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The (Somewhat) False Hope of Comprehensive Planning

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THE (SOMEWHAT) FALSE HOPE OF COMPREHENSIVE PLANNING

Much of the literature on smart growth treats comprehensive planning and smart growth as virtually identical, or at least as two concepts that usually go together. For example, one American Planning Association publication states: “If the community does not have a current comprehensive or master plan, it cannot achieve smart growth.”

By “smart growth” I mean the opposite of sprawl: development that accommodates pedestrians as well as cars. Most of Manhattn is smart growth, while most of Long Isand is anything but.

In my paper, I argue that comprehensive planning and smart growth are not as relevant to each other as many commentators believe- or to put it another way, that comprehensive planning is overrated. In particular, I write that municipal comprehensive plans are neither sufficient nor necessary for smart growth. (I note that I am focusing on municipal comprehensive plans that deal with urban form, not regional plans that deal with other issues). At the end of the paper, I point out that comprehensive plans do have a number of virtues- but that these virtues apply whether a community is interested in smart growth or not.

To see why planning is insufficient, I examine Jacksonville, a city in Florida. Florida is one of the most planning-oriented states in the nation; the state has required its municipalities to comply with comprehensive plans since 1985. But Florida’s cities are also among the most car-centered in the nation; according to the “Mean Streets” study that is issued every few years by the Surface Transportation Policy Project, Florida’s metro areas are consistently among the most dangerous for pedestrians. According to a 2011 study, Jacksonville is the third most dangerous city in the U.S. for pedestrians. Why hasn’t Jacksonville’s planning limited sprawl?

My answer is that rather than fighting sprawl, Jacksonville’s plan actually promotes sprawl in a variety of ways. First of all, the plan promotes low-density development. Jacksonville’s plan includes a future land use map that allocates over 138,000 acres (or about 85 percent of its residential land) to low-density housing, as opposed to about 23,000 acres to medium-density residential and only 74 acres to high-density residential. The maximum density in these low-density zones is 7 dwelling units per acre. But the plan adds that zoning regulations will create numerous areas with even lower density, so the average residential density allowed under Jacksonville’s plan is much lower. These density restrictions led to automobile-dependent sprawl, because according to most sources I have read, even seven units per acre (let alone lower levels) is not enough to support significant bus service. This is the case because if there is a bus stop on block A and only a few people live on each neighboring block, not many people are going to live within walking distance of block A- and thus, not many people are going to live within walking distance of the bus stop. Given this reality, it shouldn’t be too surprising that most Jacksonville buses stop running around 8:30 PM, and that most buses only run once every half an hour at most.

Jacksonville's plan also provides for single-use zoning: that is, the plan's land use maps separate residential and commercial use to such an extent that many people will not live within walking distance of commercial zones. For example, the map includes a six-mile-wide area devoted to housing and nothing else along the city's southern border. Obviously, most people living in this kind of house-only monoculture will not walk several miles to the nearest bus stop.

The plan also includes pro-sprawl street design rules. The plan's transportation provision requires 150-foot rights of way for major arterials (the most heavily trafficked streets).

Since travel lanes are usually 12-16 feet wide, this means that (even after allowing 20 or 30 feet for sidewalks and shrubbery) many streets are going to be eight or ten lanes wide. These wide streets are dangerous for pedestrians- first because a wide street takes more time to cross, but also because such wide streets promote fast traffic. For example, in San Jose Blvd., the eight-lane arterial near where I lived, most cars proceeded at about 45-50 mph. A pedestrian hit by a car going this fast has only about a 20 percent chance of survival.

Even supposedly smart growth-oriented comprehensive plans contain pro-sprawl rules. For example, Seattle's comprehensive plan, which purports to endorse more pedestrian-oriented development, treats it as a given that of course, new development will be forced to provide off-street parking for its users. But land used for parking can't be used for housing or commerce, so minimum parking requirements artificially reduce density and thus make society more car-dependent. In addition, because minimum parking requirements artificially increase the supply of parking, they reduce the price of parking, usually down to zero. Thus, minimum parking requirements subsidize driving; drivers get free parking but the cost of building the parking is imposed on businesses who build that parking (and perhaps to their customers generally) .

Minimum parking requirements are sometimes combined with setbacks. For example, Seattle's comp plan requires multifamily bldgs to be set back from the street. If a landowner cannot build housing or shops on the land right in front of a sidewalk, it will often put parking on that land, because parking has more value to the landowner than, say, landscaping. But parking in front of buildings very much discourages walking by creating a kind of "strip mall effect"- that is to say, it forces pedestrians to walk through a forest of parked cars. As a result, setback rules make minimum parking rules even more anti-pedestrian than they would otherwise be.

Even if municipal planning isn't sufficient to create smarter, more pedestrian-oriented growth, it could be argued that comprehensive planning is necessary for smarter growth. But it seems to me that (at least in theory) most of the policy changes needed to reverse the status quo could be achieved just as easily through municipal zoning or through statewide ordinances. Let's just look at one example: density. Ideally (from my perspective), a comprehensive plan could limit a city's ability to zone for low density. But even if that wasn't done, the city could enact a more pro-density zoning code, perhaps eliminating its lowest-density zones. Or a state could reform its zoning enabling act to prohibit discrimination based on density, except in certain environmentally sensitive areas.

Similarly, a city could deal with the parking problem by changing its zoning code to eliminate minimum parking requirements, and could change the zoning to allow some mixing of uses. For example, the SmartCode, a model zoning code, allows small corner store-size establishments in its most suburban zone.

The SmartCode also addresses street design and setback rules; it eliminates minimum setback requirements and substitutes mandatory setbacks instead, and allows streets much narrower than those allowed by most American suburbs.

Of course, just because comprehensive plans aren't necessary or sufficient for smart growth does not mean that they aren't valuable. The major advantage of comprehensive plans is that they explain the policies behind the rules, rather than just setting forth rules as most zoning codes will. So a plan that eliminated the lowest-density zones could explain that in areas with less than X units per acre, mass transit is not feasible, and that such low-density zones thus increase traffic congestion and air pollution. But this advantage of plans is not limited to smart growth: a pro-sprawl plan could explain its logic just as easily as a pro-smart growth plan could.

In this regard, a comprehensive plan is similar to a government budget. A government budget might set forth "liberal" goals of mitigating income inequality or "conservative" goals of imprisoning felons- but in either case, the existence of a budget might allow a city or state to achieve these goals more efficiently than if the jurisdiction passed individual appropriation bills without considering how much revenue the government wished to spend.

A second advantage of a comprehensive plan is that it can be used to prevent arbitrary zoning decisions: if a city has to comply with a preexisting plan, it may be less likely to make arbitrary, whimsical zoning decisions. Assuming for the sake of the argument that comprehensive plans are in fact less likely to be arbitrary than zoning ordinances, this argument applies just as much to sprawl-oriented comprehensive plans as to plans furthering smart growth. Just as a plan may reflect a consistent vision of pedestrian-friendly development, it may also reflect a consistent vision of sprawling, automobile-oriented development.

Finally, comprehensive plans can be truly comprehensive: while a zoning ordinance might be limited to land use, a comprehensive plan may also address transportation and housing issues interrelated with zoning. But again, this advantage also applies whether the plan favors smart growth or sprawl. Jacksonville's comprehensive plan contains a housing element as well as a transportation element- but its transportation element, as I have mentioned, contains street design rules that are highly anti-pedestrian.

In sum, comprehensive plans and smart growth need not go together: a comprehensive plan can promote sprawl rather than smart growth, while a community without a strong comprehensive plan may nevertheless be able to promote smart growth through zoning reform.

