

## IV-57

### COMPARATIVE PLANNING STUDIES: JAPAN and EUROPE

#### 1) INTRODUCTION

The purpose of this paper is to analyse the specific nature of comparative studies in land use planning between Japan and Europe, and to suggest a set of topical items of comparison, as well as a general pattern of relationship between these items.

#### 2) COMPARATIVE STUDIES

The essence of any study involving comparisons between more than one system of land use planning should be formed through an analysis of how different systems reconcile flexibility with legal certainty required for the functioning of democracy. A typical public function, such as planning, is the synthesis of the set of assumptions underlying the organisation of a national society. This factor means that conducting comparative studies mainly through description of these systems can be misleading, vague and may result in conclusions which are divorced from reality. There is a great degree of complexity involved in comparative research in public functions, particularly in planning, and discription ending with general conclusions implies oversimplification of physical, legal, social and economic phenomena. Therefore, comparative research projects should be topical. This means that a specific agenda of topics be established. This step will then be followed by an analysis of these topics employing not only description, but mainly studies of cases. This is different from 'case studies' in that they consume less time and effort, and produce more concrete results relating specifically to the topic under examination. They also provide a wider perspective on other topics, since they are more in number, and can relate not only the two topics under examination to each other, but also expose their intercation with the system as a whole. The final aim of such studies is to produce comparative issues. It

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is worth mentioning that not all comparative issues can lead to generaslisations.

#### 3) PROBLEMS of COMPARING LAND USE PLANNING in JAPAN and EUROPE

Many typical problems relating to comparative studies of this sort are encountered. Main problems include differences relating to civic and political cultures, general attitudes of institutions involved in the process, professional approaches to policy formulation and implementation, the role of property as a social institution, and, naturltally, the language barrier expressed through different interpretations of translations. This is best demonstrated in the meaning of the terminology 'Comprehensive Plan(ning)'. In Europe, this phrase is mainly used as a technical planning expression mainly meaning Master Planning or blue print planning. In Japan it is mainly used in its dictionary form to mean "inclusive, including much or all"(The Oxford Paperback Dictionary,84). The "National Comprehensive Development Plan", for example, indicates that aspects of economy, land use, transportation, society etc. are examined in one plan. Confusion also arises when dealing with the meaning of "Development Control". In Japan, enforcement of development control relates to certain activities only depending on size and location. Therefore, "development control" acquires mainly a specific meaning. In most European countries, however, all activities above and under the ground are subject to permission. Therefore, the meaning of development control is more general. This is one of the most important comparative issues, since it directly relates to the understanding of 'enforcement'. The scope and nature of enforcement are the leading elements in understanding the trade off between flexibilty and certainty in a system.

This is so because enforcement expresses the reality of implementing planning policies, i.e., the degree of social acceptability of the system. There is also a degree of ambiguity as to what

'local planning' means in Europe and in Japan. The third comparative planning problem relates to the capability of the Japanese planning system to employ mainly one type of method in achieving land assembly, i.e., Kukakuseiri method. This is difficult to understand within the European context because of the lack of a similar co-operative approach between local authorities and developers, the main vehicle for land assembly being compulsory purchase of land.

## 5) CONCLUSIONS

The main difference that emerges from comparing Japanese and two European systems lies in the nature of those systems, i.e., the Japanese Zoning Regulations as opposed to the European statutory planning systems. Statutory planning systems provide a very strong framework, legally and physically, within which negotiations are conducted either before plan preparation (Belgium) or before and after (Britain) to determine the format of the trade offs. Zoning Regulations, on the other hand, fall short of providing that framework, thus encouraging negotiations to be continuous and not as constrained as those conducted under a statutory framework, particularly that zoning regulations tend to be of a more technical nature. Therefore, the degree of informality in the Japanese system is higher resulting in emphasising flexibility in decisions. The two European systems examined, which may be considered as representatives of the scope of European systems, possess a greater degree of formality, thus emphasising legal certainty.

### 4) ITEMISED LIST of COMPARATIVE TOPICS

	JAPAN	BELGIUM	BRITAIN
<b>i- Civic Culture</b>			
Strong local autonomy	x	xxx	xx
Two-tier Local Gov't Regional Gov't.	o	o o	o
High administ. Discretion (reliance on admin. guidance)	xxx	xx	xx
Degree of Centralisation in policy making procedure implementation	xxxx xxxx xxxx	xxx xxx x	xx xxx xx
Central intervention in decision making	xxxx	xx	xxx
Regionalisation	x	xxxx	xx
<b>ii) PROFESSIONAL SITUATION</b>			
ARCHITECTS	xxx	xxxx	xxx
ENGINEERS	xxx	xxx	xx
PLANNERS (independ. Profession)	-	-	o
<b>iii) PLANNING SYSTEM</b>			
A) Comprehensive Planning Structure Planning Zoning Regulations	o	o	o
B) mainly physical mainly economic	o	o	o
C) Degree of Regional Planning	x	xxxx	xx
<b>iv) LAND USE PLANS</b>			
A) Regional City Local	o o o	o o o	o o o
B) Prepared by Local Authorities Consultants	o	o	o
C) Approved by Central Gov't.	o	o	o
D) Have the Force of Law		o	
E) Review Period Statutory			o
F) Consist of Conventional Map Diagram Map Policy Statement Written Document on Detailed Physical Aspects	o o o o	o o o o	o o o o

<b>v) DEVELOPMENT CONTROL ORGANISATION</b>			
General Purpose Permission Permission System Divided	o	o	o
Permission Granted by One Authority in Town Hall By More than One Authority	o	o	o
Permission Granted by : Local Authority Only L.A. & Central Gov't.	o	o	o
<b>vi) ENFORCEMENT</b>			
Statutory Discretionary	o	o	o
<b>vii) URBAN PLANNING CONCEPTS</b>			
Green Belt			o
New Towns	xxx	x	xxxx
City Conservation	xx	xxxx	xxx
Nature Conservation	xxx	x	xxxx
Large Housing Developments	xxxx	x	xxxx
Land-use/Transport Efficiency	xxxx	xxx	xx
Compulsary Purchase	x	xxxx	xxxx
Land Readjustment (No Compulsary Purchase)	o	-	-
Participation:			
Strategic			o
Local	o	o	o
<b>viii) NEGOTIATIONS</b>			
A) Agreements between L.A. and Developer Concerning:			
Land-use	xxxx	x	xxxx
Physical Aspects	xxxx	xxxx	xxxx
Community Gain upon granting Permission	xx	xx	xxxx
B) During Plan Prepar. After Plan Approval	xx xxxx	xxxx x	xxx xxxx
C) Change of Land Price due to Negotiation After Plan Approval	xxxx	x	xxxx
<b>ix) LEGISLATION</b>			
Degree of Fragmentation	xxxx	xxx	xx
Constitutional Protection of Property Rights	o	o	
Relationship Admin. Appeals/Permission	x	xx	xxxx
Administrative Court		o	