

Processes of Urban and Rural Development: a Comparative Analysis of Europe and China.

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ABSTRACT

China, in its construction fever, has imported from Europe a great range of architectural and design features. The planning systems of China and of most European countries are based on functional zoning, allowing meaningful comparison. Nonetheless, the process and goals of spatial planning differ markedly and China largely ignores the distinctive progress achieved in the field in Europe. Across Europe, the model of planning is undergoing important transformations in the last decades, gradually making decisions concerning land-use more participated, flexible and sustainable, and safeguarding the rural dimension. In contrast, the planning system of China is primarily focused on promoting urban GDP growth and is still based on a top-down approach. The inclusion of some key elements of European

planning into the Chinese system, with particular reference to laws establishing national standards and comprehensive environmental protection, would benefit China by reducing the internal inequalities between cities and countryside and safeguarding its natural assets.

Introduction

This research analyzes the similarities and differences between the two apparently opposite patterns of urban and rural development of Europe and China. Most European countries apply a zoning approach not too different from that of China. Nonetheless this research points out that European zoning is gradually evolving towards a more incremental and participated system, led by the UK, that could be taken into consideration by China in order to reduce the strength of its top-down decision-making processes and thus improve the outcomes of its planning provisions. China often copies the traditional architectures of the most famous tourist spots of Europe, but seldom looks at the leading urban planning practices of "the old continent" to improve its own performances in the field.

Moreover Europe and China have an opposite perspective concerning territorial inequalities and the urban-rural divide. On the one hand, the European Union and European national governments tend to transfer planning powers from central to local government and resources from the richest areas to the poorest, from cities to rural areas. On the other hand, China's zoning standards are only in force within the administrative boundaries of cities and government focuses centrally driven public investment into the main poles of the national economy, with dramatic effects on internal inequalities. These differences are also reflected in the degree of involvement of the most disadvantaged and deprived communities in forms of bottom-up processes of local government and in *Agenda 21*, which is very high in some European countries such as the UK, and practically non- existent in China.

This article provides some relevant examples of successful zoning

provisions aimed at environmental protection which are in force in the European countries and which could possibly influence China's legislation, where the loss of rural land has never been effectively tackled in the recent decades of economic boom. Therefore, the object of this research is to demonstrate that there is a European way of planning, based on participation, equal rights against the State and, increasingly, incrementalism, which could positively influence the system of governance at the local level in China. It also aims to fill the lacuna in the available literature concerning the knowledge exchange between the two, since the media and academic articles are too focused on analyzing the often ephemeral stereotypes of European architecture that penetrated China in the last decades.

The similarities and differences between Europe and China are described, analyzing the planning legislation at different scales, and comparing the findings with the most relevant literature already available. Thus the research method is mostly based on the comparative analysis of quantitative and qualitative secondary data, with a positivist approach aiming to establish relations of cause-effect between the national legislations and practices and the outcomes on field. We do not assume that the good practices identified in a specific geographical area would necessarily generate similar outcomes in different contexts, but meaningful case-to-case examples are offered from a comparative standpoint to suggest different perspectives and innovative approaches to governance to those who might be concerned.

SIMILAR PATTERNS OF URBAN DEVELOPMENT IN CHINA AND EUROPE

Between the middle of the 19th century and the years following the Second World War there was an urban population explosion in Europe comparable with that of contemporary Asian countries like China (Grigg, 1980, p.254), leading to a dramatic transformation of the cities. In the central areas, the high streets were enlarged, older buildings were redeveloped to make them more comfortable with improved hygienic standards and to make room for offices, theatres and shops. New development areas for urban uses were created outside the ancient city walls, often producing a supply of housing in excess of the demand (Bruegmann, 2008, p.33), as in contemporary China (Chang, 2013). In most of continental Europe the most effective instrument

to establish a centrally driven strategy for urban development was functional zoning, able to promote and give certainty to private investment on one side and to prevent the destruction of natural or historical values on the other. The same applies to contemporary China where the government's power to enforce its top-down decisions is as strong as that of the non-democratic European governments before the Second World War.

