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Testing comparative spatial planning studies in the Latin American context: theoretical implications and challenges for regional development

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Abstract
Until recently, comparative spatial planning research had mostly focused on the European continent. Since the end of the 1980s, a growing number of studies contributed to the proliferation of theoretical and methodological approaches, as well as to a further definition of the object of study. Comparisons focusing on other parts of the World are much less frequent, if one excludes the rather 'dry' reports produced by international organizations. Aiming at investigating the reasons behind this empirical gap, the paper inquires the theoretical implications and challenges that emerge when applying to the global South conceptual and analytical frameworks developed in the Northern hemisphere. In so doing, it first raises awareness on the role played by the colonial legacy to then argue for the need to 'go beyond technical efficiency' and to consider dominant power relations hidden by the apparent neutrality of spatial governance and planning systems, particularly in relation to contexts where spatial inequalities are more pronounced. In this light, it suggests to consider informal practices alongside formal ones, as a way forward to better understand the drivers structuring spatial governance and planning systems in the Global South. Overall, to test comparative spatial governance and planning studies to the Latin American context could provide an added value for the development of the region, by setting up a regional agenda for more integrated and cooperative spatial planning in Latin America.
Keywords: Spatial planning systems. Comparative analysis. Regional development. Global South. Latin America.

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Testar estudos comparativos de planeamento territorial na América Latina: implicações teóricas e desafios para o desenvolvimento regional

Resumo

Até ao momento, os estudos comparativos de planeamento territorial têm-se foco predominantemente no continente europeu. Desde o final da década de 1980, um crescente número de estudos tem contribuído para a proliferação de abordagens teóricas e metodológicas, bem como para uma melhor definição do objeto de estudo. Ao mesmo tempo, a comparação orientada a outros países do mundo é menos frequente, se excluídos os 'estéreis' relatórios desenvolvidos por organizações internacionais. Com enfoque na investigação das razões por detrás deste vazio empírico, o artigo analisa as implicações teóricas e os desafios que emergem quando se aplicam no Sul Global estruturas conceptuais e analíticas desenvolvidas no Hemisfério Norte. Para fazer isso, o artigo enfatiza o papel do legado colonial e, em seguida, argumenta a necessidade de 'ir além da eficiência técnica' do planeamento e considerar as relações de poder dominantes escondidas por trás da aparente neutralidade dos sistemas de planeamento e governança do território, particularmente em contextos onde as desigualdades espaciais são mais profundas. Nesse sentido, o artigo sugere considerar as práticas informais paralelamente às formais, como uma maneira de entender melhor os elementos que estruturam os sistemas de planeamento territorial e governança no Sul Global. Em suma, testar estudos comparativos de planeamento territorial na América Latina pode oferecer um valor agregado ao desenvolvimento regional, estabelecendo uma agenda regional para um planeamento do território mais integrado e cooperativo.

Palavras–chave: Planeamento territorial. Estudos comparativos. Desenvolvimento regional. Sul Global. América Latina.

Testar los estudios comparativos de planificación del territorio en América Latina: implicaciones teóricas y desafíos para el desarrollo regional.

Resumen

Hasta la fecha, los estudios comparados de planificación territorial se han enfocado prevalentemente en el continente europeo. Desde el final de los años '80, un creciente número de estudios han contribuido a la proliferación de abordajes teóricos y metodológicos, así como a una mejor definición del objeto de estudio. Al mismo tiempo, la comparación orientada a otros países del mundo es menos frecuente, si se excluyen los 'estériles' reportes desarrollados por las organizaciones internacionales. Enfocado a investigar las razones que están detrás de este vacío empírico, el artículo analiza las implicaciones teóricas y los desafíos que emergen cuando se aplican en el Sur Global estructuras conceptuales y analíticas desarrolladas en el hemisferio Norte. Para hacer esto, el artículo hace hincapié en el rol que desarrolla el legado colonial, para luego argumentar la necesidad de 'ir más allá de la eficiencia técnica' de la planificación y considerar las relaciones dominantes de poder escondidas tras la aparente neutralidad de los sistemas de planificación y gobierno del territorio, en particular en contextos donde las desigualdades espaciales son más pronunciadas. En este sentido, el artículo sugiere considerar las prácticas informales paralelamente a las formales, como manera para entender mejor los elementos que estructuran los sistemas de planificación y gobierno del territorio en el Sur Global. En definitiva, testar los estudios comparativos de planificación territorial en América Latina puede ofrecer valor añadido al desarrollo regional, estableciendo una agenda regional para una planificación del territorio más integrada y cooperativa.

