
This is in follow up to our earlier letter to you dated 29th July 2011 on the subject of Facilitating and ensuring wider consultation in the formulation of the Development Plan of Mumbai 2014-2034.

The Stakeholder group on Urban Form is by this letter forwarding you its initial suggestions for the Development Control Regulations (DCR) for the revised development plan.

1.0 PREMISE

1.1. Intent of DCR should be protection and enhancement of public good which may supersede individual rights.
1.2. Put in place transparent evaluation and approval processes for building approval
1.3. Involve local community in the evaluation process of all public projects.
1.4. Public Space is to be considered sacrosanct.
1.5. There can be no lowering of standards of built form, light and ventilation and public amenity provision in DCR.
1.6. Urban form should be defined by an understanding of livelihood, housing, environment, Transportation, health, education, energy, water and sanitation and security.

2.0 STRATEGY

2.1 Demarcate the planning localities
Mapping of the city should be carried out to identify the various localities. These localities can be mapped based on a similarities in history, show similar livelihood patterns, those developed by a certain agency (government/ private/trust) or developed at a given point of time, or slum pockets, or showing certain common physical characterstics.
2.2 Studies of each of the localities
Each of the localities need to be studied in detail to understand its present activities, existing infrastructure, building heights, ground coverage, setbacks, FSI, typological conditions, livelihood patterns, light and ventilation conditions, plot sizes, etc. This would be towards establishing building potential.

2.3 Develop specific DCR for each of these localities
Based on these studies, develop specific development control regulations for each of the localities.

2.4 Establish Difference between Development Right and Building Potential
There may be difference between development rights available to plot owner and the building potential that is available on his/her plot. If the difference is positive, i.e. if the building potential is lower than development right then the balance development right should be transferred to localities having building potential higher than development rights. This means localities which have higher infrastructure etc. can absorb development from localities having lower infrastructure.

2.5 DCR for informal localities
Localities with significant amount of slums, should be identified as informal localities and special development control regulations for up gradation and reconstruction of such localities should be formulated with community participation.

2.6 Language of DCR to be simplified removing all possible individual interpretations.
The Written regulation can be interpreted in many ways and needs to be concise and unambiguous. No Discretionary modifications to DCR should be possible. FSI should be defined in clear and complete terms with no “free of FSI” spaces like flower beds, balconies, car parking, etc.

2.7 Section 33 of the DCR to be removed.
Section 33 of the DCR have been relaxed compromising the habitability aspects. This should not be carried forward into the new DCR.

2.8 Implement systems for evaluating the urban impact of infrastructure through a transparent community participation process.
Approval submissions for large public projects (exceeding 5000 sqm) should contain an impact assessment of such a project on the locality. Such a proposal should be made open for public review. The suggestions and objections of the people, if found reasonable, should be incorporated in the design.
2.10 New forms of town planning schemes will need to evolve
New forms of town planning schemes will need to evolve that are appropriate for Mumbai where land is of such high value. The pitfalls of traditional TPS schemes that have been attempted but failed in Mumbai must be studied to evolve an implementable mechanism.

2.11 Incentivise residential, commercial and amenity plots to give barrier free public spaces to the city so that the percentage of public space per person can be increased. Encourage the creation of Urban open spaces such as plazas and promenade.

2.12 Environmental features should be protected
The edges along water courses need to be protected and reserved as public open spaces. Further efforts should be made to open private occupation of water edges to public.

These are our initial suggestions for your consideration. We will be looking at how we can build on these strategies in the future deliberations of the group and will follow up on these suggestions in greater detail. We will also be happy to further elaborate these suggestions to you in person if you should allow us this opportunity.

Thanking You,
Yours Sincerely

Cyrus Guzder
Trustee - UDRI

Arvind Adarkar
Architect

Pankaj Joshi
Executive Director-UDRI

Mustansir Dalvi
J J College of Architecture

Anirudh Paul
K Raheja Inst. For Arch.

Akhthar Chauhan
Rizvi College of Architecture

Alpa Sheth
Structural Consultant

Pronith Nath
Architect

Rajeev Thakker
Studio X, Architect

Rupali Gupte
Collective Research Initiatives Trust

Prasad Shetty
Academy of Architecture