Date: 12. June. 2013

sustainability
initiatives

To
The Town Planning Officer/City Engineer
Pune Municipal Corporation,

Shivajinagar Pune 411005

Subject: Objections and suggestion to the Draft Development Plan for Pune City for 2007-2027

Dear Sir,

To begin with, we would like to appreciate the efforts taken by the team which has been involved in the preparation of the Proposed Development Plan for Pune 2007-2027 and all its allied documents and maps contained therein.

We, as professionals in the fields of Architecture and Planning, under the Sustainability Initiatives organization wish to bring to your notice certain objections and suggestions in specific clauses, proposals and rules outlined in the proposed DP for Pune and the supporting Development Control Rules.

We request you for a meeting / hearing so as to provide better explanation of the objections and suggestions that we have outlined in this document.

Kind Regards

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GENERAL OBJECTIONS AND SUGGESTIONS TO THE PROPOSED DP	
1	**Non Transparency and Lack of Information**
	▪ No information has been made available regarding a **Review of the DP of 1987-2007** giving data on percentage of successful implementation, reasons for non implementation, mistakes to be rectified, successful policies so far etc, which can be a guiding document for future policies and frameworks. ▪ We have not been made available a Detailed Existing Landuse Survey (ELU), undertaken by College of Engineering, Pune to be able to make comparatives between ELU and Proposed Landuse ▪ We do not have a document that lists clearly a Comparative Statement to show percentage of changes between 1987-2007 DP, ELU and Proposed DP 2007-2027
2	**No presentations have been given to the public by Pune Municipal Corporation,** no simplified information has been provided so as to make it easy for citizens to understand and the plan is **not available in the local language of Marathi.**
3	**The Proposed DP lacks any specific 'aspirational' objectives** which are related to evolution of Pune from a organic urban settlement to a 'metropolis' or a 'global city'. For this it is suggested that a set of supplementary Plan policies be created specific to projects / issues like. *(a) Heritage Conservation & related tourism.* *(b) Bio-diversity Urban on Hill top, Hill slopes & BDP reservations.* *(c) Urban Parkland policy.* *(d) Creation of High density Landmark City Centre.* *(e) Parking requirement & provision.* *(f) Sports encouragement policy*
4	**The Proposed DP does not show any kind of joined-up thinking or integrated planning** and interface with other PMC initiatives is missing.
5	**The Proposed DP lacks vision in terms of making provisions for new requirement** of amenities and civic facilities, considering that Pune is planning the city till 2027.
6	The Proposed DP should also focus on rectifying institutional / administrative structures for effective implementation. It should speak about creation of new departments / teams for the effective formulation & implementation of supplementary planning policies / projects proposed under the DP. This is not evident in the DP document and **we object to a DP that does not take into considerations its effective implementation.**
OBJECTIONS TO THE LANDUSE POLICIES OF THE PROPOSED DP	
7	LANDUSE: ▪ **We object to non adherence of UDPFI Guidelines in allocating Landuse.** ▪ Commercial Landuse allocation is suggested to be 4-5%, but Pune's DP allocates only 1.38% for commercial landuse, making it grossly insufficient to serve the

purpose of commercial activity in the city. This will result into generation of either illegal conversion of residential spaces into commercial or rise of informal commercial activity, leading to street & footpath encroachment. **We object to a low landuse allocation for Commercial Spaces.**

- Recreational Landuse allocation is suggested to be 15-20% as per UDPFI, but Pune's DP allocates a mere 6.89% as recreational Space. Further, the UDPFI Guidelines require a 10-12 sq m of Recreational space per person. But, Pune's Proposed DP allocation of 6.89% allocates 5.5 sq m of Recreational Space to Pune's citizens with the current population. This will further reduce based on population projections for 2027, bringing it down to 3.7 sqm per person. **We object to dismally low allocation of land for Recreational Purposes.**

