

Date: 26/09/2022

To

The Chief Town Planner (Administration),
Town & Country Planning Department,
2nd Floor, Dempo Tower, Patto Plaza, Panaji – Goa. 403001

SUBJECT: Objections and Suggestions to the Amendments of the Goa Land Development & Building Construction Regulations, 2010.

REF: Notification No 21/1/TCP(A)/2021/Steering Committee/1377 published in Extraordinary Official Gazette No. 2, Series I, No. 21 on 29/8/2022

Sir,

As a licensed architect and urban planning researcher at one of the top planning colleges, I am writing to you to record my objections to the proposed amendments of the Goa Land Development and Building Construction Regulations, 2010 (GLDBCR) which concern themselves with many issues and have to be examined from an environment planning perspective.

I place before you my **OBJECTIONS/ SUGGESTIONS** regarding each amendment as follows;

1. **Amendment of Regulation 2:** The intention of clauses (52), (52A), (52B) appears to be in the interest of the safety and good design of buildings. However, a diploma is equivalent to 12th standard education, while a B.Eng or B. Arch is a professional degree which has at least 4 additional years of technical know-how. I believe that merely increasing the experience requirements of Graduate and Diploma Engineers is not enough but rather the provision has to be restricted to architects alone.
2. **Amendment of Regulation 3.11:**
CONTEXT: Clause (c) is amended to remove the words “*but within five years of issue of Occupancy Certificate*” from the original content. This can be understood as an acknowledgement from the Department that occupants are violating the approved building use after occupancy is granted. Removing the condition will make **no change** in its implications, and rather the effect of the audit will get diluted.

I suggest that the words “*and the same shall be done **at least** once within **every** five years after issue of Occupancy Certificate*”

shall replace the words “*but within five years of issue of Occupancy Certificate*” in the said clause.

3. **Amendment of Regulation 4.11:**

CONTEXT: Clause (d) is proposed to replace “*Authority/Council/Panchayat*” with “*Authority/ Council/ Panchayat/ Town and Country Planning Department/Planning and Development Authority/Public Works Department*”. This is in regard to development of land without or with inadequate access, where the 3 existing authorities in the clause were empowered to acquire and / or relax requirements on the individual merits of each case. Such landlocked cases are common in Goa. Obviously the Panchayat through the ward *representative* will be the right authority to know the ground conditions, especially so by the powers it has under the 73rd and the 74th Amendment of our Constitution. The TCP / PDA and/or PWD department are not democratically elected nor responsible under the 73rd and 74th amendment. They can at best conduct a survey and advise the local body with the grant of permission.

Therefore I suggest that the words “*Authority/Council/Panchayat*” be replaced by “*Council/Panchayat **upon the advice of the** Town and Country Planning Department or Planning and Development Authority and/ or Public Works Department*”. This will ensure collective and deserved consideration of the matter from a local governance and technical point of view.

4. **Amendment of Regulation 6A.1 in Table-VII and 6.A.4 (i) in Table-VIII:**

CONTEXT: Creation of a new zone as “*SPC-CBD*” under the Commercial category with 400 FAR and other related requirements of road width, coverage, setback and height, is going to have a dangerous impact on the locality and on Goa as a whole. It is a regressive desification step. Please understand that the density conditions enumerated in the amendment are similar to Mumbai’s infamous Slum Redevelopment Apartments. It is very clear that such a proposal has been poorly conceived without adequate density surveys, case studies where FAR 400 has worked/failed – re Connaught Place, New Delhi and carrying capacity study. At present the state’s infrastructure cannot support such density in any location. Further, despite the 2010 regulations requiring CBD areas to be declared for the following zones C1, CS, SPC. Till date there is **no CBD declared in any part of Goa.**

My suggestion is as follows:

- a. The TCP department needs to produce a study on all urban areas of Goa and identify Central Business Districts. These districts need to conform to NIUA / TCPO guidelines.
 - i. They can only be in Municipalities / Corporations
 - ii. have to be Central,
 - iii. the use must be primarily Commercial – not residential
 - iv. And the size of the district must adhere to national and international precedence, ie – large areas.

