

Director (Plg.) MPRATC, D.D.A. Vikas Minar N. PELHI-2

....NATIONAL REAL ESTATE DEVELOPMENT COUNCIL

First Floor, 3 Community Centre East of Kailash, New Delhi - 110065

Date: December 26th, 2012

Commissioner-cum-Secretary
Dell' Development Authority
'B' Flock Vikas Sadan,
New Dell' 110023

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

Sir,

Diary No....

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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. Our members have sent us certain suggestions for the proposed amendments in the Master Plan.

In the advertisement, under the topic "Chapter 7: Industry: Modifications in the existing provisions as proposed by DDA", we are addressing the Note "In case of residential use premises regulations for Group Housing shall apply. The land shall be reserved for facilities as per residential facilities, with following break up for Industrial housing:

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

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

Our members would like to express their **objections** with regards to the above mentioned proposed amendment in the Master Plan. As per MPD 2021 and a Supreme Court order, currently only non-polluting and non-hazardous industrial activities are allowed in Delhi, so the requirement of housing units for Industrial workers is no more relevant, making provision of housing for only industrial workers unviable.

Also, the proposal of 'land reservation for facilities', works as disincentive for the plot owners as it deprives them of land as well as F.A.R for Group Housing.

We would like to present our suggestions regarding the proposed amendments under CHAPTER 7.0: INDUSTRY 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

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This is eusponed at 1/10/19
to Public robite of 1/10/19

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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.

With regards to the Chapter 17: Development Code, DDA has proposed amendments under Clause 8: Sub Clause 8 (2) pertaining to permission of Use Premises in Use Zones:

| S.No. | Jse premises Use Zones | |
|-------|--|----|
| | RD C1 C2 M PS | P. |
| | W. INDUSTRY | |
| 1. | Industrial Plot, Flatted Group P N N P N | |
| | Industry P P | |

Our members would like to express their objections on the proposed Development Code as under the use premises 'M-Industry', it proposes Industrial Plot and Flatted Group Industry as permissible in Use Zone "RD-Residential", which is incorrect. In fact, this contradicts with the proposed amendment of permitting 'Residential Group Housing' in the Industrial plots.

We would like to emphasise upon the suggestive amendment in proposed Development code, as it would be appropriate to allow 'Use Premises' as 'RD - Residential Group Housing' under the Use Zone 'M- Industry'. The same is illustrated in the Table as under:

| S.No. | Use premises | | (All Towns of the con- | Use Zones | Alle to the same | |
|----------|--------------------------|----------------|------------------------|------------|------------------|---------|
| | | RD - | C1 | C2 | M | PSP + |
| | RD RESIDENTIAL | | | | | |
| 1. | Group Housing | Political | Gue Porte | NP H | Poplari | e Prode |
| id. wuru | Selfar fore outer-marine | Mare of Barrie | | MANAGEMENT | | |

We would like to further emphasise upon our suggestions with regards to the policy of 'segregated land uses' (including residential, commercial, industrial, public and semi-public etc.). As a global trend, the industrial areas are normally 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 Mekers and Planners, which may be due to sheer ignorance on the subject matter, has let unauthorised colonies and industrial development erupt across city.

present scenario, Delhi, with a population of over 12 million, is affected by a 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.

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 is to request you to consider our suggestions/ modifications during review of MPD 2021 so as to ensure effective implementation for the benefit of the Gity and community at large, benefiting poorest of the poor while addressing the housing shortage.

With regards,

Yours singerely,

Brid. (Retd.) R R Singh Director General

- Sh. Kamal Nath
 Honb'le Minister for Urban Development
 Ministry of Urban Development

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