



Advocacy - Governance - Renewal

To,
Divisional Joint Director,
Town Planning, Konkan Division,
Konkan Bhavan, 3rd Floor,
Belapur, Navi Mumbai - 400602

11 November 2025

Subject: Suggestions/ Objection to the Proposed Inclusion of Provision No. 15.5, Chapter No. 15, UDCPR-2020

We, from NAGAR, are formally submitting our suggestions and objections to the proposed inclusion of Provision No. 15.5, Chapter 15 of the UDCPR-2020. Our comments, outlined below, aim to ensure that the proposed amendments uphold principles of transparency, public accountability, and equitable urban development. Our suggestions/objections (in brief) are as follows:

With respect to Points I and II of the proposed Regulation 15.5 of the UDCPR2020, as follows:

Regulation 15.5, I.:

Any alignment modifications introduced in Metro/Mono/Coastal Road/ Elevated Corridors/ Corridors of Mass Rapid Transport System, including BRTS, by the appropriate Authority and sanctioned by Government shall stand automatically amended on the Development Plan as modified.

Regulation 15.5, II.:

Furthermore, any new "Transport Corridor" such as Metro/ Mono/ Coastal road/ Elevated Corridors/ Corridors of Mass Rapid Transport System, including BRTS, proposed by the appropriate Authority and sanctioned by Government shall stand automatically added on the Development Plan.

1. Safeguard the democratic process of inviting public Suggestions/Objection for modifications to the Development Plan (DP)

NAGAR acknowledges the intent to enhance coordination across planning levels, enabling integrated and transparent city development. However, the proposed provision lacks clarity on the process for public input. NAGAR recommends that all modifications or additions to the Development Plan strictly follow the due process under the MRTS Act (Sections 28 and 37), ensuring public suggestions and objections are invited, reviewed, and incorporated to uphold transparency and accountability.

2. Demarcate accurate Right of Way (ROW) along with alignments for all Transport Corridors on the DP

NAGAR further recommends that the Right of Way (ROW) for all new or modified transport corridors, such as Metro, Mono, Coastal Road, Elevated Corridors, MRTS, and BRTS, be clearly



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marked in the Development Plan along with alignment details. Accurate depiction of ROWs will allow better assessment of their on-ground impacts, particularly on natural drainage and stormwater systems, helping to design effective mitigation measures and resilient land use strategies.

3. Lands earmarked for Metro Car sheds should revert to their original reservation after such temporary use

With respect to Point III of the proposed Regulation 15.5 of the UDCPR-2020, which is as follows:

Regulation 15.5, III.: After finalisation of site for Metro Car shed by the Competent Authority, the portion of land reserved/ earmarked for the Metro Car Shed in DP, if not required by the Competent Authority subsequently, shall be deemed to be deleted from the said reservation and included in adjoining predominant zone. In such case, the Metropolitan Commissioner/ Municipal Commissioner/ Chief Officer shall issue a written, well-reasoned, speaking order modifying the Development Plan to that effect and copy of such order along with certified part plan, shall be forwarded to Govt. and Director of Town Planning, Maharashtra State, Pune for record

- 1. NAGAR strongly objects to the provision allowing public lands temporarily used for Metro Car Sheds to be absorbed into adjoining predominant zones.** This risks the permanent loss of land reserved for essential public purposes such as open spaces, schools, and hospitals, undermining long-term public interest and equitable access to amenities. NAGAR recommends that all such lands must revert to their original reservation and designated public use once the temporary infrastructure is decommissioned or relocated.

We request that our objections be duly recorded and considered in the decision-making process. We are willing to provide any additional information/documents that you may require in respect of the above submissions. NAGAR wishes to place on record that all the above points have been given in the best public interest. We look forward to an affirmative response.



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About NAGAR:

NAGAR is a not-for-profit organization established in 2000, born out of the passion of several citizens with a goal to improve life in the city of Mumbai. NAGAR's former constituents are CitiSpace, CLEAN-Air and CLEAN-Sweep. NAGAR continues to work in the area of preservation of public open spaces, solid waste management, improving air quality, preservation of water bodies, beaches, mangroves, built and natural heritage, efficient road space management and water conservation. The organization is committed to advocating for better enforcement of existing laws, recommending policy changes for improved governance on civic matters, and contributing to urban renewal efforts. NAGAR has a broad network of citizens across the city and collaborates with other civic NGOs to address specific issues.

Yours Sincerely,

Ashwini Deshpande
Associate Director

On behalf of Trustees

Atul Kumar D M Sukthankar Dinesh Ahir Kunti Oza
Meher Rafaat Nayana Kathpalia Neera Punj Parul Kumtha