Palabras clave: Planificación territorial. Análisis comparativo. Desarrollo regional. Sur Global. América Latina.

1 Introduction

The wording spatial governance and planning is generally used to refer to the heterogeneous set of theories and practices focusing on the regulation, management and development of space, as well as on the improvement of human well-being therein (Allmendinger &Tewdwr-Jones, 2002, Hall & Tewdwr-Jones, 2019). This activity mostly developed in the last century in modern states, in the form of legally established objectives, tools, and procedures that follow constitutional rights. In this light, when referring to a spatial governance and planning 'system' the main disciplinary literature means the institutional frameworks allowing, managing and regulating the spatial organization of a society within a State, through multiple, complex processes of vertical (between policy levels) and horizontal (between policy sectors and between public and private subjects) interactions (Janin Rivolin, 2012). Importantly, spatial governance and planning systems are context-dependent, i.e. firmly anchored to, and dependent on the peculiar institutional, administrative, cultural and socioeconomic characteristics of the countries and regions that instituted them. At the same time, due to the fact that these characteristics as well as the challenges in response to which these systems exist change over time, they behave as time-contingent, dynamic objects, that evolve as a results of a variable set of internal and external drivers of change (Cotella, 2009).

The differential evolution of spatial governance and planning systems has been paralleled by an increasing attention from policy-makers and academics, interested in comparing how this activity operates in the different institutional contexts. This has been particularly true for what concerns the European continent where, as a consequence of the progressive integration of the various country into an unprecedented supranational institutional entity, the interest for comparing and sharing knowledge and (good) practices grew exponentially. As a consequence, since the end of the 1980s, a growing number of studies contributed to the proliferation of theoretical and methodologies approaches, as well as to a further definition of the object of study (Davies et al., 1989, Newman & Thornley, 1996; CEC, 1997; Larsson, 2006; ESPON, 2007; Nadin & Stead, 2008; ESPON, 2019, Berisha et al., 2020).

Whereas comparative spatial planning studies are widespread in the European continent, however, comparisons focusing on other parts of the World are much less frequent, if one excludes the rather dry reports produced by international organizations (e.g. Cities Alliance, 2017). This is in particular true when looking at the so-called Global South[1], where countries' institutional frameworks are generally considered more fluid and unstable. Aiming at investigating the reasons behind this empirical gap, the present contribution inquires the theoretical implications and challenges that emerge when attempting to apply to the Global South conceptual and analytical frameworks developed in the Northern hemisphere

[1] "The term Global South functions as more than a metaphor for underdevelopment. It references an entire history of colonialism, neo-imperialism, and differential economic and social change through which large inequalities in living standards, life expectancy, and access to resources are maintained" (Dados & Connell, 2012, p.13).

to explore and compare spatial governance and planning systems and their evolution.

The authors first introduce the academic debate that has developed since the 1990s, mainly in Europe, in relation to comparative spatial planning studies. On this basis, they build on historical institutionalist theories to critically raise awareness on the role played by the colonial legacy in the evolution of Latin America spatial governance and planning systems. When doing so, the contribution argues for the need to 'go beyond technical efficiency' and to consider dominant power relations hidden by the apparent neutrality of spatial planning systems (Servillo & van den Broeck, 2012), particularly in a Southern context where spatial inequalities are more pronounced. Section four then suggests that, in order to further identify and explore these hidden relations, informal practices should be considered alongside formal ones, as a way to better understand the main drivers structuring spatial governance and planning systems in the Global South. The implications of the presented information for a Latin American regional development and planning agenda as a platform through which to further contextualize international influences are presented in section five. A concluding section rounds off the contribution, summarizing the main arguments of the paper and pointing out how to test comparative spatial governance and planning studies to the Latin American context could "feed back to the growing and diverse international 'pot' of planning theories and concepts" (Watson, 2016, p.39), in so doing providing an added value for the development of the region by setting up a regional agenda for more integrated and cooperative spatial planning .

