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# The Unfulfilled Promise of Activity Location Management within the Zoning Framework of Tehran's Strategic–Structural Comprehensive Plan

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**Abstract**

With the arrival of the horizon year of Tehran's Strategic–Structural (Comprehensive) Plan, evaluating its achievements, implementation outcomes, and structural shortcomings has become a central concern for planners, urban managers, and researchers. Existing evaluation studies and monitoring reports indicate that a substantial proportion of the plan's objectives have not been achieved and that significant structural challenges have emerged during its implementation. One of the most persistent criticisms concerns the deferral of numerous implementation requirements and regulatory instruments to the post-adoption stage of the plan. Nearly two decades after its approval, many of these obligations remain unresolved. Among the most significant unfulfilled requirements is the determination of permitted activities for all land-use subzones within Tehran's Detailed Plan. This is particularly important because the principal distinction between Tehran's latest comprehensive plan and its predecessors was the transition from a conventional land-use approach to a zoning-based planning framework. The effectiveness of such a framework depends on the specification of permitted activities at the subzone level as a primary instrument for guiding and regulating urban development.

This paper critically examines the institutional, legal, and implementation challenges associated with the regulation of activity locations in Tehran. It argues that the failure to operationalize one of the fundamental instruments of the zoning system reflects a broader disconnect between strategic planning objectives and the mechanisms required for their implementation. The study highlights the need to reassess existing realities and to reform institutional arrangements and regulatory frameworks before undertaking any further revision of Tehran's urban planning system.

Keywords: Zoning System; Permitted Activities; Activity Location Management; Strategic–Structural Planning; Tehran Comprehensive Plan.

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# Why did one of the most fundamental instruments required for implementing the zoning system an instrument that was legally required to be completed within two years following approval of the Detailed Plan remain at the study stage and never progress to formal adoption and implementation?

## Extended Abstract

The completion of the planning horizon of Tehran's Strategic–Structural Comprehensive Plan has renewed interest in evaluating its implementation performance, institutional outcomes, and structural limitations. Despite its framing as a shift from conventional land-use planning to a zoning-based regulatory system, monitoring studies indicate that many of its objectives remain unrealized. A persistent critique concerns the deferral of key implementation instruments to post-adoption stages, resulting in a long-standing gap between strategic intentions and operational practice.

A core unresolved issue is the absence of a fully operational system for defining permitted activities within land-use subzones, which is essential for translating zoning principles into enforceable spatial regulation. While zoning is identified as the main tool for managing urban development, its effectiveness depends on the existence of clear, legally binding, and administratively implementable activity classifications. Without such a framework, zoning remains largely declarative and weak in regulatory capacity.

Using a critical institutional approach and qualitative analysis of planning documents, this study examines the alignment between Tehran's approved zoning structure and the institutional mechanisms responsible for activity location management. The findings reveal a structural disconnect between policy design and implementation capacity, rooted in the postponement of essential regulatory instruments to post-approval phases of planning.

This disconnect has led to increased ambiguity in regulatory interpretation, expanded discretionary decision-making, and a gradual shift from rule-based governance toward case-by-case administrative practices. Consequently, inconsistencies have emerged between designated land uses, issued building permits, and actual patterns of urban activity, producing legal uncertainty and weakening the coherence of urban management.

The study concludes that improving the effectiveness of zoning in Tehran requires not only spatial restructuring but also the institutionalization of implementation tools, clarification of legal frameworks for activity regulation, and stronger alignment between planning design and administrative capacity. Without addressing these deficiencies, zoning will continue to function as a partially operational framework with limited capacity to guide urban transformation.

Zoning in the absence of clear regulations for activity location becomes a broad and weakly operational framework. This study examines the coherence between Tehran's zoning system and the mechanisms governing the regulation of urban activities. Increasing divergence between these two elements constrains key planning goals such as environmental quality improvement, reduction of functional incompatibilities, and development aligned with environmental capacities. The observed disconnect reflects a structural mismatch between strategic objectives and implementation tools, arising from the postponement of essential regulatory instruments to the post-adoption phase of the planning process.

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