It is possible to say that the newly developed areas in the main cities of China are mostly rigidly divided by function and residential areas are designed for specific social classes (Veeck, et al, 2011, p. 292) similar to those developed in Europe in the early twentieth century. In fact an overly rigid model of zoning easily becomes a tool of social segregation (UN-HABITAT, 2009, p. 55) because of the physical divisions between wealthy and poor areas within the towns and the hierarchical pattern of urban land use it often embeds. Even though today's European housing policies actively encourage social mix much more than the Chinese, Europe did not manage to overcome the problem since the central urban districts are increasingly gentrified (Dines N. T and Dines N., 2012, p.45; Petsimeris in Atkinson and Bridge, 2005 p. 240) as they are in China (Goodman, 2008, p.179).

Surprisingly, European planning practice performs no better than the Chinese regarding urban sprawl, despite its lower population, the scarcer availability of land and the considerably lower rate of growth. As regards the increase in the area of built up land, planning instruments in China allowed an increase of about 1,287 km²/y (only considering the cities' administrative areas) between 1989 and 2000 (Bai, Chen and Shi, 2011) while the total increase in built up area in the European Economic Area (excluding Greece, Switzerland and the U.K.) amounted to about 1,000 km²/y (European Environment Agency, 2012, p.5) between 1990 and 2000.

Finally China's approach to urban planning is architecture, engineering and design oriented, similar to that traditionally adopted in Mediterranean countries. This approach is rigidly top-down and underestimates the importance of public consultations to ensure that the planned use of land benefits the largest number of people. This perspective on planning is very far from that of the UK, where issues of design are secondary compared to the incremental reconciliation of conflicting interests (Dunford, 2008, p.8). The right of the citizens to comment on plans and development applications

is stronger than that of most European countries since landowners are not granted the constitutional right to build on their land. This also strengthens the power of the planning authorities who have great discretion in managing development control. Recent attempts to introduce and strengthen zoning approaches in the UK for specific business areas reflect only economic rather than land use planning targets, aiming to reduce the burden of regulation on private enterprise, but they represent a break in the system of planning in a country where the grant of the planning permission never comes in advance of the proposal coming forward (Cullingworth and Nadin, 2006, p.140).

FASHIONABLE EUROPEAN URBAN DESIGN IN CHINA

In recent years a good number of Chinese urban plans and architectural projects hit the headlines of the media for they undeniably demonstrate the great interest in China concerning European styles of urban planning and design.

This interest is threefold. Firstly, there is a direct impact because impressive replicas of several European cities, villages and monuments have been erected all across the country. The Thames Town of Shanghai (Preece, 2012), the Alpine style village duplicating the UNESCO World Heritage Austrian village of Hallstadt in Huizhou (Parry, 2012), the Florentia Village in Tianjin (Foster, 2011) and the Chinese version of Salvador Dalì's home town of Cadaques in Spain (Rodriguez Baena, 2011) are the most relevant examples of this architectural fad. Surprisingly, European Architects are most often the creators of such kitsch urban districts. Secondly, at the opposite extreme, famous European architects prepare zoning plans for Chinese cities maintaining the traditional regular geometry of street layouts of China and a plain international style of zoning: Richard Rogers conceived the first redevelopment Masterplan for the financial centre of Pudong, Shanghai (Richard Rogers Partnership, 1992-1994), Vittorio Gregotti a Detailed Plan in Ningbo (Gregotti Associati International, 2006), Jürgen Engel the Qingdao Science and Technology City (Vinnitskaja, 2011). Thirdly, and most importantly, a European style of urban planning and design 'developed as a counter-model to modernism' (Urban, 2008), based on sensitive handling of heritage, with mixed land-uses, moderately dense settlements and respect for the human scale, has become an international conception of urbanism very popular in China.

In all cases, design and physical planning appears the aspects of urban planning where foreign expertise is most appreciated in China (Healey and Upton, 2010, p.305), particularly referring to European practice.

However, a more mature knowledge exchange between Europe and China regarding not only physical aspects of urban planning but cutting edge governance processes has dramatically increased in the last years (Sveriges Arkitekter, 2011, p.3; Fondation Charles Leopold Mayer and ICLEI Local Government for Sustainability, 2010, p.12). The number of partnerships between twin cities, universities and research institutes is intensifying. This form of cooperation makes easier and more effective the sharing of best practices and implementing them in different contexts.

The next paragraphs analyze some of the aspects of governance regarding urban planning and community involvement implemented in Europe that China could take into consideration to improve its path of development in the years to come.

