HAPHAZARD COMMERCIALIZATION: A POTENTIAL THREAT TO SUSTAINABLE COMMERCIAL DEVELOPMENT IN METROPOLITAN CITIES? THE CASE OF LAHORE

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ABSTRACT

The demand of urban space for commercial development due to unprecedented population growth has surpassed the planned supply delivered by planning agencies in metropolitan cities of Pakistan. As a corollary to that, conversion of residential land use into various types of commercial activities has sprung up particularly along major roads of planned residential areas and arterial roads of cities. These conversions have proceeded, both with and without official consent, largely in a haphazard manner without following a coherent strategy. This has resulted in acute parking problems, reduction in traffic capacity of roads and resultant increase in congestion, energy use, air and noise pollution, and burden on utility services. Permitting conversion of land use in a haphazard manner seems not only a departure from planning principles but also jeopardizing the spatial structure of cities causing serious environmental repercussions.

This paper presents evidence to the above observations through a detailed study of the environmental impact of commercial development in Lahore. The study is based on detailed land use, socio-economic, traffic, and parking surveys in carefully selected sample of three major housing schemes variously located in Lahore. The paper argues that weak development control, out-dated master plan, and inappropriate commercialization policies of the Government have lead to unsustainable pattern of commercial development even in planned residential areas. The findings of the study call for formulation of environmentally friendly commercialization policy. This will also involve redefining basic land use allocation standards and improvements in the design considerations so as to promote sustainable development of commercial areas in metropolitan cities.

KEYWORDS
Commercialization, Policy, Land use, Environmental Impact, Lahore, Sustainable

INTRODUCTION

Commercialization of residential properties is spreading at an alarming rate particularly in the metropolitan cities of Pakistan. Though traffic congestion, parking problems, and air and noise pollution have been part and parcel of central business districts and primary roads of the metropolitan cities, these evils of unplanned commercial development have trickled down to the main roads of planned housing schemes in these cities. Satellite town in Rawalpindi, Jinnah colony in Faisalabad, several roads of PECHS in Karachi, Gulberg in Lahore etc are vivid examples of this trend. Even the urban life in the intermediate towns of Pakistan is trapped by the polluted flood of commercialization (HPP & ED, 1994). Why the concerned regulatory agencies have failed to ensure planned growth of commercialization in these cities? The answer to this question lies in a

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1 The uses considered officially as commercial include not only shops, plazas, markets, restaurants, hotels etc., but also private sector educational and health institutions, offices, banks, beauty clinics, gymnasium, clubs and similar other uses.
complex of institutional obstacles to functioning of these regulatory agencies. These obstacles range from weaknesses in the forecasting of future demand of commercial areas and rigid land use allocation standards to inadequate enforcement of regulatory controls and inappropriate commercialization policies. This paper analyses the complex of obstacles to ensuring planned development of commercial activities in the case of Lahore. Lahore is the provincial capital of Punjab and the second largest city of Pakistan. Its present estimated population of 6 million is expected to cross the figure of 14 million by the end of 2021 (NESPAK/LDA, 2004). The high concentration of industrial, commercial and employment opportunities, higher order education, transport and health facilities are the key characteristics of Lahore which contribute to rapid urbanization.

Although, commercialization in unplanned old established areas is not new to us but in case of planned and approved housing schemes it is something which reflects immaturity on the part of planning and development controlling agencies with regard to their expertise in understanding the market forces and future trends. Haphazard commercialization in these residential areas is leading to adverse land use, environmental, socio-economic impacts affecting human health and privacy. Any such commercial development causing adverse impacts can undoubtedly be termed as unsustainable development. In order to save the spatial structure of Lahore and other metropolitan cities of Pakistan the demand for commercial areas need to be met in a planned manner. Otherwise, this TSUNAMI of commercialization will destroy the tranquility and livable environment of residential streets and there will be hardly any place anyone can live in and be sure that tomorrow it will still be a residential area.

