



PHD CHAMBER OF COMMERCE AND INDUSTRY

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August Kranti Marg, New Delhi-110016 (India)

OFFICE OF THE DIR (Plg.)
MPR/TC, D.D.A. N. DELHI-2
Dy.No.....1429.....
Dated.....18/11/11.....

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16th November 2011

similar as

To,

The Director (Plg), MPR
Delhi Development Authority,
6th Floor, Vikas Minar,
I P Estate,
New Delhi- 110002

Read Central Dy. No.54
Dated17.11.11
R&D Section, Vikas Minar
Delhi Development Authority
Meeting Asstt

Sub: Mid-term review of Master Plan for Delhi 2021

Sir,

This is with reference to the advertisement published in the Times of India publication inviting public suggestions for mid-term review of Master Plan for Delhi -2021.

We take this as one more opportunity to bring in improvements wherever possible. Our Housing & Urban Development Committee at PHD chamber has deliberated upon various aspects pertaining to the Master Plan of Delhi 2021. In the course of our discussion, we have received various suggestions from our members which should help the Master Plan achieve its core objectives. These suggestions are listed as following:

1. Residential Use in Existing Industrial Plots with minimum 15 % Commercial/ Industrial Component:

In case of City of Delhi, all previous Master Plans of Delhi were prepared based upon the pattern of residential development prevalent at that particular time and requirement of augmentation of existing developed areas and finding new areas for future development were always emphasized. MPD 2021 recognizes the fact that there is a net housing shortage of about 1.0 Lakh houses/dwelling units. Moreover, the estimated additional housing stock required by 2021 will be around 24 Lakh dwelling units.

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It has also been recognized in MPD 2021 that around 40% of housing need can potentially be satisfied through redevelopment/up-gradation of existing areas of Delhi. Para 3.3 of MPD 2021 stresses upon the need for redevelopment of existing planned areas in view of "limitation of buildable and urbanisable land in Delhi." The redevelopment may not be kept limited to existing residential areas but may be extended to other Use Zones also, to meet the target.

However, the residential areas have been further shrunk under the same MPD 2021 by stipulations of Chapter – 15: Mixed Land use of MPD 2021, where commercial uses have been permitted on notified road in residential areas. This will result in more supply of commercial spaces at the cost of residential spaces.

There should be some effort to compensate this loss of residential area by way of allowing residential use in Industrial Plots. Pursuant to the Hon'ble Supreme Court's Order dated 10.05.1996, large Industrial lands have been made available for redevelopment because of closing and relocation of large and heavy industries. All these lands which are more than 2000 Sqm in area, are surrounded by large tracts of green areas and are conducive for residential development. In fact, staff housing has traditionally been part of large industrial estates, and hence residential use has been existing in Industrial areas.

In MPD 2021, the Land use "Manufacturing" has been replaced by Land use "Industrial" with only two Use premises – "Industrial Plot" and "Flatted Group Industry". It has also been provided in MPD 2021 that "Industrial Units/Plots abutting 24m ROW and above shall be eligible for conversion to commercial use within the existing development control norms, subject to payment of conversion charges The activities permitted in local shopping centers will be permitted in such plots."

As per MPD 2021, the land area required for "Local Shopping Center" is 0.30 Ha (3000 Sqm). But most of these vacated sites are much more in area than required for "Local shopping Centers". Thus redeveloping these Industrial lands as per Industrial Development Control Norms and then converting them for commercial use of local shopping centers, is totally unviable. The main reason would be a huge amount of commercial space would be available without sufficient supporting residential populations around these areas. In fact, based upon the area of the plot, the activities permitted in higher commercial tiers (such as Community Center etc.) should also be permitted.

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It is therefore, suggested that in order to make the redevelopment sustainable, existing Industrial plots having area commensurate to the threshold size of plots of group housing and industrial use premises, as per MPD 2021, should be allowed to have residential Group Housing development with minimum 15% of commercial component. While commercial component is to be allowed with existing development control norms, the residential Group Housing development should be allowed with development control norms of "Group Housing" with enhanced FAR. The reason for proposing differential development control norms is that the development control norms of Group Housing are entirely different from that of Commercial or Industrial use premises. This is clear from the example that a building constructed with Industrial (Flatted Group Industries) development control norms, can easily be used for commercial use premise or vice versa. But the same building cannot be used for Group Housing use premise or vice versa. All supporting community facilities should be permitted on 'Accommodation Reservation' basis (i.e. allowing construction of community facilities without counting in FAR, as already envisaged in clause 3.2.2 "Guidelines For Redevelopment Schemes", in MPD 2021), to incentivize the development of Residential Group Housing use, in place of total commercial development of these sites.