ZONING IN CHINA AND EUROPE: MECHANISMS AND PROCESSES

The first tier of zoning in China concerns the rigid administrative division between what is town and what is not. The cities are planned and the countryside is substantially unplanned, creating enormous disparities within local areas. The City Planning Law of the People's Republic of China (1989) and the Urban Real Estate Administration Law of the People's Republic of China (1995-2007) establish that most of the rights on land-use are granted to the population only within the planned areas of the cities by the State, which is the only land owner. This means that in rural areas there is virtually no real-estate market, there are no planning standards and that in the expropriations outside the administrative urban areas (called chaiqian) the evictees are insufficiently compensated at agricultural land values even though the expropriated areas have a residential function with spontaneous settlements (Ma, 2012, p.64) with urban real estate market dynamics.

In contrast, in European countries the planning instruments cover the whole territory, often with an overlap of hierarchical plans (Bennington and Harvey in Newman and Thornley, 1996, p.22), and the urban and rural populations have the same rights against the State.

For instance, in Italy the same minimum planning standards apply to homogenous territorial zones all over the country to reserve land for public use in order to guarantee the uniform provision of satisfactory planning outcomes (Ministerial Decree 1444/68, in Mariotti, 2010, p.89). The 1968 national law fixed the minimum amount of 18m² of public land per inhabitant, devoted to public services such as schools, green areas, car parks, etc in residential areas (Ministero dei Lavori Pubblici, Ministerial Decree 1444/68, Art. 3) and regional laws have the power only to extend it, not diminish it. This shows a rigid approach to spatial planning more similar to that of China than that of the UK where the land use provisions are more flexible. However in China, as mentioned above, planning standards are only in place within the administrative boundaries of the main cities (City Planning Law of the People's Republic of China, 1989, Art. 3). There is no prescription for local authorities in the national planning laws concerning standards so they vary from place to place, only in conformity with the generic 'national and local levels of economic and technological development' (City Planning Law of the People's Republic of China, 1989, Art.13). Thus the perspective of the Chinese Law on planning standards clearly accepts that the outcomes of the planning system change depending on the local GDP performances. To confirm this we can examine the proposed planning standards for the provision of green space in newly developed eco-cities. The first is the Tianjin Eco-City, in the fastest growing area of China (Zhang, 2012), which aims to guarantee 12 m² per capita of green space (Government of Singapore, 2012), while another similar flagship project in the internal Province of Guizhou, the Landscape Bridge City - Green Duyan, the provision is only 8.66 m² per capita (Qiannan Buyi and Miao Autonomous Prefecture, 2012).

The standards system has been highly criticized in Italy in the last decades because it does not respond to the specific needs of the territories and is not flexible over time, but it has undeniably reduced territorial inequalities in terms of basic planning provisions.

Furthermore, in the last decades, in Europe, even in those countries where it is still the key tool for planning such as France, Germany, Italy, Netherlands or Spain (respectively with the *Plan Local d'Urbanisme*, *Flächennutzungsplan*, *Piano Regolatore*, *Bestemmingsplan* and *Plan General de Ordinacion*

Urbana) the practice of zoning is changing its mechanism on one hand and the decision processes on the other. Going back to the general features of the planning system of the European countries cited above, the national laws oblige the municipalities to develop binding zoning land-use plans covering the whole territory and in force for a specified time, formally without taking into account single projects (Munoz Gielen, 2010, p.88). Nevertheless the intent to bring certainty into the planning process through comprehensive land-use zoning has been hindered by the fact that many municipalities do not have the necessary resources, and therefore competence, to develop sound plans in reasonable time. Furthermore there is evidence of a trade-off, in drawing up zoning spatial plans, between simplicity and flexibility (Cullingworth, 1993, p.73). This is true because the rationale of zoning is to reduce complexity in the plans, but an overly simple plan ends up being too rigid to cope with the changing needs of society. For this reason the regulatory frameworks of zoning plans have often become really complicated, betraying the original spirit of the tool (Babcock, 1966, p.11).

To cope with these issues, in some of these countries new forms of spatial planning have been developed formally maintaining the previous zoning framework, but substantially changing it. In 2000 the Netherlands introduced a substantial change in the zoning mechanism of the municipal Bestemmingsplan (Zoning Plan) with the so-called Art.19 by allowing important exceptions. The instrument represented a too radical shift from the traditional zoning approach of the country and was formally abolished in 2008 and replaced with the new Wet Ruimtelijke Ordening (Spatial Planning Act) (Government of the Netherlands, 2013; Van Alphen, 2009, p.32), but still most of its features were maintained in Art.3 of the latter. In Italy, where Regions have largely exclusive legislative powers in the field of spatial planning (Legge Costituzionale n.3/2001, Art.117), the Legge Regionale (Regional Law) n.12/2005 of the Lombardy Region created a new form of plan, the *Piano di Governo del Territorio* (Territorial Government Plan) which is now the chief planning document for the municipalities (Art. 6), replacing the Piano Regolatore Generale. It brought about important innovations in terms of simplification of destination uses, abolition of building height limits and a great focus on strategic projects (De Carli, 2011, pp. 17-18).