- The Landuse allocation for Traffic & Transportation is minimally low in the Proposed DP considering that the city needs to encourage Public Transportation. Also, there is a discrepancy in reporting of Traffic and Transportation landuse. In the Existing Landuse Survey, the area under roads is indicated as 15.99%. Now the total area under Traffic and Transportation, including roads, is proposed as 15.25%. Where then, will public transport amenities be planned and built in Pune. **We object to this non prioritization of public transport facilities.**

- The Landuse Under Hill Tops and Hill Slopes (HTHS) has reduced from 8.38% (as per Existing landuse survey 2007) to 5.71 % (as per proposed DP 2007-2027). **We demand clarification on this reduction and Object to reducing further any areas under HTHS in the city of Pune.**

- The Landuse under Water Bodies has been reduced from 6.37% (as per Existing landuse survey 2007) to 4.72% (as per Proposed DP 2007-2027). **We demand clarification on this reduction and Object strongly to any encroachments/ landuse proposed that are shrinking the Water Bodies of Pune.**

- Slums occupy 3% of the city as per the ELU 2007, yet provision for EWS housing and Slum Improvement has hardly increased in the proposed plan. Only 490 hectares is allocated for EWS/SI, yet the housing plan itself (Table 10-10) states the need for 560 hectares for EWS and 450 hectares for Low Income Group (LIG) housing, for which no provision has been made. The Housing study estimates that 2500 hectares are needed for MIG and HIG housing (even with an overestimated

	population), the existing residential area is already 3000 hectares, yet this has been increased to 4700 hectares. **Thus, increase in FSI to meet the demands for HIG and MIG Housing is therefore entirely unjustified and we object to it.** ▪ Provisions have been made for allowing SEZs and IT Parks in the no-development/green zones. in the 1987 DP for Pune, this policy was to attract IT sector to the city. However, this policy need not be taken forward considering that Green Zones in the city are already pressured and threatened. **We object to this incentive for IT buildings and it is completely unacceptable.**
8	METRO INFLUENCE ZONE ▪ **We object to alignment of a Metro Influence Zone in Pune.** The idea of densifying a zone for commercial viability of a Metro project is unprecedented, ridiculous, oppressive and utter nonsense. Metro Projects cannot be planned in this manner. The appropriate approach should be to densify the city centre over a period of time & subsequently align a Metro route based on the transportation requirements at that time. ▪ **We object to the 4.0 FSI to be allocated in the Metro Influence Zone.** The additional built up area will create high levels of street crowding in the next 5-7 years and construction of Metro has uncertain timelines. The logic of increasing urban density to suit the condition for viability of a Metro is unjustified and this move of 4.0 FSI will reduce the quality of life of citizens considerably by adding to traffic congestion and reducing the per person availability of Open Spaces in these areas. ▪ The scale of an increase to 4.0 FSI in the Metro Influence Zone is not adequate addressed and understood by the Planners of the Proposed Pune DP. A quick analysis is as follows: *Total Length of the proposed Metro = 60.52 km* *Total Metro Influence Zone (500 m on either side) = 60.52 sq km = 60520000 sq m* *% land under Metro Influence Zone = 24.9%, one quarter of the Pune city will be under this Zone with 4.0 FSI* *Estimated Land Area that can be built with 4.0 FSI (~ 35%) = 21182000 sq m* *(* Additional TDR or Non FSI Loading on this base FSI will further increase this estimate)* *Total Built up that can get generated in this zone with 4.0 FSI = 8,47,28,000 sq m* ▪ **We object to this densification of the core city of Pune to make a Metro project viable,** when Recreational Spaces are dismally low in the city.

