

Flexibility Versus Certainty in Planning: A Critical Review of Cross-Boundary Spatial Planning Systems and Practices

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1. Introduction

The idea of urban planning and the plan-making process goes back to ancient times. It has been a culture throughout the civilizations to export and import planning ideas, going through the plan-making process, housing, land & property rights entitlement (Healey, 2013). Spatial planning is conceived to be synonymous with the systems and practices of urban planning. It is an interdisciplinary measure with cross-cutting coordination of sectoral practices and policies affecting spatial organization (Reimer *et al.*, 2014; Van Assche *et al.*, 2013, Das, 2020). As the world progresses with the continuous improvement in technologies, the change in lifestyle and economic growth has driven a significant change in the overall spatial planning system around the world. Throughout the world following the contemporary setting of land-use practices, entire planning systems progressively function within uncertainty amid multifaceted challenges of climate change, housing and food shortages, demand for sustainable

transportation, ageing population and so on (Steele & Ruming, 2012). New concepts of the clean environment have forced us to find new ways to interpret the values of city design and urban planning (McCann, 2011; McCann & Ward, 2013; White & Allmendinger, 2003). To meet up the changes and growing challenges arising out of continued changes throughout the world, different countries have adopted distinctive planning policy reformation and circulation. However, being a highly politicized element, planning has always been the core public policy concern of the globe (Gurran, Austin, & Whitehead, 2014; Gurran, Gallent, & Chiu, 2016).

Several researchers have acknowledged comparative analysis as a tool for problem-solving and bringing in new ideas into the existing systems. Comparative analysis can prompt new questions and policy initiatives, broaden the knowledge and learning from the experiences (Cullingworth, 1993; Masser, 1990; Sewell, 1967; Wolman, 1985). Hence, a cross-national comparative investigation of spatial planning systems and processes can interpret and transfer experience across nations transcending national cultural boundaries. However, despite each country's spatial planning process being unique by characteristics, and has been proven beneficial for that country, the requirements for a skeleton spatial planning system to produce optimal economic, social and spatial outcomes have remained a mystery and largely been unexplored.

In this connection, this research has critically argued that a vigilant combination of flexibility and certainty in spatial planning can bring about the most optimum planning outcomes. Therefore, to reproachfully evaluate the core argument, this research has tried to empirically respond to the research question of which balance of government intervention and market freedom produces the optimal economic, social and spatial outcomes. This research question has been further translated into an associated central hypothesis i.e., a hybrid planning system with an optimal balance between discretionary and regulatory planning approach can bring

about the desired economic, social, and spatial outcomes. A vigilant descriptive case study-based research approach is adopted to scrutinize the central hypothesis connecting the theory with practices. In essence, this research has made a comparative autopsy of the spatial planning system and practices in the United States (US), United Kingdom (UK) and Hong Kong (HK) to address the ever-burning subject issue of balancing government intervention and market freedom to produce the optimal economic, social and spatial outcomes. These three countries have been selected as the basis for comparative cross-national planning studies due to their inherent reciprocal as well as independent distinctive characteristics of planning systems i.e., US and UK planning system reflects regulatory certainty and discretionary measures as core planning intention and practices consecutively whereas the HK planning system reflects a hybrid planning system with an optimum mix of certainty and discretionary measures in spatial planning systems. As comparative analyses on spatial planning systems and processes are highly complex, it has been tried to focus on micro and macro-level views of the urban planning and governance of the selected countries.

2. Comparative Cross-Boundary Planning Systems & Practices: A Critical Review

In the real world, a careful combination of regulatory zoning and discretionary systems characteristics has been seen in many planning systems. There always exists a frequent contradiction between two notions or planning models of “performing” (discretionary) and “conforming” (regulatory zoning) systems within the planning literature, but history reveals that regulatory certainty (zoning) has seldom brought certainty. Rather it has frequently positioned flexibly. In the same way, the growing need for sustainable urban development and balanced growth of the economy has led to discretionary, rigid, inflexible planning systems which further fails to achieve strategic policy goals (Cullingworth, 1993; Cullingworth & Nadin, 2006; Rivolin, 2008; Steele & Ruming, 2012). Table 01 & 02 consecutively illustrates

the side-by-side comparison between the two planning models under consideration as well as their key advantages and disadvantages.

