Stakeholders’ perspectives of public participation in landuse policy: the Nigeria experience

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Abstract

Purpose – It has long been recognised that the top-down approach is prevailing over bottom-up approach in landuse planning in African countries. The purpose of this paper is to evaluate and identify the facilitators and limitations to have effective public participation (PP), and suggest how the practices can be improved in Nigeria.

Design/methodology/approach – Using Nigeria as a case study, this paper involves interviews of various stakeholders, including government staff, representatives of interest groups, general public, members of the planning board and planning commission. Information is analysed by narrative techniques of reporting.

Findings – There is a general judgment that PP is vital to landuse policy. Early public consultation was preferred, as many respondents pointed out that this would help shape the final policy. Yet, their opinion varied on whether relevant information was provided to the public, as well as their level of satisfaction with the whole process. While the process was fairly seen as giving opportunities for the public to make comments on public policy, the approach appeared not to be fruitful in many cases: (a) when the scope was broad; (b) lack of representativeness and abstruse information; (c) insufficient feedback to the participants; and (d) corruption and shortage of resources to complete the process promptly.

Practical implications – Understanding the facilitators and limitations that impact the success of PP can help provide guidance to improve the decision-making processes of public policies.

Originality/value – This paper fills the knowledge gap by providing the Nigerian experience on stakeholders’ perspectives of PP in developing countries.

Keywords Public participation, Stakeholders engagement, Collaborative planning, Town planners, Urban management, Physical development policy

Paper type Research paper

Introduction

Over the years, two main tendencies have marked public policy in landuse planning. On the one hand, it is a tendency towards de-politicizing decision-making. On the other hand, there have been demands for more participation in decision-making and more accountability on the part of politicians. These two tendencies have been regarded respectively, as the top-down and bottom-up approaches (Murray et al., 2009; Nguyen-Long et al., 2019). Regarding the latter, the criticism, or even the remarks on issues like the classification of urban uses, the practice of zoning and the utilization of planning standards, which constitute basic features of landuse planning are totally absent (Pissourios, 2014). This situation underlines the planning theory-practice gap that has been discussed previously (Berardo and Holm, 2018; Nguyen-Long, et al., 2019). As such the top-down approach tends to dominate over the bottom-up approach across a diverse, international terrain, which is the case among African countries. Even if planning practice was dominated by top-down ideas, the quest for a landuse
decision-making system that considers people’s thoughts more and allows greater public participation (PP) comprises an acceptable objective. Intrinsically, such a system tackles the fundamental flaw in top-down models: which starts from the perspective of decision-makers and thus tends to neglect other stakeholders (Oloyede, 2010).

Under the Nigerian Urban and Regional Planning Law (NURP), there is a management system that ensures people are effectively engaged in landuse decision-making. The Town Planning and Land Services Department (TPLSD) which manages and regulates the use of land, engages in rounds of public hearing as part of its statutory landuse planning process (Ojigi, 2012). However, this democracy system had suffered from a series of disappointment under a succession of military coups. After the return to democracy, TPLSD has undertaken many development plans reviews and embarked on intensive meetings and consultations resulting with a new physical development and land policy reform. Some of these are seen in the Land Use Act Cap L.5 of 2004, the establishment of the National Technical Development Forum on Land Administration, and the Presidential Technical Committee on Land Reform among others. According to Ukaejiofo (2010), all these strategies were meant to set the new land policies direction in Nigeria with new land management strategies. In particular, these new policies were supposed to be set in consideration of Nigerians’ public opinions and values for places.

Contrary to the above, the media has revealed mounting disapproval from members of the public regarding the alleged failure of the government (TPLSD) to engage in discussion and to improve its PP practices. A lot of questions have been raised as to whether the TPLSD’s emphasis on understanding Nigerian values for places; and existing PP processes are too restrictive in terms of encouraging effective public engagement. At the same time, there is concern that while there may be increased awareness by some of the public for the need to be involved and for their opinions to be appropriately heard and considered, few people actually make the effort to become involved in the participation processes. It is unclear whether the TPLSD’s existing landuse planning processes are enabling ample PP. However, all these are mere media hullabaloo and yet to be empirically substantiated. Nevertheless, the implications such media racket has on public policy approval can be profound and actually beg the inquiry regarding the effectiveness of PP in the statutory landuse policy review processes.

