



Tehran Privacy - Legal Principles, Problems and Reasons for Failure

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ABSTRACT

Tehran as the capital of the Islamic Republic of Iran has about 8.7 million inhabitants, according to the census of 2016 and this is equivalent to 10% of the total population of the country¹. Accelerated and uncontrolled growth of concentration of population, wealth, and activity in the city of Tehran has led to several problems such as loss of quality of life, air pollution, water scarcity, waste and waste disposal problems, traffic in the communication network, constrained construction in Tehran and surrounding cities, as well as disturbing the regional balance of the whole country regarding the distribution of the urban population. The lack of a plan for land reclamation and the lack of decentralization policies are among the main causes of these problems.

In 1970, Tehran's first master plan was approved². The plan had approved boundaries and privacy. Eventually, in 2007, the second comprehensive plan was approved with a 27-year delay. According to current laws in Iran, each city should have an independent map of the boundary and privacy³. "City boundary" is an area including the built-in texture plus the land designated for the development of the future horizon⁴. "City privacy" is also a territory around the city boundary in three to five times more than the city boundary⁵. This privacy is for the development of the city in the following decades and the deployment of specific activities. (The figure No 2 shows the city boundary of Tehran which Approved in 1970).

Unfortunately, in the past four decades, Tehran has never had a logical and legal privacy map that has been approved by all. Not having a suitable privacy map has practically, directly, and indirectly caused management problems and has a very negative effect on urban management, the environment, urban economics, land use, and so on. In this article, the legal principles, analysis of the problems, and perspectives in the field of the privacy of Tehran, and finally the proposed strategy for addressing 40 years of privacy have been discussed.

Keywords: City privacy, City boundary, Political boundary, District, City, Interference, Comprehensive plan

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¹ According to the Population and Housing Census of 2016, Tehran province has 43 independent cities. The total population of the province is 13 million and 267 thousand people, 12 million and 452 thousand people (93.85%) are urban and the rest are rural. From among the total urban population, 8 million and 693 thousand people live in Tehran and the rest (3,758 thousand) in 42 other provinces. Among the total 3 million and 758 thousand people, 2.5 million people live in 25 cities in Tehran, and in this article they are referred to as 25 cities or 25 surrounding.

² In addition, in 1992, the "Tehran Reconstruction Plan" was prepared. That was not a comprehensive plan, and it was pursuing the goal of organizing. This plan was not implemented. (ATEC Consulting Engineers, 1992)

³ "Privacy" word roots in Arabic that has entered the Persian language. Privacy is a legal term that implies the notion of prohibition and restriction. Therefore, the privacy of the city is a land that even urban development always faces with strict prohibitions and considerations.

⁴ This course is in Iran for a comprehensive 10-year plan. And only in certain cases where the previous approved city boundary is too large, the life of the comprehensive plan can be 15 years.

⁵ The proportional area of the area is 3 to 5 times the High Authority for Urbanism and Architecture of Iran in paragraph 7 of the resolution dated 6-8-2007 and the subsequent amendment to the resolution dated 27-7-2006. (Vatankhah and Aghvami Moghaddam, 2011) But this rule has not been well respected by the High Council for all cities. As an example, Andisheh, Golestan and Kahrizak are not eligible, and the area of the city's privacy is less than twice the boundary of the city. Of course, it should be noted that sometimes due to the close proximity of cities to each other and the small size of the land, or even the small size of the division of the political division and the city, there is no choice but to disregard that proportion. In the case of Tehran, this area has been approved by the Supreme Council 10 times more than the boundary