THE PHENOMENON OF COMMERCIALIZATION IN LAHORE

In case of Lahore, the phenomenon of commercialization of residential properties is taking place since independence at an accelerating tempo. First, the inner city residential properties were converted to wholesale
and retail shops. As the city expanded this phenomenon of invasion and succession was experienced by areas neighbouring the central business district of Lahore and most of the large bungalows along main roads and even in new housing schemes were converted to showrooms, restaurants, offices and shopping plazas. These conversions proceeded incrementally and essentially in defiance of the city’s zoning bye-laws (Qadeer, 1983). The process continued in the wake of increased demand for commercial activities triggered by rapid urbanization of Lahore and many streets of the planned housing schemes also started experiencing conversion of residential buildings into commercial uses and now they are no more predominantly residential. One can witness schools mushrooming in these housing schemes as well as host of other types of commercial uses like shops, eating outlets, tea kiosks, barbershops, grocery stores, clinics, gyms, beauty saloons, government offices, private enterprises – the list is long and despairing. It appears that, these commercial enterprises sprout up overnight and then go on multiplying (Hasan, 2005). Resultantly, the areas that boasted of abundant greenery, boulevards and spacious streets have become a source of nuisance for the residents today. Ahmad (2005) for instance notes that opening up of schools, private offices and other commercial enterprises in residential area of Gulberg is leading to dilapidated roads, traffic jams, and choked sewerage system making streets inhabitable. Some people for whom living in Gulberg was a status symbol in the past are now most keen to vacate this area.

ENVIRONMENTAL IMPACTS OF COMMERCIALIZATION

In order to determine the environmental impact of land use change i.e. conversion of residential properties into commercial, parking surveys and interviews of the residents of properties adjacent to converted plots, shop keepers and the customers were conducted in three carefully selected housing schemes variously located in Lahore. The following section present results of these surveys.

Impact on Human Health

Commercialization though seems to have no direct relationship with human health yet it has significant impacts on health of those either living or shopping in such areas. The survey of residents adjacent to commercialized properties in the three case study areas reveal that 60% and 80% of interviewees respectively rated air and noise pollution (due to increased traffic in the wake of unplanned commercial development) as the most serious threat to their health. The majority of the customers interviewed reported similar problems of air (52%) and noise (52%) pollution along commercialized roads as matter of concern for their health. Studies conducted by SUPARCO for Pakistan Environmental Protection Agency regarding ambient air quality in Lahore during 2004 shows high levels of PM, SO2, NOx, and CO far exceeding the US EPA standards in areas with high concentration of commercialized activities (see web site on http://www.environment.gov.pk for details). This in turn contributes to different kinds of respiratory diseases like asthma, lung disorder and weakening of hearing power.

As much as 60 % of the interviewed shop keepers also mentioned that air and noise pollution resulting from increased traffic congestion also indirectly affects their health. But they do not consider commercialization as the only cause of these problems. They also blame concerned planning agency for doing nothing to provide adequate parking and improving infrastructure despite charging heavy commercialization fee.

Impact on Traffic Flow

It is said that land use shapes and is shaped by the transport. Commercial land use has undoubtedly maximum traffic attraction and generation potential. Since the commercial land use under discussion is unplanned conversion of residential properties into commercial without adequate provision of requisite infrastructure and parking facilities, it is causing devastating impacts on traffic flow. The visitors coming on personal vehicles for
shopping on these commercial roads need space to park their vehicles somewhere along these roads. Due lack of planning for parking facilities, the visitors use the entire service road, road shoulder, and even sometimes the carriage way to park their vehicles, which really create a nuisance for traffic and pedestrians. Over 65% of the residents and 60% of the shop keepers interviewed for this study also mentioned traffic congestion as one of the most serious problem resulted from commercialization in their areas.

Parking problems

The results of interviews with selected customers show that 60% of those coming by car stated they face parking problems during the shopping trips to these areas. The parking survey done for this study reveals that approximately 367 cars were parked along main entrance road in Samanabad and 526 cars along main boulevard in Allama Iqbal Town during peak hour of shopping (8 pm to 9 pm). Out of these parked cars 80% were occupying service roads, while only 15% were parked in the parking spaces provided in front of the shopping plazas. The remaining 5% cars were parked on the carriage way during hours of peak traffic flow. The increase in traffic volume, haphazard on-street parking and encroachments as a result of commercialization not only cause traffic congestion and delays on these roads but also lead to excessive consumption of fuel and resultant pollution. A study conducted on the impact of linear commercialization on traffic flow along Ferozepur road in Lahore also found nearly 50% reduction in traffic speed compared to that on a section of the same road without commercial uses (Nadeem, 97).