In Europe there are also important cases of radical improvement in the processes underlying the first stages of the local planning activity to make it more transparent, particularly in the Southern countries which historically lagged behind in public participation (Van Den Brink, 2007, p.47). In Italy the *Legge Regionale dell'Emilia-Romagna* (Law of the Region of Emilia-Romagna) 20/2000, Art. 8, enforces the inclusion of initiatives for community participation and consultation during the formation of the planning documents. In Spain the *Comunidades Autonomas* (Autonomous Regions) have a similar degree of legislative power in spatial planning. For example, the *Ley Foral del Territorio Planeamiento y Urbanismo of Navarra* (Regional Act of Spatial Planning and Urbanism of Navarra) 35/2002 improved the participatory processes in the planning activity, particularly at the development stage (Enerìz Olaechea, 2005, p.71).

In contrast, there is no trace of community participation in the development of planning documents in the *City Planning Law of the People's Republic of China* (1989). Art. 28, the only section of the Law regulating the relation between the plan and the population, states:

'The plan for a city shall be announced by the people's government of the city after it is approved.'

(City Planning Law of the People's Republic of China, 1989, Art.28).

Since issues of participation are not contemplated in the previous articles, the Law clearly states that the plan for a city becomes public only after it is approved, not before.

EUROPE AND CHINA DEALING WITH REGIONAL INEQUALITIES AND THE URBAN-RURAL DIVIDE

China and Europe have very different approaches to deal with territorial inequalities. On one side, the government of China invests in major urban areas eight times more than the national average (Dollar, 2007, p.1) exacerbating the difference created by the market between the most and least advantaged areas. On the other in Europe the policies put on place are diametrically opposed to this. The European Union's Regional Development Fund (ERDF), Social Fund (ESF) and Cohesion Fund have as objectives the

reduction of disparities between regions, both in terms of GDP per capita and quality of life, as well as being the main instruments of economic stimulus of the Union. Only the least-favored regions have access to most of these programs, those performing below 90 percent of the Union's average in terms of GDP for the ERDF, ESF (European Commission 2012a, p.10) and Gross National Income for the Cohesion Fund (European Commission, online, 2012c). Furthermore, looking at a specific national case, in Germany no regional authority (Land) can have contributions from the State 10% higher than the national average (Dollar, 2007, p.1). Also, in Italy the amount of central government grants to the Regions in 2009 were almost double in the poorest Regions than in the richer: in Basilicata Region it was 2,236 €per-capita against 1,136 €in Lazio Region, the regional authority of Rome, the capital city (COPAFF, Ministero dell'Economia, 2012, in Centro Studi Sintesi, 2011, p.5) and the per-capita spending of the State is quite evenly distributed between the different areas of the country exception of the Lazio, where it is triple that of Umbria at the bottom of the ranking (Ragioneria Generale dello Stato, 2009, in Centro Studi Sintesi, 2011, p.14).

The European policy about territorial inequalities also tends to pump investment into rural development, trying to restrain internal migration to the cities, preserve the historical and cultural heritage of agriculture and take full advantage from the multifunctional potential of the rural world (Givord, 2000). Through the flagship programme LEADER+ of the European Union the structural funds help rural actors to implement strategies of sustainable development, particularly those focused on agriculture.

On the contrary, in China the policies concerning territorial balance put in place in recent decades identified a number of key cities in depressed areas to be transformed into centres of national investment, neglecting the potential of rural areas. The most striking examples are Chongqing, Chengdu, Changsha and Kunming, cities of central/Western China where population and GDP has grown exponentially since they were chosen as alternatives to coastal ports for strategic development (Zheng, 2011, p.27). The result of this almost exclusive investment in the urban areas has meant that the countryside has been depopulated at an impressive pace. The rural