1. INTRODUCTION

By January 18th, 2006, all Iranian cities should have some types of maps including city privacy and city boundary. "The service boundary" was the area where the municipality was legally authorized to provide a variety of services (garbage collection, transportation system, and other services according to the municipal law). "The legal boundary" included an area of services, plus land and property legally located in the city. But for some reason, the municipality was not allowed to provide services, including construction, drinking water, electricity, street lighting, and so on. "Service boundary" of the city was determined at the time of preparing the urban development plan⁶. "The legal boundary" also according to Note 1 of Article 4 of the Law on Definitions and Rules of State Divisions - approved on 6-7-1983 was determined with the proposal of the City Council and the approval of the two ministers of "country" and the Minister of "Housing and Urbanism"⁷. (Mansour, 2001)

Each city also had two privacy maps. "Map of the Article 99 of the Municipal Law", and a plan that was implemented in the paragraph (1) of Article number (99) of the Municipality Law (Mansour, 2001). The plan was proposed by the municipality and publicly approved by the Minister of the Interior after approval by the city council. Besides, the "Map of city privacy" was also proposed and approved at the time of the preparation of the Urban Development Plan. This map was the result of urban development studies (comprehensive plan), and the socio-economic interaction of the city with the periphery, namely, the city privacy. This map has study aspects more than administrative.

As the result, there was frequency of boundary map and city privacy and, there was some kind of interference and dichotomy in urban plans and management. The Ministry of the Interior often laid down a map of Article (99) and a map of the legal boundary, and the Ministry of Roads and Urban Areas often accepted the protection of privacy and the services boundary. Therefore, in the form of a new law by the Islamic Consultative Assembly, the boundaries and privacy were consolidated and approved by the "Law on the Definitions of the city boundary and privacy", approved on 18-01-2006, after towns only had a map of the "city boundary" and a "city privacy". Both are proposed, approved, and implemented for the development of the Urban Development Plan (Mansour, 2007).

According to the current laws, Tehran as the capital of Iran is not exempt from this law and should have proper privacy. But there are problems in this regard.

2. METHODS

Problem Statement and Legal Principles

As noted, according to the laws of Iran, each city must have a "boundary" map and a "privacy map". (Mansour, 2007). These boundaries are lines for urban management that are set up in the legal authorities approving urban development plans and comprehensive plans, and must necessarily follow the political

boundaries. According to current laws in Iran, urban management of the city privacy and boundaries is the responsibility of the city municipality.

Political boundaries in Iran are determined and approved by the government, and from smaller to larger including village, district, county, and province. The boundaries and privacy of the city are determined in the master plan and are approved by the "Urbanism and Architecture Council of Iran"⁸ or its corresponding Provincial Organization⁹. (Fallah, Mohammadloo, 2018) In any case, the boundaries of the city shall not exceed the boundaries of the district, the city, and the province. Political boundaries have priority over municipal boundaries. In the event of a conflict between the boundaries of urban management with political boundaries (except for the rural border), management interfaces between urban management and other ministries are created. Because of the extent of the performance of the provincial departments, such as governors, the judiciary, civil registration, registration of documents and real estates, cultural heritage and tourism, environment, agriculture, mining and commerce, endowment and charity, roads and urbanization, urban and urban councils, etc. are all based on the city's political divisions and not urban management divisions, hence, it has been strongly emphasized in current laws of Iran that the boundaries and privacy of a city should not interfere with the boundaries and adjacent neighborhoods. Furthermore, the boundaries and privacy of the city should not exceed the boundaries of the district, the city, and the province in any circumstance, and any action is considered as a "crime".

In Article 2 of the Law, the definitions and rules of division of the state-approved on 6-7-1983 state: "The city is a location with the legal limits that are located in the geographical area ..." (Mansour, 2007). In addition, Article (4) of the Law on Definitions and Rules of State Divisions states: "It is necessary to observe the boundary of all divisions for all administrative units (administrative & judicial) and the institutions of the Islamic Revolution of Iran." and again in Article 22 of the Code of Conduct of the Law on Definitions and Rules of State Divisions - endorsed on 14-10-1984, the text of Article (14) above is repeated identically.