Impact on Tranquility of Residential Area

Majority of the residents (75%) living adjacent to commercialized properties when asked whether commercialization should be allowed in residential areas, said a straight forward ‘no’ with the reasons that it seriously affects the residential character and peacefulness of the area. They further stated that it causes lot of traffic problems and environmental pollution.

Socio-economic Impacts

Commercialization does not only bear adverse environmental impacts but also social and economic repercussions. The social problems indicated by the interviewed residents are lack of privacy and accident hazards. Particularly, their children are frightened everyday from the flood of cars and goods delivery vehicles while going to school and coming back home. As far as the economic impacts are concerned, the nature of immediate and direct economic benefits appears to overcome the indirect cost faced by us as a society. This involves loss of work time, waste of fuel, reduced efficiency of people due to adverse impacts on human health and resultant increase on health expenditures primarily because of traffic congestion, air pollution and traffic delays. The direct economic benefits according to all the interviewed stakeholders are increased business and job opportunities (as stated by the regulators and shop-keepers) and decrease in the length of shopping trips (as mentioned by the residents). However, there was a realization among the shop-keepers that planned commercial development would have been more beneficial for their businesses as majority (55%) of them stated so in reply to a question whether they would have been earning more business if their shop lied in planned commercial market.

The above account of the impact of commercialization has generally been illustrative but it does point to the failure of the planning agencies to control the commercialization activities effectively. Secondly, it is indeed questionable whether to avail economic benefits of commercialization at all the aforementioned costs and that why we can’t formulate policies and plans to guide the development process in such a way as to draw economic
benefits at minimum possible cost? The next section attempts to analyse the reasons behind failures to ensure commercialization in an organized manner in Lahore.

REASONS FOR HAPHAZARD COMMERCIALIZATION

Inadequate implementation of Master Plans

The first ever Master Plan for guiding the future growth of Lahore was prepared in 1966, though notified six years later in 1972. This plan anticipated a high pace of commercial establishments and proposed a hierarchy of commercial centers in the new expansion areas by adopting a standard of one shop per 100-125 persons. The proposed hierarchy consisted of divisional centers, district centers, neighbourhood centers, and mohallah centers. Four divisional centers were proposed to be located in the then planning divisions of New University, Kot Lakhpat, Amar Siddhu and Baghbanpura planning divisions. Each centre was to cater to the needs of 400,000 to 600,000 people with 450 to 500 shops related to retail shopping, financial and business establishments, professional and government offices. In addition to divisional centers, 23 district centers were proposed. Each centre was to be planned as commercial cum civic centre and envisaged to accommodate 125 to 150 shops and serve a population of 100,000 people. Additionally, 60 neighbourhood centers were also proposed in the master plan with each centre to have 40 to 50 shops and to serve a population of 25,000.

Although the proposed hierarchy was promising for catering the shopping needs of Lahorites at convenient distances, but only lower order centers were established in new planned housing schemes. Even these centers, mainly serving as town centers of public housing schemes, proved to be insufficient not only for those residing in these schemes but also for the residents of surrounding areas. This non-implementation of the master plan proposal failed to regulate high demand for new commercial areas which in coming years was then met in an unplanned and haphazard manner through conversion of residential properties into commercial ones.

This situation could have been rectified by the Structure Plan prepared in 1980. But the plan proposed commercial development in a different fashion. Major emphasis was given on the establishment of areas of opportunity for light industries and higher order commercial centers along the arterial roads of the city. In addition, a new metropolitan center was proposed near the south-west corner of Lahore Township housing scheme. Unfortunately, all of these proposals could not be materialized partly due to weak development control and partly because of the inability of the concerned planning agency either to acquire land for this purpose or to direct private sector investment according to the provisions of the Structure Plan. The failure to get the Structure Plan notified as a legal document due mainly to lack of clear statutory remit was another reason for lack of proper implementation of the Plan.