2 Comparative spatial planning studies. A European business?

Apart from earlier essays in the field of economic and regional planning (e.g. Hoffman, 1972), comparative research on spatial planning began rather recently, in the context of the European integration process. Since the end of the 1980s, an increasing number of studies applied different approaches and methodologies, contributing to the understanding of commonalities and differences among European countries, and to the elaboration of an international comparative planning methodology[2]. The main, large scale comparisons that have interested the European continent until now are summarized in Table 1.

[2] Comparative methods have also benefitted from the large number of studies into other aspects of public policy in Europe stimulated by growing integration in a number of policy sectors (Hantrais, 2009).

Table 1 – Main typologies of spatial governance and planning systems in Europe

Davies et al, 1989[1]		**Common law** England		**Napoleonic codes** DK, DE, FR, NL	
Newman & Thornley, 1996	**Nordic** DK, FI, SE	**British** IE, UK	**Germanic** AT, DE	**Napoleonic** BE, FR, IT, LU, NL, PT, ES	
CEC, 1997[2]	**Comprehensive integrated** AT, DK, FI, DE, NL, SE	**Land use regulation** IE, UK (+ BE)		**Regional economic** FR, PT (+ DE)	**Urbanism** GR, IT, ES (+PT)
ESPON Project 2.3.2[3]	**Comprehensive integrated** AT, DK, FI, NL, SE, DE (+ BE, FR, IE LU, UK) BG, EE, HU, LV, LT PL, RO, SL, SV	**Land use regulation** BE, IE, LU, UK (+ PT, ES) CY, CZ, MT		**Regional economic** FR, DE, PT, (+ IE, SE, UK) HU, LV, LT, SK	**Urbanism** GR, IT, ES CY, MT
Berisha et al., 2020[4]	**State-led systems** DK, FR, FI, IE, IS, NO, SE, UK	**Market-led systems** AT, CH, EE, CZ, DE, LT, LV, NL, SI, SK	**Conformative systems** BE, BG, ES, GR, HR, HU, IT, LI, LU, RO, PT, TR	**Proto-conformative systems** AL, BA, MK, ME, RS, XK	**Misled performative systems** CY, MT, PL

[1] Davies et al. (1989) do not label the two groups but contrast England and other systems based on their legal frameworks.
[2] The EU Compendium identifies 'ideal types' of planning traditions. Each country may exhibit combinations of ideal types in different degrees. The ideal types are dominant in the countries indicated here.
[3] The ESPON 2.3.2 project takes the EU Compendium traditions as a starting point and examines how countries' systems have changed in the last 10 years, in so doing moving between them.
[4] The contribution Berisha et al. (2020) builds the typology it proposed on an analysis of the data collected in the framework of the ESPON COMPASS project (ESPON, 2019).

Source: Authors' own elaboration on the basis of Nadin and Stead, 2008.

Initially, these studies were dominated by a focus on legal and administrative families (Davies et al., 1989; Newman & Thornley, 1996; CEC 1997, Tosics et al. 2010), providing insights into broad similarities and differences between countries. The limitations that arise from this approach are well understood (Nadin & Stead 2008, Janin Rivolin 2012, Reimer *et al.* 2014). In particular, identifying the nature and operation of planning mainly as a product of governmental and legal provisions, these studies classified spatial governance and planning systems according to broad 'families' of law and government, in turn hiding the true variety of countries and regions. Whereas there was evidence that government and legal frameworks are important for the operation of planning, it appeared progressively clear that

"behind the formal façade different kinds of applications may exist in practice" (Larsson, 2006, p. 1).

The increasing request for more sophisticated comparative methodologies inspired the preparation of the EU Compendium of Spatial Planning Systems and Policies (CEC, 1997), the first study in the field to be commissioned by a supranational policy institution. Beside comparing the legal and administrative systems of the countries under scrutiny, the study also addresses six other relevant variables, i.e. (i) the scope of the system in terms of policy topics covered; (ii) the extent of national and regional planning; (iii) the locus of power and competences between central and local government; (iv) the relative roles of public and private sectors; (v) the maturity of the system or how well it is established in government and public life and (vi) the distance between spatial development goals and outcomes. On this basis, the Compendium, define four 'ideal types' of spatial governance and planning in Europe – namely 'regional economic', 'comprehensive integrated', 'land use management', and 'urbanism' (CEC, 1997, pp. 36–37). The Compendium has the merit of approaching spatial governance and planning as an institutional activity[3], an approach that is widely adopted today. Its methodological foundations have inspired a number of comparative researches, of which the most extensive is the ESPON Project 2.3.2 on the *Governance of Territorial and Urban Policies from the European Union to the Local Level* (ESPON, 2007). The project uses the Compendium ideal types in a comparative study involving 29 countries (all EU member states at that time, plus Norway and Switzerland), enlarging its geographical scope and comparing changes over time. In doing so, it adopts a strong 'government lens' using variables on administration type, distribution of competences and decentralization, inter-municipal cooperation. These are cross-tabulated with other variables including the constitutional structure and central-local relationships to provide a complex classification of formal governance arrangements.