Article 2 of the Law defines the boundary and privacy of the city, dated 18-1-2006, and states that: "The city's privacy shall

⁸ "The Urbanism and Architecture Council of Iran" is the highest level and specialized authority in decision making and decision making in the field of urban planning and architecture of Iran. The Minister of Roads and Urban Development and the Deputy Minister are respectively the Chairman and Secretary General of the Supreme Council, and from among the other 10 ministries. The council is based in the Ministry of Roads and Urban Development and is considered the third pillar of the Iranian Urban Planning System after the Islamic Consultative Assembly and the Council of Ministers (the Board of Governors). This article is used briefly of "Supreme Council". Master Plans must first be approved by "The Islamic city Council" and in final investigated and Approved by the "The Urbanism and Architecture Council of Iran". (Fallah Mohammadloo, 2018)

⁹ "The Provincial Planning and Development Council is the highest provincial level and is equivalent to the Supreme Council. Urban development plans, including the comprehensive plan, will be submitted to the Supreme Council after approval by the Council for final approval. Of course, recently, in Article 6 (1) of the Charter (31), the permanent rules of the program law, approved on 29.01.2017 have been mandated by the Planning and Development Council of the province to adopt comprehensive plans with cities with a population of less than 50,000. According to the Decree of The Council of Ministers on 18.01.2012, for the cities with a population of less than 25,000, the "urban guide plan" is prepared. These plans are more comprehensive and are eventually approved by the Planning and Development Council. (Guardian Council of the Constitution, 2017)

⁶ For example, a comprehensive urban plan.

⁷ The ministry's title has changed in the Ministry of Roads and Urban Planning in 2011.

not violate the boundaries of the divisions of the county and the relevant section." (Mansour, 2007) Article (12) of the said law states that: "Any violation of the provisions of this law as a violation of public law is considered a crime and the perpetrators, in addition to the number of the imposition and elimination of the offenses, are sentenced to the corresponding penalty under the Islamic Penal Code." (Mansour, 2007)

At the same time as the comprehensive map of privacy was prepared for Tehran in 1971. The area of this privacy map was approximate twice the area of the city of Tehran and, of course, interfered with neighboring cities. However, at that time, the interference was not tangible and the severe problems were not disputed. Problems caused by interference were generally contested by the surrounding towns after 1981. The next comprehensive plan was not only not solved but led to more complexities.

The subject of this article is that due to the mistake of the "Iranian Council for Urbanism and Architecture" in 2007, the Tehran area has a significant interference with the two neighboring counties, and the city privacy also interferes with the seven surrounding counties and 25 surrounding cities. The existence of these interactions has caused a lot of problems for the city of Tehran and especially the 25 peripheral cities. Tehran is severely damaged by this disaster and imposes pressure on the population of 2.5 million people in the 25 surrounding cities. Environmental degradation, unauthorized construction, degradation of agricultural land and gardens are the disadvantages. It also imposes the establishment of environmental pollutants (such as cemetery, landfill, rubbish, refinery, prisons, industrial towns, large warehouses, and air pollution caverns, etc.) by Tehran's Urban Management in 25 cities that are not only incompatible with the principles of land administration and sustainable development but also injustice and in some way contrary to the civil and social rights of citizens.

Main Objectives of the Paper

The main objectives of this paper are as follows:

- A. Explaining the problems caused by Tehran's lack of compliance with the rules and regulations
- B. Introduction of suggested solutions by different authorities to solve the problem
- C. The suggested solution for this article (the author) to solve the problem¹⁰.