Based on the study the Department will be able to prepare a draft CBD demarcation.

- b. The department needs to update all the ODP's adding the CBD boundaries. The study reports in (a) must be released at the same time. The same should be notified to the public and suggestions / objections be invited.
- c. The TCP department must go city-to-city and explain the value of the CBD to the people. In order to get maximum suggestions and objections from the public.
- d. The TCP department needs to put together a committee of experts (not businessmen, but qualified planners and architects) to review the CBD boundaries and the objections.
- e. Only once this is done may the existing C1, CS and SPC permissions be granted to start construction in those zones. A moratorium on all C1, CS and SPC permissions need to be adopted until the CBD is operational.
- f. Once the legal process is followed for CBDs and CA, SC & SPC operationalised, only then can the department start contemplating fresh zoning of even higher density.

I also object citing data from Census 2011 which indicated that 20% of Goa's structures are vacant. The state and the TCP department has yet to come out with a policy for ensuring that vacant buildings and apartments get occupied. It has been a long standing demand of the people of Goa for special status and land-ceiling Acts. Too many of us lament Taleigao and Siolims' empty housing colonies. Those who will benefit from this amendment have no regard to green buildings, sustainable development and interest of the local communities.] strongly object to such a new zone to be added under commercial zones in Table VII and Table VIII and **demand that the same be dropped completely.**

5. **Amendment of Regulation 6.A.3.1:**

CONTEXT: Clause (e) is regarding housing to be allowed in Industrial zones of I-1, I-2 and I-3. The condition of *minimum 10,000 m2 plot and maximum 2.5% of built up area* has been relaxed to include plots with minimum 5000 m2 and increased the maximum extent to 7.5% of built up area. This amendment / dilution defeats the very reason why residences are limited inside Industrial zones – **the unhealthy and unfavourable living conditions**. Residential uses are prohibited in Industrial zones due to odd working hours, higher environmental pollution levels, and risk of health conditions to vulnerable and high risk people. This proposed amendment will undo one of the basic tenets of planning and convert all utility spaces (themselves necessary for industry operations) into residences, not just limiting the availability of utilities but putting human life at risk.

Therefore I strongly object to this amendment, and demand that the existing clause (e) be **retained without any change**.

6. **Amendment of Regulation 6.A.3.1:**

CONTEXT: Clause (i) has been added with (iii), (iv), (v), (vi), (vii), (viii) and (ix) with explanation in 3 points at the end. This completely **erases the very idea and objective of Eco-sensitive zones in the Regional Plan of Goa**. The meaning of the word “Agriculture” and the use allowed in the existing paras which are proposed to be numbered (i) and (ii) is the complete opposite, and will be the death of all Agriculture in Goa – which has been one of our traditional occupations.

All the 7 new uses proposed to be included in this said clause are all in complete contravention to agriculture, each one threatens the eco-sensitivity of our fragile coastal ecosystems, our traditional livelihoods and occupation, exposes local communities to increased coastal risks, accelerates climate change crisis, contradicts many other mandated authorities like the National Building Code and High Court / Supreme Court orders and completely tears down the protection that our eco-sensitive zones exist to protect us from climate change risks. This is a complete disaster and can be the sole cause of irreversible damage to the local environment which will prove to be very costly for Goa. The superficial lacing of green certification and restrictions on two of the uses in ECO-Sensitive-I in spite of multiple studies and literature which indicate that green-certification often makes greenfield projects more unsustainable – also suggest that other uses are not even required to follow green certification or any other restrictions.

The very basis of land uses comes from fertility and nature of the soil, obviously cultivable soil has several economic and environmental advantages, this amendment will make it fallow.

