

THE ASSOCIATED CHAMBERS OF COMMERCE AND INDUSTRY OF INDIA

D S RAWAT

Secretary General

November 15, 2011

Respected Shri Kamal Nath Saheli

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**ASSOCHAM SUGGESTIONS FOR
MID – TERM REVIEW OF MASTER PLAN FOR DELHI – 2021**

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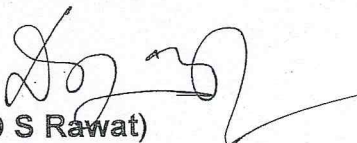
Kindly refer to the DDA Advertisement inviting public suggestions for Mid –Term review of Master Plan for Delhi (MPD-2021) informing that this review is being undertaken to provide realistic Mid – Term corrections and modifications in the Master Plan Policies, Norms / Standards and the implementation procedure, etc to suit the changing needs of the Society.

In this context, we are enclosing a representation suggesting modifications in certain provisions and specific aspects of the plan.

We shall be grateful if our suggestions are considered during the process of mid-term corrections of the Master Plan for Delhi-2021.

Looking forward to hearing from you and with kind regards,

Yours sincerely,


(D S Rawat)

**Shri Kamal Nath
Hon'ble Union Minister for Urban Development,
Nirman Bhawan
New Delhi 110011**

**SUGGESTIONS FOR
MID-TERM REVIEW OF MASTER PLAN FOR DELHI - 2021**

THE ASSOCIATED CHAMBERS OF COMMERCE AND INDUSTRY OF INDIA

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Issues and Suggestions pertaining to Mid-term review of Master Plan of Delhi 2021:

S.N O.	ISSUES	SUGGESTION
1	<p><u>Modifications in Development Code:</u></p> <ul style="list-style-type: none"> - Medical Facilities - Basements - Conservation of resources - Requirement of revision of Approved Layout 	<p>There should be abundant hospital facilities in zones where people live and work. The number of beds should be a function of the available plot size, catchment area, population, external patients and the planning of the hospital facilities. The provision restricting number of beds to 100 in use zone PS should be done away with.</p> <p>The city needs more parking provision. Sub clause 8 (5) (a) should be amended by deleting the words "maximum equivalent to" and replacing by "for" because the existing provision is a deterrent to providing parking beyond the mandatory requirement of ECS.</p> <p>It is impossible to understand and interpret this provision under sub clause 8 (5) (b) because of the contradictory words "above" and "flush". In the present day scenario basements are mechanically ventilated and artificially lit and should be flush with the ground.</p> <p>Para 8 (5) (d) is also unnecessarily restrictive when it stipulates that, "In case the basement is used for activity in conformity with the use premises, wherever permitted," is ambiguous and "wherever permitted" should be deleted because "in conformity with the use premises," is already a precondition. Thus dual restriction has no meaning.</p> <p>Sub-Clause 8 (2) – The condition of "(as part of Approval of Layout plan...) is a restrictive stipulation, as change in Development Control Norms allowing a particular use premise on an individual plot does not require any change in the Approved Layout Plan. Hence, it is</p>

	<p>Plan:</p> <p>- Service Floors:</p> <p>- ECS Norms</p>	<p>proposed that no amendment in Approved Layout Plan should be required in case the individual plots qualify for the use premises/activities as per the Development Control Norms in force in MPD 2021.</p> <p>It is suggested that service floor wherever provided should be free of FAR. Tall buildings need multiple service floors to facilitate fire fighting, pressure reducing tanks for water supply, signal boosters for communications etc. Hence should be free from FAR based upon the feasibility and requirements of services.</p> <p>As per Development Control Norms of a particular use premise, huge basements are required to be constructed to meet the present ECS requirement. Today, the average size of the car parking lot has shrunk to 2.3m x 4.5m for small cars which constitute majority of car parking needs of a use premise. Hence creating a basement bigger than required is a wasteful expenditure.</p> <p>Similarly in several smaller projects the actual car parking lots in their basements are less than the ECS requirements.</p> <p>Hence it is suggested that the car parking should either be permitted as per ECS requirement or actual car parking lots (average size of 2.3m x 4.5m each and average driveway width of 5.5m), whichever is more.</p>
2	<u>Benefits of redevelopment guidelines to other industrial plots</u>	<p>The benefits of additional FAR and removal of height restrictions as envisaged in the "Regulations and Guidelines for Redevelopment of Existing Planned Industrial Areas" issued on April 1, 2011 should also be extended to the other approved authorized Industrial plots which are not part of Planned Industrial Areas.</p>
3	<u>Influence zone along MRTS &</u>	<p>It will be a more practical and useful idea to have an influence zone within a radius of 1 km. from the major transport hubs i.e. metro</p>