The Challenges of the Interference of Tehran Privacy and Boundary with the County Divisions and Surrounding Cities

Some of the basic challenges regarding the interference of Tehran's boundary and privacy with neighboring cities are the following:

1) Interference of the City Boundary of Tehran with the Districts of the Neighboring Cities:

Tehran has an area of 600 square kilometers. This area extends not only beyond the central part but also from the north with

¹⁰ It needs to be explained that I have already suggested an idea to the Tehran governorate in 2017 to solve this problem. But it has not yet reached the operational stage and is being discussed by various authorities. The idea is described in the following pages.

the counties of Shemiranat, which has an area of 20 square kilometers. It is part of the city of Tehran, known as Tajrish, in the counties of Shemiranat. It also has a total area of 23 square kilometers with the counties of Rey on the south side¹¹. In other words, Tehran's municipality is not in a position to interfere with the decision-making process for these two areas. All decisions must be approved by the two Ray and Shemiranat governors after approval by the municipality and the Islamic Council of Tehran, in terms of communication and the area of conflict. A part of the administrative affairs of the citizens of Tehran is carried out by the governorate of Shemiranat and the counties of Ray and apart by the Tehran governorate as well as by the Ray governorate. This situation is unpleasant for the Iranian capital with an estimated 8.7 million people. (The figure No 1: shows the both city boundary and city privacy of Tehran that Approved in 2007. And The figure No.3: shows the Interference of the City Boundary of Tehran with the Districts of the Neighboring Cities and Counties)

2) The Interference of the City Privacy of Tehran with the Divisions of the Neighboring Counties:

According to paragraph 4 of the comprehensive Plan of Tehran - approved by the Supreme Council on Urban Planning and Architecture of Iran - 26-11-2007, Tehran has an approved and conditional map of 5918 square kilometers. In addition to the central part of the entire city of Tehran, this area also interferes with the number of seven surrounding urban areas (Ray, Islamshahr, Quds, Shahriar, Shemiranat, Baharestan, Robat Karim) In other words, the privacy of Tehran is designed in a manner incompatible with the above-mentioned law and conflicts with the respective governorates in a managerial manner. The bill contains a note that stipulates the operation of the bill subject to conditions that have not yet been operational: the terms are: a) the correction of the boundaries of the division of the state by the ministry of the interior and the government; or b) amending the law in such a way as that interfering to Tehran privacy and surrounding countries is legal (Parsboom Consulting Engineering, 2007). (The figure No.1 shows the Interference of the City Privacy of Tehran with the Districts of the Neighboring Cities and Counties) (Parsboom Consulting Engineering, 2007)

3) The Interference of the City Privacy of Tehran with the Boundary and Privacy of the 25 Surrounding Cities:

There are 25 independent cities within the Tehran privacy and surrounding countries¹². These cities have less political and economic significance than Tehran. But according to legal and

¹¹ This interference is evident in other cities between Tehran and the border of the neighboring city is (Pakdasht at 12 km²), (Islamshahr at 13 km²) and (Karaj in Alborz province at 4.5 sq. Km).

¹² These cities are: Lavasan, Oshan - Fasham - Meigon and Shemshak of Shemiranat county. Ahmad Abad Mostofi, Islamshahr and Chahardangeh from Islamshahr county. Shahriar, Shahed Shahr, Vahidieh, Saba Shahr, Ferdowsieh, Andishe New Town, Baghestan of Shahryar County. Baqer shahr, Kahrizak, Qiamdasht and Hassan Abad from Ray county. Quds of the Quds county. New Town of Parand, Nasir Abad City and Robat Karim from Robat Karim county. Nasim Shahr, Salehieh and Golestan from the county of Baharestan. The New town of Pardis and Bomahen from the county of Pardis. It should be noted that the cities of Ahmadabad Mostofi, Shemshak, and Qayamdasht have been recognized by the Council of Ministers as independent cities over the past seven years, and in 2007, when the privacy map of Tehran was approved, these three cities were as a village (25 cities' total population was about 2536000).

administrative matters, they have a municipality and an independent Islamic council. Also, everyone has a municipality completely separate from the city of Tehran and has the same independence as the city of Tehran. These cities are fully recognized by the City Council as an independent city, and for all of them, the mayors have been elected by the City Council. The Islamic councils of each city are also determined by the people and through the elections. (Please see both figures No 1 and No 3)