Previous studies have shown that the challenges of PP are more complex in the traditional cities of Nigeria, owing to socio-cultural, historical and behavioral pattern of the people (Ojigi, 2012; Jiman et al., 2017). Some have argued that the military system of government has been a spell on PP (Oloyede, 2010). Lemanski (2017) argued that democratic government has potentials to support participatory planning since it shares similar principles. Conversely, Jiman et al. (2017) have shown that power sharing in participatory planning process is yet to be effectively adopted between citizens and government in Nigeria. Whereas extant studies focused mainly on the perceptions of the general public, this present study gathered information from various stakeholders, not only the general public, but also the staff of TPLSD, representatives of interest groups, members of the planning board and planning commission. Besides, there is scarcity in the literature on evaluations of PP effectiveness among developing countries. This paper fills the research gap by providing the Nigerian experience on stakeholders’ perspectives of PP in a developing country. This study therefore evaluates the effectiveness of PP, identifies the facilitators and constraints to effective participatory planning, and areas of possible improvement. Based on the findings of this study, recommendations will be given to improve the practices of PP processes.

The sections of this paper are organized as follows. It starts with the conceptual approach of this study, followed by the methodology to address the research problem. Then, findings and discussion of the results are presented. The last section concludes this paper and highlights the opportunities for future research.
Stakeholder theory as conceptual approach

The rationale of this study draws on the stakeholder theory. According to Freeman (1984), stakeholder theory recognises the existence and importance of various stakeholders and their needs in relation to public policy. Freeman (1984) describes a stakeholder as any group or individual who can affect or is affected by the achievement of a particular goal. In another view, stakeholders are those groups or people from whom the proponent (of a public policy) has voluntarily accepted benefits and to whom the proponent has therefore incurred obligations of fairness (Tambunan, 2015). According to Phillips (2004), two types of stakeholders exist: normative and derivative. The normative stakeholders are owed an obligation by the proponent, while derivative stakeholders hold power over the proponent and may exert either a beneficial or harmful influence on it. Therefore, in the case of land use administration, the normative stakeholders are government (departments, ministries or agencies), land investors and local residents; while interest groups, environment activists, civil societies and NGOs are not normative but then, proponent must also give attention to their views (Tambunan, 2015).

Stakeholder theory has been applied in many cases, for example in financial and corporate management (Phillips, 2004), natural resources management including land use administration (Tambunan, 2015) among others. While the stakeholder theory emphasizes the need to consider the perspectives of all stakeholders that are critical for the achievement of a goal, previous studies related to land use administration, have typically focused on specific landuse (forests, tourism, parks etc.) and general public (local residents) perceptions, paying limited attention to the government staff and interest groups. Furthermore, landuse studies on third-world countries are underexplored. This paper fills the knowledge gap by making available the Nigerian experience on stakeholders’ perspectives of PP in landuse policy in developing countries.

Research method

Data for this case were collected through a study conducted by the author with the assistance of the Population Welfare and Empowerment Foundation (a non-governmental organization with a mission to promote population well-being). The approach involved interviews of stakeholders that have, in one time or the other, contributed towards land use decision. Because the respondents are specific and it is difficult in approaching them openly for this kind of research, the first respondent was identified from the acquaintance of the author who was a relevant stakeholder, that is through convenient sampling. Subsequent respondents were then referred by the previous respondents, that is snowball sampling. A total of eighteen key-informant interviews were conducted. For qualitative research, a minimum sample size of twelve is required to reach data saturation (Vasileiou et al., 2018). Therefore, having eighteen respondents was considered satisfactory for the qualitative analysis and evaluation criteria for this study. The interviews consist of the following respondents: (a) 3 representatives from interest groups; (b) 7 from general public; (c) 5 from government (TPLSD) staff; (d) 2 from Planning Board; and (e) 1 from NURP Commission. The commission and the board are to respectively formulate national and state landuse policies while government staff (TPLSD) implements these policies and undertakes development control within its area of jurisdiction. Members of the public are those who use the land in the proposed plan while interest groups are those concerned with conservation or scientific use of the land.

Based on the NURP Decree No. 88’s Section 13 and 16 of 1992 (emulating some of the Ladder of Citizen Participation framework [Arnstein, 1969]), eight evaluation criteria were developed to guide the interview (See Table 1). Among this framework, the interview topics covered: purpose of public involvement, level of involvement, methods for involvement,
results of PP, the resources and capacity as well as representation of PP. Respondents were asked to comment on landuse review using the selected framework. The interviews were conducted under fairly good conditions in their offices, homes and relaxation centers, and some were conducted by phone conversations. This study upholds an avoidance of harm, confidentiality and informed consent during interview. Information was further analysed by narrative techniques of reporting.

