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Collaborative planning? Not yet seen in Poland. Identifying procedural gaps in the planning system 2003–2023

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Abstract. Collaborative planning aims to increase the legitimacy of decision-making in spatial development. In this approach, planning involves debate and engagement in discourse, and participation and interaction between actors are thus at the heart of the planning process. This article examines whether the planning system in Poland as defined for the period 2003–2025 provides a level of participation and deliberation and other qualities that together allow it to be classified as a collaborative model. The legal procedures in the most commonly used planning instruments are therefore analysed in detail to determine whether they provide honest, open, equal and transparent access to the decision-making process to all stakeholders. The analysis reveals numerous deficiencies in the planning procedures that undermine the collaborative nature of spatial planning in Poland. The study summarises the experience of twenty years of spatial planning practice in Poland and provides a useful starting point for assessing the new planning system that has gradually been being implemented since 2023.

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1. Introduction

The collaborative turn has dominated planning theory since the 1980s (Allmendinger & Tewdwr-Jones, 2002) and insists on more fair, transparent and accountable decision-making. In this view, participation is essential in decision-making, and planning is defined as "a democratic enterprise aimed at promoting social justice and environmental sustainability" (Healey, 1997: 233). In this perspective, the nature of planning is, through its impact on the decision-making process, inherently political (Dorcey, 1986). Lane (2005) identifies several converging ideas that underpin the communicative perspective: communicative rationality (Habermas, 1984, 1987), discursive democracy (Dryzek, 1990) and dialogic democracy (Giddens, 1994). Healey (1992) emphasises that the reasoning underlying the organisation of society has to be formed within inter-subjective communication. Thus, this paradigm recognises the diversity of actors and the motivations behind them who, in an interactive process based on reasoning and consensus building (Innes, 1996), agree on how to use or transform a particular place. The key to this approach is not only participation, but also debate and interaction among different actors, leading to joint decision-making.

Collaborative planning is "part of the toolbox of a contemporary planning praxis" (Wolf et al., 2021). Yet its influence on final decisions varies depending on how it is operationalised. Let us define spatial planning as "the ensemble of institutions that are used to mediate competition over the use of land and property, to allocate rights of development, to regulate change and to promote preferred spatial and urban form" (ESPON, 2018: 8). Therefore, the participants in this negotiation should have a tangible, real influence on the outcome. Collaborative planning should evolve into an institutionalised practice (Monno & Khakee, 2012) reflected in, among other things, a legally defined planning system.

The question addressed in this paper is whether the planning procedures in force in Poland during the period 2003–2023 ensured that stakeholders, and in particular local residents, were able to engage in an "interactive and interpretative process undertaken among diverse and fluid discourse communities" (Healey, 1992: 144) leading to a widely accepted consensus. In other words, we would like to elaborate on whether the planning system in Poland has provided access to real decision-making and thus to citizen control (Arnstein, 1969) and what tools and mechanisms it has used to do so.

Our study was originally based on the existing planning system, but during the publication process, major changes to the planning system were enacted. In the context of this paper it is very telling that, on 23 March 2023, the government sent the draft legislation to Parliament and already on 24 July 2023, having gone through the entire legislative process in Parliament, the President signed it. The changes will come into force gradually over the next three years. Thus, our study provides an overview of the twenty years of the planning system in Poland and its relevance to the collaborative model. As a comprehensive analysis, it may contribute to understanding whether the new planning system is moving closer to the model of collaborative planning. The evaluation of this operationalisation in the new system can be significantly facilitated by identifying the deficiencies of the current planning system in operationalising the collaborative planning model.

Although we are aware of the shortcomings and limitations that challenge the theory and practice of collaborative planning, which are widely discussed in the literature (e.g., Rydin & Pennington, 2000; Allmendinger & Tewdwr-Jones, 2002; Miessen, 2011; Goodspeed, 2016), we do not elaborate on them in this paper.

