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Date 21/11/11

THE ASSOCIATED CHAMBERS OF COMMERCE AND INDUSTRY OF INDIA

D S RAWAT

Secretary General

November 15, 2011

Director (Pig.) MPD-2
J.D.A. Vikas Minar N. DELHI-2
Dy.No. 1548
Dated 25/11/11

Commr. (Pig.) - II
Diary No. 614
Date 23/11/11

Dear Shri Patnaik

**ASSOCHAM SUGGESTIONS FOR
MID – TERM REVIEW OF MASTER PLAN FOR DELHI – 2021**

Kindly refer to the DDA Advertisement inviting public suggestions for Mid –Term review of Master Plan for Delhi (MPD-2021) informing that this review is being undertaken to provide realistic Mid – Term corrections and modifications in the Master Plan Policies, Norms / Standards and the implementation procedure, etc to suit the changing needs of the Society.

In this context, we are enclosing a representation suggesting modifications in certain provisions and specific aspects of the plan.

We shall be grateful if our suggestions are considered during the process of mid-term corrections of the Master Plan for Delhi-2021.

Looking forward to hearing from you and with kind regards,

Yours sincerely,

(D S Rawat)

Shri G.S.Patnaik
Vice-Chairman
Delhi Development Authority
Vikas Sadan
I.N.A.
New Delhi 110 023

21/11
Com (Pig) - II

O.S.D. (Pig.)
Diary No. 309
Date 24/11/2011

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29/11

SUGGESTIONS FOR MID-TERM REVIEW OF MASTER PLAN FOR DELHI - 2021

THE ASSOCIATED CHAMBERS OF COMMERCE AND INDUSTRY OF INDIA

1, Community Centre, Zamrudpur, Kailash Colony, New Delhi-110048
Ph: 91-11-46550555 Fax: 91-11- 46536481/2, Website: www.assocham.org

Issues and Suggestions pertaining to Mid-term review of Master Plan of Delhi 2021:

S.N O.	ISSUES	SUGGESTION
1	<p><u>Modifications in Development Code:</u></p> <p>- Medical Facilities</p> <p>- Basements</p> <p>- Conservation of resources</p> <p>- Requirement of revision of Approved Layout</p>	<p>There should be abundant hospital facilities in zones where people live and work. The number of beds should be a function of the available plot size, catchment area, population, external patients and the planning of the hospital facilities. The provision restricting number of beds to 100 in use zone PS should be done away with.</p> <p>The city needs more parking provision. Sub clause 8 (5) (a) should be amended by deleting the words "maximum equivalent to" and replacing by "for" because the existing provision is a deterrent to providing parking beyond the mandatory requirement of ECS.</p> <p>It is impossible to understand and interpret this provision under sub clause 8 (5) (b) because of the contradictory words "above" and "flush". In the present day scenario basements are mechanically ventilated and artificially lit and should be flush with the ground.</p> <p>Para 8 (5) (d) is also unnecessarily restrictive when it stipulates that, "In case the basement is used for activity in conformity with the use premises, wherever permitted," is ambiguous and "wherever permitted" should be deleted because "in conformity with the use premises," is already a precondition. Thus dual restriction has no meaning.</p> <p>Sub-Clause 8 (2) – The condition of "(as part of Approval of Layout plan...) is a restrictive stipulation, as change in Development Control Norms allowing a particular use premise on an individual plot does not require any change in the Approved Layout Plan. Hence, it is</p>

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	<p><u>major transport corridor</u></p>	<p>stations and major bus terminals etc.</p> <p>Besides, distance needs to be measured from the transport hub and not from the route per se because the commuters have to walk up to the station and not to a point on the route.</p> <p>The MPD 2021 allows an incentive F.A.R. with a cap of 400. This implies that the incentive F.A.R. for re-densification along the major transport hubs will be available over and above the all other possible F.A.R. incentives, subject to a cap of 400. This needs to be firmly stated in the policy document to avoid conflicting interpretations by different agencies which, often, defeat the very purpose behind the policy.</p> <p>In case of large schemes, block/ pocket boundary should be considered as one scheme for this purpose". To cover maximum number of eligible plots under the scheme, it would be advisable to include all the plots with 50% the area inside the influence zone.</p>
4	<p><u>Atrium in Commercial and residential buildings</u></p>	<p>The sky light on top of atrium should not be mandatory and the coverings of atrium by floors/slab should also be allowed as per architectural design requirement. This will facilitate provision of multiple atrium spaces appropriately distributed throughout the height of the tower structure at multiple floors.</p> <p>The provision of Atrium, may be 100 Sqm or 2% extra ground coverage and free of FAR, whichever is more, should be given to Residential Group Housing projects also. Any extra area provided in these atria, which is more than required as per above stipulations, can be counted towards Ground coverage and FAR.</p>
5	<p><u>Areas free from FAR:</u></p> <p>-Staircase and</p>	<p>By providing these as free of FAR areas, the designer may provide more generous corridors & staircases without sacrificing usable FAR. Staircases and Corridors are provided as free of FAR in Kolkata &</p>