Table 01: Two Distinctive Representations of Spatial Planning Systems

| Issues | 'Performing' (Discretionary) | 'Conforming' (Regulatory) |
|-----------------|--|-------------------------------------|
| Core Principles | Horizontal and Vertical subsidiarity | Hierarchical |
| Function | Strategic flexibility through discretionary planning | Regulative certainty through zoning |
| Scale | Regional, National, Supra-national | Local |
| Role of plan | Strategic | Regulative |
| Pros | Flexibility in Planning | Certainty in Planning |
| Cons | Discretionary in nature | Certainty & Rigidity |
| Examples | The US and most of the European countries | New Zealand, UK, European Union |

(Source: Adapted from Rivolin 2008; Steele & Ruming, 2012)

Table 02: Advantages and Disadvantages of Discretionary and Regulatory Spatial Planning Systems

| Issues | Discretionary Planning System | Regulatory Planning System |
|---------------|--|--|
| Advantages | A certain degree of flexibility | Certain and reliable decision-making |
| | Subjective decision-making and receptive to distinct circumstances | Objective decision-making and avoidance of conflict |
| | Rapid plan-making | Faster planning applications |
| Disadvantages | Arbitrary, unreliable, and uncertain decision-making | Inflexible decision-making and little room for negotiation |
| | Inherent potential for conflict in planning decision making | Unresponsive to individual and community |
| | Slower planning applications | Slower plan-making |

(Source: Adapted from Carmona *et al.*, 2003; Steele & Ruming, 2012)

Hence, considering the above scenario, the planning ambition has always remained a balance between efficiency (certainty) and the need for planning flexibility. In this essence, the Hybrid planning system is an effort to simultaneously encompass certainty and flexibility in planning. To exemplify, ‘flexible zoning’ in the US (Elliot, 2008), a more plan-led discretionary performance-based approach to planning in the UK (Carmona *et al.*, 2003) or a hybrid planning system in HK integrating a plan-led system with greater regulatory certainty and flexibility in planning decision making. The following section will highlight the core characteristics of the spatial planning systems and practices of these three countries.

2.1 Spatial Planning Systems & Practices in the United Kingdom (UK)

The UK's spatial planning system acts as a positive place-making contributor. It not only addresses the spatial inequalities and visions for future places but also facilitates sufficient infrastructure, allocates lands, regenerates urban areas, conserving the built and natural heritage etc. Concisely, it prompts sustainable arrangements for space to placemaking. The plan-making process of the UK follows a Top-down approach with sufficient room for effective public participation in the planning decision making. The planning hierarchy of the UK is illustrated in Figure 01.

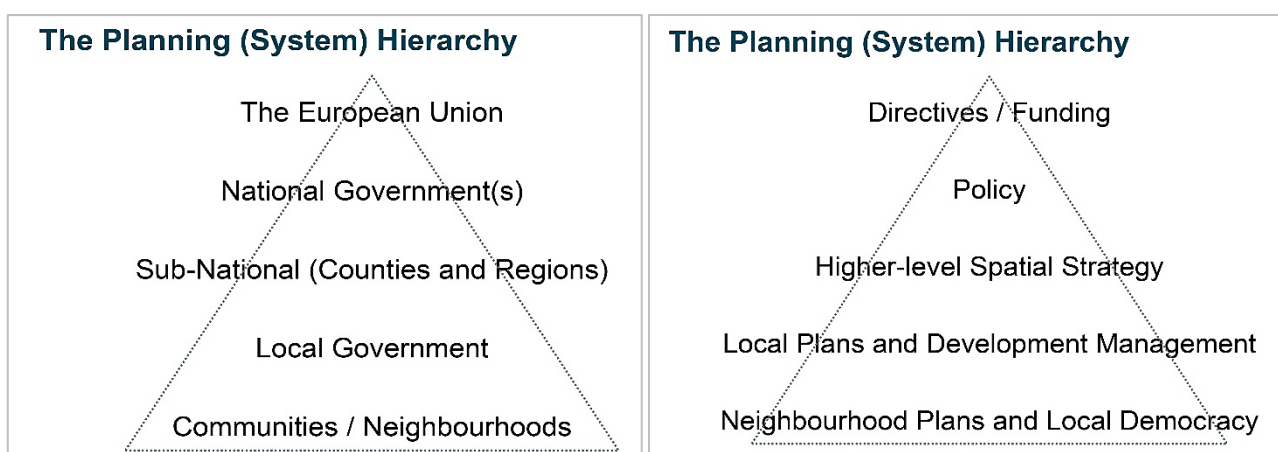


Figure 01: The Planning Hierarchy of the UK

(Source: Gallent, 2021)