9	COMPREHENSIVE TRANSPORTATION PLANNING ▪ The only traffic study done for the purpose of the Proposed DP is the Evaluation of Development Plan towards Sustainability for Pune Metropolitan Area by IIT Mumbai. The study proves that in case of 4.0 FSI in the Metro Influence Zone, there will be 25% reduction in motorized travel and travel lengths. ▪ However, it is important to note that this reduction is motorized travel and travel lengths is due to the fact that the city will be more dense and compact and cannot be solely assigned to the Metro project. It is technically wrong to base the entire Transportation Planning in Pune on a single project like a Metro. ▪ **We suggest that similar scientific studies be commissioned by PMC to show what is the Environmental and Social Impact of Metro, estimated Congestion levels on streets and Infrastructure Assessment study to examine impact of Metro, 4.0 FSI and its real contribution to city's transportation planning.**
10	CLUSTER DEVELOPMENT POLICY ▪ **We object to a badly designed and vague Cluster Development Policy in the core city.** The Proposed Cluster Development will result into removal of the entire core heritage precinct of the city. Despite the policies related to 'listed' of Grade I, II and III structures, it is important to note that the overall city's fabric will be lost due to the proposed Cluster Development policy. ▪ It is estimated that the purpose of the Cluster Development Policy, which is to free up ground space/open space in the congested areas of the city, will not happen. Instead, we will see increased street crowding, podium like structures for private car parking and very tall, new buildings adjacent to our historic buildings. ▪ **We suggest that a properly designed Cluster Development Policy be extended to plots above 1 hectare in Non-Congested areas** as well to enable better planning of facilities, infrastructure and free up Green Space for neighborhoods.
11	INCENTIVE FOR MIDDLE CLASS HOUSING REDEVELOPMENT ▪ **We object that there is no policy / strategy outlined in the Proposed DP for Redevelopment of middle class housing stock in the city.** There is on incentive available on FSI. It is important for middle class tax payers of the city to have a chance to rebuild their old homes as per new DC Rules. However, with no incentives, Redevelopment of Old middle class housing will either suffer or people will move outwards towards Pune's fringe area for larger homes. This social

	displacement will cause breakdown of the social fabric of the city.
12	INCENTIVES FOR HOTELS AND HOSTELS ▪ **We object to a random incentivization of three star and above hotels and hostels** in the city without any considerations for road widths, locational requirements etc. This will create a clash of landuse as is experienced on localitites like Apte Road, where primarily residential landuse is stretched to include hotels. ▪ Further, residential localities around educational institutes will see a spurt of hostel accommodations, creating chaos and loss of quality of life for residents. Further, there is a probability that Hostel buildings will get converted into hotels in prime residential areas. ▪ Hostels can be incentivized for Educational Institutes if provided within campus. Making it mandatory to have a hostel catering to a percentage of out station students will involve educational institutes to 'block' hostel accommodations, not requiring incentives of FSI.
13	INCENTIVES FOR PARKING ▪ **We object to the incentivization for building Parking Structures** and generation of additional Parking space by private developers. This will lead to disincentivization of Public Transport and will result in ugly Parking Structures coming up in the city. ▪ There is no analysis on the requirement of Parking in Pune to justify this incentive and we suggest that such a study be commissioned by PMC to make its Parking Policy ▪ We suggest that the Proposed DP can look at alternative mechanisms to generate only adequate Parking space in the city, using measures such as: No-parking / No stopping zones, Double Parking zones with timings; reduction in parking requirements and annual charges to be levied by PMC on parking which is provided in addition to the requirements.