In their critical review of comparative spatial governance and planning studies, when referring to the ESPON 2.3.2 project, Nadin & Stead (2008, p.35) argue that spatial governance and planning systems should be rather understood as "embedded in their historical context, the socio-economic, political and cultural patterns that have given rise to particular forms of government and law". Interestingly, this perspective tends to overlap with other studies that had recently tried to unfold the concept of 'planning culture', which looks "embedded in the interdependencies of social, economic and political values, norms, rules and laws" (Hohn & Neuer, 2006, p. 293), and which has been subjected, as such, to more ambitious attempts of comparison (Knieling & Othengrafen, 2009). In this view, both concepts of planning system and planning culture may help explain possible variations over time, as non-linear adjustments to external and internal pressures for change, as well as wider phenomena, such as 'Europeanization' or 'internationalization' of spatial planning (Cotella & Janin Rivolin, 2015; Peel & Frank, 2008; Cotella & Stead, 2011; Stead, 2012; Cotella et al., 2015).

[3] Institutions are here intended as social constructs that are embedded in historical conditions. They are the structures and mechanisms of social order and cooperation from which forms of administration arise and which govern the way planning is practiced (Giddens, 1984; North, 1990; Hall & Taylor, 1996).

The described conceptual and methodological advancement have been reviewed and taken on board by the *Comparative Spatial Planning Research* working group of the German Academy for Spatial Research and Planning (ARL – Akademie für Raumforschung und Landesplanung). In turn, the activities of this group have provided extensive commentary on aspects of comparative planning methodology, and developed a number of key recommendations for future research (Nadin, 2012; Reimer et al., 2014):

- recognizing the dynamic nature of systems as changing and evolving;
- addressing the actual practice of planning which may be very different from the formal system;
- adopting a true multi-scalar approach that does not equate planning in a particular country with a 'national system';

All these elements contributed to shape the conceptual and methodological framework of the most comprehensive and systematic study comparing spatial governance and planning systems in Europe. Launched in 2016, the research project ESPON COMPASS – *Comparative Analysis of Territorial Governance and Spatial Planning Systems in Europe* – conceptualizes spatial governance and planning systems as 'institutional technologies' of government, hence continuously shaped by social conventions, particularly concerning the provision of rights over land. This approach overcomes any separation between the configuration of formal and informal institutions (i.e. the rules and laws); and the culture of planning (i.e. the political and technical discourses and concrete practices and mechanisms which determine ways of planning), in so doing providing a unified analytical approach for the comparison of territorial governance and spatial planning. This approach goes beyond previous studies by dynamically exploring the complex interplay among four main dimensions that compose each system, i.e. the structure, tools, discourse and practices (Janin Rivolin, 2012). In brief, the evolution of spatial governance and planning is triggered by the variety implicit in the complex processes of trial and error that characterize the realm of *practices* concerning the use of land (Moroni, 2010). This variety is then reduced via a process of selection, occurring through a competitive and iterative *discourse* of technical and political nature, leading to the emergence of certain 'hegemonic concepts and solutions' (Adams et al., 2011). Codifying those that remain makes for a durable system of rules, thus modifying the existing *structure* – the set of constitutional and legal provisions for territorial governance. This leads to a systematic and widespread application of newly established *tools* – not only spatial plans and programmes, but also control devices, monitoring and evaluation procedures, forms of economic incentives etc. – as the drivers of (new) practices.