After the approval of the city privacy of Tehran by the Supreme Council and Architecture of Iran in 2007, it began to prepare and approve a map of the privacy and boundary for surrounding cities. In particular, from 2008 to 2011, separate privacy and boundary has been approved and submitted to the governorate for their implementation. This Council's action shows that the Supreme Council itself has not believed in the privacy of Tehran. Because if it approved and accepted the privacy of the city, it did not take 23 intercepted privacy maps¹³. The most important thing is that the text of Tehran city privacy is conditional on operationalization, but the permits of 25 peripheral cities are not subject to conditional approval, and at the same time the approval and notification by the municipalities are exactly 100% of the time.

4) Interference between the Boundary and the Privacy of Aftab City (Aftab Religious-Cultural Complex) with Tehran and Surrounding Cities and Towns

In the province of Tehran, there is a site or a different collection called the "Aftab City". The exact title is "Aftab Cultural-Religious Complex"¹⁴. The tomb of Ayatollah Khomeini (Imam Khomeini), the founder of the Islamic Revolution, is at the heart of the city. The city of Aftab, its boundary map and privacy when Ayatollah Khomeini died, was approved by the Supreme Council for Urban Development and Architecture of Iran on 14-12-2002. The boundary of Aftab city is about 10,000 hectares and its area is about 22,000 hectares and is interfered with 5 districts and 9 surrounding cities¹⁵.

Of course, since the city and the cultural complex of Aftab do not have a municipality and an Islamic council and is governed by a board of trustees, this is not an independent city and is not subject to the municipal law in Iran. Therefore, the interference of its boundary and privacy with its neighboring cities and neighborhoods will not be severely affected by the problems of the 25 cities. The problems caused by interference are negligible. In other words, its interference with the surrounding cities is not considered a crime, but it leads to conflicts and management problems. (Zaveh Consulting Engineering, 2002)

5) The Interference of Privacy of other Cities with each other and with Political Boundaries

In addition to the interference of the privacy map of Tehran with the surrounding cities, the cities inside the privacy are also interspersed. As an example, Islamshahr's privacy interferes with the quadruple division. The city privacy of Qods is interfering with Alborz province. Additionally, 40% of the approved boundaries of the city of Andisheh is located inside the Qods city. As a result of this interference, a map of land in this area is interrupted simultaneously by several managers. As an example, a plot of land in the privacy under the interference of Islamshahr simultaneously is under the management of the Tehran municipality, the municipality of Islamshahr, and Chahardangeh district.

In total, the number of interactions between the political boundaries and area in the province of Tehran (regardless of the city of Tehran) is about 24 cases¹⁶.

3. RESULTS

A picture of Tehran's future

As stated, the Supreme Council for Urbanism and Architecture of Iran, in the Tehran Comprehensive Plan, (approved in 2007), stipulates two conditions for the operation of Tehran's privacy, which, in the opinion of the Supreme Council, will solve the problem of privacy alone. The following paragraphs address the limitations and consequences of the operation of any proposed of the Supreme Council:

Option 1: Modification of County divisions to 8 Counties. If the ministry of the interior and the government decide on a national border reform, seven counties in full or parts of them should be merged with the city of Tehran. In other words, the independent identity of seven counties should be ignored. And the number of 25 surrounding cities are considered as districts 23 to 47 of the Tehran municipality. In this case, the surrounding cities will not be an independent city, and their Islamic council should be dissolved. Of course, this action by the government is never operational. Because in this case, about 16% of the population of Iran will be managed by the mayor of Tehran, which is not desirable, and in principle, the city administration with this population is not practicable under the Municipal Law¹⁷ of 1955. This policy tends to "concentration-orientation", and is not consistent with contemporary urban planning and urban management in the world that emphasizes sustainable development and decentralization.

¹³ The city of Ahmadabad Mostofi dosnot have any approved privacy map.