The Ministry of Housing, Communities and Local Government is the capital planning authority of the UK. The national government sets the policy frameworks for spatial planning. These policy frameworks further guide the local authorities (Gallent, 2021). The planning policy and practice of local government focus more on development planning and management (Adams & Watkins, 2002). The role of local government is to provide a basis of discretionary decision making through indicative plans that conforms to national policies. They also ensure local democracy through the involvement of local interests (ODPM, 2002; Scottish Executive, 2002). Other than focusing on land-use plans, local development plans focus on spatial planning. Local Planning Authorities (LPA) are required to produce a local plan for their administrative area keeping a vision for the next 15-20 years. Each local plan has a spatial vision for future development along with strategic objectives. They take account of every possible aspect of a location, ranging from housing, health, employment to climate change mitigation and heritage conservation (Gallent, 2021). Recently the UK has been trying to move from the 'predict and provide' approach in housing schemes and preparation of a Regional Planning Guidance (RPG) is a requirement. All RPGs are needed to take account of current household conditions, supply, land availability as well as the environment. RPGs empower the central government and are set by the context of development plans (White & Allmendinger, 2003). Though the UK has been trying to devalue its governmental function, planning activities remain centralized and uniform (Allmendinger, 2001). The power to shape the policies is still in the hands of the central government (Allmendinger, Morphet, & Tewdwr-Jones, 2005).

2.2 Spatial Planning Systems & Practices in the United States (US)

The spatial planning system is very comprehensive in the US. The spatial planning process in the US has largely been a local phenomenon and it is derived from the federal system rather

than the central government (Cullingworth, Caves, Cullingworth & Caves, 2013). The planning hierarchy of the US is demonstrated in Figure 02.