In Mumbai, there is a separate categorization of industrial use zone where residential use is permitted along with commercial use. This way the land use has been retained as "Industrial" but plots under that Industrial Use Zone can be developed for residential and commercial uses. This can be adopted in Delhi also.

This residential and commercial development should conform to all the norms of MoEF clearances in terms of energy efficiency and with provisions of on-site management and disposal of waste water and solid waste as per MoEF guidelines.

This would make a significant contribution towards housing stock, including Community Personnel/EWS category housing as these are to be created along with Group housing as per MPD 2021 provisions. Secondly, this housing stock would be created in already developed areas of city with ample infrastructure. This would considerably reduce the capital investment in creating the trunk infrastructure. The optimum utilization of land would also be ensured.

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In terms of Chapter 17, sub clause 8 (2) of MPD 2021, Old Age Homes, Hostels, Night Shelters etc are already allowed in Industrial use zone. Since these uses are residential in nature, the same logic can be extended to allowing residential development in the industrial land uses.

Para 7.6 of MPD 2021 lays down that "there is a need for modernization and up-gradation of the existing industrial areas with due regard to environmental consideration. Since several of the areas are located along the Mass Public Transport Corridors such as Delhi Metro, BRT corridors and proposed Regional Rapid Transport System (RRTS), there is also a need for optimizing the use around these areas through the process of redevelopment.

Therefore the following amendments are required in MPD 2021-

Amendment 1: In Chapter 17, sub clause 8 (2) of MPD 2021 "to permit Group Housing use premise in industrial use zones".

Amendment 2 : In clause 3.3.2 by adding " Group Housing activity to be permitted in industrial Land use as part of redevelopment/re-densification strategy, with group housing development control norms, with additional FAR of 50% as an incentive. The required community facilities to be provided on 'Accommodation Reservation' basis to further incentivize this development."

Amendment 3: In Table 7.3: Development Control Norms of Industrial Land use, in Notes (vi), after the line "Industrial units/plots abutting roads of 24 m ROW and above shall be eligible for conversion to commercial use within existing development control norms,...The activities permissible in local shopping centers will be permitted in such plots." add "Group Housing activity in existing Industrial plots having area commensurate to the threshold sizes of plots of group housing and industrial use premises shall be eligible for residential group housing development with minimum 15% of commercial/industrial component.

While commercial/industrial component shall be permissible within existing development control norms, the residential group housing development will be governed by the development control norms of "Group Housing" with enhanced FAR and with all supporting community facilities on 'Accommodation Reservation' basis to incentivize the development of Residential use in these lands."

2. DENSITY FLEXIBILITY:

In Housing Strategy of **MPD 2021**, emphasis has been laid on optimum utilization of land with a view to increase net residential density. As per Clause 4.2, it is envisaged that "...a fixed density could lead to under utilization of FAR or imposition of artificial limits to optimal use of land, which

is a scarce commodity". Based upon this argument the **MPD 2021**, for the first time, has introduced the following density norms with corresponding category of dwelling unit (DU) sizes:

Slum/EWS housing	(upto 30 sq.m)	- 600 DUs/Ha
Category I	(above30-upto 40sq.m.)	- 500 DUs/ Ha
Category II	(above40-upto 80sq.m.)	- 250 DUs/ Ha
Category III	(above80sqm)	- 175 DUs/Ha

As per Clause 4.4.3 B (i) a variation of 10% is allowed as flexibility in the density norms. In practice, this argument that fixed density would lead to underutilization of FAR and impose artificial limits to optimal use of land, does not hold good. By categorization of density with respect to dwelling unit sizes would lead to heterogeneous densification and may put undue pressure on existing trunk infrastructure.