OBJECTIONS ON THE DEVELOPMENT CONTROL RULES (DCR)	
14	**PART 1: Administration: Chapters: Definitions , General**
2.13 Building Height	Please add, features which are for common use and are not for habitable purpose which will also be excluded from computation of building height. **Note** : For purposes of Fire Safety of related compliances, height of the building will be measured from the road.
2.20 Carpet Area	Please clarify that this area excludes enclosed balcony, double height or attached terraces, dry balconies and all such fungible spaces. Please add non residential uses as well to this definition.
2.27 Courtyard or chowk	Please add that 'service duct' as a definition. In case of mechanical ventilation the requirements of Inner Outer chowk will not apply to service ducts.
2.44 Floor area	Please list the exclusions of features like enclosed balcony, double height terraces, projections etc.
2.61	Please provide separate definitions for: • Licensed Architect • Engineer • Structural Consultant **Please add** : • Project Management Consultant • Construction Management Consultant
15	**Chapter: Procedure for obtaining building permission**
6.2.1 to 6.2.6	Do we need these details as there is mandatory implementation of Auto DCR? Otherwise, Auto DCR system should be voluntary ?
16	**Part 2: General Building Requirement: Chapter: Requirement of site**
9.1 (k)	*All the land comprised in the area lying within a distance of approximately 457.2 m (500 yards) from the crest of the outer parapet of the High Energy Materials Research Laboratory (HEMRL), Sutarwadi, Pune as shown on Development Plan shall not be used for building construction and kept free from other obstructions.* Please check latest status. HEMRL has moved most of explosion tests to Indore. Hence is the 457.2 m distance required? ***We suggest that the most recent correspondence with HEMRL or MoD should be used to clarifying this condition.***
9.1 (i)	*If the level of the site is less than prescribed Datum level depending on topography and drainage aspects.* ***We seek your clarification on this issue.***
17	**Chapter: Regulations for sub-division of land and layout**
11.1.3 (i)	It is suggested that '2000 m^2 or more' be revised to '20,000 m^2' or more for plot area and add ' 20,000 m^2 or more' FSI whichever is greater, ***considering that scales of projects have changed since last revisions to DCR and redundant clauses should be rectified.***
11.1.3 (i) (a,b,c) area allotted for EWS, LIG, MIG	Please clarify the Criteria of measurement of area. Please add that the mentioned area will be excluding enclosed balcony, double height terrace, dry balcony, attached terrace and any architectural projections.

11.1.3.1	*For layout of land admeasuring 0.4 ha and above, if the owner/developer constructs a toilet block as directed by the Municipal Commissioner, and provides a separate access to the same for use of the general public and hands it over to PMC he may be allowed to do so. In lieu of the constructed area handed over to PMC he will be entitled for FSI equal totwo times the area handed over ...* ***It is suggested that there should be a limitation of 100 m^2 for this area of toilets excluding area used in staircases and passages.***
11.3 Open Spaces	Please add the following suggestion. ▪ For plots which are between 0.2 ha to 3 ha. Requirement of 10% Open space can be condoned up to a max. of 50% of the required area by payment of premium which will be decided by the commissioner from time to time. ▪ This will also require the permission of the City Engineer, Construction.
11.6 Convenience Shopping	▪ It is suggested that "Convenience Shopping" can be a voluntary requirement. Not mandatory. ▪ Please change "shall" to "may" in line 2 of 11.6 ▪ It is further suggested that "affordable workspaces" be defined in a simple format. The proposed conditions are very complicated and will be open to lots of different interpretations.
11.7 (iv) site for electric transformer / substation	Transformer should be permitted in front margin but leaving footpaths.
11.8 Amenity Space	It is suggested that this requirement be removed completely as the government administration has the opportunity to add reservations / acquire land for all uses / purposes through the D.P. process of various other acts under the Indian Constitution. This area in addition is not a good idea. *i) For net plot area between 0.4 Ha to 2 Ha - amenity space of 15% shall be provided,* *ii) For net plot area between 2 Ha to 5 Ha- amenity space of 15% shall be provided.* *iii) For net plot area more than 5 Ha- amenity space of 15% shall be provided.* We suggest modification in above as follows: ▪ 11.8.(a) (i) to Zero ▪ 11.8.(a) (ii) to 5% beyond 3 ha. ▪ 11.8.(a) (iii) be removed.
18	**Chapter: Landuse classification and use permitted**
12.2.1 (d) & (e)	*d) Construction of multi-storeyed garages may only be permitted on parking lots.* *e) Shifting and/or interchanging the purpose of designators/reservations in the Development plan, the Commissioner with the consent of interested persons may, shift, interchange the designations/reservations in the same or on adjoining lands/ building, to which an access is available or has to be provided and the same is not encumbered, provided that the area of such designations/reservations is not reduced.* We suggest that these inclusion be made in the Proposed DCR.
19	**Chapter: Marginal open space, area and height limitation**
13.0	We suggest that the "front setback or marginal space" which is along a road / street

