the largest island, it spans 7,741,220 square kilometres, making it the largest country in Oceania and the sixth largest globally (Ghassemi & White, 2007). As the sole continental landmass, it comprises eight subnational entities: six states and two territories. Despite a population of 26,987,785, ranking 54th worldwide, Australia has a low population density of 3.5 persons per square kilometre (World Bank, 2023). Net immigration contributes to population growth, and the urbanisation rate of 86.6% is notably high (Australian Bureau of Statistics, 2024). Sydney is the most populous city, while Canberra serves as the political capital.

The climate varies significantly, encompassing tropical zones and arid deserts that support numerous indigenous species (Pincus & Hugo, 2012). Land use is varied, with 44% designated for pastoral leases; however, there has been a discernible shift towards tourism and conservation (Hughes & Schuele, 2003). Australia's Gross Domestic Product (GDP) stands at 1,752 trillion USD, ranking thirteenth worldwide. The economy is predominantly driven by the services sector at 63.57%, followed by industry at 27.65% and agriculture at 2.57%, with mining playing a vital role in exports. In 2022, 13% of Australians were vulnerable to poverty, with an inequality coefficient of 0.343. With an HDI of 0.958, Australia is considered a highly developed country (World Bank, 2023). Figure 5.3 presents a locality map and general country information for Australia.

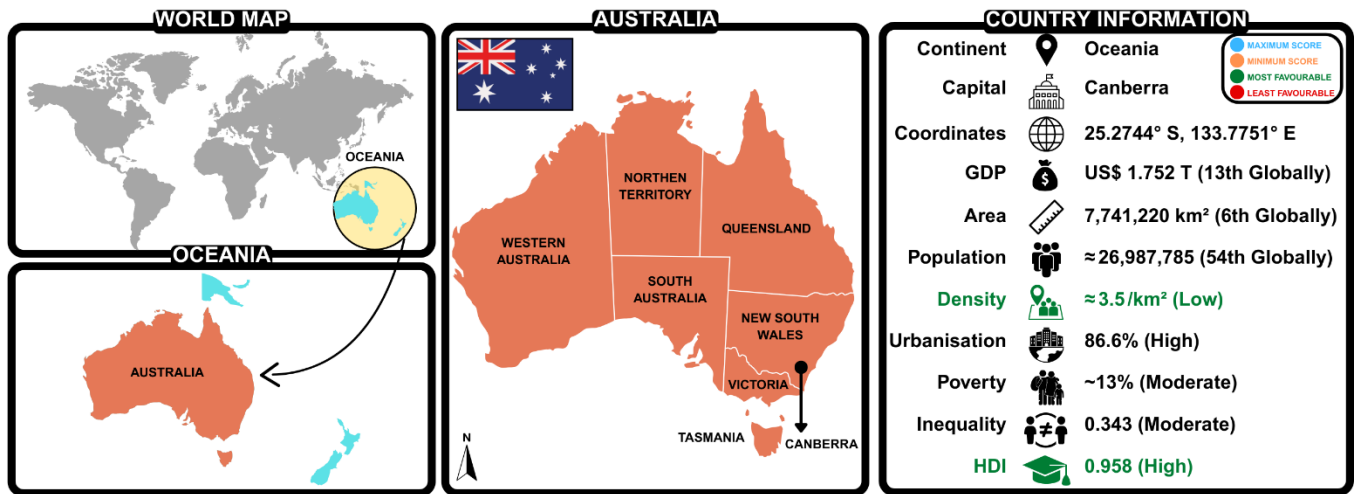


Figure 5.3: Locality Map and General Country Information of Australia

Source: Own construction, based on World Bank (2023)

5.2.2 Administrative Structure

Australia is governed at federal, state, and local levels within a constitutional monarchy, overseen by a federal parliament (Dryzek, 2020). The federal parliament comprises 227 members: 151 in the House of Representatives and 76 in the Senate. Federal elections are held every three years (van Onselen, 2004). The Governor-General, as the monarch's representative, is the head of state, while the Prime Minister leads the government. Municipalities without constitutional recognition are distributed across states and territories (Bateman & McDonald, 2017). The six states and two territories administer regions outside federal jurisdiction; however, the Australian Capital Territory functions as a city-state (Sansom & Tan, 2024). The states are responsible for health, education, and transport, whereas the federal government oversees trade, defence, and foreign relations.

The federal government manages public expenditure, while states and territories are responsible for service delivery and infrastructure (Ruming *et al.*, 2014). There are 537 municipalities governed by state and territory regulations, which receive federal support for services and development (Sansom & Tan, 2024). In certain regions, regional coordination entities operate instead of formal regional governments. The administrative framework relies on judicial review, ombudsmen, and tribunals for accountability, with an additional integrity branch required for comprehensive oversight (Groves, 2014). Governance is shaped by the division of authority between the federal and state levels, along with administrative law (Halligan, 2015). Figure 5.4 provides a visual representation of Australia's administrative structure.

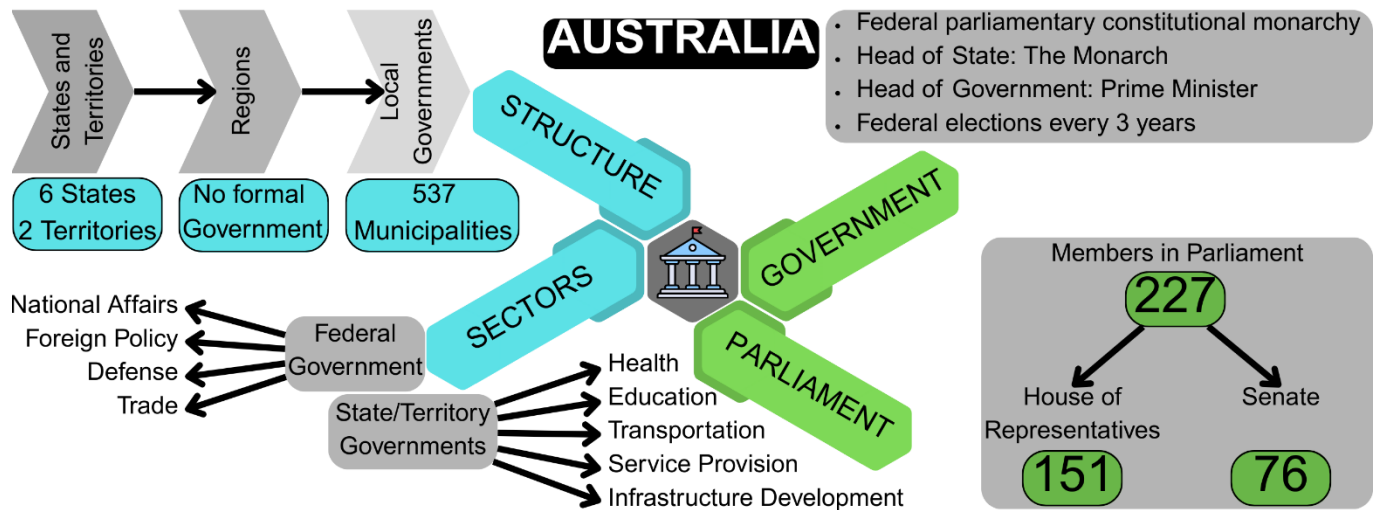


Figure 5.4: Administrative Structure of Australia

Source: Own construction, based on Bateman & McDonald (2017), Sansom & Tan (2024), and Halligan (2015)

5.2.3 Planning Structure

Given Australia's decentralised planning system, state and territory governments hold most of the authority to formulate planning legislation. This configuration creates a three-tier legislative hierarchy, in which each level of government maintains its specific role in the planning process (Ruming *et al.*, 2014). Consequently, in accordance with Section 51 of the *Constitution of the Commonwealth of Australia* (1900), the allocation of planning authority is as follows:

- (i) **Commonwealth Government:** In the absence of comprehensive planning legislation that explicitly regulates land-use decisions at the federal level, the Commonwealth Government's planning responsibilities are limited, as it has no direct constitutional authority over land-use planning decisions (Ruming *et al.*, 2014). Nevertheless, the *Environment Protection and Biodiversity Conservation Act* of 1999 (EPBC Act) serve as the primary national legislation that can influence land-use planning decisions (Padgett & Kriwoken, 2001).
- (ii) **State and Territory Government:** At this level of government, residual authority over land use planning is retained. However, this constitutional authority is accompanied by specific responsibilities (McMahon & Phillimore, 2013). The State and Territory Governments are therefore tasked with establishing planning tribunals, developing systems for assessing developments, integrating environmental considerations into planning decisions, formulating acts and policies for state, regional, and metropolitan planning, and serving as the primary authority for planning legislation (Ruming *et al.*, 2014).

- (iii) *Municipal Government*: Municipalities are subordinate to state governments and exercise delegated powers for execution (Kelly, 2022). The responsibilities of local authorities include strategic planning at the local level, engaging in community consultation, granting building development approvals and certifications, assessing and regulating development, and designing local planning schemes (Christensen, 2019).

5.2.4 Planning Legislation

Australia does not have a comprehensive national planning act (Ruming *et al.*, 2017). The Commonwealth Government increasingly influences planning decisions through the implementation of national policies and reforms (Camenzuli *et al.*, 2025). Consequently, each jurisdiction has established its own comprehensive set of planning acts to regulate land use, spatial development, and urban planning within its boundaries. The key planning acts established at the state level include:

- (i) *Environmental Planning and Assessment Act of 1979 for New South Wales*.

The *Environmental Planning and Assessment Act* of 1979 marked a significant step towards streamlining planning practices and promoting shared authority between state and local governments (Lipman & Stokes, 2008). As the first planning legislation in Australia to emphasise integrating social, economic, and environmental considerations within the planning framework, it holds significant historical importance (McFarland, 2011). This legislative initiative facilitated the development of comprehensive mechanisms for evaluating development proposals. However, recent amendments, notably the *Environmental Planning and Assessment Amendment Act* of 2008, have shifted decision-making from a less participatory process to a more technocratic approach (Jessup, 2014). This transition has reduced community engagement and increased centralised planning practices, consequently diminishing the influence of local municipalities (Lipman & Stokes, 2008). Additionally, the state explicitly addresses specific environmental concerns through its State Environmental Planning Policies (SEPPs) (McFarland, 2011).

- (ii) *Planning and Environment Act of 1987 for Victoria*.

The *Planning and Environment Act* of 1987 superseded Victoria's outdated planning legislation, the *Town and Country Planning Act* of 1944, thereby modernising Victoria's planning system (Buxton *et al.*, 2003). During the 1990s, substantial amendments to the legislation were enacted, and the Victoria Planning Provisions (VPP) were introduced to promote the standardisation of planning schemes throughout the state (Eccles, 1999). The main aim was to create a planning system that attracts investment and supports economic development; however, this may have

unintentionally reduced community participation in planning decision-making processes (Dore, 2001). Operating within a hierarchical policy framework, the act is meticulously organised to support the implementation of plans at both the state and local levels. Planning decisions under this legislation are reviewed through a merit-based evaluation mechanism with judicial review. Additionally, the act underscores the importance of comprehensively integrating environmental considerations into planning decisions. For example, the designation of Melbourne's non-urban areas and green belts exemplifies the act's emphasis on environmental protection amid urban development (Buxton & Goodman, 2003). In Victoria, hierarchical development guidance is provided through the State Planning Policy Framework (SPPF).

(iii) *Land Use Planning and Approvals Act of 1993 for Tasmania.*

This legislation operates within an integrated framework that consolidates development and planning approval procedures (Clark, 1999). Nonetheless, integrating the *Land Use Planning and Approvals Act* of 1993 with local planning initiatives failed (Hamilton, 2018). Consequently, this led to complexities and inefficiencies within Tasmania's planning system (Hamilton, 2018). The act's effectiveness was further compromised by its challenging objectives and the absence of formal regional planning mechanisms (Clark, 1999). As a result, the management of environmental issues related to development was limited (Clark, 1999). Nonetheless, the act considers public participation essential to planning decisions to ensure improved environmental outcomes (Figg, 2014). Furthermore, future reforms may aim to enhance the integration of the act with other legislation to strengthen its potential for sustainable planning (Figg, 2014).

(iv) *Planning Act of 1999 for the Northern Territory.*

This legislation has been amended to accommodate the varying conditions within this territory; therefore, it has evolved from protectionist to market-oriented approaches (Perche, 2016). It emphasises regional development through strategic planning for both localised and remote areas. Yet the focus on economic growth has resulted in simplified planning regulations and reduced bureaucracy (Ruming *et al.*, 2017). The alignment of this act with development-promoting efforts often overlooks the uniqueness of local social conditions, particularly those of indigenous communities (Bolleter, 2018). The acknowledgement of indigenous land rights differentiates this planning act from others (Sheehan, 2016). However, inadequate inclusion of indigenous communities in land-use decisions remains evident, despite the aim to acknowledge their rights (Wensing, 2023). Additionally, due to the lack of involvement and consultation with indigenous populations, their trust in institutions has been reduced, and a disconnect with other Australians has increased, leading to marginalisation and inequality (Breda, 2023). The *Planning Act* of 1999 conflicts with the *Aboriginal Land Rights Act* of 1976, since the planning act promotes

development and the land rights act promotes economic equality and social justice for indigenous communities. In conclusion, this act assesses the efficacy of development by implementing streamlined assessment methods.

(v) *Planning and Development Act of 2005 for Western Australia.*

The *Planning and Development Act* of 2005 consolidated three statutes: the *Western Australian Planning Commission Act* of 1965, the *Metropolitan Region Town Planning Scheme Act* of 1959, and the *Town Planning and Development Act* of 1928. To facilitate the streamlining and decentralisation of development applications, the act established development evaluation panels to serve as expert-driven decision-making entities, thereby aiming to reduce political influence on planning determinations (Maginn & Foley, 2014). Moreover, it emphasises regional growth and highlights the importance of assessment through a performance-based evaluation system. Although intended to promote sustainable development, the legislation lacks the mechanisms to fully embed sustainable practices into planning processes (Raphael, 2011). Therefore, a more effective approach, namely collaborative sustainability assessments, has been suggested to promote inclusiveness (Raphael, 2011). This legislation is supported by a strategic planning framework designed to promote sustainable, long-term development. Therefore, Western Australia endorses both sectoral and regional planning initiatives through its State Planning Policies. Overall, the key feature of this legislation is its integration of land-use planning with infrastructure development (Maginn & Foley, 2014).

(vi) *Planning and Development Act of 2007 for the Australian Capital Territory.*

The Capital Territory adopts a hybrid governance framework that integrates the roles of state and local government authorities. Nonetheless, this framework requires efficient coordination between the state authority and the federal government (Halligan, 2015). The *Planning and Development Act* of 2007 promotes an outcome-oriented approach to foster innovative and adaptable development solutions (Monnox, 2023). This legislation aims to alleviate regulatory burdens and streamline planning regulations, aligning with broader national planning reforms (Ruming *et al.*, 2017). The Capital Territory endeavours to reduce its carbon footprint and advance public transport initiatives. Consequently, it supports projects such as green precincts and light rail infrastructure (Norman & Sinclair, 2014). Furthermore, the legislation advocates inter-regional collaboration to optimise resource utilisation (Norman & Steffen, 2014). It emphasises principles of urban design and sustainability by regulating architectural and urban planning elements, thereby emphasising sustainable development. Furthermore, to facilitate effective community engagement, the legislation mandates comprehensive consultations with residents on planning matters (Monnox, 2023). For instance, residents of Canberra advocate for increased high-density

development to augment housing availability and mitigate urban sprawl (Monnox, 2023). Additionally, the Territory Plan serves as a comprehensive framework for directing development activities within the territory.

(vii) *Planning Act of 2016 for Queensland.*

Within a contemporary framework, this act was revised by integrating previous legislation to ensure it remains relevant to current planning contexts, specifically the *Sustainable Planning Act* of 2009 and the *Integrated Planning Act* of 1997 (Burton *et al.*, 2020). Aiming to uphold social and economic standards while fostering growth, this act seeks to streamline and simplify planning procedures. In rapidly developing regions such as Southeast Queensland, a coordinated planning approach is essential. Therefore, this act aims to unify state and local government efforts to achieve effective economic growth outcomes (Bajracharya & Hastings, 2018). Achieving effective, consistent land-use management across Queensland requires enhanced state oversight and intervention. Additionally, collaboration between the state and local governments ensures regional growth and that infrastructure needs are effectively addressed and aligned. The act also promotes urban resilience by encouraging the use of open data and community engagement (Burton *et al.*, 2020). Furthermore, Queensland oversees state-level planning through the State Planning Policy (SPP).

(viii) *Planning, Development and Infrastructure Act of 2016 for South Australia.*

This legislation repeals the *Development Act* of 1993, signalling a transition towards more efficient and integrated planning practices. It is part of a broader initiative to modernise legislation to better address current and future development needs (Leadbeter, 2021). A streamlined development process reduces costs and facilitates infrastructure expansion (Munyasya & Chileshe, 2018). The legislation incorporates a digital platform that renders the planning system entirely digital, commonly referred to as ePlanning. To evaluate the effectiveness of planning outcomes, it employs a streamlined assessment procedure that emphasises performance-based and code-based evaluations (Hawkins, 2025). The state has established planning policies grounded in a comprehensive state policy framework to guide development in accordance with this legislation (Leadbeter, 2021). Furthermore, South Australia has implemented a digital planning framework through the Planning and Design Code.

5.2.5 Spatial Planning

- **Strategic Planning: Policy Framework**

Australia's policy framework is a complex, multi-layered system designed to achieve diverse strategic objectives. It is influenced by a range of national, state, and local policies that emphasise sustainability, liveability, and urban development. The harmonisation of these policies is essential for managing urban growth and securing long-term development across the country. Consequently, the primary components of Australia's policy framework include:

(i) *National Urban Policy* of 2011.

This policy targets 18 major cities with populations exceeding 100,000 to enhance their productivity, liveability, and sustainability within urban environments (Stace, 2020). The implementation of this policy led to the creation of the State of Australian Cities reports, which serve as an annual platform for reporting on urban development, related challenges, and the sharing of insights and data (Stace, 2020). Furthermore, the policy emphasises prioritising sustainable development in urban areas (Davidson & Arman, 2014). However, the policy's effectiveness depends on political stability and ongoing support, making it vulnerable to changes in government priorities. Conflicts have arisen over the policy's centralised nature, especially regarding the need to grant local authorities greater decision-making power (Spiller, 2022).

(ii) *National Urban Policy Framework: "Our Cities, Our Future"* of 2011.

This strategic initiative was designed to address challenges associated with urbanisation in Australia while promoting sustainable development. The framework focuses on creating resilient cities and advocates the use of renewable energy in transport systems (Glazebrook & Newman, 2018). Given that urban environments often change in response to shifting conditions, the framework emphasises the need for cities to be well prepared and to strengthen their urban resilience policies (Griffiths & Synnott, 2011). Furthermore, the increasing use of renewable energy in transport systems encourages the decarbonisation of transport. The aim is to create polycentric cities connected by electric rail networks, with intra-city transport relying on bicycles and electric vehicles. As a result, dependence on transport methods that worsen climate change will decrease, supporting global warming mitigation efforts aimed at lowering temperatures to 1.5 °C (Glazebrook & Newman, 2018). Additionally, the policy seeks to strengthen urban governance and improve its capacity to handle issues such as social cohesion and inclusion. The framework thus promotes a national urban governance agenda to optimise resource distribution (Dodson, 2013). Furthermore, systematic upgrading of urban infrastructure to improve quality of life and promote sustainable growth is considered vital (Dodson, 2013). An additional goal is to create

more compact cities and encourage high-density development, while also regenerating grey field and brownfield sites to protect undeveloped environmental areas from development (Kinyanjui, 2020).

(iii) *Smart Cities Plan of 2016.*

The plan aims to develop 30-minute cities, where all services are accessible within a thirty-minute journey from an individual's residence. To reduce travel times, suburban areas should be densified as a strategic planning approach (Legacy *et al.*, 2016). Integrating transport, technology, and energy is expected to foster innovative urban environments that are economically attractive and resilient to change, thereby boosting urban efficiency and sustainability (Samól, 2017). The *Smart Cities Plan* of 2016 specifically emphasises Sustainable Development Goals 11 and 17, which focus on sustainable communities and partnerships; as a result, Australia's smart initiatives are designed to contribute to global sustainable development efforts. The plan provides a framework to strengthen local governments' capacity to implement innovative city initiatives. Through performance evaluation, areas needing improvement can be identified to achieve the objectives of a smart city (Yigitcanlar *et al.*, 2020). Therefore, transforming cities into smart cities can tackle issues such as resource management, congestion, and rapid urbanisation, while reducing the negative environmental impacts of urban development (Tariq *et al.*, 2020).

(iv) *National Climate Resilience and Adaptation Strategy of 2021.*

The strategy aims to build infrastructure that is resilient to climate change and able to withstand natural disasters. Therefore, there is a need for enhanced building regulations to ensure that construction can withstand potential hazards. The strategy aims to strengthen Australia's disaster management systems by implementing early warning systems and emergency response plans (Behrens *et al.*, 2024). This will improve readiness for natural disasters caused by climate change and enable quick action to reduce negative impacts on urban areas' infrastructure. Therefore, disaster risk management and urban planning should be combined to prioritise climate change adaptation. However, it also requires that local governments receive funding to enhance urban resilience systems (Behrens *et al.*, 2024). The strategy also seeks to lessen environmental and social vulnerabilities in urban areas. Focusing specifically on coastal regions, the plan aims to safeguard the most vulnerable habitats against climate change by implementing measures to adapt to evolving circumstances. There is a need to integrate climate adaptation considerations into land use planning practices (Behrens *et al.*, 2024).

(v) *National Housing and Homelessness Plan of 2023.*

The primary objective of this initiative is to provide suitable accommodation for the entire population. Consequently, the plan requires an annual review and update to ensure its goals are achieved. The *Australian White Paper on homelessness* of 2008 aimed to reduce homelessness by at least 50% by 2020 (Hartley, 2009). However, these targets were not achieved, leading to the development of the *Housing and Homelessness Plan* of 2023. It was recognised that a significant factor contributing to homelessness is the unaffordability of housing in Australia, combined with a shortage of affordable housing, which may be due to institutional capacity limitations. Therefore, government bodies need to work together to form long-term agreements on housing provision (Martin *et al.*, 2023). Emphasis is placed on marginalised and vulnerable groups to ensure they receive adequate support to prevent homelessness. Agencies such as Housing Australia are responsible for ensuring that this plan effectively achieves its goals of reducing homelessness (Martin *et al.*, 2023).

- **Statutory Planning: Development Control**

Australia employs a range of development control mechanisms to regulate urban expansion, safeguard fragile ecosystems, and promote sustainable growth. These mechanisms, encompassing both regulatory and incentive-based strategies, are implemented at various levels of government. Their effectiveness varies, often necessitating further legislative amendments or supplementary measures to achieve the intended objectives. Australia primarily utilises the following mechanisms for development control:

- (i) *Local Planning Schemes.*

Municipalities establish local planning schemes to regulate development, thereby fulfilling their responsibilities as local government authorities. Planning schemes are vital for controlling development within their jurisdictions and addressing local concerns. These schemes set out detailed development controls and zoning regulations to tailor development to each municipality's specific needs (Gilbert & Gurrán, 2018). Essentially, they act as a framework guiding the location and manner of development in Australian cities. To improve resilience to climate change, these schemes must include environmental planning considerations (Kelly, 2009). Specific state planning policy standards guide local planning schemes to ensure standardised planning across the entire state. Nonetheless, local planning policies allow schemes to be tailored to reflect local conditions. Consequently, local planning schemes align with overarching policy objectives (Shaw, 2003). Local governments have a vital role in developing and executing these schemes, and their input can either support or hinder urban development (Engels, 2018).

- (ii) *Metropolitan Region Schemes.*

These schemes are specifically designed to guide development within metropolitan areas. They enable the systematic enforcement of planning practices, ensuring that urban growth is consistent with regional objectives (Abbott, 2012). In Melbourne, the first metropolitan scheme was introduced in 1954 to address urban development issues such as transport congestion and employment distribution (Freestone *et al.*, 2016). The 1954 scheme laid the foundation for future metropolitan planning efforts. However, Australia lacks sufficient metropolitan governance structures, possibly because planning authority is concentrated at the state level (Burton, 2017). Furthermore, significant metropolitan regions such as Adelaide, Melbourne, and Sydney are experiencing rapid population growth and urban sprawl, conditions less prevalent in smaller cities, thereby rendering metropolitan schemes indispensable (Hamnett & Kellett, 2007).

(iii) *Development Control Plans.*

These plans guide development and land use within specific urban regions. Some municipalities have integrated transport planning mechanisms into their development control plans, primarily because evidence indicates that development control plans often fall short of fulfilling transport planning objectives (Wynne, 2015). Sydney demonstrates an exemplary use of development control plans to preserve historically significant developments, exemplified by its Heritage Development Control Plan. In the state of Victoria, the significance of development control plans in protecting water resources is emphasised, as evidenced by the establishment of water boards and referral authorities within these plans to safeguard potable water supply catchment areas (Hurlimann, 2008). Furthermore, development control plans can help regulate unplanned development in environmentally sensitive regions (Matthews, 2013). Nonetheless, at times, development control plans may not fully integrate sustainable development objectives (Gurran *et al.*, 2015).

(iv) *Zoning Regulation Plans.*

Zoning plans aim to guide development and manage land use in ways that align with broader strategic objectives. In Australia, sustainability goals are frequently integrated into zoning plans, such as the creation of conservation zones or the strategic guidance of urban form towards sustainability (Gurran *et al.*, 2015). Urban regions experiencing rapid growth tend to update their zoning plans more frequently to respond to development pressures (Gurran *et al.*, 2015). Additionally, zoning plans influence the housing industry and may constrain housing production (Gurran *et al.*, 2013). When advocating for diverse housing initiatives, zoning can be structured to promote higher-density development and minimise competition from higher-value land uses, thereby helping mitigate the housing crisis (Gilbert *et al.*, 2020). Nonetheless, zoning plans

frequently fall short of supporting such diverse housing projects and are often characterised by inflexible land use controls and inadequate definitions of land use zones (Gilbert *et al.*, 2020).

Figure 5.5 shows the planning framework for Australia.

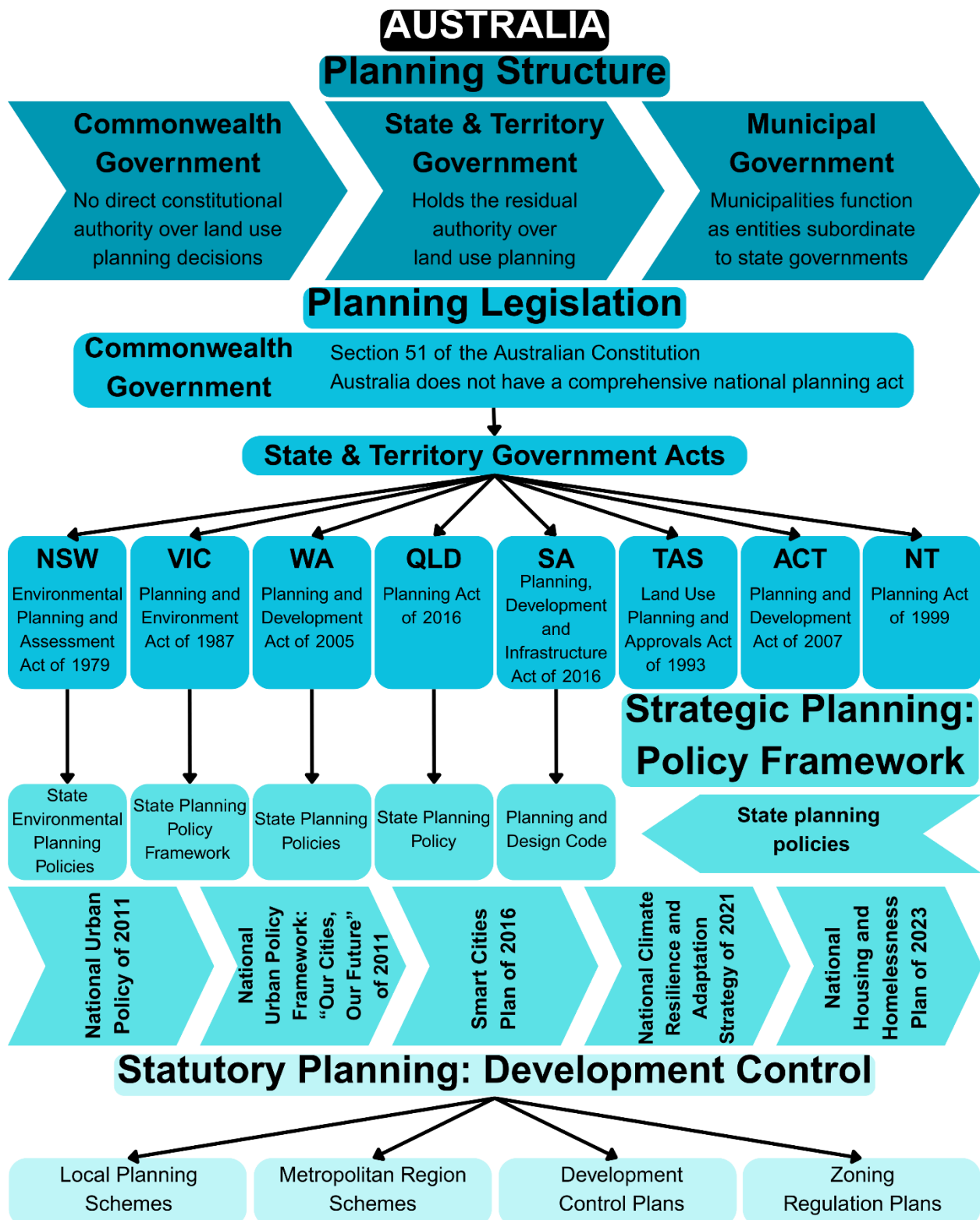


Figure 5.5: Planning Framework of Australia

Source: Own construction, based on the *Constitution of the Commonwealth of Australia* (1900)

5.2.6 Implementation and Challenges

In the absence of comprehensive national planning legislation, urban planning initiatives across Australia are markedly heterogeneous at both state and local levels. This fragmentation leads to inconsistent practices and disparities in urban development nationwide (Steele, 2024). Planning authorities are predominantly located within state and territory governments, which frequently results in a lack of coordination across government levels (Burton, 2017). Furthermore, the successful implementation of innovative strategic plans is often impeded by insufficient statutory frameworks essential for their execution (Goodman *et al.*, 2013).

In regions such as Sydney, economic disparities are often exacerbated by the selective application of planning policies, leaving underprivileged communities with significantly lower urban development quality (Uddin & Piracha, 2020). Furthermore, some may attribute Australia's housing shortage and construction delays to urban planning; however, this perspective may be biased (Gurran & Phibbs, 2013). The current governance and policy frameworks impede the effective integration of environmental considerations into planning practices, despite their necessity (Sipe & Vella, 2017).

Rapid urban transformation and global integration pose significant challenges for cities such as Sydney, as they can exceed metropolitan planning capacities and yield inferior urban development outcomes (McGuirk & O'Neill, 2002). Additionally, there is a discernible shift in decision-making practices in Australia towards the establishment of 'planning panels' to expedite planning procedures. Nonetheless, this transition may compromise the accountability and transparency of planning decisions (Williams, 2014). Consequently, reforms focused on efficiency frequently constrain the influence of comprehensive strategic plans, potentially undermining their effectiveness in advancing environmental sustainability and social inclusion (Goodman *et al.*, 2013).

5.3 Netherlands

5.3.1 General Country Information

The Netherlands, located in Western Europe, is an integral part of the Kingdom of the Netherlands and includes territories in the Caribbean (Wouters, 2007). It borders the North Sea, Belgium, and Germany, and is subdivided into 12 provinces. With a population of 18,346,819 and a total land area of 41,543 square kilometres, it ranks as the 134th most populous nation and the 67th largest

by land area globally (World Bank, 2023). The country is recognised as one of the most densely populated regions, with a population density of 430 inhabitants per square kilometre (Huitema & Kuks, 2004). It features a predominantly flat terrain, with substantial areas below sea level. Amsterdam is the capital and most populous city.

The country faces competing demands for land use, including agriculture, ecological conservation, and urban development, with agriculture occupying approximately 50% of the land (Wouters, 2007). The urbanisation rate in the Netherlands is high, reaching 93%. The poverty rate is 3.1%, and the inequality coefficient is 0.257; both metrics are the lowest among the examined case studies (World Bank, 2023). The Gross Domestic Product (GDP) of the Netherlands is estimated at \$1.215 trillion, ranking it 17th-largest worldwide, with the services sector accounting for 69.3% of its economy (World Bank, 2023). The country boasts a high Human Development Index (HDI) of 0.946, placing it among the world's highly developed countries. Figure 5.6 presents a locality map and general country information of the Netherlands.

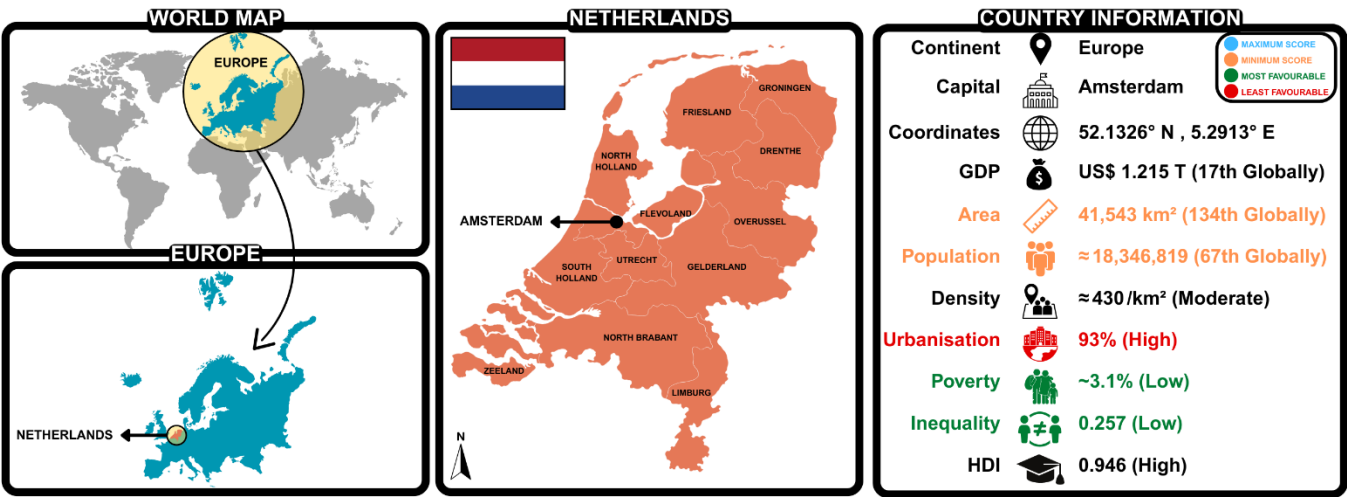


Figure 5.6: Locality Map and General Country Information of the Netherlands

Source: Own construction, based on World Bank (2023)

5.3.2 Administrative Structure

The States General of the Netherlands comprises the House of Representatives, with 150 members, and the Senate, with 75 members. King Willem-Alexander is the head of state, while the Prime Minister is the head of government, appointed following coalition negotiations (Louwerse & Vonno, 2025). The governance structure comprises the central government, provinces, and municipalities and has evolved continuously since the constitutional reform of 1848 (Woldendorp, 2014). The central government is responsible for creating national legislation

and policies, ensuring compliance, and supervising public expenditure, while provinces and municipalities receive local funding (Raijmakers, 2014).

Every four years, a Provincial Council is elected in each of the twelve provinces. The Provincial Executive manages regional affairs, including welfare, economics, and environmental regulation, with a King's Commissioner representing the Crown (Raijmakers, 2014). Approximately 342 municipal entities are responsible for local challenges, services, and policies in accordance with national legislation (Coenen, 2010). Municipalities deliver services such as planning, social support, and infrastructure, which are vital to policy implementation (Hoppe *et al.*, 2011). The decentralised system enhances responsiveness but can make coordination across levels more complex, as it requires balancing local autonomy with central oversight. Figure 5.7 provides a visual representation of the Netherlands' administrative structure.

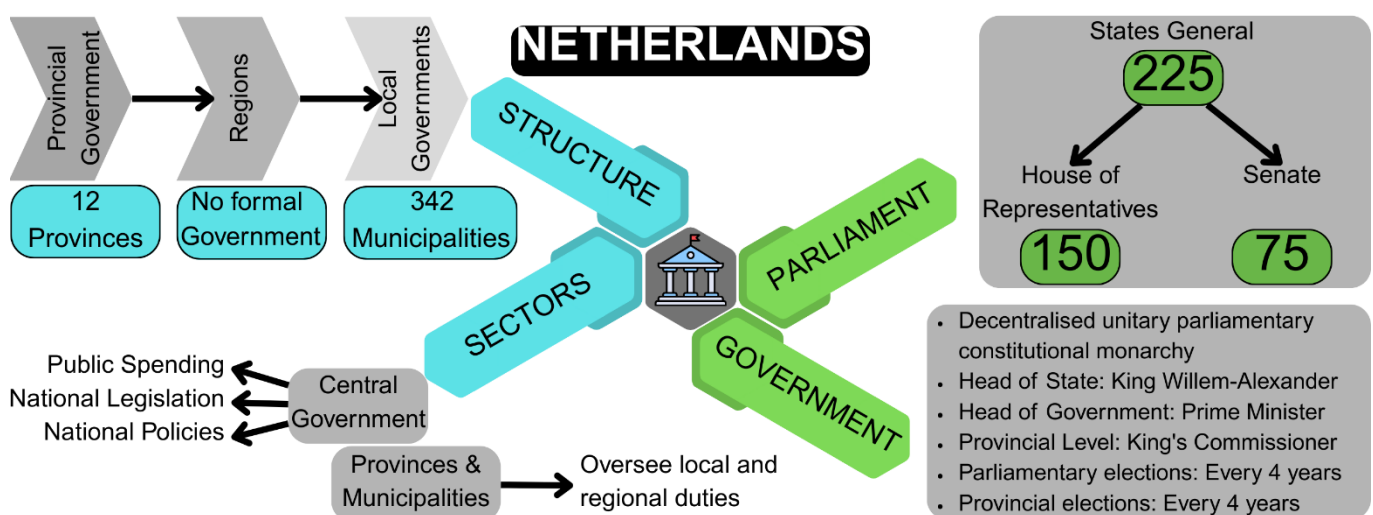


Figure 5.7: Administrative Structure of the Netherlands

Source: Own construction, based on Raijmakers (2014) and Coenen (2010)

5.3.3 Planning Structure

The Netherlands' planning framework is supported by a multi-level governance structure, in which each tier has specific responsibilities and authority for environmental management and spatial planning (Blankvoort, 2025). When broader interests are involved, higher authorities may intervene; however, this layered approach ensures that environmental and planning matters are addressed at the most appropriate level of governance. Therefore, planning responsibilities are assigned as follows:

- (i) *National Government:* When local or provincial administrations are unable to address national interests effectively, the national government assumes their responsibilities,

including authority over municipal and non-provincial jurisdictions (Abate, 2022). The national government, through the *National Environmental Vision* ('*Nationale Omgevingsvisie*') of 2020, provides strategic direction for spatial planning and environmental protection (Alishina, 2023). It can intervene in projects of national significance and ensure policy consistency across sectors and governance levels (Gies *et al.*, 2023). National planning frameworks set objectives for housing, infrastructure development, climate adaptation, flood management, and environmental protection, with staged goals for 2025, 2030, and 2035 (van Eldik & van Dam, 2024). In addition, the national government is responsible for maintaining endangered species lists, preserving Natura 2000 sites, and managing invasive species (Blankvoort, 2025).

- (ii) *Provincial Government*: Where local administrative entities fail to address provincial interests adequately, provincial authorities are authorised to assume their responsibilities (Priemus, 2004). This authority encompasses obligations under international law. Each provincial council has the duty to develop a *Provincial Environmental Vision* ('*Provinciale Omgevingsvisie*') and a *Provincial Environmental Plan* ('*Provinciale Omgevingsplan*'). Provincial governments are responsible for supervising municipal planning, coordinating issues across jurisdictions, and managing inter-municipal development, infrastructure planning, and resource distribution (Coenen, 2010). They also issue environmental permits for regional projects and oversee the quality of municipal environmental plans. Their responsibilities include preventing the introduction of invasive species, supervising Natura 2000 sites, and managing national nature conservation areas (Balz, 2019).
- (iii) *Municipal Government*: Municipalities generally assume responsibilities and exercise authority as set out in the *Environmental and Planning Act* of 2024. They are required to develop a *Municipal Environmental Vision* ('*Gemeentelijke Omgevingsvisie*') and a *Municipal Environmental Plan* ('*Gemeentelijke Omgevingsplan*') for their area. The Municipal Environmental Vision serves as a strategic spatial framework, while the Municipal Environmental Plan includes legally binding regulations that override zoning plans and establish permit criteria (Blankvoort, 2025). Municipalities also set local building codes, issue development permits such as building licences, and participate in public-private partnerships (Holleman *et al.*, 2025). They carry out routine planning and implement policies through local regulatory frameworks.

5.3.4 Planning Legislation

- (i) *Environment and Planning Act* ('*Omgevingswet*') of 2024.

Recognised as a major reform in Europe, the *Environment and Planning Act* of 2024 provides the basis for planning legislation in the Netherlands by merging 26 laws and 250 documents into a single framework, replacing the *Spatial Planning Act (WRO)* of 2008 (Holleman *et al.*, 2025). The act aims to simplify and modernise the Netherlands' spatial planning framework while promoting sustainable development, improving land viability, and protecting the environment (Blankvoort, 2025). Its goals include enhancing environmental quality, combating climate change, and safeguarding public health. The act concerns alterations to the physical environment and requires an assessment of how development projects might affect neighbouring residents or businesses. It also aims to reduce the number of permits required for development approval and to use a single permit for the process (Bloemberg *et al.*, 2024). The act deems the integration of spatial planning and environmental management essential to minimise conflicts, especially at the local level. It therefore allows flexible practices, particularly in green energy and sustainability, to uphold environmental standards. However, the effects of the act are yet to be seen, as it remains relatively new (Brand & Zonneveld, 2024).

A governmental decree with legal authority serves as an official directive for implementing, enforcing, or regulating policy. The Netherlands' legislative framework comprises four key decrees that support the main planning act (Zhou & Shen, 2017). The *Environment and Planning Act ('Omgevingswet')* of 2024 seeks to unify environmental and planning laws into a single framework, and these decrees are vital to its implementation and to addressing environmental and spatial planning issues. The four governmental decrees are:

(i) *Environment Decree ('Omgevingsbesluit')*.