Some of the aspects of this amendment are so incomprehensible, for example, an “eco-friendly golf course”. There is not a single example of that anywhere in the world! As we speak, Golf Courses are causing massive wildfires in California, and landslides in Nevada, USA. Further, construction to the extent of 30% does not make any sense. misconceived notions of the sizes of residential schools, yoga centres and film cities will lead to loss making projects and expose indigenous population to life threatening risks.

I demand to know the locations of such proposals which are under consideration by the authorities and which have prompted this senseless amendment. The 3 talukas of Tiswadi, Bardez and Salcete are already listed as highly vulnerable to climate change risk, with 60%+ being projected to be underwater by 2040, the ESZs are the only buffer against this hazard. Is the TCP department prepared to take such a risk? Is the TCP ready to violate the fundamental Right to Life and Right to Property?

Therefore I very strongly object and demand that this entire amendment be completely dropped and **the original be maintained without any change.**

7. **Amendment of Regulation 6.A.4:**

CONTEXT: Note (4) is being substituted by “ *Farm houses within A1 and A2 zones shall be permitted with maximum permissible FAR as provided in Annexure–XI, provided these lands are not classified as “Rice” (Paddy field) in Survey Records and “Forest” under Forest Act. However, in case of elevated land, recorded as rice in the Survey records and the land is not low lying and also not a “Forest” under Forest Act, farm houses shall be permitted, provided the minimum area of such land is not less than 10,000m², the maximum ground coverage shall be limited to 2.5% and the maximum built up area shall be limited to 500m² with a maximum height of 7.60m from the ground level to the eaves of the roof.*”

This amendment dilutes the restriction of no-construction in rice fields and merely by the elevation of the rice fields. It is a fact that the State, the revenue department, land survey department and the TCP department has no existing elevation documents or records. Unscrupulous developers will now illegally “elevate” all the low lying rice fields as the ground

reality of elevation will be indisputable proof applied by the department.

The environmentally sustainable *Morodd* cultivated land of Rice in Goa will also be open to construction with farm houses of 500 sq.m. each thus destroying a sustainable cultivation model that Goa evolved which is internationally respected. Farmers of Goa are very well planned communities and have high integrity of protecting their cultivable lands from corrupt practices. It's the approach of the land mafia who are cashing on the poverty and innocence of the farmer to usurp his land against offer of money against the backdrop of no sustainable agricultural crops and income. If all these uses are considered in A1 and A2 for construction, there will be no land left for posterity, with roads built in, machinery requirements, etc the rest of the agricultural areas also will die a slow death as a consequence. These zones are the rice-basket of Goa. If they are lost we are increasingly vulnerable as we become too dependent on Karnataka and Maharashtra for food and a single landslide can put the entire supply chain in peril.

Therefore I suggest there should be no dilution of allowing farm houses in Rice or Forest lands and the substitution of said Note be limited to *“(4) Farm houses within A1 and A2 zones shall be permitted with maximum permissible FAR as provided in Annexure–XI, provided these lands are not classified as “Rice” (Paddy field) in Survey Records and “Forest” under Forest Act.”*

8. **Amendment of Regulation 6.A.4:**

CONTEXT: Amendment of note (12) allows 2 stilt floors free, for height in areas of more than 150 FAR. There has been no study carried out to show that adding an additional stilt floor will solve the parking issues. Further, this is in contravention of urban design principles and will turn the entire ground-floor into dark unsafe places. No data is also available with the government of any audit reports showing parking areas audit after occupancy. I demand for a study to be commissioned and data and analysis to be put in the public domain so as to allow us to make an informed decision.

Therefore I very strongly object and demand that this entire amendment be completely dropped and **the original be maintained without any change.**

9. **Amendment of Regulation 6.A.4:**

CONTEXT: Note (16) proposes to substitute *“Further, at the time of approval of development plans, minimum 6 meters wide right of way should be available on the site.”*, with a new

Annexure-XII, proposing new minimum width of road for Settlement, Industrial and Hotels/Resorts uses. Please note that in Table-VIII, the same 3 uses are listed with minimum road width as 6, 10 and 8 meters respectively and the existing Note (16) merely states that this minimum should be existing/available on site at the time of development.