A new plan under the title of Integrated Master Plan for Lahore-2021 has been approved recently in October 2004 for Lahore. This plan has thoroughly dealt with the subject of commercial development. The Plan admits that commercialization is a sensitive issue and excessive and inappropriate commercialization may lead to such changes in land use and urban activities which may harm the efficient functioning of an urban centre (NESPAK/LDA, 2004). The current commercialization policies of the Punjab Government have also been criticized (see below for discussion on these policies). It has been categorically stated that “the commercialization policy presently in force suffers from lack of details and is rigid in character”. For instance, the policy states fixed set-back and height for varying sizes of plots along roads declared for commercialization. However, it is difficult to apply these regulations uniformly because as the Plan notes: “it is not very uncommon to see plots of different sizes and dimensions located side by side along the same street. The variation in size ranges from 12 kanals to 1 kanal in case of Main Boulevard in Gulberg to 2 kanals to 3 marlas in Allama Iqbal Town and some other localities” (NESPAK/LDA, 2004). This situation has been called as an anomalous zoning
pattern. In view of the above, Master Plan argues the necessity to lay down standards separately for different plots in terms of permissible height and coverage of site, if such plots are allowed to be commercialized.

But contrary to the above criticism, this Master Plan has identified 133 roads (including those roads where commercialization has not yet fully taken place) of Lahore and proposed that commercial uses should be allowed along these roads. Additionally, mixed commercial cum industrial uses have been proposed to be allowed along 18 roads out of these 133 roads. The Plan seems to have proposed further commercialization along number of roads of Lahore due to the commercialization trend over there. But whether additional commercialization along these roads can be done without making conditions worse in terms of parking needs and traffic load management on these roads need to be thoroughly analysed. If commercialization along these roads is not ensured in planned manner, one can then very well imagine about the mess of haphazard commercial development going to be created in future and its potentially devastating impact on the traffic and travel pattern in the city of Lahore.

**Failure to monitor and anticipate the demand for commercial land use at the strategic level**

Commercialization in our context has meant change of land use from residential to commercial. This in turn necessarily involves departure from both the land use zoning provided in the approved master plan as well as the detailed layout plans of the housing schemes where commercialization is to take place. The need to allow such a change in the land use is a pointer to the fact that both the master plan of the city and the layout plans of housing schemes were not prepared on the basis of sound projections of the current trends of commercialization and anticipation of the future requirements. Interviews with officials of LDA reveal that the Authority has no system to continuously scrutinize the way the Master Plan is working so that necessary adjustments could be made to accommodate changing circumstances. Further, the factors like rapid pace of commercialization, lack of adequate staffing, and preoccupation of the staff with responding to political expediencies have rendered the Authority unable to direct required amount of attention to planning and provision of shopping areas, their location, size and character. The result has been haphazard commercialization with the market operating freely and guiding the whole process at the expense of increasing traffic jams, clouds of smoke and noise pollution on several roads of the metropolis.

**Inappropriate allocation standards for commercial use in residential areas**

The survey of change in land use in the case study areas reveal that the allocation standards for commercial use (for example not more than 2% of the total size of a private sector housing scheme) followed by the planning agencies in Lahore have proved inappropriate over the years. For instance, land use survey shows that in Samanabad housing scheme (Fig.1), which is located close to the central business district (CBD) of Lahore, almost 95% of the residential properties located along the main boulevard have been converted to commercial establishments. This is not the only road where residential properties have been converted but it can also be observed partially along all the secondary roads of this scheme. Nature of commercial activities range from used car dealers to departmental stores and restaurants etc. Originally some 3% of the area of total scheme was provided for commercial land use. At present it amounts to 6.26 % of the total area of scheme. This reflects very high demand for commercial land use allocation, perhaps due to its close proximity to the CBD of Lahore.

But the situation is no different in case of schemes located bit away from the CBD of Lahore. For example, in case of Allama Iqbal Town (Fig.2), which is located at a distance of some 10 kms from the CBD, about 70% of the residential properties along its main boulevard have been converted to commercial establishments. Most of these commercial establishments are of permanent nature and include shopping plazas with a front set back ranging from 10’ to 30’, which is quite inadequate for the parking demand these plazas are generating. The single storey shops and offices of property dealers have no front set-back at all, which also causes severe parking problems. In the original plan, 3.15% (441.81 kanal) area of the total scheme was allocated for commercial
activities, but after conversion along major roads the area under commercial land use has increased up to 5.67% of the total area.