This decree is a fundamental legislative instrument that sets out the comprehensive rules and procedures for implementing the *'Omgevingswet'* (2024). It articulates the legal framework for decision-making and the allocation of responsibilities across government branches (van den Broek, 2015). Furthermore, this decree provides a systematic approach to *environmental governance, which is imperative for the effective and successful enactment of the 'Omgevingswet'* (2024) (Bulles *et al.*, 2017).

(ii) *Environmental Quality Decree ('Besluit kwaliteit leefomgeving')*.

The objective of this decree is to uphold and enhance the quality of life. It introduces new directives and guidelines on noise, air quality, and other environmental factors, replacing the previous uniform national standards with more adaptable, region-specific policies. This decree supports improved, context-sensitive planning and management by empowering local authorities to set specific environmental quality requirements (Benhadi, 2016).

(iii) *Environmental Activities Decree ('Besluit activiteiten leefomgeving')*.

This decree regulates activities that affect the physical environment, including changes in manufacturing, construction, and land use. It improves compliance for both individuals and businesses by consolidating multiple existing requirements into a single framework (van den Broek, 2015). It aims to facilitate more efficient project implementation by reducing administrative costs and optimising the permitting process (Verschuuren, 2004).

(iv) *Environment Buildings Decree ('Besluit bouwwerken leefomgeving')*.

This decree encompasses regulations governing building and construction activities. By incorporating diverse architectural rules and standards, it ensures that construction projects adhere to aesthetic, environmental, and safety criteria (van den Broek, 2015). Furthermore, this directive advances sustainable development by endorsing energy efficiency and the use of environmentally friendly building materials (de Graaf, 2011).

5.3.5 Spatial Planning

- **Strategic Planning: Policy Framework**

Furthermore, the Netherlands' planning policy framework is characterised by a comprehensive, integrative approach that effectively balances the autonomy of local and regional authorities with national objectives. This framework is rooted in the country's historical context of managing a densely populated, urbanised environment.

(i) *National Climate Agreement ('Klimaatakkoord') of 2019.*

The objective of this agreement is to reduce emissions by 49% by 2030 compared with 1990 levels (Hellemans, 2018). To achieve this, the Netherlands must annually capture 20 million metric tonnes of CO₂, which requires strategies such as carbon capture and storage to meet emissions targets (Schaap, 2023). The focus is on increasing the utilisation of biomass, solar, and wind energy to increase the country's share of renewable energy sources (Hammingh *et al.*, 2019). The climate agreement specifically emphasises energy consumption within the agricultural sector. The Netherlands aims to promote energy-efficient agriculture that maintains productivity while reducing emissions (Verschuuren, 2019). The adoption of circular economy principles redirects attention to the industrial sector, where the Netherlands aims to reduce its reliance on fossil fuels (Drissen & Vollebergh, 2018). To ensure that strategies adequately address specific climate requirements, the agreement promotes the development of Regional Energy Strategies tailored to each region (Schaap, 2023). However, the agreement largely relies on voluntary

measures, although regulatory actions are considered necessary to achieve its objectives (Verschuuren, 2019).

(ii) *National Environmental Vision ('Nationale Omgevingsvisie') (NOVI) of 2020.*

The *NOVI* of 2020 aims to design and develop spaces that promote social and physical activity, thereby fostering a healthy living environment conducive to such activity (Bremen *et al.*, 2022). It recognises that the quality of an individual's environment affects their health. Therefore, policies should consider how development influences social and physical surroundings to encourage healthy lifestyles (Abate, 2022). The *NOVI* of 2020 aligns with the Netherlands' climate objectives and supports the sustainable transition of agricultural systems. This transition seeks to balance sustainability and productivity while addressing issues such as water quality. Furthermore, integrating connected natural spaces to boost biodiversity is crucial to the vision's strategy of making spatial planning more nature-inclusive (Bremen *et al.*, 2022). To achieve the aims of the *NOVI* of 2020, collaboration across sectors such as nature conservation, biodiversity, and climate is essential within their respective policy frameworks (Abate, 2022). Furthermore, provinces and municipalities develop environmental visions for planning that align with the *NOVI* of 2020, called a '*Provinciale Omgevingsvisie*' and a '*Gemeentelijke Omgevingsvisie*'.

(iii) *National Mobility Strategy ('Nationale Mobiliteitsstrategie') of 2022.*

The Netherlands aims to make cycling and electric vehicles the primary modes of transport in urban areas (Dijk, 2022). This shift aims to mitigate the environmental impacts of transport systems, improve air quality, and reduce emissions (Altena, 2023). It may also help alleviate congestion and promote public health by encouraging the use of public transport or non-motorised modes such as walking. Nonetheless, this requires an integrated approach that prioritises accessibility over mere mobility improvements. Historically, implementing mobility policies has faced challenges due to constraints such as financial pressures and extended timelines (van der Drift *et al.*, 2022). Consequently, this strategy seeks to employ pre-implementation controls and conduct post-implementation evaluations to ensure that objectives are achieved. The goal is to develop a collaborative transport system where all modes are optimally utilised for the movement of goods and individuals (Rongen *et al.*, 2022).

(iv) *National Housing and Construction Agenda ('Woningbouwagenda') of 2022.*

To meet the growing demand for housing in urban areas, new developments should be built (Haffner, 2023). Addressing the housing shortage is essential to ensure supply keeps pace with urban residents' demand, preventing the housing sector from falling behind. A range of housing

types will be provided to accommodate different income groups while remaining affordable (Haffner, 2025). However, before constructing new homes, the strategy focuses on making the best use of existing housing to ease pressure on the market (Jonkman *et al.*, 2022). Consequently, it proposes measures to promote the efficient use of space. The affordability of housing remains the primary objective, with initiatives to prevent excessive rent increases and enhance housing access for low- and middle-income communities (Haffner, 2023). Moreover, the strategy aims to make all homes gas-free by 2050 and promotes circular economy principles in the construction sector.

- **Statutory Planning: Development Control**

Within the planning framework of the Netherlands, essential planning instruments and procedures exist that serve as development control mechanisms, categorised as follows:

- (i) *Environmental Programmes ('Omgevingsprogramma's')*.

The integration of spatial and environmental planning in the Netherlands is paramount, given that spatial planning has historically been administered at the local level, whereas environmental planning has been overseen at the national level. The various provinces of the Netherlands have independently developed their own environmental programmes to enhance rural environmental quality (Bulles *et al.*, 2017). Consequently, these programmes are tailored to the unique needs of each province. To address local issues and develop area-specific solutions, regional environmental policy areas have been established. The primary objective of these policies is to foster sustainable regions and to provide financial support for their realisation (Clement, 2007). Moreover, enforcing environmental quality standards within the Netherlands is particularly critical in urban areas characterised by high population density, which are often subject to significant environmental pressures (Groothuijse & Uylenburg, 2014). Integral environmental zoning is used to delineate pollution spillovers and address their consequences, thereby further integrating spatial planning with environmental policy. Programs aimed at enhancing buffer zones and natural areas have been allocated substantial funding. Additionally, strategic environmental assessments are carried out to evaluate the impact of plans and programmes on sustainable development, including the mandatory conduct of environmental tests (Bulles *et al.*, 2017).

- (ii) *Environmental Permit ('Omgevingsvergunning')*.

The integration of 25 existing permit systems in the Netherlands into a single environmental permit makes this permit particularly noteworthy. It encompasses permits for environmental management, conservation, spatial planning, and development (van der Geest, 2018). The objective of consolidating various permits is to enhance regulatory coherence across sectors and

to reduce administrative burdens on municipalities, thereby simplifying the legal framework for these sectors (Bulles *et al.*, 2017). Consequently, when a development proposal is submitted, only a single permit application is required (Broekmeyer & Sanders, 2016). This ensures that environmental conservation and protection are consistently considered in development proposals and procedures (Broekmeyer & Sanders, 2016). Furthermore, this new permit system fosters informed decision-making, leading to improved, more timely outcomes (van der Geest, 2018).

(iii) *Environmental Plan ('Omgevingsplan')*.

Instead of traditional zoning plans, the environmental plan adopts a flexible, outcome-oriented approach, establishing legally binding local regulations for the physical environment (Blankvoort, 2025). It is expected that environmental plans will detail measures to promote sustainable development practices, such as the use of sustainable heating systems rather than traditional ones (Hollemans *et al.*, 2025). By employing source-oriented, area-oriented, and quality-oriented strategies, the plan aims to optimise the use of environmental space. This promotes sustainable development and environmental preservation by ensuring a fair distribution of resources and space (van der Geest, 2018). To safeguard the value of environmental areas, the plan incorporates conducting environmental impact assessments to evaluate the potential effects of development on the environment. This is vital for fostering environmental awareness among stakeholders (Hollemans *et al.*, 2025). This strategy enables towns to adapt to changing priorities and conditions by balancing environmental preservation with spatial development (Blankvoort, 2025). Furthermore, environmental plans are formulated at provincial and municipal levels, known as '*Provinciale Omgevingsplan*' and '*Gemeentelijke Omgevingsplan*'.

Figure 5.8 shows the planning framework for the Netherlands.

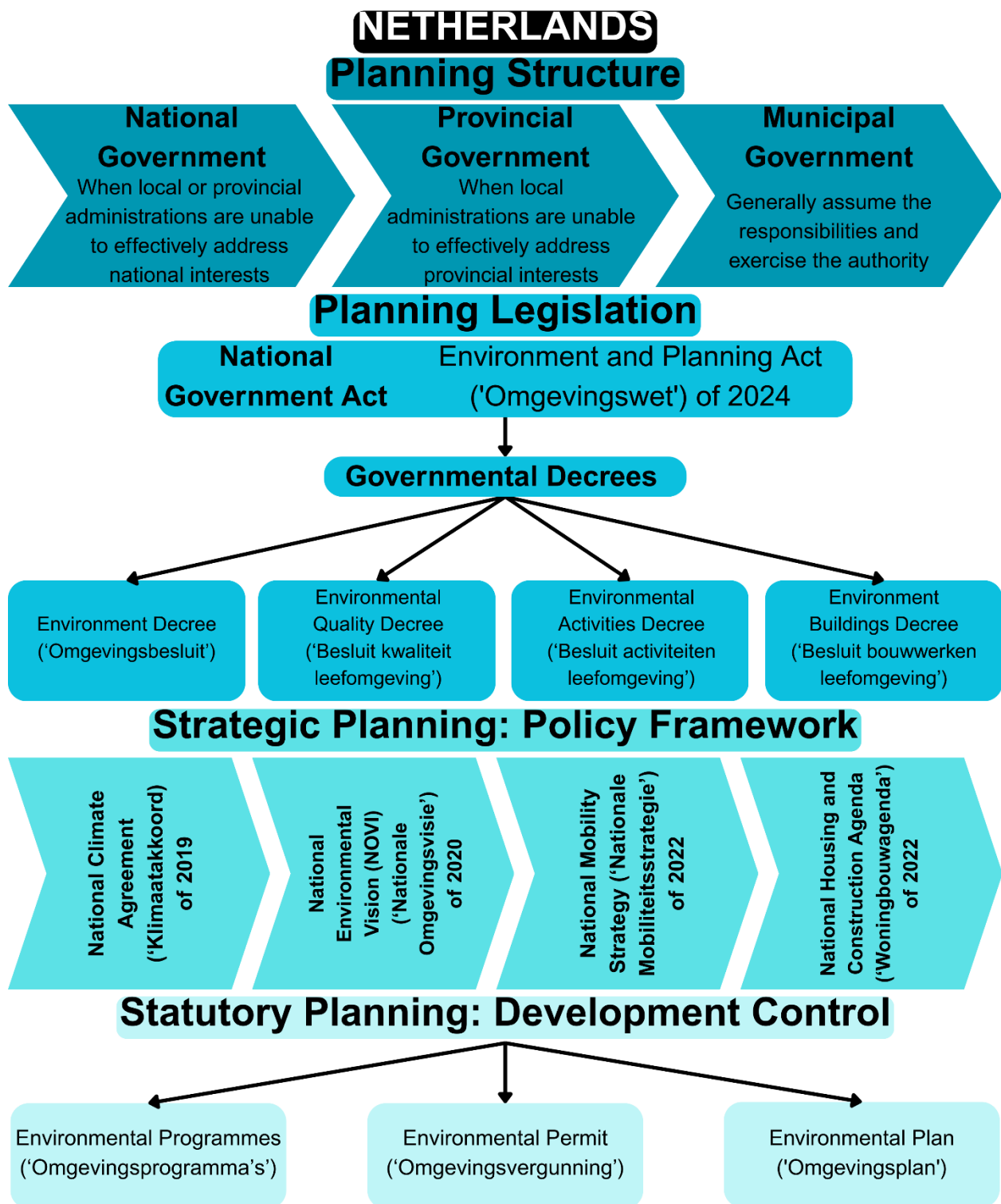


Figure 5.8: Planning Framework of the Netherlands

Source: Own construction, based on 'Omgevingswet' of 2024

5.3.6 Implementation and Challenges

The Netherlands is renowned for its advanced spatial planning system, marked by recent and significant reforms (Janssen-Jansen, 2016). These reforms were implemented to decentralise authority and strengthen local governments' power. They also facilitated the integration of sectoral plans into a unified environmental plan (Spaans, 2006). However, local governments struggle to adjust to their new responsibilities; therefore, there is a need for better coordination among government levels to help municipalities adapt and to reduce governance complexities (Zhou & Shen, 2017). The distinction between the public and private sectors has become more blurred due to the shift from an active to a facilitative land policy, creating difficulties with land ownership and zoning modifications. Consequently, rival interests compete for supremacy in places like Rijnenburg, creating a 'planning battle scene' (Buitelaar *et al.*, 2025).

Furthermore, institutional barriers and market viability issues have hindered the implementation of popular transit-oriented development strategies (Poiani & Stead, 2014). The limited success of transit-oriented development has highlighted the need for context-specific strategies (Tan *et al.*, 2014). Integrating spatial planning and environmental management into a single framework has been challenging because of differing schools of thought and competing interests. Additionally, such efforts have frequently failed, and alternative solutions have been proposed (Wissink, 2014). Integrating water management into spatial planning has introduced additional challenges; however, to effectively achieve the Netherlands' goals, this integration is essential (van der Heijden *et al.*, 2014).

Numerous urban intensification projects have been postponed or cancelled due to the financial turmoil, which has led traditional urban planning institutions to fail. This has necessitated reevaluating growth assumptions and developing equitable methods of urban intensification (Zhou & Shen, 2017). Furthermore, the rapid transformation of urban areas into metropolitan regions has challenged the Netherlands' planning practices for combining urban and rural areas. Rethinking spatial planning concepts is essential to achieve the distant goal of an integrated approach to planning built-up and green spaces (van den Brink *et al.*, 2006). However, these challenges present opportunities for innovative reform ideas.

5.4 Canada

5.4.1 General Country Information

Situated in northern North America, Canada is the largest country in the Western Hemisphere and the second largest in the world. It covers 9,984,670 square kilometres (Ghassemi & White,

2007) and, with a population of 41,528,680, ranks 36th globally. Toronto, with a population of 3 million, is recognised as the most populous city in Canada (World Bank, 2023). The population density is relatively low, at four people per square kilometre. Ottawa, the capital city, is located where the Rideau and Ottawa Rivers meet, in the province of Ontario (Shelekpayev, 2021). Canada's landscape includes the Rocky Mountains and more than a million bodies of water, both of which significantly influence its socio-economic patterns across the ten provinces and three territories.

Land use includes agriculture, forestry, conservation, and recreation, all of which are vital to sustainability and economic growth. Most of Canada's 65 million hectares of farmland are in the south of the country. Forestry affects biodiversity and carbon storage (Zerriffi *et al.*, 2022). Only 10.5% of terrestrial areas are protected, emphasising the need for conservation, particularly as urbanisation rises to 83% (Wulder *et al.*, 2018). Canada's GDP is valued at \$2.24 trillion, making it the 10th-largest in the world, with the service sector accounting for 70%. The poverty rate has experienced a slight increase, reaching 10.2% in 2023, compared to a low rate of 6.4% in 2020. With an inequality coefficient of 0.299 and an HDI of 0.929, Canada is recognised for its high level of development (World Bank, 2023). Figure 5.9 presents a locality map and general country information of Canada.

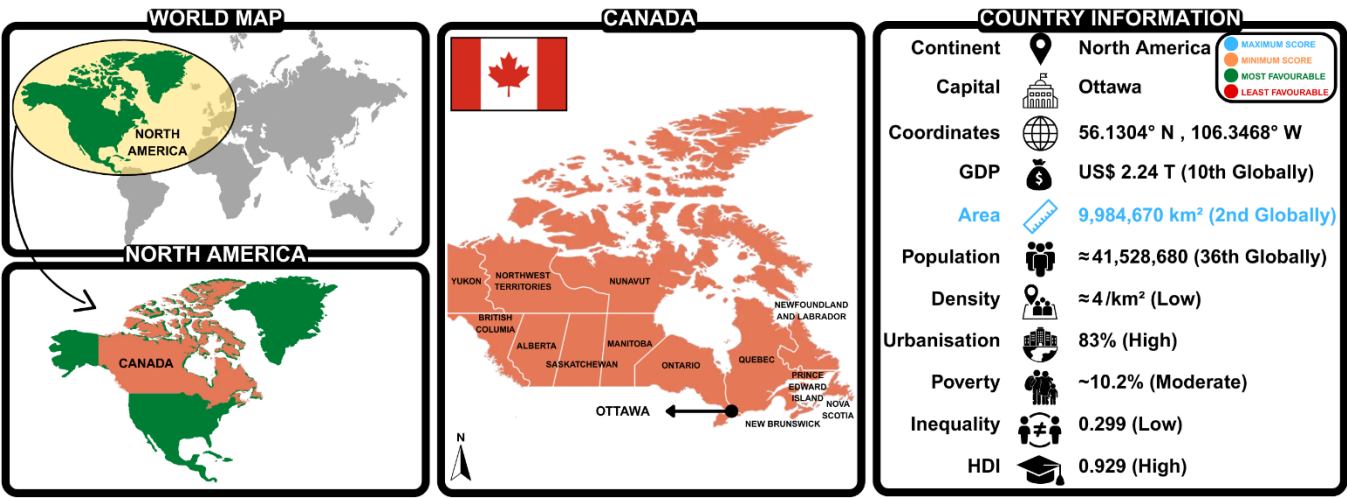


Figure 5.9: Locality Map and General Country Information of Canada

Source: Own construction, based on World Bank (2023)

5.4.2 Administrative Structure

Canada operates under a constitutional monarchy, with the monarchy serving as the head of state and the Prime Minister as the head of government (Berger, 2019). Federal elections are held every four years; however, they may be held earlier if deemed necessary. The bicameral

legislative branch comprises the appointed Senate (Franks, 1987) and the elected House of Commons (Malcolmson & Myers, 1997), which together total 443 members. It is predominantly controlled by the Liberal and Conservative parties. Regulatory commissions and agencies play a crucial role, shaped by public administration and legal frameworks (Doern *et al.*, 1975). Canada's federal parliamentary system supports decentralisation, empowering provinces with authority over areas such as healthcare, education, and social services (Lecours, 2023).

Provincial and territorial governments oversee most public expenditure, while the federal government manages national concerns, including defence, Indigenous affairs, and equalisation payments (Hataley & Leuprecht, 2014). The equalisation scheme ensures that provinces can provide comparable services by mitigating financial disparities. Recent reforms have focused on organisational culture and Indigenous issues (Brown, 2023). Canada has more than 3,500 municipalities, governed by provincial laws, that oversee local services such as water, waste management, and law enforcement (Johns *et al.*, 2007). In some provinces, regional governance oversees municipal services, led by elected councils (Bernier *et al.*, 2005). Figure 5.10 provides a visual representation of Canada's administrative structure.

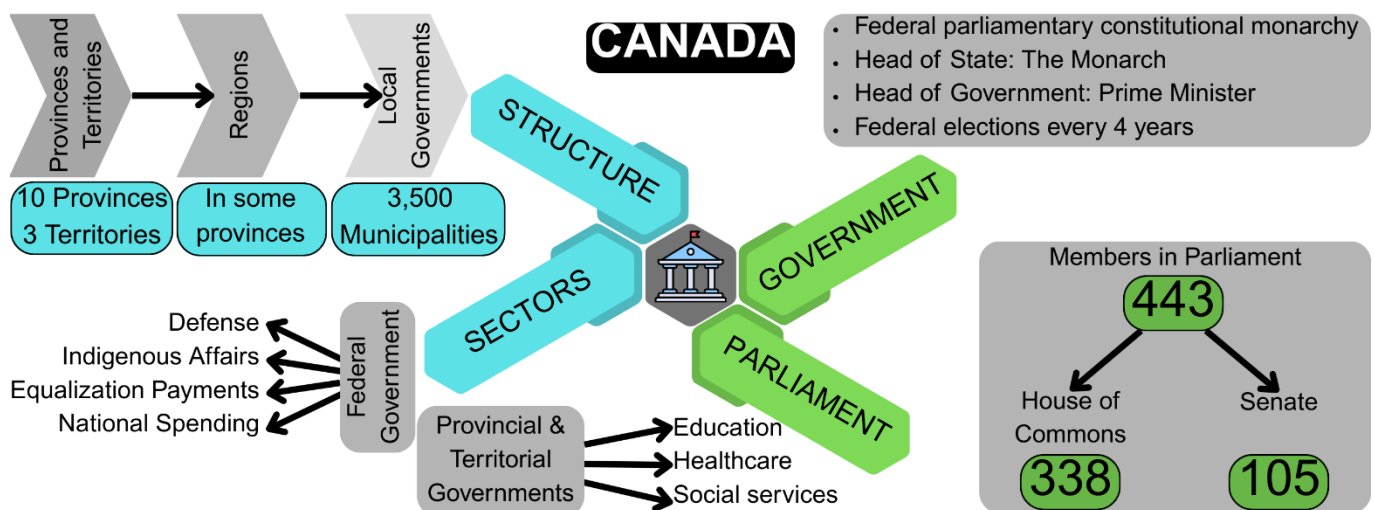


Figure 5.10: Administrative Structure of Canada

Source: Own construction, based on Doern *et al.* (1975), Brown (2023) and Bernier *et al.* (2005)

5.4.3 Planning Structure

Over the past quarter-century, municipal regulatory frameworks across Canada have undergone significant transformation. Municipalities in Canada now enjoy greater autonomy, expanded authority, and more flexible legal mechanisms to self-govern and meet their community service responsibilities, in contrast to the more limited regulatory frameworks of the past. Planning legislation in Canada is organised hierarchically into three levels (Skelton, 2012). The

constitutional framework that underpins Canada's planning system delegates land-use regulation authority to various levels of government. The Canadian approach reflects its federal structure and constitutional division of powers, setting it apart from countries with centralised governance systems. Section 92(8) of the *Constitution of Canada* (1982) grants provinces exclusive jurisdiction over municipal institutions within their territories. Consequently, the legislative framework governing planning in Canada requires each province to establish its own comprehensive planning statutes (Cullingworth, 2015). Therefore, the legislative hierarchy in Canada is outlined as follows (Skelton, 2012):

- (i) *Federal Government:* The federal government has limited involvement in land-use planning due to constitutional restrictions. Its indirect influence on planning practices arises through managing federal land and property, overseeing cross-border relations, allocating infrastructure and housing funds, mandating municipal climate adaptation (Henstra, 2013), and conducting environmental assessments of significant developments. Additionally, the federal government influences planning through national policy frameworks (Gordon & Virginillo, 2024).
- (ii) *Provincial and Territorial Government:* Holding primary authority over planning and land-use management, their constitutional power guarantees exclusive jurisdiction over municipal institutions (Cullingworth, 2015). Provincial planning responsibilities include judicial procedures such as appeals and tribunals, approval of major development projects, supervisory roles and sanctioning processes for municipalities, dissemination of provincial policy declarations, and the enactment of legislative measures relevant to planning (Goldberg & Mark, 1985).
- (iii) *Municipal Government:* Although municipalities have the authority to implement policies, their powers are granted by provincial legislation. Municipalities are authorised to conduct public consultations, make decisions on local planning, issue development permits, and enforce zoning bylaws (Henstra, 2013).

5.4.4 Planning Legislation

The constitutional provision indicates the absence of a federal planning act, suggesting that land use planning is not a responsibility mandated by the *Constitution of Canada* (1982) for the federal government. Although federal environmental laws do not explicitly govern land use planning, they significantly influence planning decisions. Specifically, the *Species at Risk Act (SARA)* (2002) affects development in ecologically sensitive areas; the *Impact Assessment Act (IAA)* (2019) supports the assessment of major development projects; the *Canadian Environmental Protection*

Act (EPA) (1999) creates regulatory frameworks for environmental protection; and the *Greenhouse Gas Pollution Pricing Act (GGPPA)* (2018) shapes development trends.

Municipalities operate as institutions under provincial jurisdiction, and provincial legislation grants local governments the authority to create plans (Henstra, 2013). According to the *Constitution of Canada* (1982), municipalities are 'creations of the provinces', giving provincial governments exclusive control over land use planning and the organisation of local government structures (Cullingworth, 2015). Stemming from Canada's constitutional framework, the decentralised planning system primarily focuses on provincial authority, with each province and territory independently establishing its own planning act (Goldberg & Mark, 1985). Key provincial planning acts include:

(i) *Planning Act of 1990 for Ontario*

Economic circumstances and insufficient political backing contributed to the enactment of the *Planning Act* of 1990 (Richardson, 1981). This legislation serves as the primary legal framework for development control and land-use planning in Ontario. It enables municipalities to formulate official plans and zoning bylaws while ensuring that land-use regulations benefit the community. Provincial oversight is provided by the Local Planning Appeal Tribunal, formerly known as the Ontario Municipal Board. The Tribunal oversees land-use conflicts, taking public interests into account (Wright *et al.*, 2001). Municipal authority increased considerably through comprehensive reforms, while provincial oversight remained in place. Nevertheless, Magnusson (2005) argues that top-down planning approaches persisted despite the idea of local self-governance, leading to community dissatisfaction (*Planning Act* of 1990).

(ii) *Act Respecting Land Use Planning and Development of 1999 for Quebec.*

This legislation integrates North American urban planning practices with the principles of French civil law. It serves as the provincial legislative framework for municipal planning within Quebec's legal system. The act promotes sustainable development by integrating environmental, social, and economic considerations into land-use planning (Mudamburi, 2011). It also encourages the integration of land uses to maximise resource efficiency (Gurran, 2019). It emphasises empowering local authorities through a decentralisation strategy. Municipalities' decision-making autonomy allows them to incorporate democratic governance into planning, with a focus on public participation. Nevertheless, the tension between decentralisation and centralisation persists as a challenge and could affect the effective implementation of the act.

(iii) *Municipal Government Act of 2000 for Alberta.*

To enhance collaboration among municipalities, this legislation has undergone significant amendments since 2015 to reorganise and strengthen local governance (Hallstrom, 2023). These amendments led to the creation of growth management boards, which are responsible for developing growth plans to guide land-use decisions (Stewart, 2018). Before transitioning to conventional zoning regulations, this act initially introduced development control mechanisms. As a result, the approach taken by this act forms a development control framework characterised by discretionary decision-making (Stewart, 2018). Furthermore, with an emphasis on climate leadership, Alberta incorporates carbon-emissions targets into its legislative framework and requires the management of water and air quality (*Municipal Government Act* of 2000).

(iv) *Urban and Rural Planning Act* of 2000 for Newfoundland and Labrador.

This legislation governs urban and rural planning and land-use management within the province, with a particular emphasis on the region's distinctive planning challenges. To promote socio-economic development and environmental preservation, the act aims to advance sustainable development through efficient land utilisation. Common issues encountered by the province include ecological concerns and a decline in rural population and economic activity, notably in Trepassey (Tye, 2008). Discord among rural local governments hampers water source protection, leading to shortcomings in water conservation initiatives (Eledi *et al.*, 2017). To delineate the scope of public policy and ensure effective regulation and implementation, this act serves as the legal framework for planning initiatives. Furthermore, conflicts arise between public policy and government actions, rendering this act indispensable (Lei & Cheng, 2015). Given the importance of environmental protection for the province's future, the act seeks to foster meaningful stakeholder participation and establish supportive legislation to enhance the management of environmentally sensitive resources. Consequently, the province's unique character necessitates enhanced education and collaboration among stakeholders, as well as proactive planning to meet the needs of both rural and urban areas. As socio-economic and environmental conditions within the province continue to change, regular updates to the act are essential to meet current requirements. Gallent and Shaw (2007) assert that integrating spatial planning and area action plans can enhance the effectiveness of this legislation in managing the urban-rural fringe within the province.

(v) *Planning Act* of 2005 for Manitoba.

Manitoba's freshwater sources are recognised as vital and require protection and management. As a result, this legislation establishes watershed protection plans developed by conservation districts (Cuvelier & Greenfield, 2016). The act highlights the importance of public participation in planning processes, particularly in involving First Nations and enhancing stakeholder

engagement. Effective public involvement in planning and land use is essential for addressing specific community needs; however, the public is not always fully included (Kidd & Sinclair, 2007). The main aim of the *Planning Act* of 2005 is to align provincial policies with the United Nations 2030 Agenda for Sustainable Development (Evans-Boudreau, 2025).

(vi) *Planning and Development Act of 2007 for Saskatchewan.*

This legislation underscores the importance of comprehensive land-use planning and development, particularly in peripheral regions characterised by hazardous features such as slope instability. It advocates collaboration with First Nations to effectively oversee watershed planning, recognising their essential role in managing natural resources (Baijius & Patrick, 2019). Although cooperation with indigenous communities presents ongoing challenges, it remains a vital aspect of sustainable development and inclusive progress. Nonetheless, the prevailing uncertainty and complexity within the current regulatory framework may lead to insufficient planning and land-use management (Krupa, 2019). Risk assessment and zoning regulations are crucial in this province, as much of its land is unstable for development. The protection of public safety and property is of utmost significance.

(vii) *Planning and Project Assessment Act of 2013 for Nunavut.*

The need to harmonise economic development with environmental preservation, especially in contexts involving indigenous populations, necessitated this legislation. Its purpose is to enhance project planning and environmental evaluation within the province by integrating public participation into decision-making processes, thereby incorporating local insights and facilitating improved planning outcomes (Carlson *et al.*, 2018). This is accomplished through the establishment of advisory committees to oversee public engagement; however, their participation is frequently restricted. Consequently, to ensure environmental protection, development initiatives must evaluate potential ecological impacts and systems before starting (Bernauer *et al.*, 2022). It is noteworthy that follow-up assessments of ecological evaluations are rarely performed. Additionally, the *Nunavut Land Claim Agreement* of 1993 acknowledges and safeguards land claims and the governance of indigenous communities. An ongoing conflict persists between large-scale projects, which often do not yield benefits to the community, and small-scale initiatives, which tend to have limited economic contribution (Carlson *et al.*, 2018).

(viii) *Local Government Act of 2015 for British Columbia.*

Under this Act, the *Community Charter* of 2003 applies to all local government entities except Vancouver, for which the *Vancouver Charter* of 1953 provides a specific legislative framework.

Notably, Bill 27 mandates that each municipal community plan include objectives to reduce greenhouse gas emissions (Harris & Patterson, 2023). To address community concerns, local governments have been granted increased autonomy to enhance collaboration across levels of governance (Curry, 2018). However, this objective has not been fully realised, as local governments continue to encounter challenges despite the flexibility provided at the provincial level. Curry (2018) asserts that each municipality should develop its own distinctive policy implementation strategies, given variations in size and local context that necessitate different approaches. Furthermore, the fiscal capacity of small municipalities may be insufficient to support new government initiatives, thereby underscoring the inadequate financial assistance provided by the provincial authorities (Ryser *et al.*, 2022). The implementation of *the Local Government Act* of 2015 consequently encountered challenges.

(ix) *Community Planning Act of 2017 for New Brunswick.*

The act aims to enhance the capabilities of municipalities and assign them greater responsibilities, thereby enabling inclusive planning (Haley *et al.*, 2025). Given the housing crisis, this legislation enables municipalities to implement structured housing initiatives tailored to local needs. Municipalities are equipped with tools to provide affordable housing and increase housing supply (Haley *et al.*, 2025). To realise these objectives, public participation is essential to foster people-centred planning and establish an inclusive decision-making process. Additionally, shared service agreements have been introduced to support local governments lacking formal administrative structures, thereby facilitating the optimal and cost-effective use of resources. To promote equity among community members, the province endeavours to ensure that health services are accessible to all individuals. Moreover, the act underscores the importance of considering broader social and environmental factors within the planning process.

(x) *Other Provinces and Territories.*

Each remaining province (Nova Scotia and Prince Edward Island) and territory (Northwest Territories and Yukon) has its own legislative framework for supporting planning activities. A common feature is the delegation of zoning authority to local governments. However, approaches to implementing strategies and institutional structures vary. These specialised planning statutes govern the authorities responsible for municipal planning and their related processes across the remaining provinces within a consistent legislative framework.

5.4.5 Spatial Planning

- **Strategic Planning: Policy Framework**

In Canada, the planning policy framework is hierarchical (Skelton, 2012). The federal government is responsible for federal land and property, conducts environmental assessments for major projects, allocates funding for infrastructure that influences development patterns, and develops climate change policies that affect planning decisions (Henstra, 2013). The provinces hold authority over land use planning, providing broad guidelines through provincial policy frameworks that are implemented locally through regional and municipal official plans (Cullingworth, 2015):

(i) *Pan-Canadian Framework on Clean Growth and Climate Change* of 2016.

Essentially, this strategy aims to promote clean growth and combat climate change, as reflected in its name. Additionally, Canada employs this approach to facilitate governance collaboration between the federal government and provinces. In line with the *Paris Agreement* of 2015, Canada has established national carbon-pricing initiatives, such as a carbon tax, to encourage reductions in carbon emissions (Parry & Mylonas, 2018). Each province may set carbon pricing at its own discretion, in accordance with national principles; for example, Nova Scotia utilises a cap-and-trade system (Chalifour, 2016). The main objectives are to minimise carbon emissions, integrate green technology into planning processes, and improve resilience to climate change. Indigenous communities, historically marginalised in policymaking and currently being addressed through policy, may still face marginalisation, as Reed *et al.* (2021) warn, emphasising the need for climate policies informed by traditional knowledge and approaches. Canada anticipates significant economic and social benefits from a low-carbon economy while also supporting efforts to combat climate change (Stern & Stiglitz, 2023). This framework is also influenced by international initiatives, notably those of the United States (Boyd & Rabe, 2019).

(ii) *National Housing Strategy* of 2017.

Addressing national housing challenges is the primary objective of this strategy. It aims to provide adequate, affordable, and suitable housing for all citizens. Within this framework, various programmes and policies are in place to reduce housing shortages, including the *Canada Housing Benefit* of 2023, which provides financial support to meet the housing needs of disadvantaged communities. Leviten-Reid *et al.* (2024) advocate improved coordination between social and housing assistance services, noting that a housing gap for individuals with disabilities has been identified, revealing existing inefficiencies. Consequently, this strategy has not yet fully realised its potential (Suttor, 2025).

(iii) *National Infrastructure Assessment of 2021: “Building the Canada We Want in 2050”*

This involves strategic planning for future infrastructure needs while addressing current infrastructure challenges. The lack of internet infrastructure in rural regions marginalises these regions from the national economy, as internet connectivity fosters social and economic advancement. Community-based networks can bridge this divide and promote digital progress (Dolan, 2021). Canada depends on the United States for its internet infrastructure, which may compromise the security of Canadian data, underscoring the need for a comprehensive digital strategy to improve internet service quality. Effective governance of infrastructure investments can ensure that priorities align with urgent needs and that environmental, social, and economic factors are duly considered. Accordingly, a strategic vision for sustainable infrastructure, with active public participation, is essential to address local needs. Achieving sustainable development goals is heavily reliant on robust infrastructure; consequently, the significance of sustainable infrastructure remains paramount (Dolan, 2021).

(iv) *Canada’s 2030 Emissions Reduction Plan of 2022.*

The country endeavours to significantly reduce its emissions by 2030 and, where feasible, achieve net-zero emissions (Bailie *et al.*, 2023). The urgent need to adapt to climate change underscores the importance of this strategy. Specifically, it aims to reduce emissions by at least 40-50% relative to 2005 levels by 2030. Implementing carbon pricing not only reduces emissions but also improves public health. Consequently, this approach promotes the use of clean energy sources and energy efficiency measures, which require government collaboration and regulatory frameworks. Oil and gas are recognised as the main contributors to national emissions, and this strategy aims for targeted reductions in these sectors (Bailie *et al.*, 2023). Nevertheless, such measures might lead to possible declines in economic activity, among other challenges. Therefore, it is essential to carefully develop policies and encourage stakeholder collaboration to support the transition towards a low-carbon economy. Accordingly, each region should adopt customised approaches to achieve these objectives, taking local contexts into account (Campbell-Durufilé, 2024).

(v) *Federal Sustainable Development Strategy of 2022.*

This strategy focuses on Canada’s sustainable future by addressing environmental challenges, such as biodiversity loss and degradation, while also prioritising socio-economic development. It aims to align with the United Nations Sustainable Development Goals (Lazarou, 2023). However, achieving these objectives requires fostering collaboration across levels of government in decision-making to ensure a shared vision and mutual understanding (Markina, 2022).

Furthermore, this strategy underscores the importance of reducing emissions and aims to foster the development of a low-carbon economy. Recognising that social development is an integral component of sustainable development, this strategy seeks to improve the quality of education and promote greater equality, particularly for disadvantaged groups (Lazarou, 2023).

(vi) *National Adaptation Strategy of 2023.*

The Federal Government has established the *Climate Adaptation Platform* of 2023 to facilitate the exchange of adaptation experiences and information on climate strategies. To encourage research and training on climate change, various provinces have created regional hubs, such as CLIMAtlantic (VanderZwaag *et al.*, 2023). This initiative improves collaboration among governmental entities within the limits of modest federal guidance. The inclusion of Indigenous populations, along with their knowledge and perspectives on climate change, is clearly reflected in this strategy. It not only highlights environmental protection but also focuses explicitly on marine conservation and the development of aqua-based adaptation efforts for sectors managing aquatic resources. Furthermore, the strategy emphasises the importance of protecting species at risk within Canada. Overall, it is crucial to strike an appropriate balance between top-down and bottom-up approaches to effectively meet climate adaptation objectives.

- **Statutory Planning: Development Control**

Municipalities enforce each province's planning framework through a range of development control mechanisms:

(i) *Official Plans.*

Official plans provide a framework for local decision-making and development in Canada. Nonetheless, McCain *et al.* (2022) observed that these plans often neglect to integrate transportation planning into spatial planning processes. Only a limited number of official plans explicitly address transportation considerations, creating a noticeable gap between planning initiatives and their implementation. Furthermore, some official plans inadequately address demographic-related planning challenges, thereby overlooking community needs (Vincent *et al.*, 2022). Municipalities in British Columbia are mandated to incorporate climate change adaptation and mitigation strategies into their official plans (Baynham & Stevens, 2014). Additionally, the cities of Ottawa and Toronto embed smart-growth principles in their official plans to curb urban sprawl.

(ii) *Zoning Bylaws.*

The zoning bylaws constitute a comprehensive framework of land-use regulations that serve as the principal instrument for land-use governance in Canada (Kuefler, 2022). They encompass rules on setbacks, height restrictions, density controls, and designated land-use zones. Although minor deviations and amendments may occur, zoning bylaws are used to enforce official plan policies at the property level. Municipalities have the authority to establish zoning bylaws within their jurisdictions, under provincial oversight. Furthermore, various zoning methodologies are employed across Canada, including performance zoning, form-based codes, and Euclidean zoning (Lemmens, 2009). However, in certain instances, Euclidean zoning has led to degradation and urban sprawl; consequently, form-based and performance-based zoning practices have been implemented. Certain municipalities have employed zoning bylaws to restrict the development of drive-through restaurants to enhance public health and mitigate traffic congestion (Nykiforuk *et al.*, 2018). Alberta's zoning initiatives focus on supporting smart growth (Lemmens, 2009), whereas Toronto's strict zoning has led to a housing crisis (Kuefler, 2022).

(iii) *Subdivision Control.*

This mechanism oversees land subdivision and plot creation, in conjunction with zoning bylaws (Sorensen & Hess, 2015). Throughout development, it mandates an environmental assessment, land dedication, and infrastructure provision. The approval process comprises a multi-stage framework involving both provincial and municipal authorities. Subdivision regulation measures include standards that developments must meet, such as service requirements, parkland dedication, and engineering standards. In Ontario, urban planners use subdivision control measures to safeguard vulnerable water resources from development, particularly activities that affect lake conditions (Michalski & List, 1986).

(iv) *Site Plan Control.*

This instrument emphasises various aspects of site development, including site layout, parking facilities, landscaping, and architectural design. The primary authority overseeing these development elements lies with municipalities, which are responsible for reviewing and approving comprehensive site plans (Nnaemeka-Okeke, 2025). Nevertheless, once approval is granted, development projects must ensure compliance with the conditions specified in performance bonds and maintenance agreements. Site plan control offers greater flexibility for land use planning than conventional zoning bylaws, as it can be adapted to meet local needs and thereby promote improved public participation (Lemmens, 2009). However, this planning process may be characterised as time-consuming and complex.

(v) *Development Permits.*

Site-specific approval for development proposals is managed through development permits that include provisions for public participation and the enforcement of conditions. Municipalities have discretion to reject, modify, or approve applications. Nevertheless, provincial appeal bodies retain the authority to review and reconsider decisions on development permits issued by municipalities, provided they are contested or disputed by one or more affected parties (Stewart, 2018).

Figure 5.11 below shows the planning framework for Canada.

