

DD (MP)'S Office

REAL ESTATE DEVELOPMENT CO

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December 31, 2012

First Floor, 8 Community Centre East of Kailash, New Delhi - 110065

Sh. S K Srivastava Vice Chairman Delhi Development Authority. B Block, First Floor, Vikas Sadan INA, New Delhi - 110003

OFFICE OF THE DIR (PIg.) MPR/TC, D.D.A. N. DELHI-2 Dated::::::::::::::::::::/::///

Sir,

ub: Rationalisation of

This has reference to our earlier representation dtd Nov 130 2011 regarding "Density Flexibility". Delhi Development Authority has invited suggestion objections dated Oct. 1st 2012, wherein under "Chapter 4.0- Shelter" the issue of density is not mentioned.

As the MPD 2021 is under review and our members, who have been tracking the review, would like to draw your kind attention towards the importance of Density Norms of Group Housing, which currently compels to make abnormally high number of dwelling units in the existing built-up areas of Delhi and adversely impacting the existing infrastructure.

The 'rationalisation of Density Norms' is very critical, hence there is an urgent need to relook upon the issue of density norms of Group Housing under MPD 2021. This is to request you to include it in the MPD 2021 review and invite public suggestions / objections on the

Meanwhile, our members have following observations pertaining to the prescribed density norms and their consequences:

The MPD dwelling u uniformly. The MPD 2021 has specified density norms, category-wise, based upon the size of dwelling units, for the first time. Also these norms are to be applied to all areas of Delhi

The density norms based upon dwelling unit size is counter-productive as in order to achieve full FAR dwelling units of sizes nearer to the upper limits of the categories of dwelling unit sizes specified in MPD 2021 will have to be constructed. This would result in more number of units on a plot for a particular FAR.

To achieve full FAR, a high number of dwelling units will have to be provided on plots in existing built up areas with earlier lower densities. This would put severe burden on the existing infrastructure including adding more pressure on traffic in the existing areas.

The existing infrastructure and roads were designed long ago with design criteria perceived at that time keeping in view the anticipated density at that time. Now the sudden re-densification as proposed in MPD 2012 of existing areas would require massive augmentation of this existing infrastructure which has physical limitations of up

On the other hand, if more numbers of dwelling units are provided with higher density norms and with supporting infrastructure, in new urban extension areas, the overall average Density would remain the same. The overall number of dwelling units added at city level would be same in both these cases (i.e. having MPD 2021 density same in all

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the areas; or providing lower densities in existing areas and higher densities in new urban extension areas). The cost of supporting infrastructure to higher densities can be factored in respective Government charges while planning infrastructure and services in these new areas.

- Any charges levied by the Government are based on FAR and not on Dwelling Units.
   Most of these Charges are for the sole purpose of up grading the existing infrastructure.
   Since FAR being the same, the Government revenue would not be affected, but the
   density norms would have gross adverse affect on the outflow, scale, pace and quantity of
   up gradation of existing infrastructure.
- Thus allowing less number of dwelling units would require less time, money and efforts on the part of Government to upgrade the existing trinstructure and this would considerably reduce the time of creation of housing stock.

Hence, there is an urgent need to re-look upon the issue of density of MPD 2021 for Group Housing schemes in Delhi. We would like to recommend two pronged density norms specific to Existing Urban Areas and to New Urban Extensions:

# a. **EXISTING URBAN AREAS:**

- 1. In the existing built-up areas the land has limited holding capacity in terms of provision of trunk infrastructure, limited capacity of roads to handle additional traffic and required community facilities
- II. The urban form of these existing urban areas would also get disturbed with haphazard re-densification without any comprehensive re-densification scheme.
- III. In new areas higher density should be provided hence balancing the overall average density of the city.