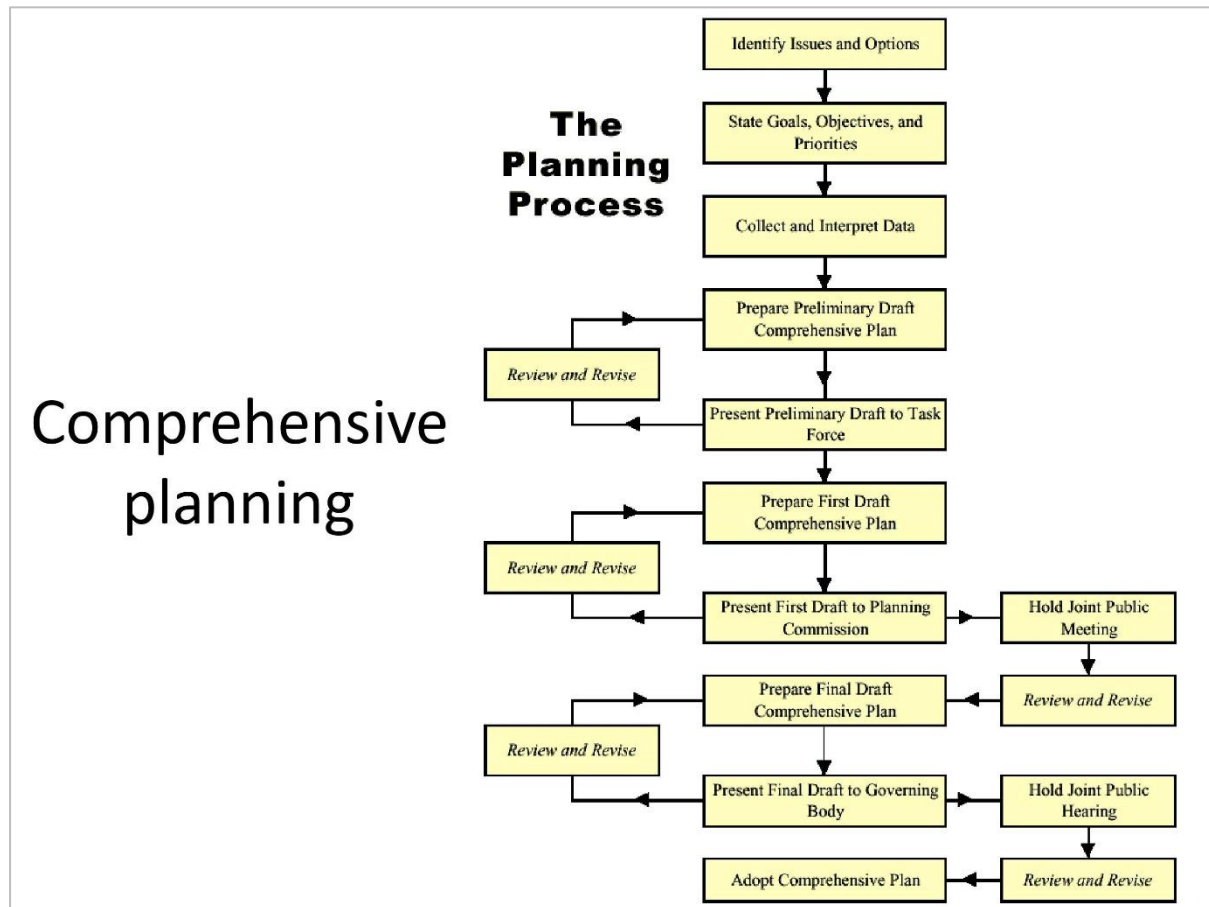


Figure 02: The Planning Hierarchy of the US

(Source: Zhou, 2021)

While practicing a comprehensive planning system, it has been tried to build consensus through major stakeholder participation and using the emancipatory knowledge provided by the stakeholders in the US planning system. The participants' concerns are heard and taken very seriously. Most importantly, all participants know each other's concern and interest and can choose options by exploring all the interests. The quality discourse of comments received from the public participation is ensured by sharing and disseminating enough knowledge or information of all the participants or stakeholders. The comprehensive planning process is so local that its contents vary from place to place (Zhou, 2021). Due to an absence of national

policy guidance in the US spatial planning systems, individual US States have the right to restrict sub-urban growth (White & Allmendinger, 2003). The US States like Hawaii, Oregon, and New Jersey have already restricted sub-urban growth for the sake of environmental protection and urban sprawl. These examples prove that local authorities heavily rely on zoning and sub-divisions, despite having other development control measures in action (Cullingworth, 1997; Haar, 1996). In a nutshell, the US approaches regulatory planning through centralized oversight, transparency and accountability, impact analysis and smarter regulation (Beck, n.d.).

2.3 Spatial Planning Systems & Practices in Hong Kong (HK)

Hong Kong follows a hybrid planning system ensuring a balance between certainty and flexibility. In Hong Kong (HK), town planning primarily aims to promote the welfare of the community. Through strictly guiding and controlling the land use and developments, Hong Kong's overall spatial planning process tries to deliver desirable places for living in a more organized way utilizing a three-tier planning hierarchy i.e., Territorial, Sub-regional and local as illustrated in the planning hierarchy of Hong Kong (Figure 03). At the strategic level, Hong Kong follows a territorial strategic policy i.e., Territorial Development Strategy (TDS) to provide a long-term planning framework for directing the lower-level planning authorities whereas district plans focus more on detailed land-use planning. At the sub-regional or district level, there is a schematic spatial plan and district concept plan which prescribes development proposals at the district level. At the local level, Hong Kong has adopted a broader spatial development plan known as outline zoning plans (OZP) and Development Permission Area Plan (DPA) (Chui, 2021). All of these development plans in HK followed the statutory requirements and procedures of the Town Planning Ordinance. The building authority was empowered to enforce the zoning plans mentioned in the broader development plan (Bristow, 1984). Being flexible and non-statutory, Hong Kong's planning standard and guidelines do not

enforce statutory land-use zoning plans, rather enforcing the land-use zoning plans rely on the building authorities (Gurran *et al.*, 2016).