For a threshold plot size of group housing, i.e. 3000 Sqm with FAR of 200 the maximum and minimum numbers of dwelling units permissible and average sizes of dwelling units are as following:

Category specified	No. of Dwelling Units			Range of average sizes of DUs. (Sqm)
	Density	+10% variation	-10% variation	
I (500 DUs/Ha)	150	165	135	36.37 Sqm – 44.44 Sqm
II (250 DUs/Ha)	75	83	68	72.29 Sqm – 88.24 Sqm
III (175 DUs/Ha)	53	58	47	103.45 Sqm – 127.66 Sqm

It is therefore observed that the range of number of dwelling units permissible is 47 to 165, while the range of average dwelling unit size is from 36.37 Sqm – 127.66 Sqm

As per MPD 2021 the variation of plot sizes and number of dwelling unit allowed, based upon table 4.4.3. A Residential Plotted Housing :

S. No.	Range of Plot Areas (in Sqm)	Avg. Plot area in the category (in Sqm)	Range of plot sizes available in the category for from average plot area (%)
1	Below 32	--	--
2	Above 32 - 50	41	+/- 21.95%

3	Above 50 - 100	75	+/- 33.3%
4	Above 100 - 250	175	+/- 42.85%
5	Above 250 – 750	500	+/- 50%
6	Above 750 – 1000	875	+/- 14.29 %
7	Above 1000 – 1500	1250	+/- 20%
8	Above 1500 – 2250	1875	+/- 20%
9	Above 2250 – 3000	2625	+/- 14.28%
10	Above 3000 – 3750	3375	+/- 11.11%
11	Above 3750	--	--

It is observed that variations available are from +/- 11% to +/- 50% in residential plotted housing in MPD 2021. This concept of density categorization is applicable comfortably in cases where, different sizes of dwelling units are provided in the separate building blocks in a Residential Development Scheme but where blocks are designed with a mix of different sizes of dwelling units for different income categories in the same block, the applicability of these differential density norms becomes restrictive.

Similarly, these norms are not suited uniformly to all areas, as some areas are already densely populated. Thus these differential density norms do not do justice to the already exiting urban areas of the city. As per clause 4.2 "HOUSING STRATEGY", *"these norms and controls (such as planning norms, land use zoning, density, FAR and building controls) should also be reviewed periodically (preferably every five years) by DDA and suitably modified/ updated to meet the requirements of the citizen"*.

Hence it is suggested that:

1. There should be one designated density for each Zone which would be applicable to any group housing development in that Zone of the City.
2. The dwelling unit below 25 Sqm plinth area should not be counted as a dwelling unit for the purpose of density.
3. The flexibility of density should be +/- 30% from the designated density of that zone. The range of +/- 11 to +/- 50% is already available in case of Residential plots. This would provide ample scope of flexibility in terms of sizes of dwelling units affordable to all sections of the society. The concept of a designated density for a zone as applicable in MPD 2001 should again be revived the city.

✓ 3. ENHANCEMENT OF F.A.R. AND NO-RESTRICTION OF HEIGHT FOR COMMERCIAL, PUBLIC-SEMI PUBLIC FACILITIES:

In MPD 2021, it is recognized that developable land is a constraint in the National Capital Territory of Delhi (NCTD). To accommodate the projected additional population in the city, the measure like increase in density norms, upward revision of height limits (No Restriction in some cases) and increase in FAR have been incorporated in MPD 2021.

Due to severe constrain on developable land it is always preferred to do vertical development which utilizes less land area, allow more space for greening, roads and parking on surface, which improves the quality of life. This also provides space for laying better infrastructure which, in turn, increases the population holding capacity of the land. Services become cheaper, transportation linkages become better.

In MPD 2021, the FAR has been increased and height restrictions have been relaxed/ removed for various levels of commercial and social infrastructure use premises. There is scope of further increase in FAR and removal of height restrictions which would further increase supply of planned commercial and social facilities for the city population. This will reduce the horizontal expansion of the city and would reduce cost of providing transportation infrastructure, reduce pollution and would reduce the carbon foot print of the city as a whole.

In Clause 3.3.2. of MPD 2021, Guidelines for Redevelopment Schemes have been stipulated. In this clause at para (v) it is mentioned that "*To incentivize the redevelopment a maximum overall FAR of 50% over and above existing permissible FAR on individual plots subject to maximum of 400 shall be permissible.*" This benefit of 50% more FAR should be extended to all the use premises including commercial and social facilities, in order to match the re-densification of residential areas as envisaged in these redevelopment guidelines.