- a. Overall it is noted that all the road widths proposed in the Annexure-XII are less than what is applicable today,
- b. Further, the availability of access on site at the time of development is deleted –
- c. this means that whatever Annexure-XII requires can even be in a proposed state and a project with such compromised road conditions can still get approved and constructed.

At this rate all people of Goa will face a huge road safety impact, congestion and pollution and social unrest with the crowding and density increase without any supporting infrastructure. I strongly condemn the dilution of the road widths, – a dilution that comes from no logic, no precedence and no understanding of Goa's own vehicle requirements.

I also condemn the silly wording of "*Road Width*", there are two terms I am aware of, **Right of Way** and **Carriage Way**. Using such unscientific terms as "*road width*" "*upto*" etc will leave the law open to interpretation and illegalities by unscrupulous individuals.

Therefore I very strongly object and demand that this entire amendment be completely dropped and **the original be improved**. ie the Note (16), should be retained as it is and no change or addition of Annexure-XII be made to have an overriding effect on the minimum road widths available on site. Further, the TCP needs to decide if it is regulating Carriage Way widths of Right of Way widths, and correct the terminology and definitions in the Act.

10. **Amendment of Regulation 6.A.4:**

CONTEXT: Note (20) proposes to give additional FAR of 30% to hotels of 3, 4 and 5 star category. The recommendation for bonus FAR is with a 5-member committee, it has been evidenced multiple times that the committees lead to misrepresentation of facts and give opportunity for corrupt practices, corrupt individuals and illegal construction. The whole concept of additional FAR means additional burden on infrastructure, on the roads, waste management, power, water, safety which was not taken into consideration while planning as per the original FAR.

There is no mechanism in place to address what happens if the hotel/resort owner takes the

advantage of extra FAR and then changes building use to another type? **Regulation 3.1.1. has already illustrated this is a common occurrence.** There will be no justification if there is no sanctity to the reasoning. With no approval from the public on such increases which will burden their health and life as a whole, the committee has no standing to decide in isolation.

Hotels/Resorts are mostly in the coastal belt and we all know the burden on our fragile coastal systems have already suffered on many fronts, this will spell doom on our environment. Tourism and economy interest cannot override the right to life and well being of the people of Goa.

Therefore I very strongly object and demand that such a proposal of FAR increase be scrapped.

Additionally I suggest that the following words be added instead *“for grant of permission for all hotel projects the decision of the residents through Gram Sabha / Public Hearing shall be compulsorily considered by the committee”*.

11. Amendment of Regulation 6.A.4:

CONTEXT: Note (27), proposes some conditions on the CBD areas of plot size, road width and uses permitted. As pointed out earlier in point no. 4, I demand that no such SPC-CBD zone of 400 be introduced.

Therefore the need for these conditions **do not arise**, as such Note (27) be dropped from these draft amendments.

12. Amendment of Regulation 6.A.4:

CONTEXT: Note (28), proposes FAR above 200 to be on a premium to the Government. This is an obvious case of selling the land to make money. As in normal development process the fees are part of the procedure and any zoning has to be part of a plan made by the people in accordance with the 73rd and 74th amendment of the Constitution, therefore asking the public to agree to such clauses of premium makes no sense as the government is taking away our right to plan our own settlements.

Therefore I very strongly object and demand that the **the original be maintained without any change** and any increase in FAR be made part of the development charges payable during the technical approvals and within the applicable zone conditions

13. Amendment of Regulation 6.A.4:

CONTEXT: Note (29), proposes extra FAR for medical institutions. This is again a case of

giving extra as an afterthought which will arbitrarily burden the existing infrastructure.

Moreover, how many such hospitals are recorded in Goa which are above 200 beds. What if the hospital changes business after taking advantage of FAR increase? All this therefore appears to be proposals without any study and without sharing such study data if it is done. It is a clear afterthought, endangers life of the people of vicinity, no provisions to seek consideration from the public, no control on misuse, no data of eligible hospitals, encroachment of right of villagers to plan their village and ward, no sanctity for the development plan made by the villagers.