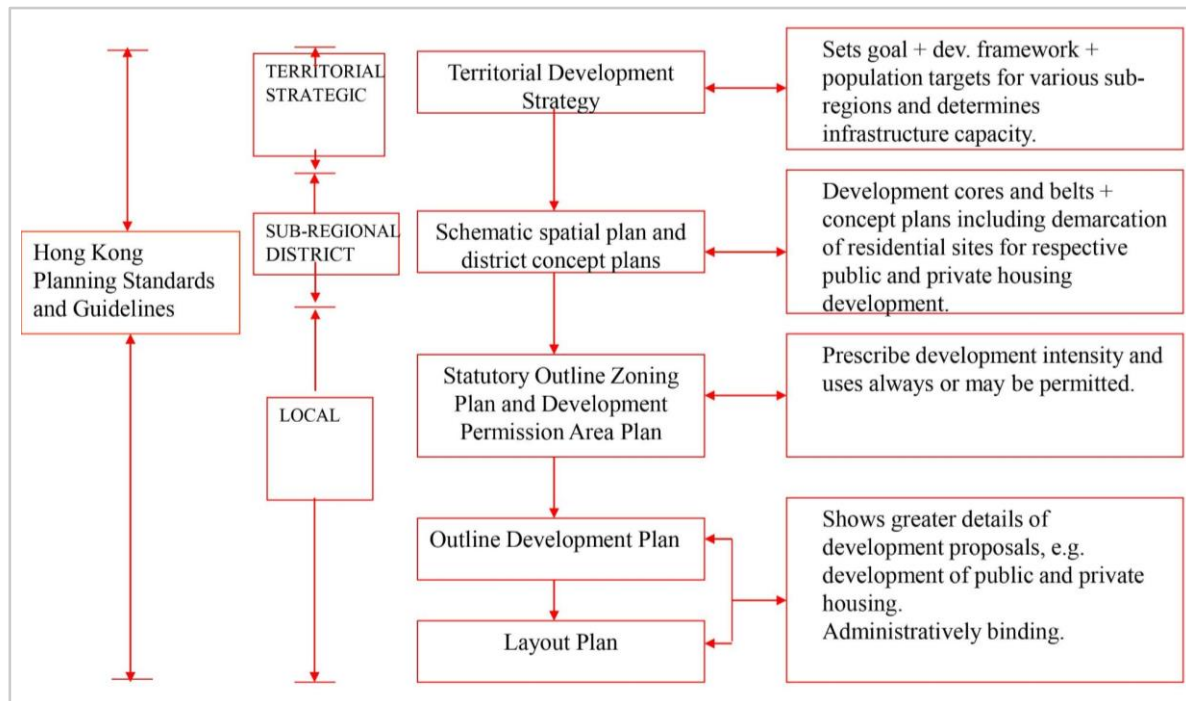


Figure 03: Hierarchy of Plans in Hong Kong

(Source: Chiu, 2021)

2.4 Comparative Cross-Boundary Spatial Planning Systems & Practices

The following section will summarize a comprehensive analysis of the spatial planning systems and practices of the US, UK and HK by comparing key indicators as spatial planning policies and strategies, planning hierarchy & governance system and so on side by side. The planning system of the US, UK and HK takes account of the similar problems in different institutional responses. However, as each country's spatial planning system is intrinsically sophisticated, the complexity of achieving their planning intentions and approaches are ever-increasing. The comparative scenario among the three countries spatial planning systems and processes are illustrated in Table 03.

Table 03: Comparative Scenario Among Three Countries' Spatial Planning Systems and Processes

| Issues | US | HK | UK |
|---|--|--|---|
| Government Structure and Planning Practices | Federal Government | Central/Local Government; for London, the Greater London authority | Hong Kong Special Administrative Region (HKSAR) |
| Spatial Planning Policies and Strategies | Absence of National Urban Policy; the responsibility lies on the state government | Town Planning Ordinance (TPO), 1939 and its several amended versions. The latest one is Town Planning (Amendment) Ordinance 2004 | Town and Country Planning Act 1990 and Localism Act 2011 is the National legislation for the UK. National Policy Framework 2012 is implemented by local authorities |
| Legislation | 3 C's (Federal/National level) State Government e.g., New York City Council | HK Legislative Council | The Ministry of Housing, Communities and Local Government |
| Review and approval | Project-Based | Plan-Based | Case-by-Case Based |
| Time Horizons | 20 Years | 30 Years (From 2000 to 2030) | 15 Years |
| Public participation | Mandatory and Promoted active Participation | Extensive and Proactive Public Involvement (a multi-stage, proactive approach) | Active participation of the community & development actors |
| Jurisdiction | Whole State (NYC) | Whole HK | The whole UK |
| Reference Plan | One NYC | HK 2030+ | Regional Spatial Strategies |
| Contents/ structure | Housing and Neighborhoods Energy Air Quality Solid Waste Climate Change Cross-Cutting Topics Parks and Public Space Brownfields Waterways Water Supply Transportation | The National Dimension The Changing Economy The Desired Living Environment Defining Our Needs A vision for the Future Population Dynamics | Positive Place Making Minimizing spatial inequalities Conservation of Heritage Sustainable Space Arrangement |

