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KARJAT-KHALAPUR-KHOPOLI

To,

**Shri Sunil Rathod**

Chief Engineer (Development Plan),  
Brihanmumbai Mahanagarpalika,  
5th floor, Annexed Building, Mahapalika Marg,  
Fort, Mumbai- 400001.



29710P

**Subject: Suggestions / Objections for Proposed Modification to the Regulation  
41(2) of DCPR 2034 u/s 37(1) of M.R. & T.P. Act**

Dear Sir,

With respect to above notification, we would like to submit the suggestions / objections as stated below.

Clause No.	Proposed modification as per Notification	Suggested Clause	Reasoning
Common Title of Column 7 & 8	Side and rear marginal open space for Commercial building deriving Artificial Light and mechanical Ventilation and external wall built with Glass facade or other similar material.	Side and rear marginal open space for Non-Residential (I.T., DataCenter, mall, Hotel, Institutional, educational Bldg. etc.) building deriving Artificial Light and mechanical Ventilation and external wall built with Glass facade or other similar material.	In addition to commercial building, there are several other buildings such as IT buildings, data center, mall, shopping Centre, hotel, Institutional Building which are designed with artificial light and ventilation, and have external wall with glass façade.
Title of Column 8 of Table A	Plot size more than 100 sq. m and average width/ depth of plot more 20m	Plot size more than 1000 sq. m and average width / depth of plot more than 20 m	"100" is mentioned in place of "1000" by error. Word "than" is missed out by error.

Clause No.	Proposed modification as per Notification	Suggested Clause	Reasoning
Sr. no. 3 under Column 7 & 8	9 m or requirements of CFO whichever is higher	9 m	Open space with respect to CFO requirements is specified separately in regulation 47(1) of DCPR 2034. Same shall not be specified here as this regulation is with respect to open space for light and ventilation.
Sr. no. 4 under Column 7 & 8	9 m or requirements of CFO whichever is higher	9 m	

**Some additional Points for consideration;**

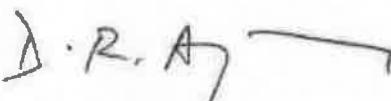
1. It may be noted that there seems to be no reason for the exclusion of dead walls in the suggestions. The CFO norms require open-able Windows to help evacuate and firefighting in spite of having glass facades and mechanical ventilation as well. These glass facades ensure adequate natural light is being obtained in the building.
2. The dead wall portion is used for facades wherein toilet blocks/server rooms/other services do not involve actual office near such portions. Insisting 9m for even such sides seems rather arbitrary as these portions of office will not serve any firefighting purpose. Moreover, such portions are clad in Aluminum Composite Material usually and are built with sheer walls.
3. We have already seen that Mumbai Commercial and IT/ITES buildings have lost significant ground to Hyderabad and Bangalore. Such stringent norms will de-motivate aspiring developers from coming forward to invest in building world class Commercial and office spaces. Our honorable Deputy Chief Minister has already acknowledged the loss of traction in office spaces and how it has ruined long-term prospects to Business and Operations for the IT/Finance and Media Industries.
4. Having such norms will enhance the premiums and cost of constructions and will make the cost of construction and investment into such buildings higher considering the increase in deficiency for dead wall portions as well.
5. The said policy will also be a deterrent to the media industry as studios will have to follow stringent open spaces, and they have many more dead areas.
6. One side we are encouraging green buildings however, one of the important features of green building which is double glazed facade which has a lot of dead spaces - hence this policy will hamper sustainable development of buildings.

We hereby request you to kindly give us an opportunity of personal hearing so that we would be in a position to personally explain our objections with respect to the said proposal made by you. We also crave leave to refer to add, alter or amend the aforesaid grounds of objections in future and also during the personal hearing.

Thanking you,

Yours faithfully,  
For CREDAI-MCHI

  
Boman Irani  
President

  
Dhaval Ajmera  
Hon. Secretary