The ESPON Compass research team did not produce any typological classification of the countries on the basis of the collected evidence, arguing that the depth of analysis reveals that, even when similarities emerge among countries, the overall landscape for spatial governance and planning in Europe is characterized by an elevated level of fragmentation. However, the project produced as many as 32 thick descriptions of how the institutional and operational configuration of spatial governance and planning have evolved in all European countries, exploring

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elements and variables that haven't been touched upon before[4]. Building on this results, and on a branch of the comparative planning studies literature focusing more in detail on the capacity of the public authority to control spatial development (Janin Rivolin 2008, Munoz-Gielen & Tasan-Kok, 2010), Berisha et al. (2020) produced the most recent typological classification of spatial governance and planning systems in Europe, that compares how the rights to use and transform the physical space are specifically allocated in 39 European (EU and non-EU) countries, as well as whether the state or the market prevails in guiding the development decisions.

3 Historical institutionalism and decolonial perspective in spatial planning studies

The conceptual and methodological evolution that had characterized comparative territorial governance and spatial planning research in the last thirty years or so is certainly praiseworthy. However, the fact that the latter has been founded on the incremental development and evaluation of research activities focusing on the European continent raises some concerns in relation to the actual potentials for its applicability in other context, that are characterized by different conditions. More in particular, the described comparative activities have been progressively tailored on the object of study, i.e. highly institutionalized spatial governance and planning systems. As a consequence, they all start from the assumption that spatial governance and planning are dynamic institutional technologies that evolve as a result of a cross-contamination between domestic (through path-dependency logics) and international factors (global challenges, international cooperation, Europeanization etc.), as a consequence of fractures into path-dependency, caused by external stimuli which influence national and local governments' practices (Cotella & Janin Rivolin, 2015).

However, as addressed by the very essence of the concept of path-dependency as it is understood within the realm of historical institutionalism, institutions should be understood as "shared norms and formal rules" and they are established when critical junctures take place, i.e. "moments of major change" (Sorensen, 2015, p. 18). In order to successfully analyze spatial governance and planning systems, it is thus important to understand which are those moments. In this light, when it comes to the Latin American context, it is crucial to acknowledge the path-dependent role played by the legacy of institutional frameworks developed under the colonial period, that still bears important consequences on current spatial planning approaches and agendas (Sorensen, 2015). For instance, the existing spatial planning regulations (e.g. the Colombian and the Ecuadorian ones), even if developed in recent years, recall very closely the 'conformative' nature of the Spanish regulative framework, establishing rigid land use rights on the basis of the private property of land, in so doing proving misfit in dealing with the informal development processes that accounts for a very high share of the occurring transformations. In this light, the colonial legacy is still visible in the existing divide between the formal city and the informal settlements, reproducing the fracture built in the past between the colonial 'planned' city and the 'spontaneous'

[4] For a full evidence of the results of the ESPON COMPASS project see the materials available at: https://www.espon.eu/planning-systems (ESPON, 2019 and related annexes).

indigenous settlements. It was the Laws of the Indies introduced by the Spanish colony that "marked the initiation of socio-spatial inequality in Latin America" (Galland & Elinbaum, 2018a, p.21) and the consequences of those model are currently an enormous challenge for spatial planning.

As suggested by Sorensen, comparative spatial planning research could achieve interesting results when adopting the historical institutionalism perspective, and the study of planning history is pivotal for understanding the evolution of spatial governance and planning systems over the time and, thus, for their comparative analysis. In this light, concepts and methodologies developed within comparative spatial planning studies on the European continents should be 'tested', and not simply applied (Watson, 2016), in the Latin America context, by adopting the historical institutionalist approach. In doing so, additional tweaking may be needed, in particular to adopt a broader understanding of institutions that includes informal settings alongside formal ones. To this end the 'dependence theory' developed by Quijano proves particularly useful (Quijano, 2000, 2014). More in detail, Quijano argues that urbanization in Latin America is linked to the Latin American dependence, which does not ground only on external factors, but it has to be analyzed as a system of interdependence (Quijano, 2014). Recognizing the historical dependence of Latin American countries allows to explain power relations embedded in spatial planning systems, and this could be a useful addition to shed light on a number of black boxes that remain unexplored in the analysis of the relations between the four dimensions of structure, tools, practices and discourse that characterize the most recent comparative studies developed in Europe (Janin Rivolin, 2012, ESPON, 2019).