This paper analyses planning procedures from a planning perspective. It does not address legal issues as such; nor does it discuss the need for public participation in the formulation of spatial policy in Poland (for these, see e.g., Domańska, 2014; Harat & Twardoch, 2015; Rembarz & Martyniuk-Pęczek, 2016; Szlachetko, 2016; Daniel, 2019; Pistelok & Martela, 2019; Ostrowska, 2020; Broniszewski et al. 2022). Instead, it examines whether and how the procedures for drafting planning documents enable collaborative planning to be achieved in practice. Many of these will generally remain in the planning system even after the changes introduced in 2023.

The following section of the article presents the methodological approach to the study. The results of the analysis of when and how different actors are involved in the processes of drafting planning documents as defined in the planning system and the identification of the main gaps that hinder the implementation of the principles of collaborative planning complete the subsequent section. The discussion that follows focuses on the relevance of the findings to the collaborative approach and the implications for the effectiveness of planning itself. The conclusions summarise the findings.

2. Approach and methodology of analysis

Despite a continuing debate about the nature of the approach, its relationship with power and institutions, the tools needed to operationalise it, and, last but not least, the risks, collaborative planning has a solid foundation on which to build. The most important feature of planning from a collaborative perspective is "to communicate, argue, debate and engage in discourse" (Lane, 2005: 296) and therefore, it requires ***a forum for dialogue*** (Hillier, 1993; Healey, 1997). The ***transformative power of dialogue*** changes all the actors participating in the planning process, including the institutionalised ones who have to accept the views of others as legitimate (Innes & Booher, 2004). Planning should, therefore, be recognised as a political process concerned with decision-making (Faludi, 1987). In a democratic society, this requires ensuring ***equal access to the process*** by broadening the range of stakeholders and making procedures ***open and transparent*** (Healey, 1992). ***Collective decision-making*** can take different forms, such as deliberation, voting or bargaining, which can be used at various stages of the planning process and depending on the actors involved (Allmendinger & Tewdwr-Jones, 2002).

Against this background, an analysis of the Polish planning system was carried out from the perspective of its compliance with the collaborative approach. It consisted of an in-depth analysis of the planning procedures as defined in the legal acts setting the framework for the planning system in Poland. These include, in particular, the *Planning Act* (2003) and the regulations issued thereunder, the *Municipal* (1990) and *Provincial* (1998) *Government Acts*, the *Heritage Protection Act* (2003), the *Environmental Protection Act* (2001) and *Nature Protection Act* (2004) the *Development Policy Act* (2006), the *Revitalisation Act* (2015) and the *Administrative Procedure Code* (1960).

The spatial planning system in Poland has been the subject of several analyses and evaluations (for these, see e.g., Izdebski & Zachariasz, 2013; Kowalewski et al., 2014; Kowalewski, Markowski, Śleszyński, 2018; Nowak, 2021; Szlenk-Dziubek & Wisłocka, 2021; Mironowicz, 2022; Nowak, Śleszyński, Legutko-Kobus, 2022), which are beyond the scope of this paper, but which of course also deal with procedural issues, though not from a collaborative planning perspective.

The study involved the analysis of the following materials: (1) planning documentation evidencing the process of drafting 22 planning documents/ instruments, including two Regional Territorial Development Plans, two Landscape Audits (at the final stages of procedures), five Studies of Spatial Development Conditions and Directions, two Landscape Resolutions and eleven Local Plans (2) experience of the authors' own planning practice, covering more than 20 different planning documents/ instruments and experience in facilitating informal practices (Mironowicz & Ciesielski, 2023), both analysed using the reflective practice method (Willson, 2021; Martyniuk-Pęczek & Pęczek, 2024), and (3) analysis of 20 in-depth structured individual interviews (IDI) with planners and decision-makers.