¹⁴ Applying the "City" to this site is due to its remarkable size and function. Its site plan is like the upper half of the sun, and it has a variety of recreational, tourist, educational, academic, sporting, agricultural, residential and even health resorts, crafts, workshops and warehouses. And will function entirely as a new city with a predominantly "religious-cultural" role.

¹⁵ The counties that interfere with the Aftab complex include Tehran, Robat Karim, Ray, Islamshahr and Baharestan. And the districts that interfere with the Aftab include Kahrizak, Baqer Shahr, Tehran, Chahardangeh, Islamshahr, Saleh Abad, Nasir Shahr, Robat Karim and Hassan Abad.

¹⁶ Some of the interferences are: the privacy of Islamshahr with the Chardangeh section, the privacy of Islamshahr with the Ahmad Abad section, the privacy of Islamshahr with the privacy of Tehran. Pishva boundary and Gharchak country. Privacy of Quds city with Alborz Province. The boundary of Andisheh city with the city of Qods. Privacy of Roudehen with the boundaries of Ab-e-Ali, interference of the area and privacy of Saleh Abad to Islamshahr city, the interference of the Golestan boundary, as well as the Nasim Shahr boundary with Islamshahr countries, and so on.

¹⁷ The municipal law was approved in 1955. This law is the same for all cities and must be responsible for the city of Tehran, the cities of the provincial centers, the densely populated cities, and even cities with a very small population (e.g., 1,000 people). Although in recent years, in some cases, it has been amended but it does not meet the needs of today's urban community in Iran.

Option 2: Amendments to the Law on the Lawfulness of the Violation of the Privacy of the City of Tehran to the District and the Surrounding City: in the field of amending the law with the aim of the lawfulness of the violation of the privacy of Tehran to other cities, so far, no proposal has been drafted and the bill has been drafted and submitted to the parliament and the Islamic Council has not submitted and its details are unclear. It is unclear whether in the reform of the law will the independence of the surrounding municipalities be taken into account.

4. DISCUSSION

It should be included in the process of amending the law, avoiding the continuation of management problems in the materials and the remarks, and other relevant laws, including Articles number 100 and number 99, "The Law of Municipalities", (approved and revised in 1955 & 1994") as well as the "Law of Islamic Councils and its subsequent amendments" also corrected. Because the authorities for dealing with construction violations must also be identified. What is obvious is that reforming several laws should be on the agenda. In this case, the 5918-kilometer privacy will not be specific to Tehran, and you cannot call it the privacy of Tehran; but, it is also the common privacy of Tehran and 25 cities.

Both proposals of the Supreme Council are very fictitious, crude, and far from futurism and attention to political, economic, and social issues. The surrounding counties have 7 governorates and 25 municipalities and 25 independent Islamic councils. The establishment of these governorates and municipalities in urban and rural management is very effective, and it is not possible to correct and eliminate cities, and in particular, to eliminate the independence of 25 cities. For the second option in the Tehran Comprehensive Plan document, no guidance lines have been put forward by the legislator.

One of the legislative powers and main duties of the Supreme Council is the drafting of the bill and submission to the legislative authorities, namely, amending the law and resolving the problems of the city's privacy are inherent duties of the Supreme Council, but by the end of 14 years (from 2007 to 2021), the law has remained silent and has not even followed up on the fulfillment of the terms!!!

5. CONCLUSION:

As a conclusion and in my opinion, the following principles and the following theoretical framework should be taken into consideration to make any proposal to Tehran's privacy¹⁸.

- Tehran is not a normal city. It is a specific and urban phenomenon with international and national performance. Tehran is a Metropolis. This city has a reciprocal relationship with its surrounding cities. Therefore, any decision for Tehran would be unsuccessful regardless of the location and functioning of the peripheral cities. It should adopt a territorial approach and strengthen the distribution of fair duties between Tehran and other cities.

¹⁸ All of the abovementioned cases apply to the city of Tehran and its interference with neighboring counties.

