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President, Navi Mumbai  
Arvind Goel

Ref. No.: MCHI/PRES/14-15/010

Date: July 3, 2014

To,  
**Hon'ble Shri Prithviraj Chavan**  
Chief Minister,  
Govt. of Maharashtra  
Mantralaya,  
Mumbai - 400 032.

**Sub:** Suggestions/ Objections regarding the Modification to Special Township Project Regulations for inclusion of land under Commercial Zone in Special Township Projects.


Respected Sir,

We hereby put forth our suggestions/objections regarding the policy for inclusion of land under Commercial Zone in Special Township Projects as follows:

As per the said policy, Special Township Project may include land under commercial zone subject to condition that 50 percent of built-up area from the land under such Zone shall be for the purpose of commercial user, with remaining 50 percent for the Residential and allied users.

**Objections :**

- 1 The main objective of proposing a Special Township Project is creation of housing stock with full-fledged infrastructure and amenities in peripheral areas of Urban conglomerates, so as to reduce the load on existing infrastructure.
- 2 In a Special Township Project, educational, health-care, recreational and public/semi-public facilities also have to be provided in addition to residential and commercial users. All these facilities including the commercial development in such townships are supposed to be sustained by the residential component of the respective township.
- 3 If the total built-up area for residential component and allied users is limited to 50 percent of the total built-up area, and 50 percent area is to be utilised purely for commercial users, the project may not be sustainable, hence limiting the residential component to 50 percent of total built-up area is not justified.
- 4 As per clause no. 4:A 1 of Appendix D of Development Control Regulations of the sanctioned Mumbai Metropolitan Regional Plan, all uses permitted in Residential zone are permitted in Commercial zone subject to condition that minimum 20 percent built-up area should be for commercial use.

  
मुख्यमंत्री सचिवालय  
महाराष्ट्र शासन  
मंत्रालय, मुंबई ४०० ०३२  
दिनांक ३१/७/१४

**MCHI-CREDAI** (ISO 9001:2008)

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**Suggestion:**

When special township project proposals that include land under the commercial zone are been considered for permissions under the Special Township Policy, a minimum of 20% of the built up area should be reserved for commercial use, with the option given to the developer to go upto 50% of commercial usage, wherever feasible.

We hope that due consideration will be given to our objections / suggestion.

Thanking You,

Yours Sincerely,  
For MCHI-CREDAI



**Nainesh Shah**  
Hon'ble Secretary