It should be recognized that when land optimization is the basic crux of MPD 2021, the restriction of heights should be removed and this should be fixed by DAUC on case to case basis. The FAR should be increased across the board commensurate with the enhanced FAR as per re-development guidelines.

Keeping in view the benefits to the city, the following specific modifications in commercial and social facilities are suggested in MPD 2021:

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Chapter-5: Trade & Commerce**Table 5.4 (a) (i) & (ii): Convenience Shopping Center/ Local Shopping Center/ Local level Commercial areas:**

The FAR should be increased to 150 height should be NR. The configuration of the buildings should be left to developers according to specific locations and needs.

Table 5.4 (a) (iv): Community Center/ Non-hierarchical Commercial Center:

The FAR should be increased to 200 for the same reasons as above.

Table 5.4 (a) (v) and (b) District Centers/ Sub-Central Business District/ Sub-City level Commercial Areas; Metropolitan City Center/ CBD:

The FAR should be increased to 250(it was so in the CBD) because a city centre or "secondary" city centres will always have strong demand and since there is a shortfall in Tier I and Tier II developments (clause 5.4), maximisation of the existing ones is necessary.

Table 5.4 (c) HOTELS –

The FAR should be further enhanced to 50% more of MPD 2021.

Chapter 13: Social Infrastructure

When land usage is being optimised (e.g. group housing), the requirement of social infrastructure would also increase due to increase of population in same area. Rather than providing several units of social infrastructure, which will consume already scarce land, existing social infrastructure sites should be given proportionate increase in FAR & no restriction in height.

The social facilities have been neglected in terms of enhancement of FAR and relaxation of heights over the last two masterplans. In MPD 2021 some initiatives have been taken to increase the FAR and heights but it is still insufficient.

In many of the specific facilities, the development control norms need a review and rationalisation.

For example **Health Facilities:**

Table 13.2

The FAR range should be increased to 50% more than permissible in MPD 2021. The reason is land for health facilities is scarce and being able to provide more facilities in a given land area serves the population better and brings down project cost and consequently treatment costs. The height should also be NR (subject to AAI, ASI, DFS etc.) because in the present day, hospital planning in the vertical format is a prevalent practice and vertical transportation is very easily handled.

Table 13.2 Note 1 & 2a

Plot area and number of beds cannot be linked because this ratio is dependent on the type of medical facility (extent of general wards, rooms, specialisations, diagnostics, operation theatres etc.). Generalisation of this standard would not serve the purpose as requirement of various levels and types of Hospitals are different.

4. AMALGAMATION OF PLOTS

Amalgamation and reconstitution of plots has been permitted by MPD 2021 for planning purposes for Redevelopment schemes. The same concept should be extended to all the plots whether part of redevelopment scheme or not, wherever a plot owner(s) want(s) to amalgamate the adjacent plot for unified, coherent and efficient planning.

Some of the use premises of MPD 2021 could only be availed by amalgamation of plots where a certain threshold plot size is mentioned. By amalgamation of plots the quality of development will improve and it would help in decongestion and environmental improvement of the localities, already under pressure of over spilling parking on public road and less space for greenery.

These amalgamated plots will provide services within these plots, to make the development self-sufficient. The provision of parking and landscaping inside these amalgamated plots will be more efficient, contiguous and visually spacious. There may not be a limit on maximum size of

the amalgamated plots, rather it needs to be encouraged in view of economy of space and more parking available on surface. The minimum size of amalgamated plots may conform to the threshold sizes mentioned in the MPD 2021 for various use premises.

5. SUBDIVISION OF PLOTS

With MPD 2021 enhancing the FAR for most of the use premises, with the condition of payment of additional FAR charges at the prescribed rates, it becomes economically unviable for a land owner to avail the benefit of full FAR. The subdivision of plot shall give the opportunity to the owner to avail the FAR affordable to him.

While allowing the subdivision of plots, the local bodies should ensure the right of way, provision of parking requirements inside the plots and other specific requirements of the use premises of each subdivided plot are met.

