

19 February 2026**To****The Municipal Commissioner, MCGM, Mumbai****The Chief Minister, Maharashtra State****Subject: Mahalaxmi Racecourse — Preserving Public Open Space in Mumbai****Dear Sirs,**

We write to you as a follow-up to our letter of *24 September 2024*, in which we urged that all open spaces in Mumbai remain open and accessible to the public in perpetuity, under public control. We write now because a specific and significant case demands your attention: the proposed redevelopment of the Mahalaxmi Racecourse.

We welcome any proposal that genuinely improves public access to the Racecourse. But we are concerned that what is being proposed goes well beyond access — and that its full implications have not been placed before the public.

1. The Racecourse Is Already Public Land

The Mahalaxmi Racecourse is not private land. It belongs to the city. Citizens have long used it for walking, exercise, and recreation. Improving access to it is welcome and right. But access does not require excavation. Opening the gates to this ground does not require the construction of underground complexes beneath it.

2. Mumbai's Open Space Crisis — and Why Every Acre Matters

Our profession has a responsibility to state this plainly: **Mumbai is in a serious open space deficit**. The globally established norm is 9 sq.m of open space per person (WHO). The accepted figure for Mumbai is approximately 1.2 sq.m — already a fraction of what a liveable city requires.

Our own research, conducted through physical surveys of H/W Ward (Bandra, Khar, and Santacruz West) and presented publicly at The Everyday City exhibition, found the situation to be even more acute:

- 0.87 sq.m of public open space per person in the ward — against the WHO minimum of 9 sq.m
- Only 0.15 sq.m of active play space per person
- Approximately 30% of open space in the ward is restricted or private
- Around 50% of nominally "public" spaces are locked during typical daytime hours

Our assessment is that this figure will halve further under the current liberal FSI policy being extended to redevelopment — as permeable open land within housing societies is replaced with built footprint. In this context, the loss or degradation of any large public ground is not a minor matter. It is irreversible.

3. The Racecourse Is an Environmental Asset — Not Just an Amenity

The Racecourse is one of Mumbai's last large, contiguous, natural grounds. In a low-lying coastal city with chronic flooding, this matters enormously. Natural ground absorbs rainwater, allows groundwater recharge, and reduces flood risk in the surrounding area. These are not incidental benefits — they are critical urban infrastructure functions.

The Bombay High Court recently observed that the ecosystem services provided by Sanjay Gandhi National Park are valued at over ₹15 lakh crore (approximately \$18 billion). The principle is the same for every natural surface in this city. Building basements, parking structures, or underground facilities beneath the Racecourse would permanently compromise its drainage function — for infrastructure that is neither necessary nor environmentally prudent.

Open maidans do not require expensive, manicured landscaping. A natural, playable surface is sufficient — and democratic. It costs far less to maintain, and it serves everyone without access controls or entry fees.

4. This Is Not a Garden Project — It Is a Major Infrastructure Project

The proposal is being presented as a park upgrade. It is not. Underground parking structures and constructed sporting facilities are capital-intensive projects. They are expensive to build, expensive to operate — to ventilate, light, secure, and maintain over decades — and they inevitably introduce access controls. Once built, these structures change the fundamental character of a public ground, often permanently.

We also note a financial inconsistency that requires explanation. The BMC previously stated it did not have approximately ₹400 crore to develop and maintain the open spaces along the Coastal Road — and therefore handed that responsibility to a private corporation. We ask, in good faith: if that is the case, how are significant funds now available for underground construction at the Racecourse? These two positions must be reconciled, and the public deserves a transparent answer.

If substantial public funds are genuinely available for open space, they would be more equitably spent improving and maintaining the existing network of public gardens and parks across the city — many of which are neglected, understaffed, and inaccessible for large parts of the day.