(Source: Author, 2021)

2.4.1 Government Structure and Planning Practices

The national government of the US has 50 states and a federal district (Gilbert *et al.*, 2016). The federal government of the US has been separated into three important branches to ensure equal power. The laws are prepared by the Legislative division, while it is carried out by the executive branch. The judicial division has been given the authority to evaluate the laws (USA_Government, n.d.). Whereas the UK has a centralized government system, known as Her Majesty's Government (Directgov, 2012).

The urban policy and planning of the US and UK have two separate dimensions. Being a centralized government, the UK strictly follows their national legislations in their urban planning and process. In the modern planning system of the UK, the responsibility of plan-making and managing urban development is beset upon the Local Planning Authorities (LPAs). Development planning in the UK is a downstream of national policies as well as strategic planning and it acts as an upstream of neighbourhood planning (Gallent, 2021). Through the recent Regional Planning Guidance (RPG), the central government has given the power to the local authorities for their plan-making and implementation. However, the US planning system lacks a top tier national planning policy unlike the UK (White and Allmendinger, 2003). It accommodates cross-agencies and cross-sector federal initiatives. As outlined by the Federal Government, the administration is trying to empower and maximize the power of metropolitan areas (OECD, 2017). On the other hand, Hong Kong strictly follows its national guideline for land use and development plan empowering the local authorities and maximizing their potential. Under the three-tier planning system, Hong Kong has a Territorial Development Strategy or Strategic Plan (e.g., HK 2030+) which outlines long-term strategic direction which is further translated into bottom tier district and local level plans (Chui, 2021). To sum up, regarding the Government Structure and planning practices, for an effective spatial planning

system to bring about optimal economic, social and spatial outcomes, there should be top tier national-level policies or strategic planning to bestow the long-term strategic direction which should be further translated into local plan to ensure better synchronization of development initiatives between national and local level.

2.4.2 Spatial Planning Policies and Strategies

The plan-making process of the UK follows a top-down approach with an effective scope of participatory planning and public participation. The Ministry of Housing, Communities and Local Government is the capital authority of planning for the UK. The national government sets the policy frameworks for planning. These policy frameworks guide the local authorities. Currently, there are no higher-level plans like strategic planning in the UK spatial planning system to guide the local plans. The last country-level plan came into force back in 2004 and regional spatial strategies or subnational strategic planning was discontinued after 2012. This lack of strategic planning tends to maze people. Though Local Enterprise Partnerships (LEPS) coordinate investments and voluntary partnerships support the business, there is no formal planning for that. The planning policy and practice of local government focus more on development planning and management. The role of local government is to provide a basis of discretionary decision making through indicative plans that conforms to national policies. They also ensure local democracy through the involvement of local interests. Local Planning Authorities (LPA) are required to produce a local plan for their administrative area keeping a vision for the next 15-20 years. Each local plan has a spatial vision for future development along with strategic objectives. They take account of every possible aspect of a location, ranging from housing, health, employment to climate change mitigation and heritage conservation (Gallent, 2021).

In contrast, there is an absence of an overarching system for spatial planning in the US solely because of its constitution (Elliot, 2008). But local governments hold a strong self-organization principle to carry out overall comprehensive planning at the local level. Though local government's existence relies on State legislation, the constitution strictly does not allow the state government to interfere in any of the local government urban planning affairs (Merriam, 2004, Platt, 2003). Meanwhile, in Hong Kong, Town Planning Ordinance (TPO), 1939 and its several amended versions (the latest one is Town Planning (Amendment) Ordinance 2004) is the National legislation for the spatial planning system and process. It acts as the basis for the overall planning system in Hong Kong. Alongside, Territorial Development Strategy (Top tier Strategic plan in HK) sets the strategic visions and provides an enduring planning framework for the incorporation of different national government land use, infrastructure development, transport, environmental policies matters and so on (Chiu, 2021).