- It should be noted that merely revising the current laws to the extent of amending and adding this note that: "Tehran's privacy is an exception and can go beyond the boundaries of the district and the city", or sentences like it will never eliminate the problems of Tehran, the privacy of Tehran and the surrounding cities. Because privacy is a very broad area of management. Maintaining it requires the participation of all units and a significant cost. It is also a major source of income for urban management because of the activities it is engaged in. This complexity of management in Tehran's privacy is far more severe due to the establishment of 8 governorates and 25 municipalities and city council councils. Tehran's privacy is not merely a simple, boundary map showing the scope of municipal governance. It also determines the financial, economic, social, and physical relations of the city of Tehran with the surrounding.
- The surrounding towns of the 25 cities and even other cities of the province have been formed because of the lack of a land plot in the last 50 years. They had very rapid population growth, and their formation and economics were influenced by the city of Tehran. Indeed, most of their population is immigrants from all over the country to Tehran, because of the impossibility of entering and residing in Tehran. These cities also have a dormitory for Tehran.
- The city of Tehran must have an appropriate and substantial area. And the large and crowded Tehran and the placement of 25 cities around it should not be a barrier to legal privacy. Therefore, this thinking is two-sided and should not impose Tehran's limitations on other cities and the environment.
- Citizens of surrounding cities like citizens of Tehran have civil rights. They need a favorable environment for life. Therefore, the environment of surrounding cities should not be used as a backyard for Tehran. At present, the center is responsible for creating various types of contaminants, such as prisons, construction waste disposal centers, waste disposal centers, refineries, cemetery, international airports, industrial towns, warehouses, wharf, main communication networks, and city entrance and exit, workshops and the industries in which the economy of Tehran depends on them are all located outside Tehran and in the vicinity of the 25 cities, and even this process of disturbing activities from Tehran to the outside is also being strengthened. Tehran, as the capital, does not even have a great recreational center. Most citizens of Tehran are dependent on recreational activities and leisure time in surrounding cities, especially in the west and north (Lavasan, Fasham & Shemshak)¹⁹. In contrast to the significant share of the central offices of the entire country, engineers, doctors, specialist activities, and luxury and fantasy of the whole country in Tehran are focused. This division of duties is unfair and should be amended and mutually reinforced²⁰.

¹⁹ These cities are mountainous and well-maintained. Most gardens, the green slopes are widespread in these cities. And is the best ski resort of Shemshak county.

²⁰ Of course, it's not always possible to deploy the above-mentioned applications inside Tehran, and it's sometimes the only option to locate them outside the city. Some urban planners also emphasize that in some cases, the

- Compared to other cities, Tehran is expensive and costly for both citizens and urban management. The wealth, property, and property prices of the citizens of Tehran, as well as the citizens of other surrounding areas, are constantly increasing as a result of the smallest economic development. What is clear is that this growth in prices and assets is not the result of the efforts of every single citizen of Tehran! It is the result of the Iranian economy, especially the concentration in Tehran, and the hardships that citizens of other cities are suffering. Moreover, the citizens of Tehran are unhappy and, with minimal awareness, entered into an unwritten agreement, living in a polluted and noisy city. Their daily hours spent in traffic between home and work and in contrast to the significant annual growth in their property prices!!!
- It should be accepted that the city of Tehran cannot be determined in terms of its economic and environmental and functional characteristics. Its economy and its life, for whatever reason, are environmentally responsible for thousands of square kilometers of the surrounding. Therefore, some of the revenues and benefits for Tehran's urban management should be distributed and spent in surrounding cities. Also, the privacy of Tehran as the "privacy of Tehran and the surrounding cities"²¹ is again determined. The current rules for the amendment and management of privacy shall be assigned to a board of directors consisting of all mayor and governors, the governorate, and the municipality of Tehran. Even some agencies such as roads and urban planning, as well as Jihad Keshavarzi Organizations (Ministry of Agriculture), are also part of the administrative structure. To operate, invest, and manage the privacy of Tehran and the 26 cities of the administrative-financial system, it should be approved by law in the Islamic Consultative Assembly. It should be noted that for the main management of privacy, the council and the structure similar to the proposed structure in the law on the supervision of the expansion of the city of Tehran - approved on 8-8-1973 can be proposed for the management of the privacy of Tehran.
- First of all, these actions are necessary to repeal the controversial resolutions of the Supreme Council on the privacy of Tehran and other cities.