The territorial scope of the analysis covered three size classes of urban settlements – namely large cities (e.g., Warsaw, Gdańsk, Wrocław, Cracow) and medium and small towns (e.g., Zielona Góra, Gliwice, Wałbrzych, Sopot, Kłodzko, Przemków) – as well as rural settlements (e.g., Białka Tatrzańska, Lutogniew). At the regional level, it covered the voivodships of Pomorskie, Kujawsko-Pomorskie, Wielkopolskie and Dolnośląskie.

The IDIs were concerned with the use of informal practices in planning, but part of them also involved identifying the motivations for undertaking such activities. Here, respondents referred to the legally established planning process by indicating what they considered to be the most important sources of reliance on informal practices. The aim was to describe and analyse how the interaction between the actors in the planning process takes place in practice and how it fulfils the criteria of collaborative planning listed above. IDIs were conducted with nine decision-makers representing large, medium and small cities (three from each category) and eleven practising urban planners with experience of five large, four medium and five small cities (a large proportion of the interviewees had experience from settlements of different sizes, hence the result exceeds the number of respondents in this group). The interviews were conducted in the early months of 2021, during the COVID-19 pandemic, and were therefore mostly conducted remotely, using both audio and video. The recordings were used to fill in individual questionnaires, which were generalised by numerical coding and aggregated. This made it possible to compare responses. In this paper we do not carry out an in-depth analysis of the IDIs themselves (for this, see Ciesielski, 2023), as they deal with a slightly different issue to the one addressed here, but we refer to the results of the interviews where they are relevant to our research on operationalising the collaborative planning model.

3. Results

3.1. Participation procedures in the planning system

The government structure of Poland consists of four levels, yet only two have competencies in planning: the regional and the local. The planning instruments for each level and the planning competencies (all as defined until the major amendment of the *Planning Act* in July 2023), were as follows:

1. at the regional level:
   a. Regional Territorial Development Plan (Regional Plan)
   b. Landscape Audit (LA),

both formulated by the Marshal (chairing the board of the regional self-government executive body) and adopted by the regional council;

2. at the local level:
   c. Study of Spatial Development Conditions and Directions (hereinafter: "Study"), which is an unusual (from a European planning systems perspective) name for the spatial development (general) plan prepared for the entire territory of the city or commune,
   d. Local Spatial Management Plans, or Local Plans for short, (LPs),

both formulated by the mayor and adopted respectively by the city or commune council.

Two other instruments can be used in specific, legally defined situations. Firstly, local authorities are empowered to draw up a Local Revitalisation Plan (LRP), a specific form of LP with the power to introduce more regulations than the "standard" LP. Secondly, local authorities are empowered to regulate conditions for street furniture, outdoor advertising and media, and fences throughout the city or municipality. This is commonly known as a Landscape Resolution (LR).

If there is no local plan for the area in question, it is still possible to develop the land if the conditions set out in the decision on the conditions for building (DCB) issued by the mayor are met. This instrument was intended to facilitate the development of small plots within relatively homogeneous and built-up areas (such as single-family neighbourhoods) but is, in fact, heavily overused by municipalities for all types of development (NIK, 2017).

All instruments, except the Study, will remain in the modified system.

The procedures have been established for the preparation of each planning document. The *Planning Act* (2003) defined it for the Study in Article 11, for the LP in Article 17, for the LR in Article 37b, for the LRP in Articles 37h-37n, for the DCB in Articles 51, 53, 54, 64, for the LA in Article 38b, and for the Regional Plan in Article 41. Preconditions for the LRP were also defined in chapters 3 and 4 of the *Revitalisation Act* (2015).

Within this system, two categories of stakeholders and two "entry points" can be identified. Stakeholders fall into the ***general public*** group (citizens, businesses, organisations, etc.) and the ***institutionalised*** group addressed explicitly in the planning law. Typically, these are public agencies or institutions responsible for sectoral policies (e.g., water management, protection of the natural environment or cultural heritage), public authorities representing different levels of territorial governance, and professional bodies that advise the authorities on spatial issues (so-called architectural and urban planning commissions). Stakeholders can participate in the planning process in the ***initial phase***, where proposals can be submitted for further consideration, and in the ***consultation phase***, where the documents or plans are discussed, evaluated and, where appropriate, approved (Karadimitriou & Mironowicz, 2012; Ciesielski, 2020; Iżewska 2022). There are other typologies of actors in planning (see e.g., Kafka, 2020), but here we limit the distinction between stakeholders to the level of decision-making in the planning process.