Planning history acquires here a crucial role to read the changes in spatial development (both at the national, regional and local levels) and to undertake a comparative analysis of spatial governance and planning. The existing differences classified in the four dimensions of spatial planning systems could open to fertile contributions if applied to the Latin American context. For instance, there is an evident, constant mismatch between, on the one hand, the discourse on governance and spatial planning, carried out by both politicians and planners who endorse value-based concepts as the 'right to the city' and the 'right for housing' and, on the other hand, the tools that are actually implemented and the formal practices that they generate, which do not observe (and even violate) those constitutional rights. At the same time, informal settlements could be read as a spontaneous implementation of the right to the city and the right for housing, however developing completely outside of, and in full discrepancy with the existing spatial plans and regulations. In this light, also the mentioned, recent classification of spatial governance and planning systems in Europe on the basis of the system used for allocating land development rights, could lead to interesting contributions if applied to the Latin American context, if complemented by a more thorough investigation of the unwritten rules which lay under informal developments and the public-private negotiations which guide 'formal' developments on a case-by-case basis.

Acknowledging the above, in order to test existing comparative conceptual and methodological framework to spatial governance and planning in the Latin America context, the 'coloniality of power' (Quijano, 2000) should be acquired as a

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pivotal assumption, in so doing allowing to 'go beyond technical efficiency' and to consider dominant power relations hidden by the apparent neutrality of spatial planning systems (Servillo & van den Broeck, 2012). Hence, spatial planning studies in Latin America should focus on eviscerating the networks of power relations and dynamics, involving both domestic and international factors, which have progressively shaped the evolution and consolidation of spatial governance and planning systems as well as the territorial development dynamic that continue to occur beyond them. To do so, also crucial is to sort out current latent colonial legacy which still persists in national and international actions. Actually, the influence of international organizations and 'global philanthropy' (Montero, 2018) on spatial planning systems in Latin America is a rather unexplored field, and the impact on national development agendas and their socio-spatial implications (Galland & Elinbaum, 2018b) need further investigation.

Finally, also expanding spatial governance and planning studies by adopting a decolonial perspective and reversing the role of the periphery and the metropole could constitute a promising perspective. Historically, the role of the periphery has been supplying data which has been processed in the metropole, where theory has been produced (Connell, 2014). The decolonization of spatial planning studies means to revert this power relation and to open to the variety of 'conflicting rationalities' (Watson, 2003). Connell pinpoints four possible intellectual projects adopted by scholars for 'decolonizing social thought in theory, research and application': the first one is the "defense and preservation of indigenous knowledge and practices", the second one is "thinking the invasion", the third one is constructing knowledge "from the periphery" and the last one is the reconstruction of knowledge (Connell, 2014, p. 214-215). To acknowledge these issues, comparative spatial planning studies should reconstruct knowledge from the periphery, which means to contaminate the existing conceptual and methodological frameworks with new 'narratives' from the Global South. As suggested by Connell (Connell, 2018, p. 5), decolonizing concerns re-shaping the discipline "in the global North as much as the global South". This could be done in the North by "learning in new ways, and in new relationships" (Connell, 2014, p. 219), i.e. by adopting different perspectives and prioritizing the neglected and counterhegemonic forces, for a wider understanding of spatial planning systems.

4 Institutionalizing informal practices

An additional, important issue that needs to be taken into account when approaching Latin American spatial governance and planning systems through the European comparative spatial planning lens is that a high share of the actual spatial transformation occurs outside the practices actually promoted, managed or regulated by these systems. Informality in Latin American countries is not a recent phenomenon, it is possible to identify spontaneous developments alongside official regulations since the colonial period (Abramo, 2012). Based on the latest United Nations report on the state of the Latin American and Caribbean cities (United Nations, 2012), informality is highly heterogeneous, ranging from a 5% in Suriname to a 70% in Haiti. The widespread situation is that informal settlements are actually 'invisible' in spatial plans and they are considered illegal and ruled out by spatial

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regulations. In many Latin American local governments, spatial planning is current done *ex-post*, which means that local governments are not able to anticipate spatial development. Spatial plans follow inevitably the growth of informal settlements, resulting in an increase of the cost of basic services and infrastructures. The conception of private property, as the essential requirement to allow the 'triumph of capitalism' and to tackle poverty and urban informality in the region (De Soto, 2001), has overflowed in many Latin American countries, banishing alternative forms of property. Actually, many local governments in the region are expanding their urban boundaries in order to allow poor people to access mortgages and credits, and to be part of the land market as asked by the capitalistic framework. Private property seems to be the panacea to solve urban informality but, in fact, it perpetrates the existing inequalities and it does not tackle the challenge of reaching the security of tenure for all.