In essence, there should be an overall legal framework that sets out the accountability for the planning authorities to support the plan-making processes, development controls, planning implementation and so on. A hybrid planning system containing both regulatory certainty and flexibility characteristics, establishing a well-established hierarchy and clear classification of plans, strengthening plan implementation and enforcement measures can be proved efficient to generate desired planning outcomes.

2.4.3 Public Participation in the Planning Process

In the planning process of the US, it is mandatory to include the concerning stakeholders. The planning process takes account of the public hearing in several stages as illustrated in figure 02 and prepares a comprehensive plan using prompt active public participation (Zhou, 2021). Similarly, the UK's planning system accounts for private land ownership. It not only empowers the lowest tier of the authority but also extracts significant inputs from community and

development partners (Gallent, 2021). In the planning process of the HK, public participation is considered as an approach towards transparency. The planning system allows the citizens to support, object or comment on each planning initiative. Even they can report against the responsible authority if there is any violation of the planning control (Chiu,2021). The policy and plan-making process may have been different in each of the chosen countries, but no matter what planning process they follow, they ensure active public participation in their plan-making process. This allows the Authorities to create a sense of belongingness to the stakeholders, and this sense of belongingness is one of the key features of the accomplishment of each distinctive planning process.

2.4.4 Learning from the Drawbacks: Bridging the Flaws to Explore Improvement Options

Spatial Planning (Urban planning) and plan making has always been a complex phenomenon and there is no single planning system available that can solve this complexity. Using discretionary measures, the UK has over-accommodated the same chain shops and eateries all around. Rather than being merely functional or utilitarian, the UK's built environment expresses the values of the society. Though it has been ages since the Town and Country Planning Act (1947) was approved, the principles of this act remain unchanged, apart from some added layer of complexity. These complex layers affect the planning hierarchy and their approach towards achieving individual goals of the UK's spatial planning system. (Gallent, 2021). Inversely, the US empowers the local governments to practice land-use planning and zoning using a comprehensive planning process. But due to the political backlash and other strong legal legislation of the US States, zoning plans of the local governments fail to exert power (Babcock, 1966). However, due to the bindings to defend the plans legally, in terms of the health and safety of the citizens, local governments most often find it very difficult to link the rights of individual citizens (Elliot, 2008, Jacobs, 1998). These flaws of two completely

different urban planning processes (regulatory and discretionary planning systems in the US and UK consecutively) proves that neither of the planning process (both discretionary and regulatory comprehensive planning process) can be taken as a skeleton for the optimum planning output. Hence, a balance of these two processes (i.e., A Hybrid spatial planning system) can bring along desired planning outcomes.

2.5 Summary of Findings

To summarize the overall findings, Comparing the planning system in the US, UK and HK, the results suggest that many of the nation's adopting performance-based discretionary planning systems finally have either to abandon it for the heavy administrative burden or to typically hybridized with traditional zoning methods. Most importantly the summary finding points to the fact that different hybrid forms of spatial planning systems and practices responding to the local circumstances can augment both regulatory certainty and flexibility in planning including the planned discretionary systems, use of flexible zoning, and promotion of non-binding policy measures that can 'perform' a collective spatial strategy.

3. Concluding Remarks

To conclude, the outcome of the hypothesis testing through the comparative case study approach has pointed most importantly out that a hybrid planning system with an optimal balance between discretionary and regulatory planning approach can bring about optimal economic, social, and spatial outcomes. Enhanced public participation and transparency can be ensured in integrated into different levels of planning. Encouraging bottom-up participatory planning approaches can allow the public and wider stakeholders to actively participate in the planning decision making which ensures greater accountability to the citizens. An optimal balance between public and private intervention through a certain degree of market freedom and government intervention can be amalgamated to encourage and ensure effective

participation and shared responsibility of both parties to carry about desired planning outcomes. This partnership will stimulate sharing the financial burden, enhance economic progress and improve the market efficiency of the concerned nation. Moreover, the wider sustainability issues should be highlighted in the planning decisions through adapting sustainability and livability as the core planning intention and purpose. In a nutshell, a plan-led system with regulatory certainty and flexibility in planning decision making as well as integrating wider public participation, an amalgam of public and private sector intervention for shared responsibility and introducing sustainability as the core planning intention can improve the overall planning system's effectiveness and produce optimal economic, social, and spatial outcomes consequently.

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