If above conditions are met, then there should not be any limit for maximum size of subdivided plots. The minimum size of the subdivided plot should conform to the threshold sizes mentioned in MPD 2021 for various use premises.

6. NORMS FOR ENHANCED F.A.R. AS PER MPD 2021 FOR EXISTING COMMERCIAL CENTERS

The MPD 2021 recognizes that out of total 23 District Centers planned till date, only ten have been developed, some of those are developed only partially. This has put a severe constraint on supply of planned commercial space in the city. This has manifested in unauthorized commercialization of residential and industrial areas. The Master Plan of Delhi 2021 has proposed enhanced F.A.R. for various levels of commercial development as per table 5.4. This has been done to increase the supply of planned commercial space in the city which is deprived of it since the implementation of last two Master Plans of Delhi.

In this table 5.4, as per Note (v), it is stated that- :

"Wherever redevelopment of existing commercial areas stipulate preparation of comprehensive scheme, the same can be initiated jointly by the lessee/owners themselves and submitted to land owning agency/planning authority for approval. Wherever any enhancement in FAR is approved, the same will be subject to charging of appropriate levies from the beneficiaries. For Metropolitan City Centers, in Special Areas, development control shall be as per approved scheme."

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The existing Commercial Centers are comprehensive schemes, and it seems in order to take benefit of enhanced F.A.R. in these Commercial Centers as per MPD 2021, revised comprehensive scheme would be required to be made by all the lessees/owners, which is highly impractical. As per above stipulations unless a revised comprehensive scheme is prepared and approved by land owning agency/ planning agency, the benefit of enhanced supply of planned commercial space will not be available to the society and the purpose of enhancing the F.A.R. in MPD 2021 would be defeated.

It is therefore suggested that:

The process of availing the benefit of enhanced F.A.R. needs to be made practical. For this a comprehensive scheme providing enhancement of pro-rata FAR to each lessee/owner should be prepared and approved by the land owning agency/ planning authority in consultation with DUAC for the entire Commercial Center.

Wherever architectural controls and height restrictions are applicable, those should be relaxed with the consent of DUAC.

Then individual lessee/owner of plots in an existing Commercial Centers should be allowed to prepare building plans to utilize the enhanced FAR, on pro-rata basis, as approved above, for their individual plot keeping in view that the functioning of the Commercial Center is not adversely affected, and submit it to the land owning agency/ planning authority for approvals. Any change in parking standards etc. should be applicable to the extent of enhanced FAR only.

7. NORMS FOR ENHANCED F.A.R. AS PER MPD 2021 FOR GROUP HOUSING SCHEMES

In MPD 2021, the F.A.R. for group housings has been increased from 167 to 200. This has been done to increase density of residential development, the housing stock and for optimum utilization of land. The existing group housing schemes sanctioned under MPD 2001, with 167 FAR could also like to take benefit of this enhanced FAR. The constraint in this process is the new stipulations of group housing in MPD 2021, such as enhanced parking norms, provision of dwelling units for Community Services personnel/ EWS category to the extent of 15% of FAR or 35% of dwelling units, whichever is more, and enhanced density norms being applicable to full FAR – earlier sanctioned as per MPD 2001 and enhanced FAR as per MPD 2021.

In order to facilitate the existing group housing schemes to get the benefits of enhanced FAR for increasing the housing stock supply, in already sanctioned schemes under MPD 2001, the new/enhanced stipulations should be applicable to the extent of enhanced FAR as per MPD 2021 only.

DDA has already started the process of amending MPD 2021 in terms of enhanced parking stipulations being applicable only to the additional FAR allowed over MPD 2021. Similar amendments should be done for the rest of the enhanced stipulations such as density norms and provision of EWS dwelling units to be applicable to the extent of enhancement in FAR by MPD 2021 and not the entire FAR in group housing schemes.

The reason being most of the group housing schemes sanctioned under MPD 2001, are already developed/being developed and provision of stipulations like parking, density and EWS have already being made as per MPD 2001. There is very limited scope of enhancing these stipulations to meet the requirement of full FAR with new stipulations as per MPD 2021. This relaxation would relieve the constraint from existing group housing schemes and would facilitate creation of additional housing stock.

Thanking you,

Yours faithfully,



(Dr. Ranjeet Mehta)

Secretary
Infrastructure, Energy, Housing & Urban Development