Findings and discussion
Findings and discussion are presented as follows. Unless where otherwise stated, the narratives are the summary of the outcomes of the interviews carried out in September 2016.

(1) General view of public participation

PP was identified by most respondents as a way of “putting the ball in the court of the public”. PP was described by one respondent as being “a process to create collective proprietorship”. A respondent described PP as providing a prospect to get interested party “buy-into” and to “get the public on-board” to back the implementation of the plan, and that it could help build trust between government and stakeholders. While there was an opinion shared by the respondents that PP is vital, the expected level of that participation and the observed importance of the process differed across respondents. Many respondents were distrustful about the PP process and felt that often, TPLSD was just fulfilling “all righteousness”. In an unequivocal statement, a respondent said:

I have little confidence in the PP process. They (TPLSD) have to do it because the law requires it but they don’t have to take notes of our comments. When I was involved few years ago, I and most of my co-participants making suggestions did it for just record sake believing it was a futile process, but then, we thought our opinions should be added to the project (Male/Member of the public).

A number of stakeholders, particularly those of TPLSD, board and commission somewhat believed that there are plenty of opportunities for the public to be involved in landuse policy, but people don’t really get involved in the process. A respondent said “PP is often a requirement for us (TPLSD); however, it is always optional for citizens”. Another said, “in two instances I had been engaged, public involvement was very low and discouraging”. Another respondent further commented that:

| S/N | Framework                  | Definition                                                                 |
|-----|----------------------------|---------------------------------------------------------------------------|
| 1   | Early involvement of people | The public must be involved early.                                         |
| 2   | Effective forums           | The public must be able to participate in an effective environment.        |
| 3   | Enabling process           | The process seeks out the involvement of those potentially affected by or interested in a decision. |
| 4   | Feedback                   | The process communicates to participants how their input affected the decision. |
| 5   | Influence                  | Issues of concern to the public must be taken into account in reaching a decision. |
| 6   | Information                | The public are provided with the information that they need to participate in a meaningful way. |
| 7   | Representation             | The process must comprise a broadly representative of the affected public. |
| 8   | Timeliness                 | Deadlines and realistic milestones must be managed during the process.     |

Table 1. Summary of evaluation structure

Source: Adapted from (FRN, 1992) the NURP Decree No. 88 Section 13 and 16 of 1992.
At the end of the whole process, we usually discover that less than what is provided for in the law actually took part in the process. This usually happen because the people’s attitudes to PP process is poor (Female/Planning board).

A considerable number of respondents suggested the need to identify causes of low participation. For directions, it seems that respondents unanimously agreed that those people or groups in the society who are discouraged, probably because of a lack of means, previous experience, or motivation may need to be assisted probably through more sensitization, technical advice, social and humanitarian support and incentives.

The regularity of landuse reviews was also raised. There was a wide agreement among respondents of the importance of regularly reviewing landuse plans to take account of urbanization, environmental, social and landuse changes. The demands and pressures on land change over time and a plan review was described as providing the opportunity to keep pace with pressures while maintaining the values of the land. On this account, most respondents commented that a landuse plan review should not be left much longer (than 10 years). Some respondents suggested that ideally, landuse plans should be reviewed more regularly, but this was thought unrealistic by some respondents, as some plans had taken many years to be finalized. In some cases, there had not been an active landuse plan in place for a long period of time. For example, a respondent said:

A serious country should only have a 10-year approach to landuse policy. But it’s a problem when it takes even more than ten years to write a plan in this country (Male/Representative of interest groups).

(2) Public participation process

Respondents were asked to evaluate the PP processes they had been involved. Respondents commented on four issues as follows:

(a) Pre-meeting or early involvement of the public

Most respondents who are members of the public and representatives of interest groups said that the process was weak regarding pre-meeting. Many respondents argued that most times, TPLSD did not carry out broad pre-meeting before developing a draft policy. Many respondents believed that this consultation provided an opportunity to solicit ideas, identify potential matters, address any concerns, and look for solutions before the formal process starts. It was also suggested that making contact with stakeholders before the official process can help build people’s confidence to engage in the formal process of proposal writing and public hearings. On the contrary, majority of TPLSD’s staff interviewed argued that for most of the time, they carried out extensive pre-consultation before developing a draft policy, however, community members did not always respond.