Simultaneously, spatial plans (both at the national and at the local level) relegate indigenous lands to a 'semi-illegal' order and they are actually unable to conjugate different forms and visions of a same territory. The common and the collective property rights are indeed excluded from current spatial planning regulations, and this occurs even if constitutional frameworks (as for instance in Colombia, Brazil and Ecuador) acknowledge common and collective property rights alongside the private ones. This clearly points out an evident mismatch between constitutional rights and paradigms (as the mentioned right to the city, or the 'good living' of the Andean area) and current spatial planning legislations, which exclude the majority of 'alternative' forms of developments from their legal framework.

In a framework where spontaneous and informal settlements accounts for the majority of spatial developments, practices – and especially those occurring outside the formal system and in the absence of any form of regulation or even acknowledgment – are certainly more relevant than in the European context, where spatial development is predominantly congruent with spatial planning structures and tools[5]. In order to test the comparative analysis of spatial governance and planning in Latin America, it is indeed necessary to reconsider the understanding of institutions, by expanding it to informal ones. A broader conception of spatial planning needs to include informal developments alongside formal ones, as a simultaneous (and predominant) engine of spatial development that spatial governance and planning activities should not deny, but acknowledge and start to problematize. This argument does not include any value judgement of the effectiveness of informal developments; it mainly acknowledges the pivotal importance to recognize that they exist as a consequence of an inequal income distribution, inadequate social housing production, highly profitable informal market with positive community and constructive externalities (Abramo, 2012). The informal land market has its own institutional framework and the trust among people is the backbone for any kind of relationship. Trust relationships need a 'local

[5] This is not to say that the European continent are exempt from development activities occurring outside the rule. Illegal development on the slopes of Mountains and on the seashores has for long time characterized the Italian Mezzogiorno, Greece and other Southern European countries, and are still rather common in the Western Balkan Region. However, they are of episodic nature if compared with how this phenomenon deploys in the majority of Latin American countries.

authority' (religious, cultural or politic) who mediates conflicts and guarantees transactions (Abramo, 2012). As these authorities are frequently more powerful than formal local authorities, they need to be taken into account when analyzing and comparing spatial governance and planning in Latin America, in order to be able to provide meaningful recommendations towards their progressive recognition and understanding.

To undertake a comparative analysis of spatial planning systems in Latin America it is thus crucial to map out both formal and informal relationships and tracing legal and illegal institutions who lead the spatial development. Considering the high percentage of informal spatial development, Latin American spatial planning studies should focus more on the practices, in order to acknowledge the heterogeneity of existing spatial solutions and, in turn, to then be able to tweak existing spatial planning tools to the real needs of communities. Overall, the acknowledgment of many practices, often considered as illegal, could represent the way towards a broader concept of spatial planning system. Simultaneously, it could lead to the institutionalization of practices and to the setting-up of new and original tools for spatial planning, which could guarantee the implementation of different models of property rights. This is indeed an interesting input for the European comparative spatial planning studies because it opens to a variety of 'conflicting rationalities' (Watson, 2003) which are often excluded from the Northern spatial planning debate.

5 International influences and the need for a Latin American regional planning agenda

The above clearly suggests how the heterogeneity of spatial governance and planning systems and the variety of existing practices (both formal and informal) that characterize the Latin American context is certainly an interesting field for spatial planning studies. The growing academic interest and the 'Southern turn in planning' (Galland & Elinbaum, 2018a) is certainly an indicator of the shifting approach to planning theory and practice, and calls for the development of a shared research agenda. The research agenda is the requirement *sine-qua-non* for reaching a regional commitment for spatial planning, and the comparative analysis of spatial governance and planning is crucial to attain it. To implementat the 2030 Agenda (United Nations, 2015) means to territorialize the Sustainable Development Goals (SDGs), and this necessarily requires an effort of coordination at regional level. In this light, the adoption of global Agendas and the achievement of shared international goals could foster a progressive 'internationalization' of spatial planning. However, it is pivotal to avoid that the chase for global goals (which actually pave the way for funds and credits) does not remain limited to the formal façade of national and local governments' urban policies and planning strategies (mainly at the discourse level), to the detriment of place-based actions aiming at solving socio-spatial inequalities. The comparative analysis of spatial planning systems in Latin America should address this crucial issue and the analysis of international influences is thus a field that is worth investigating.