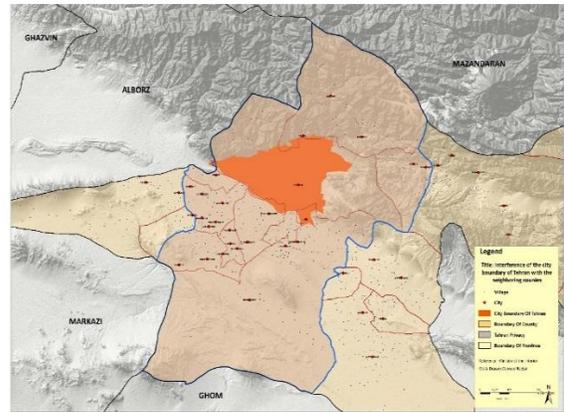


Figure 1: Privacy map of Tehran and the Surrounding 25 Cities (Parsboom Consulting Engineering, 2018)

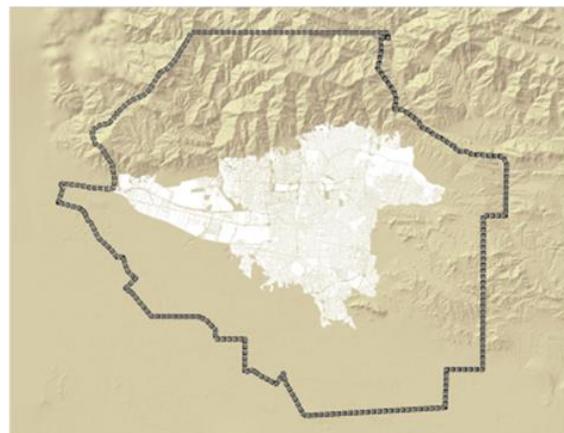


Figure 2: Tehran City Privacy Map in 1970 (Farmanfarmaeian:1970)

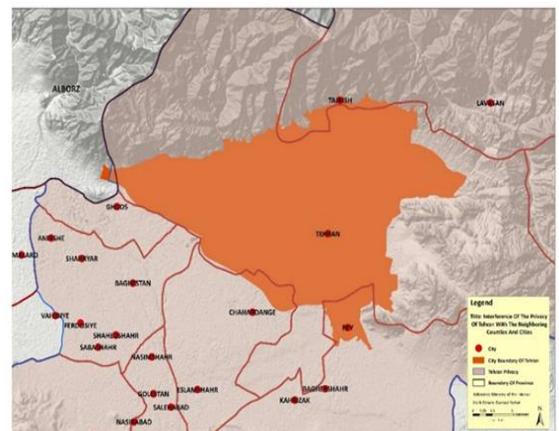


Figure 3: The map Shows the Interference of the City Boundary of Tehran with the Two Counties of Shemiranat in the North and Ray in the South and with the Province of Alborz in the West. (Parsboom Consulting Engineering, 2018)

proximity was due to the growth of small towns and the advance of the construction and expansion of the city to the use of such as the cement plant and refinery and the cemetery, etc. But this does not apply to all applications. In any case, social issues and citizen rights should also be interfered with in locating such applications. Putting user-friendly pollution precisely in the vicinity of towns and neighborhoods is unacceptable and away from today's urban development indicators. In the long run, they must be moved or their activities are conditional upon the observance of the health and safety requirements of environmentalists.

²¹ Perhaps in this case the extent of the proposed privacy will be beyond the current conditional province!!!

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