Therefore I very strongly object and demand that such a proposal of FAR increase be scrapped.

Additionally I suggest that the following words be added instead *“for grant of permission for all hospital projects the decision of the residents through Gram Sabha / Public Hearing shall be compulsorily considered by the committee”*.

14. **Amendment of Regulation 10:**

CONTEXT: Clause (a) after Table IX-A the NOTE is proposed to be inserted which proposes additional parking of 10% for guest parking. This proposal is a small band-aid on a massive problem of parking in Goa and also limited to residential apartments. The ratio of car parking needs to be re-examined in a holistic way as the car ownership in Goa is by far the highest in the country. Case studies can generate a revised car parking ratio for residential spaces. The additional 10% will never survive for the guests and will get consumed by needs of the owners itself.

Until a holistic review of the parking ratio is carried out by a qualified transportation planner, until that time the state needs to invest in reducing the number of cars and not increasing them.

Therefore I very strongly object and demand that this entire amendment be completely dropped and **the original be maintained without any change** until the study is carried out and a scientific solution recommended.

15. **Amendment of Regulation 10:**

CONTEXT: Clause (g) inserted suggest that 20% Car park spaces will have to be made *“Electric Vehicle Ready”*. This is contradictory to the policy of the state where Goa has become the only state to **remove subsidies for purchase of electric vehicles**. The state

Government needs to take a call on promoting or restricting the use of electric vehicles. A plan cannot be in conflict with other policies.

I highlight this approach required on this issue and suggest that the amendment be kept on hold until an analysis of the existing usage, and the Electric Vehicle policy be decided on by GEDA.

16. Amendment of Regulation 12.4:

CONTEXT: Clause (d) increases the utilities installations in open spaces from 5% to 10% added with facilities of garbage disposal area to be mandatorily shown in the site plan. The facility of the garbage disposal area appears good on its face value, but the details have not been defined in these regulations. A note containing description / definition is required to be added. Additionally, although this facility is one of the common facilities required for a subdivision campus, its functioning can completely destabilise the functioning of other open spaces and can even be a hazard to vulnerable users and facilities like transformers, etc. Therefore additional clauses regulating its proximity to other open space uses from a safety point of view is needed.

Therefore my suggestion is that a definition of “Garbage disposal area” be added as a note in support of this said clause and it should accordingly address the details of the area and safety provisions to be considered before finalisation.

17. Amendment of Regulation 12.6:

CONTEXT: Clause (b) (iii) has been omitted and content is in context to regulating the sub-division of A1 and A2 zone. Omission of this clause omits the Table – XII(A), which will open up the sub-division of ecosensitive zones A1 and A2 in a acute manner of 4000 sq.m. minimum plot size, down from the previous minimum plot size of 10,000 sq.m. and 20,000 sq.m.

Additionally, the lifting of the ban on further sub-division of plots partitioned after 2021 regulations will fragment plotted holdings of the Eco-Sensitive zones into small parcels and thereby creating pressure on the cultivable and fragile land. These conditions existed to deter sub-divisions of Eco-sensitive zones and to retain them in an undisturbed manner.

Therefore I very strongly object and demand that this entire amendment be completely dropped and **the original be maintained without any change.**

18. Amendment of Regulation 12.7:

CONTEXT: The renumbered clauses (a), (b) and (c) respectively consider the needs of a large community since the sub-division involves areas between 5 ha. to 50 ha. Understandably if

these are omitted, then the 5% reserved areas for community utilities will get sacrificed only to add to the disposal of the developer to sell the land and ignore community needs. This amendment will put a lot of pressure on the local body administration to then provide for these facilities outside these sub-divided and developed areas creating a burden on infrastructure and finances of the local administration. 5% area of such large sub-division development is very much needed to accommodate the needs for community well being which is the main objective of Town Planning regulations.