The LA involves both institutional partners and the general public. In the initial phase, stakeholders are only informed that the process of LA drafting is beginning. The consultation phase is different for two categories of stakeholders. The institutional stakeholders listed in the *Planning Act* are asked for their formal opinion on the draft version of the LA. Their comments may be incorporated into the final draft, which must be made available to the public for at least one month. At this point, the consultation phase opens to the general public. Anyone can submit a comment on the draft. The regional council is obliged to accept the list of comments not taken into account by the marshal if it is to approve the LA.

A similar procedure applies at the local level for the LR, with minor differences in terms of the "empowered" group of institutional stakeholders, their competence to influence the final version of the document, and the timeframe.

As we can see, the involvement of stakeholders in the initial phase is limited to the provision of information. Most stakeholders can only comment on the final draft of the document. There is no interaction between stakeholders.

Within the formal structure of drafting the Regional Plan, the Study and the LP, both types of stakeholders are involved in each phase, although in different ways. Their power to influence the plans also varies. In the initial phase, the institutional stakeholders listed in the *Planning Act* are informed in writing about the beginning of the planning procedure. They are formally invited to submit proposals, while the general public can only learn about this fact through public announcements (in the media, on official municipal websites, etc.). Everyone is entitled to submit proposals.

The consultation phase is more complex and is carried out in two stages. The stakeholders entitled under the *Planning Act* formulate their opinion on or approval of the first draft. The statuses of the opinion and of the approval differ from one another widely. Whether positive or negative, the opinion entitles the planning authority to continue with the procedure. It can be considered as "advice". Lack of approval, by contrast, halts the procedure. In this way, the institutions entitled to approve the draft version have a powerful tool for influencing the plan within their sphere of competence, as their demands or suggestions cannot be ignored. An example of this type of "powerful" stakeholder is the Heritage Conservation Office. Within this first step, the changes, especially those requested by the consulted parties, can or sometimes must be implemented in the draft plan. Interestingly, this process is not entirely transparent; the other stakeholders do not know which decisions have been taken at the request of the institutional stakeholders.

The second step of the consultation phase is aimed at the general public. At this stage, the document must be made available to the public. The drafting authority must organise a public presentation of and discussion on the draft. Anyone can comment on the decisions. Minor corrections to the draft are still possible. Major modifications would reverse the procedure to the first stage of consultation. Similarly to the procedure already known from the LA and LR, the list of comments on the draft that have not been taken into account must be accepted by the respective council together with the approval of the document.

In the initial phase, everyone has the opportunity to make individual proposals for the plan. During the consultation phase, the privileged group of stakeholders has powerful instruments to influence the project "in the making". The general public can only expect minor corrections to the virtually final draft. Only in the final stage is there an interaction between a limited number of stakeholders (public discussion).

The most complex stakeholder engagement process characterises the LRP. Collective decision-making is the essence of the procedure. It involves all kinds of actors, not only in the planning phase but also in the diagnostic phase, which is usually left to the experts. The *Revitalisation Act* defines a variety of formats for this involvement: written and oral comments, meetings, study tours, workshops, debates, questionnaires and interviews. However, local authorities rarely use this instrument because of its time-consuming and complex procedures. At present, only one such plan has been adopted in Poland (in Kalisz), and several are at various stages of preparation (Borsa, 2021). We will therefore exclude this instrument from our further analysis as there needs to be more evidence of its practical implementation.

For a DCB, there is a very limited participation scheme, which only involves the approval of selected institutional stakeholders. There is no requirement to provide information to the local community. For this reason, it is not included in this study.