population amounted to 81% of the total in 1979, dropping to 49% in 2010 (Bloomberg News, 2012), still far more than the 23% of population living in rural regions of Europe (Eurostat News Release, 2012, p.2) but rapidly following the same demographic trend. This phenomenon (regulated through the hukou household-registration system that prevents internal migrants to become official urban residents, highly criticized by Amnesty International, 2007, p.1) has created urban populations deprived of effective connections. This also led to the loss of working-age people and expertise in rural areas. The issue to cope with concerning territorial inequalities is that resources are limited and policy makers have to decide whether invest in efficiency (give more to those who produce more) or in equity (to equally distribute resources) (OECD, Regions Matter, 2009, in OECD, China Development Research Foundation, 2010, p.82). China definitely embraced the efficiency driven perspective, investing in the areas apparently more capable of providing economic return, while Europe invested in equity to allow less advantaged areas to catch up with the frontrunners and invest in local development so as to prevent people moving to more affluent areas in search for a job. In terms of GDP growth there is no doubt that the Chinese model has worked better than the European in the last decades, but it definitely is not sustainable on the long term.

To sum it up, the Chinese model of development widened enormously the territorial inequalities in China and an approach similar to that of the European Union would be beneficial to evenly distribute resources and opportunities, even though the GDP growth might be influenced negatively in the short term.

DIFFERENT PERSPECTIVES ON AGENDA 21

The democratic organization of Europe is of great benefit to planning practice because it strengthens the sustainability of decisions through community participation (European Commission, 2012b). However, China's non-democratic model of government, together with more than 2,000 years of feudal culture, discourages people from standing up for their rights and from participating in the decision making processes for the common good (Plummer and Taylor, 2012, p.212). Consequently, the involvement of the Chinese population in participatory processes such as *Agenda 21* (UNCED,

1992) whilst being formally promoted by the government (The People's Republic of China, 1997, p.8) was hampered by the overwhelming power of the government in the decision-making processes and by the economically driven interest of the projects undertaken (Castellucci, 2009, p.220). During the 1990s, Agenda 21 was adopted in China with the specific goal of improving the quality of government decision making at the local level (Guizhou Province Planning Commission and Guizhou Province Science and Technology Commission, 2001), but six Chinese NGOs critiqued China's progress in the Agenda 21 in relation to sustainable development (Liang, 2012). They highlighted the discrepancy between what was stated in the 2004 Program for Comprehensively Implementing Government Administration in Accordance with the Law regarding information disclosure and public involvement and its lack of implementation (Chang, in China Going Green, 2012, p.52). Therefore China, quoting the motto of Agenda 21, should really go ahead in 'thinking global, acting local', giving more powers and independence to local authorities in choosing the local policy targets, similar to what happens in most European countries. Case studies from the countries like France or Italy are more suitable for comparison with China, since in the Nordic countries the model of substantial local self-government is too structured in terms of networking between government bodies and bottom-up policies (Jensen and Richardson, 2004, p.183). The two countries recently implemented a cross-border Agenda 21 and their level of adherence to the programme at the local tiers of government is relevant and well documented, particularly around the four topics of waste, mobility and transport, energy and tourism (Pirlone et al, 2012, in Pacetti et al, 2012, p.247). In France the total number of governmental bodies involved in the programme reaches 949 (Comitè 21, 2013) 372 of which are Municipalities (Pirlone et al, 2012, in Pacetti et al, 2012, p.247). In Italy over 700 local governmental bodies are involved in the programme (Ministero dell'Ambiente, 2012, in Bettoglio, 2012, p.20).

COMMUNITY INVOLVEMENT IN LOCAL PLANNING

Analyzing the implementation of *Agenda 21*, we realize that the power of communities in China is extremely limited since they have no voice in the decision making processes. The central government authority is unquestionable

and unsupervised and it hampers the progress of civic initiatives. The number of NGOs and citizen associations in China is impressive (354,000 civil organizations in 2006; Ministry of Civil Affairs of the People's Republic of China, 2007) but their capacity to bring innovation to the system is limited because they have to be legally registered, and so are subject to the approval and supervision of the government. (Yin, 2009, p.523). Indeed, these organizations manage the community volunteering activities with the support of the national, provincial and local governmental authorities but have virtually no influence on planning decisions. Following this top-down model, the *Urban Community Development Programme* and the *Rural Community Development Programme* of the Ministry of Civil Affairs (Ministry of Civil Affairs of the People's Republic of China, 2013a and 2013b) represent the flagship programmes of the central government of China aiming to trigger community development in deprived areas, but always measuring it in terms of economic outcomes and using economic indicators.