Similar trend can also be observed in Faisal Town (Fig.3). However, because it is located away from the CBD, commercial activities in this planned residential neighbourhood are scattered and not highly concentrated at the moment. Still, total area under commercial land has reached 3.9% (140.55 kanal) from 1.02% (36.77 kanal) as provided in the original plan. It can safely be predicted that if this liberal policy of allowing conversion from residential to commercial land use continues, the concentration of commercial activities will jeopardize the calmness and tranquility of this residential neighbourhood too. The very nature of commercial establishments here is akin to those developed in Allama Iqbal Town.

These unplanned changes in land use from residential to commercial in all the three case study areas are already resulting in high traffic flow, consequent parking demand, traffic congestion, and air and noise pollution. Owing to such reasons, it has become extremely difficult to enter and exit from these residential areas during periods of peak traffic flow. Given this situation the LDA could have attempted to look back into the appropriateness of the land use allocation standards for commercial development and revise them for application at least in new expanding areas. But no interest was taken by the Authority to carry out studies to assess the appropriateness of these standards and hence the need to revise them was never felt. Recently, however, the government of Punjab has framed private site development schemes rules (2005) in which the land use allocation standards have been revised for commercial (from not more than 2% to 5% of total scheme area) and public buildings (from not less than 2% to 2-10% of total scheme area). It is not clear on what basis these standards have been revised and whether these would adequately cater for the future needs well or not, but this move should be welcomed and in fact may encourage also the revision of standards in case of public sector housing schemes.

Weak development control

Development control is weak and the LDA has been unable to effectively control the initiatives of developers involving change of land use from residential to commercial. One of the key reasons behind this situation, and as mentioned above as well, is severe shortage of staff faced by the Authority since long to effectively watch and control such conversions and unauthorized commercial development. Even in case of commercial plazas with approved plans, it has often been difficult for the Authority to ensure compliance with building by-laws for instance relating to parking space and set-back with limited field staff. Another reason for weak development control is simply the rapid pace of land use conversions. An official during the interviews stated: “People start commercial activities like shops and offices within their constructed houses without approval. Such conversions have been so rapid that it became difficult for the Authority to close down all such premises or take enforcement action and process large number of cases with limited staffing and resources.” The new Master Plan for Lahore (2004) also points this out that the trend of commercialization has been so heavy and rapid that the concerned authorities found it difficult to cope with. The easiest solution found (as discussed below in detail) was to ‘regularize’ commercialization activities throughout the city after charging a conversion fee. This step also made the life easier for the encroachers and for those responsible for unauthorised change of use and hence exacerbated the commercialization phenomenon.

Inappropriate Commercialization Policies of the Provincial Government

Effective enforcement by the LDA has in any case hardly been encouraged by the attitude of decision makers in provincial government towards unauthorized commercial development. During the late seventies it was observed that a large scale illegal conversion of residential properties into commercial uses was taking place in almost every part of Lahore. This trend was recognized by the provincial government as an important issue since there were hundreds of cases of similar nature and the new planned development and provision of commercial areas
was lagging far behind the demand in the wake of rapid increase in population of the city. Therefore, in order to resolve this issue, a short cut was adopted by taking decision to grant *post facto* approval in case of those properties already converted to commercial use on payment of a specific surcharge. This ‘feasible’ course of action to legitimize the illegal conversions by general public was given expression in the form of a commercialization policy first introduced in 1980 by the provincial government. Further, in order to ensure that no commercialization takes place without official approval in future, the policy also contained the provision to grant permission for change of use from residential to commercial on payment of fee at specified rate, and while imposing parking standards and set back requirements (which our survey indicates proved unrealistic). However, it was left to the discretion of the concerned development authority/local council to take decisions regarding plot size, set back and right-of-way of the roads where conversion would be allowed. For the applicant, it was made necessary to obtain NOC from the adjoining neighbours.

The first policy on commercialization was then replaced in subsequent years (1982, 1988, 1993, and 2001) by new policies with different changes only to provide legal cover to the conversions in planned housing schemes of development authorities, housing and physical planning department and unplanned areas under local councils in the Punjab province, though only after charging hefty fee. For instance, the commercialization policies (introduced between 1980 and 1988) proposed a fixed fee for commercialization at the rate of Rs. 0.1 million to 0.2 million per kanal. This was increased in 1993 from Rs. 0.2 million to 25% of the prevailing market rate for a commercial plot of similar size in the applicant’s area. The intention was to get due share from the enhanced market value of commercialized plots. Similarly, the 1993 policy introduced the provision allowing temporary commercialization for a maximum period of 10 years on payment of annual fee @ 3% of the permanent commercialization fee (that is 25% of the prevailing market rate).