5. If Parking Is the Goal, Build It Under Roads — Not Under Parks

We wish to address the argument for underground parking directly. If the city requires additional parking capacity in this area, the correct location for underground parking is beneath roads and carriageways — surfaces that are already impermeable, already built over, and whose excavation causes no additional ecological or hydrological harm.

This principle was at the heart of the successful public campaigns that saved **Patwardhan Park** in Bandra and **Pushpa Narsee Park** in Juhu from being converted into parking lots. In both cases, citizens, political representatives, and the BMC ultimately agreed that public parks must not be sacrificed for parking. We urge that this position now be adopted as a formal, city-wide policy: *no underground parking beneath public open grounds*. Where parking is needed, it belongs under roads.

6. The Underground Tunnels and the TOD-FSI Connection

The proposed underground pedestrian corridors deserve particular scrutiny. Under DCPR 33(23), Transit Oriented Development provisions allow additional FSI — greater buildable area — to properties within 500 metres of Metro stations, provided they offer direct access to such corridors. The tunnels are not, therefore, simply pedestrian conveniences. They unlock development potential for surrounding real estate. This is a material fact, and it reframes the entire proposal: this is not only a park project, but part of a larger urban infrastructure and FSI framework with significant commercial implications.

7. The RWITC Land — Full Transparency Is Required

Approximately 93 acres of the Racecourse remains under the control of the Royal Western India Turf Club (RWITC). This is extremely valuable public land. Multi-storey buildings, basements, and expanded built-up area are being proposed within this parcel. We ask that the public be given complete transparency on:

- The current lease terms and their duration
- Development rights being granted or proposed
- Financial arrangements between the RWITC and public bodies
- The measurable public benefit, independently assessed

In a city where our own survey found public open space at 0.87 sq.m per person — and where this figure is projected to fall further — any increase in built-up area on public land must be justified rigorously and in public.

8. A Once-in-a-Generation Opportunity — If We Choose It

Central Park in New York and *Hyde Park in London* are not built over or built under. They remain open, permeable, and natural — not because no one thought to develop them, but because those cities chose otherwise. Open space is not a residual. It is foundational infrastructure. Studies consistently show that proximity to parks improves physical and mental health, reduces healthcare costs, and increases surrounding property values — making cities more liveable and more economically productive.

The Mahalaxmi Racecourse, together with the newly reclaimed lands along the Coastal Road, presents a once-in-a-generation opportunity: a continuous, connected, flood-resilient network of public open space at the heart of the city. This is the vision we urge you to adopt.

We urge the following:

- That no underground parking or built infrastructure be constructed beneath the Mahalaxmi Racecourse or any other public open ground; and that where parking is required, it be located beneath roads and existing impermeable surfaces.
- That the city formally adopt the principle established at Patwardhan Park and Pushpa Narsee Park as policy: public open grounds shall not be converted to parking, above or below ground.
- That full public disclosure be made of all proposed development rights, lease terms, FSI grants, and financial arrangements relating to the Racecourse — including the RWITC parcel.
- That any funds available for open space be directed first toward the maintenance, improvement, and accessibility of the existing public garden and park network across the city.
- That the Racecourse and the reclaimed Coastal Road lands be planned together as a connected, permeable, publicly accessible open landscape — and that this vision be adopted as a matter of formal policy.

Open space is not a luxury. It is essential urban infrastructure. We look forward to your considered response and to working constructively toward a Mumbai that is greener, more equitable, and more liveable for all its citizens.

Sincerely,

Mumbai Architects Collective

Note: *Open space data for H/W Ward (Bandra, Khar, Santacruz West) is drawn from primary field surveys conducted by Bombay Greenway and presented at The Everyday City exhibition, 2024. The 9 sq.m per person figure is the WHO recommended minimum for urban open space.*

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| 4 P K Das | 38 Rekha Desai | 72 Rohan Shivkumar |
| 5 Rahul Kadri | 39 Jamshid Bhiwandiwala | 73 Nandini Sampat |
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