Therefore I very strongly object and demand that this entire amendment be completely dropped and **the original be maintained without any change**.

19. **Amendment of Regulation 22.4 (a):**

CONTEXT: Sub-clause (i) has been added with a sub-clause (b), which states that any unauthorised construction with area more than 500 sq.m. built before 31-12-2020 can be regularised with submissions of certain listed documents. This provision **serves no purpose other than creating and complicating disputes on illegal possession, encroachment and construction** on land which could belong to different individuals, organisations or comunidades. Regularising an illegal unauthorised structure itself is against any form of justice and presenting a cut off date and compounding fees are mere cosmetics and flexible conditions which can be revised forever to accommodate all under the sun.

Further, there have been number of court judgements which prohibit such provisions which are against the law, like the Hon'ble Supreme Court Judgement dated 28/01/2011 in Civil Appeal No.1132/2011 @SLP(C)No.3169/2011 (arising out of SLP(Civil) CC No.19869 of 2010, in which even the Government of Goa has presented an affidavit that all encroachment on community land will be identified and the land restored to its original state.

The provisions for regularisation of construction above 500 sq.m. do not benefit most Goans. They suggest that the rich developers who have engaged in illegal constructions will get protection under these regulations. The documentation condition mentions electricity/water bills and tax receipts. They conveniently do not specify what tax / bills, which have no bearing on the ownership rights in the land.

Therefore I very strongly object and demand that this entire amendment be completely dropped and **the original be maintained without any change**. I further demand that clause (a) of sub-clause (i) should also be omitted in consideration of a stringent action against illegal construction.

20. **Amendment of Regulation 22.5:**

CONTEXT: Note to be added for this regulation allows a shift of 5% in building height and in setback area. This is completely in violation of the National Building Code and all Fire Safety parameters. Any interference or reduction in the setback areas is completely out of question. The repercussions of such poorly thought out rules will lead to catastrophic loss of life and property.

Therefore I very strongly object and demand that this entire amendment be completely dropped and **the original be maintained without any change.**

21. **Amendment of Regulation Annexure-XI:**

CONTEXT: Clause 2 and 3 has been substituted with certain increase in coverage and FAR from 5% to 15%. This is regarding farm house regulations which are being increased 3 times of the original, thus subjecting the green eco-sensitive zones to construction activity 3 times as dense. The maximum built up area of the farm house has also been proposed to be increased from 500 sq.m. to 1000 sq.m. 1000 sqm farm house will never be the requirement of a genuine farmer living in the Eco zones.

This exposes all the Eco-sensitive zones to purchase and construction activities in addition to all that I have commented on in the earlier points. The green areas of Goa will be up for sale in plots of 4000 sq.m. each with farmhouses possible of 1000 sq.m. each. Is this the green model which the TCP department is planning for?

Therefore I very strongly object and demand that this entire amendment be completely dropped and **the original be maintained without any change.** This includes Annexure-XI clauses 2 and 3 be reverted back to its original state without any change.

22. **Amendment of Regulation Annexure-XII:**

CONTEXT: This Annexure has been completely replaced by another. The original Annexure as existing in the regulations provides for controlling excessive demand of power and in event of crossing a pre-established threshold of 500 kW the project proponent was encouraged to generate his own renewable energy. The applicability also has been listed in it, thus making the construction industry realise that power comes at a huge environmental cost and there has to be an equally huge effort in sustainable means of power. The Bureau of Energy Efficiency (BEE) is mandated to this cause and under the PAT scheme of the Central Government already different categories of buildings are listed as designated consumers for filing their energy consumption returns so as to monitor and regulate the energy

consumption by efficiency passive and active measures.

Dropping of these Energy Conservation Building Code from applicability to Goa is a very regressive step and is not in sync with the mandate of the BEE and the Government of India. Did the TCP department not study the National Building Code and the BEE policies? Or is it the expert opinion of the TCP Board that these are not a mandate in Goa.