The provincial government envisaged to solve the commercialization problem through these policies. But this approach contributed to further encouraging the change of use from residential to commercial. Even there have been problems with proper implementation of these policies. For instance, provision of parking space was required to be made by the plot owner in front of the proposed building and any parking proposal made in the basement was not acceptable. But practically it has been difficult to ensure that the plot owner comply with the parking standards and leave the requisite amount of space for parking in front of the shop. In fact, the parking standards at a flat rate (for example 1 car space per 1000 sq. ft covered area in case of shopping/office plaza) were applied which have no relationship either with the traffic attraction and generation potential of the category of commercial use or with that of the location.

Despite the above, no effort was made either by the provincial government or the development authorities to identify the root causes of large scale unauthorised commercialization, or make the commercial land use location and allocation standards more realistic, or identify measures to ensure planned provision of commercial activities. Instead, the old approach continued and a latest move in this direction has been made in 2004 with yet another commercialization policy. The 2004 policy is to legalize the commercialization activities in unplanned and old established areas under the control of Town/Tehsil Municipal Administrations (TMAs). The next section analyzes the current commercialization policies.

**CURRENT COMMERCIALIZATION POLICIES**

At present, two different commercialization policies are operating in Punjab. Commercialization in areas under the control of development authorities in the Punjab and provincial Housing, Urban Development and Public Health Engineering Department is being allowed under the Punjab Commercialization of Properties Rules, 2001. On the other hand, residential areas under TMAs are allowed to get commercial status under The Punjab Local Government (Commercialization) Rules, 2004. In the context of Lahore, it means that LDA is giving permission for change of use from residential to commercial in areas under its control (which are mainly housing schemes prepared by LDA as well as those private sector housing schemes approved by LDA) in the light of 2001 policy.
The City District Government Lahore (CDGL) and six TMAs on the other hand are allowing commercialization in their respective areas (which are mainly older built up residential areas) under the provisions of 2004 policy. In addition, a high level design committee has been constituted to deal with commercialization cases along certain primary roads under the 2001 policy. The committee is comprised of concerned officials from LDA, CDGL, TMAs, and some other line departments like Environment Protection Department Punjab.

The latest local government commercialization rules of 2004 are in more improved form as compared to those of 2001 currently followed by the LDA and other development authorities in the province (See Table-1). However, both these policies aim towards promoting and liberalizing the commercialization process. For instance, under the 2001 commercialization policy, illegal commercialization made anywhere in the city can be got approved after paying 10% surcharge. Similarly several major roads of Lahore have been declared commercial. Along these roads people have been invited to get their residential properties permanently converted to commercial after paying 20% of commercial value of the proposed plot as commercialization fee. For this purpose, even the NOC from neighbors is not required. Further, the interested person can deposit the fee in installments and those who will deposit the requisite amount of fee at once can avail 5% additional rebate on the fee. In other words, total commercialization fee has been reduced from 25% to 15% of commercial value of the plot as compared to the previous policies.

In case of temporary commercialization, uses like university, bus stand and hospitals etc. have also been allowed against annual fee at the rate of 3% of the prescribed commercialization fee with the conditions that no structural changes will be made in the existing building and parking will be provided within the premises. Furthermore, no time limit on the temporary status has been suggested as given in the previous policies. Temporary commercialization can also be made on roads other than those declared for commercialization, for instance, even on the inner streets of a housing scheme. However, if these streets are declared approved for commercialization later on, the temporary status of a commercial use can also be got converted to permanent status. This situation is already resulting in establishment of all sorts of commercial activities like private sector universities, colleges, hospitals, private and government offices etc. along narrow residential streets. Similarly, most of the streets linking primary roads of Lahore have become highly unhealthy and dangerous for habitation.

All these kinds of provisions and conditions of the commercialization policies are only going to further encourage haphazard commercialization instead of bringing any positive change in the spatial structure of Lahore. Are the regulators sensitive to these likely implications of the commercialization policies and how they view this important issue? The next section provides answers to these questions.

