**Annexure 1**

**Suggestions on Draft Policy on Retirement Housingunder the provisions of**

**Haryana Development and Regulation of Urban Areas Act, 1975**

**ByAssociation of Senior Living India(ASLI)**

|  |  |
| --- | --- |
| **Point Nos** | **Our Submission** |
| Foreword | Sounds very negative and showcases our industry in a bad light. The foreword/entire policy needs to be positive in its intent. The objective must be to ensure future residents benefit from the minimum standards detailed in the Policy |
| 2 (ii) | Need clarity on individual`s age limit. Single senior member age should be 55+ years of age. |
| 2 (iii) | Should be called Coloniser/developer |
| 2(iv) | Maintenance and management should not be governed by RERA document but by thisPolicy |
| 5 (i) | There should be no cap on the size of the site. If we need a cap then it should be 20 acres as it allows for much more open senior living to be planned |
| 6 (d) | There should not be any upper limit cap on the carpet area size. As some seniors like bigger unit. If they leave a bungalow they still would like a large home. |
| 6 (e) | This will increase the loading and will result into more expensive homes for the senior citizens. Quantum of accommodation for team members within the Community should be determined by location, accessibility and availability of human resource and should be left to the developer/service provider. |
| 6 (g,h,i,j) | All these points should be left to the developer to plan as per the project, location, client profile etc. Putting specifications hampers the ability of the developer to design a successful project. We should have a minimum cap but no maximum cap. |
| 6(l) | We should have max 3 persons on permanent basis per dwelling units. |
| 6(n) | If you have defined PPA then no need for min/max apartment size requirement. |
| 6(o) | Parking norms to be defined as 1 car per unit &an additional 5% as visitor’s car parking. |
| 7 | Can we get benefits on 50% of EDC as the density of senior living is low therefore service infrastructure requirement would be lower. |
| 8 (a) | The record keeping of this magnitude is too difficult and will become increasingly difficult to scale up. |
| 8(c) | A tri-partite agreement shall be executed between Allottee,***Developer*** and the Service provider before taking possession of the apartment. Eligible resident may/may not be allottee, could be a tenant. He must follow the norms & enjoy the privileges laid out in the tripartite agreement. The eligible allottee will follow all his rights and duties as per the tripartite signed by the allottee. |
| **Annexure A** | |
|  | **Broad Planning Principles** |
| i | There should not be any insistenceto make any structureon the Ground Floor. The idea should be easy accessibility to people who have walkers or on wheelchair. If compulsory only medical facility all other recreational facility can be on higher floors, which will allow for more open spaces for seniors which they like. |
| ii | Mentioned above in point 6(e) |
| iv (a) | Insisting on high specification - like higher quality lifts, and features will increasethe projectcost. |
| v(d) | With no more than 13 treads in a single flight(should always be an odd number more comfortable) |
| v(f) | Illuminated/florescent/radium strips can become more difficult to use.Contrasting strips are good & not distracting. |
| vii | It’s a anexpensive featuremaking it impractical for all the houses. |
| viii(b) | Toilet paper roll should not be mandatory/instead grab rails should be made mandatory. |
| viii(d) | Toilets door should have either outward opening doors or sliding doors. |
| xi(e) | Should not be mandatory as not all residents might feel comfortable in sharing medical details. |
| xiii (d) | Free word should be deleted for intercom, as there is a cost of AMC. |
| xiii (g) | Though CCTV cameras are integral part of the safety procedure of seniors it also means huge maintenance cost for residents. We propose CCTV’s to be installed in common areas like lobbies, reception, gates etc but not on each floor. |
|  |  |
|  |  |