Respondents further showed that one key element for successful early meeting was having the right people involved and “shoulder tapping those important persons in communities”. In some cases, TPLSD had invited representatives of interest groups to facilitate discussions. Some respondents suggested that, as previous experiences may have made some people cynical of getting involved in PP processes, these independent representatives can motivate people to become involved. Some respondents noted that it is also essential to have the right personnel representing TPLSD:

I believe relationships are the most important thing in life and also in this process. TPLSD needs to be very careful about who heads their works. The PP process, particularly the early stage should be managed by experienced and well-trained personnel who are good at consulting and dishing out ideas (Male/Member of the public).

While most respondents expected a head-on meeting with TPLSD staff at the pre-formal stage of the PP process, some noted that the emphasis of meeting was more important than
the approach. Many respondents approved that it was important to put limitations around what was before the meeting and to highlight the key issues for discussion. Examples were given where TPLSD staff had gone to have a meeting with communities without a clear purpose or framework for the discussion and had created confusion. Most of these meetings seemed to happen with individual stakeholders or with groups with the same interests. Thus, the provision of fact sheets with synopses of the plan process and key issues was suggested by respondents as a useful guide for pre-consultation meetings. Some respondents suggested this method, as with a compatible group, there is less confusion, annoyance, disagreement and more chances that an accord can be reached promptly.

A number of respondents suggested that there should be more opportunities for different stakeholders to work together and hear the views of one another. The policy consultation process could become a forum for potential conflict between interest groups. A few respondents argued that bringing different interest groups together to discuss topics and problems offered an opportunity to create more integrated solutions for TPLSD:

For the one I took part, there were individual stakeholder meetings, but there could also have been some targeted group engagements. It can be good to listen to other viewpoints, principally for integrated physical planning (Male/Member of the public).

Another respondent said:

To bring about the real change, we need to pick a cross section of stakeholders and interest groups. We should bring groups together to see opposing views in the same meetings and hearing. The process of seeing groups separately is not the best practice and shows a lack of managing skills (Male/Representative of interest groups).

Many stakeholders were aware of cases where there had not been any meeting prior to a draft policy being notified. Conversely, an example was given where an interest group declined TPLSD's offer of pre-meeting and instead, "came down like a deafening lion" in the formal proposal writing process. However, most respondents valued this pre-consultation and requested TPLSD to give people enough notice. It provided an opportunity for TPLSD and stakeholders to build relationships and address any potential issues and problems before the formal planning process began. Early involvement should also assist in time management. The better prepared and more proactive TPLSD is in seeking PP and understanding the range of values affected by the plan, the less likely it is that there will be delays in the process caused by conflicts that could have been foreseen and avoided. The public also needs to be reminded that, irrespective of whether it is involved in the early consultation phases, its members should still comment including where they are in support and against the policy’s interventions.

(b) Preparation of proposals

After the pre-consultation and once a draft policy has been notified, the public are invited to make comments on the draft policy. Findings show that respondents attended a public or interest group meeting after the draft plan had been released. Respondents also indicated that the meeting had been helpful in improving their understanding of the issues covered in the policy. However, some believed the meetings were not helpful: “In my own opinion, the meeting did not really change anything.”

Respondents confirmed to have received some forms of information outlining the key issues for the review of the proposed landuse policy. Some respondents who received this indicated that the information was very pertinent to their suggestions, and that the information was supportive in understanding the salient issues covered in the proposed policy. But others indicated that the information was irrelevant and criticized that it was not understandable and helpful. A respondent said: “there are too many technicalities. For some of us, it was too difficult to comprehend” (Female/Member of the public). To this end, there
was a general opinion among respondents that people needed to have skills and experience in physical development planning, and that it would be difficult for “just anybody” to engage in this process. A respondent said: “most time, those who complained that the information was irrelevant and incomprehensible also lack skills and knowledge of landuse planning and administration” (Male/TPLSD staff).

Majority of respondents upheld that making a printed proposal was the best way of participating. The reasons highlighted were because it was more convenient; provided the best opportunity to make considered comment; carried the most weight of influence and provided an official record. Just a few respondents favoured meetings to discuss the review. In this regard, respondents who presented their view in a formal public hearing commented on the manner in which the hearings were conducted and their experiences of the process:

It was not well-organized. A lot of participants did not use the hearing as an opportunity to develop their comments. It’s quite hard for them, especially those who are not experienced in attending such things. People are not sure whether it is a forum for discussion or not (Male/ Representative of interest groups).