	<u>major transport corridor</u>	<p>stations and major bus terminals etc.</p> <p>Besides, distance needs to be measured from the transport hub and not from the route per se because the commuters have to walk up to the station and not to a point on the route.</p> <p>The MPD 2021 allows an incentive F.A.R. with a cap of 400. This implies that the incentive F.A.R. for re-densification along the major transport hubs will be available over and above the all other possible F.A.R. incentives, subject to a cap of 400. This needs to be firmly stated in the policy document to avoid conflicting interpretations by different agencies which, often, defeat the very purpose behind the policy.</p> <p>In case of large schemes, block/ pocket boundary should be considered as one scheme for this purpose". To cover maximum number of eligible plots under the scheme, it would be advisable to include all the plots with 50% the area inside the influence zone.</p>
4	<u>Atrium in Commercial and residential buildings</u>	<p>The sky light on top of atrium should not be mandatory and the coverings of atrium by floors/slab should also be allowed as per architectural design requirement. This will facilitate provision of multiple atrium spaces appropriately distributed throughout the height of the tower structure at multiple floors.</p> <p>The provision of Atrium, may be 100 Sqm or 2% extra ground coverage and free of FAR, whichever is more, should be given to Residential Group Housing projects also. Any extra area provided in these atria, which is more than required as per above stipulations, can be counted towards Ground coverage and FAR.</p>
5	<u>Areas free from FAR:</u> -Staircase and	<p>By providing these as free of FAR areas, the designer may provide more generous corridors & staircases without sacrificing usable FAR. Staircases and Corridors are provided as free of FAR in Kolkata &</p>

	<p>Corridors:</p> <p>-Service areas on Ground, Upper & Terrace floors</p> <p>-Swimming Pools</p> <p>-Architectural features:</p>	<p>Mumbai.</p> <p>As services areas in basements are free from FAR, service areas on ground, upper and terrace floors should also be allowed free from FAR.</p> <p>For group housing needs, there should not be any restriction on area or numbers of swimming pool.</p> <p>Architectural features in a building, as approved by DUAC, should be permissible free of FAR, ground coverage and height restrictions.</p> <p>Balconies upto 1.2 mts width are allowed free of F.A.R. at present. This is not enough and should be increased upto 1.8 mts in case of high rise group housing, as this is the only open space available to the residents in their apartment. Double height balconies upto 100 Sqft in size should also be free from FAR (DDA allows this provision but MCD does not permit it).</p> <p>Delhi Building Bye-laws allow one Guard room of maximum area of 4.5 Sqm to be built free of FAR. Keeping in view the increasing security concerns, there is a need for more guard rooms and related facilities hence should be permissible free from FAR.</p> <p>Similarly, canopy over the main entrance of a building is permissible upto a size of 2.4 m x 4.5 m free from FAR. This restriction should be removed as complexes are getting bigger day by day and there is an intrinsic requirement of providing canopies over multiple entrances of a building complex.</p>
6	<p><u>Stilts: no restriction of height, extended upto setback lines and multi level</u></p>	<p>The restriction of 2.4 mts height of stilt is impractical as modern day vehicles like SUVs with carrier on top cannot be accommodated in this height after taking into account beams and services.</p> <p>While stilt is allowed with max 2.4 mt heigh, the ground floor height is to be minimum 2.75 mt. This create a lot of problems in structural design of the building as there is a level difference between roof</p>