**POINT OF VIEW OF THE REGULATORS**

The officials of Lahore Development Authority dealing with building and development control and the commercialization process in its housing schemes were interviewed to seek their views on the causes and problems of commercialization. All the officials interviewed agreed that major causes of commercialization are inadequate provision of planned commercial areas, ever increasing public demand for economic activities, inappropriate standards and lack of expertise in forecasting the future demand for variety of commercial uses.

The interviews revealed that there is no technical criterion or consideration of possible adverse environmental impacts of allowing commercialization along a road. The decision of declaring a road approved for commercialization is mainly based on predominant commercial use already flourished there mainly without official approval, the demand of investors, and subjective judgment regarding appropriateness of the right-of-way of road.
<table>
<thead>
<tr>
<th>Attributes</th>
<th>Punjab Commercialization of Properties Rules, 2001 applicable in areas under LDA</th>
<th>The Punjab Local Govt. (Commercialization) Rules, 2004 applicable in areas under TMAs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scope</strong></td>
<td>Whole Punjab except areas under Cantonment Boards.</td>
<td>Whole Punjab in Areas of TMAs and City Distt. Govt. except areas under Cantonment Boards, development authorities, HUD&amp;PHE Deptt.</td>
</tr>
<tr>
<td><strong>Type of Commercialization Allowed</strong></td>
<td>Permanent along 40 roads declared as commercial other than those declared as general commercial areas. Temporary anywhere in the city with no maximum time limit. Also, already established illegal/unauthorized can get approval. Partial commercialization not allowed but where already exists can be regularized on payment of fee.</td>
<td>Permanent only along roads to be declared commercial and not allowed in individual cases. Temporary same as in LDA but for a period not exceeding one year and hence need fresh renewal every year. Illegal / unauthorized same as in LDA but only along declared roads. Partial commercialization same as in LDA.</td>
</tr>
<tr>
<td><strong>Site/ Parking Requirements</strong></td>
<td>Front building line min.10’ to max.30’ regardless of plot size. No indication of parking requirements for permanent commercialization but in case of high-rise building parking to be provided @ 1 car space/ 1000 sq.ft. covered area. Parking to be provided within the building premises in case of temporary commercialization.</td>
<td>Front building line min.10’ to max.20’ regardless of plot size. In case of high-rise building, parking requirements will be given due consideration. For temporary commercialization same requirement as by LDA.</td>
</tr>
<tr>
<td><strong>NOC Requirement</strong></td>
<td>NOC not required along declared roads. Required for temporary commercialization if located along roads/streets other than declared.</td>
<td>Same as by LDA.</td>
</tr>
<tr>
<td><strong>Commercialization Fee</strong></td>
<td>For Permanent @ 20% of commercial value of land along the road concerned (If to be paid in installments), but if paid at once then @15%. For Temporary @ 3% of the fee for permanent per annum. For established illegal commercialization @ prescribed fee plus 10% surcharge.</td>
<td>For permanent and temporary, same as charged by LDA. Same for established illegal commercialization but without surcharge. For established partial on the basis of area coverage. Fee collected shall be deposited in separate head of account and utilized for roads widening, and development of infrastructure in proximity of commercialized land/buildings.</td>
</tr>
<tr>
<td><strong>Exemption / Fee Concession</strong></td>
<td>For NGOs, trusts, cultural organizations and museums fee can be waive off. But, Education, health and IT related institutions are given 50% concession.</td>
<td>For charitable NGOs only on conversion of land use on annual basis.</td>
</tr>
<tr>
<td><strong>Approval procedure</strong></td>
<td>Application to be made on plain paper with copy of NIC and proof of ownership. Concerned Commercialization Committee of Development Authority or local council to grant approval. No time limit for approval indicated.</td>
<td>Application to be made to the commercialization committee with copy of NIC, documents of title, site plan, NOC (if required) from any other government agency. No time limit for approval indicated.</td>
</tr>
</tbody>
</table>
Public objections are invited before approving a road merely because it is a legal requirement to get rid of the condition of NOC from the neighbours of every property. But all the objections are generally rejected without assigning valid reasons. For instance, the objections raised by those who do not live along the concerned road but pass through it are straight away rejected by declaring them as irrelevant. In such a situation it is incomprehensible to expect sustainable commercial development. As a matter of fact, nearly all the concerned LDA officials interviewed for this study do acknowledge that the commercialization policies of the provincial government have many flaws. For instance, permission can still easily be obtained for temporary conversion of a house into a school located along a 30 feet wide and 300 meters long street already having two schools simply by providing no objection certificate somehow from adjacent house owners and depositing 3% of commercialization fee per annum. This is what actually happening in many residential areas of Lahore. One can very well imagine the resultant traffic and parking mess created in such a street.