3.2. Procedural gaps in the planning system

Ensuring stakeholder diversity is a crucial aspect of collaborative planning. It is, therefore, necessary to look at the ***type of actors involved in planning***. A privileged group is defined in the planning procedures, representing expert knowledge or administrative power. Their participation cannot be avoided (Kobielska, 2015; Szlenk-Dziubek & Wisłocka, 2021). The others can fall into institutions, commercial businesses, NGOs, formal and informal groups and individuals. This division, enforced by the planning procedure, is a source of ***unequal representation***. Stakeholders' levels of organisation, access to information, expertise and those who control the planning process, their resources, knowledge and skills, including the ability to speak in public, vary considerably. These factors are critical in determining how the debate unfolds and concludes (Rembarz & Martyniuk-Pęczek, 2016). The participation procedures do not provide for a learning process that might ultimately prevent the exclusion of certain underprivileged actors from the debate (Ostrowska, 2020). ***This implies a considerable inequality in decision-making*** (Daniel, 2019).

The territorial scope of a document is also likely to have certain implications for the type of actors involved in the planning process (Brownill & Parker, 2010; Douay, 2010). For example, regional issues may seem more "abstract" to most "ordinary

people". However, it turns out that individuals with expert knowledge or informal groups (e.g., "green" activists) participate in a process normally dominated by institutionalised actors (Medeksza & Mironowicz, 2015; Mikołajczyk & Leśniewska-Napierała, 2022).

There is also a significant problem of ***unclear roles***, especially the role of the planner, who does not act as an independent actor (Kafka, 2020; Ciesielski, 2023). By law, documents are prepared by the mayor or the marshal, so the decisions of the authorities are binding on the planner, who prepares the documents according to their professional knowledge. It is also unclear what role the planner should play in relation to other stakeholders (Lane, 2005). The IDIs have also shown that neither the planners nor the decision-makers feel that they are responsible for the planning procedure.

Debate and informality are at the heart of the collaborative approach. Yet, ***formal and non-interactive methods*** predominate in how stakeholders communicate in the planning process (Kobielska, 2015). For example, each applicant submits their own proposal based only on their own vision of how the area could be developed without the opportunity to confront this vision with the ideas of others. In both the initial and consultation phases, formality impedes dialogue. In addition, many stages of the process involve the exchange of formal written communications rather than face-to-face contact. Access to meetings where discussion is possible is limited, if it exists at all. The public debate takes place after the substantive decision and agreements with institutional stakeholders have been reached, limiting the role of "ordinary stakeholders" to reacting to the proposals.

The forms of collective decision-making are not specified. Instead, decisions of an imperative nature, such as approvals, which determine subsequent steps in the procedure, are clearly indicated. There is no regulation at all on how to deal with opinions, be they the formal opinions of various bodies required by the procedure, views expressed in the context of public debate, or comments on a draft document.

The ***administrative routines in decision-making*** form a significant constraint on collaboration within the planning system (Nowak, 2017). The drafting of a document requires that the institutional stakeholders itemised in the law be consulted before the general public. This consumes a considerable amount of time and effort. When this phase is finally concluded, the planners tend not to change much because, otherwise, this phase has to be repeated. Therefore, there is a predilection for rejecting suggestions from the consultation with the general public that would significantly change the draft document, even if they would improve it. The IDIs showed that such an approach is particularly common in municipalities that do not have their own planning units and where the documents are prepared by an external contractor who is responsible for, among other things, the efficiency (speed) of the procedures.

The ***lack of transparency and information***, too, hampers the engagement of the actors (Dobosz-Mucha et al., 2019). Firstly, the proposals for the plan are not publicly known, and there is therefore no information given about the complexity and particularities of the demands. Secondly, the results of the consultations with the institutional stakeholders are unavailable to others (except when requesting access to public information), so the actors are unaware of the solutions imposed by different institutions. Finally, the comments taken into account in the consultation phase are also not declared. The IDIs showed that, according to all the participants, the lack of knowledge about effective participation and thus access to information means that the activity of the local community only increases at the stage of the planning provisions being implemented in the real space, when no actions can lead to changes in the adopted planning instruments.