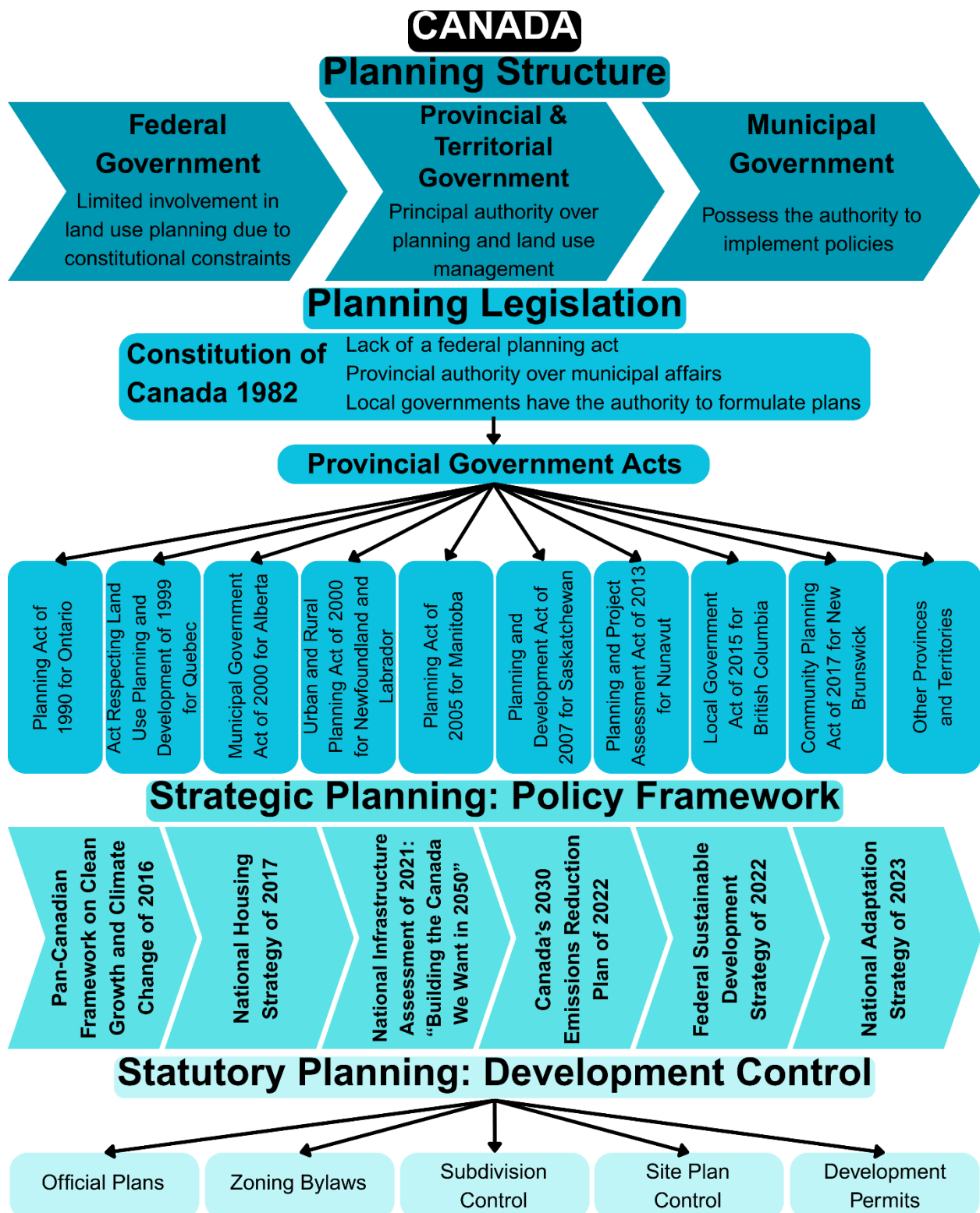


Figure 5.11: Planning Framework of Canada

Source: Own construction, based on the *Constitution of Canada* (1982)

5.4.6 Implementation and Challenges

The social, political, and economic conditions in Canada contribute to challenges in implementing planning practices (Tomalty & Skaburskis, 2003). Fragmentation within political structures in metropolitan regions such as Vancouver, Montreal, and Toronto complicates the implementation of planning initiatives (Grant, 2009). In certain provinces, integrating spatial and transportation planning is hindered by the need to adhere to multiple jurisdictions and governance frameworks (Tomalty & Skaburskis, 2003). Furthermore, Ontario faces difficulties in managing financial resources and planning initiatives, often resulting in projects that are not cost-effective (Grant, 2009).

This results in disputes between developers and planners over development costs and growth, leading to less efficient infrastructure (Tomalty & Skaburskis, 2003). Furthermore, the consistent use of traditional planning practices makes the implementation of smart growth and sustainable initiatives challenging. The inadequate implementation of these principles is also driven by financial constraints associated with these developments (Grant, 2009). Persistent disputes among sectors and regions impede the balance between economic growth and environmental protection.

This is further challenged by limited resources and the inadequacy of policies to address local demands (Budiman *et al.*, 2018). Greenbelts, an initiative implemented in Ontario, frequently receive municipal support but lack public support. Issues such as urban sprawl, the conservation of environmental areas, and the viability of agricultural land threaten the development of greenbelts. Moreover, outdated planning practices impede the timely implementation of theoretical concepts such as new urbanism and smart growth, often compounded by insufficient political will and support (Grant, 2009). Consequently, a significant gap exists between the formulation of planning initiatives and their practical implementation.

5.5 Conclusion

This chapter focuses on analysing spatial planning practices in developed countries, with particular emphasis on Australia, the Netherlands, and Canada. An overview of each country's characteristics was obtained through a brief examination of its general aspects. This investigation revealed the following:

- (i) Australia has the lowest population density yet the highest HDI ranking. This may indicate that Australia's urban development is characterised by low density, reflecting the dispersed distribution of its population. Given that Australia is the sixth-largest country in

the world by land area, large tracts of open space and undeveloped regions exist within the country. Australia enforces extensive environmental planning and conservation policies to safeguard these areas, which could complicate spatial planning. The country's high HDI ranking reflects its status as a highly developed country, implying that its spatial planning practices are sophisticated.

- (ii) The Netherlands has the smallest area and population, as well as the lowest poverty and inequality rates; however, it has the highest urbanisation rate. The country's size might suggest a high population density, leading to fewer open spaces and fewer undeveloped areas. Given the Netherlands' high urbanisation rate, urban planners face significant challenges in managing the rapid growth of urban areas. The low levels of poverty and inequality may indicate that the country's spatial planning practices effectively control urbanisation. This could also suggest that the Netherlands has few informal settlements due to its relatively low poverty and inequality levels.
- (iii) Canada is recognised as the largest country by land area and the second largest globally in terms of overall size. Additionally, the country's low population density suggests vast open spaces and undeveloped areas, while also reflecting a notable level of urbanisation. These two features may pose challenges for urban planners in environmental management and the rapid growth of cities.

Despite distinct administrative and planning frameworks in each country, several emerging trends highlight the inherent adaptability and sophistication of spatial planning in developed countries. The three countries exemplify the integration of strategic and statutory planning, thereby facilitating the achievement of long-term goals through regulatory mechanisms. Given the unique characteristics of each country, the methods used to achieve integration vary significantly.

Within a federal system, Australia emphasises environmental planning and regional development, driven by the economy's strong links to natural resources and geographical features. The Netherlands, characterised by its small land area and high population density, utilises a governance framework that is both centralised and collaborative, effectively balancing local autonomy with comprehensive national oversight. In contrast, Canada employs a decentralised governance system that grants municipalities considerable flexibility while aligning with national objectives to promote sustainable development.

In Australia, the Netherlands, and Canada, it is essential to recognise that public engagement and inclusivity are vital, despite differing strategies. In these countries, the success of spatial planning depends on robust institutional frameworks, policy integration, and the capacity to adapt to socio-environmental change. These elements are supported by rigorous legislation, clearly

defined governance structures, and decision-making processes grounded in empirical data. The aim of this research is to identify best practices and insights used by advanced economies to promote sustainable and equitable spatial development. Additionally, Chapter 8 will focus on this evaluation.

CHAPTER 6 SPATIAL PLANNING IN DEVELOPING COUNTRIES

6.1 Introduction

The theoretical insights drawn from the literature reviews in Chapters 3 and 4 will underpin the investigation of planning practices in developing countries. Specifically, in line with the primary objectives, this chapter seeks to: (i) analyse the impact of different practices on sustainability, equity, and urban and rural development; (ii) identify opportunities and best practices from case studies, with an emphasis on developing countries; and (iii) provide evidence-based recommendations to improve the effectiveness of South Africa's spatial planning practices (see Section 1.3, Objective i, ii and iii).

This chapter examines the spatial planning frameworks of developing countries to deepen understanding of how spatial planning is applied across countries. Figure 6.1 presents a visual representation of the chapter's structural framework.

Chapter 6: Spatial Planning in Developing Countries

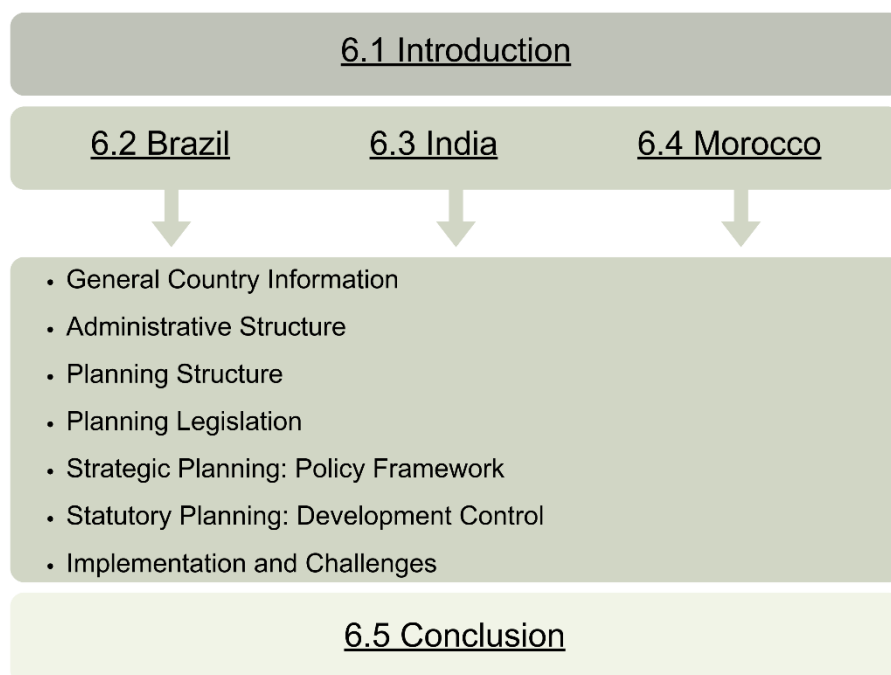


Figure 6.1: Structural Framework of Chapter 6

Source: Own construction

The following sections evaluate the spatial planning frameworks employed by the selected developed countries, specifically Brazil, India, and Morocco, as indicated in Chapter 2 (see Case

Study Design in Section 2.7), by focusing on each country's: (i) general country information, (ii) administrative frameworks for planning, (iii) legislative frameworks for planning (statutory planning), and (iv) how each country addresses challenges in sustainability, spatial equity, and urban and rural development (strategic planning). Figure 6.2 illustrates the geographical locations of the three selected developing countries for this study.

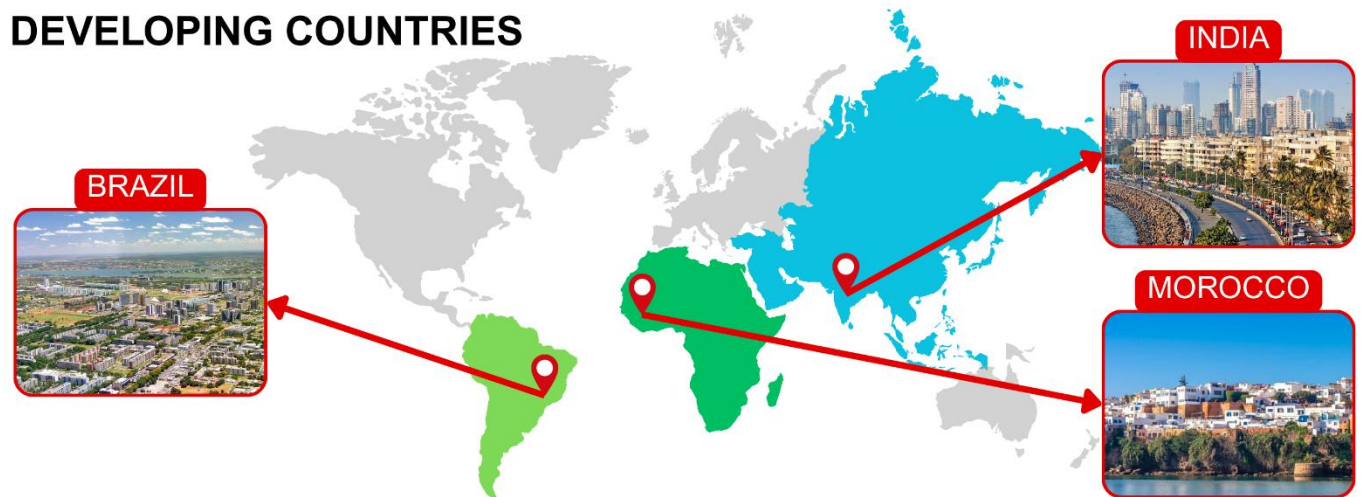


Figure 6.2: The Three Developing Countries Being Analysed

Source: Own construction

6.2 Brazil

6.2.1 General Country Information

Brazil, spanning over half of South America, is the continent's largest country and ranks as the fifth-largest worldwide, covering 8,515,767 square kilometres (Fitzpatrick & Anderson, 2005). It shares borders with most South American countries, except Chile and Ecuador, and lies east of the Atlantic Ocean. With Portuguese as its official language, Brazil exhibits significant ethnic and cultural diversity, a legacy of substantial immigration (Fitzpatrick & Anderson, 2005). According to the World Bank (2023), it is the sixth most populous country, with a population of 212,854,869, and has a low population density of 25.5 inhabitants per square kilometre. The country comprises 27 federal units, with Brasília serving as the capital and São Paulo as the most populous city, boasting an urbanisation rate of 88% (Souza, 2020). As the most biodiverse country on earth, Brazil allocates considerable land to agriculture, predominantly for livestock and soybean cultivation, thereby affecting natural environments.

It accounts for 14% of global beef production and 33% of soybean output (Stabile *et al.*, 2024), yet faces ongoing deforestation, particularly in the Amazon and Atlantic Forests (da Silveira *et al.*,

2022). With a gross domestic product (GDP) of 2.17 trillion USD, Brazil is the world's ninth-largest economy. The service sector contributes nearly 71% to GDP, encompassing activities such as finance and hospitality. Agriculture, although accounting for only 5.6% of GDP, remains vital to export commodities such as sugar, coffee, and soybeans. The manufacturing sector, which produces goods such as food products and aircraft, is the second-largest contributor to GDP (Souza, 2020). The poverty rate decreased to 27% in 2023 from 31% in 2022, with an inequality coefficient of 0.516 (World Bank, 2023). Brazil's Human Development Index (HDI) is 0.786, the highest among the three analysed developing countries (World Bank, 2023). Figure 6.3 presents a locality map and general country information for Brazil.

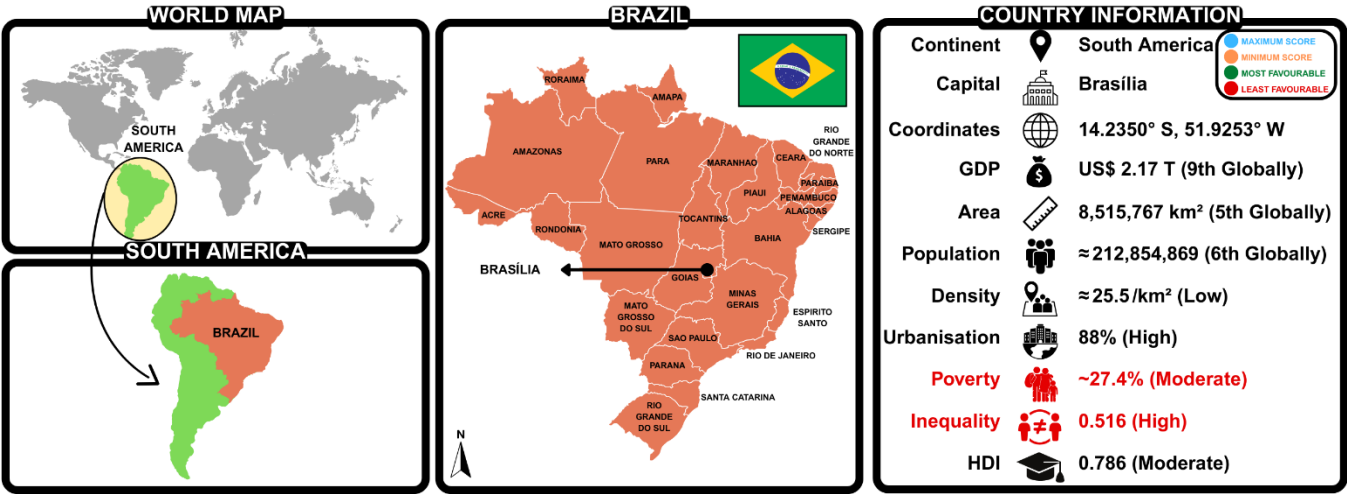


Figure 6.3: Locality Map and General Country Information of Brazil

Source: Own construction, based on World Bank (2023)

6.2.2 Administrative Structure

The Brazilian National Congress is a bicameral legislature comprising 513 Deputies elected through proportional representation, alongside 81 Senators. Each state and the Federal District elect three Senators, for a total of 594 parliamentary members (Bandeira *et al.*, 2016). The President, elected every four years with a limit of one re-election, serves as the head of both state and government. Brazil's public administration encompasses managerial, bureaucratic, and patrimonial models, which influence accountability and service delivery (Souza, 2020). As a federal republic with a presidential system, its 27 federative units operate with autonomy, as delineated by the Constitution of the Federal Republic of Brazil (1988).

Each state and the Federal District have elected legislative and executive branches, along with an independent judiciary (Haddad *et al.*, 2017). Brazil's more than 5,500 municipalities exercise financial and legislative autonomy in local governance of education, healthcare, and urban

planning, constrained by the authority of state and federal governments (Garson & Castro, 2024). The nation is divided into five regions for statistical purposes (Souza, 2020). Government funds are allocated, with more than one-third distributed to states and municipalities, while the federal government oversees defence, social security, and infrastructure (Bandeira *et al.*, 2016). Figure 6.4 provides a visual representation of Brazil's administrative structure.

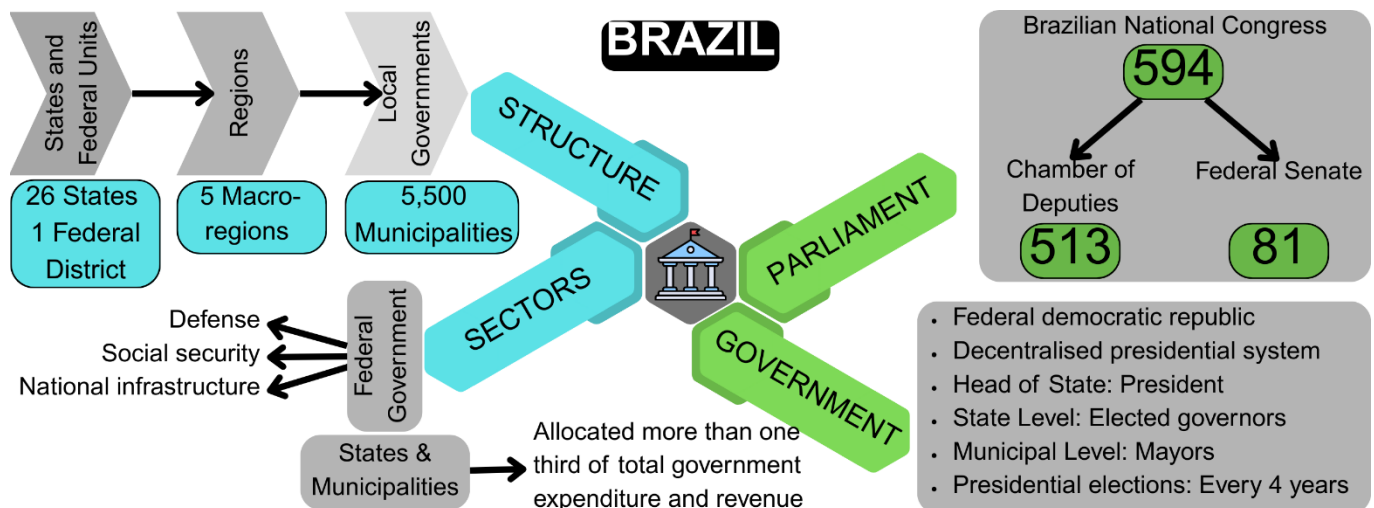


Figure 6.4: Administrative Structure of Brazil

Source: Own construction, based on Souza (2020) and de Oliveira (2023)

6.2.3 Planning Structure

Brazil's urban planning framework is grounded in federal legislation and the country's democratic and constitutional progress. It provides guidelines for municipal planning and development in this rapidly urbanising country, marking a significant milestone in urban policy. This framework is organised within a three-tier legislative hierarchy:

- (i) **Federal Government:** The federal government's responsibilities include establishing national standards, guidelines and legislation (Farret, 2001). It ensures constitutional adherence, promotes coordination at both national and international levels, provides financial and technical assistance, and develops sectoral policies and programmes (Lima *et al.*, 2021).
- (ii) **State Government:** Through regional coordination, state legal frameworks include specific planning statutes and state constitutions (Ferreira & Gonçalves, 2023). State government responsibilities in planning include ensuring inter-municipal coordination, supervising environmental licensing, managing metropolitan area planning, and developing regional policies (Bercovici, 2022).

- (iii) *Municipal Government*: Municipalities have primary responsibility for implementation, with their constitutional status recognising them as federal entities (Lima *et al.*, 2021). Their responsibilities include facilitating local participatory processes, managing development control and permits, establishing zoning laws and building codes, and developing and implementing master plans (Ferreira & Gonçalves, 2023).

6.2.4 Planning Legislation

Since 1988, Brazil's planning legislation has developed significantly. The primary legislative framework for urban planning in Brazil is grounded in the groundbreaking *Constitution of the Federal Republic of Brazil* (1988) and the forward-thinking '*Estatuto da Cidade*' (*City Statute*) of 2001, promulgated as Federal Law 10.257:

- (i) *Constitution of the Federal Republic of Brazil* (1988).

Articles 182 and 183 of the *Constitution* (1988) established a dedicated chapter on Urban Policy, and the *City Statute* of 2001 was explicitly enacted to regulate it. The *Constitution* (1988) introduced the principle that cities and urban property must serve a social purpose, marking a significant shift away from traditional property rights frameworks in Brazilian law (Santana, 2019). It facilitated a transition towards more participatory planning practices by mandating public participation in planning decisions, exemplified by the holding of public hearings to incorporate local input (Caldeira & Holston, 2015). Such transparency is essential, as it ensures that planning decisions align with the public's needs. The *Constitution* (1988) granted municipalities greater autonomy and recognised their status as federal entities, assigning them primary responsibility for implementing urban policy. This shift aimed to empower municipalities to address urban planning challenges sustainably and effectively (Oliveira, 2022). Furthermore, the *Constitution* (1988) mandated the integration of policies across various planning sectors to achieve broader sustainable development objectives (Santana, 2019). Following the enactment of the *Constitution* (1988), an extensive period of legislative debate and negotiation spanning over a decade culminated in the development of the *City Statute* (2001) (Caldeira & Holston, 2015).

- (ii) *City Statute ('Estatuto da Cidade')* (10.257 of 2001).

The *City Statute* (2001) is Brazil's principal legislative instrument for urban planning, enacted after thirteen years of political negotiations following the adoption of the *Constitution* (1988). It authorises municipalities to develop local planning legislation, ensuring that planning is conducted within a framework tailored to the specific needs of each urban area (Goulart *et al.*, 2016). The statute introduces Special Zones of Social Interest to foster inclusive development within zoning

plans (Goulart *et al.*, 2016). Furthermore, the *City Statute* (2001) encourages municipalities to formulate master plans to guide development within their jurisdictions (Benso *et al.*, 2023). It mandates the implementation of mechanisms such as Neighbourhood Impact Studies to evaluate the potential effects of development on surrounding areas (Matoso & Ferreira, 2018). Additionally, the *City Statute* (2001) legally recognises and protects informal settlements as integral to urban development (Augusto & Calissi, 2022). It offers a conceptual framework for analysing the social functions of property and environments to harmonise property rights with public interests (Alfonsin *et al.*, 2023). Although the *City Statute* (2001) introduced innovative urban mechanisms to promote equitable development, socio-spatial segregation persists due to inadequate enforcement (Pereira, 2004). Moreover, it established a democratic administrative framework that emphasises processes conducive to participatory urban governance. The *City Statute* (2001) also encompasses mechanisms for regularisation as legal tools to formalise informal settlements. The creation of a unified federal framework integrates constitutional rights related to the urban environment with the autonomy municipalities enjoy in urban planning.

(iii) *Metropolis Statute ('Estatuto da Metrópole')* (13.089 of 2015).

The *Metropolis Statute* (2015) addresses the complex nature of planning and governing metropolitan municipalities in Brazil. It aims to fill gaps in the legal framework governing metropolitan regions and to coordinate policies across sectors (Santos & Vasques, 2015). To guide metro development, the *Metropolis Statute* (2015) requires each municipality to create integrated urban development plans (Levin, 2020). However, some metropolitan areas have yet to develop their integrated plans, which hampers effective management, as in Vale do Paraíba and Litoral Norte (Toledo *et al.*, 2024). Competition among municipalities makes implementing the *Metropolis Statute* (2015) challenging. Additionally, a lack of funding for metropolitan development projects further impairs the statute's effectiveness, resurfacing urban infrastructure issues (Santos & Vasques, 2015). The *Metropolis Statute* (2015) requires municipalities to align their development plans with those of metropolitan regions, potentially diminishing municipal autonomy (Levin, 2020).

6.2.5 Spatial Planning

- **Strategic Planning: Policy Framework**

The framework for planning policies in Brazil is delineated as follows:

(i) *National Regional Development Policy (PNDR)* of 2003.

The *PNDR* of 2003 was formulated to enhance regional development by coordinating various government initiatives within a framework (Karam, 2012). Nevertheless, the policy failed to support emerging development dynamics because it lacked a consistent regional framework, resulting in limited success in achieving its objectives (Silva, 2016). Furthermore, financial constraints hindered the effective implementation of the *PNDR* of 2003, as budget allocations from the Ministry of Development and Integration did not align with the policy's objectives (Gumiero, 2023). Implementation was further impeded by ineffective actions and the lack of a unified agenda, thereby diminishing the potential impact of available resources (Karam, 2012). The *PNDR* of 2003 established regional forums to improve project management and stimulate local engagement, providing a platform for decision-making and for regional stakeholders to promote development initiatives (Zanon, 2023). The policy also sought to encourage public participation and consensus-building while emphasising the development of rural territories (Boziki *et al.*, 2019). Ultimately, the policy aimed to reduce regional disparities by applying neo-institutional theoretical frameworks (Barbosa, 2013).

(ii) *National Urban Development Policy* (PNDU) of 2005.

The *PNDU* of 2005 marks substantial progress in addressing Brazil's urbanisation challenges. To ensure that Brazil's urban policies align with international development objectives, the *PNDU* of 2005 incorporates principles from global urban development frameworks, including the *2030 Agenda for Sustainable Development* and the *New Urban Agenda* of 2016 (Kinyanjui, 2020). Furthermore, the policy seeks to balance social, economic, and environmental considerations to foster sustainable development. It also aims to enhance land-use efficiency, improve public transport, and address urban sprawl. Effective resource allocation among government entities requires the integration and coordination of federal, state, and municipal authorities (Rezende, 2022). The *PNDU* of 2005 advocates private capital investment in urban planning, recognising limited access to funding as a primary obstacle to policy implementation (Rezende, 2022). The *Urban Development Policy* of 2005 was supported by the *City Statute* of 2001 (Tonella, 2013). Participatory budgeting processes and public consultations were instrumental in fostering greater public engagement in planning decisions, aligning with key objectives of the *PNDU* of 2005 (Tonella, 2013). In line with other housing policies, this initiative aimed to alleviate housing shortages and promote spatial equity, particularly by improving living conditions for economically disadvantaged communities in urban areas. Additionally, the policy sought to mitigate pollution and traffic congestion by upgrading urban transport systems to reduce dependence on private vehicles (Kinyanjui, 2020).

(iii) *Growth Acceleration Program* (PAC) of 2007.

The *PAC* of 2007 aimed to foster economic development through substantial infrastructure investments. The programme targeted sectors such as sanitation, housing, energy, transportation, and urban development (Rotta & Reis, 2019). By directing resources to these critical areas, the *PAC* of 2007 sought to meet escalating demand for urban services. Consequently, such investments were expected to stimulate economic growth, necessitating regulatory and institutional innovations to expedite priority projects. However, by the end of 2012, 86% of sanitation initiatives had been halted, revealing delays in implementation (Rodrigues *et al.*, 2018). This was primarily attributed to corruption and mismanagement of funds by various municipalities (Rodrigues *et al.*, 2018). Regarding private-sector participation, elevated costs and complex taxation impeded the expansion of such investments. Furthermore, the *PAC* of 2007 played an integral role in revitalising government investment in infrastructure. Nonetheless, the programme frequently exacerbated disparities rather than effectively mitigating inequalities and transforming regional dynamics (Carmo *et al.*, 2019). Nevertheless, successful implementation in regions such as Amapá enhanced strategic regional planning, with a particular emphasis on infrastructure development for transportation and energy projects (Carmo *et al.*, 2019).

(iv) *My House, My Life Programme (MCMV)* of 2009.

The *MCMV* of 2009 is Brazil's most extensive housing initiative, designed to mitigate the housing deficit and provide affordable housing for low-income communities. By providing low-interest financing to the construction sector, the *MCMV* of 2009 aims to deliver millions of houses to underserved populations (Eskes & Vieira, 2016). Under special financial conditions, the programme enabled families to acquire homes at minimal cost (Soares, 2013). Consequently, urban landscapes were significantly transformed by the development of new neighbourhoods characterised by similar housing units, predominantly located on the urban peripheries. As a result, medium-sized cities and capital cities across Brazil have experienced a reorganisation of spatial arrangements. Nonetheless, in cities such as Belém and Manaus, the programme contributed to spatial fragmentation, thereby exacerbating socio-economic disparities. Moreover, placing low-income housing on the outskirts of urban areas has heightened urban segregation (Pessôa, 2019). Given that the primary objective of the *MCMV* of 2009 was to maximise housing production within limited timeframes, the quality of the housing units was frequently compromised, potentially leading to issues related to residents' quality of life and health (Da Silva & Tourinho, 2018).

(v) *National Urban Mobility Policy (PNMU)* of 2012.

Supported by *Law 12,587*, the *PNMU* of 2012 aims to enhance access to goods and people by integrating diverse modes of transport. Therefore, municipalities with a population exceeding

20000 residents must develop an Urban Mobility Plan to qualify for funding for transport infrastructure development. However, there are no standardised measures to assess compliance with the *PNMU* of 2012 standards for Urban Mobility Plans (Mondini & Rossetto, 2017). With a focus on 'the right to the city', the *PNMU* of 2012 seeks to enhance access to urban spaces for all residents, thereby promoting equitable urban environments (Feltran, 2016). The priority is to improve public transport and non-motorised modes to reduce the adverse effects of reliance on private vehicles (Fochesatto *et al.*, 2023). However, most urban residents prefer to use private vehicles, and this mode of transport continues to dominate infrastructure and urban development (Rodrigues, 2022). Despite the policy's intentions, most municipalities have not yet embraced the benefits of sustainable mobility, as political and financial constraints hinder its implementation (Rodrigues, 2022).

- **Statutory Planning: Development Control**

The statute mandates that all major urban projects undergo environmental impact assessments and social impact evaluations (Alfonsin *et al.*, 2023). Additionally, to regulate development in Brazil, the following control mechanisms are being implemented:

- (i) *Metropolitan Statutory Plan.*

The metropolitan statutory plan is required under the *Metropolis Statute* (2015) for each metro municipality. This statutory plan serves as a legal framework for metropolitan areas and addresses the complexities of economic concentration in city centres. It aims to improve cooperation among municipalities and states by addressing the historically competitive strategies that characterised inter-municipal relationships (Santos & Vasques, 2015). Therefore, it encourages municipalities to work together on shared urban issues, thereby creating an interpenetrative governance system (Rodrigues *et al.*, 2018). However, a significant obstacle to metropolitan planning is the lack of uniform treatment of metropolitan issues across regions (Bruno, 2015).

- (ii) *Integrated Urban Development Plan.*

An integrated urban development plan is an essential component of the metropolitan statutory plan, designed to align urban policies across sectors and municipal areas. In essence, it seeks to unify planning paradigms across jurisdictions while maintaining a hierarchical superiority over municipal plans (Bonizzato, 2015). The objective of this plan is to foster sustainable development by integrating multiple sectors and addressing common urban planning challenges (Rodrigues *et al.*, 2018). Nevertheless, the effective implementation of such plans requires cooperation and funding, which have not been sufficiently provided, thereby constraining their efficacy (Santos &

Vasques, 2015). Furthermore, numerous metropolitan regions face difficulties in formulating and implementing their integrated urban development plans, including Vale do Paraíba and Litoral Norte (Toledo *et al.*, 2024).

(iii) *Municipal Master Plan.*

Municipal master plans are the primary legal tool for directing urban development within each municipality, as required by the *City Statute* (2001) (Garcez & Carmello, 2018). Developing a master plan is essential for metropolitan regions, tourist destinations, and cities, particularly those with populations over 20,000 (Moreira & Terbeck, 2015). During the formulation of a master plan, community involvement must be an integral part of a participative process (Garcez & Carmello, 2018). These plans must be reviewed at least once per decade. Master plans should be formulated in line with regional policies and sectoral strategies. Economic development policies, social housing strategies, environmental protection measures, transportation and infrastructure planning, and land-use zoning and development parameters constitute essential content requirements for master plans (Buba, 2019).

(iv) *Zoning Laws.*

In Brazil, zoning regulations are the primary instrument for land-use governance (Faria, 2011). Each municipality's master plan serves as a blueprint for development and ensures that land use aligns with strategic objectives. Consequently, zoning regulations are integrated into municipal master plans (de Vincenzi, 2024). These regulations aim to address issues of inequality; therefore, in Brazil, designated special zones include ZEIS (Special Social Interest Zones), selected for social housing initiatives, and ZEPA (Special Environmental Protection Areas), established for environmental conservation. Additionally, other specialised zones encompass heritage zones, dedicated to the preservation of sites of historical or cultural significance, and innovation zones, intended to foster economic development (da Costa & Antonello, 2021). Usually, the effectiveness of zoning regulations is weakened by informal settlements and poor infrastructure; therefore, it is crucial to adopt inclusive, flexible zoning rules that meet local needs and provide access for all residents (Vincenzi, 2024).

Figure 6.5 shows the planning framework for Brazil.

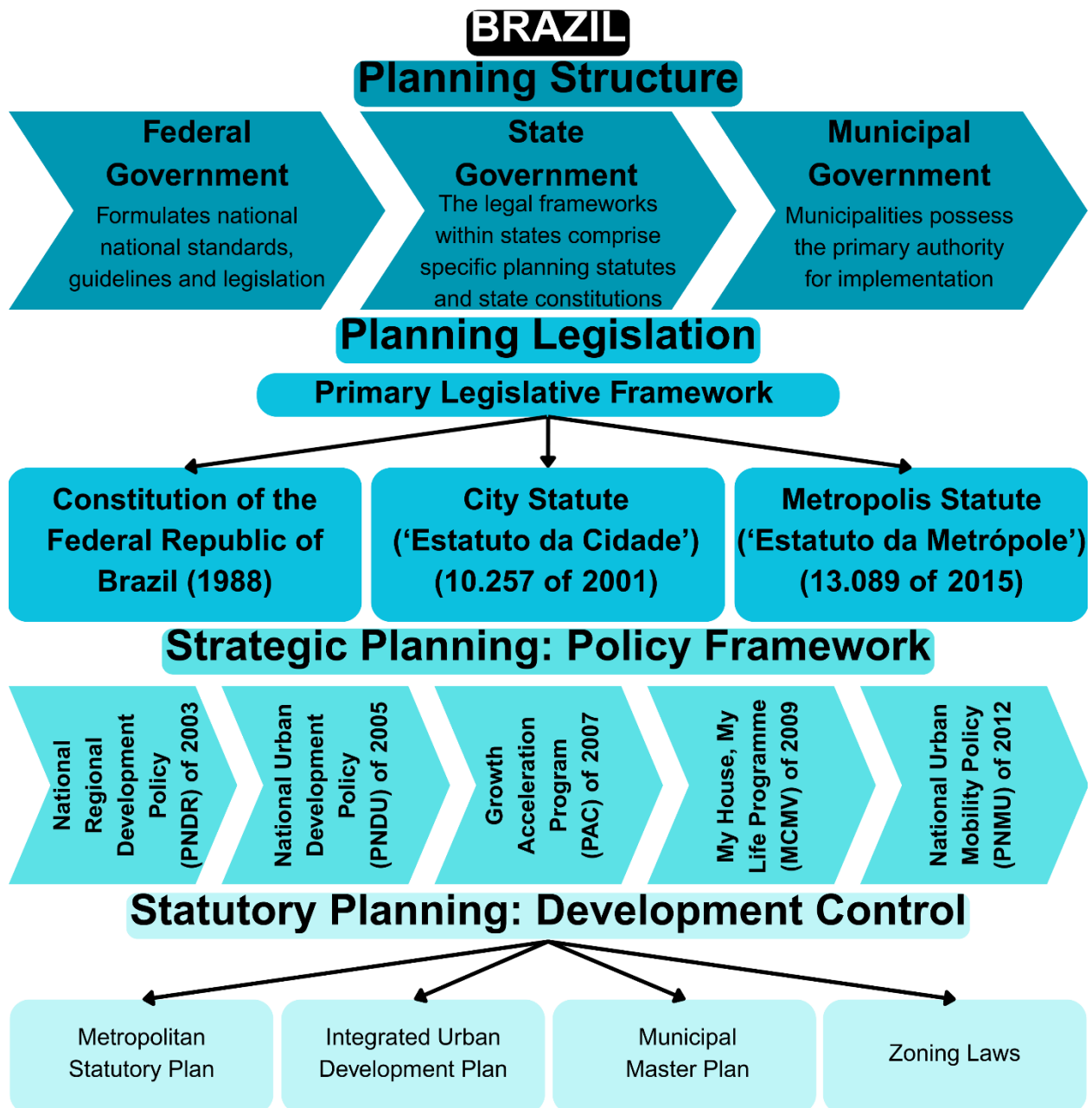


Figure 6.5: Planning Framework of Brazil

Source: Own construction, based on the *Constitution of the Federal Republic of Brazil* (1988) and the *'Estatuto da Cidade' (City Statute)* (2001)

6.2.6 Implementation and Challenges

Environmental, social, political, and economic factors contribute to the challenges Brazil faces in implementing its planning practices. Deforestation in the Amazon impairs Brazil's ability to fulfil its commitments to mitigate the adverse effects of climate change. Deforestation is often driven by prioritising economic growth over environmental sustainability (Mathias, 2024). A zoning mechanism known as the EEZ (Economic Ecological Zones) seeks to minimise this issue in the

Amazon; however, it faces difficulties in effectively addressing social and economic deficiencies and environmental pressures. Moreover, escalating demand for financial and energy production from natural resources obstructs sustainable territorial development (Moskalev, 2022).

Social and economic inequalities that lead to spatial segregation in areas such as Salvador contribute to the expansion of 'favelas' (slums). Residents' expectations and institutional objectives are misaligned, making the effective implementation of planning practices complex (Zhang, 2024). This issue necessitates enhanced public participation. Historically, housing and urban policies were segregated; therefore, integrating Social Housing Zones poses challenges due to the resulting lack of institutional capacity in these sectors (Pequeno & Freitas, 2012).

Initiatives to improve conditions in rural regions of Brazil, particularly in the Amazon, face obstacles stemming from limited social capital, cultural heterogeneity, and economic disparities. These challenges also give rise to conflicts that threaten participatory planning and collective resource management (Frederico *et al.*, 2013). Advancing rural areas requires the involvement of transitional organisations to facilitate strategic planning and encourage public participation. Moreover, the preference for transferring controlled funds rather than implementing rural development contracts complicates efforts to advance rural development (Beduschi & Abramovay, 2004).

6.3 India

6.3.1 General Country Information

India, located in South Asia, is bordered by the Indian Ocean, the Arabian Sea, and the Bay of Bengal. It shares land borders with Pakistan, China, Nepal, Bhutan, Bangladesh, and Myanmar, and has islands near Thailand and Indonesia (Das, 2012). Spanning 3,287,263 square kilometres (Kedar, 2015), India is the seventh-largest country in the world (Kedar, 2015). It is also the most populous country, with a population of 1,464,544,553 individuals (World Bank, 2023) and a population density of 445 individuals per square kilometre. The administrative divisions include 28 states and eight union territories, among which the capital city, Delhi, and the highly populated Mumbai are notable (Taylor & Shrimankar, 2024). The level of urbanisation stands at 40%, indicating a relatively modest rate (World Bank, 2023). The expansion of urban areas threatens arable land, with projections suggesting a 5–10% conversion of agricultural land by 2030 (Deininger *et al.*, 2016).

The reduction in food security can be linked to uncultivated land in regions such as Rajasthan and Bihar (Pandey & Ranganathan, 2018), despite the existence of over 47 million hectares of

wastelands suitable for biomass cultivation (Ostwald *et al.*, 2015). India, with a gross domestic product of 4.0 trillion USD, is ranked the fifth-largest economy globally (World Bank, 2023). This position is primarily driven by growth in the services sector, information technology exports, and digital advances (Khan, 2020). Although the agricultural sector employs a significant portion of the population, its contribution to GDP has diminished (World Bank, 2023). The poverty rate has fallen to 5.3%, accompanied by a moderate inequality coefficient of 0.340 and a Human Development Index (HDI) of 0.685 (World Bank, 2023). Figure 6.6 presents a locality map and general country information for India.

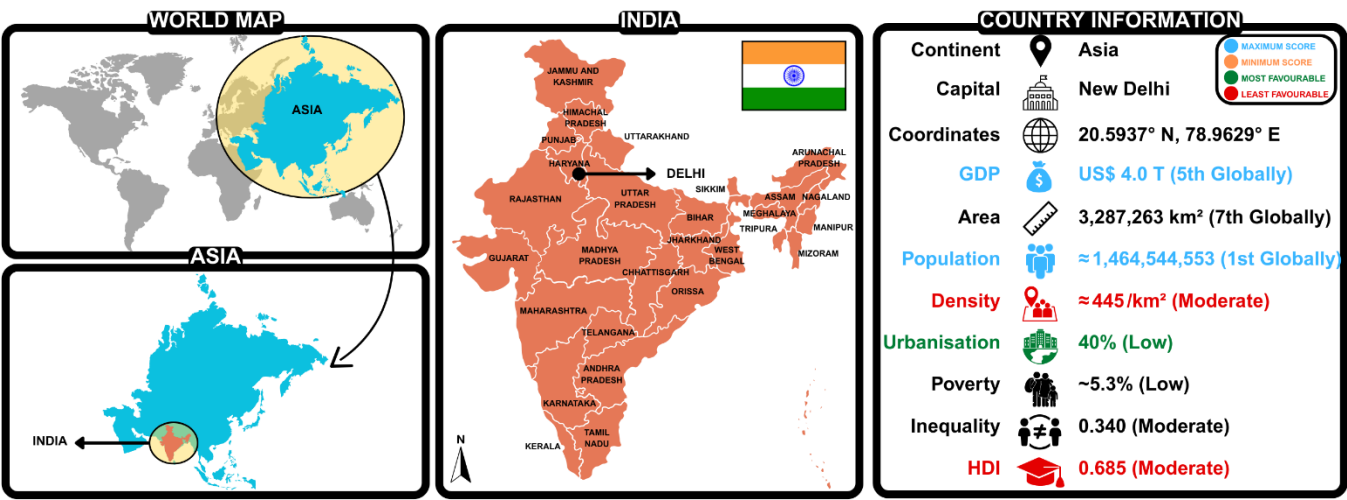


Figure 6.6: Locality Map and General Country Information of India

Source: Own construction, based on World Bank (2023)

6.3.2 Administrative Structure

India's administrative framework is a complex system that seeks to balance the requirements of a democratic parliamentary system within a federal republic (Yang, 2023). The federal structure allocates authority between the central government and the individual states, reflecting the nation's linguistic, religious, and cultural diversity (Singh, 2017). The bicameral Parliament of India comprises the 'Lok Sabha' with 543 members and the 'Rajya Sabha' with 245 members, for a total of 788 legislators (Li, 2023). The executive branch, led by the President, includes the Prime Minister and the Council of Ministers, which are responsible for policy development and execution. The President is elected every five years by an electoral college comprising members of both Houses of Parliament and state assemblies (Kumar, 2024).