<p><u>Enhancement of additional floor area for community/recreational hall and senior citizens recreation room</u></p>	<p>slabs of stilt and adjoining ground floor. In order to negotiate this level difference, an extra slab needs to be cast, which becomes unviable in large schemes.</p> <p>If the objective of 2.4 m is to avoid misuse, then the example of basements should be seen, which are meant for parking and have no restriction of minimum height. This will facilitate parking of bigger vehicle and would also create possibility of provision of mechanical parking, wherever required.</p> <p>There should not be any restriction in providing these additional areas in more than one 'Community Centres' within the same plot of group housing, in order to adequately distribute these facilities, in large plots. The restriction of 400 sq mt should be replaced with "percentage of the F.A.R." say 5-7% of F.A.R. of the group housing scheme. Similarly, restriction of 100 sq mt for senior citizen recreational facilities should be replaced with 1-2% of F.A.R. These kind of facilities can be provided in the form of a "Community Club" which is demand of modern group housing schemes.</p>
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1. SUGGESTIONS REGARDING CHAPTER 17 : DEVELOPMENT CODE

In addition to dwelling upon policy matters and development control norms, there are certain specific provisions in Chapter 17: Development Code of MPD 2021 which are currently ambiguous or are not conducive to development or cannot be implemented.

A. MEDICAL FACILITIES:

Augmenting medical facilities is a major need not only for the capital's ever growing population but also because Delhi will always be the referral city for a large part of North India.

Keeping this in view, we find Table under 8 (2) S.No. PS (i) is not helpful because there is no apparent rationale for restricting the number of beds to 100 for Use Premise Hospital in Use Zones RD, C₁ and PS and for NP in Use Zones C₂ and M. There should,

in fact, be abundant hospital facilities in zones where people live and work. In any case the relevance of Use Zone M is much diluted because of Table 7.3 Note vi. The number of beds should be a function of the available plot size, the catchment area and its population, expected external patients and the planning of the hospital facilities.

Furthermore, there is a major anomaly in this table because hospital beds are restricted to 100 even in Use Zone PS. If there continues to be such a restrictive provision in Use Zone PS, where will larger hospitals be located? This is a further illustration of the need to do away with the cap on beds and leave such parameters to the dynamics of this very important public/semi-public usage.

B. BASEMENTS:

In modern buildings basements are an essential component for locating services and parking and there should not be any impediment to their construction. There is severe pressure of providing adequate parking spaces in all use premises and spilling over of parking on public roads is a common phenomenon. Moreover, open area inside a plot should be maximized for internal circulation and landscaping.

If a developer/promoter wishes to provide parking beyond the mandatory requirement of ECS, MPD 2021 should not be restrictive. But this is not so because Para 8 (5) (a) states "Basements up to the setback line maximum equivalent to parking and services requirement.....". This is interpreted as limited to the mandatory ECS requirement and that too the net ECS after counting open parking. To prevent reduced green areas, open parking should largely be for incidental parking and emphasis has to be on basement parking.

Since parking in Delhi is a major problem and to facilitate provision of additional parking, Para 8 (5) (a) should be amended by deleting the words "maximum equivalent to" and replacing by "for" because the existing provision is a deterrent to providing parking beyond the mandatory requirement of ECS.

Providing basements should not affect the functioning or the form or aesthetics of a building. This principally means the top of basements should be flush with the surrounding ground level and this should be stated unambiguously. But this, again, is not so because Para 8 (5) (b) states "basement(s) above the plot level shall be kept flushed with the ground..." It is impossible to understand and interpret this provision because of the contradictory words "above" and "flush". In the present day scenario basements are mechanically ventilated and artificially lit and should be flush with the ground. The basement roof below the building can be raised according to specific requirements of design, engineering, site contours, surface runoff, accessibility etc. and need not be limited to minimum 900 mm to maximum 1200 mm height as per present practice being followed by the local bodies.

In certain usages it may be desirable to use basements for activities other than services and parking. These other uses would count towards FAR but MPD 2021 should facilitate this requirement which it currently does not because Para 8 (5) (d) states "In case the basement is used for activity in conformity with the use premises, wherever permitted," is ambiguous and "wherever permitted" should be deleted because "in conformity with the use premises," is already a precondition. Thus dual restriction has no meaning.