Another respondent said: “participants did not know what to expect when coming into a public hearing. Sometimes, they found it intimidating and terrifying.” To assist them, respondents suggested that TPLSD could give community members an idea about what to expect: may be something enlightening on what would happen in the public hearing, and who would be on the panel. While some stakeholders said that public hearings went well in some instances, some remarked that the public hearing was “another combat boulevard as stakeholders with disagreeing ideas engaged in physical fights”. Besides, it was “fear-provoking” or “biased”, with no opportunity for debate.

(c) Provision of feedback

From the findings, a common tune by respondents was the need for feedback. This includes receiving regular feedback during the process, being notified about how the proposal was considered in the final decision. Findings show that less than half of the community members and interest group representative reported receiving feedback with over half saying they did not receive feedback on their suggestion in their previous engagement. Some respondents remarked that it took a lot of resources to prepare and present an effective proposal and they would appreciate a feedback on their proposal.

In this regard, a staff of TPLSD commented that “we should provide some feedback; nevertheless, there is no regulation for compulsory feedback”. Whereas, a number of respondents stated that it was important to provide feedback:

TPLSD needs to let people know how their proposal contributed to the policy in order to create collective proprietorship. . I’m encouraged about the running of the public hearing but disappointed to see we don’t receive any feedback (Male/Representative of interest groups).

It’s a big irresponsibility to ask people to come to pre-consultations, write proposal, attend public hearings and not give them feedback on where things are at and also how their proposal was used. . If TPLSD wants people to participate again and again, let them know how their proposal contributed to the proposed plan (Male/Member of the public).

Findings show that if the justification for why a decision had been made was communicated, the public may be more willing to accept the decision. As there is no right of appeal once a policy has been prepared, it is important that feedback is provided to try and bring people on board, communicate the motivation behind the decision, and create shared ownership. Without any feedback, people can become skeptical about the PP process as evident in this respondent’s statement: “There is not much evidence that TPLSD takes notice of proposal. They are seen as a waste of time”. Nevertheless, just a respondent mentioned a case where the
TPLSD personnel ensured that participants received feedback at the time the policy was submitted. He stated that the said personnel kept a detailed record of how decisions were reached which, in the view of this respondent, made the process very transparent.

It was thus suggested that TPLSD should follow this process where the public is informed of the proposed decision before they attend a public hearing and can then contest and discuss it before a final decision is made. Similar to the above, many respondents were concerned about the delays and lack of any communication from TPLSD updating them on the process and letting them know what was happening. The use of the internet was commonly recommended as an avenue to provide up-to-date feedback. Overall, it seems like poor feedback, probably more than any other factor, influences participants to judge their participation experience as not too satisfactory. It is thus recommended that adequate feedback should be provided to participants.

(d) Decision-making

Findings show that stakeholders choose to participate because they expected a satisfying experience and hoped to influence the final decision. However, some respondents commented on the role of the planning commission and board, while a few commented on the right of petition. A few respondents were concerned that when stakeholders through PP processes reached consensus, these should then be binding. However, the TPLSD decision-maker seemed to have a large amount of discretion on what was finally considered. Thus, many respondents believed that PP can be a charade.

The findings from the interviews particularly highlighted that there was inconsistency in the promise that was made to participants in the process and the role of PP in decision-making. For example, some TPLSD staff and stakeholders argued that where accord had been reached during public hearing meetings, neither TPLSD nor the Technical Committee should be able to change the outcome. Overall, there appeared to be a need for greater clarity around the role of meetings at this stage because unclear and/or unrealistic expectations of the role of PP into the planning processes are likely to lead to participants being less willing to contribute in the future and a feeling of “being cheated”.

The right of appeal was another component of decision-making that received some comments. Several stakeholders were concerned that there was no right of appeal once the decision had been made and there was no access to the commission after the public hearing. The need for a transparent, democratic process was strongly stressed by some respondents, and a suggestion was made that a petition could happen before a draft plan was sent to the planning commission. Some respondents believed it was too late to make changes once it had reached the commission, and this has the potential to weaken and undermine the PP process and trust between TPLSD and the community. A respondent commented:

In an ideal world, there should be opportunity to appeal the draft development plan, possibly after it’s gone to the technical committee and before going to the planning commission. If there is one point that the public really don’t agree with, then they can appeal (Male/Representative of interest groups).