	would be uniform along the length of the street. We suggest that in addition to the Road widening line (Red) in the maps of the DP, additional fixed line (blue) be added on the maps. This should feature in the D.P opinion & should be uniform along the length of the street / road. This will be mandatory. Relaxation may be approved only on permission from the State government.
13.1.2	**Building Abutting Two or More Streets** It is suggested that '300 m^2' be increased upto '1000 m^2'.
13.1.4	*If the length or depth of building exceeds 40 m, an additional marginal distance of 10% of the required distance shall be necessary on the side or rear open space as the case may be. For narrow plots that is, those less than 15 m in width or depth the side or rear marginal open spaces may be relaxed as in Table 23 & 25.* It is suggested that this be removed.
13.1.6 (i) & (ii)	*(i) For buildings/ wings which are connected at stilt level by minimum 3 m width slab the distance between 2 wings shall be 6 m for building height upto 21 m & 7.5 m for building height upto 36m.* *(ii) In case of building of height more than 36m which may or may not be connected by podium or basement, the distance between the buildings shall be equal to the marginal open space required for the adjacent tallest building.* We suggest that these be added: ▪ In layout of buildings (more than 1 building) providing a internal road should be voluntary. ▪ Provided emergency vehicle (ambulance / fire tender) access is maintained, buildings can be planned with inter-building distances without compulsory connection by a 3 m wide slab or a beam. ▪ The width of such access shall be minimum 6.0 m wide & construction shall be sufficient to withstand the load of a fire tender truck.
13.2.1.1	*Where only water closet and bathroom are abutting on the interior open space, the size of the interior open space shall be in line with the provision for ventilation shaft as given in regulation No.15.13.5* It is suggested that 'kitchen' should be added.
13.4.1. (c) (iv)	**Features Permitted in Marginal Opens Space** It is suggested that double height terraces & toilets can be allowed till the extent of balcony projection.
13.4.2 (a)	*In an existing building a single storey sanitary block subject to a maximum area of 4 sq.m in the rear and side open space and at a distance of 7.5 m from the road line or the front boundary and 1.5 m. from other boundaries may be permitted where facilities are not adequate. The Commissioner may reduce the 1.5m margin in rare cases* *to avoid hardships.* **It is suggested that this clause be removed.**
13.5	**Aerodrome / Gliding Centre Vicinity Height Restrictions** It is suggested that this be removed from the DCR as it is subject to change from MoD at their discretion. Only a reference to this should be made in DCR.
20	**Chapter: Provision for parking spaces**
14.0	It is suggested that " Parking Provision " should be " Supplementary Planning Policy" as it is likely to be modified at smaller internal / period (e.g five years) in comparison to the 20 year tenure of the Proposed DP.
14.6	*In any case, mechanical parking shall not be allowed in marginal open spaces.*

