

Why Are American and European Cities Different? A Legislative Approach

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A bird-eye view of American and European cities may sometimes reveal significant differences attributable to cultural differences, but hardly classifiable. Usually European cities tend to be concentrated around some central area, an equivalent of the American downtown, and, likewise the downtown, this center has a historical value and also hosts the local government. Even so, European cities differ substantially across various European countries. The expansion of every city is dictated by the legislation of the country where it is situated. For our paper we decided to look at some of the differences between the capital city of Romania, Bucharest, and the capital city of South Carolina, Columbia, and try to explain these differences based mostly on the legislation.

Cities are divided into functional zones (residential, industrial etc.). Since the legislation concerning urbanism is well developed for both Bucharest and Columbia, and consists of a large series of laws and regulations, we decided to limit our discussion to the residential zones.



Figure 1. Bucharest, Romania

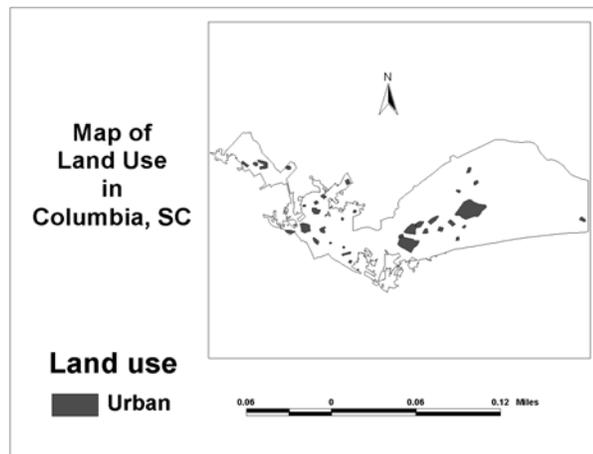


Figure 2. Columbia, South Carolina

A first difference that can be easily noticed is the shape of the city. Bucharest (Figure 1) has a more regular shape, whereas Columbia (Figure 2) presents some shrunk areas that suddenly expand. It may be argued that Bucharest is developed concentrically, whereas Columbia is developed in a tentaculate fashion. The difference may be explained by the definitions of the city limits. In Columbia, “the term *in the city* means and includes any territory within the corporate limits of the City of Columbia, South Carolina, and the police jurisdiction thereof, and any other territory over which regulatory power has been conferred on the city by general or special act, except as otherwise specified” [2]. This definition involves implicitly that the city is collecting the taxes for the areas situated *in the city*. Bucharest lies on a *metropolitan territory*, defined as “surface around the large urban areas, delimited through a series of studies, influenced by these in the following: transportation, socio-economic and cultural aspects, and local government. This area may exceed the city and county limits” [3]. This definition is usually common to most European cities, where the city limits are defined based on the common cultural and historical aspects rather than based on taxation.

Another possible explanation for the observed differences is that Bucharest grew as the rings within a section through a log, whereas Columbia developed by annexing the surrounding cities.

This discussion involves a second one, related to the definition of urban areas. In the United States, particularly in Columbia, the general definition of the US Census Bureau requires such development to be at a density of 1,000 persons per square mile or more [4]. In Bucharest, whatever lies within the city limits is considered urban (various urban categories, such as residential, industrial, or commercial are represented by different shades of gray in Figure 1). Usually, urbanized areas are defined in Europe based on “a minimum number of people (1500 in Ireland, 2000 in France), and on the fact that the majority of the labor force is employed in non-agricultural occupations” [5]. Therefore, urbanization is defined in Europe based on developmental characteristics rather than on the density of the inhabiting population.

It is also necessary to underline several aspects related to some demographic and historical data to understand the differences. Europe and America differ in what may be called “culture of living” [1], and the easiest to notice difference is the American need for privacy; as a result, European cities tend to present higher population densities (Table 1).

| | Bucharest | Greater Columbia |
|---------------------------------|--------------------|-------------------------|
| First historical mention | 1459 | 1786 |
| Population (1998) | 2,021,000 | 509,935 |
| Area | 88.1 sq. mi. | 117.1 sq. mi. |
| Density | 22,940 per sq. mi. | 4,355 per sq. mi. |

In Romania, the growth of a city is controlled by the national laws no. 350, “Law of Urban Planning and Urbanism”, and no. 50, “Law of the Authorization of Constructions and Specifications for Building”. The first one requires any constructor to obtain a permit called “Certificate of Urbanism” and an “Authorization of Construction”, based on a plan made by an architect. This law follows a decision of the national government referred as “General Regulation of Urbanism” [6], specifying the following: dwellings may be built only within the residential areas falling within the surface designed for building, called intravilan, meaning “within the city” [8], at the following distances: 9.84 ft. (3 m.) minimum setback from the street, 6.56 ft. (2 m.) minimum setback from the next building; the side with windows or balconies must be placed 6.23 ft. (1.90 m.) minimum setback from the property line; the distance between buildings is computed as a function of height based on a formula, i.e. two 14-floor buildings cannot be placed at a distance of 10 ft. or less, as a measure of protection in respects such as exposure to light, protection from pollution and noise, and security and health requirements. Residential buildings cannot be placed close to sources of pollution, noise, and vibrations; the land where residential buildings are placed cannot be occupied more than 20-40%, depending on the type of dwelling to be built; bedrooms should not face North; parking spaces for inhabitants, trash collection, and emergency situations, as well as green spaces should be allowed around the dwellings. It is also necessary to build health, education, administration, financial, and commercial facilities within the residential zones, without altering the type of zoning.

Urbanism in Columbia is controlled mostly by local regulations. South Carolina Local Government Comprehensive Planning Enabling Act of 1994 [7] indicates that a zoning permit is required to erect, move, add or structurally alter any building or other structure (Sec. 17-83), similar to the Romanian “Authorization of Construction”. The rules applying to residential areas relate to the minimum lot area (5,000-15,000 sq. ft.), minimum lot perimeter (50-150 ft.), and the footage for any additional attached dwelling unit (2,500-3,600 sq. ft.). Permitted uses are: single family residences, townhouses, and high-rise apartments. A special section (17-301) deals with

cluster housing, permitted only in residential districts. Cluster housing requires two parking spaces per dwelling unit, minimum 25 ft. setback from the center of internal street, and minimum 10 ft. minimum setback from exterior property line of development. Minimum spacing between buildings varies between 6-10 ft. (side to side) to 100 ft. (rear to rear), depending on the type of residential area. The percentage of land in open space to total land area lies between 10-30%. In the United States, functional zones may be exclusive (i.e., only residential).

It is easily noticeable that the legislation does not vary substantially in terms of what is required, but varies in the minimum setback values, governing the position of a dwelling related to the neighboring one, and, therefore, the expansion of a neighborhood or even of a city, vary substantially, underlining the American need for space and privacy and explaining somewhat why European cities exhibit an apparently controlled expansion and higher densities, and American cities are diffuse and- excepting large centers as New York, NY or Los Angeles, CA- have lower densities [1].

Even if a comparison between two cities lying on two different continents is almost impossible, this study may provide some explanations for the differences between European and American cities, particularly Bucharest, Romania, and Columbia, South Carolina.

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