One concern raised by a few respondents was that decision made by TPLSD in consultation with local communities could be amended without any need for further meeting with the communities. However, there appeared to be differing perspectives amongst TPLSD staff about how binding opinion reached during the meeting and consultation process, as shown by the following comment: “I developed good development plan and policy with some user groups but made it clear that this would still be tested through the PP process”.

Regarding decision-making, findings show that conflicts did surface and these were solved through either mutual agreement and/or Planning Tribunal. However, considerable conflict results from agencies, board and commission being directly and/or indirectly seen as judge, jury and plaintiff in contest over decision: “there is yet to be a true independent
committee to arbitrate cases; even the Planning Tribunal established by law is not truly independent of the government or Planning Commission”. Many respondents stressed the need for the commission to move towards the role of social facilitators rather than their more known roles of being arbitrators (always influencing planning tribunal) and decision makers all together. To this end, clarification of decision-making roles between the bureaucracy, the public and the legislature will help this process. However, past cases will prevent planning agencies, board and commissions from playing the role of facilitators in issues where they are seen as having a vested interest themselves; or, alternatively, as being the representatives of government. In these situations, independent mediators (probably the court of competent jurisdiction) can be neutral third parties who can help stakeholders move beyond conflict to agreement. The key characteristic for selecting mediators should be mutual acceptability to all stakeholders. The mediator must be able to develop sufficient trust in the even-handedness of the process so that parties can see the possibility of agreement.

(3) Resources and capacity for PP process

Respondents were asked to comment on the resources and capacity necessary to effectively engage in a PP process. In terms of community stakeholders, as previously discussed, many of the respondents interviewed considered themselves to have the skills and resources to engage in the process. In relation to TPLSD’s resources and capacity, many respondents expressed frustration with the prolonged process and thought that they were due to a lack of human power to complete the work in time. Importantly, the concern about lack of feedback was exacerbated by the lengthiness of the review processes. Besides, corruption, low recruitment of town planners, combined with a perceived low priority put on policy review in Nigeria, were common reasons given for a lack of impetus and progress:

Corruption and bribery are playing out here. There were instances of bribery, fraud, favouritism, nepotism and clientelism in this process; TPLSD never seems to have enough staff. The process falls over by delay. Some processes we ought to have finished in fifteen months will tarry longer and because it takes so long, the people who wrote proposal are heartily fed up with it (Male/Member of the public).

The discussion revealed that some people have been convicted of corruption while managing planning review process. Some have been sentenced to jail, others have been asked to pay fines while some were served both. Besides, some staff have been dismissed, demoted and suspended from their various positions in the urban planning administration. Where there are fewer staff works on the review, there were some concerns that they may become isolated or take ownership of the document and this made it difficult to undertake an open collaborative consultation process. Findings show that TPLSD staff worked as a team on a policy with less personal ownership of the document. It was also suggested that the town planner is not always the best person to lead and facilitate a PP process but rather, someone with community engagement skills can lead that part of the project:

My few years in public engagement show that TPLSD is lacking in public management skills. People at management level have often come up through the ranks and files and TPLSD hasn’t paid enough attention to training these people to develop PP skills (Male/Representative of interest groups).

Few respondents said the open and accessible process was strength to the policy review they have participated in, while political meddling was seen as a weakness. It was generally recommended that, as an improvement, the process should be more open with less political interference. In addition, respondents commented on the length of the review processes, with the length of time it takes for a plan to be finalized being seen as a substantial weakness. While allowing open access for people to be able to participate effectively, more effort needs to be made by TPLSD to ensure that the review processes do not drag on, as they sometimes
take as much time. It is essential that the time periods for policy reviews are revised, and two areas where improvements can be made are in increasing resources and introducing legislative timeframes. This criticism is highlighted by people not receiving updates during the process, or feedback on how their submission was used. The slow process and lack of feedback is likely to result in people losing interest and not bothering to participate in subsequent review processes.

(4) Representation in the process

In this regard, respondents were asked to comment on whether the breadth of public representation in the policy review they participated was adequate. Outcomes suggest that all interests were not sufficiently represented. A respondent said:

It was another ethnic and tribal consultation. The whole process was as if some of us were invited to observe. Only one set of people constituted above fifty percent of the hearing, whereas, this policy affects us all equally. The invitation was said to have been proportional and I asked myself, where is the proportionality? For this first time, I felt I was not part of this country (Male/Member of the public).