Example: In an existing area with MPD 2021 density, the various scenarios would be as following:

- i) With new density norms as per MPD 2021
  - a. <u>Category-I</u> (upto 40 Sqm dwelling size) density 500 DUs/Ha, the number of units would be 500 per Hectare;
  - b. <u>Category-II</u> (40-80 Sqm dwelling unit size) density 250 DUs/Ha, the number dwelling units would be **250 per Hectare**; and
  - c. <u>Category-III</u> (above 80 Sqm dwelling unit size) density 175 DUs/Ha, the number of dwelling units would be 175 per Hectare.
- ii) It is clear from above that, in this particular case, the number of dwelling units in one Hectare of land will be varying from 500 to 175, irrespective of capacity of existing infrastructure to take this additional load.
- iii) If a maximum limit of density is fixed for an area, without any restriction of dwelling unit sizes and minimum density, then the owner will have flexibility of numbers, mix and sizes of various types of dwelling units, maximum upto that fixed limit of density based upon the demand in that area. E.g. in a One Hectare plot, where a maximum density is fixed as 175 DUs/Ha, without any dwelling unit size restrictions, various sizes of dwelling units in any numbers and mix, maximum upto 175 can be made. This will add more flexibility of types of dwelling units in a plot.

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iv) If mostly larger dwelling units are made then less number of dwelling units would be constructed, which, in turn, would relieve pressure on existing infrastructure, without any loss of revenue to the Government in terms of additional FAR charges and other levies.

### Proposal:

- 1. In existing built-up areas, for Group Housing schemes, the MPD 2021 density norm with slabs of dwelling unit sizes should be removed.
- 2. An upper limit of residential density in terms of persons per hectare should be fixed for all existing built-up areas of Delhi as the holding capacity in these areas has already exhausted. Moreover, additional FAR is being allowed by way of redevelopment delines with amalgamations of plots and the current density norms are allting in more number of dwelling units and putting unnecessary pressure on existing infrastructure. Hence, there should be a cap on maximum density in all existing areas of Delhi.
- 3. The flexibility should be given to have any size, mix and number of dwelling units maximum upto that fixed limit of density of that area, based upon the demand in that area.

## b. **NEW URBAN EXTENSIONS:**

- I. The urban extensions can have MPD 2021 density norms with adequate flexibility;
- II. Since all new developments will take place in these areas and there will be sizeable addition of DU's and population, which cannot happen in already existing urban areas because of lack of services and infrastructure. Hence these areas should have High Density with adequate flexibility to cater to all sections of society.
- III. The higher density provided in these new areas would adequately compensate the lower densities in existing areas. This will allow more number of people in well planned new urban extensions.
- IV. Also in order to overcome the limitations of existing areas, these new areas can be planned in such a way that adequate infrastructure provisions like wider roads, transportation, services, community facilities etc can be created so as to accommodate more people in these areas.

Example: For any area, if category III (more than 80Sqm) dwelling units are proposed then for corresponding density of 175 DUs/Ha, variation from 131.25 DUs/Ha to 218.75 DUs/Ha (+/- 25%) should be permitted.

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#### Our Proposal:

I. The higher Density should be provided in these areas as these new areas can be planned with adequate infrastructure provisions

II. These high density norms for Group Housing should be applicable only to new urban extension areas with density flexibility i.e. +/-25%. (in place of

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present +/- 10%) to have different mix of Du's so as to serve different sections of society in these areas.

III. These higher densities will overcome the limitations of infrastructure up gradation in existing built-up areas with the lower densities as these new areas can be planned in such a way that adequate infrastructure provisions like wider roads, transportation, services, community facilities etc can be created so as to accommodate more people in these areas. Hence the total average density as well as total population carrying capacity of the city remains the same.

This is to request you to consider a relook into the flexibility of Density Norms as proposed above and this issue may be taken up for public suggestions, objections as it may have long term impact on the overall development of the city under MPP 2021.

With regards,

Yours sincerely,

Brig (Retd.) R R Singh Director General

## Cc:

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