The Internet, although censored and restricted in its use, truly represents the place where Chinese people can exercise their freedom of expression (Lee et al, 2012, p.110), but this silent movement of protesters rarely affects the planning decisions, particularly at the local scale. Nonetheless some cases contradict this common belief. By means of the internet in 2007 thousands of people spontaneously gathered in the streets of Xiamen, Fujian, to campaign against the government's decision to create a polluting chemical plant in the city until they forced the government to change its decision (Chang, 2012, in China Going Green, 2012, p.53). That was a milestone for bottom-up initiatives for local development, but still an isolated episode at that scale.

In a mature democracy, the role of the government in organizing community participation in spatial planning should be to promote and steer the debate, supporting non-governmental programmes at the local level and to empower the most deprived tiers of the population and give them 'voice' in the decision making processes which will directly affect their lives. The example of the U.K. is illuminating.

In 2011, England introduced the Localism Act, radically modifying its

planning framework in order to 'to achieve a substantial and lasting shift in power away from central government and towards local people.' (Department for Communities and Local Government, 2011, p.1). It was intended to be the last step to empower local communities, following the abolition of the Regional Development Agencies announced in 2010, with the establishment of Local Enterprise Partnerships, Neighbourhood Development Plans and Neighbourhood Development Orders in its place and the simplification of the national legislation concerning spatial planning into a single National Planning Policy Framework. However because of other government decisions to loosen development control, these actions are not having the expected impacts.

Regarding inequalities, England, Wales, Scotland and Northern Ireland between the years 2000 and 2005 mapped the deprivation of the nations in separated Indices of Multiple Deprivation using indicators that allowed the analysis of the living standards at the neighbourhood scale, using indicators concerning income, employment, health, housing, education, skills and training, living environment or geographical access to services (Tallon, 2009, p.15), and updated them regularly. This operation resulted in a fantastic tool to tackle deprivation with unprecedented geographical precision, fundamental for the creation of specific programmes of regeneration. The Welsh Government's community programme Communities First was established in 2001 to tackle social disadvantage in the 10 percent most deprived areas of the country, an eligibility based on the statistics provided by the Welsh Index of Multiple Deprivation (Welsh Government, 2012). Even though the capacity of such ambitious programme to effectively demonstrate value for the money spent on it has been questioned (National Assembly for Wales, Public Accounts Committee, 2010, p.22), not appreciating that initiatives operating towards long term and immaterial targets cannot be measured only in terms of GDP growth, the Communities First local programmes effectively empowered their communities (Adamson and Bromiley, 2008, p.4), created lasting networks with other representative and non-representative bodies and contributed for a more participated governance of the areas involved. Although the resources required for these sorts of programmes have been affected by the economic downturn, this kind of bottom-up approach to governance and community

planning makes citizens more responsible for the local development and management (OECD, 2001, p.41).

PLANNING TO PRESERVE RURAL AREAS

Finally, it is important to analyze the different planning laws protecting open land in Europe and China, which differ considerably reflecting the different weight they give to rural policies.

Simply analyzing the loss of rural land, it is easy to notice that in fast growing economies the land market, in the absence of strong development control, forces urban sprawl into the countryside and neighbouring towns tend to merge. The UK was the first industrialized country in the world, therefore the first to witness the negative effects of the encroaching form of modern urbanization on nature. It was the first country to realize the importance of preventing the merging process by creating the so-called 'Green Belt' of London in 1935 (Rowley, 26, p.113), a functional zone for natural preservation and thus construction restrictions around the existing built-up area. This is a remarkable case in a country where zoning is not the key element in the planning practice. In the UK, green belts are now common features of Local Plans, developed under the non prescriptive Planning Policy Guidance 2: Green Belts, recently substituted by the Chapter 9 of the *National Planning Policy Framework* (Smith, 2013, p.2). Even though local councils are not bound to establish green belts, these are now a sort of intangible heritage part of the English urban tradition, so most local authorities set them up.

The debate is still open about the outcomes of green belt policy, since development often circumvents the green belts triggering increased needs for mobility and dispersed communities. Nonetheless a recent study demonstrated that green belts have been really successful in achieving their goals since the land consumption rate within their boundaries is about 90% lower than outside them (Natural England and CPRE, 2010, p.28). In the rest of Europe in the last decades the green belt theory inspired a great number of local plans (Werquin et al, 2005, p.13) and the COST (Cooperation in Science and Technology)'s *Greenstructures Action* project of the European Union, which aims to promote environmental planning and management, targeting the relationship between built-up areas and their

surrounding countryside (COST 2011).