Interviews with the officials of the Authority revealed that no money is spent out of funds raised through commercialization fees on provision of parking facilities or improvement of utility services along commercialized roads. In fact, heavy fees collected from the developers in lieu of permission to change the use from residential to commercial have proved invaluable in meeting the financial needs of the Authority. Over the years, commercialization fees have become a major source of revenue and the funds so raised have been helpful in paying staff salaries and meeting other expenditures of the Authority. Since no grant or budget is provided by the provincial government to undertake development works and meet administrative expenditures, the Authority’s survival now depends much upon the funds raised through commercialization fees. Thus it is not hard to understand why the Authority is unable to feel real concern and ponder on the implications of commercialization policies in the long run and take effective measures to meet the demand for commercial uses in a more sustainable way.

CONCLUSIONS

The analysis presented above shows that haphazard commercialization is resulting in acute parking problems, traffic congestion and adverse environmental impacts in the residential areas of Lahore. Failure to consider the root causes of haphazard commercialization and inadequate implementation of master plans prepared for Lahore in different years has led to mush-rooming of commercial activities in nearly all part of the city. The government has been attempting to regulate commercial development by formulating commercialization policies. But these have proved counter productive and contributed to encouraging rather than discouraging unplanned commercialization. Instead of continue following these commercialization policies, there is a dire need for formulation of a coherent strategy capable of meeting the demand for commercial uses without affecting the environmental quality of residential areas.

As a part of the strategy, there is clearly a need first to ensure that no further unplanned commercial areas are encouraged to emerge and flourish. This may involve announcing a cut off date for commercialization, like the one fixed in case of katchi abadis and strictly dealing with conversions that are done after the cut off date. For effective implementation this in turn will require strengthening of planning agencies in terms of trained staff and resources. Further commercialization along roads already declared for this purpose should only be allowed keeping in view the opportunities for meeting parking needs and potential to manage increased traffic load.

In order to meet the future needs for commercial areas, the new master plan for Lahore should incorporate alternative policy measures aimed at meeting these needs in a planned manner according to the principle of sustainability. These policy measures should be based on detailed analysis of the trends of commercialization and a realistic assessment of the future needs particularly for higher order commercial activities.

As far the commercial land use allocation standards for housing schemes, these have clearly proved inadequate. The government of Punjab appears to have recognized this and has recently raised the standards under the new
private site development schemes rules 2005. It may be expected that similar standards in case of public sector housing schemes will be followed. But whether these standards would adequately cater for the future needs adequately or not is yet to be seen. In fact commercial land use allocation standards should be devised on the basis of a range of factors such as location of housing scheme with respect to future growth of city, nature of surrounding development, socio-economic status of target group, and household size. In particular, the calculations for design population should consider two households per plot as opposed to current practice of assuming one household per plot. This is suggested in view of the fact that generally more than 60% houses in fully colonized housing schemes accommodate two households on average with owners occupying one floor and the tenant the other floor.

The standard for provision of parking spaces are also unrealistic and do not have any relation with the nature and location of commercial activities. To this end, detailed parking demand surveys are required to be carried out along all the major commercialized roads of the city particularly with respect to traffic attraction and generation potential of every type of commercial activity. The findings of these surveys could be used not to revise the existing parking standards and make them more realistic but also for suggesting measures to resolve parking problems already gaining serious proportions along commercialized roads. Wherever appropriate, multi-storey parking plazas along such roads may be constructed possibly through joint venture with the private sector.

The issues relating to commercialization are numerous and multi-dimensional. The way this phenomenon is already creating mess particularly in terms of traffic and environmental problems in metropolitan cities in Pakistan including Lahore warrants serious attention now. Only with this spirit to take immediate actions today will help us to lead the path into the future to achieve sustainable commercial development thus saving the spatial structure of our cities and maintaining environmental quality of residential areas.

REFERENCES