Another respondent narrated his experience as follows:

I have only heard of 80:20 rule but I saw it play out for the first time when represented my community in a public hearing. In my case, just few participants determined majority of the outcomes (Male/Representative of interest groups).

Findings from the interviews further suggest that whilst there was some sense of unequal participation and influence, it seemed to be associated more with the lack of feedback (examined further below) delivered, so that respondents did not know whether or how their contributions had been applied. Lack of feedback may well breed conspiracy theories (Nguyen et al., 2015). There was a common view that PP in Nigeria could be tailored to “stakeholders’ consultation”, rather than general. A few of the respondents who have witnessed PP abroad said: “the best global practice for PP is stakeholder consultation”. It seems that the problem with PP in Nigeria has been that of the general PP. In this respect, some respondents commented that the authority could spend a lot of time and resources inviting interest groups and individuals who may not necessarily be interested in the whole process. A respondent said:

In every part of the world, we always, at any point in time, have people who are interested in something and those who are not. It must be noted that interest matters. Where there is no interest, the whole thing (PP) becomes tiresome to participants no matter how attractive it is. Hence, the authority should consider stakeholders’ participation instead of the general public (Male/Representative of the interest groups).

Interestingly however, this view is not shared by all government staff, board and commission members interviewed. Some believed that there is nothing wrong with general PP and that citizens just need some motivations and for them, a respondent said:

For us, we can always beat ourselves up about how we can get the general public to become engaged in PP. For me, I’m convinced that there is an appetite for many more people to be engaged in public issues such as this with some little motivations (Male/Planning commission).

Notwithstanding, many respondents reiterated the importance of the review process providing opportunities for TPLSD to work collaboratively with all stakeholders and to bring interest groups together. Stakeholder consultation was largely supported by the respondents who generally argued that consultation on policy review should be targeted at key stakeholders, not the ‘general public’, and that it would be difficult for the ‘general public’ to engage in the process.
They argued that, stakeholders would be more likely to have the skills, expertise, and resources to participate in the processes. Nevertheless, it was also considered important, by respondents, for TPLSD to understand that key stakeholders in an area will change over time and that it is always important to seek new and emerging stakeholders. Without some form of periodic community assessment, new stakeholders are not likely to be identified. As part of each policy review process, TPLSD will need to identify new stakeholders.

While considering stakeholders consultation, respondents indicate further that planning authorities will need to focus on improving its interest representation. A narrow participant base may lead to unintentional bias, with those stakeholders that are knowledgeable about political processes and decision-making, and organized and articulate, predictably having an advantage over others. Ensuring that there is broad representation will help reduce the potential for unequal influence. At all times, having adequate public and interest representation is very relevant.

**Conclusion**

This study has examined the PP processes in landuse policy in Nigeria. The provisions for PP in the NURP decree require proposers to actively seek public opinion, allowing sufficient information guide, community-meetings and time. However, the issues emanated in this study refute these provisions. Most importantly, the scope of PP is too broad; there is lack of interest and representativeness, insufficient feedback, lack of resources as well as the public being unclear about the process itself. Thus, in seeking future engagement from the public, TPLSD should actively facilitate involvement of all diverse community groups, particularly when reaching out to new groups of people; ensure prompt release of unambiguous information and sufficient feedbacks; adequate funding; engagement of competent PP experts; as well as transparency of the whole process.

Finally, this study has some limitations. Because of the interview and open-ended nature of this study, there is a likelihood of respondents’ preconceived notion. Future study should tend towards closed-ended interview. The findings and discussion are largely built on descriptive narratives without giving focus to the analysis and interpretation on how diverse stakeholders with varying interests interacted. Furthermore, if the contexts of this study can be framed together with other urban planning elements such as transportation and access, housing, commercial and urban-rural migration, they might help generate interests from the stakeholders. Besides, caution should be applied in drawing conclusions from rather small and non-randomized sample selection methods. Relatively bigger respondents and more randomized surveys would need to be conducted to corroborate these findings. Another area of prospect for expanding this research is the development of more case studies. For instance, it would be a sharing of knowledge and experiences between Nigeria and other countries. Future analysis should endeavor to consider using quantitative data. These limitations, however, do not diminish the relevant suggestions for public policy administration that arise from this study.

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