State governments share a similar structure, with Chief Ministers and ceremonial Governors appointed by the central government. India's 28 states and eight union territories each maintain their own administrative frameworks (Taylor & Shrimankar, 2024). The system includes tribunals

and agencies that are fundamental to conflict resolution and justice administration. Ongoing reforms aim to enhance governance efficiency and address bureaucratic inertia (Shmelev, 2023). The central government manages funding for defence, infrastructure, and welfare programmes, while state governments finance education, healthcare, and agriculture (Thomas, 2021). India's decentralised governance system includes over 4,700 urban municipalities and more than 250,000 'Panchayati Raj' institutions (Taylor & Shrimankar, 2024). These municipal entities are responsible for services such as water supply, sanitation, waste management, infrastructure development, and urban planning, all under the supervision of the respective states. Figure 6.7 provides a visual representation of India's administrative structure.

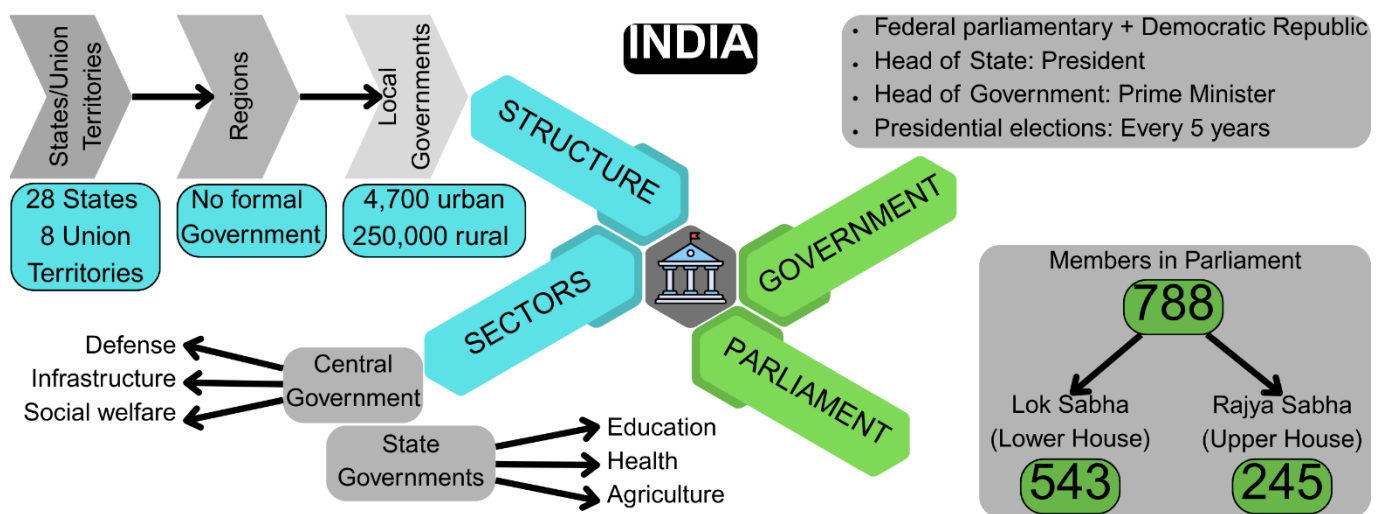


Figure 6.7: Administrative Structure of India

Source: Own construction, based on Singh (2017) and Shmelev (2023)

6.3.3 Planning Structure

Public health considerations were the primary influence on India's planning legislation during the colonial era (Graveley, 2022). This decentralised framework is rooted in India's constitutional structure, which authorises each state to formulate its own planning statutes while complying with national model acts and standards. As a result, India's planning legislative system operates within a three-tier hierarchy:

- (i) **Central Government:** Entrusted with the formulation of national urban policies and guidelines, the decentralised framework constrains the central government's direct constitutional role (Nayar, 2012). The central government develops sector-specific programmes, such as projects to construct and enhance infrastructure and to foster development in specific regions. The Land Acquisition, Rehabilitation, and Resettlement Act of 2013 establishes a regulatory framework, overseen by the central government, to

supervise land acquisition procedures and associated environmental considerations. It encompasses legislative measures designed to protect the environment and conserve natural resources, thereby mitigating ecological impact (Graveley, 2022). Furthermore, the central government bears responsibility for facilitating effective collaboration and communication on interstate and international issues.

- (ii) *State Government*: The Seventh Schedule of the *Constitution of India* (1950) sets out the constitutional basis for India's planning system. In this context, urban planning is listed under the State List (Entry 18), giving states exclusive authority over planning matters. State governments have the legislative power and responsibility to create and enforce Town and Country Planning (TCP) Acts within their jurisdictions (Sudhira *et al.*, 2007). They can also approve and modify master plans prepared by local government bodies. Additionally, they establish mechanisms to supervise development, ensuring that land use and development activities are sustainable, safe, and in line with community planning objectives (Desmet *et al.*, 2015). Ultimately, an institutional framework comprising development authorities and planning boards is established to plan, manage, and implement development activities and policies (Sudhira *et al.*, 2007).
- (iii) *Municipal Government*: The constitutional framework encompasses elements such as the *74th Amendment Act* (1992), although its implementation remains inadequate. The *74th Amendment Act* (1992) is significant in urban planning because it sought to empower local governments by increasing their planning authority. Their planning responsibilities include developing schemes and local area plans. Furthermore, municipalities possess the authority to approve development projects and issue building permits (Sudhira *et al.*, 2007). This power ensures that development activities comply with local laws, regulations, and building codes, thereby upholding safety and zoning standards (Nallathiga, 2015). Additionally, local governments are tasked with providing municipal services and constructing infrastructure within their jurisdictions (Mohanty, 2022). Ultimately, local governments must maintain democratic accountability that reflects residents' interests, ensuring transparency, responsiveness, and alignment with public expectations and needs.

6.3.4 Planning Legislation

India's complex legislative planning framework has evolved over more than a century. The Indian planning system is characterised by the autonomy granted to individual states in crafting planning laws, in contrast to the centralised planning legislation adopted by many other countries (Datta & Sodhi, 2020).

(i) *Constitutional 74th Amendment Act (1992).*

The *Constitutional 74th Amendment Act (1992)* underpins urban planning in India and is recognised as the most transformative legislation in the country's history. Urban Local Bodies (ULBs) are formally recognised and established within the constitutional framework, thereby conferring official authority and legitimacy through provisions that delineate their roles, duties, and functions, as outlined in the country's highest legal document (Prasad & Pardhasaradhi, 2020). The *74th Amendment (1992)* accordingly empowers municipalities to formulate plans to foster economic growth and social justice (Sahoo, 2024). The election of municipal governments with planning responsibilities indicates a shift towards decentralising authority from the central government, ensuring that elected officials at the municipal level have direct responsibility and authority over planning and decision-making. Nevertheless, under the Seventh Schedule of the *Constitution of India (1950)*, urban planning remains a state subject; thus, decisions and policies related to urban development, infrastructure, zoning, and related domains are predominantly managed at the state level (Sudhira *et al.*, 2007). Despite the stipulations of the *74th Amendment (1992)*, which intended to delegate the responsibility of drafting master plans to elected municipal governments, this task continues to fall within the jurisdiction of planning authorities as specified by the Town and Country Planning (TCP) Acts.

(ii) *Model Town and Country Planning Act of 1957.*

In 1957, the Institute of Town Planners India formulated the *Model Town Planning Act of 1957*, recognising the need for comprehensive, modern planning legislation (Idiculla, 2023). Rather than adopting a single, overarching planning statute, India maintains a decentralised system in which the *Model Town and Country Planning Act of 1960* serves as the foundational framework for the Town and Country Planning (TCP) Acts enacted by individual states (Maheshwari, 2024). The *Model Act (1957)* is the closest equivalent to a 'primary planning act' in India, providing states with a fundamental basis for developing their planning legislation. The provisions introduced by the *Model Act (1957)* are significant, encompassing the establishment of planning authorities, the delineation of local planning regions, and the creation of state-level town planning boards (Morris & Pandey, 2010). Its objective is to facilitate organised development in urban and rural areas, prevent unregulated land development, safeguard and improve existing recreational amenities, and support infrastructure to promote the systematic growth of the commercial and industrial sectors (Idiculla, 2023).

Each of the twenty-eight states in India has enacted its own Town and Country Planning Act, creating a diverse legislative landscape (Maheshwari, 2024). These Acts are based on model

legislation provided by the central government. Several State Town and Country Planning (TCP) Acts include:

(i) *Development Act of 1957 for Delhi.*

Delhi, the national capital of India, has a distinct set of legislative measures despite not being classified as a state. The Delhi Development Authority (DDA) is responsible for comprehensive planning of urban development and infrastructure projects within Delhi (Chattopadhyay *et al.*, 2014). Furthermore, statutory master plans for the city's expansion are formulated under this legislation (Chattopadhyay *et al.*, 2014). This legislation delineates the city's authority over land management, particularly in land acquisition and development. The legislation was enacted to address the need to manage rapid population growth and urbanisation, which place significant pressure on infrastructure and services (Chattopadhyay *et al.*, 2014). Consequently, its primary objective is to prevent unlawful and disorderly development that could cause environmental damage and jeopardise Delhi's sustainable future. Nonetheless, informal settlements have persisted because of this growth (Dutta & Punia, 2025). Rapid urban expansion, exemplified by Delhi, often leads to housing challenges; therefore, this legislation was deemed essential to address these issues and improve residents' quality of life (Baig & Sarwar, 2024).

(ii) *Town and Country Planning Act of 1961 for Karnataka.*

This legislation holds significant historical importance as one of India's earliest comprehensive planning statutes. It seeks to address urban sprawl, spatial inequality, and rapid urbanisation, particularly in cities such as Bangalore (Sudhira & Ramachandra, 2009). Rapid urbanisation increases land and housing costs and drives unplanned outward expansion of cities (Venkataraman, 2013). Furthermore, given that most of the state's population is concentrated in Bangalore, the most urbanised region, the state confronts challenges related to uneven regional development. Accordingly, this legislation aims to promote balanced growth, with development more equitably distributed throughout the entire state (Eswar & Roy, 2018). Legally, municipalities are mandated to formulate master plans within a comprehensive master plan framework to outline development (Bell *et al.*, 2024). Essential instruments for development regulation include building codes and zoning policies. Furthermore, when conflicts arise over planning decisions, the legislation provides mechanisms such as planning appeals and tribunals to resolve such disputes (*Town and Country Planning Act of 1961*).

(iii) *Regional and Town Planning Act of 1966 for Maharashtra.*

This act establishes a comprehensive framework and is among India's most detailed pieces of planning legislation. It emphasises regional planning and provides guidelines for the structured development of both regional and metropolitan areas (Patil, 2024). Transferable Development Rights (TDR) is a mechanism under this act that allows landowners to transfer development potential from one location to another, thereby supporting public infrastructure projects. However, the success of TDR outside metropolitan regions has been limited. Nonetheless, the mechanism is intended to reduce the financial burden of municipal land acquisition for public use (Boob, 2013). For development regulation, the state enforces detailed guidelines, including land use and development plans within its jurisdiction (Meshram, 2011). Furthermore, competent and empowered development authorities, operating within a robust institutional framework, promote coordinated efforts, effective governance, and superior outcomes. Regions such as Marathwada exemplify regional disparities, as development initiatives in these areas lag (Pandkar, 2023). However, the act continues to strive towards improving connectivity between urban and rural regions to ensure balanced regional development (Wanmali, 1970).

(iv) *Urban Planning and Development Act of 1973 for Uttar Pradesh.*

This legislation concerns the Indian state with the largest population. Its implementation reflects the rapid urbanisation experienced by this state at that time (Patel & Shukla, 2023). Consequently, one of the primary objectives of this legislation is to ensure adequate development of housing and infrastructure to support the expanding population (Anjum & Singh, 2024). To facilitate comprehensive implementation across the entire state, specialised planning agencies have been established, supported by development authorities (Singh *et al.*, 2025). Furthermore, the legislation delineates the authority for land acquisition within the framework of planned development (Mohanty, 2022). Additionally, it mandates the enactment of provisions to guarantee community participation in planning decisions (*Urban Planning and Development Act of 1973*).

(v) *Other States.*

Each of the remaining states has enacted planning legislation tailored to the specific conditions within its jurisdiction (Maheshwari, 2024). Standard features include comprehensive planning, regulatory control over zoning, and oversight of development activities. These variations highlight distinct administrative practices and regional priorities. It is important to note that certain states, such as Chandigarh, Rajasthan, and Haryana, have not yet fully developed TCP Acts (Morris & Pandey, 2010). Instead, these states operate under different legislative frameworks; Chandigarh follows the Capital of Punjab *Development and Regulation Act* of 1952, while Rajasthan and Haryana have been developing extensive TCP legislation in recent years.

6.3.5 Spatial Planning

- **Strategic Planning: Policy Framework**

The planning system establishes a hierarchical framework in which the State Town Planning Board advises the government on planning authorities and policies (Graveley, 2022). It facilitates the development and implementation of plans by local planning authorities and oversees routine planning enforcement and applications. India's planning policy framework is organised accordingly:

(i) *National Land Use Policy* of 2013.

Designed to address the country's diverse challenges, the policy advocates the development of inclusive and sustainable urban centres across India. Challenges such as urban sprawl contribute to the loss of open spaces and agricultural land, often resulting in unplanned expansion (Choudhury *et al.*, 2024). When agricultural land is repurposed for new developments, it can threaten the livelihoods of rural populations and raise concerns about food security (Vyas, 2023). Moreover, the policy seeks to safeguard land with high agricultural value and promotes the use of non-agricultural land for development, aiming to enhance agricultural productivity (Kiesecker *et al.*, 2019). Given India's ambitious renewable energy goals, it is vital to ensure the careful use of land to support energy infrastructure (Kiesecker *et al.*, 2019). Consequently, the policy aspires to advance environmental sustainability, social equity, and economic growth, while concurrently addressing poverty alleviation, fostering effective governance, and prioritising infrastructure development. Implementation of this policy is entrusted to state and local governments (Choudhury *et al.*, 2024).

(ii) *National Institution for Transforming India (NITI Aayog)* of 2015.

India's premier policy think tank, *NITI Aayog* (2015), was established to promote cooperative federalism and economic progress by providing strategic guidance to both the federal and state governments (Ciumasu, 2022). *NITI Aayog* (2015) functions as a centre for information dissemination and innovation, encouraging cooperative federalism that involves states in policymaking, thereby supporting a decentralised approach compared with the Planning Commission (Graveley, 2022). It employs a ranking system to assess states' progress towards the SDGs, thereby fostering competition and a desire for sustainable development improvement (Jain & Mishra, 2019).

(iii) *Atal Mission for Rejuvenation and Urban Transformation (AMRUT)* of 2015.

This policy primarily focuses on developing and enhancing infrastructure, including urban transport, sewage management, and water supply systems. To meet the needs of a growing population, the initiative shifts its emphasis towards sustainable and resilient infrastructure (Kamthe *et al.*, 2025). For instance, integrating technology and smart initiatives into service delivery may promote further development (Bhatt & Roychoudhury, 2023). *AMRUT* (2015) has significantly improved urban water sources, as demonstrated in Uttar Pradesh, where water connections increased by 48% and sewerage coverage expanded by 29% within five years (Singh *et al.*, 2025). Additionally, the reforms aim to enhance governance and service delivery (Singh *et al.*, 2025). Therefore, the initiative provides technical assistance to strengthen institutional capacity and effectiveness. Ongoing monitoring assesses performance, and strategies are adjusted based on the outcomes achieved (Roy, 2023). This highlights a focus on achieving specific, measurable results and ensuring that all activities align with these objectives. Furthermore, performance evaluation supports informed decision-making to refine strategic approaches (Kamthe *et al.*, 2025).

(iv) *Smart Cities Mission* of 2015.

This policy underscores the integration of planning and technology to deliver digital services and infrastructure. It incorporates technology-driven solutions to address urban challenges. It also advocates public participation in planning decisions through technological means. Special Purpose Vehicles (SPVs) have been established to manage these smart city projects and to bypass local governance, with 100 SPVs specifically created (Kumar & Chaudhary, 2017). The rapid deployment of Smart Operation Centres (SOCs) to support innovative development has led to fragmented technological implementations that have proven inadequate for this transformation (Prahara, 2025). The selection process for cities designated for smart city development is merit-based and remains highly competitive. Funding for smart city initiatives is provided by the central government, with additional contributions from local authorities. However, as India's population continues to grow rapidly, this mission faces funding challenges despite substantial financial support from the World Bank (Angrish, 2023).

(v) *National Urban Policy Framework (NUPF)* of 2018.

The objective is to develop cities that are resilient to climate change by fostering urban areas characterised by inclusion, connectivity, integration, and compactness (Kinyanjui, 2020). These strategies are employed to address the challenges of rapid urbanisation (Kundu, 2020). The *NUPF* (2018) aims to reduce urban concentration in metropolitan cities by promoting the growth of smaller towns and ensuring equitable access to services and resources (Kundu, 2020). The framework consolidates prior missions and programmes to establish a cohesive policy

environment (Kundu, 2020). Emphasising sustainable urbanisation, the *NUPF* (2018) aligns its initiatives with the *Sustainable Development Agenda* (2015) and the *New Urban Agenda* (2016) (Kinyanjui, 2020). Consequently, the *NUPF* (2018) endorses the *Smart Cities Mission* (2015) to revitalise cities through innovative approaches.

- **Statutory Planning: Development Control**

The regulation of development encompasses establishing legal frameworks to oversee urban expansion and facilitate infrastructure development. This process includes issuing planning licences, enforcing planning legislation, and regulating land use and development activities. The development control mechanisms employed in India include:

- (i) *Regional Plans.*

Regional plans are formulated in accordance with the Town and Country Planning Acts, the Town and Country Planning Organisation, and the Urban and Regional Development Plans Formulation and Implementation Guidelines (Shaikh & Sonar, 2021). These plans emphasise regional planning and the coordination of activities across municipal boundaries. Regional plans define specific economic zones to promote industrial growth and export activities. However, the complexity of mapping and zoning within regional plans does not always adequately accommodate urban expansion (Mishra, 2005). The unequal growth observed across India, with advanced development in states like Punjab, underscores the nation's regional disparities and highlights the need for comprehensive regional development plans (Mittal & Byahut, 2014). Furthermore, environmental planning is integrated to safeguard natural resources and ecosystems. Ultimately, these plans aim to synchronise regional infrastructure and transport (Shaikh & Sonar, 2021).

- (ii) *Master Plans.*

The concept of a master plan is a fundamental part of Indian planning legislation. Master plans are required for urban areas exceeding a certain population threshold to ensure the provision of civic infrastructure, oversee development projects, and allocate land for various uses (Nallathiga, 2015). Examples of cities with master plans in India include Kochi, Mirzapur, and Alwar (Noor, 2022). These master plans are designed to cover a period of twenty to twenty-five years and must be reviewed and revised every decade, in accordance with state Town and Country Planning Acts (Kaushal, 2020). They include directives on environmental conservation, infrastructure development, and land-use zoning. Additionally, public participation is a vital element in the development of these master plans, but the process is sometimes non-participatory (Shahdarpuri, 2021). However, master plans are often criticised for being too 'simple' and may

not be adequate to address changing environments, such as the rapid urbanisation in India (Nallathiga, 2015).

(iii) *Local Area Plans.*

These plans oversee urban development while promoting sustainable growth (Gujar *et al.*, 2022). Customised to the unique features of each area, local area plans address specific needs (Sen, 2023). To meet localised requirements, they focus on infrastructure, population density, and land use. In some cases, master plans require the formulation of local area plans for each ward. For example, Delhi comprises 272 wards, each with its own local area plan tailored to its needs. Local area plans coordinate various urban services to minimise the negative impacts of urban sprawl (Sudhira *et al.*, 2007). Additionally, they encompass provisions for the management and preservation of open spaces (Gujar *et al.*, 2022).

(iv) *Zonal Development Plans.*

Zonal development plans are a key part of India's comprehensive statutory framework, which includes master plans that guide a structured approach to urban planning (Boob & Rao, 2014). The main aims of these plans are to set development parameters and classify land use. Effective implementation of these plans requires active public and stakeholder participation, alongside periodic policy reviews, as demonstrated by the zonal development plan of Hindaun (Nallathiga *et al.*, 2023). Furthermore, zonal impact assessments are conducted to evaluate the influence of development activities on various zones, thereby providing a holistic perspective on urban planning (Patel *et al.*, 2018). The concept of zoning within plots exemplifies an innovative approach to zoning, offering a more adaptable mechanism for subdivided plot areas. Zonal development plans have the potential to promote equitable growth across India's diverse urban and rural regions (Gujar *et al.*, 2022). Additionally, spatial planning support systems, such as GIS, can substantially improve the effectiveness of zonal plans.

Figure 6.8 shows the planning framework for India.

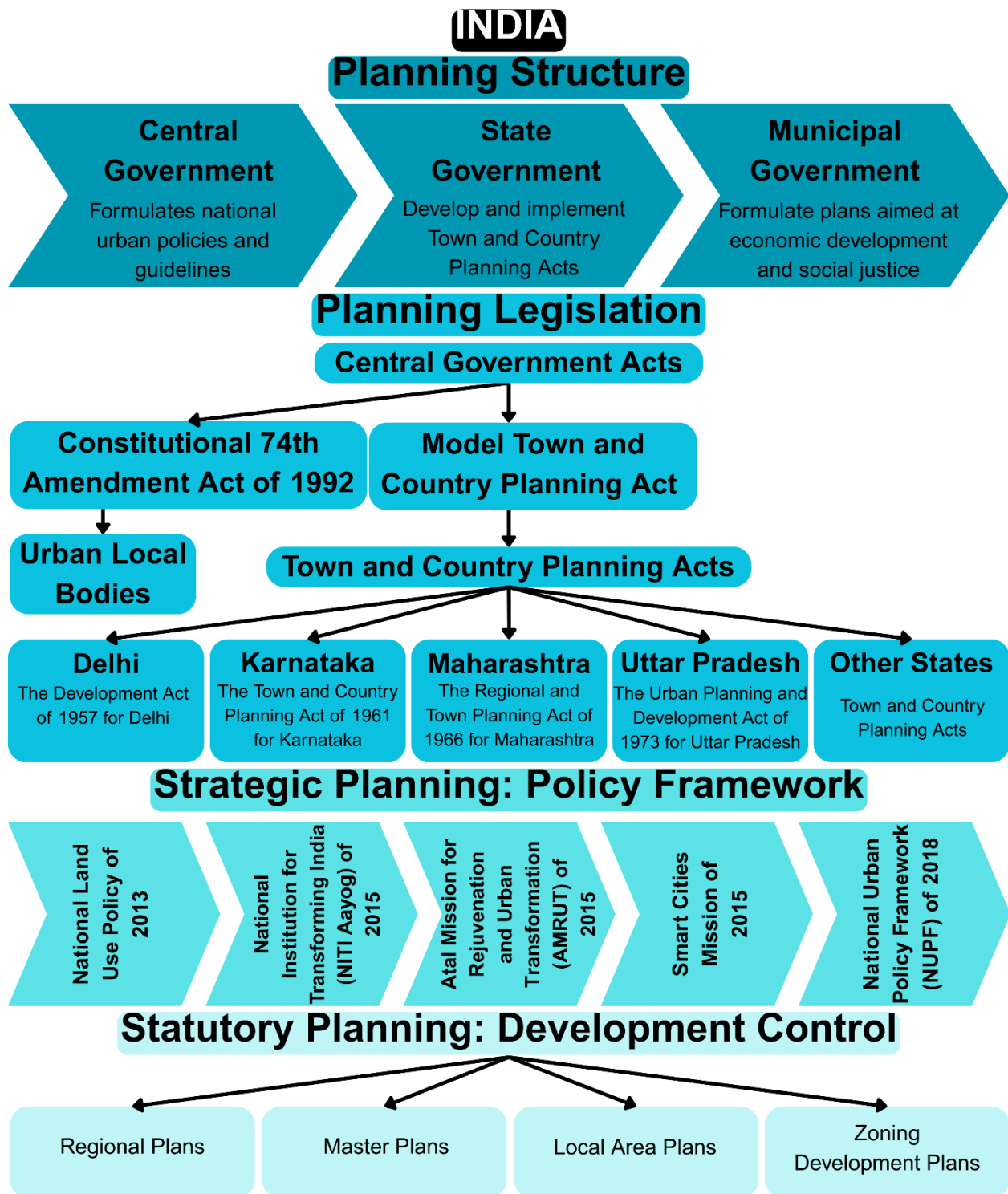


Figure 6.8: Planning Framework of India

Source: Own construction, based on the *Constitutional 74th Amendment Act* (1992) and the *Model Town and Country Planning Act* (1957)

6.3.6 Implementation and Challenges

Implementing spatial planning practices in India faces challenges related to environmental protection, transportation infrastructure, and urban growth. These challenges stem from institutional inefficiencies, poor infrastructure management, and socio-economic complexities (Maiti & Faria, 2017). Furthermore, India's population and geographical landscape are diverse, presenting additional challenges to implementing planning practices, necessitating custom approaches (Gupta *et al.*, 2024). The *74th Amendment Act* of 1992 sought to empower municipalities by granting them greater authority over planning processes. However, despite more localised planning practices, a disconnect remains between local administrative authorities responsible for planning and the public. This gap may be due to insufficient public participation and stakeholder engagement (Maiti & Faria, 2017). Effective execution of decentralised processes also depends on sufficient funding (Gupta *et al.*, 2024). Outdated land-use regulations impede India's capacity to integrate transport planning into urban development, highlighting a deficiency in transit-oriented development.

Other issues include inadequate public transport infrastructure. Financial constraints in transport development may also impede progress in integrating transport and planning, thereby undermining spatial equity and sustainable development. One of the biggest challenges for India's planning is rapid urbanisation (Pandey, 2015). A growing urban population puts pressure on services and infrastructure, increases pollution, and leads to overcrowded cities. This problem has been recognised, and the development of smart cities aims to reduce the adverse effects of rapid urban growth. However, a lack of financial support continues to hinder this effort, as creating smart cities requires adequate funding (Yuvaraja, 2020). The focus on environmental management strategies remains limited, as shown by the scarcity of natural resources, especially in poorer regions (Pandey, 2015). In the past, planning was done in a top-down manner, but since the abolition of the Planning Commission, management changes have created a coordination gap (Chhibber, 2022).

6.4 Morocco

6.4.1 General Country Information

Morocco lies in north-western North Africa, bordered by Algeria, the Atlantic Ocean, the Mediterranean Sea, and Western Sahara (Nfaoui & Sayigh, 2020). Covering 446,550 square kilometres, it is the 59th-largest country in the world (Thaiki *et al.*, 2023). Administratively, the country is subdivided into 12 regions, comprising 62 provinces and 13 prefectures, distinguishing rural provinces from urban prefectures (Fath, 2022). The capital, Rabat, lies between the Atlantic

Ocean and the Bouregreg River and is renowned for its Islamic and French colonial landmarks, including the Kasbah of the Udayas (Thaiki *et al.*, 2023).

With a total population of 38,448,854, Morocco is the 41st most populous country and features urban centres such as Casablanca (World Bank, 2023). The population density is 86 inhabitants per square kilometre, with an urbanisation rate of 65.1%. The country's land use is predominantly agricultural, forestry, and fisheries, while tourism, mining, and industry are also significant sectors (Fath, 2022). According to the World Bank (2023), Morocco's Gross Domestic Product (GDP) is USD 154 billion, with the service sector accounting for the majority. The poverty rate is 6.8%, with an inequality coefficient of 0.405 and a Human Development Index (HDI) of 0.700, indicating moderate development. Figure 6.9 presents a locality map and general country information of Morocco.

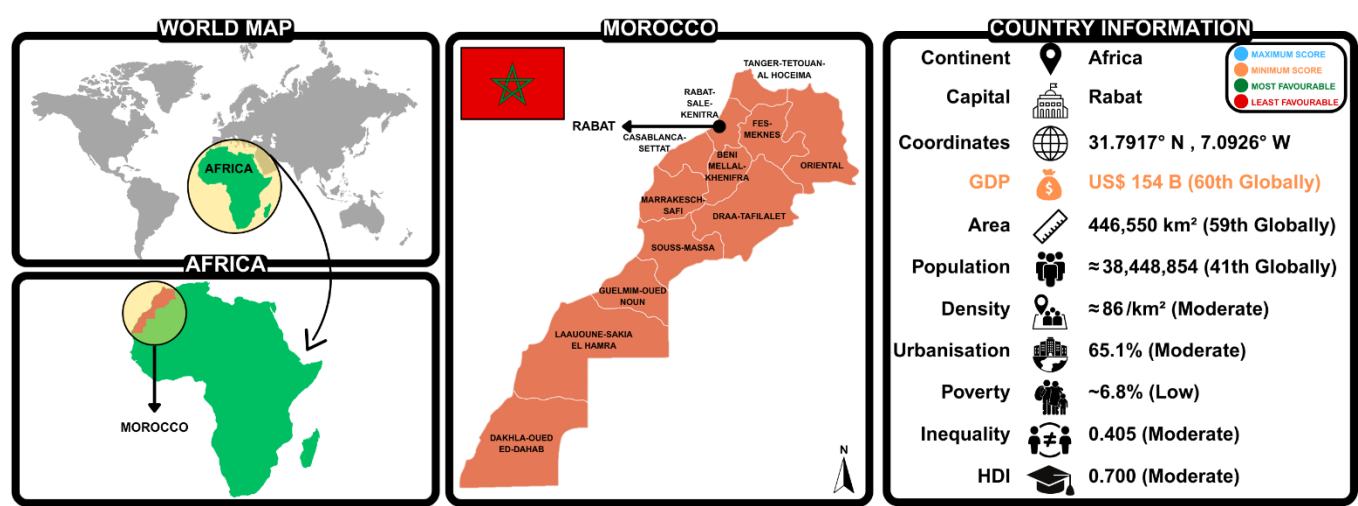


Figure 6.9: Locality Map and General Country Information of Morocco

Source: Own construction, based on World Bank (2023)

6.4.2 Administrative Structure

Morocco's administrative system combines modern reforms with historical influences, featuring a centralised structure that encompasses both contemporary and traditional institutions. As a constitutional monarchy, Morocco's King holds significant executive power, while the Prime Minister manages the government. The bicameral legislature comprises a House of Representatives with 395 seats and a House of Councillors with 120 seats (El Bazzim, 2024). The King, as a lifelong head of state, appoints the Prime Minister from the leading party after elections every five years. This system is rooted in Morocco's colonial past under French and Spanish protectorates, with the Spanish utilising a High Commissioner and local 'Khalifas' under the centralised 'Makhzen', and the French expanding regional political authority (Miller, 2013).

Since the *Constitution of the Kingdom of Morocco* (2011), Morocco has undertaken governance reforms to improve transparency, with a focus on administrative decentralisation to encourage citizen participation and equitable development (Benjouid *et al.*, 2024). Local governance is organised through municipalities and regional councils, with over 1,500 municipalities providing essential services under central laws. Municipal councils, elected by residents, are responsible for development strategies and budgets (Benjouid *et al.*, 2024). The country's twelve regions are governed by elected councils and a 'Wali', appointed by the King. Figure 6.10 provides a visual representation of Morocco's administrative structure.

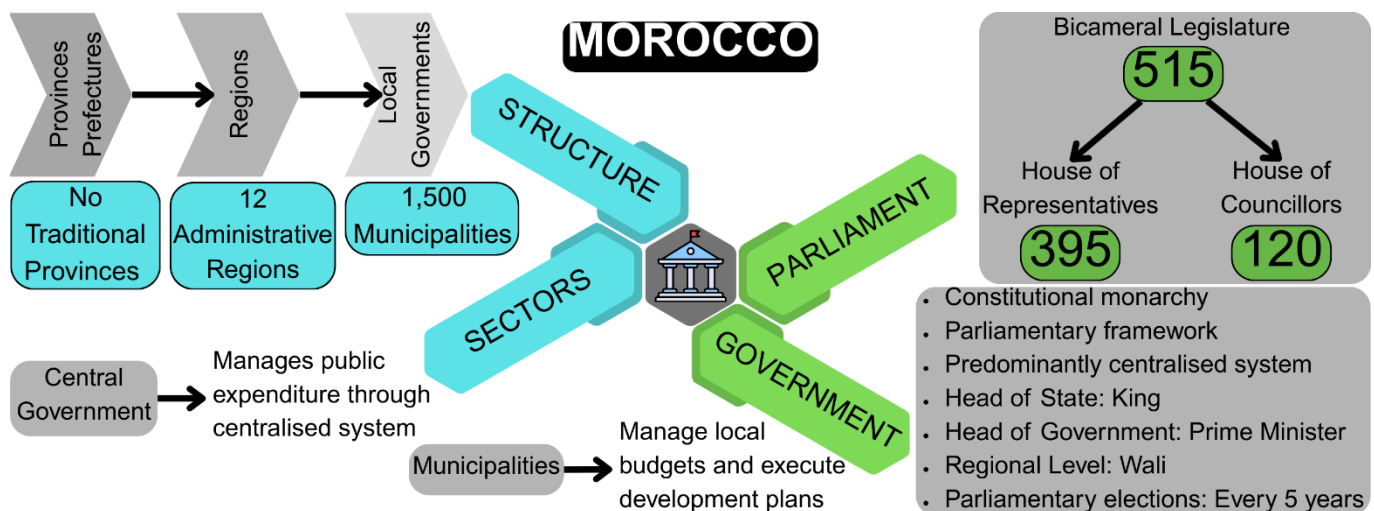


Figure 6.10: Administrative Structure of Morocco

Source: Own construction, based on *Constitution of the Kingdom of Morocco* (2011)

6.4.3 Planning Structure

Since gaining independence in 1956, Morocco's legislative framework for planning has undergone considerable change (Rahmouni & Saizen, 2024). Colonial regulations from the period when the region was a French protectorate continue to influence urban planning, development strategies, and regulatory practices, even after independence (Saizen, 2023). Morocco has reorganised its planning systems to better reflect local needs, values, and administrative frameworks by replacing or amending colonial administrative and planning structures with those aligned with Moroccan cultural norms, preferences, and administrative paradigms. The framework operates through a centralised organisational structure, supported by regional decentralisation and hierarchical planning mechanisms (Rahmouni & Saizen, 2024). Numerous additional legislative instruments reinforce the urban planning framework:

- (i) **Central Government:** The central government's responsibility is to formulate comprehensive national strategies and policies to guide planning efforts (Benbrahim,

2018). Furthermore, a regulatory framework is in place to ensure compliance with national planning guidelines (Saizen, 2023). The central government also distributes resources across the country to promote regional development (Ait Kadi & Ziyad, 2018). Finally, it ensures that Morocco's development aligns with international standards and trends.

- (ii) *Regional Government:* Regional councils, elected through the *Advanced Regionalisation Project* of 2010, are responsible for regional planning. With the authority to develop regional plans, these councils set strategic objectives for their regions and promote cooperation among municipalities (Fath, 2022). Consequently, these entities manage resources, allocate regional budgets, and coordinate projects (Benbrahim, 2018). Furthermore, regional councils facilitate the development of regional economic strategies and encourage investment for economic development.
- (iii) *Municipal Government:* Local government establishes municipal councils that have primary authority and responsibility for implementing national and regional planning legislation (Benbrahim, 2018). Municipal councils are also accountable for local planning, and each local government is responsible for developing and implementing local planning documents that align with national and regional objectives. The regulation and issuance of building and development permits fall under local government jurisdiction, and local governments have the authority to approve and issue them (Rahmouni & Saizen, 2024). Each municipal council is responsible for ensuring the provision and accessibility of municipal services and infrastructure throughout its area. In participatory planning initiatives, local governments need to ensure that consultation and participation processes are conducted thoroughly and adequately (Saizen, 2023).

6.4.4 Planning Legislation

The Moroccan planning system is established in accordance with the provisions of the *Constitution of the Kingdom of Morocco* (2011) and the *Advanced Regionalisation Project* of 2010, as set out in the *Urban Planning Law* of 1992. The system operates within a centralised structure coupled with regional decentralisation, characterised by a series of hierarchical planning instruments (Rahmouni & Saizen, 2024). The planning legislation of Morocco includes the following:

- (i) *Urban Planning Law* (12-90 of 1992).

Enacted on 17 June 1992, *Urban Planning Law* 12-90 forms the core legislative framework for urban planning in the Kingdom of Morocco. The legislation replaced most colonial-era planning regulations, establishing modern frameworks and systematic planning tools that apply from the national to the local levels (Saizen, 2023). Nevertheless, colonial planning legislation established

a dual planning system comprising formal planning professionals and informal governments, which influenced the implementation of new planning laws and left a legacy (Rahmouni & Saizen, 2024). It outlines fundamental principles for zoning and the strategic development of urban areas. Furthermore, it aims to protect the environment, particularly agricultural land, from the impacts of rapid urbanisation (François *et al.*, 2013). Encouraging public participation in planning decisions remains challenging, mainly because they have been previously marginalised from decision-making. For effective implementation, municipalities must develop comprehensive master plans for zoning and urban growth. The process of deconcentration and decentralisation is thus incremental, and the establishment of urban agencies aims to assist in the transition towards decentralisation (Dryef, 1993). It is believed that decentralising the planning authority will enhance urban governance (Dryef, 1993). The process is further strengthened through the *Advanced Regionalisation Project* of 2010, which aims to improve decentralisation by aligning local planning with national objectives (Benbrahim, 2018).

(ii) *Subdivision, Housing Groups and Land Divisions Law* (25-90 of 1992).

Law 25-90 of 1992 governs the use of land for adequate housing and development. Its objective is to guide the orderly and equitable development of land, thereby ensuring the optimal use of resources. The planning system developed during the colonial era has shaped Morocco's land-use patterns, leading to the modern approach to land use (Pinson, 1994). *Law 25-90* of 1992 classifies land into various categories, including state land, collective land, military land, religious land, and private land (Balgley & Summer, 2015). This land-use classification system is notably complex, as each category is associated with its own administrative procedures and legal considerations, thereby creating a non-uniform framework (Balgley & Summer, 2015). The promotion of equitable land distribution faces challenges due to inadequate governance and insufficient regulatory integration (Bouaicha & Berqia, 2025). Furthermore, environmental pressures and rapid urbanisation hinder the effective implementation of legislation, resulting in issues such as informal settlements, land degradation, and urban sprawl (Bouaicha & Berqia, 2025).

(iii) *Constitution of the Kingdom of Morocco* (2011).

The territorial governance framework in Morocco underwent a significant change following the *Constitution* (2011), which further reinforced the core principles of the country's advanced regionalisation (El Bazzim, 2024). These constitutional principles were implemented through *Organic Law 111-14* on regions, which established directly elected regional councils with considerable authority and responsibility for territorial development (Fath, 2022).

6.4.5 Spatial Planning

- **Strategic Planning: Policy Framework**

Morocco's planning policy framework is primarily based on the *Constitution of the Kingdom of Morocco* (2011), which defines urban planning and land management. This framework comprises:

- (i) *National Spatial Development Framework (SNAT)* of 2004.

The *SNAT* of 2004 aims to address the challenges posed by regional disparities and rapid urbanisation by guiding the country's spatial organisation. Enhancing regional competitiveness and promoting decentralisation are identified as key factors that can significantly reduce regional inequality in Morocco (Far-Hat, 2016). The *SNAT* of 2004 also promotes regionalisation, which can strengthen local government capacity and public participation (Far-Hat, 2016). While urbanisation often has adverse effects on urban planning, Morocco has found that it can also yield positive outcomes. In Morocco, 75% of GDP and 70% of national investment stem from urban economic growth. However, urbanisation also brings challenges such as inequality and poverty (Bouaicha & Berqia, 2025). Therefore, the *SNAT* of 2004 seeks to maximise the economic potential of cities while addressing these issues (Lall *et al.*, 2019). The *SNAT* of 2004 identified infrastructure that supports connectivity between urban and rural development as a crucial development tool (Lall *et al.*, 2019). Innovative urban development ideas introduced by the *SNAT* of 2004 include the creation of new towns and eco-cities, which may also improve access to housing.

- (ii) *National Urban Policy Framework (PUN)* of 2012.

The *PUN* of 2012 is designed to support equitable economic development in urban areas, thereby improving quality of life. According to Lall *et al.* (2019), 60% of Morocco's population resides in urban areas, driven by urbanisation. The *PUN* of 2012 seeks to harness the benefits of urbanisation to enhance the economic development of cities within a new growth model. This model also aims to reduce disparities in territorial development. However, challenges such as urban poverty and inequalities persist in Moroccan cities (Lall *et al.*, 2019). Therefore, the *PUN* of 2012 intends to distribute the benefits of urbanisation more evenly across regions and to address spatial inequality. It further aims to develop selected cities into eco-cities, such as Benslimane (Martín, 2019). The objective is to incorporate ecological urbanism principles into development initiatives to create cities that are more environmentally friendly, promote sustainable mobility, and offer more liveable spaces (Martín, 2019). The *PUN* of 2012 recognises that achieving these objectives requires improvements in governance, the establishment of coherent policies, and the integration of multiple sectors (Kinyanjui, 2020).

(iii) *National Sustainable Development Strategy (SNDD)* of 2014.