A regional development and planning agenda for spatial planning in Latin America is needed for several reasons, e.g. the sustainable development of the

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Amazonia, the management of the hydrographic basins or the cross-border management of conflicting areas. The exploration and the comparison of spatial planning systems could allow policymakers and national governments to easily adopt shared initiatives for spatial development, even more in these troubling times of health crisis, where a global strategy is needed, and spatial inequalities should be regionally and globally addressed. At the same time, a joint regional agenda could contribute improving the effectiveness of the action of grass-root organizations and social movements in facing shared challenges based on the claim for human rights.

Also international organizations and cooperation aids could improve their actions and programs by adopting a regional understanding of spatial governance and planning and reconsidering their support in sharing and transferring *tout court* best urban practices as a 'quick fix' enforceable to every context. This is particular important in order to avoid the 'urban solutionism' (Montero, 2018) promoted by many international organizations and to promote a regional management of spatial planning. Furthermore, the comparative analysis of spatial governance and planning could foster the collaboration among international organizations, governments and universities, for the development of a collaborative culture of planning in the whole region.

6 Concluding remarks and future research perspectives

The existing academic literature on the comparative analysis of spatial governance and planning in Europe without doubts provides a number of interesting elements and inputs to draw from, in order to approach the Latin American context. However, when doing so, it is crucial to acknowledge the limitations that a conceptual and methodological framework developed in the Northern Hemisphere presents, when applied uncritically to the Global South. In this sense, the proposed contribution argues for 'testing' and not simply applying the comparative spatial planning studies in the Latin American context, in so doing contributing to further tweak these studies by expanding the concept of institutions and practices, inquiring hidden power relations, and assuming the 'coloniality of power' as a starting point for approaching the research. In doing so, the comparative analysis of spatial planning systems could give awareness and shed light on those neglected practices and 'indigenous modernities' (Robins, 2003; Watson, 2003) which represent the counterhegemonic forces that shape spatial planning systems in Latin America.

Moreover, the presented information argues in favor of a further focus on the dimension of the practices and, in particular, of a consideration those informal practices that accounts for the majority of spatial developments in Latin America. Original and unexplored spatial planning solutions could open to a fertile debate even in the North, where spatial planning systems are conceived mostly as pivoted around and occurring through formal institutions (Mazza, 1996; Galland & Elinbaum, 2018b). The empirical and theoretical research developed from the Global South could shift the debate towards the concept of spatial planning as "social and historical constructions defined by cognitive, social and discursive dimensions" (Servillo & van den Broeck, 2012; Elinbaum & Galland, 2018b). More importantly, as spatial planning regulations are 'fast-moving institutions' (Roland, 2004; André

Sorensen, 2010) that are able to influence 'slow-moving institutions' as the land property rights system and the 'land culture', to focus spatial planning studies on informal practices, based on the claim for the right to the city and the right for housing, could influence existing spatial planning tools and regulations and, in the long run, this could lead to the acknowledgement of neglected property rights. Finally, particular attention should be steered towards the role of international frameworks and international organizations, which do not have any legal capacity to bind national and local spatial planning decisions in Latin America, but actually play a crucial role and have a strong effect on governments' decisions. In this sense, the analogy with the influence of the European integrated policies on spatial planning systems in Europe is evident and need further investigation, even more in a global context shaped by the adoption of the 2030 Agenda and its SDGs. The 'internationalization of planning' is without a doubt an interesting field of research in Latin America which is worth investigating, and the result of this investigation could contribute to the development of a Latin American regional development and planning agenda, as a shared platform through which to further contextualize the international influences on the basis of real local preconditions and needs.

To sum up, additional efforts are needed to testing comparative spatial governance and planning studies in the Latin American context, in so doing "feed[ing] back to the growing and diverse international 'pot' of planning theories and concepts" (Watson, 2016, p.39), as well as providing useful inputs and recommendations for the development of the field of practices therein.

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