Therefore I very strongly object and demand that this entire amendment be completely dropped and **the original be maintained or made more stringent in accordance with the NBC.**

The proposed replaced draft amendment for Annexure-XII allows relaxation of road widths for settlement, industrial and Hotels/Resorts. This reduction in road width has also diluted the “*available on site*” criteria and the carriage width having reduced further will increase the road problems leading to a social, economic and environmental crisis in our villages. Life will be at risk and congestion will be the norm of our village planning and development. Besides, more has already been commented on. No. 10 earlier.

Therefore I very strongly object and demand that THE effect of the Table VIII be **restored** and the proposed Annexure-XII be dropped and consequently the overriding effect also be dropped.

23. **Amendment of Regulation Annexure-XIII:**

CONTEXT: This Annexure proposes to introduce additional 30% FAR to the 3 star, 4 star and 5 star hotels and resorts by substitution of respective expressions in its principal regulation and clause (2) (xi). As pointed out in point no.13 the proposal of additional FAR causes burdening of existing infrastructure, over stresses the local resources, creates structural and environmental safety issues, over rides the rights of the villagers to decide on their local land use plan by virtue of 73rd and 74th amendment of the constitution, creates fire safety hazard, etc.

Therefore I very strongly object and in view of all the issues raised in point no. 10, demand that this entire amendment be completely dropped and **the original be maintained without any change.**

24. **Amendment of Regulation Annexure-XIV-A:**

CONTEXT: This Annexure-XIV-A is proposed to be a new addition to give additional FAR of 20% to medical institutions more than 200 bedded. It contains 13 points giving the conditions for the FAR eligibility. It should be very critically noted that 200 bedded is a big hospital or medical institute which would be very uncommon in Goa and therefore it is important to know if there are already requests from developers for the additional benefit. Moreover, any extra FAR is an issue which implicates structural safety, fire safety, other national building code norms, pressure on utilities, etc as such merely by listing safety certificates the issue does not get resolved as it promotes corruption to accommodate the economic gains from a little compromise on risks.

Therefore, it is intriguing to know why would a well established hospital want to get tainted by an addition of 20% FAR risking its other 100% health related work, and why would it not invest in a new hospital altogether in another dispersed location for better economic gains. This concept of extra on existing is completely flawed given the stressful conditions of the infrastructure and therefore it is more than necessary that this decision should be directly linked to the local people's need and their decision to approve such an increase following the 73rd and 74th constitutional mandate, as they are the ones who will get affected or benefitted from this provision.

Therefore I very strongly object and in view of all the issues raised in point no. 11 and mentioned above, demand that this entire amendment be completely dropped and **the original be maintained without any change.**

I further raise an objection to the fact that the sub-committee and steering committee who are in charge of all these amendments are populated by political leaders and business leaders rather than ecologists, environmentalists, sociologists and planners. This is a complete conflict of interest. While the TCP says representation of professionals has been done through the institutes, I point out that the **Institute of Architects Goa Chapter** represents **less than 20% of the practicing architects in the state.** And the Institute of Planners is similar, although the exact specification is not known to me. Young professionals who will be most adversely hit by these unscientific regulations and who do not have a safety net like established architects and engineers can have their careers destroyed if they construct one building as per these silly amendments. They need a seat at the table.

Land use planning has changed drastically in the last decade and environmental concerns were not so important in the past. Right now environmental planning is central to land use planning and is so crucial in Goa when we see the impacts of cyclones and climate change.

These amendments are in the self interest of a few rather than that of the indigenous communities, professionals or the land as a whole.

In view of all the above, I demand that my suggestions be received and I be granted an in-person hearing to air my concerns before a committee of my peers. I further request the department to plan for the state of Goa in a holistic manner by first projecting the Land Use at the state level - through a Regional Plan, Settlement Level – through Zoning Plans and ODPs (prepared by the people of the village not the PDA) and Local Level through ward-plans. The regulations can then be drafted and will have to conform to the plan and not vice-versa, and the whole process will have to be done with the participation of the people of Goa as per their constitutional right.

Thanking you

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