C. CONSERVATION OF RESOURCES:

Reducing capital costs, operating costs and energy costs must be of primary concern and needs attention. One step towards achieving this objective would be sharing the services like air-conditioning; grid & DG power facilities & distribution; water treatment; sewage treatment and any specialised services between adjoining buildings if the owners agree to do so. MPD 2021 must facilitate this by allowing services ducts/tunnels below ground or overhead bridges with stipulated height clearance. Such connections will necessarily cut through setbacks but the functional need of the setbacks will not be compromised.

Such a provision will bring about economy of scale, conservation of power, lower carbon footprint etc. and is the need of the time due to environmental considerations. In fact in

other countries, basements of properties are not only connected with the adjoining properties but also extend below the public roads and thus whole development becomes homogenous, which benefits the city (NDMC is considering district cooling in Connaught Place) and can be added to Chapter 17.

D. REQUIREMENT OF REVISION OF APPROVED LAYOUT PLAN:

As per Sub-Clause 8(2) *PERMISSION OF USE PREMISES IN USE ZONES (As part of approval of Layout Plan or as a case of special permission from the Authority)*, local bodies are not allowing use premises /activities on individual plots which qualify for that particular use premise as per the Development Control Norms in force, as per MPD 2021, without modification in Approved Layout Plans. This is an restrictive stipulation, as change in Development control norms allowing a particular use premise on an individual plot does not require any change in the Approved Layout Plan.

Hence it is proposed that the line within the bracket of above-mentioned sub-Clause 8(2) should be removed, or, no amendment in Approved Layout Plan should be required in case the individual plots qualify for the use premises/activities as per the Development Control Norms in force in MPD 2021.

E. SERVICE FLOORS:

As per clause 8(3) 2, the mezzanine floor and service floor wherever provided shall be considered as a part of the total FAR.

The service floors are crucial requirement of high rise buildings and are provided for efficient management of building services and for diversion of services where usage at lower floors is different from the upper floors. These floors are to be made of non-habitable heights. By taking them in FAR, their use has been restrictive and would add to the cost of services. For very tall buildings multiple service floors will be required for facilitating fire fighting, pressure reducing tanks for water supply, signal boosters for communications etc.

Therefore it is suggested that service floor wherever provided should be free of FAR. For very tall buildings multiple service floors will be required for facilitating fire fighting, pressure reducing tanks for water supply, signal boosters for communications etc. These

should also be permitted free from FAR based upon the feasibility and requirements of services.

F. ECS Norm:

MPD 2021 has revised ECS norms upwardly across all the use premises. This has been done to address the need to provide on-site car parking for ever increasing numbers of cars in the city of Delhi. Moreover, large projects are being implemented particularly in residential, commercial and industrial use premises.

As per MPD 2021, in Clause 8(5)(a) of Chapter – 17 DEVELOPMENT CODE, "Basement(s) up to setback line maximum equivalent to parking and service requirements..... could be permitted and not to be counted in FAR". In larger schemes the ECS requirement as per Development Control Norms of a particular use premise is such that huge basements are required to be constructed to meet the ECS requirement, while actual car parking lots accommodated are more than the ECS numbers. Now a days the average size of the car parking lot has shrunk to 2.3m x 4.5m for small cars which constitute the majority of car parking needs of a use premise. Hence creating a basement bigger than required is a wasteful expenditure.

Similarly in several smaller projects the actual car parking lots in their basements are less than the ECS requirements.

Hence it is suggested that - the car parking should be permitted either as per ECS requirement or actual car parking lots (based upon an average size of each lot as 2.3m x 4.5m and average driveway width of 5.5m), whichever is more. This provision will even out both the situations explained above.

2. BENEFITS OF REDEVELOPMENT GUIDELINES TO OTHER INDUSTRIAL

PLOTS:

The Govt. Of India, vide Gazette notification dt. 01 April 2011, has notified the "Regulations and Guidelines for Redevelopment of Existing Planned Industrial Areas." These are applicable to Industrial plots which are part of approved layout plans of various industrial areas. There are several Industrial plots which do not fall in any approved Layout Plans but these are approved authorized Industrial plots. The above referred regulations and guidelines are not applicable to these Industrial plots.

Therefore, it is suggested that – The benefits of additional FAR and removal of height restrictions as envisaged in above mentioned Regulations and Guidelines, should be extended to the other approved authorized Industrial plots which are not part of Planned Industrial Areas.

