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D S RAWAT
Secretary General

Director (Pig.) MPD-2021
Dy. No. 3463
Date 3/12/12

December 24, 2012

Shri D Sarkar
Commissioner-cum-Secretary
Delhi Development Authority
'B' Block, Vikas Sadan
New Delhi - 110 023

DD (MP)'S Office

Diary No. 136

Dear Sir,

Date 7/1/13

Received By: NO 7
Dated 27/11/12
Section, Vikas Minar
Delhi Development Authority
Meeting Asset

Director (Pig.) MPR/TC,
D.D.A. Vikas Minar N. DELHI-2
Dy.No. L-330
Dated 1/1/13

Subject: MPD 2021: Objection / Suggestion in response to the public notice dated October 1, 2012 in request of the proposed modifications

This is in response to the Public Notice dated October 01, 2012, inviting Objections / Suggestions in respect of the proposed modifications in Master Plan for Delhi 2021.

We are enclosing a detailed note on the subject for your kind perusal. We shall be grateful for your kindly considering our suggestions on the aforementioned subject;

Looking forward to hearing from you and with kind regards,

Yours sincerely,

(D S Rawat)

Encl: As stated

cc: ✓ Additional Commissioner (Planning)
Master Plan Review Section
12th floor, Vikas Minar
New Delhi - 110002

-Dir/MPD

Asst. Secy (MPD)
2/1/12

Asst. Secy
2/1/13

Dir/MPD
04/01/13

Director MP

This is in reference to Public notice dt 1/1/12
May be seen by Masterplan
Asst 1/1/13

Subject: MPD 2021: Objection / Suggestion in response to the public notice dated October 1, 2012 in respect of the proposed modifications

Allow Residential Group Housing with maximum 20% FAR for Commercial Activities in Industrial Plots on 24 mtr ROW, where 100% commercial activity is already permitted and which also meet the Group Housing norms as per MPD 2021

This is in response to the Public Notice dated October 01, 2012, inviting Objections / Suggestions in respect of the proposed modifications in Master Plan for Delhi 2021. We are submitting following suggestions for the proposed amendments in the Master Plan for consideration.

1. Topic: Chapter 7: Industry

Modifications in the existing provisions as proposed by DDA:

"CHAPTER 7.0 -INDUSTRY: Inclusion of "2. Residential -20%" in the Table 7.2 and addition of following note below the Table 7.2:

Note: In case of residential use premises regulations for Group Housing shall apply. The land shall be reserved for facilities as per residential facilities. Following break up for Industrial housing:

- *Industrial Worker: 80% of DUs housing (category I of MPD -2021)*
- *Entrepreneurs / Supervisor: 20% of DUs (category II and III of MPD-2021)"*

The same note also refers to a provision: *"The land shall be reserved for facilities as per residential facilities"*, in the proposed modification in the referred Public Notice.

Objections regarding the Dwelling Units for Industrial workers:

As per MPD 2021, and a Supreme Court order, only non-polluting and non-hazardous industrial activities are allowed in Delhi, so the requirement of housing units for Industrial workers would be very limited. Hence, housing provisions for only industrial workers would not be a viable proposition.

Also, the proposal of 'land reservation for facilities', actually penalizes the plot owners for providing community facilities by depriving them of land as well as F.A.R for Group Housing.

Suggestion regarding the Dwelling Units for Industrial workers:

With reference to the above referred **CHAPTER 7.0: INDUSTRY**, we propose the amendment as following:

- Under the proposal, industrial plots located on 24 mtr ROW should be allowed residential development as per Group Housing norms with up to maximum 20% of the area to be marked for commercial use, and applicable FAR as per MPD 2021 on the entire plot with incentive of 1.5 times FAR which is permitted under notification S.E. no. 683(E) dated 1st April 2011 should also be extended under this scheme.”
- All applicable charges shall be paid, approval of the layout plan/ building plans and all other necessary clearances required for Group Housing schemes, shall be obtained from the concerned agencies and the concerned local bodies.
- Any separate category of Industrial Housing should not be applicable.
- Also the guideline given in clause 3.3.2 (ix) of MPD 2021 should be followed. “The concept of Accommodation Reservation i.e. allowing construction of community facilities without counting in F.A.R.” should be followed.

2. Chapter 17: Development Code:

Proposed amendments by DDA CHAPTER 17 - DEVELOPMENT CODE: Clause 8: Sub Clause 8(2): Permission of Use Premises in Use Zones.

S.No	Use premises	Use Zones				
		RD	C1	C2	M	PSP
M. INDUSTRY						
1.	Industrial Plot, Flatted Group Industry	P	N P	N P	P	N P

Objections on proposed Development Code:

The amendment proposes that under the use premises 'M-Industry', Industrial Plot, Flatted Group Industry are permissible in Use Zone "RD-Residential" which is incorrect, since this contradicts with the proposed amendment of permitting 'Residential Group Housing' in the Industrial plots.

Suggestive amendment in proposed Development code :

It would be appropriate to allow Use Premises 'RD - Residential Group Housing' under the Use Zone 'M- Industry' as illustrated in the Table as under:

S.No.	Use premises	Use Zones				
		RD	C1	C2	M	PSP
RD RESIDENTIAL						
1.	Group Housing	P	P	NP	P	P

The following points further validate above proposed suggestions:

The past two Master Plans for Delhi, covering a period of over 40 years, had emphasized upon the policy of 'segregated land uses' (including residential, commercial, industrial, public and semi-public etc.). As a global trend, the industrial areas are outside the city limits. And even in India, Mumbai has followed the same concept.

However, Delhi happens to be an exception in view of Policy Makers and Planners, which may be due to sheer ignorance on the subject matter, has let unauthorised colonies and industrial development erupt across city.

In present scenario, Trade, Commerce and Industry are interlinked sectors and this relationship has to be effectively translated in physical development in a major cities. Delhi, with a population of over 12 million, is affected by major influx of population from other cities including tier-II towns, in the form of modern workforce, driving the demand for residential properties.

Since Master Plan for Delhi 2021 has provision of regularisation of the unauthorised colonies and industrial clusters including planned industrial areas, it is more imperative to address the norms in a manner to make Delhi a world class city by adapting the latest concepts based on international trends. The most important issue, concerning Delhi, is the need to optimise Land usage, which is a scarce resource.

However, the proposed Master Plan for Delhi does not address this issue by providing any provision for residential housing in close proximity to the designated industrial areas. As most of the polluting industries have been shifted out of Delhi, the industrial areas (Planned /Unplanned industrial clusters) the industrial clusters have been identified for conversion to commercial use with enhanced incentivised FAR based on the notified policies.

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By allowing **Group Housing** on these plots as per MPD 2021 norms, with 15% of FAR dedicated for Community Service Personnel and low cost housing over and above the permissible FAR, would address the larger deficit of Housing Dwelling Units.

It is therefore suggested that 'no particular category related' restrictions shall be levied on residential housing development in industrial areas.

As per MPD 2021, Hostels, Night shelter, Old age homes are already allowed in the industrial plots sizes and a provision for Hospitals is also recommended under revision of MPD 2021. Hence, allowing Residential Group Housing on such industrial plots would just be an extension to the next level of Use Premises, in the same use zone "RD-Residential".

This will ensure effective implementation for the benefit of the City and community at large, benefiting poorest of the poor while addressing the housing shortage.