Even basic information about the planning process, such as the start of the preparation of the planning document, may be overlooked by stakeholders (Szlenk-Dziubek & Wisłocka, 2021). The *Planning Act* defines how the local community shall be informed about the beginning of the procedure and the public presentation of the plan, and this includes information on the municipal website. In practice, however, nobody constantly follows the news on this website, and thus it is not very difficult to miss this information. It is interesting to note that the interviewees pointed out that in small towns they felt that access to information was provided by the informal, locally accepted circulation of news. However, they did not explore this in any way and took it for granted. ***Procedures do not facilitate access to information***. As a result, many stakeholders are not encouraged to participate.

We are, of course, aware of informal practices (Ciesielski, 2020, 2023; Mironowicz & Ciesielski, 2023) that have the attributes of collaborative planning and respond to deficiencies in the planning system, but we do not address them here precisely because they are not part of the system.

4. Discussion

Innes and Booher (2004) advise against oversimplifying the problem of participation and reducing it to a relationship between "society" and "government". They advocate for "a multi-way interaction in which citizens and other players work and talk in formal and informal ways to influence action in the public arena before it is virtually a foregone conclusion" (Innes & Booher, 2004: 429). In Polish planning procedures, as we have shown, communication is predominantly unilateral between separate pairs of stakeholders, one of which is the planner representing an authority formally drafting a document. The public discussion, if it takes place at all, is also to some extent of this nature, as only the planner (in the role as mentioned earlier) and "society and its organisation" convene, while the other stakeholders who participated in the process at earlier stages do not attend. This, therefore, mirrors an almost ideal case of the reduction in participation referred to by Innes and Booher (2004). This communication structure does not create any forum of dialogue; it also prevents two other conditions essential to a collaborative approach: mutual learning and collective decision-making (Dobosz-Mucha et al., 2019; Szlenk-Dziubek & Wisłocka, 2021).

Capacity building for regular stakeholders is a prerequisite to collaborative practices (Coppens, 2014), especially on the level of group capacities. Yet, in planning procedures, the actors are left alone. They often do not fully understand the purpose and nature of the process in which they are involved. Nor do they know what tools are available to them. This applies not only to the "ordinary citizen" but also to institutional actors who are not experts in planning. The Civil Aviation Authority, for example, does not necessarily know what kind of provisions can be made in local plans and whether its requirements even fall within the scope of such a document. On the other hand, the planners representing the authority and the legally defined "mandatory" planning stakeholders in such a participatory framework are unable to learn from each other or the "external" actors in the process. This contradicts the idea that "it is not participation if it does not include the education of the agency" (Innes & Booher, 2004: 426) and does not create institutional capacity (Healey, 1997). This approach has implications beyond mutual learning. Lane (2005) argues that "the way in which planners and policy-makers define their field and approach their work is to a large extent indicated by the role they provide to nonplanners" (Lane, 2005: 284). In this context, the Polish planning system can still be classified as a top-down, technocratic procedure.

The transparency of the process is disturbed by its very complexity. In the absence of capacity building, stakeholders are unable to follow all the steps and procedures. This naturally reduces their empowerment.

How decisions are taken is far from the ideal of a collective process. Although deliberation is emphasised as the inherent component of collective decision-making in collaborative planning (Forester, 1999), two alternatives – bargaining and voting – can be useful under specific circumstances (Allmendinger & Tewdwr-Jones, 2002). The debate takes place only in relation to some of the documents. In theory, the debate should be oriented towards consensus building, which is a way to execute collaborative decision-making. "In consensus-building, the aim is to work towards a common vision of what can be achieved, before working out the details of how to achieve it" (Rydin & Pennington, 2000: 155). If the debate is carried out at the final stage of the procedure, a common vision cannot be discussed. This kind of discussion can only be analysed as the so-called DAD model: decide, announce and defend (Coppens, 2014). This "debate" aims to placate stakeholders by making irrelevant changes to a project that has already been virtually accepted by the "entitled". The participants do not decide on the values, the goals or the means to achieve them. At most, they are put in the position of defending their particular interests. The transformative power of dialogue cannot be unleashed if the process is not designed to be interactive and interpretative (Healey, 1992).