3. INFLUENCE ZONE ALONG MRTS & MAJOR TRANSPORT CORRIDOR:

MPD 2021 envisages creation of an Influence Zone comprising a "maximum upto 500 metres wide belt on both sides of centre line of the MRTS/ Major Transport Corridor". Para 3.3.1.1. Of the MPD categorizes this Influence Zone as an "Intensive Development Zone", with higher F.A.R. and height. The Guidelines for Redevelopment Schemes laid down in Para 3.3.2 also specify that in such a zone, standards of housing density can also be relaxed, wherever justified.

This one provision in the MPD 2021 can release sizeable supply of urban usable land by ensuring optimum utilization of land along the MRTS network. This will contribute to urban regeneration and will go a long way in significantly reducing the pressure on land for the ever increasing demand for residential and commercial space in a megapolis like Delhi.

However, the first step towards this avowed objective would be the identification and notification of the said 'Influence Zone' by Delhi Development Authority. Towards this end, the following is of material importance:

- A. Major transport corridors, including both existing and proposed metro routes, are a matter of public knowledge. It is quite clear that re-densification along the present transport corridors, including the metro route would be a planner's nightmare.
- B. MPD 2021 considers 15 minute walk to the metro station as the norm (Para 12.4), which means a distance of about 1 km. Most of the studies on optimum walking distance to reach a transport hub treats a distance of 500 to 800 meters as optimum distance for the purpose. However, most of this data is based on the research done in the west. In context of the city of Delhi, it may be reasonable to assume the optimum distance at the higher side of this band at 800 metres.

- C. In view of the two submissions made above, it will be a more practical and useful idea to have an influence zone within a radius of 1 km. from the major transport hubs i.e. metro stations and major bus terminals etc. Distance needs to be measured from the transport hub and not from the route per se because the commuters have to walk up to the station and not to a point on the route.
- D. The MPD 2021 allows an incentive F.A.R. with a cap of 400. This implies that the incentive F.A.R. for re-densification along the major transport hubs will be available over and above the all other possible F.A.R. incentives, subject to a cap of 400. This needs to be firmly stated in the policy document to avoid conflicting interpretations by different agencies which, often, defeat the very purpose behind the policy.
- E. Para 3.3.1.1 of the MPD 2021 also lays down that "Entire approved layout plan of a scheme will be included in the zone if more than 70% of the plan area falls inside the influence zone. In case of large schemes, block/pocket boundary should be considered as one scheme for this purpose". To cover maximum number of eligible plots under the scheme, it would be advisable to include all the plots with 50% the area inside the influence zone.

Therefore, necessary guidelines may be issued to implement the mandate given by MPD 2021 for creating influence zone along the MRTS/ Major Transport Corridors. However, such guidelines may take due cognizance of the situation on the ground and include certain modifications as suggested above.

4. ATRIUM IN COMMERCIAL AND RESIDENTIAL BUILDINGS:

In MPD 2021, atrium has been allowed in Commercial Centers and Hotels with 10% extra ground coverage. It is a welcome initiative as it has given an opportunity to provide an ambience to commercial centers.

DDA Technical Committee, vide it's meeting dt 16 January 2008 has permitted the use of skylights over these atrium spaces. It has also recommended that the MPD 2021 should be

amended to make this provision. The amendment to the MPD 2021 is still pending. Hence the following is suggested to further improve this initiative undertaken in MPD 2021:

As per the amendment of Table 5.4 of MPD 2021 Development Controls, Commercial Centres, the provision of skylight on top of the atrium has been made mandatory. Also no floor/activity is permitted over the top of the atrium.

However, there is flexibility of deciding the maximum height as per architectural design requirement.

It is suggested that the sky light on top of atrium should not be mandatory and the coverings of atrium by floors/slab should also be allowed as per architectural design requirement. This will facilitate provision of multiple atrium spaces appropriately distributed throughout the height of the tower structure at multiple floors. Functionally, an atrium is provided in commercial (particularly retail and hotels) for creating a focal point. In larger developments, these focal points can change after every few floors and in such cases there will be solid roofs over these atria.