This policy aims to promote the development of eco-neighbourhoods and eco-cities to achieve sustainability by 2040. Its central focus is on integrating social, economic, and environmental development to reduce inequalities in socio-economic progress and advance social justice within urban environments (Chehbouni, 2024). Women are significantly underrepresented in economic participation in Morocco, and the *SNDD* of 2014 aims to address this by increasing their activity rate to 45% by 2035. Although this initiative mitigates economic inequality, it also has the potential to raise Morocco's GDP by 39.5% (Benbrahim, 2018). Rural populations remain vulnerable to poverty, and the *SNDD* of 2014 endeavours to alleviate rural deprivation (Benbrahim, 2018). Additionally, the *SNDD* of 2014 supports Morocco's transition to a green economy characterised by low carbon emissions and efficient resource utilisation (Benbrahim, 2018). To establish a sustainable economy, it is imperative to foster cross-sectoral collaboration to ensure transparency across sectors. Recognition of renewable energy in Morocco is increasing, and the *SNDD* of 2014 aims to integrate renewable energy sources into spatial planning (Nachoui, 2019). Achieving sustainability objectives requires the systematic adoption of contemporary planning methodologies and technological innovations. The implementation of this policy is further reinforced through a phased approach to urban development in Morocco (Chehbouni, 2024).

(iv) *National Climate Plan* of 2015.

With international aid, Morocco aims to reduce its emissions by 40% by 2030. To lower emissions, Morocco is developing renewable energy sources, such as wind and solar power, to reduce reliance on fossil fuels, aiming to utilise 100% renewable energy (Bouramdane, 2024). However, investment in renewable energy development largely depends on the private sector. It has been projected that water sources in Morocco will decline by up to 40.6% by 2080, underscoring the country's water crisis (Sinan & Belhouji, 2016). Consequently, to ensure the sustainable utilisation of water resources, the *Climate Plan* of 2015 advocates the use of non-conventional water sources, such as wastewater reuse and desalination, to enhance water efficiency (Sinan & Belhouji, 2016). This plan emphasises the importance of adaptive, resilient urban planning in response to climate change.

(v) *National Development Model (NMD)* of 2021.

The *National Initiative for Human Development* of 2015 provides a foundation for the objectives outlined in the *National Development Model (NMD)* of 2021, with the 2015 initiative initially aimed at addressing socio-economic issues. The *NMD* of 2021 recognises the need for Morocco to modernise its governance and public administration. Initiatives such as the digitisation of

administration and the implementation of the public services charter aim to coordinate modernisation reforms (Sebbahi *et al.*, 2022). Since the enactment of the *Constitution of the Kingdom of Morocco* in 2011, the nation's governance framework has been evolving, marked by the creation of new institutions and instruments to support strategic planning. Nonetheless, the execution of the *NMD* of 2021 requires further reinforcement of governance structures. Like the *Climate Plan* of 2015, the *NMD* of 2021 emphasises the importance of sustainable energy resources and the development of renewable energy projects to fulfil climate commitments (Sebbahi *et al.*, 2022). Agriculture, a vital sector that significantly contributes to Morocco's economy, is expected to transform to encourage more sustainable practices and reduce water scarcity (Sraïri, 2021).

- **Statutory Planning: Development Control**

Development control mechanisms are grounded in administrative authorisation requirements that compel landowners to obtain permits before commencing any development activities. These regulatory systems operate within a hierarchical governance framework in which local authorities assume primary responsibility for overseeing development. The principal development control mechanisms include:

- (i) *Regional Territorial Development Plan (STRAT)*.

Regional plans are systematically developed for each administrative region. Their primary objective is to address territorial disparities and foster equitable regional development by harnessing each area's distinctive characteristics and growth potential (Jafari & Moujaddidi, 2016). Regional councils are authorised by the *Constitution of the Kingdom of Morocco* (2011) and *Organic Law 111-14* to oversee regional planning activities (Fath, 2022). Historically, the colonial era divided Morocco into regions based on inefficiency, creating structural inequalities; therefore, these plans are specifically designed to reduce these negative impacts (Lall *et al.*, 2019).

- (ii) *Master Urban Development Plan (SDAU)*.

Master plans are formulated to guide urban development and mitigate the impacts of urbanisation, particularly as Morocco experiences increased urban expansion. They are especially crucial for the future of urban development in Morocco, with projections indicating that by 2050, 75% of the population will reside in urban areas (Lall *et al.*, 2019). These plans aim to promote equitable development and address historical injustices, with particular emphasis on improving infrastructure in underserved communities (Lall *et al.*, 2019). Furthermore, master plans aim to

address problems linked to urban sprawl and the transformation of farmland, thereby promoting sustainable growth and protecting valuable land resources (Bounoua *et al.*, 2024).

(iii) *Detailed Development Plan (PA).*

Detailed plans serve as local implementation documents that address land-use designations and regulatory controls through zoning regulations (El-Ouali & Magdoud, 2024). They also outline the local infrastructure and services required for development. Detailed plans aim to bridge the gap between formal planning practices and informal governance structures, promoting context-specific, inclusive development plans and modernising the planning system (Rahmouni & Saizen, 2024). Due to Morocco's colonial history, sustainable development faces challenges arising from inadequate governance frameworks. Nevertheless, the country utilises digital tools to ensure compliance with zoning plans and to encourage sustainable land use (Bouaicha & Berqia, 2025). Additionally, detailed plans emphasise marine spatial planning as a vital component of the Blue Economy Programme, which seeks to support the sustainable development of coastal regions (El-Ouali & Magdoud, 2024).

(iv) *Zoning Development Plan (PZ).*

Zoning plans are a key part of Morocco's planning system, as most urban areas in Morocco are characterised by economic concentration and rapid urbanisation (Laadssi & Hanzaz, 2025). The lack of integrated land information in Morocco creates significant challenges for developing zoning plans, as scattered data complicates decision-making (Lall *et al.*, 2019). Therefore, the successful creation and implementation of zoning plans require greater collaboration among stakeholders and the development of mechanisms that address local needs, ensuring the sustainable growth of urban areas (Prajapat, 2025).

Figure 6.11 shows the planning framework for Morocco.

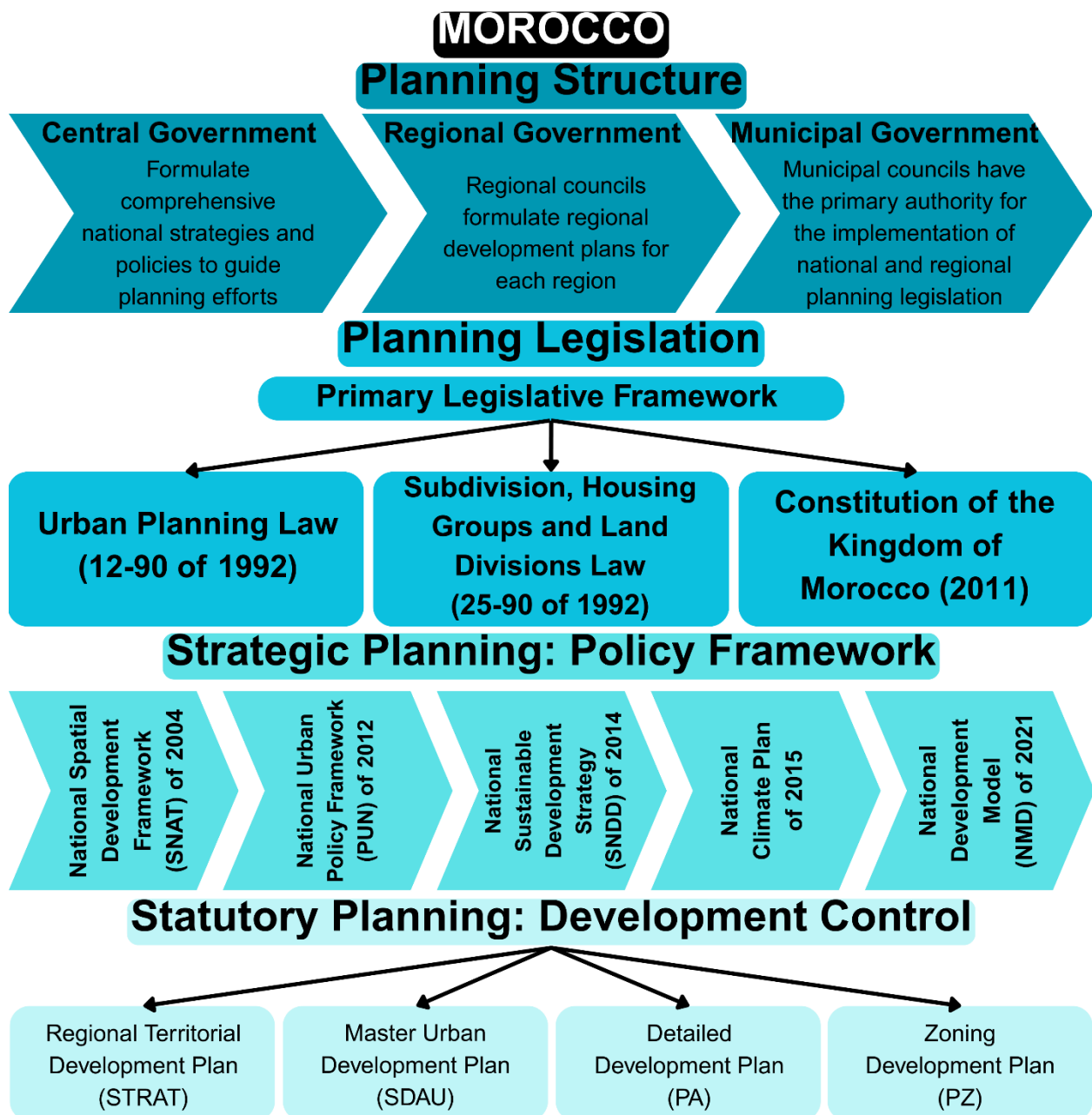


Figure 6.11: Planning Framework of Morocco

Source: Own construction, based on the *Constitution of the Kingdom of Morocco* (2011) and *Urban Planning Law* (1992)

6.4.6 Implementation and Challenges

A significant factor contributing to the challenges of spatial planning in Morocco is the presence of regional disparities and rapid urbanisation, particularly when combined with insufficient governance and a lack of integration of digital tools. Rapid urbanisation results in urban sprawl, often accompanied by informal land practices and land degradation (Bouaicha & Berqia, 2025). This phenomenon is especially evident in rural and peri-urban areas (Bouaicha & Berqia, 2025).

Furthermore, the disconnection between ecological regulations and cadastral data leads to fragmented environmental planning management (Bouaicha & Berqia, 2025). Ultimately, these issues hinder the effective implementation of zoning plans and promote unauthorised planning activities.

Advanced regionalisation remains in its early stages due to constraints imposed by political, social, and historical factors. However, when applied effectively, it enables regions to tailor planning practices to their specific needs and implement them efficiently (Jafari & Moujaddidi, 2016). The dysfunctional nature of governance in Morocco affects the diversity of territories and regions, as well as the democratic management of planning processes (Jafari & Moujaddidi, 2016). There is a lack of information systems for land use and planning practices in Morocco, and many urban areas are characterised by outdated infrastructure. This situation may further hinder planning efforts amid rapid urbanisation. Although urbanisation shows promising prospects, it has yet to deliver the expected economic and developmental benefits from public investments (Lall *et al.*, 2019). There is an urgent need to integrate policies that ensure spatial equity and improve returns on urbanisation investments. Thus, when correctly managed, urbanisation can generate significant economic benefits (Lall *et al.*, 2019).

6.5 Conclusion

This chapter examines spatial planning practices in developing countries, with a particular focus on Brazil, India, and Morocco. An overview of each country's characteristics was compiled through a brief investigation of their general aspects. This investigation revealed the following:

- (i) Brazil has the highest levels of poverty and inequality. The rapid expansion of urban areas in Brazil, indicated by the high urbanisation rate, may have led to an increase in informal settlements. This, in turn, could have contributed to the elevated rates of poverty and inequality, highlighting the shortcomings of spatial planning practices in effectively tackling these issues. Additionally, Brazil is classified as an emerging country.
- (ii) India has the highest GDP and the largest population. Although it has the highest population density, it also has the lowest urbanisation rate. Additionally, India has the lowest HDI value. India not only has the highest GDP and the largest population among the case studies, but it also ranks 5th and 1st globally. Its significant GDP is driven by its large population and expanding industrial sectors. The high population density indicates that high-density areas characterise urban development in India. Such developments pose substantial challenges for urban planners in accommodating large populations within cities. The fact that India has the lowest urbanisation rate might suggest that urban planners face fewer challenges from rapid urban expansion. The low HDI value indicates

that India is the least developed country among the case studies analysed, which may reflect less advanced spatial planning practices.

- (iii) Morocco has the lowest GDP among the six case studies. The main reasons are the large informal agricultural sector, insufficient educational provision, reliance on economic sectors, and external dependencies.

Despite various initiatives by these developing countries to address informality, inequality, and fragmentation, these issues persist. These challenges are consistently observed across all three countries. Spatial planning practices in Brazil mainly focus on inclusion through participatory planning methods. Meanwhile, India recognised the need to enhance indigenous capacity by prioritising decentralisation and digital innovation. Morocco, on the other hand, adopts a strategy that combines regional development with centralised coordination to meet its spatial planning goals, which aim for fair and balanced urban growth.

Emerging economies often show weaknesses in their institutional structures and financial resources compared with developed countries. However, these countries usually offset these limitations by adopting adaptive, community-focused planning strategies that emphasise social inclusion and empowerment. The participatory planning approaches employed by Brazil and India highlight the importance of grassroots involvement in achieving fair urban development.

In contrast, Morocco emphasises long-term spatial goals and the importance of national leadership in urban planning. These countries are moving towards integrative and socially aware planning methods, despite the challenges posed by bureaucratic and policy issues. The aim of this research is to shed light on the lessons and insights gained by developing economies in promoting sustainable and equitable spatial development. Additionally, Chapter 8 will address this evaluation.

CHAPTER 7 SPATIAL PLANNING IN SOUTH AFRICA

7.1 Introduction

Assessing how new legislation supports improved urban planning strategies requires a thorough review of both historical and current practices. This assessment aims to identify significant changes or improvements in urban planning practices. Analysing previous urban planning initiatives alongside current operations within South Africa's socio-economic context, government administration, and legal frameworks offers insights into how effectively urban planning practices address the needs of the emerging democratic society.

This chapter focuses on the study's primary aim: to examine the evolution of South Africa's spatial planning practices. Therefore, this section will thoroughly examine the research question "How have South Africa's spatial planning practices evolved since the end of apartheid?" Additionally, in accordance with the study's primary objectives, this chapter aims to: (i) analyse the impact of different practices on sustainability, equity and urban and rural development, (ii) identify opportunities and best practices from case studies, and (iii) contribute to the literature to help build a better understanding of the dynamics of land use and spatial planning in South Africa (see Section 1.3, Objective i, ii and iv).

The following sections critically examine the spatial planning frameworks used in South Africa, with particular focus on the periods before and after 1994, covering: (i) general country information, (ii) administrative structure, (iii) the evolution of spatial planning during that period, (iv) legislative frameworks governing planning (statutory planning), and (v) South Africa's strategies for addressing sustainability, spatial equity, and urban and rural development (strategic planning). This review aims to give readers a thorough understanding of the development and impact of these spatial planning frameworks. Figure 7.1 provides a visual outline of the chapter's structure.

Chapter 7: Spatial Planning: South Africa's Perspective



Figure 7.1: Structural Framework of Chapter 7

Source: Own construction

7.1.1 General Country Information

The Republic of South Africa (RSA) is a sovereign state on the African continent (Naidoo, 2020). It shares borders with Eswatini, Mozambique, Zimbabwe, Botswana, and Namibia, and lies between the Indian and Atlantic Oceans. The country is ranked 25th worldwide by land area, covering 1,220,813 square kilometres (Isaacs & Friedrich, 2006), and by population, with approximately 63.02 million inhabitants (World Bank, 2023). South Africa's population density is 52 people per square kilometre. The country features a tri-capital system, with Pretoria serving as the administrative capital, Cape Town as the legislative capital, and Bloemfontein as the judicial capital (Pretorius & Macera, 2009).

Additionally, Johannesburg is the most populous city in South Africa (Naidoo, 2020). The country's urbanisation rate is 66.3%, making it one of the most urbanised countries on the African continent (World Bank, 2023). South Africa has Africa's largest economy, with a GDP of 380 billion USD, ranking 40th worldwide (Sciarelli & Rinaldi, 2017). The main sectors contributing to this economic strength include mining, manufacturing, agriculture, tourism, and financial services. South Africa also has a high inequality coefficient of 0.63 and an HDI of 0.713, with 62.7% of its

population living in poverty (World Bank, 2023). Figure 7.2 below shows a locality map and general country information of South Africa.

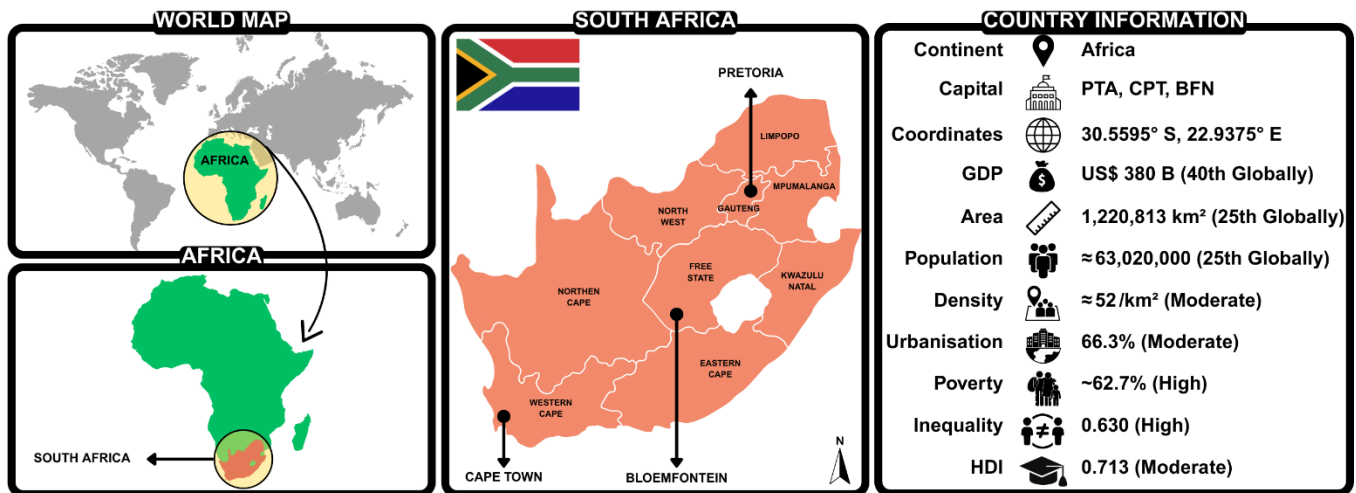


Figure 7.2: Locality Map and General Country Information of South Africa

Source: Own construction, based on World Bank (2023)

7.2 Spatial Planning in South Africa: Pre 1994

“Cities are the product of decisions taken over long periods of time; planning must therefore be understood historically” (Hall, 2014)

A thorough analysis of current spatial planning dynamics in South Africa requires a comprehensive understanding of its historical background. The colonial era established systemic racial segregation and discriminatory practices, laying the foundation for the apartheid regime. Moreover, the structures and practices created during the colonial era were further institutionalised and reinforced during the apartheid era (Moila, 2024). The enduring impact of apartheid has profoundly influenced spatial planning and land distribution, mainly through discriminatory laws. Therefore, understanding the historical context is essential for addressing past injustices and promoting sustainable development, as it critically shapes modern challenges and reforms in spatial planning (Berrisford, 2011).

7.2.1 Administrative Structure

A predominantly centralised administrative structure characterised South Africa's governance framework. In 1910, South Africa was established as the Union of South Africa by merging the Orange Free State, Cape Colony, Transvaal, and Natal into a single self-governing Dominion (Spencer, 2013). Consequently, South Africa was recognised as a constitutional monarchy within the British Commonwealth. In 1948, the National Party's victory in the general election led to the

formalisation of apartheid, a system of enforced racial segregation and discrimination (Berat, 1995). The government introduced a comprehensive legislative framework to institutionalise the segregation of racial groups in residential areas, employment sectors, and educational institutions (Handley, 1998). South Africa officially gained independence in 1961, transforming from a dominion to a republic. The state president simultaneously served as both the head of state and the head of government.

Black citizens were systematically prevented from participating in national political representation, as voting rights were granted only to White citizens (Brookes, 2022). The legislative body was bicameral, comprising the Senate and the House of Assembly, with representation for members of the White population. In 1983, the legislative body changed to a tricameral system, providing limited representation for people of Coloured and Indian descent while still excluding those of Black descent (Aremu, 2011). The legislative body included the House of Assembly for White representatives, the House of Representatives for mixed-race representatives, and the House of Delegates for Indian representatives (Uys, 2022).

A key feature of the apartheid administration was the creation of ten self-governing homelands (Klein, 1987). Moreover, the National Treasury managed public expenditure, resulting in an unequal distribution of resources that favoured white areas over the broader population (González, 2022). Separate financial allocations were also designated for different racial groups, but these allocations displayed apparent disparities. As a result, the homelands became economically dependent and were severely underfunded (Fernandez, 2020). Figure 7.3 illustrates the administrative structure of South Africa.

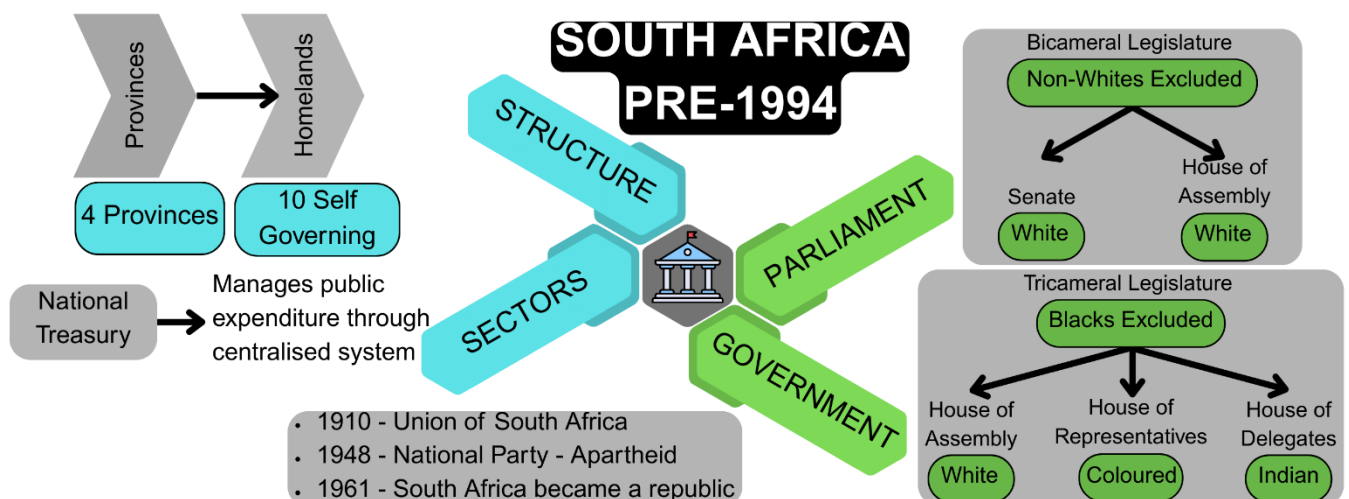


Figure 7.3: Pre-1994 Administrative Structure of South Africa

Source: Own construction, based on Onana (1994) and Fernandez (2020)

7.2.2 Spatial Planning Evolution

South Africa's colonial history and close connections to Britain facilitated the early adoption of urban planning ideas. In South Africa, urban planning focused mainly on land-use regulation rather than social welfare, marginalising certain communities (Njoh, 2009). Additionally, South Africa's industrialisation was still in its early stages, so the cities were relatively underdeveloped and lacked dedicated factory zones. Between 1910 and 1920, as the newly formed nation adapted to its emerging administrative structure, there was a heightened focus on urban upgrades (Nel, 2016). During this period, a housing shortage was recognised; however, the primary concern shifted to the potential health risks associated with industrialisation.

Furthermore, socio-economic conditions were transforming, prompting municipalities to cultivate greater awareness of urban environmental challenges that required intervention (van Graan, 2009). However, the outbreak of World War I between 1914 and 1918 caused significant disruptions. Before 1930, there was a notable lack of both legislative initiatives and administrative structures necessary for the localised implementation of urban planning initiatives oriented towards social welfare objectives (Bonner, 1995). Thus, by 1930, the displacement of Black individuals from urban centres was primarily driven by the challenges associated with urban environments, explicitly identified as multi-racial slum conditions (Browett & Fair, 1974).

The apartheid ideology, established in the 1940s, significantly shaped urban development policies, primarily by seeking to restrict the urbanisation of the Black population (Baranowska, 2009). Following the economic recovery after World War II in 1945, distinct features of urban development began to emerge, characterised by the rapid expansion of suburban housing areas (Donaldson, 2001). From around 1960, the swift growth of cities, combined with financial pressure on municipalities to provide essential infrastructure services, exposed the inefficiencies of the urban planning system (Maharaj, 2020). Furthermore, the national government reluctantly recognised the need to create urban residential zones for non-white communities, a measure intended to secure the vital labour force required for urban centres to function (Berrisford, 2011).

Consequently, the creation of designated 'townships' for non-white populations, strategically located on the outskirts of urban centres, played a significant role in the development of 'apartheid cities' (Maharaj, 2020). The spatial organisation was defined by a core-periphery model, in which economic activities were mainly concentrated in the centres, while peripheral areas remained underdeveloped and dependent. The apartheid planning system fragmented urban and rural landscapes through complex strategies for designated White areas and restrictive policies for Black zones (Lemon, 2016).

Amid significant transformations, an apparent crisis in the availability and affordability of housing and residential land has emerged (Baranowska, 2009). The crisis prompted multiple governmental commissions of inquiry to examine matters including the cost of residential land, the involvement of financial institutions in housing finance, and the provision of housing finance to the non-white urban population (Maharaj, 2020). As a result, in 1982, the 'Commission of Inquiry into Township Establishment and Related Matters' was established, later known as the Venter Commission. Municipalities expressed concern that unregulated township approvals hinder structured planning and infrastructure financing, highlighting the essential role of strategic planning (Berrisford, 2011).

During the 1980s, the untenability of apartheid legislation necessitated reforms. These included restructuring regional programmes and strengthening corporate collaboration (Lemon, 2016). The end of apartheid in 1991 marked a pivotal shift towards inclusive and equitable spatial planning, despite challenges posed by past practices (Baranowska, 2009). The enactment of apartheid legislation played a crucial role in shaping South Africa's spatial planning and development before the establishment of democratic governance in 1994. During this transition phase, the socio-economic and spatial planning framework underwent profound changes due to several legislative reforms (Nel, 2016).

7.2.3 Planning Structure

The South African planning structure was characterised by a hierarchical, top-down approach and considerable government intervention, both of which were vital to maintaining racial disparities and the ideology supporting apartheid:

- (i) *National Government:* The national government exercised its regulatory authority to centralise the economy and enforce racial segregation, using spatial planning as a strategic tool to manage urban development in line with its objectives (Maharaj, 1992). After the formation of the South African Union, racial segregation became a core element in shaping spatial planning laws and resource allocation. The primary role of the national government at that time was legislative and directive, involving the creation of racial and land-use regulations, which were then enforced by local authorities (Christopher, 1992). During the period of National Party rule, spatial planning was systematically used to uphold and reinforce apartheid ideology. The government held extensive legislative and administrative control over all spatial planning activities, especially in regulating industrial and economic growth (Baranowska, 2009). A dual spatial planning system emerged, with urban areas designated for White populations developing separately from areas allocated

to non-white populations, which remained vastly underdeveloped (Oranje & Merrifield, 2010).

- (ii) *Provincial Government:* Before the formation of the South African Union, the Orange Free State, Cape Colony, Transvaal, and Natal each enacted statutory measures to develop urban areas. After the union was established, the provinces were assigned four specific government responsibilities (Pieterse, 2006). These included education (schools), healthcare (hospitals), provincial infrastructure (roads), and local governance (municipal administration). Urban planning was part of municipal governance and remained under provincial authority (Maharaj, 1995). Rather than creating legislation, the provinces acted as intermediaries, implementing and supervising regulations relevant to national spatial planning. During apartheid, provincial authority was significantly limited, as it was both delegated and controlled by the national government (Nel, 2016).
- (iii) *Municipal Government:* After the formation of the South African Union, local government autonomy was restricted, and municipalities operated under provincial government jurisdiction (Pieterse, 2006). The primary responsibilities of municipalities included urban planning, housing infrastructure, transportation networks, sanitation systems, and the overall management of urban environments. During the National Party's administration, municipal authorities served as the implementing bodies responsible for enforcing spatial legislation (Maharaj, 1997). As a result, the Venter Commission recommended transferring land development oversight to municipal authorities for township establishment and zoning approvals (Bikam, 2016). However, municipalities needed to be 'authorised local authorities' with Administrator-approved plans, but unclear guidelines and a lack of skills hindered this. Ultimately, all municipalities were granted the authority to transfer planning responsibilities from provincial oversight, as the rate of urban expansion surpassed provincial administrative capacity (Baranowska, 2009).

7.2.4 Planning Legislation

Colonial and apartheid practices profoundly shaped the development of planning legislation from 1910 to 1994. Modern planning laws have been developed in response to the socio-economic inequalities and injustices that these historical laws created.

- (i) *Natives Labour Regulation Act* (15 of 1911).

The *Natives Labour Regulation Act* 15 of 1911 was enacted to secure a consistent, low-wage workforce for European settlers engaged in mining and agriculture. The socio-economic transformation observed in South Africa, characterised by the expansion of the mining industry, ultimately led to the creation of this legislation (Walker, 2014). The act was introduced to restrict

the mobility of Black labourers, ensuring their labour contributions remained confined to enterprises owned by White individuals. As a result, strict regulations were put in place to control both the mobility and employment conditions of Black workers, ensuring compliance with the legislation (Murray, 1989). Consequently, Black labourers were limited to specific industries or employers and often subjected to harsh, exploitative working conditions (Hall, 2014). This act effectively sustained the exploitation and socio-economic marginalisation of indigenous African communities, perpetuating poverty and inequality into the twentieth century (Calitz, 2004).

(ii) *Natives Land Act* (27 of 1913).

The *Natives Land Act* 27 of 1913 defined the term 'native' as an individual affiliated with an indigenous African race or tribe (Beinart & Delius, 2014). The legislation established a systematic framework for racial segregation in South Africa by legally restricting the Black majority from purchasing or leasing 93% of the nation's land, designated for the White minority, thereby limiting the Black population to the remaining 7% of the land (van Wyk, 2013). This resulted in the forced displacement of African communities and the creation of designated reservations for them (Swart, 2014). Section 1a of the *Natives Land Act* 27 of 1913 allowed African individuals to engage in land transactions within designated reserves, whilst simultaneously prohibiting White individuals from acquiring land in these regions. Its primary aim was to impose regulatory restrictions on land ownership for Africans, thereby limiting their economic participation mainly to low-wage employment in industries predominantly owned by White individuals (van Wyk, 2013). Additionally, it aimed to end the practice of sharecropping and to define the boundaries of reserves, effectively confining African economic activities to employment under White agriculturalists and industrialists (Ramutsindela, 2013). The legislation was enforced before land allocation was decided for those identified as Black and White, maintaining a ban on Black individuals acquiring land outside the 'scheduled areas' (Swart, 2014). Later, a commission was established to address land allocation issues, leading to the formation of the Native Land Commission (NLC).

(iii) *Housing Act* (35 of 1920).

Following the Spanish influenza pandemic, there was growing recognition of the urgent need to improve social welfare programmes (Mabin, 2020). The *Housing Act* 35 of 1920 allocated financial resources to municipal authorities to develop public housing for economically disadvantaged populations (Mabin, 2020). Housing development programmes were required to comply with statutory regulations that enforced racial segregation policies. These regulations required areas to be divided into separate racial zones, with open spaces serving as buffer zones to facilitate separation (Parnell, 1989). Additionally, the regulatory framework required each designated racial

zone within a spatial district to have its own access road. These legislative measures were primarily intended to address housing shortages that disproportionately affected the White population, reflecting the era's racial and socio-economic frameworks (Mmbadi *et al.*, 2023). Consequently, the Black population continued to face systemic neglect and poor living conditions. The *Housing Act* 35 of 1920 was the first national legislation to develop public housing and marked an important milestone in the evolution of housing policy. Furthermore, a Central Housing Board was established to oversee the implementation of its initiatives (Tiwari *et al.*, 2016). Although efforts were made to reduce housing shortages, these measures also exposed municipal governance challenges and perpetuated racial inequalities.

(iv) *Natives (Urban Areas) Act* (21 of 1923).

The *Natives Act* 21 of 1923 was enacted to enhance welfare provisions and improve regulatory oversight. Its objective was to improve the quality of life for indigenous populations residing near urban centres and to strengthen governance to address issues pertinent to these communities (Maharaj, 2020). The act mandated the establishment of advisory boards within Black townships as a strategic measure to achieve these objectives. However, the financial obligations imposed by the act have exerted considerable pressure on municipal authorities, resulting in shortages of housing and services for Black communities (Parnell, 1998). Consequently, due to financial constraints, municipal authorities often neglected their statutory duty to provide housing and services for Black labourers, leading to substandard living conditions and the extensive growth of informal settlements (Parnell, 2003). In certain contexts, both Black and White populations experienced adverse health and economic effects owing to this neglect (Maharaj, 2020). Although the act's aims were explicitly delineated, municipal approaches varied according to local economic interests, thereby undermining the uniform enforcement of urban segregation policies (Hyman, 1973).

(v) *Natives Administration Act* (38 of 1927).

The *Native Administration Act* 38 of 1927 was a landmark piece of legislation for the administration of African affairs. It established a separate legal system to govern the African judicial structure, placing Black regions under a distinct political regime outside the country's main administrative framework. In these areas, governance was implemented solely by executive decree rather than through parliamentary processes and legislation (Madondo, 2023). The primary goal of the act was to develop a comprehensive system of national 'native administration' to reduce political tensions caused by laws enforcing territorial segregation. It was designed to fit within the broader framework of territorial segregation rather than to reinforce traditional authority (Madondo, 2023). The Department of Native Affairs was given the power to improve local

governance and oversee the appointment of chiefs in African territorial areas. This arrangement maintained the existing racial hierarchy and reinforced the subservience of African populations (Evans, 1997). The legislation approved the creation of 'self-governing' homelands, which were deliberately underfunded to limit African political and economic influence, thereby maintaining a low-wage labour force for enterprises owned by white individuals (Crais, 2006). Colonial authorities often clashed with traditional institutions, as they prioritised the interests of colonial powers over those of the indigenous populations (van den Berghe & Evans, 1999).

(vi) *Development Trust and Land Act* (18 of 1936).

The *Development Trust and Land Act* 18 of 1936 expanded African reserves by an additional 6.2 million hectares, building on those initially established under the *Natives Land Act* 27 of 1913 (Hay, 2012). Legally, the African population remained restricted from occupying or owning land outside these designated areas (Kruger, 2007). The land allocated to Africans grew from an initial 7% to about 13% of the total land (Hay, 2012). Still, this increase was not sufficient to enable significant socio-economic progress for this group, which made up over 70% of the population. The South African Native Trust (SANT), later renamed the Bantu Trust and then the Development Trust, was created to acquire land for African communities (du Pisani, 2011). However, it faced strong resistance and was hampered by bureaucratic delays. The land acquisition process moved slowly, as much of the land was of poor quality and attempts to reclaim 'ancient tribal land' failed (Hay, 2012).

(vii) *Natives Laws Amendment Act* (46 of 1937).

The *Natives Laws Amendment Act* 46 of 1937, also known as the *Black Laws Amendment Act*, amended the *Natives Labour Regulation Act* 15 of 1911. The Act regulated the movement and distribution of the urban Black population (Baldwin, 1975). It aimed to preserve the racial homogeneity of metropolitan areas by implementing measures to restrict Black presence (Lewin, 1939). The Act imposed restrictions on Black residents of urban areas, limiting their numbers to what was deemed necessary to satisfy 'reasonable labour demands'. Consequently, it not only worsened poverty and inequality by restricting economic opportunities for Black individuals but also ensured that the White population maintained dominance over most of the wealth and resources (Hall, 2014). Additionally, the Act limited Black individuals' ability to acquire land in urban areas without prior government approval. The establishment of facilities, including religious and educational establishments, specifically for Black communities living in urban areas beyond townships, required the Minister of Native Affairs' approval (Baldwin, 1975). To achieve its objectives, the state passed laws that strengthened the requirement for residents to carry

identification documents, serving as a primary mechanism for maintaining white supremacy (Shear, 2013).

(viii) *Group Areas Act* (41 of 1950).

The *Group Areas Act* 41 of 1950 was enacted to systematically enforce residential segregation by designating specific geographic areas for individuals classified as White, Coloured, Indian, and Black. This legislation played a crucial role in institutionalising apartheid, which began in 1948 (Isaacs-Martin, 2015). As a result, urban areas were planned to be divided into distinct zones based on racial segregation, where residency and employment opportunities were limited to specific racial groups. The establishment of group areas aimed to secure exclusive ownership and residence for each racial group (Maharaj, 2024). The implementation of statutory provisions criminalised the occupation or ownership of land by individuals of a particular racial group when such land had been officially designated for a different racial group, as per the proclamation (Maharaj, 2024). Non-White individuals were systematically relocated to regions with limited economic resources, worsening conditions of poverty and deepening socio-economic disparities. This displacement affected numerous communities, especially in the urban areas of Cape Town and Durban, disrupting cultural and social structures (White, 1998). Although affected communities and organisations, including Indian political groups in Durban, opposed the Act, the government did not address their concerns. The initiation of racial integration in some areas of Johannesburg led to policy change recommendations, driven by the unsustainable nature and economic consequences of the existing legislative framework (Cochrane & Chellan, 2017).

(ix) *Prevention of Illegal Squatting Act* (52 of 1951).

The *Prevention of Illegal Squatting Act* 52 of 1951 authorised the Minister of Native Affairs to enforce the removal of individuals of African descent from public or private lands (Smith, 1996). This legislation was used systematically to reinforce racial segregation by mandating the forced relocation of communities identified as Coloured, Indian, and Black from areas designated solely for White populations (Ramballi & Maharaj, 2024). The Act gave officials extensive powers to evict residents from unlawful settlements and relocate them to designated sites such as 'resettlement' or 'emergency camps'. Informal settlements were regarded as undesirable and illegal, prompting the Act to serve as a reactive measure that did not contribute positively to their planning. It worsened South Africa's housing crisis and social inequalities through involuntary relocations and land seizures (Boggenpoel & Mahomed, 2024). Its harsh measures resulted in widespread human rights abuses and were criticised for prioritising landowner rights over the needs of vulnerable populations.

(x) *Bantu Authorities Act* (68 of 1951).

The *Bantu Authorities Act* 68 of 1951 created 10 ethnically designated territories, known as Bantustans or Homelands, to enable the Black population to exercise self-governance. This act marked the first legal step towards implementing the government's policy of segregated development (Klein, 1987). It facilitated the formation of Regional and Territorial Authorities, each explicitly assigned to a different ethnic group within the designated reserves. To some extent, traditional leaders of African communities became representatives of the White government. However, the act reduced Black political influence by abolishing the Natives' Representative Council and promoting separate language groups (Ehrenreich-Risner, 2022). Despite assurances of self-government, Bantustans faced economic and political challenges due to underfunding and dependence on the White government. The strategic appointment of traditional leaders to support apartheid objectives undermined legitimate authority structures and destabilised governance, thereby deepening ethnic divisions (Pollock, 1969).

(xi) *Physical Planning Act* (88 of 1967).

The *Physical Planning Act* 88 of 1967 was national legislation intended to coordinate environmental planning and manage the Republic's resources. However, its main impact was the national government's interference in urban development (Smith, 1996). The act is straightforward and addresses only four key measures, all of which focus solely on land-use regulation (van Wyk, 2013). Its objectives include controlling the zoning and subdivision of land designated for industrial use, allocating land for specific purposes, establishing controlled areas, and creating Guide Plans. The first three objectives stem from the racial policies enacted during the apartheid era, which imposed restrictions on non-White communities within urban areas, enforced the *Group Areas Act*, and promoted the development of decentralised regions (Berrisford, 2011).

(xii) *Physical Planning Act* (125 of 1991).

The Republic was divided regionally to facilitate the implementation of national development strategies, stimulate regional economic growth, improve urban planning, and address related socio-economic issues (Berrisford, 2011). This division aims to promote the nation's coherent and structured physical development. The period from 1991 to 1994 marked the start of the transition from apartheid to democratic systems (Lemon, 2016). During South Africa's transition to democracy, the enactment of the *Physical Planning Act* 125 of 1991 marked a shift in the political landscape, signifying progress towards more comprehensive and inclusive planning. Despite operating within a framework that did not fully embody democratic principles, the Act aimed to reduce certain spatial inequalities caused by apartheid (Smith, 1996). The legislation established

comprehensive frameworks for future spatial development and enabled the systematic organisation of the physical environment at both national and regional levels. The 1991 Act introduced more flexible, normatively oriented planning concepts, although it remained based on a centralised structure (Berrisford, 2011). During the dismantling of apartheid, South Africa enacted the 1991 Act amidst a period of political transition. This legislation reflected a growing acknowledgement of the necessity for spatial planning reform to promote a more democratic and equitable society (Lemon, 2016).

(xiii) *Less Formal Township Establishment Act* (113 of 1991).

The *Less Formal Township Establishment Act* 113 of 1991 was enacted to address the housing crisis in South Africa, particularly in urban areas where informal settlements were expanding due to rapid urbanisation and inadequate housing policies (Smith, 1996). The legislation aimed to accelerate the development of townships by integrating informal settlements into structured urban planning frameworks (Berrisford, 2011). This initiative sought to simplify bureaucratic procedures and create a legal framework to support the development and official recognition of these settlements (Berrisford, 2011). The Act sought to give residents of informal settlements access to basic services and legal recognition previously denied by more stringent regulatory frameworks, by facilitating the establishment of townships through less formalised processes (Smith, 1996). However, the Act alone was insufficient to effectively address the issues related to the growth of informal settlements, mainly because of the absence of coherent long-term planning legislation (Smith, 1996).

(xiv) *Abolition of Racially Based Land Measures Act* (108 of 1991).

The *Abolition of Racially Based Land Measures Act* 108 of 1991 aimed to repeal legislative measures such as the *Natives Land Act* and the *Group Areas Act*, which restricted land ownership and settlement on racial grounds (van Wyk, 2013). By removing legal barriers to equitable land distribution, the act was a vital precursor to subsequent land reform initiatives. Consistent with the post-apartheid Constitution's provisions for restitution, redistribution, and tenure reform, the act marked an essential phase in the land reform programme (Dlamini, 2013). To address land claims and rectify historical injustices, the act established the Land Rights Restitution Commission and the Land Claims Court (Mbao, 2004).

7.2.5 Spatial Planning

- **Strategic Planning: Policy Framework**

During the transition to a more inclusive governance system, strategic planning was used to address the socio-economic disparities caused by colonial and apartheid policies (Inman & Rubinfeld, 2013). As a result, rigid, hierarchical planning mechanisms were replaced with more flexible, participatory approaches to foster integration.