Presently, China has to cope with problems similar to those of the UK at the peak of its industrial boom, on a bigger scale. Thus China is trying to implement a number of green belt policies in the major cities, influenced by European practice. Beijing's Comprehensive Plan, approved in 1982, the most famous but unsuccessful example, introduced an Inner Greenbelt of about 300 km², but poor management and control allowed new development to sprawl inside the belt, so that in 2002 only 100 km2 remained untouched (Huang, 2004). This example proves that the implementation of green belt policies in China did not follow the same pace of the real estate market at the local scale. Acknowledging this, the national government is trying to push forward a new conception of green belt based on the artificial creation of woodlands in strategic areas characterized by heavy pollution and undergoing desertification. The most recent cases are the project proposing 1,000 km² of new plantings in the Hebei province surrounding Beijing (State Forestry Administration of China, 2013) and the 202-km long and 5 to 15km wide strip of vegetation to be planted between the two merging deserts of Badain Jaran and Tengger, requiring the eviction of about 1,000 residents (Xinhua News Agency, 2010).

As regards to saving the outstanding natural landscapes, China established over two hundred *National-level Scenic and Historic Interest Areas* and many more at the province and city levels, but they are all created and preserved because of the specific aesthetic and cultural significance attached to them, not for their intrinsic value. China lacks of legal instruments to comprehensively preserve natural locations and corridors and to protect natural features all over the country.

On the other hand European countries developed important planning instruments to guarantee the respect for entire categories of natural values, regardless of human factors. An illuminating example in this field, particularly in a country with a zoning approach similar to that of China that regulates the urban and rural planning of the country, is the Italian State Law 431/85, *Galasso* (Gazzetta Ufficiale della Repubblica Italiana, 1985), which protects the landscape and the environment in an organic way, marking the transition from the concept of landscape as aesthetic value to that of

landscape as environmental value (Salsa, 2008, p.294). Before this Law, the areas and landscapes subject to environmental protection were individually chosen as they are in China today, while after that entire morphological classes and natural categories were protected, such as mountain areas over 1,600m (in a secondary mountain range it was lowered to 1,200m), the areas around 300m from the shores of the sea and lakes and 150m from rivers, volcanoes, marshlands and archeological areas (Gazzetta Ufficiale della Repubblica Italiana, 1985).

CONCLUSIONS

The patterns of urban development of China have some important similarities with those of many European countries. Firstly, the continental European countries base their planning systems on functional zoning, similarly to that of China, making it easy to compare the features of the plans and to identify best practices working with the same approach. Secondly, the negative effects on the urban and rural environment following industrialization had already been experienced in Europe. For this reason the planning systems in Europe are trying to innovate themselves in the recent years, successfully implementing new mechanisms and processes.

The European style of city planning is fashionable in China, but mostly in terms of urban design and landscaping. Still some features of the planning system of some European countries should be considered carefully by China and taken as best practices, particularly in two areas: the application of the same planning standards all over the country and the implementation of an incremental approach to decision making processes, in order to improve public participation. As regards the first point China should follow the example of Italy by establishing a national set of binding planning standards. It should also overcome the urban-rural divide in connection with land ownership and management rights which creates enormous disparities in terms of poor planning standard provisions and insufficient individual rights in relation to planning decisions. Moreover China, instead of minimizing regional inequalities exacerbates them, transferring resources from the poorer to the wealthier areas and from rural contexts to the cities, showing a perspective on regional development opposite to that of the European Union.

Concerning public participation in the planning process, some European countries reached levels of excellence with bottom-up community-led programmes, such as the regeneration programmes implemented on the basis of the rankings of the Indices of Multiple Deprivation in the UK. On the other hand, China lags behind in transforming its rigid top-down government system into an open model of governance, as witnessed by the critiques moved by many NGOs towards the way it deals with *Agenda 21* projects.

Finally China should follow Europe in implementing more comprehensive and effective tools for safeguarding green land, particularly those surrounding the urban areas. On the one hand, it could widely adopt and enforce green belt policies, strengthening the mechanisms that failed to be successful in the first attempts like that of Beijing. On the other, it could establish laws inspired by the Italian 431/85 in order to comprehensively protect entire categories of natural environment, independently of any qualitative or cultural assessment.

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