Some stakeholders who have the power to approve a draft document impose decisions they consider right only from their own point of view (sometimes even beyond the powers laid down by law, as confirmed by the judgments of the administrative courts, e.g., II SA/Wr 54/11). This is, for example, the case with heritage protection authorities. Sometimes there are informal negotiations between planners and the heritage office. Still, the former are in a weaker position as they are legally required to obtain the consent of the latter. The opinions of various stakeholders, including institutional ones, are considered or not, depending on the planners' views or the political decision of the authority they represent. Here, in contrast, planners are in a position of power. It cannot be therefore said that "people have a right to a say on policy and should not be by-passed by technocratic means" (Rydin & Pennington, 2000: 154). The right to vote is

reserved only for the commune or regional council that approves the project.

Thus, it can be recapitulated that, among the forms of collective decision-making in planning, deliberation is flawed, negotiation is coercive, and voting is essentially unavailable. In Poland, "bureaucratisation" is indeed "the reality of participation in practice" (Rydin & Pennington, 2000: 153).

The points of entry into the process are strictly regulated. The ways of participating are also rigidly defined (i.e., as submitting proposals, giving opinions or approvals, and making comments). This does not allow for the creation of diverse and fluid discourse communities (Healey,1992) and self-organisation in terms of both content and membership (Innes & Booher, 2004). In other words, informality cannot emerge in planning processes. Openness and inclusiveness are not qualities of the process.

The answer to the question of whether the planning procedures ensure the conditions for the emergence of a Habermasian consensus (comprehensibility, sincerity, legitimacy and truth), in which collaborative planning is rooted, must be (at least partly) negative. Communicative reasoning, the method used to reach consensus, is oriented towards others and allows actors to harmonise their plans, whereas the procedures in the planning system rather ensure the achievement of individual goals (be they institutional or individual).

5. Conclusion

The collaborative turn in planning aimed to increase the legitimacy of decision-making. In this context, "public participation is a measure of the overall legitimacy of the policy process" (Rydin & Pennington, 2000: 154). However, participation in decision-making must be operationalised in such a way that it provides opportunities for interaction and genuine debate between actors with equal access to a process conducted in an open and transparent manner. Collective decision-making must be built into this process.

This paper examines how collaborative planning is operationalised in the most common planning instruments in Poland as they were defined before the major amendment of the Planning Act in 2023 and whether it ensures real stakeholder participation in decision-making. In this context, major deficiencies in the process have been identified. Not only do the procedures fail to provide adequate access to the whole process, but they also deprive it of the essential aspect of the collaborative approach, which is to create a forum for debate between different actors and to ensure their influence on the decision-making process. It has been shown that the procedures do not guarantee openness and transparency and that there are significant inequalities between the actors involved in the process. In the Polish planning system of the last 20 years, the truly participatory – not to mention collaborative – approach has been declared to be in operation but in reality seems to have existed only on paper rather than in practice.

Collaborative planning can be instrumentalised as a means of gaining and retaining power. Van Gool (2003) argues that electoral considerations rather than actual beliefs underpin decision-makers' declarative support for participatory approaches. This also seems to be the case with the planning system in Poland over the last 20 years.

Although in the period between the submission of this article and its publication a significant amendment to the Planning Act was adopted, changing some aspects of the procedures for drafting planning documents, our work is not only of a historical nature. On the contrary, it can serve as a model for evaluating the new system in terms of operationalising the collaborative planning model. It also provides comparative material for assessing whether the new system is closer to the collaborative planning model.

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