(i) *National Physical Development Plan (NPDP)* of 1975.

The *NPDP* (1975) aimed to optimise resource allocation and implement a systematic framework for land use and development across the country. Measures were introduced to reduce regional disparities by fostering balanced economic growth and addressing the needs of underdeveloped regions (Fair, 1975). The objective was to achieve balanced regional development by identifying growth points and growth poles. Growth points were identified within the homelands, while growth poles were characterised by nearby urban areas with development potential (Lemon, 1991). The initiative proposed implementing different development strategies tailored to urban and rural contexts. The *NPDP* (1975) failed to consider industrial potential, population density, and socio-economic patterns, resulting in geographically isolated development (Drewes & van Aswegen, 2013).

(ii) *Good Hope Plan (GHP)* of 1981.

The *GHP* (1981) outlined a set of guidelines for industrial development, the result of a collaborative discussion between the public and private sectors. It identified 48 industrial development sites and aimed to establish alternative locations for industrial clusters (Stemmet, 2011). The objective was to reduce the influx of migrants into metropolitan areas by adopting a differentiated strategy that emphasises smaller population centres. Consequently, 11 deconcentration points were strategically created to ease demographic pressures in urban areas (Isaacs, 2022). The initiative sought to alleviate the overflow of metropolitan populations by promoting development near homelands, strategically close to cities, to address urban concentration issues. To combat poverty and decrease reliance on urban areas, the initiative aimed to support economic growth within the homelands (Maasdorp, 2009).

(iii) *Regional Industrial Development Programme (RIDP)* of 1991.

The aim of the *RIDP* (1991) was to reorganise the regional industrial strategy by shifting its focus from socio-political objectives towards a primarily economic approach. This transition from the

apartheid-era goal of creating economically self-sufficient states to regions with potential for industrial growth was triggered (Wilsenach & Ligthelm, 1993). The programme emphasised fostering the development of an integrated Southern African economy through initiatives targeting transport, housing, and electricity subsidies, along with costs related to land acquisition, construction, and re-establishment (Hart & Todes, 1997). It was characterised by a market-focused framework that aimed to promote regional development and uplift underdeveloped areas (Nel, 2016). The *RIDP* (1991) was designed to strengthen industrial capabilities in both secondary cities and metropolitan regions through targeted capital investments. Furthermore, this strategic approach aimed to encourage regional economic development (Wilsenach & Ligthelm, 1993).

- **Statutory Planning: Development Control**

During the apartheid era, statutory planning was used to uphold the political and economic dominance of the White minority and to enforce racial segregation policies.

- (i) *Town Planning and Townships Ordinance of Transvaal* (11 of 1931).

The complexity of urban development increased when town planning became a provincial responsibility in 1925. Transvaal introduced the first provincial ordinance in 1931, incorporating land use into urban planning, followed by similar ordinances in the other three provinces (Maharaj, 2020). Under these newly established provincial ordinances, land-use regulation was facilitated through the creation of town planning schemes. These schemes serve as a regulatory framework for statutory land-use zoning, functioning as legal instruments akin to municipal by-laws (Lemon, 2021). Additionally, municipalities gradually developed town planning schemes during the 1930s; however, progress was delayed by the outbreak of World War II from 1939 to 1945, and the first scheme was not implemented until 1946 (Maharaj, 2020). The process of formulating town planning schemes was recognised as lengthy and challenging due to a lack of local expertise and experience with this mechanism. During the preparation of these schemes, land-use zoning mainly relied on pre-existing developments or on land uses permitted or not explicitly prohibited under the property's title conditions (Bronstein, 2015). Consequently, the zoning map within the town planning scheme primarily formalised existing land use or development rights and did not include proposals for future land uses.

- (ii) *Town Planning and Townships Ordinance of Transvaal* (25 of 1965).

The fundamental elements of urban planning, specifically the creation of townships and the implementation of town planning schemes, were upheld in the 1965 ordinance, but a notable new provision was added (Baranowska, 2009). This provision, known as 'betterment', is a concept of historic significance in British urban planning. It refers to a levy or fee imposed by the government

on improvements to property that enhance its value (Maharaj, 2020). In South Africa, the 'betterment' levy was introduced to provide municipalities with additional funding for engineering infrastructure.

(iii) *Town Planning and Townships Ordinance of Transvaal* (15 of 1986).

The 1986 Transvaal ordinance was enacted to regulate urban areas designated for White populations, effectively abolishing all endowment payments except those allocated to parks and open spaces (Lemon, 2021). The Commission argued that such payments unnecessarily increased the costs of township land and recommended that they be funded through general revenue (Baranowska, 2009). The parks, regarded as essential, retained their requirement for endowment. When parks could not be provided, an endowment payment was required, with a specific formula determining the amount. This ordinance significantly improved urban planning by detailing development procedures and delegating planning authority to municipal bodies (Berrisford, 2011).

Figure 7.4 visually shows the pre-1994 planning framework in South Africa.

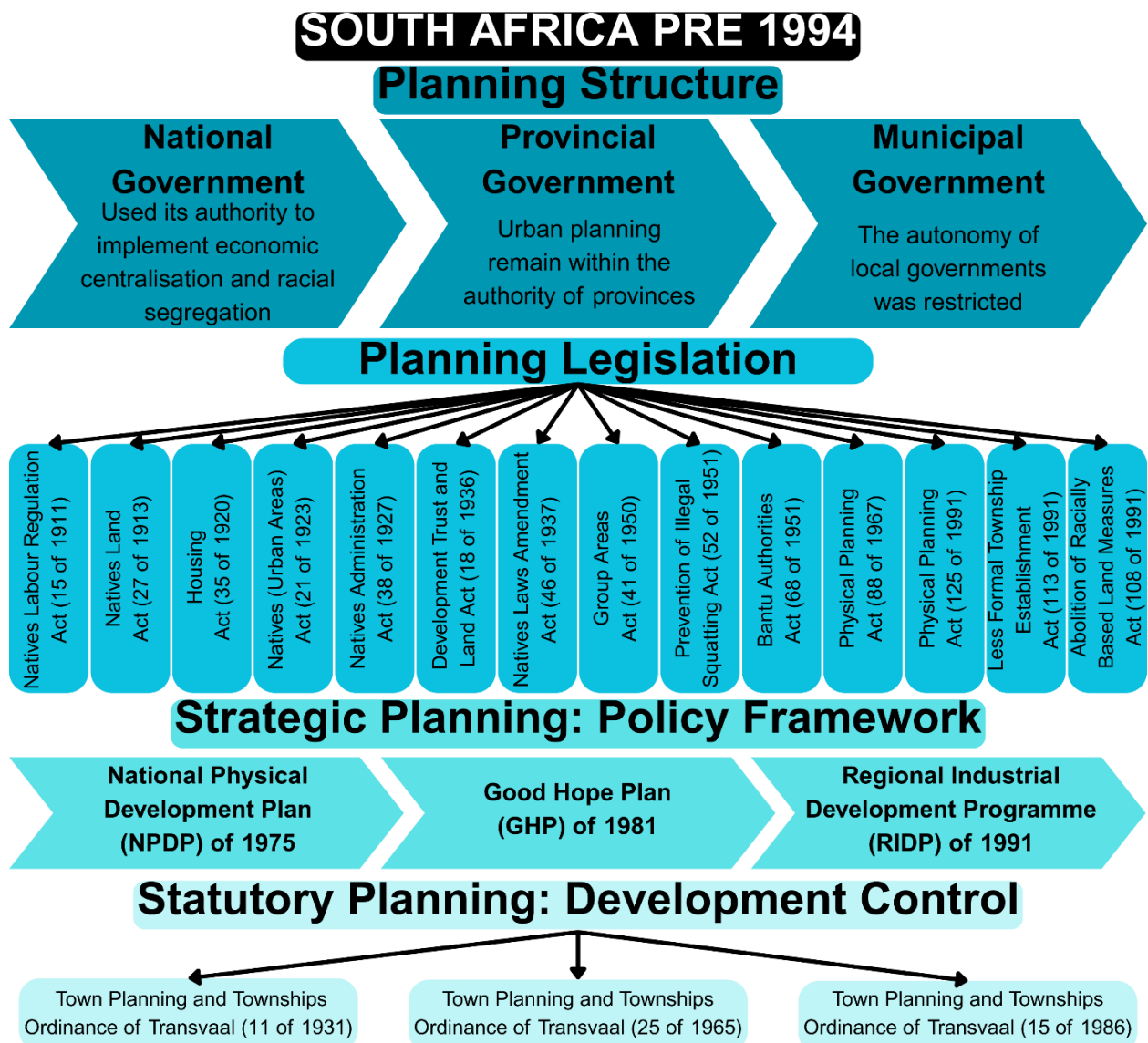


Figure 7.4: Pre-1994 Planning Framework of South Africa

Source: Own construction, based on Oakenfull (2021)

7.2.6 Implementation and Challenges

Spatial planning practices during apartheid were fundamentally shaped by the era's social, political, and economic structures, which posed significant challenges to implementation. Decision-making in urban planning was significantly affected by political interference. The concerns of marginalised communities were subordinated, and private developers frequently benefited from political support (Moodley, 2019). The process of spatial transformation was hindered by a lack of coordination across levels of government and sectors, resulting in an unsupportive institutional environment (Pieterse, 2006). Additionally, the enduring apartheid-era planning legislation presented a substantial obstacle.

Furthermore, despite efforts to reform, the legal system remained essentially unchanged (Berrisford, 2011). The absence of a constitutional framework made reform of planning legislation even more challenging, as there was no delineation of legislative powers over land use and planning (Berrisford, 2011). The creation of integrated and compact cities presents significant challenges owing to the legacy of apartheid, which resulted in cities characterised by unequal distribution and socio-spatial contrasts (Horn, 2020). Demographic trends and urban sprawl further mitigated this process. Consequently, social and economic inequalities persisted; peripheral and township areas continued to lack adequate services and infrastructure, thereby exacerbating disparities within these regions.

To encompass these regions, the city boundaries were expanded; however, this expansion merely introduced additional challenges in managing these diverse areas (Rogerson, 2023). Progress in addressing the informal sector and establishing appropriate indicators for monitoring spatial plans has been minimal, and efforts to incorporate sustainability principles and coordinate infrastructure development with spatial planning remain limited (du Plessis, 2014). The legacy of apartheid has left an urban environment that complicates the implementation of shared urban space initiatives; furthermore, patterns of urbanisation have been significantly shaped by racial segregation and discriminatory influx controls (Lemon, 2016). Planning methodologies have predominantly been top-down, with limited public engagement (Lemon, 2016).

7.3 Spatial Planning in South Africa: Post 1994

After the end of apartheid in 1994, South Africa began to reform its spatial planning practices to address the historical legacy of apartheid while promoting social justice, economic development, and geographical integration (Moyo *et al.*, 2021).

7.3.1 Administrative structure

Following the first democratic election in 1994, a strategic initiative was undertaken to establish an administrative structure characterised by democracy (Tapscott, 2008). The apartheid regime created a disjointed administrative framework, marked by racial segregation and operational inefficiencies, which persisted as a legacy of its policies (Landsberg, 2018). After 1994, South Africa underwent territorial reconfiguration, resulting in the establishment of nine provinces. This restructuring replaced the previous four-province system and was crucial in creating a democratic South Africa under a new constitution (Peleg, 2022).

South Africa operates as a constitutional democracy with a unitary state system within a parliamentary framework, in which the legislative, executive, and judicial branches have separate

and independent powers (Maloka, 2007). As head of state and head of government, the president primarily oversees the government's operations (Taruvunga, 2025). The country's bicameral parliament comprises the National Assembly, with 400 members, and the National Council of Provinces, with 90 members (Mathekga, 2006).

The formation of the national executive branch begins with the President, who has the authority to appoint the Deputy President and Cabinet Ministers from among the current members of the National Assembly (Tapscott, 2008). Elections occur at both the national and provincial levels every five years. Furthermore, the National Treasury, led by the Minister of Finance, manages and oversees public expenditure (Taruvunga, 2025). Figure 7.5 below illustrates the administrative structure of South Africa.

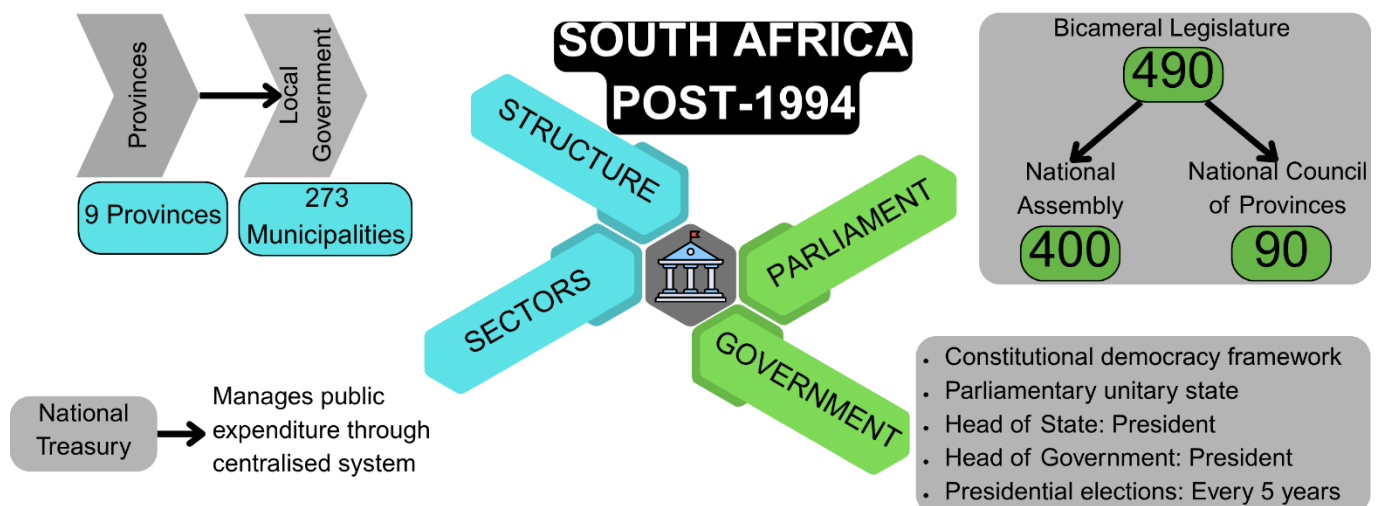


Figure 7.5: Post-1994 Administrative Structure of South Africa

Source: Own construction, based on the *Constitution of South Africa* (1996)

7.3.2 Spatial Planning Evolution

The impacts of racial discrimination and apartheid policies were clear, resulting in the widespread rejection of planning practices characterised by discrimination in 1995. These impacts mainly manifested as distorted and inadequate land-use patterns within urban areas (Maharaj, 2020). As a result, early democratic governance focused on urban development and land-use arrangements (Maharaj, 2020). The development and implementation of an innovative strategy for planning and developing metropolitan regions has been recognised as critically important (Mokoena *et al.*, 2019). As early as 1995, new national legislation was enacted as an initial, provisional step towards reforming land-use planning and development (Berrisford, 2011).

Furthermore, a national planning commission was established to advise the government on land-use planning (Musvoto, 2014). However, the extensive expansion of planning legislation has led to a fragmented and incoherent urban planning framework, creating a complex environment for planners and developers (Mokoena *et al.*, 2019). The challenge was to balance a national planning system with municipal authority. Reform was essential to standardise planning across the country, avoid differing provincial laws, and ensure coordination at the national, provincial, and municipal levels (Oakenfull, 2021).

Constitution of the Republic of South Africa (1996).

The *Constitution of South Africa* (1996) is a crucial document that marks the end of apartheid and the beginning of a constitutional democracy. It aims to reconcile historical divisions and establish a society founded on equality and freedom by upholding fundamental human rights (Chenwi, 2006). To safeguard the stability of the Constitution's principles and rights, its amendments are deliberately difficult to implement. Any action that contravenes the Constitution is deemed unlawful, since it is the supreme law. This ensures that all actions are subject to judicial review, meaning neither individuals nor entities, including the state, are above the law (Liba & Coetzee, 2013). The Constitution underscores the importance of transparency and access to information, both of which are vital to effective spatial planning. Section 32 of the *Constitution of South Africa* (1996) affirms the right to knowledge and promotes public participation in planning processes. This transparency encourages collaboration between the public and private sectors, enhancing the exchange of environmental data essential for informed decision-making in spatial planning (Ferreira-Snyman & du Plessis, 2002). Section 25 addresses property rights, authorising the state to regulate land use without compensation, provided the regulation is not discriminatory or excessively unjust. This provision ensures that spatial planning accommodates community needs by enabling the government to implement land-use and environmental protection strategies (Van der Walt, 2011). Section 26 affirms the right to adequate housing, significantly shaping spatial planning by requiring government action to facilitate housing provision (Chenwi, 2006).

7.3.3 Planning Structure

Since the end of apartheid in 1994, South Africa's spatial planning framework has undergone substantial changes. These reforms primarily aim to dismantle apartheid-era spatial planning and to foster sustainable, equitable spatial development:

- (i) *National Government:* With the implementation of *SPLUMA* (2013), the national government plays a vital role in spatial planning by establishing a national framework for development (Nel, 2016). This framework mandates the creation of Land Use

Management Systems (LUMS) and Spatial Development Frameworks (SDFs) to address and improve the problems caused by fragmented, unsustainable settlement patterns. To ensure coherence and integration in planning efforts, the national government is responsible for developing comprehensive frameworks and policies that guide spatial planning across all tiers of government (Oranje & Huyssteen, 2011). The *National Development Plan (NDP)* and the *National Spatial Development Framework (NSDF)* serve as strategic documents aimed at transforming the spatial logic of apartheid and revolutionising the country's spatial economy (Oranje, 2010). These frameworks guide spatial planning, seeking to reorganise and optimise the spatial arrangement of economic activities (*SPLUMA* of 2013).

- (ii) *Provincial Government:* Schedule 1 of the *Spatial Planning and Land Use Management Act* 16 of 2013 authorises provincial governments to implement legislation on matters subject to municipal decision-making (Nel, 2016). To adequately address the specific needs and challenges of different regions, provincial governance structures must ensure that spatial planning practices align with national regulatory frameworks (Turok, 2010). Additionally, provincial governments are responsible for strategically allocating infrastructure expenditure to promote effective regional development (Lodi, 2006). Furthermore, the provincial government must collaborate with both national and local government entities to effectively oversee the constitutional allocation of authority (*SPLUMA* of 2013).
- (iii) *Municipal Government:* The *Constitution of South Africa* (1996) restructured municipal governance by establishing metropolitan, district, and local municipalities. The introduction of these complexities into urban planning has elevated municipalities from a previously subordinate role, thereby granting them additional responsibilities (Chenwi, 2006). According to Schedule 4B of the *Constitution of South Africa* (1996), municipalities are granted executive authority over local governance, including municipal planning. Court rulings have emphasised the distinction between legislative and executive authorities in spatial planning, supporting local government's role in rezoning and land-use planning (Liba & Coetzee, 2013). Therefore, under Section 156(1) of the *Constitution of South Africa* (1996), municipalities are authorised to exercise authority over administrative areas (Ferreira-Snyman & du Plessis, 2002). Chapter 3 of the *Spatial Planning and Land Use Management Act* 16 of 2013 requires municipalities to establish procedures, formats, and criteria for assessing land-use and development applications. Chapter 6 of *SPLUMA* (2013) states that the local municipal planning tribunal must approve all land development initiatives before proceeding (Nel, 2016). Consequently, the implementation of planning

practices is intended to be a function of municipal decision-making processes (*SPLUMA* of 2013).

7.3.4 Planning Legislation

To counteract the spatial disparities resulting from apartheid legislation, various new spatial planning legislations were introduced (Berrisford, 2011).

(i) *Development Facilitation Act (DFA)* (67 of 1995).

The *Development and Facilitation Act* 67 of 1995 introduced an alternative urban planning process to accelerate land development approvals and transform apartheid-era planning by including previously excluded communities (Rigby & Diab, 2003). It established development tribunals, transferring decision-making and conflict-resolution powers to the provinces. These tribunals have the authority to override legal statutes that hinder development projects. Although their decisions are final, there is still a possibility of appeal (Berrisford, 2011). The *DFA* (1995) required municipalities to create land development objectives (LDOs) for strategic planning and tribunal guidelines. The *DFA* (1995) notably reduced the time needed for application approval (van Wyk, 2010). The timeframe has been shortened to 5 months, compared with the initially prescribed 2-year period mandated by the provincial ordinances (*DFA* of 1995).

(ii) *Municipal Demarcation Act* (27 of 1998).

The *Municipal Demarcation Act* 27 of 1998 provides the Municipal Demarcation Board (MDB) with a framework for defining municipal boundaries, guided by factors such as population density, economic viability, and the urgent needs of service delivery (Jeeva *et al.*, 2022). To enhance administrative efficiency and service delivery, the act aims to establish municipalities that accurately reflect the socio-economic conditions of the communities they serve. The consolidation of municipalities, reducing the total from 980 to 8 metropolitan, 52 district and 213 local municipalities, aligns with the constitutional directive to modernise local governance structures (Van der Walddt, 2002). Many municipalities remain excessively large and lack the financial resources needed for effective governance, resulting in substandard service provision. The demarcation process, known for its inefficiencies and poor service delivery, remains complex and often causes public protests (Van der Walddt, 2002).

(iii) *Municipal Structures Act* (117 of 1998).

The *Municipal Structures Act* 117 of 1998 facilitated the organisation of local, district, and metropolitan municipalities to ensure a comprehensive approach to regional governance (Van

der Waladt, 2002). The governance system aims to improve accountability and public participation by requiring municipalities to operate under an elected council framework (Thornhill, 2008). The effectiveness of service delivery and accountability mechanisms may be significantly undermined by widespread misconceptions about the distinct functions and responsibilities of district and local governments (Magagula *et al.*, 2019). Many municipalities struggle to provide services despite the existing framework, raising concerns about the effectiveness of the act's cooperative governance model.

(iv) *National Environmental Management Act (NEMA)* (107 of 1998).

Integrating environmental considerations into all decision-making processes is crucial, and the *National Environmental Management Act* 107 of 1998 underscores the importance of collaborative environmental governance. The act addresses historical inequalities in environmental access and recognises the rights of previously marginalised populations (Couzens, 1999). Section 24G of *NEMA* (1998) is the sole example of an environmental administrative penalty in the South African legal system and permits retrospective authorisation of operations that commenced without prior compliance with the law. Concerns that this section might undermine the objectives of environmental impact assessments, which are essential for protecting environmental rights, have sparked academic debate (Hall, 2022). Scholars contend that provisions such as Section 24G could facilitate further environmental degradation, thereby contradicting the act's protective aims (*NEMA* of 1998).

(v) *Municipal Systems Act (Systems Act)* (32 of 2000).

Municipalities must develop an Integrated Development Plan (IDP) that includes a Spatial Development Framework (SDF) for future land-use planning within their area (Phago, 2009). The IDP is a strategic blueprint that municipalities are required to create. It serves as a plan for coordinating and integrating all municipal activities, administration, and functions (Subban & Theron, 2012). The SDF also provides basic land-use management guidelines. The *Municipal Systems Act* 32 of 2000 sets out the responsibilities of local governments in planning, reaffirming their authority to enforce zoning and land-use regulations, which are essential for effective spatial planning coordination (Maake, 2016). The *Systems Act* (2000) promotes coherence across different levels of governance by establishing a structured system for collaboration among national, provincial, and local government bodies (Phago, 2009). It mandates directing public resources to sectors needing improvement and restructuring by aligning municipal capital expenditure plans with spatial development frameworks.

(vi) *Intergovernmental Relations Framework Act* (13 of 2005).

The *Intergovernmental Relations Framework Act* 13 of 2005 aims to ensure that different government branches operate with integrity by aligning their activities and legislative initiatives (Baatjies, 2009). The act establishes a legal framework to support the creation of intergovernmental organisations and the development of mechanisms for dispute resolution. However, critics argue that the act has not fully achieved its intended objectives because of the national government's dominant influence over provincial administrations, effectively reducing them to mere implementers of national policies (Malherbe, 2006). The act's effectiveness has been examined, taking into account capacity constraints within provincial administrations and bureaucratic inefficiencies.

(vii) *Spatial Planning and Land Use Management Act (SPLUMA)* (16 of 2013).

The *DFA* (1995) has been repealed, and *SPLUMA* (2013) now serves as the primary framework for the newly established planning system. Chapter 2, Section 7 of the *Spatial Planning and Land Use Management Act* 16 of 2013 outlines relevant development principles for spatial planning, land development, and land use management (van Wyk, 2017). These principles, including social justice, spatial sustainability, efficiency, spatial resilience, and good governance, clearly define urban planning goals. In development decision-making, *SPLUMA* (2013) explicitly sets out the factors that must be considered (Joscelyne, 2015). These include public interest, constitutional directives, the specific facts and circumstances of each development application, the rights and obligations of those affected, as well as engineering services, social infrastructure, open spaces, and any other prescribed elements (de Visser & Poswa, 2019). *SPLUMA* (2013) resembles provincial planning ordinances but differs in two key aspects. First, it introduces spatial development frameworks for future land use planning. Second, it does not separate township establishment from zoning (Nel, 2016). Although apartheid legislation has been abolished, social exclusion issues remain, mainly due to residual geographic imprints (*SPLUMA* of 2013).

(viii) *Municipal Fiscal Powers and Functions Amendment Act* (4 of 2024).

The *Municipal Fiscal Powers and Functions Amendment Act* 4 of 2024 amends *SPLUMA* (2013) and related legislation by introducing innovative mechanisms for development assessments. It also facilitates the formulation of agreements for external engineering services and adjusts financial instruments to improve the implementation of spatial planning objectives (Fuo, 2023). It aims to increase municipalities' self-governance by granting them expanded authority over their financial policies and revenue-generation mechanisms. This forms part of a broader initiative to align local governance frameworks with the requirements outlined in Chapter 7 of the *Constitution of South Africa* (1996). This chapter establishes a systematic framework for developing and strengthening local government structures (Bronstein & Glaser, 2023). To support municipalities'

effective management of financial resources and obligations, the legislation seeks to clarify their financial powers. The initiative also aims to improve the allocation of responsibilities within local government by reducing redundancies and inefficiencies in service delivery processes (Fuo, 2023). In line with South Africa's progressive development approach, the act reinforces municipalities' statutory mandate to promote socio-economic advancement.

7.3.5 Spatial Planning

- **Strategic Planning: Policy Framework**

Strategic planning provides a fundamental framework for long-term development, primarily focusing on improving sustainability and spatial equity.

(i) *Reconstruction and Development Programme (RDP) of 1994.*

The division of urban and rural areas, along with prevailing social inequalities, necessitated the initiation of this programme. The *RDP* (1994) aims to provide disadvantaged individuals with access to basic amenities such as housing, potable water, electricity, and sanitation facilities, thereby constituting a basic-needs initiative designed to improve their living standards (Kricková, 2015). The framework is a unified socio-economic policy intended to mobilise the nation's people and resources to build a non-racial, non-sexist society (Cameron, 1996). The *RDP* (1994) is based on six key principles: integration and sustainability; community orientation; promoting national stability and security; facilitating nation-building; linking reconstruction with development; and promoting South Africa's democratisation (Engelhard *et al.*, 1997). The initiative emphasised the importance of education and skill development in empowering individuals and communities, improving human capital, and reducing unemployment rates (Cameron, 1996). Land reform was prioritised in the *RDP* (1994) as a significant transformation essential to correcting disproportionate land ownership structures and to allocating land to individuals displaced during the apartheid era (Iltmann, 2003). Within the context of the new democratic era, it was imperative to foster citizens' active participation and a sense of proprietorship (*RDP* of 1994).

(ii) *Urban Development Framework (UDF) of 1997.*

The *UDF* (1997) focuses on reconnecting municipal authorities with civil society. It aims to align spatial and economic planning so that integrated planning becomes the main guide for urban development projects rather than allowing urban growth to dictate the planning process (Pieterse, 2004). The initiative clarifies relationships across different levels of governance and facilitates changes in land management through land redistribution and tenure reform (Pieterse, 2006). The strategy for implementing this framework includes four main programmes: improving housing and

infrastructure; establishing institutions dedicated to service delivery; promoting urban economic development; and integrating urban environments (Mokoena & Sebola, 2020). At that time, demographic conditions featured a large, rapidly expanding population alongside a lively and dynamic civil society. Socio-economic disparities and poverty remained persistent, placing significant financial burdens on local governments (Pieterse, 2006). The urban development framework adopted a more flexible approach to planning and zoning regulations, emphasising the integration of mixed land uses and encouraging higher-density development (Mokoena & Sebola, 2020). The framework acknowledged that reconstructing and enhancing township infrastructure is vital for fostering communities that are both safe and liveable (*UDF* of 1997).

(iii) *Rural Development Framework (RDF)* of 1997.

The *RDF* (1997) emphasises strengthening the rural economy as a strategic measure to mitigate the adverse effects of urbanisation, while also highlighting the crucial importance of rural areas. South Africa's rural regions face multiple challenges related to employment and poverty (Olivier *et al.*, 2010). Rural development is characterised by a multi-sectoral approach that requires coordinated efforts across sectors. Significant economic difficulties and limited access to infrastructure have delayed the delivery of essential services in these areas (Olivier, 2004). Consequently, developing cost-effective infrastructure is vital; however, it is also necessary to evaluate potential environmental impacts and effects on vulnerable natural resources. Therefore, rural development demands strategic investments in infrastructure alongside efforts to improve employment and income-generating opportunities, all while ensuring the preservation of resources (Popa *et al.*, 2024). Nonetheless, the rural development framework faces substantial obstacles in meeting the prerequisites for successful rural progress (Karriem & Hoskins, 2016). Allocating financial resources and addressing the specific needs of communities remain significant challenges within the scope of rural development initiatives (*RDF* of 1997).

(iv) *Spatial Development Initiatives (SDI)* of 1999.

The *SDI* (1999) is a strategic intervention designed to enhance economic potential and promote new investment and employment opportunities within specific geographic regions (Bek & Taylor, 2001). Its primary aim is to systematically remove barriers to investment and identify innovative investment prospects within the designated areas. *SDI* (1999) serves as an integrated planning tool to stimulate and increase investment in regions characterised by underdevelopment but that exhibit significant potential for economic and infrastructural growth (Rogerson, 2001). As a result, these initiatives are carried out in any area with sufficient underused potential, provided there is political will to foster both intergovernmental and intragovernmental collaboration (Hall, 1999).

Efforts to identify investment opportunities in specific areas will be pursued to develop business prospects, thereby supporting investment-led growth (*SDI* of 1999).

(v) *Green Paper on Development and Planning* of 1999.

The disjointed planning framework inherited from the apartheid regime required the development of the green paper. The aim was to create an integrated spatial planning framework that promotes rural and urban development (Jones, 2002). This framework was designed to ensure effective coordination among national, provincial, and local government entities. Responsibility for managing land-use changes and integrating planning through LUMS has been assigned to local government authorities (Odendaal, 2007). This process supports the decentralisation of authority and clearly defines the roles of various governmental bodies within the planning framework. The national government's responsibilities included formulating the legal framework that governs planning activities and establishing standards and principles to guide national planning processes (Coetzee, 2012). Facilitating spatial decision-making processes between different national departments was also a duty mandated by the national government. The national government extended assistance to the provincial governments, and both levels of government were expected to coordinate their efforts. Provincial authorities were tasked with developing regional legislation and supporting local government bodies in implementing planning decisions (Sowman & Brown, 2006). Local government authorities were responsible for developing IDPs within their jurisdictions and were required to determine planning needs through a participatory approach. The objective of the *Green Paper* (1999) was to speed up the approval process for development projects (*Green Paper* of 1999).

(vi) *White Paper on Spatial Planning and Land Use Management* of 2001.

To reconcile economic, social, and environmental objectives, the *White Paper* (2001) emphasises the importance of comprehensive land-use planning (Cohen, 2008). The initiative promotes collaboration among sectors involved in land management to meet stakeholders' needs and ensure the sustainable use of resources for future generations (Nel, 2016). The legislation highlights the importance of understanding socio-spatial dynamics and encourages planners to consider the complexities of urban environments. Recognising the need for efficient planning that incorporates market dynamics and economic factors, the *White Paper* (2001) supports integrating infrastructure development with spatial planning (Todes, 2008). This connection is essential to facilitating sustainable urban development and optimising the use of urban spaces. Consequently, the principles outlined in the *White Paper* (2001) include the sustainable management and utilisation of resources, an equitable distribution among stakeholders, efficient allocation and use, and the integration of various planning aspects, all underpinned by a framework of fair and

effective governance (Todes, 2008). Local government is considered the most vital domain in the decision-making process.

(vii) *National Spatial Development Perspective (NSDP)* of 2006.

The *NSDP* (2006) supports decision-making at lower levels of government by providing a structured framework. It offers investment guidelines and serves as an organisational tool for spatial planning initiatives (Oranje *et al.*, 2009). The framework combines top-down and bottom-up strategies in spatial planning and is intended for an annual review. The goal was to promote rapid, sustainable, and equitable economic growth to reduce poverty. It is the responsibility of government entities to ensure the delivery of essential services to everyone (Oranje & Huyssteen, 2011). Additionally, it has been recognised that financial resources should be strategically allocated to sectors that either stimulate economic growth or have significant potential for such development (Todes, 2008). The *NSDP* (2006) states that initiatives to address historical injustices should focus on individuals rather than geographic locations. Establishing activity corridors and nodes near primary growth centres is an effective way to reduce spatial disparities (Oranje *et al.*, 2009). Both settlement patterns and economic opportunities should be strategically directed towards these areas to maximise development outcomes (*NSDP* of 2006).

(viii) *National Development Plan (NDP)* of 2012.

The *NDP* (2012) suggests that spatial planning will be a vital component in achieving social justice, economic growth, and environmental sustainability by 2030 (Mathews, 2013). The *NSDF* (2022) describes the *NDP* (2012) as a comprehensive strategic blueprint designed to address the triple challenges of poverty, unemployment, and inequality while transforming the nation's spatial economy (Gumata & Ndou, 2020). Integrating collaborative efforts in data collection and analysis involves establishing an observatory to enhance the effectiveness of spatial decision-making. To boost economic opportunities and spatial attractiveness, the *NDP* (2012) prioritises the establishment of regional corridors (Bernstein, 2014). These corridors are expected to facilitate intra-national and interregional economic integration by strengthening urban centres and regional hubs. The *NDP* (2012) aims to develop a comprehensive and practical spatial planning framework by 2030 (Mathews, 2013). The plan includes improving all informal settlements, providing housing near employment centres, and enhancing the quality of public transport systems (*NDP* of 2012).

(ix) *Integrated Urban Development Framework (IUDF)* of 2016.

The *IUDF* (2016) aims to reduce spatial segregation within metropolitan areas by promoting the development of integrated residential projects and mixed-use developments (Verdini & Sirayi,

2021). This involves creating more connected urban environments that ensure fair access to opportunities and services. The *IUDF* (2016) also seeks to boost economic vitality and create jobs by supporting urban economic growth (Nengomasha, 2021). This includes supporting small businesses and ensuring that economically disadvantaged populations can access opportunities for economic progress (Mokoena *et al.*, 2019). The framework incorporates environmental sustainability principles into urban planning, encouraging strategies such as Water Sensitive Urban Design (WSUD) to optimise water management and mitigate the effects of climate change. To decrease inequalities and enhance the quality of life for all city residents, the *IUDF* (2016) emphasises social justice and equity (Verdini & Sirayi, 2021). This means providing fair access to infrastructure and essential services for people from lower socio-economic backgrounds (Fisher-Jeffes *et al.*, 2017).

(x) *National Spatial Development Framework (NSDF) of 2022.*

Future land-use planning integrates SDFs across government levels, moves beyond outdated ordinances, and enhances spatial planning. *SPLUMA* (2013) highlights the importance of implementing comprehensive strategies to coordinate land use and development that adequately address urbanisation trends and climate change (Nel, 2016). As a result, the *NSDF* (2022) serves as a strategic tool that guides spatial planning and development nationwide. In accordance with *SPLUMA* (2013), the *NSDF* (2022) is prepared by the national Minister to coordinate planning activities (Mashiri *et al.*, 2017). Additionally, a detailed national manual has been created to provide thorough guidance for developing SDFs. This ensures local planning aligns with national goals by serving as a foundation for municipal SDFs (Laldaparsad *et al.*, 2013). To promote coherent spatial development, the *NSDF* (2022) is harmonised with the NDP (2012), which sets out overarching developmental objectives, including housing and transportation (*SPLUMA* of 2013).

- **Statutory Planning: Development Control**

Statutory planning acts as a regulatory framework that governs land use and development to promote sustainability and inclusivity.

(i) *Spatial Development Framework (SDF).*

SDFs aim to guide government planning, spatial decisions, and infrastructure investment, significantly influencing municipal planning. Municipal SDFs focus on identifying current and future land-use patterns, including housing areas and development upgrades (Wüst, 2022). They emphasise land-use determination and outline three key aspects of spatial planning: infrastructure placement, a coverage framework for municipal development programmes, and an

implementation plan (Pieterse, 2006). These elements are essential for shaping urban spatial patterns. *SPLUMA* (2013) requires municipalities to plan and deliver infrastructure, set budgets, and actively pursue development objectives, rather than merely regulate. Section 21 of the *Spatial Planning and Land Use Management Act* 16 of 2013 states that municipal SDFs should also identify areas needing detailed local plans, previously produced as precinct or policy plans, which should avoid zoning-like restrictions (Boerboom *et al.*, 2017). SDFs, used as blueprints for land development decisions, have resulted in unintended outcomes. They depict future land uses with precise boundaries but should serve as broad guidelines, especially in changing conditions (*SPLUMA* of 2013).

(ii) *Integrated Development Plan (IDP).*

Municipalities use IDPs as a strategic tool to coordinate development efforts and ensure ongoing, long-term service delivery. The *Municipal Systems Act* 32 of 2000 requires the creation of IDPs, which serve as key instruments that provide municipalities with a structured approach to align their development goals with broader regional, provincial, and national strategies (Pieterse, 2006). This ensures coherence and systematic coordination in planning activities across all levels of government. IDPs help enhance urban integration and sustainable development by coordinating sectoral strategies, such as economic development and transportation (Wüst, 2022). To ensure IDPs accurately reflect the community's needs and objectives, full participation throughout the IDP process is crucial. A participatory approach is vital to addressing the specific challenges faced by diverse communities, especially in rural areas where service delivery has often been inadequate (*Systems Act* of 2000).

(iii) *Land Use Management Systems (LUMS).*

Section 24 of the *Spatial Planning and Land Use Management Act* 16 of 2013 requires each municipality to develop a LUMS in accordance with both national and provincial land-use management regulations. A LUMS is an integrative framework that comprises the methodologies, protocols, and tools used by a municipal authority to regulate and oversee land use and property development within its jurisdiction (Nel, 2016). The primary objectives of a LUMS are to create a transparent, cohesive, and legally sound framework for land-use decision-making; to promote equitable, sustainable, and systematic spatial development; and to align with the Municipal SDF and the IDP (van Wyk, 2017). Each municipality's LUMS comprises several essential components. The primary legal mechanism for regulating land use is the Land Use Scheme (LUS). This is further supported by municipal by-laws that regulate activities such as subdivision, rezoning, consent use, and the submission of land development applications. Institutional frameworks also include enforcement units, appeal agencies, and planning tribunals (Todes,

2008). Additionally, compliance systems are implemented to ensure that developments comply with authorised land-use regulations (*SPLUMA* of 2013).

Figure 7.6 below shows the post-1994 planning framework of South Africa visually.

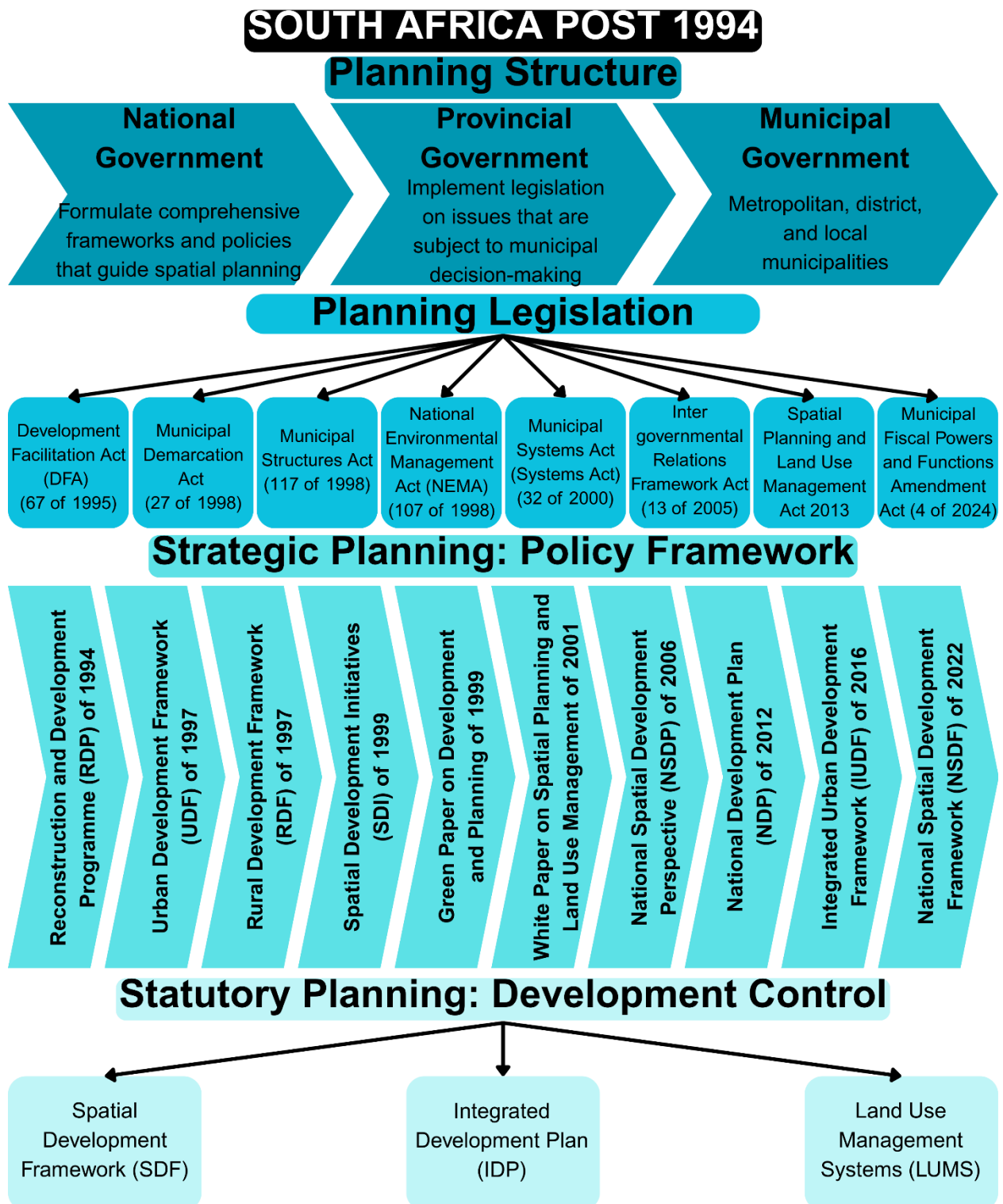


Figure 7.6: Post-1994 Planning Framework of South Africa

Source: Own construction, based on *Constitution of South Africa* (1996)

7.3.6 Implementation and Challenges

The legacy of apartheid has left a fragmented spatial planning system and segregated urban areas in democratic South Africa. Affluent neighbourhoods remain separated from impoverished townships because of the spatial divisions instituted during the apartheid era. Consequently, the destitute majority continues to face limited access to social and economic opportunities (Turok & Watson, 2001). Transport inefficiencies constitute a significant barrier to addressing spatial fragmentation, particularly in the Gauteng province. Therefore, the implementation of innovative transport solutions has been proposed as an effective remedy (Chakwizira, 2020).