Provision of slabs/floors over the atrium instead of glass sky-light reduces the heat load for air-conditioning which makes the building more energy efficient. In any case, virtually all such buildings are artificially lit and mechanically ventilated.

Also as per the MoEF requirement, the usage of glass/glazing is restricted to 40% of the envelope area of the building. By providing glass over atrium, a lot of permitted glass area is consumed in atrium roof which results in reduction in the external glazing area of habitable/usable areas of the building which results in less natural light and increases power consumption for artificial lighting provisions. Light form Glass covered atria falls only on common areas (that too up to certain floor depths from top) and not "work" areas which needed higher lighting levels

In MPD 2021, due emphasis is given for augmenting the housing shortfall. To fulfill this demand large number of housing projects of different categories including high-rise & better residential experience will be coming up in the near future.

To give a better quality and facility to the large number of residents of these group housings in terms of common areas, the provision of Atrium may be 100 Sqm or 2% extra ground coverage and free of FAR, whichever is more, should be given to Residential Group Housing projects also. Also any extra area provided in these atria, which is more than required as per above stipulations, shall be counted towards Ground coverage and FAR.

5. AREAS FREE FROM F.A.R.:

The MPD 2021 makes provision of certain areas to be given free from FAR. Some provisions are allowed free from FAR as per Delhi Building Bye-Laws. There is further scope of increasing this list which would result in better provision of services and facilities in various buildings.

Some of the suggestions are as following:

- A. Staircases and Corridors - In a high rise building, the fire exit route / corridor leading to the staircases are crucial areas for safety of occupant's life. Presently both these areas, staircases and corridors/ route leading to them, are counted in FAR because of which invariably these are provided to the minimum dimensions as per NBC/ bye-laws, to maximize the usable FAR. If these are provided as free of FAR areas, the designer gets the flexibility of providing more generous corridors & staircases without sacrificing usable FAR. In some cities like Kolkata & Mumbai, it is already provided as free of FAR.
- B. Service Areas on Ground, Upper and Terrace Floors – In modern high rise buildings, the requirements of services are such that these are mandatorily have to be provided on Ground, upper or terrace floors. The services areas in Basements are free from FAR. Hence this logic should be extended to Service areas on ground, upper and terrace floors also, and all the service areas on ground, upper and terrace floors should be allowed free from FAR.
- C. Swimming Pools –
 - a. MPD 2021 has stipulated provision of swimming pool in Group Housing projects as per table 4.3.
 - b. Further as per clause 13.3.3 (i) "To incentivise development of sports facilities and swimming pool (upto maximum 100 Sqm) within group housing areas, schools, clubs etc. Shall not be counted towards ground coverage and FAR."
 - c. Moreover, as per table 13.17 'Development Control of Other Community Facilities', Notes (iii), "In the open area apart from outdoor games/ sports

facilities, swimming pool would be permissible upto a area of 300 Sqm free from ground coverage."

- d. As per the demand of group housing schemes, there should not be any restriction on area or numbers of swimming pools that are permissible in a group housing scheme. These swimming pools are to be allowed free from FAR and ground coverage, as these would be a part of common community facilities of the residents. These should be allowed as part of the overall landscape scheme.

D. Architectural features –

- a. These are provided to enhance the visual aspect of habitable spaces and serve no functional purpose. Hence all the architectural features in a building, as approved by DUAC, should be permissible free from FAR, ground coverage and height restrictions.
- b. Balconies are available free from FAR upto 1.2 mts width in group housings. This 1.2 mts width is not enough in case of high rise group housing, as this is the only open space available to the residents in their apartment. In order to increase the usability of the balcony the width should be allowed upto 1.8 mts free from FAR. Similarly, in high rise group housing buildings, double height balconies upto 100 Sqft in size should be free from FAR which would be a boon to the residents (DDA already allows this provision but MCD does not permit it).
- c. For security purposes, guard rooms are a essential requirement of modern buildings. Delhi Building Bye-laws allow one Guard room of maximum area of 4.5 Sqm to be built free from FAR. Keeping in view of security concerns the required number of guard rooms and related facilities should be permissible free from FAR.
- d. Similarly, canopy over the main entrance of a building is permissible upto a size of 2.4 m x 4.5 m free from FAR. This restriction should be removed as buildings are getting bigger day by day and there is an intrinsic requirement of providing canopies over multiple entrances of a building.