	We suggest that Mechanical parking should be allowed in side setbacks to optimize space usage.
	We suggest that Please add 14.10 Deficiency in the required parking up to a max of 50% can be permitted / condoned on payment of premium decided by the commissioner from time to time. This will require permission from the City Engineer.
14.8 & 14.8.1	***14.8:-*** *Independent parking building shall be allowed with 50% marginal distances subject to minimum of 3.0 m the distance between Main building & parking building shall be based on the height of both the buildings shall be left. The Independent Parking building shall be free of coverage & FSI calculations, no premiums shall be charged on the same.* ***14.8.1*** *If some floors of the building are to be shown entirely as parking floor then the floor height should be deducted from height of that building (including toilet block) Parking may be allowed on any floor and height of parking floor should be deducted from height of that building. Ramps for basement and parking floor may be permitted in side margin. For parking on upper floors, railing, grill or wall up to 1m height shall be provided for safety.* We suggest that these clauses be included as provisions in the Parking requirements
Chapter: General Building Requirements	
15.2.2	We suggest that the provision of Kitchen Height of 2.75 m can be reduced to 2.4 m.
15.3.3.(c)	*Every room to be used as Kitchen shall have refuse chutes in case of multi-storeyed residential buildings more than 15 m. in height* It is suggested that provision of a refuse chute should be voluntary / recommendatory in nature, applicable to suitable site/project conditions.
15.6.3.	*We suggest that the projections (cantilever) of cupboards and shelves may be permitted and would be exempted from covered area calculations. Such projections may project up to 23 cm in the setbacks for residential buildings provided the width of such cup-board/shelves does not exceed 2.4 and there is not more than one such cupboard/shelf in each room.* Width of 2.4 m should be increased to " the width of the wall / room " on which the cupboard is designed.
15.13	**Lighting and Ventilation of Rooms** We suggest that for the above provision, Reference should be made to the National Building Code 2005 & details should be removed from DCR.
15.23.3	**Solar water heating system** We suggest that some basic detailing should be included in the DCR Further, We suggest that Deficiency in this requirement upto 50% to be condoned on payment of premium to be decided by Commissioner from time to time.
15.24.	*Any Layouts or Housing complexes designed to accommodate 80 tenements or more shall compulsorily have a Sewage Treatment Plant to treat the effluents to the desired levels of purity and shall there by provide for recycling of water consumed by the said complex. Recycled water shall be used for toilet flushing, gardening, etc.* We suggest that the proposed DCR should remove the criteria of number of tenements & add the following: ▪ Residential : more than 10,000 m^2 BUA. ▪ Non-residential : more than 20,000 m^2 BUA.
Chapter: Exit Requirements	
17.0	We suggest that under this provision, Reference should be made to the National Building Code 2005 and all 17.0 should be removed.
Chapter: Special Requirements of Occupancies	

19.6.1	**High Rise Buildings** Suggest Sr.No.7 in the table be changed to "Above 100 m" only & " upto 150 m" be deleted. ▪ For Sr.Nos. 1 to 7 "other margins" (column) should be changed from 7.5 m to 8.0 m & 9.0, 10.0, 12.0 & 15.0 should be changed to 11m. This helps in parking which can be provided in side setback. ▪ Front margins should be according to suggestion given for 13.0.
Part 3: Structural Safety and Services	
	We suggest that Reference should be made to the National Building Code 2005 & relevant IS codes. The details should be removed from Proposed DCR for sections 20, 21, 22, 23, 24. This will reduce confusion & risk of outdated standards being applied.
Appendix B	**Form of supervision.** It is suggested that " Construction / Project Management Consultant " be included as well.
Appendix C	**Qualification of licensed technical personnel.** We suggest that this should be removed. It is suggested that PMC is a planning & administration body (ULB) & it should not be involved in licensing & quari-judicial roles. As there are other agencies which have a mandate to do the same. PMC can interact with respective agencies / organisations in the event of any irregularities of blatant non-conformities by the technical persons / organisations.
M-6.5	**Industries Zone:** (ii) We Suggest reduce " 5%" to " 3%" (ii) b - We Suggest reduce "15% to 5%" (ii) c - We Suggest reduce "20% to 10%"
	Note No.3 on page 189 – We suggest that this be removed
M-7.1	**Green zone /Green belt:** We suggest adding the following: (17) – Offices of consulting organisations.
M-8.1	**Hill top/hill slope zone** We suggest adding the following: (8) – Offices of consulting organisations.
N.2.1.2-(a)	**Cluster Development Policy for Congested Area** Suggest removing " only on ground floor".
N.2.1.2-(a) (III)	Note (ii) – Suggest removing this citing for the same reason as removal of Appendix C
10.3.6	**Roads in congested areas** We accept the widening of roads as mentioned till 9m so as to get minimum carriageway of 6m. ▪ We suggest that the maximum ROW for congested areas should be 18m. ▪ We suggest that the roads of ROW more than 9 m need not be widened. OR the proposal of widening should be supported by proposed road network pattern based on detail study.