The implementation of *SPLUMA* (2013) underscores the need for intergovernmental collaboration across levels of government, thereby complicating spatial planning processes. Collaboration among government entities is vital for addressing climate change mitigation and adaptation within planning frameworks. Given South Africa's ongoing urban housing crisis, it is imperative to address government inefficiencies that may impede the successful implementation of housing initiatives, including zoning restrictions and bureaucratic delays (Makalima & Sokhetye, 2025).

Additionally, it was recognised that there is an increased need for planning with the community rather than simply planning for the community. Therefore, an emphasis is placed on involving the community in the decision-making process through public participation to find local solutions together (Cilliers & Victor, 2018). However, participatory planning approaches are not without their challenges, including technical and financial constraints, as seen in Durban's community-driven housing projects (Makalima & Sokhetye, 2025). Furthermore, incorporating green infrastructure into planning is challenging because local perspectives often conflict with globally recognised theories. To integrate green infrastructure with conventional planning methods, long-term strategies are required (Cilliers, 2019).

7.4 Conclusion

Three decades have passed since democracy was established in South Africa, an event that significantly reshaped the country's political, social, and economic landscape. Despite these profound changes, there is little evidence of change in the physical landscapes of urban and suburban areas (Maharaj, 2020). The urban environment is the product of many generations of human settlement and architectural progress, representing substantial investments in fixed capital (Oakenfull, 2021).

Therefore, modifying buildings and urban infrastructure to align with evolving development paradigms is neither quick nor straightforward, owing to the inherently gradual nature of change in the built environment (Berrisford, 2011). The call for comprehensive reform in urban planning continues; however, there is a marked lack of proposals for implementing these changes (Oakenfull, 2021). The practical measures and operational strategies required for urban planning reform have not been sufficiently addressed (Pieterse, 2006).

The anticipated outcome was that the newly introduced legislation would significantly change planning practices (Maharaj, 2020). It was widely acknowledged that this initiative would create an entirely new paradigm in urban planning, leading to beneficial development outcomes. The evidence indicates that planning practices have remained essentially unchanged, with activities still resembling their traditional forms (Moodley, 2019).

Although it became clear in the new democratic era that land-use planning extended beyond merely restrictive governance of spatial development, it was mistakenly believed that a new system would eliminate the social and racial injustices of the past (Oakenfull, 2021). Developing countries with diverse urban and rural areas, limited skills, experience, and financial resources should not imitate the complex planning systems of developed countries (Pieterse, 2006). While learning from Western Europe, North America, and Britain is valuable, planning must be adapted to local needs and focused on clear, vital objectives (Oakenfull, 2021).

CHAPTER 8 SYNTHESIS AND RECOMMENDATIONS

8.1 Introduction

The theoretical insights drawn from the literature reviews in Chapters 3 and 4, and the data collected from the empirical investigations in Chapters 5 (developed countries), 6 (developing countries), and 7 (South Africa), will be synthesised in this chapter. The synthesis will provide a comprehensive overview of the study, followed by evidence-based recommendations grounded in its findings. The structural framework of Chapter 8 is outlined in Figure 8.1.

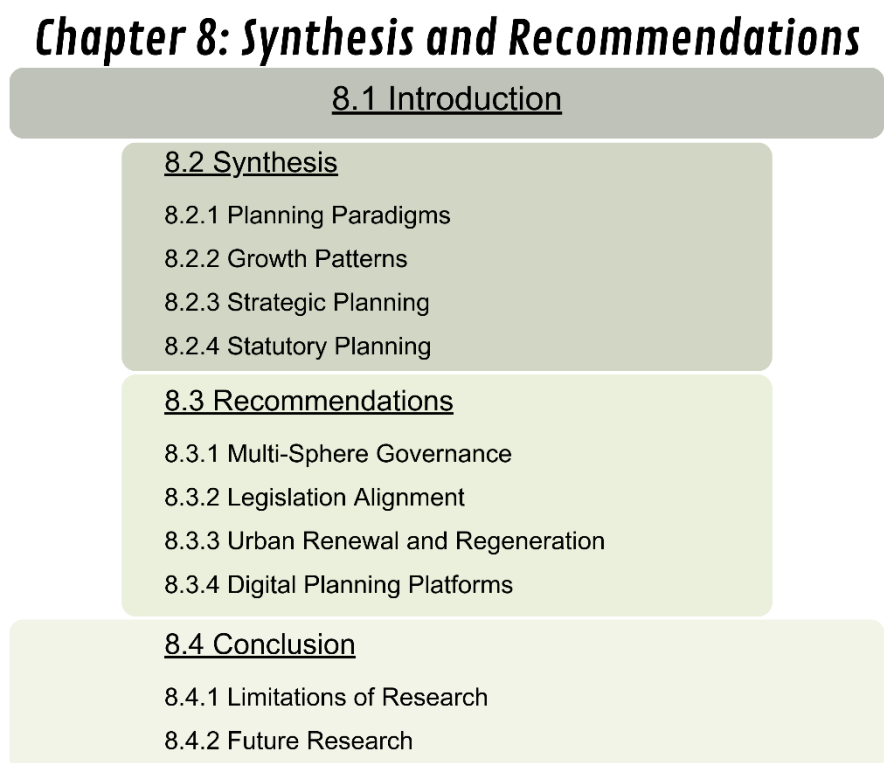


Figure 8.1: Structural Framework of Chapter 8

Source: Own construction

In line with the study's primary objectives, this chapter aims to: (i) provide evidence-based recommendations to improve the effectiveness of South Africa's spatial planning practices; and (ii) contribute to the literature to help build better knowledge of the dynamics of land use and spatial planning in South Africa (see Section 1.3, Objective iii and iv). This chapter focuses on identifying similarities and differences among the three developed countries (Australia, the Netherlands, and Canada), the three developing countries (Brazil, India, and Morocco), and South Africa. Furthermore, it seeks to identify key initiatives from both developed and developing

contexts that can be adapted and applied within the South African context. The locations of the seven countries used as case studies in this research are displayed in Figure 8.2.



Figure 8.2: The Seven Case Study Countries

Source: Own construction

8.2 Synthesis

This section presents a comprehensive synthesis of the study, systematically organising the underlying concepts into analytically derived themes. These themes were developed through a systematic process of comparative analysis and interpretive reasoning rather than inductively. Recurrent patterns, points of tension, and explanatory mechanisms that appear throughout the chapters were identified, covering core concepts, key challenges, and prominent theoretical claims. In addition, themes were generated by examining the points of convergence and divergence between planning theory and its practical implementation.

From these discrepancies, higher-order themes, such as the implementation gap, institutional capacity and governance, and the influence of political economy on spatial planning, inevitably emerged. Recurrent structural similarities and differences were also identified in the comparison between developed and developing countries. Consequently, the resulting themes serve as analytically derived frameworks that combine theoretical and empirical insights, clarifying both the systematic constraints and the enabling conditions. Figure 8.3 provides a framework for summarising the planning frameworks of the seven countries.

Planning Frameworks of the Case Study Countries

	Australia	Netherlands	Canada	Brazil	India	Morocco	South Africa
Government	Constitutional monarchy, federal parliament	Constitutional monarchy, parliament	Constitutional monarchy, federal parliament	Federal democratic republic	Democratic parliamentary	Constitutional monarchy	Constitutional democracy, unitary state, parliamentary
Divisions	6 States 2 Territories	12 Provinces	10 Provinces 3 Territories	26 States 1 Federal unit 5 Regions	28 States 8 Union territories	62 Provinces 13 Prefectures 12 Regions	9 Provinces
System	Decentralised planning system	Centralised (planning) Decentralised (government)	Decentralised planning system	Centralised planning system	Decentralised planning system	Centralised (planning) Decentralised (government)	Centralised (planning) Decentralised (government)
Municipalities	Lack constitutional recognition, Subordinate to state governments	Local planning autonomy and authority	Authority granted by provinces, Greater autonomy, Increased planning authority	Recognised as federal entities, Implementation authority	Increased planning authority	Primary implementation authority	Local planning autonomy and authority
Legislation	States and territories each have their own	Environment and Planning Act (2024) 4 Decrees	Provinces and territories each have their own	City Statute (2001) Metropolis Statute (2015)	Model Town and Country Planning Act (1957), States each have their own	Urban Planning Law (1992), Subdivision, Housing Groups and Land Divisions Law (1992)	SPLUMA (2013), Municipal Fiscal Powers and Functions Amendment Act(2024)
Strategic	National Urban Policy (2011)	National Environmental Vision (2020)	National Infrastructure Assessment (2021), Federal Sustainable Development Strategy (2022)	National Regional Development Policy (2003), National Urban Development Policy (20050)	National Land Use Policy (2013), National Urban Policy Framework (2018)	National Spatial Development Framework (2004), National Urban Policy Framework (2012)	National development plan (2012), National spatial development framework (2022)
Statutory	Local planning schemes, Metropolitan region schemes	Environmental plans, Environmental programmes	Official plans, Zoning bylaws	Municipal master plans, Metropolitan statutory plans, Zoning laws	Master plans, Regional plans, Zoning development plans	Master urban development plan, regional territorial development plan, zoning development plan	Spatial development frameworks, Land use management systems

Figure 8.3: Planning Frameworks of the Case Study Countries

Source: Own construction

8.2.1 Planning Paradigms

- **Rational Planning**

Rational planning emphasises the use of scientific methods and quantitative data to support evidence-based decision-making (see Section 3.2.1). However, it has limited capacity to address complex urban issues and often neglects cultural and social factors (see Section 3.2.1). Australia, the Netherlands, and Canada have highly organised, robust planning frameworks (see Section 5.5) that best exemplify the principles of rational planning among the seven case studies (See Figure 8.4).

Within Australia's decentralised planning system, the Commonwealth Government (see Section 5.2.3.i) influences planning decisions through national policies (see Section 5.2.4), while the State and Territory Governments hold primary authority over planning legislation (see Section 5.2.3.ii). The same decentralisation is evident in Canada (see Section 5.4.2), where provincial and territorial governments establish their own planning legislation (see Section 5.4.3), while the federal government influences planning decisions through national policies (see Section 5.4.3.i). However, Australian municipalities lack constitutional recognition (see Section 5.2.2) and are subordinate to state governments, with powers delegated for execution (see Section 5.2.3.iii). Meanwhile, Canadian municipalities enjoy greater autonomy and authority over planning decisions (see Section 5.4.3), granted by provincial legislation (see Section 5.4.3.iii).

In contrast, the Netherlands has a centralised planning system combined with a decentralised government structure that requires balancing local autonomy with central oversight (see Section 5.3.2). Therefore, development objectives are set through national policies and legislation (see Section 5.3.2.i), while municipalities develop local plans to implement planning visions (see Section 5.3.2.iii). Additionally, recent legislative reforms in the Netherlands have focused on simplifying decision-making (see Section 5.3.4.i). Furthermore, to ensure that planning objectives are met, the Netherlands employs pre-implementation controls and conducts post-implementation evaluations (see Section 5.3.5.iii). In contrast, official plans serve as a guiding framework for local decision-making in Canada (see Section 5.4.5.i).

Decision-making in Australia and the Netherlands focuses on environmental management (see Sections 5.2.3.ii and 5.3.4.i). In the Netherlands, the environmental permit serves as an integrated permit for both environmental management and spatial planning, thereby encouraging informed decision-making and more timely outcomes (see Section 5.3.5.ii). Similarly, Australia has established planning panels to expedite planning procedures (see Section 5.2.6). Additionally, the Netherlands evaluates the environmental impact of planning decisions through environmental

impact assessments before approving development applications, as required under the environmental plan (see Section 5.3.5).

- **Incrementalism**

In countries such as Brazil, India, Morocco, and South Africa, limited resources and political will require the gradual implementation of planning practices (see Sections 3.2.2, 6.2.6, 6.3.6, 6.4.6, and 7.3.6). An incremental approach allows cities to develop gradually while addressing socio-spatial challenges and meeting the immediate needs of local communities (see Section 3.2.2). These countries need a flexible planning approach, especially as they face challenges related to rapid urbanisation, urban sprawl, and informality (see Section 7.4 and Figure 8.4).

Brazil, India, and Morocco have master plans (see Sections 6.2.5.iii, 6.3.5.iv, and 6.4.5.ii), whereas South Africa has spatial development frameworks (see Section 7.3.5.i) that serve as blueprints for spatial planning decisions. Master plans should be updated regularly to ensure planning decisions are grounded in current and relevant spatial data (see Section 3.2.2). However, Brazil and India revise their master plans only once every decade, even though these plans remain relevant for 20 to 25 years (see Sections 6.2.5.iii and 6.3.5.ii). This revision cycle may be inadequate to address the challenges posed by rapid urbanisation and environmental change in these developing countries (see Sections 6.3.5.ii and 6.4.5.ii).

The city of Lahti, Finland, which revises its master plans every four years, exemplifies incremental master planning (see Section 3.2.2). Morocco's master plans are used to promote equitable development and address historical injustices caused by colonial rule (see Section 6.4.5.ii). Similarly, South Africa's spatial development frameworks are used to counter the legacy of spatial segregation under Apartheid legislation (see Section 7.3.4.vii). This approach aligns with incrementalism, as it uses historical data to guide urban transformation (see Section 3.2.2).

Incremental improvements have supported development in economically prosperous regions, thereby addressing regional inequalities in Brazil (see Section 6.2.5.i). The *City Statute* (2001) of Brazil aims to formalise all informal settlements through incremental upgrading (see Section 6.2.4.ii). The gradual implementation of supportive policies and infrastructure, along with large-scale projects in South Africa, helps ensure a fair distribution of development benefits, especially in the context of post-apartheid planning (see Section 7.3.2). Because the urban environment has evolved over many generations of human settlement, modifying buildings and infrastructure to meet evolving development paradigms is neither quick nor straightforward, given the gradual nature of change in the built environment (see Section 7.4).

- **Mixed Scanning**

Countries that found rational planning too idealistic (Brazil, India, Morocco, and South Africa) and viewed incrementalism as too restrictive (Australia, the Netherlands, and Canada) might find mixed scanning more suitable for their planning decisions (see Section 3.2.3). Mixed scanning combines higher-level rational decisions with lower-level incremental choices, thereby integrating long-term visions (rational planning) with short-term implementation strategies (incrementalism) (see Section 3.2.3 and Figure 8.4).

In Australia, Canada, and India, the state, provincial, and territorial governments are responsible for higher-level decision-making (see Sections 5.2.3.ii, 5.4.3.ii, and 6.3.3.ii), while municipal governments are responsible for lower-level decision-making (see Sections 5.2.3.iii, 5.4.3.iii, and 6.3.3.iii). However, the *Model Town and Country Planning Act* (1957) of India indicates that the national government facilitates higher-level decision-making (see Section 6.3.4.ii). In the Netherlands, Brazil, Morocco, and South Africa, the national governments are responsible for higher-level decision-making (see Sections 5.3.4.i, 6.2.3.i, 6.4.3.i, and 7.3.3.i), while the state, provincial, and municipal governments are responsible for lower-level decision-making (see Sections 5.3.2.iii, 6.2.3.iii, 6.4.3.iii, and 7.3.3.iii).

Australia (see Section 5.2.2) grants limited powers to its municipal governments, leaving higher-level decision-makers with greater authority (see Section 5.2.3.ii). By contrast, the Netherlands, Canada, Brazil, India, and Morocco (see Sections 5.3.5, 5.4.3, 6.2.3.iii, 6.4.3.iii, and 7.3.3.iii) empower their municipal governments with greater authority and autonomy, allowing them more flexibility in lower-level decisions. However, during apartheid in South Africa, municipalities played a subordinate role; therefore, the *Constitution of South Africa* (1996) granted municipalities additional responsibilities (see Section 7.3.3.iii), indicating a global shift towards more localised planning practices. Figure 8.4 visually presents the planning paradigms employed across the seven countries.

Planning Paradigms in the Seven Case Study Countries

Framework Dimension	Australia	Netherlands	Canada	Brazil	India	Morocco	South Africa
Dominant Planning Paradigm	Rational planning Mixed scanning	Rational planning Mixed scanning	Rational planning Mixed scanning	Incrementalism Mixed scanning	Incrementalism Mixed scanning	Incrementalism	Incrementalism Mixed scanning
Role of National Government	Policy guidance and strategic influence	Sets national development objectives and legislation	Strategic policy guidance	Strategic direction through the City Statute	Facilitates higher-level planning through national acts	Central strategic control	National policy, legislation, and transformation agenda
Role of Subnational Government	States and territories control planning legislation	Provinces coordinate implementation	Provinces and territories enact planning law	States and municipalities implement plans	States coordinate planning functions	Regions support implementation	Provinces support and coordinate planning
Role of Municipal Government	Limited, delegated execution powers	Strong implementation role through local plans	Strong local autonomy under provincial law	Primary implementation through master plans	Implementation through municipal plans	Local execution within national frameworks	Constitutionally empowered municipalities
Primary Planning Instruments	Statutory plans, planning panels, EIAs	Environmental plans, integrated permits	Official plans, provincial statutes	Master plans, incremental upgrading tools	Master plans (10-year revisions)	Master plans	Spatial Development Frameworks
Decision-Making Logic	Top-down, evidence-based	Central vision with decentralised execution	Rational guidance with local discretion	Gradual adaptation to informality	Stepwise response to rapid urbanisation	Gradual restructuring	Incremental correction of apartheid spatial legacy
Approach to Change	Procedural efficiency and certainty	Streamlined and evaluated implementation	Policy-led guidance	Incremental upgrading and redistribution	Gradual spatial adjustment	Incremental equity-driven change	Long-term transformation via incremental steps
Planning Paradigm Outcome	Strong certainty, limited local flexibility	Balanced efficiency and responsiveness	Rational yet locally adaptable	Flexible but slow transformation	Responsive but constrained by outdated plans	Equity-oriented but slow	Transformative but institutionally demanding

Rational planning logic

Incremental planning logic

Mixed scanning

Strong municipal authority

Limited municipal authority

Figure 8.4: Planning Paradigms in the Case Study Countries

Source: Own construction

8.2.2 Growth Patterns

- **Garden City Model**

The original principles of the garden city model may not fully address current urban challenges. However, the garden city model's historical impact remains evident in modern cities (see Section 3.3.1 and Figure 8.5).

Urban areas surrounded by greenbelts that provide environmental benefits are included in Howard's vision for garden cities (see Section 3.3.1). Cities such as Melbourne, Australia, and Ontario, Canada, include non-urban areas and greenbelts (see Sections 5.2.4.ii and 5.4.6), although urban sprawl endangers greenbelt development in Canada (see Section 5.4.6). Australia and South Africa aim to incorporate environmental considerations into all planning decisions (see Sections 5.2.3.ii, 5.2.4.ii, 5.2.5.i, and 7.3.4.iv). Meanwhile, the Netherlands and India integrate spatial planning with environmental management to protect natural resources (see Sections 5.3.4.i and 6.3.5.i). Additionally, Canada's legislation emphasises the need to balance urban development with environmental preservation (see Section 5.4.4.vii).

The garden city model was designed to mitigate the social impacts of development (see Section 3.3.1). Australia, the Netherlands, Brazil, and South Africa focus on developing urban areas that encourage social activity. Spatial planning tools in these countries to reduce social vulnerabilities and improve living conditions, thereby fostering a healthy environment, include: (i) the *National Climate Resilience and Adaptation Strategy* (2021) of Australia, (ii) the *Environmental Quality Decree* and the *National Environmental Vision* (2020) of the Netherlands, (iii) the *Constitution of Brazil* (1998), and (iv) the *Reconstruction and Development Programme* (1994) of South Africa (see Sections 5.2.5.iv, 5.3.4.ii, 5.3.5.ii, 6.2.4.i and 7.3.5.i).

Another goal of the garden city model is to bridge the gap between rural and urban communities, creating an ideal living environment that combines the benefits of both (see Section 3.3.1). Canada, India, and Morocco focus on meeting the needs of both communities and on infrastructure that enhances connectivity between rural and urban areas (see Sections 5.4.4 iv, 6.3.4.iii and 6.4.5.i). The Netherlands and South Africa find this balance more challenging because urban areas are rapidly transforming into metropolitan regions (see Sections 5.3.6 and 7.3.5.i). The decentralisation of metropolitan areas, a priority of the garden city model (see Section 3.3.1), is evident in the spatial planning of India and Morocco. The *National Urban Policy Framework* (2018) of India and the *Advanced Regionalisation Project* (2010) of Morocco aim to reduce urban concentration in metropolitan areas (see Sections 6.4.4 and 6.3.5.v).

Finally, Howard envisioned cities connected by direct transport routes to facilitate efficient movement (see Section 3.3.1). Australia's *National Urban Policy Framework* (2011) and the Netherlands' *National Mobility Strategy* (2022) promote the development of polycentric cities connected by electric rail networks, with intra-city transport relying on bicycles and electric vehicles (see Sections 5.2.5.ii and 5.3.5.iii). Meanwhile, Brazil's *National Urban Development Policy* (2005) and *National Urban Mobility Policy* (2012) focus on upgrading urban transport systems to enhance public and non-motorised transport (see Sections 6.2.5.ii and 6.2.5.v). The need to adhere to multiple jurisdictions in Canada and outdated land-use policies in India have hindered the integration of transport planning into spatial planning in both countries (see Sections 5.4.6 and 6.3.6).

- **Sector Model**

Hoyt's sector model emphasises the development of the city centre and its outward expansion, leading to urban sprawl (see Section 3.3.2). Urban sprawl characterises the growth of Canada, Brazil, and India. In Canada, urban sprawl is addressed by integrating smart-growth principles into official plans (see Section 5.4.5.i), whereas in Brazil it is addressed through the *National Urban Development Policy* (2005) (see Section 6.2.5.ii). In India, urban sprawl depletes open spaces and agricultural land and drives rising land and housing prices, particularly in Bangalore (see Sections 6.3.5.i and 6.3.4.ii and Figure 8.5).

The sector model enabled high- and middle-income residents to move to rural areas on the outskirts of cities (see Sections 3.3.2). Furthermore, the development of middle- and low-income housing became economically unviable, resulting in a shortage of affordable housing for low-income communities, as shown across all seven countries (see Sections 5.2.5.v, 5.3.5.iv, 5.4.5.ii, 6.2.5.iv, 6.3.4.i, and 7.3.6). The housing crisis is being addressed through: (i) Australia's *National Housing and Homelessness Plan* (2023), (ii) Canada's *National Housing Strategy* (2017), (iii) Brazil's *My House, My Life Programme* (2009) and (iv) South Africa's *Reconstruction and Development Programme* (1994) (see Sections 5.2.5.v, 5.4.5.ii, 6.2.5.iv and 7.3.5.i).

Additionally, Morocco is developing new towns and eco-cities, such as Benslimane, to improve access to housing (see Sections 6.4.5.i and 6.4.5.ii). The Netherlands and South Africa aim to provide mixed-income housing that accommodates diverse income groups to reduce segregation (see Sections 5.3.5.iv and 7.3.5.ix). During apartheid in South Africa, urban areas were divided into racial zones, separated by open spaces serving as buffer zones (see Section 7.2.4). These buffer zones and corridors were sparsely developed, and affluent neighbourhoods remain segregated from impoverished townships (see Section 7.3.6). Additionally, activity corridors and

nodes are located near primary growth centres to reduce spatial disparities and maximise development outcomes (see Section 7.3.5.vii).

- **Central Place Theory**

According to Christaller (1966), the economic impact of a central place depends on the distance people are willing to travel to obtain a service and on the population size required to support it (see Section 3.3.3). Mixed-use and high-density developments can reduce travel distances and increase urban population size (see Figure 8.5).

Australia and South Africa aim to develop higher-density urban areas. Australia's *National Urban Policy Framework* (2011) and South Africa's *Urban Development Framework* (1997) promote compact cities, mixed-use areas and high-density development (see Sections 5.2.5.ii, 5.2.5.iv and 7.3.5.ii). Consequently, Australia seeks to create 30-minute cities to reduce travel times (see Sections 5.2.5.ii). The original central place theory emphasises centralising services in one location to enhance service area development. People within the designated service zone are expected to travel to the centre for services (see Section 3.3.3). However, the *National Mobility Strategy* (2022) of the Netherlands and the *National Urban Mobility Policy* (2012) of Brazil emphasise accessibility over mobility and aim to create urban spaces that are accessible to people (see Sections 5.3.5.iii and 6.2.5.v).

The development of a central place often leads to the formation of metropolitan regions, as the concentration of services promotes urban growth (see Section 3.3.3). Metropolitan regions such as Adelaide, Melbourne, and Sydney in Australia are experiencing rapid population growth (see Section 5.2.5.ii). Conversely, urban areas in the Netherlands are quickly transforming into metropolitan regions (see Section 5.3.6). India's *National Urban Policy Framework* (2018) aims to reduce urban concentration in metropolitan cities and encourage the growth of smaller cities (see Section 6.3.5.v). Additionally, South Africa's *Spatial Development Initiatives* (1999) aim to increase investment in underdeveloped regions (see Section 7.3.5.iv).

The concentration of services in central locations can lead to uneven development and regional disparities, as observed in Brazil, India, Morocco, and South Africa. In India, the states of Karnataka and Maharashtra, along with the city of Punjab, exemplify uneven regional development (see Sections 6.3.4.ii, 6.3.4.iii, and 6.3.5.i). Brazil and Morocco address regional disparities by enhancing regional competitiveness and promoting decentralisation (see Sections 6.2.5.i, 6.4.5.i, and 6.4.5.ii). In South Africa, the creation of activity corridors and nodes is expected to support economic integration by strengthening urban centres and regional hubs (see Section 7.3.5.viii). The *National Spatial Development Framework* (2004) of Morocco and the

National Development Plan (2012) and *National Spatial Development Framework* (2022) of South Africa aim to reorganise and optimise the spatial distribution of economic activities to maximise the economic potential of cities (see Sections 6.4.5.i and 7.3.3.i).

- **Core-Periphery Model**

To clarify the relationship between economic growth and spatial dispersion, Friedmann developed the core-periphery model in 1966, linking the sector model (Hoyt, 1939) and central place theory (Christaller, 1966) (see Section 3.3.4). Sparsely populated, remote rural settlements are characteristic of the pre-industrial phase of development (see Section 3.3.4). Brazil, India, Morocco, and South Africa face challenges in addressing the development of informal settlements, particularly in rural and peri-urban areas (see Sections 6.4.4.ii, 6.3.4.i, and 6.4.6). Brazil and South Africa seek to upgrade informal settlements (see Sections 6.2.4.ii and 7.3.5.viii), whereas growth in India and Morocco has led to land degradation, endangering agriculture and rural livelihoods (see Sections 6.3.5.i and 6.4.6). In Morocco, urban areas develop along the coast, and rural areas expand further inland (see Section 6.4.5.iii and Figure 8.5).

During the transitional development stage, a central metropolis emerges as a growth centre, attracting skilled labour (see Section 3.3.4). Therefore, Brazil enacted the *Metropolis Statute* (2015) to regulate the development of metropolitan regions (see Section 6.2.4.iii). South Africa aims to provide housing near growth centres to support employment (see Section 7.3.5.viii). In South Africa and Morocco, urban and rural regions remain segregated, leaving rural populations vulnerable to poverty (see Sections 6.4.1, 6.4.5.iii, 7.3.5.i, and 7.3.6). Regional development in the Indian states of Karnataka and Maharashtra is uneven, with metropolitan cities highly concentrated and smaller cities largely unaffected by development (see Sections 6.3.4.ii, 6.3.4.iii, and 6.3.5.v).

The industrial phase of development is characterised by rapid economic growth (see Section 3.3.4). Brazil promotes economic growth through infrastructure investments (see Section 6.2.5.iii), whereas Morocco maximises the economic potential of urbanisation to foster economic growth (see Section 6.4.5.i). To reduce rural poverty and foster equitable growth, Brazil, Morocco, and South Africa address regional disparities within their planning frameworks. These countries seek to strengthen the rural economy, reduce rural poverty, and support equitable growth across urban and rural regions through their policy frameworks: (i) the *National Regional Development Policy* (2003) of Brazil, (ii) the *National Urban Policy Framework* (2012) of Morocco, and (iii) the *Rural Development Framework* (1997) and the *Green Paper* (1999) of South Africa (see Sections 6.2.5.i, 6.4.5.ii, 7.3.5.iii, 7.3.5.v and 7.3.5.vii). Figure 8.5 presents the growth patterns across the seven countries.

Growth Patterns in the Seven Case Study Countries

Framework Dimension	Australia	Netherlands	Canada	Brazil	India	Morocco	South Africa
Dominant Growth Models	Garden City; Central Place	Garden City; Central Place	Garden City; Sector Model	Sector Model; Core-Periphery	Sector Model; Core-Periphery	Garden City; Core-Periphery	Garden City; Core-Periphery
Environmental Integration	Environmental considerations embedded in all planning decisions	Spatial planning integrated with environmental management	Development balanced with environmental protection	Environmental protection secondary to growth	Environmental management challenged by rapid urbanisation	Environmental protection linked to spatial restructuring	Environmental sustainability embedded in post-apartheid planning
Urban–Rural Relationship	Urban containment with peri-urban expansion	Increasing metropolitanisation on challenges balance	Focus on urban–rural connectivity	Strong rural–urban divide	Strong rural–urban divide	Policies aim to decentralise metropolitan growth	Persistent rural–urban segregation
Metropolitan Growth Pattern	Polycentric metropolitan regions	Rapid transformation into metropolitan regions	Urban sprawl around metropolitan centres	Concentration in metropolitan cores	High concentration in major metropolitan cities	Coastal metropolitan concentration	Metropolitan dominance with peripheral marginalisation
Transport & Connectivity Logic	Polycentric cities; 30-minute city; electric rail	Rail-based polycentric systems; active mobility	Fragmented integration due to multiple jurisdictions	Public and non-motorised transport upgrades	Weak integration of transport and land use	Decentralisation supported by regional connectivity	Activity corridors and development nodes
Housing & Social Outcomes	Housing affordability addressed nationally	Mixed-income housing to reduce segregation	Affordable housing strategies	Incremental housing provision	Housing shortages and rising costs	New towns and eco-cities	Spatial segregation legacy persists
Regional Inequality Response	Balanced growth via compact cities	Controlled growth through national coordination	Smart-growth principles	Incremental upgrading and regional investment	Policy aims to reduce metro dominance	Regionalisation and decentralisation	Corridors and nodes to promote integration
Growth Pattern Outcome	Managed polycentric growth	Controlled metropolitan expansion	Sprawl-prone but regulated	Uneven core-periphery development	Highly uneven regional development	Coastal core with inland periphery	Strong core-periphery structure

Planned / controlled growth logic
 Incremental / uneven growth logic
 Hybrid / converging growth pattern
 Polycentric / decentralised spatial structure
 Strong core–periphery or sprawl dominance

Figure 8.5: Growth Patterns in the Case Study Countries

Source: Own construction

8.2.3 Strategic Planning

Strategic planning guides actions and decisions through a long-term, visionary, and goal-oriented approach (see Section 4.2). It also promotes collaboration and public participation (see Sections 4.2.1 and 4.2.2). Furthermore, strategic planning is a proactive, flexible, and adaptable approach to spatial planning (see Section 4.2.4 and Figure 8.6).

- **Advocacy and Equity Planning**

Advocacy planning requires planners to represent marginalised communities in decision-making, whereas equity planning focuses on ensuring that marginalised communities have access to opportunities and resources (see Section 3.2.4 and Figure 8.6).

The *Planning Act* (1999) of the Northern Territory of Australia recognises the land rights of Indigenous communities; however, limited Indigenous involvement in decision-making has led to marginalisation and inequality (see Section 5.2.4.iv). Meanwhile, Canada aims to involve First Nations, and policy development is often guided by traditional knowledge (see Sections 5.4.4.v, 5.4.4.vi, 5.4.4.vii, 5.4.5.i, and 5.4.5.vi). Furthermore, India's *Smart Cities Mission* (2015) facilitates public participation in planning decisions through technology (see Section 6.3.5.iv). In Morocco and South Africa, public participation in planning remains difficult because of the legacy of colonial and apartheid laws that left marginalised communities excluded from decision-making (see Sections 6.4.4.i and 7.3.2). Therefore, the *Constitution of South Africa* (1996) and *SPLUMA* (2013) promote and require public participation in planning processes to ensure that communities are not excluded from decision-making (see Sections 7.3.2 and 7.3.4.vii). Furthermore, women are considerably underrepresented in Morocco's economic participation (see Section 6.4.5.iii).

The *Reconstruction and Development Programme* (1994) of South Africa aims to provide disadvantaged individuals with access to basic services to improve their living standards, emphasising a non-racial, non-sexist society (see Section 7.3.5.i). In Canada, the provinces of Quebec, British Columbia, and New Brunswick have granted municipalities autonomy to incorporate democratic governance into planning practices (see Sections 5.4.4.ii, 5.4.4.viii, and 5.4.4.ix). Canada recognises that a lack of internet infrastructure marginalises rural areas; therefore, community-based networks have been introduced to promote digital progress among marginalised communities (see Section 5.4.5.iii). Given India's linguistically, religiously, and culturally diverse population (see Section 6.3.2), the *74th Amendment Act* (1992) empowers municipalities to promote social justice (see Section 6.3.4.i).

In Brazil, India, Morocco, and South Africa, rapid urbanisation, population growth, and social and economic inequalities have contributed to the proliferation of informal settlements (see Sections

6.2.6, 6.3.4.i, and 6.4.4.ii). Therefore, South Africa's *National Development Plan* (2012) aims to address the triple challenges of poverty, unemployment, and inequality by improving all informal settlements (see Section 7.3.5.viii). In India, informal settlements have contributed to a housing crisis, particularly in Delhi (see Section 6.3.5.i). Brazil aims to promote spatial equity and improve the living conditions of economically disadvantaged communities (see Section 6.2.5.ii) by enhancing accessibility and providing affordable housing (see Sections 6.2.5.iv and 6.2.5.v). Special social-interest zones designated for social housing are incorporated into zoning plans in Brazil to foster inclusive development (see Section 6.2.5.iv). Meanwhile, Morocco's master plans aim to promote equitable development and address historical injustices, with particular emphasis on improving infrastructure for underserved communities (see Section 6.4.5.ii).

- **Communicative and Collaborative Planning**

Communicative planning involves planners engaging with the public to keep them informed. For example, Amsterdam, the Netherlands, is recognised as a pioneer in communicative planning (see Section 3.2.5). Collaborative planning requires that planners keep all stakeholders equally informed throughout the decision-making process to promote consensus-building (see Section 3.2.5). Queensland, Australia, emphasises collaboration between state and local governments (see Section 5.2.4.vii), whereas Canada focuses on cooperation between the federal and provincial governments (see Sections 5.4.5.i and 5.4.5.v). Furthermore, Australia and the Netherlands lack coordination among different levels of government, which may jeopardise accountability and transparency in planning decisions (see Sections 5.2.6 and 5.3.6 and Figure 8.6).

The Australian Capital Territory improved resource utilisation through inter-regional collaboration (see Section 5.2.4.vi). To enhance collaboration across all levels of government, British Columbia, Canada, granted municipalities increased autonomy (see Section 5.4.4.ix). Additionally, Brazil's *National Urban Development Policy* (2005) promotes collaboration in planning across all levels of government (see Section 6.2.5.ii). In South Africa, legislative reform was necessary to standardise planning practices nationwide and ensure coordination among government levels (see Section 7.3.2); therefore, the country has a structured system of collaboration established by the *Systems Act* (2000) (see Section 7.3.4.v). Additionally, the establishment of intergovernmental organisations in South Africa is supported by the *Intergovernmental Relations Framework Act* (2005) (see Section 7.3.4.v), while *SPLUMA* (2013) underscores the importance of intergovernmental collaboration (see Section 7.3.6).

Stakeholders from diverse sectors participate in planning; therefore, communication and collaboration among them are essential for effective decision-making (see Section 3.2.5).

Collaboration and coherence between sectors are promoted by: (i) the *National Environmental Vision* (2020) of the Netherlands (see Section 5.3.5.ii), (ii) the *Metropolis Statute* (2015) of Brazil (see Sections 6.2.4.iii), and (iii) the *Green Paper* (1999) and the *White Paper* (2001) of South Africa (see Sections 7.3.5.v and 7.3.5.vi). Furthermore, the relationship between the government and the public is vital for making informed and effective planning decisions (see Section 3.2.5). Canada and South Africa are increasingly emphasising collaborative planning with communities. Saskatchewan, Canada, promotes collaboration with First Nations in planning legislation (see Section 5.4.4.vi), while the *Urban Development Framework* (1997) of South Africa aims to strengthen collaboration between municipalities and the public (see Section 7.3.5.ii).

- **New Urbanism and Sustainable Development**

Planning practices across all seven countries have shifted towards integrating economic, social, and environmental principles into spatial planning since the *Brundtland Report* (1987) declared sustainable development a global priority (see Section 3.3.5). Multiple planning policies in Australia, Canada's *Sustainable Development Strategy* (2022), India's *National Land Use Policy* (2013), and South Africa's *National Development Perspective* (2006) address sustainable development by tackling environmental challenges and promoting inclusive urban centres (see Sections 5.2.5.i, 5.2.5.ii, 5.2.5.iii, 5.4.5.v, 6.3.5.i, and 7.3.5 and Figure 8.6).

Climate action is one of the Sustainable Development Goals (see Section 3.3.5), and Australia, Canada, and India focus on creating climate-resilient cities through their policy frameworks (see Sections 5.2.5.ii, 5.2.5.iv, 5.4.5.i, and 6.3.5.v). Canada's *Climate Adaptation Platform* (2023) facilitates the exchange of information on climate change adaptation strategies (see Sections 5.4.5.vi and 5.4.5.i). India prioritises sustainable and resilient infrastructure (see Section 6.3.5.iii), while South Africa prioritises overall sustainability and resilience (see Section 7.3.4.vii). British Columbia in Canada aims to reduce greenhouse gas emissions, while Alberta in Canada specifically seeks to cut carbon emissions (see Sections 5.4.4.viii and 5.4.4.iii). Additionally, Canada endeavours to lower overall carbon emissions by implementing carbon-pricing measures such as a carbon tax (see Section 5.4.5.i). The Netherlands' *National Climate Agreement* (2019) focuses on reducing carbon emissions by increasing the share of renewable energy (see Section 5.3.5.i).

Another Sustainable Development Goal concerns the use of clean energy (see Section 3.3.5). Canada's *Emissions Reduction Plan* (2022) and Morocco's *National Climate Plan* (2015) emphasise the adoption of renewable energy, aiming to achieve 100% renewable energy (see Sections 5.4.5.iv and 6.4.5.iv). Furthermore, the focus on renewable energy extends to transport systems in Australia, agriculture in the Netherlands, and spatial planning in Morocco (see

Sections 5.2.5.ii, 5.3.5.i and 6.4.5.iii). Consequently, the *Environment and Planning Act* (2024) of the Netherlands offers flexibility regarding sustainability and green energy in spatial planning (see Section 5.3.4.i). Water management is another Sustainable Development Goal prioritised in Canada, Morocco, and South Africa. Canada monitors water and air quality while protecting vulnerable freshwater sources from development (see Sections 5.4.4.iii, 5.4.4.v, and 5.4.5.iii). The *Blue Economy Programme* aims to support the sustainable development of Morocco's coastal regions by encouraging the use of non-conventional water sources, given the country's water crisis (see Sections 6.4.5.iv and 6.4.5.v). Similarly, South Africa's *Integrated Urban Development Framework* (2016) aims to promote water-sensitive design to improve water management and reduce the impacts of climate change (see Section 7.3.5.ix).

The Sustainable Development Goals on responsible consumption and innovation are reflected in some countries. Australia and the Netherlands regenerate greyfield and brownfield sites to optimise the use of environmental space (see Sections 5.2.5.ii and 5.3.5.iii). Additionally, the Netherlands adopts circular economy principles to minimise waste (see Section 5.3.5.i). Meanwhile, Australia and India develop smart cities to manage resources effectively (see Sections 5.2.5.iii, 6.3.6, and 6.3.5.iv). Furthermore, the *Subdivision, Housing Groups, and Land Divisions Law* (1992) of Morocco and the *White Paper* (2001) of South Africa aim to optimise resource use (see Sections 6.4.4.ii and 7.3.5.vi). Urban areas characterised by mixed use are a feature of new urbanism, incorporated into Canada and South Africa. The *Urban Development Framework* (1997) and the *Integrated Urban Development Framework* (2016) of South Africa encourage mixed-use development (see Sections 7.3.5.ii and 7.3.5.ix), and Quebec, Canada, recognised that mixed-use development maximises resource efficiency (see Section 5.4.4.ii).

The Sustainable Development Goals of good health and reduced inequality are also evident in these countries. Canada used zoning bylaws to restrict drive-through restaurants and protect public health (see Sections 5.4.5.ii and 6.3.3.i). In the Netherlands, a healthy living environment and quality of life are priorities, as outlined in the *National Environmental Vision* (2020) and the *Environmental Quality Decree* (see Sections 5.3.5.ii and 5.3.4.ii). In addition, India has a ranking system under the *Institution for Transforming India* (2015) to assess the progress of different states towards the Sustainable Development Goals (see Section 6.3.5.ii). New towns, eco-cities, and eco-neighbourhoods such as Benslimane in Morocco are expected to help achieve sustainability by 2040, while the *National Development Plan* (2012) of South Africa aims to achieve sustainability by 2030, aligning with the timeline set out by the *United Nations* in 2015 (see Sections 6.4.5.i, 6.4.5.iii, and 7.3.5.viii). Figure 8.6 presents strategic planning employed across the seven countries.