6. STILTS PROVISIONS

In Chapter-17: Development Code of MPD 2021, in Clause 8 (3), General Notes 3. *"If the building is constructed with stilt area of non-habitable height (2.4 mts.) and is proposed to be used for parking, landscaping etc. The stilt floor need not be included in FAR."*

In high rise building, this provision poses following constraints –

- The restriction of 2.4 mts height of stilt becomes impractical as modern day vehicles like SUVs with carrier on top cannot be accommodated in this height after taking into account beams and services.
- While stilt is allowed with max 2.4 mts height, the ground floor heights are to be minimum 2.75 mts. This create a lot of problems in structural design of the building as there is a level difference between roof slabs of stilt and adjoining ground floor. In order to negotiate this level difference, an extra slab needs to be cast, which becomes unviable in large schemes.
- No service areas are allowed in stilts, free from FAR.
- Moreover the stilts below a building provide a big relief at eye level in terms of views and openness.

In modern high rise buildings, the requirements of parking and services are of such a magnitude that, these restrictions make provision of stilts restrictive. Hence the objective of providing stilts is diluted.

It is suggested that –

- A. The height restriction for stilt floors should be removed and should be equal to one floor height (equal to ground floor height if ground floor and stilts are given side by side). If the objective of 2.4 m is to avoid misuse, then the example of basements should be seen, which are meant for parking and have no restriction of minimum height. This will facilitate parking of bigger vehicle and would also create possibility of provision of mechanical parking, wherever required.
- B. The stilt floor should be allowed to be extended beyond building footprint, maximum up to the setback lines (same as basements) as 'Podium'. Over the top of extended stilt floor, landscaping and surface parking should be allowed.

- C. Multi level 'Podium' should be allowed which would reduce the requirements of basements and would be cost effective and easy to monitor.
- D. Stilt or 'Podium' should be used for parking, landscaping and services (free from FAR).

**7. ENHANCEMENT OF ADDITIONAL FLOOR AREA FOR COMMUNITY/
RECREATIONAL HALL AND SENIOR CITIZENS' RECREATION ROOM IN
GROUP HOUSING PROJECTS**

As per MPD 2021, Clause 4.4.3. B Residential Plot- Group Housing, (iii), "Additional floor area up to a maximum of 400 Sqm shall be allowed to cater to community needs such as community/recreational hall, crèche, library, reading room and society office. In addition to above, 100 Sqm area shall be permissible for Senior Citizen Recreation Room."

This provision has been done in order to ensure that all group housing schemes should have community facilities for improving the life style of the society and to address the need for these facilities within the group housing scheme. These kind of facilities can be provided in the form of a "Community Club" which is a demand of modern group housing schemes.

The area of these community facilities has been stipulated as a fixed figure, irrespective of size of the group housing plot. Similarly, activities permitted have also been restricted as mentioned above. In large plots of group housing schemes these fixed areas pose a great constrain in fulfilling the objective of these facilities and remain highly disproportionate to number of residents of these large group housing schemes.

Clause 4.4.3. B of MPD specifies minimum size of a Group Housing Plot as 3000 Sqm. The additional areas specified for Community facilities, are adequate for the residents of Group Housing on this size of plot, which amounts to 6.67% for Community/recreational facilities and 1.67% for Senior Citizens Recreation Room in terms of floor area (with FAR of 200 on 3000 Sqm plot).

Therefore it is suggested that:

1. These additional areas should be allowed as "Community Clubs", in terms of percentage of Group Housing FAR, such as 5-7% floor area for Community recreational facilities and 1-2 % for Senior Citizens recreational facilities of the total Group Housing FAR.
2. There should not be any restriction in providing these additional areas in more than one 'Community Clubs" within the same plot of group housing, in order to adequately distribute these facilities, in large plots.
3. There should not be any restriction on type of activities in these "Community Clubs" till the time those activities are for community recreational purposes, and should permit at least those which are permitted for "Community Recreational Club" as per table No. 13.27 of MPD 2021 for "Socio-Cultural and Community Facilities".