Strategic Planning in the Seven Case Study Countries

Framework Dimension	Australia	Netherlands	Canada	Brazil	India	Morocco	South Africa
Strategic Planning Orientation	Long-term, goal-oriented strategic planning	Integrated and visionary strategic planning	Long-term, policy-driven planning	Development-led long-term planning	Incremental and adaptive planning	Gradual long-term restructuring	Transformative long-term planning
Advocacy and Equity Planning	Indigenous rights recognised, limited influence	Strong social inclusion focus	Strong First Nations inclusion	Equity through redistribution	Social justice through decentralisation	Equity constrained by historic inequality	Equity-driven redress
Public Participation	Formal but limited participation	Strong communicative planning	Strong participatory governance	Uneven participation	Technology-enabled participation	Limited public inclusion	Constitutionally required participation
Intergovernmental Collaboration	State–local collaboration with coordination challenges	Strong multi-level coordination	Federal–provincial cooperation	Collaboration promoted nationally	Fragmented multi-level coordination	Centralised coordination	Formalised intergovernmental collaboration
Response to Informality and Inequality	Targeted service delivery	Preventative social planning	Policy-based mitigation	Incremental informal settlement upgrading	Informality-driven housing challenges	Infrastructure-led equity interventions	National informal settlement upgrading
Sustainability and Resilience Vision	Climate-resilient cities	Climate action and circular economy	Climate adaptation and carbon pricing	Infrastructure-led sustainability	Sustainable infrastructure focus	Renewable energy and water security	Integrated sustainability and resilience
New Urbanism and Urban Quality	Compact, mixed-use cities	Healthy living environments	Selective mixed-use development	Social housing emphasis	Smart city initiatives	New towns and eco-cities	Mixed-use and spatial integration
Long-Term Vision Outcome	Managed long-term strategy	Highly integrated long-term vision	Inclusive strategic outcomes	Gradual equity improvements	Uneven long-term outcomes	Slow sustainability progress	Ambitious but demanding transformation

Strong, institutionalised long-term vision

Incremental / capacity-constrained long-term approach

Hybrid or evolving long-term vision

Strong collaboration & public participation

Weak or historically constrained participation

Figure 8.6: Strategic Planning in the Case Study Countries

Source: Own construction

8.2.4 Statutory Planning

Statutory planning is a detailed, legally binding process that governs land use and development (see Section 4.3.2). It involves creating and applying legislation and plans that direct and regulate land use and development (see Section 4.3.1). Statutory planning ensures that new developments comply with legal standards and includes reviewing applications for development permits, zoning, and building approvals (see Section 4.3.2 and Figure 8.7).

- **Planning Legislation**

Australia, Canada, and India do not have a single comprehensive national planning act; each state, province, and territory develops its own planning legislation as part of these countries' decentralisation (see Sections 5.2.4, 5.4.3, 5.4.4, and 6.3.3). However, India has a *Model Town and Country Planning Act* (1957) that serves as a foundational framework for each state's town and country planning act (see Section 6.3.4.ii), whereas in Australia and Canada, planning decisions are influenced only by national policies and frameworks (see Sections 5.2.4 and 5.4.3.i and Figure 8.7).

However, India's approach ensures that the states of India have similar town and country planning acts, whereas the individual states, provinces, and territories of Australia and Canada have different planning acts, leading to inconsistent practices and disparities (see Sections 5.2.4, 5.4.4, and 5.2.6). Despite the foundational framework provided to India's states, Chandigarh, Rajasthan, and Haryana have not yet developed their town and country planning acts (see Section 6.3.4.v).

Each colony of South Africa had its own planning ordinance during apartheid, similar to the states, provinces, and territories of Australia, Canada, and India (see Sections 7.2.5.i–7.2.5.iii). When South Africa transitioned to democratic governance, these planning ordinances were amended to prevent the proliferation of provincial laws (see Section 7.3.2). Additionally, the Netherlands, Brazil, India, and South Africa all have comprehensive national planning acts (see Sections 5.3.3.i, 6.2.3.i, 6.4.4.i, and 7.3.4.vii).

The Netherlands has the *Environment and Planning Act* (2024) and four government decrees (see Sections 5.3.4.i–5.3.4.iv). Brazil has the *City Statute* (2001) for urban development and the *Metropolis Statute* (2015) for the development of metropolitan regions (see Sections 6.2.4.ii and 6.2.4.iii). Morocco has the *Urban Planning Law* (1992) and the *Subdivision, Housing Groups, and Land Divisions Law* (1992), which replaced colonial-era planning (see Sections 6.4.4.i and 6.4.4.ii). South Africa has *SPLUMA* (2013) and the *Municipal Fiscal Powers and Functions Amendment Act* (2024), which amends *SPLUMA* (2013) and related acts (see Sections 7.3.4 and 7.3.4.viii).

- **Development Control**

Australia, Canada, and Morocco have zoning plans that guide development and regulate land use (see Sections 5.2.5.iv, 5.4.4.iii, and 6.4.5.iv). The zoning plans of Brazil and India are integrated with the master plans to guide a structured approach to urban planning (see Sections 6.2.5.iv and 6.3.5.iv). Furthermore, the master plans of Brazil, India, and Morocco guide and direct development (see Sections 6.2.5.iii, 6.3.5.ii, and 6.4.5.ii). The Netherlands has environmental plans rather than traditional zoning plans (see Section 5.3.5). Additionally, the municipal by-laws of South Africa regulate activities such as subdivision, rezoning, and development applications (see Section 7.3.5.iii and Figure 8.7).

Australia's development control plans, Canada's official plans, India's local area plans, and South Africa's spatial development frameworks guide urban land use and development (see Sections 5.2.5.iii, 5.4.4.i, 6.3.5.iii, and 7.3.5). Furthermore, Australia's local planning schemes, Canada's zoning bylaws, the Netherlands' environmental plans, Morocco's detailed development plans, and South Africa's land use schemes regulate development activities (see Sections 5.2.5.i, 5.4.4.ii, 5.3.5, 6.4.5, and 7.3.5.iii). Canada's zoning bylaws enforce official plans (see Section 5.4.4.ii).

The Netherlands' environmental plans are developed at the municipal and provincial levels, just like South Africa's spatial development frameworks (see Sections 5.3.5 and 7.3.5). South Africa's land-use schemes are part of the land-use management system, which includes land-use management regulations (see Section 7.3.5.iii). Australia's metropolitan region schemes direct metropolitan development to ensure that urban growth aligns with regional objectives (see Section 5.2.5.ii). Furthermore, Morocco has regional territorial development plans that address regional disparities to promote equitable regional growth (see Section 6.4.5.i).

- **Integration and Consolidation**

The *Planning and Development Act* (2005) of Western Australia consolidates three prior planning acts, and the *Planning Act* (2016) of Queensland, Australia, consolidates two prior planning acts into a single framework (see Sections 5.2.4.v and 5.2.4.vii). Additionally, the *Environment and Planning Act* (2024) of the Netherlands consolidates 26 laws and 250 documents to streamline and modernise spatial planning (see Section 5.3.4.i and Figure 8.7).

The Netherlands, certain Australian states, and some Indian provinces integrate spatial and environmental planning. The Netherlands' *Environment and Planning Act* (2024) merges spatial planning and environmental management, consolidating these laws into a single framework (see Section 5.3.4.i). In Australia, the *Environmental Planning and Assessment Act* (1979) of New South Wales and the *Planning and Environment Act* (1987) of Victoria emphasise the

incorporation of environmental factors into planning decisions (see Sections 5.2.4.i and 5.2.4.ii). Meanwhile, the *Planning and Project Assessment Act* (2013) of Nunavut also integrates environmental and spatial planning (see Section 5.4.4.viii).

Furthermore, the *Planning and Development Act* (2005) of Western Australia combines land-use planning with infrastructure planning (see Section 5.2.4.v), while the *Planning, Development and Infrastructure Act* (2016) of South Australia integrates spatial planning with technological innovation (see Section 5.2.4.viii). Nonetheless, Brazil and South Africa have developed integrated plans that coordinate policies across sectors and municipalities to promote development (see Sections 6.2.5.ii and 7.3.5.ii). The *Municipal Fiscal Powers and Functions Amendment Act* (2024) of South Africa introduces innovative mechanisms for development assessments (see Section 7.3.4.viii). Additionally, the Netherlands has reduced the number of permits required for development approval to a single permit (see Section 5.3.4.i). The Netherlands' environmental permit system consolidates 25 permit systems (see Section 5.3.5.ii). The statutory planning frameworks implemented in the case study countries are presented in Figure 8.7.

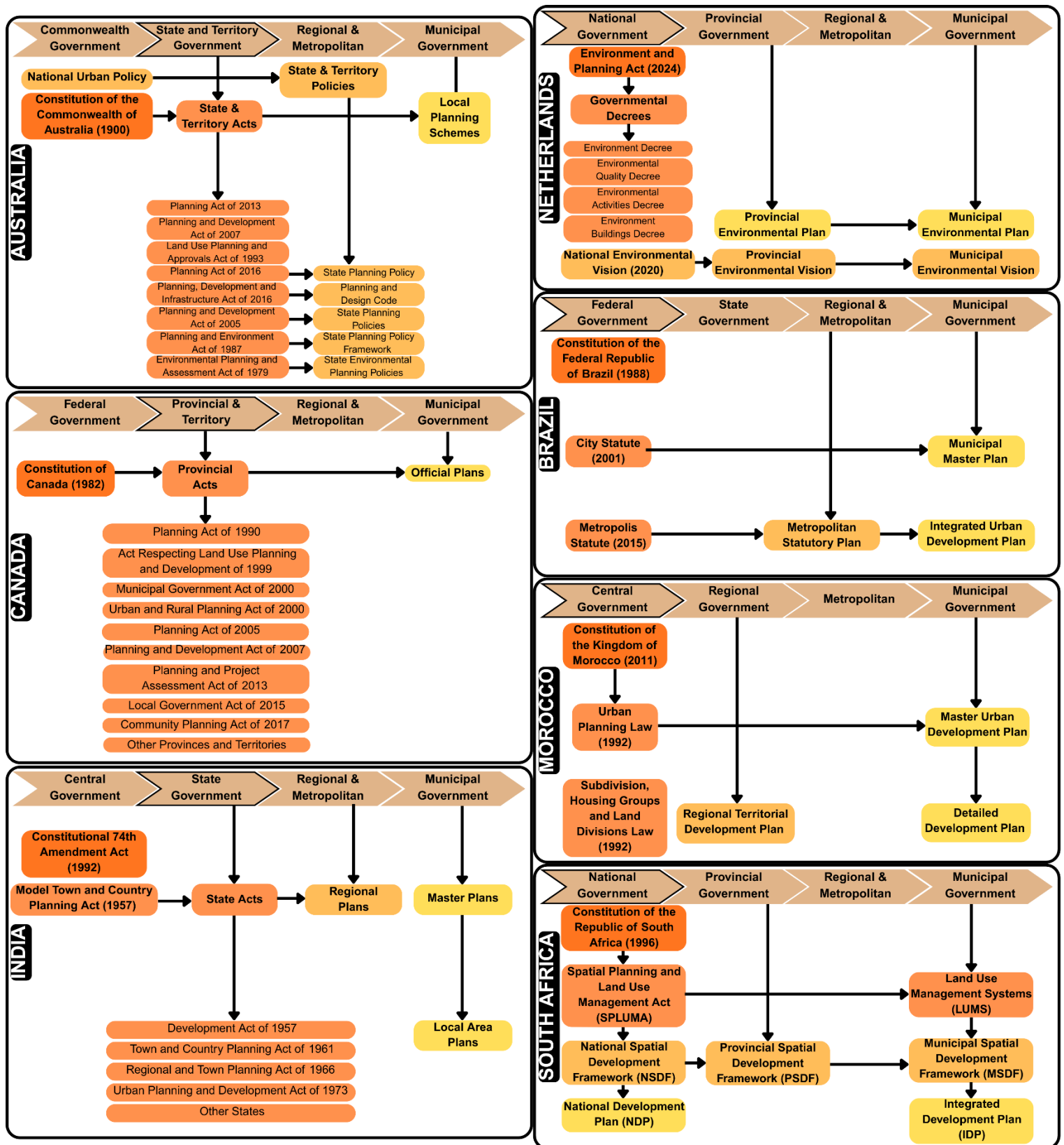


Figure 8.7: Statutory Planning in the Case Study Countries

Source: Own construction

8.3 Recommendations

In line with the study's primary objectives, this section presents evidence-based recommendations to enhance the effectiveness of South Africa's spatial planning practices for future planning reform, drawing on the literature review and empirical analysis of best practices from the six case study countries.

The main recommendations in this section include: (i) improving the effectiveness of different spheres of government (see Section 8.3.1); (ii) consolidating and integrating multiple planning legislation and approval procedures (see Section 8.3.2); (iii) upgrading urban areas through urban renewal and regeneration (see Section 8.3.3); and (iv) digitalising spatial planning by creating platforms (see Section 8.3.4).

8.3.1 Multi-Sphere Governance

Institutional inefficiencies within government structures can hinder the effective implementation of planning practices. Therefore, the local level of government is considered the most vital sphere within the overall decision-making framework. In addition, uneven regional development dynamics result in pronounced disparities in both economic growth trajectories and spatial development patterns. Thus, addressing these disparities has been the focus of multiple legislative reform efforts in South Africa.

- **Municipalities**

Before the adoption of the *Constitution of South Africa* (1996), municipalities were regarded as mere 'creatures of statute' and operated with severely limited autonomy and authority. These conditions contributed to markedly unequal development and service delivery outcomes (see Section 7.2.3.iii). As a result, Section 156(1) of the *Constitution of South Africa* (1996) grants municipalities the power to exercise governmental authority within specific spheres of functional administration (see Section 7.3.3.iii). The elevation of municipalities from their previous subordinate position, along with the assignment of expanded responsibilities and the authority to implement plans, was intended to form a core aspect of municipal decision-making (see Section 7.3.3.iii).

Consequently, a major challenge in the post-apartheid era was balancing a nationally coordinated planning framework with the constitutionally and administratively established authority of municipal governments (see Section 7.3.2). Furthermore, Schedule 1 of *SPLUMA* (2013) authorises provincial governments to enact and enforce legislation on matters that formally fall within municipalities' decision-making powers (see Section 7.3.3.ii). Nonetheless, when broader

national or provincial interests are involved, higher levels of government may justifiably override local preferences (see Section 7.3.3). Such multi-tiered oversight is regarded as both appropriate and essential in South Africa.

Furthermore, the *Municipal Demarcation Act* (1998) aligns with the constitutional mandate to modernise local governance structures (see Section 7.3.4.ii). More recently, the *Amendment Act* (2024) enhances local self-governance by granting municipalities broader authority to develop and implement financial policies and revenue-generating mechanisms (see Section 7.3.4.viii). As a result, South African municipal governments possess extensive and well-established constitutional authority; however, their institutional capacities and performance outcomes vary significantly across municipalities. Accordingly, the focus should not be on expanding municipal planning authorities but on systematically strengthening institutional support mechanisms that enable municipalities to exercise their existing constitutionally conferred powers effectively and sustainably.

South Africa could gain valuable insights from the Netherlands on how to balance comprehensive national oversight and regulatory control with effective local self-governance (see Sections 5.3.2, 5.3.5, and 5.3.6). A model of conditional autonomy characterises South Africa, whereas the Netherlands adopts a model of structured decentralisation (see Section 5.3.2). Therefore, South Africa's autonomy is constrained by institutional uncertainty and multi-layered control mechanisms. In contrast, in the Netherlands, autonomy operates within a framework of clearly defined rules and formalised intergovernmental collaboration (see Section 7.3.3.ii).

It is ***recommended that South Africa improve the institutional support systems of its municipalities*** by systematically adopting and adapting relevant governance models and best practices derived from the Netherlands:

- (i) The national government should set overarching policy objectives; the provincial governments should operationalise these by translating them into regionally suitable implementation frameworks; and the municipal governments should be responsible for their execution through local plans tailored to specific contexts (see Sections 5.3.3.i–5.3.3.iii).
- (ii) Although South Africa presently functions within a hierarchical governance framework, it does not demonstrate the same level of effectiveness as the hierarchical system employed in the Netherlands. This relative inefficiency is likely to permit ongoing interference from other tiers of government in the decision-making process (see Section 7.3.3)
- (iii) Instead of giving provinces authority to approve municipal decisions, legislation should require that local planning instruments adhere to national and provincial policy and

regulatory frameworks (see Section 7.3.3.ii). Adjacent municipalities and provinces should regularly hold formal negotiations on spatial planning priorities to foster coordinated regional development.

- **Regional Disparities**

South Africa is marked by significant spatial and socio-economic disparities across its provinces, between urban and rural areas, and between metropolitan regions and their peripheral areas. The *NDP* (2012) and the *NSDF* (2022) provide the main policy framework for spatial planning, explicitly aiming to restructure and optimise the spatial arrangement of economic activities (see Section 7.3.3.i). Nevertheless, the spatial divide between urban and rural areas, along with ongoing patterns of social inequality, remains deeply rooted and resistant to change (see Section 7.3.5.i). Consequently, the *Rural Development Framework* (1997) aims to strengthen the rural economy (see Section 7.3.5.iii), whereas the *Green Paper* (1999) establishes an integrated planning framework to promote both urban and rural development (see Section 7.3.5.v). Furthermore, the *Spatial Development Initiatives* (1999) serve as an integrated spatial planning tool intended to encourage and optimise investment in regions characterised by structural underdevelopment but showing substantial potential for economic growth and infrastructure development (see Section 7.3.5.iv).

Empirical evidence indicates that Brazil and Morocco also face significant interregional disparities in economic growth and spatial development (see Sections 6.2.5 and 6.4.4). South Africa can thus draw on initiatives implemented in Brazil and Morocco to develop strategies to reduce regional socio-economic disparities within its own national context. Brazil uses institutionalised mechanisms to systematically mobilise and allocate resources to peripheral regions (see Section 6.2.5.i). The *Advanced Regionalisation Project* (2010) in Morocco is designed as an institutional framework to promote administrative decentralisation and enhance regional development by aligning subnational planning processes with broader national policy objectives (see Section 6.4.4). Regional competitiveness and administrative decentralisation are identified as key factors in reducing interregional disparities in Morocco (see Section 6.4.5). Additionally, under the *Constitution of Morocco* (2011), regional councils are authorised to oversee and coordinate regional planning and development (see Section 6.4.5.i).

Based on the institutional and policy frameworks established in Brazil and Morocco, it is **recommended that South Africa establish city-regional authorities for metropolitan areas** to facilitate coordinated planning and governance of infrastructure investment, transport corridors and inter-jurisdictional land use:

- (i) The provincial and local spheres of government in South Africa show significant potential to shift from a mainly coordinative or alignment-focused role to one characterised by meaningful co-decision making, especially within planning processes that directly address regional development priorities.
- (ii) South African provinces should act as spatial integration centres to promote consistent alignment of integrated development plans, spatial development frameworks, and sectoral planning instruments, thereby ensuring their mutual spatial coherence and coordination.
- (iii) Furthermore, South Africa should create formal regional planning forums to institutionalise coordination and information sharing among the various levels of government, thereby improving multilevel governance and integrated spatial planning.
- (iv) South Africa should empower municipalities to impose betterment charges and infrastructure contribution fees, focusing especially on their application in peripheral urban and peri-urban areas, to improve the capture of land value increases and bolster the funding of local infrastructure provision.

This approach will reduce fragmented intermunicipal competition and direct investment towards the main economic areas, while also enhancing their functional integration with economically weaker peripheral regions.

8.3.2 Legislation Alignment

South Africa maintains a complex framework of statutory instruments and regulatory approval processes that govern spatial, environmental, and development planning. Consolidating and integrating multiple planning legislation and approval procedures can simplify and modernise South Africa's spatial planning system. This will facilitate sectoral alignment and streamline procedural complexity during the implementation of development activities.

- **Consolidation and Integration**

Following the end of apartheid in South Africa, comprehensive legislative reforms were necessary to establish a unified national planning framework and prevent the persistence of conflicting provincial planning systems (see Section 7.3.2). However, the proliferation of new planning legislation has resulted in a system that is notably fragmented and characterised by significant internal inconsistencies (see Section 7.3.2). Therefore, the demand for comprehensive planning reform to reduce fragmentation and inconsistency persists; however, there remains a notable lack of specific proposals for implementing these changes (see Section 7.4).

Empirical evidence suggests that various countries have recently undertaken reforms to their planning legislation to simplify and modernise spatial planning processes. Two Australian states

consolidated multiple outdated planning statutes into a single comprehensive planning framework (see Sections 5.2.4.v and 5.2.4.vii). The Netherlands unified 26 distinct statutes and 250 related policy and regulatory documents into a single, coherent framework (see Section 5.3.4.i). India integrated earlier missions and programmes to establish a consistent policy framework (see Section 6.3.5.v). Integrating spatial planning legislation with related sectors has also prompted legislative reforms in some countries, as demonstrated by the research. Integrating spatial planning with environmental management is outlined in the planning legislation of two Australian states and one Canadian province (see Sections 5.2.4.i and 5.2.4.ii). Furthermore, the recent reform of planning legislation in the Netherlands consolidates spatial planning and environmental management regulations into a single legislative framework (see Sections 5.3.4 and 5.3.6).

As a result, the Netherlands' *Environment and Planning Act* (2024) establishes an integrated regulatory framework for spatial planning, environmental management, and related sectors. This legislative reform underscores the importance of integrating spatial planning and environmental management to reduce conflicts, particularly at the local level (see Section 5.3.4). The law embodies a modern governance approach that treats the 'physical living environment' as a connected and interdependent system. This approach encourages sustainable development, safer and healthier environments, and more effective decision-making. The *Environment and Planning Act* (2024) is highly significant because it unifies a fragmented and complex legal framework into a transparent, accessible, and adaptable system.

South Africa's planning system could be significantly improved by systematically adopting and adapting the planning reforms currently implemented in the Netherlands. Consolidating multiple outdated statutes and integrating spatial planning with associated sector legislation can reduce fragmentation and inconsistencies within South Africa.

Therefore, it is ***recommended that South Africa consolidate its outdated legislation and integrate spatial planning with related sector legislation*** to simplify and modernise the country's planning procedures:

- (i) Instead of concurrently replacing multiple legislative instruments, it is advisable to progressively integrate *SPLUMA* (2013) and *NEMA* (1998), followed by the legal frameworks that regulate housing, transportation, and infrastructure (see Sections 7.3.4.iv and 7.3.4.vii).
- (ii) Municipal, provincial, and national authorities will no longer be required to operate within fragmented and overlapping legal frameworks. Instead, citizens, developers, and public institutions can rely on a unified and internally consistent regulatory system for interpretation, implementation, and compliance.

- (iii) Environmental plans will replace traditional zoning schemes and integrate all aspects of a municipality's physical environment into a single, comprehensive document. Environmental visions will replace strategic planning tools and support authorities in defining long-term sustainable development objectives (see Sections 5.3.5.ii and 5.3.5.iii).

Nevertheless, it is important to acknowledge that the Netherlands' *Environment and Planning Act* (2024) is still relatively recent, and the implications of this consolidation and integration remain uncertain (see Section 5.3.4.i). Historically, in the Netherlands, spatial planning was administered at the local level, whereas environmental management was overseen at the national level. This division made legislative reform in the Netherlands challenging (see Section 5.3.5.i).

- **Approval Procedures**

The aim of the *Green Paper* (1999) in South Africa was to accelerate the approval process for development projects (see Section 7.3.5.v). Additionally, Chapter 3 of *SPLUMA* (2013) requires municipalities to establish procedures, formats, and criteria for assessing land-use and development applications. Furthermore, Chapter 6 of *SPLUMA* (2013) indicates that the local municipal planning tribunal must approve all land development proposals before any development can proceed (see Section 7.3.3.iii).

In various national contexts, specific policy and regulatory frameworks are established to enhance the overall quality and efficiency of development application procedures. In Tasmania, Australia, multiple planning approval procedures have been consolidated into a single procedural framework (see Section 5.2.4.iii). The Netherlands has simplified its approval procedures by reducing the number of permit systems required for development from twenty-five to one (see Sections 5.3.4.i and 5.3.5). These include permits for environmental management, conservation, spatial planning, and development (see Section 5.3.5.ii). South Africa currently administers approximately six distinct regulatory permit systems associated with the approval process for development projects (see Section 7.3.5.iii).

It is ***recommended that South Africa consolidate its multiple approval procedures to reduce the number of permits required for a development application***, as demonstrated to be beneficial by the Netherlands (see Section 5.3.5.iii). These benefits include:

- (i) The consolidation of planning approval procedures represents a shift towards a more integrated planning system. This transition fosters consistency across different sectors and improves both vertical and horizontal intergovernmental cooperation. As a result, overlaps between land-use planning approvals and environmental management authorisations are reduced, and legal frameworks are simplified.

- (ii) When submitting a development permit application, the process involves a single, unified submission. It also offers a single appeal mechanism, thereby enhancing efficiency and clarity in planning and assessment procedures. Additionally, administrative costs are lowered for both the state and the public (see Sections 5.2.4.vii–5.2.4.viii).
- (iii) Furthermore, this comprehensive approval system promotes informed decision-making, reduces conflicting viewpoints, and helps align decisions to achieve unified outcomes. Overall, it results in expedited processes and reduced approval durations, thereby alleviating administrative burdens on municipalities.

Nonetheless, local governments in the Netherlands face challenges in adapting to their new responsibilities (see Section 5.3.6). The country has struggled to consolidate environmental management and spatial planning into an integrated framework because of differing approaches and conflicting interests (see Section 5.3.6). However, such integration remains vital in the Netherlands, and South Africa can greatly benefit from this initiative (see Section 5.3.6).

8.3.3 Urban Renewal and Regeneration

Addressing climate change through both mitigation and adaptation has become a dominant priority in global policy-making and research. Furthermore, deploying energy-efficient infrastructure, particularly in the transport sector, has the potential to substantially reduce greenhouse gas emissions and thereby contribute to climate change mitigation. In addition, South Africa is experiencing a housing crisis and continues to face persistent challenges associated with the proliferation and management of informal settlements.

- **Transportation and Climate Change**

During the initial post-apartheid period in South Africa, land-use frameworks were characterised by fragmentation and inadequacy (see Section 7.3.2). As a result, the legacy of apartheid has significantly shaped the development of a spatial planning system that remains fragmented and continues to reinforce patterns of urban segregation (see Section 7.3.6). Creating more connected urban environments that offer equitable access to opportunities and services is a key priority (see Section 7.3.5.ix). However, inefficiencies in transport systems present considerable barriers to addressing spatial fragmentation (see Section 7.3.6). Consequently, the *RDP* (1994) aimed to reconstruct and enhance township infrastructure, which is vital for fostering communities that are both safe and liveable (see Section 7.3.5.ii).

Polycentric cities are urban areas characterised by multiple activity nodes, including mixed-use developments and interconnected hubs, a model applied in Australian cities (see Section 5.2.5.ii). The concept of polycentric cities is also evident in South Africa's major metropolitan regions,

including the Cape Town Region, the Gauteng Region, Johannesburg, and Durban. However, Australia's polycentric cities are defined by collaborative planning, transit-oriented development, and corridor development (see Section 5.2.5.ii), whereas South Africa's polycentric cities feature a core-periphery model, spatial injustice, and post-apartheid restructuring. Australia's polycentric cities are connected by electric rail networks, while intra-city transport primarily relies on bicycles and electric vehicles (see Section 5.2.5.ii). Although South Africa has electric rail systems, such as the Gautrain, intra-city transport primarily relies on private vehicles and minibus taxis.

South Africa is actively reconfiguring its urban areas to improve accessibility through public transport and non-motorised modes, although implementation continues to face significant challenges, resulting in gradual progress. Intra-city transport in the Netherlands also emphasises bicycles and electric vehicles (see Section 5.3.5.iii). The Netherlands has achieved this through an integrated approach that prioritises accessibility over mobility (see Section 5.3.5.iii). To ensure that goals are met, the Netherlands employs pre-implementation controls and post-implementation evaluations (see Section 5.3.5.iii). Brazil is actively enhancing its transport systems to reduce reliance on private vehicles (see Section 6.2.5.ii). Meanwhile, outdated land-use practices hinder India's ability to integrate transport planning (see Section 6.3.6).

Furthermore, South Africa faces challenges in integrating green infrastructure into planning processes due to ongoing conflicts between local perspectives and internationally recognised theories (see Section 7.3.6). To effectively integrate green infrastructure alongside traditional planning approaches, it is crucial to develop long-term strategic frameworks (see Section 7.3.6). Canada maintains national carbon-pricing initiatives, including a carbon tax, to encourage reductions in carbon emissions and to incorporate environmentally sustainable technologies into planning procedures (see Section 5.4.5.i). This approach is similarly adopted in South Africa. In Canada, carbon pricing influences behaviour, whereas in South Africa, its main purpose is revenue generation.

Therefore, it is ***recommended that South Africa utilise carbon tax revenues to invest in renewable energy programmes, particularly to upgrade transportation infrastructure*** to support public transportation and non-motorised modes, thereby further reducing carbon emissions.

- (i) South Africa should establish a clear carbon pricing plan and align it with emissions reduction targets. Carbon-pricing measures should be incorporated into municipal land-use and development plans to ensure compliance, with enhanced monitoring and enforcement to support them.

- (ii) South Africa can require that all SDFs, IDPs, and LUMS align with transport plans to encourage integrated corridor planning, as evidenced by examples from Australia and the Netherlands showing that property markets respond to transport accessibility.
- (iii) Municipal authorities in South Africa should prioritise the development of continuous pavements and protected bicycle lanes as essential parts of their transportation infrastructure. Although South African policies support non-motorised transport, infrastructure shortcomings prevent its implementation, emphasising the gap between policy and practice.

- **Housing and Informal Settlements**

The *NDP* (2012) of South Africa aims to improve all informal settlements, provide housing close to employment centres, and enhance the efficiency of public transport systems (see Section 7.3.5.viii). Section 26 of the *Constitution of South Africa* (1996) affirms the right to adequate housing, significantly influencing spatial planning by imposing an obligation on the government to facilitate housing provision. Given South Africa's ongoing housing crisis, it is crucial to address governmental inefficiencies that might hinder the successful implementation of housing initiatives, such as zoning restrictions and bureaucratic delays (see Section 7.3.6). The goal is to reduce spatial segregation within metropolitan areas by encouraging the development of integrated residential and mixed-use projects (see Section 7.3.5.ix). Additionally, the *Amendment Act* (2024) reaffirms municipalities' statutory mandate to promote socio-economic development (see Section 7.3.4.viii).

Brazil has established special zones of social interest (ZEIS) within zoning plans to promote inclusive development (see Section 6.2.4.ii). These zones are officially designated to improve informal settlements, social infrastructure, and low-income housing. They are statutory instruments incorporated into municipal plans and implemented across all municipalities (see Section 6.2.5.iv). However, housing and urban policies in Brazil have historically been segregated, and integrating ZEIS is therefore challenged by institutional capacity deficiencies across these sectors (see Section 6.2.6). Brazil legally recognises and protects informal settlements as part of urban development, with the main aim of formalising these areas (see Section 6.2.4.ii). In South Africa, informal settlements are recognised through dedicated housing programmes and are seen as transitional zones needing upgrading. South Africa could learn from Brazil's experience by adopting scheme-based protection and formalisation tools rather than relying solely on policy-based programmes.

Therefore, it is ***recommended that South Africa adopt a formalised statutory instrument, such as Brazil's ZEIS, to facilitate inclusive development*** that prioritises the provision of social housing and the upgrading of informal settlements.

- (i) These zones should be officially recognised as a zoning category across South Africa, and all municipal land use schemes need to include them. These zones should provide affordable housing, flexible standards, and streamlined approval processes.
- (ii) Municipal authorities are obliged to prioritise in-situ upgrading as an inalienable legal right and to protect informal settlements from rezoning and displacement. Regions awaiting upgrading should be granted provisional overlay zoning status until community-approved enhancements are implemented.

8.3.4 Digital Planning Platforms

Spatial planning processes are currently undergoing continuous digital transformation. Digital platforms that serve as evaluation and information-exchange systems can enhance the efficiency and effectiveness of spatial planning processes.

- **Evaluation Platform**

The *Constitution of South Africa* (1996) explicitly emphasises the importance of government transparency and the right to access information (see Section 7.3.2). The '*State of Australian Cities Reports*' serve as an annual platform for reporting on urban development-related challenges (see Section 5.2.5.i). The '*State of South African Cities Reports*' functions similarly by reporting on spatial challenges, assessing urban performance, and comparing South Africa's largest cities (SACN, 2021). Furthermore, the Netherlands, Canada, Brazil, India, and Morocco produce similar reports to monitor urban development. India uses a ranking system to assess states' progress towards the Sustainable Development Goals. This system fosters competition and encourages improvements in sustainable development (see Section 6.3.5.ii).

Drawing upon the state of cities reports and the sustainable development ranking system, it is ***recommended that South Africa establish a digital evaluation platform that sets out development goals and evaluates urban progress:***

- (i) The '*State of South African Cities Reports*' should be transitioned from a written document into an online reporting platform. This modification will facilitate more frequent updates to the report. Furthermore, the report scope can be expanded to include all cities in South Africa, rather than being limited to larger cities.

- (ii) The evaluation platform can assess the progress of South African cities towards various development goals by implementing a ranking system. For instance, it can assess cities' progress toward achieving the Sustainable Development Goals. Additionally, cities can be classified according to size and context to ensure equitable assessment.
- (iii) This initiative will encourage competition among municipalities, and the drive to meet development goals will increase. Ultimately, the most innovative ideas could be shared on the evaluation platform to guide future development strategies.
- (iv) This platform will enable authorities to identify which cities require assistance in achieving specific development goals. It can also assist authorities in determining which development goals should be prioritised for certain cities. Furthermore, it can serve as evidence to inform future planning policies and ensure that strategic planning targets the appropriate issues.

- **Information Exchange Platform**

Implementing robust, evidence-based decision-making requires optimising environmental data exchange processes (see Section 7.3.2). The *Climate Adaptation Platform* (2023) of Canada facilitates the exchange of information on adaptation experiences and climate strategies (see Section 5.4.5.vi). Canada's platform operates as a formal national forum and a knowledge-sharing network that integrates various levels of government, industry stakeholders, and communities. In contrast, South Africa lacks a single platform for climate adaptation and instead relies on multiple adaptation frameworks and knowledge networks.

Since empirical evidence indicates that some countries share similar backgrounds, challenges, or frameworks, a successful initiative in one country can be adapted to another country's context and implemented there. An information exchange platform can facilitate the sharing of information on challenges and implementation strategies among countries.

Building on the concept in Canada, it is ***recommended that countries collaborate to establish a global information exchange platform*** to share information on spatial challenges and implementation strategies. An information exchange platform can be structured as follows:

- (i) Cities around the world can share insights on the spatial challenges faced in urban environments and the strategies used to address them. The results of these strategies should be documented, including an evaluation of their effectiveness.
- (ii) Other cities facing similar challenges can then utilise the platform to identify comparable situations, see what actions were taken, and adapt them to their own context for implementation. They can also submit reports to strengthen the platform's credibility.

- (iii) The platform will assist cities in understanding how to address challenges and determine whether they are global or local issues. It can help prevent unnecessary mistakes by guiding others on which solutions are most effective in different contexts.
- (iv) The platform will later be able to identify which cities share the same characteristics and, therefore, face similar planning challenges. This will enable the platform to connect the two cities whenever a planning challenge is entered into the system.
- (v) This will help achieve global development goals such as sustainable development and climate change mitigation more easily and quickly.

8.4 Conclusion

"We can change the world and make it a better place. It is in your hands to make a difference." (Mandela, 2013)

Despite extensive post-apartheid reforms, the South African spatial planning system continues to produce spatial inequality and fragmented development. A comparative analysis with developed and developing countries is needed to assess its effectiveness and inform more equitable and sustainable planning reforms. The recommendations provided in this study could add value to South Africa's spatial planning system and improve the effectiveness of planning practices in addressing the planning problems identified in the problem statement of this study.

The primary aim of this study was to examine the evolution of South Africa's spatial planning practices and to compare South Africa's current practices with those of developed and developing countries. The literature review established the theoretical framework underpinning contemporary planning practices. The empirical investigation evaluated the impact of different practices on sustainability, equity, and urban and rural development, identifying opportunities and best practices from case studies. In addition, evidence-based recommendations were provided to improve the effectiveness of South Africa's spatial planning.

Six case studies were selected, each from a different continent: three developed (Australia, the Netherlands, and Canada) and three developing (Brazil, India, and Morocco), along with South Africa. Each country's planning system was independently assessed and then compared with the others. Evidently, similarities and differences were observed among the seven countries' planning systems. The practices employed in some countries proved valuable for the future of spatial planning in South Africa, while those in others could only serve as lessons. Additionally, some practices appear too advanced for South Africa's context, which may further exacerbate the country's spatial disparities.

Nonetheless, South Africa can learn from how other countries address spatial planning challenges, particularly those of developed countries. In turn, South Africa can provide valuable insights to other developing countries to help address their spatial planning challenges. Overall, spatial planning is constantly evolving, and the physical environment, including its challenges, is changing regularly. Research like this is especially necessary to ensure that planners stay up to date with global trends and challenges. Additionally, countries can learn from one another and adopt concepts that may be effective in their own contexts. The chapters that address the aims and objectives of this study are illustrated in Figure 8.8.

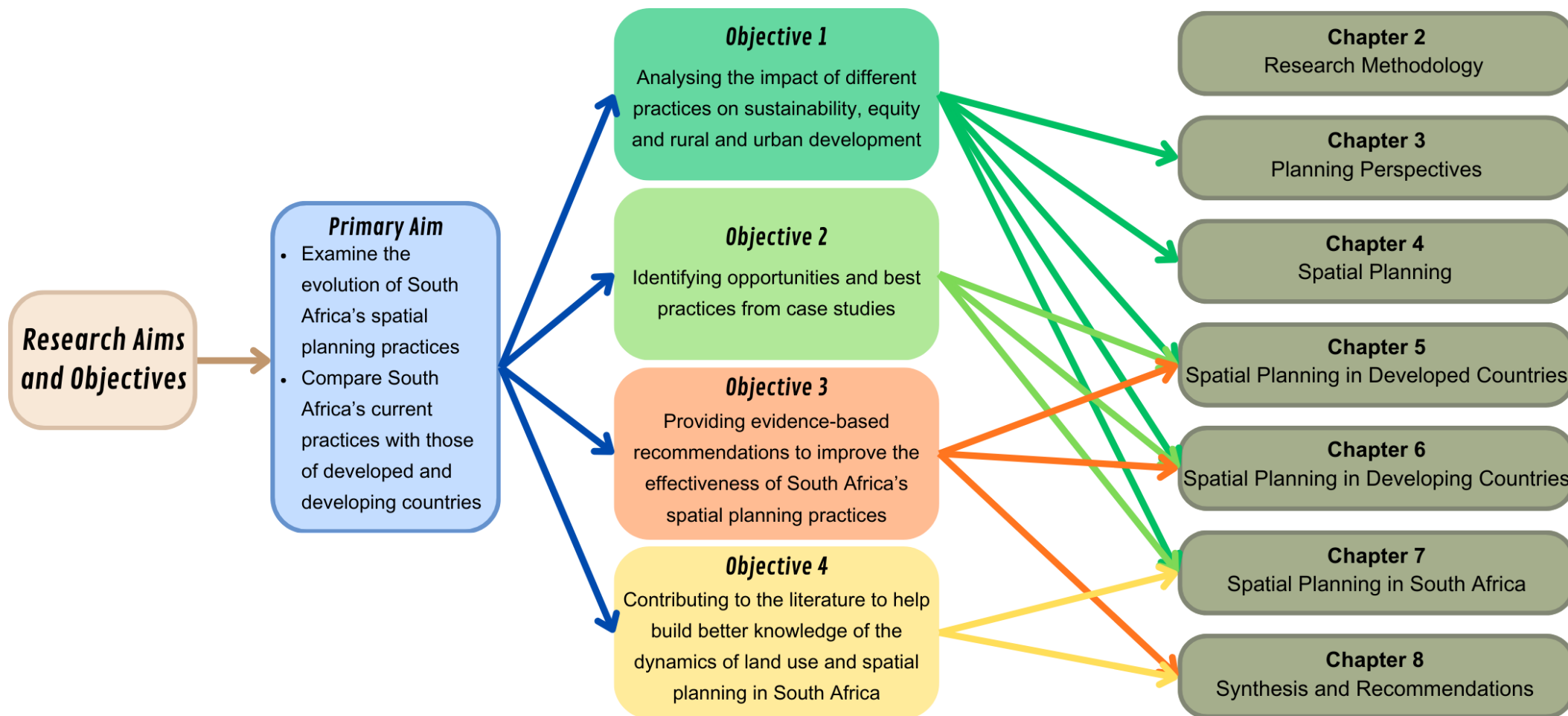


Figure 8.8: Aims and Objectives Addressed

Source: Own construction

8.4.1 Limitations of Research

The following limitations of the study were identified:

- Time constraints notably limited this study and constrained the selection of countries for case studies. Additional time would allow the researcher to analyse the contexts of various other countries and incorporate them as case studies. This enhancement would significantly improve the study's outcomes, as more case studies yield more accurate findings and ultimately provide a more comprehensive representation of planning practices globally. Improved outcomes would also facilitate more precise recommendations for the future development of South Africa's planning practices.
- The capacity of a single researcher was also insufficient to increase the number of case studies for this research. More researchers would have allowed a broader scope and more timely outcomes. The study could have included additional case studies within the available timeframe, providing a more accurate representation of a global perspective.
- The inputs from local planners in each country could have provided valuable insights and strengthened the study. The perspective of planners who understand the context and nature of spatial planning in a specific setting might have yielded more accurate results. This would have enabled the researcher to better assess the conditions that drive these practices and to offer more effective recommendations.
- The researcher was also unable to visit the countries selected as case studies due to financial limitations. Visiting a case study site can enhance a researcher's understanding of the area. Instead, the researcher's perspective and experience are confined to South Africa, which might have introduced bias into the results.

8.4.2 Future Research

In view of the limitations identified in this study, subsequent research building upon this work could investigate the following directions:

- Since the Netherlands contributed most recommendations, subsequent research may expand to include planning practices from other European countries. The planning systems of European countries are notably advanced and may provide valuable insights into how South Africa can improve its own.
- Furthermore, future research could examine the planning systems of African countries, as Morocco has a similar background to South Africa. Both Morocco and South Africa have histories deeply rooted in colonial and apartheid practices, which have left both countries with

disadvantaged communities. Other African countries may share similar historical contexts and provide valuable insights for South Africa.

- Furthermore, it is advisable for future research to concentrate on cities as case studies within countries rather than on the entire country. The findings indicate that local planning is of critical importance and that urban contexts vary considerably, even within the same country. Direct comparisons of cities will also produce more precise results.
- Collaborating with researchers from other sectors related to spatial planning, such as environmental management and transport planning, could be valuable for future research since these sectors are interconnected. Therefore, including experts from related fields in future studies may help ensure that the perspectives of these areas are accurately represented in spatial planning.

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