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<u>Enhancement of additional floor area for community/recreational hall and senior citizens recreation room</u>	<p>slabs of stilt and adjoining ground floor. In order to negotiate this level difference, an extra slab needs to be cast, which becomes unviable in large schemes.</p> <p>If the objective of 2.4 m is to avoid misuse, then the example of basements should be seen, which are meant for parking and have no restriction of minimum height. This will facilitate parking of bigger vehicle and would also create possibility of provision of mechanical parking, wherever required.</p> <p>There should not be any restriction in providing these additional areas in more than one 'Community Centres' within the same plot of group housing, in order to adequately distribute these facilities, in large plots. The restriction of 400 sq mt should be replaced with "percentage of the F.A.R." say 5-7% of F.A.R. of the group housing scheme. Similarly, restriction of 100 sq mt for senior citizen recreational facilities should be replaced with 1-2% of F.A.R. These kind of facilities can be provided in the form of a "Community Club" which is demand of modern group housing schemes.</p>
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1. SUGGESTIONS REGARDING CHAPTER 17 : DEVELOPMENT CODE

In addition to dwelling upon policy matters and development control norms, there are certain specific provisions in Chapter 17: Development Code of MPD 2021 which are currently ambiguous or are not conducive to development or cannot be implemented.

A. **MEDICAL FACILITIES:**

Augmenting medical facilities is a major need not only for the capital's ever growing population but also because Delhi will always be the referral city for a large part of North India.

Keeping this in view, we find Table under 8 (2) S.No. PS (i) is not helpful because there is no apparent rationale for restricting the number of beds to 100 for Use Premise Hospital in Use Zones RD, C₁ and PS and for NP in Use Zones C₂ and M. There should,

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In certain usages it may be desirable to use basements for activities other than services and parking. These other uses would count towards FAR but MPD 2021 should facilitate this requirement which it currently does not because Para 8 (5) (d) states "In case the basement is used for activity in conformity with the use premises, wherever permitted," is ambiguous and "wherever permitted" should be deleted because "in conformity with the use premises," is already a precondition. Thus dual restriction has no meaning.

C. CONSERVATION OF RESOURCES:

- Reducing capital costs, operating costs and energy costs must be of primary concern and needs attention. One step towards achieving this objective would be sharing the services like air-conditioning; grid & DG power facilities & distribution; water treatment; sewage treatment and any specialised services between adjoining buildings if the owners agree to do so. MPD 2021 must facilitate this by allowing services ducts/tunnels below ground or overhead bridges with stipulated height clearance. Such connections will necessarily cut through setbacks but the functional need of the setbacks will not be compromised.

Such a provision will bring about economy of scale, conservation of power, lower carbon footprint etc. and is the need of the time due to environmental considerations. In fact in

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should also be permitted free from FAR based upon the feasibility and requirements of services.

F. ECS Norm:

MPD 2021 has revised ECS norms upwardly across all the use premises. This has been done to address the need to provide on-site car parking for ever increasing numbers of cars in the city of Delhi. Moreover, large projects are being implemented particularly in residential, commercial and industrial use premises.

As per MPD 2021, in Clause 8(5)(a) of Chapter – 17 DEVELOPMENT CODE, "Basement(s) up to setback line maximum equivalent to parking and service requirements..... could be permitted and not to be counted in FAR". In larger schemes the ECS requirement as per Development Control Norms of a particular use premise is such that huge basements are required to be constructed to meet the ECS requirement, while actual car parking lots accommodated are more than the ECS numbers. Now a days the average size of the car parking lot has shrunk to 2.3m x 4.5m for small cars which constitute the majority of car parking needs of a use premise. Hence creating a basement bigger than required is a wasteful expenditure.

Similarly in several smaller projects the actual car parking lots in their basements are less than the ECS requirements.

Hence it is suggested that - the car parking should be permitted either as per ECS requirement or actual car parking lots (based upon an average size of each lot as 2.3m x 4.5m and average driveway width of 5.5m), whichever is more. This provision will even out both the situations explained above.

2. BENEFITS OF REDEVELOPMENT GUIDELINES TO OTHER INDUSTRIAL

PLOTS:

The Govt. Of India, vide Gazette notification dt. 01 April 2011, has notified the "Regulations and Guidelines for Redevelopment of Existing Planned Industrial Areas." These are applicable to Industrial plots which are part of approved layout plans of various industrial areas. There are several Industrial plots which do not fall in any approved Layout Plans but these are approved authorized Industrial plots. The above referred regulations and guidelines are not applicable to these Industrial plots.

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- C. In view of the two submissions made above, it will be a more practical and useful idea to have an influence zone within a radius of 1 km. from the major transport hubs i.e. metro stations and major bus terminals etc. Distance needs to be measured from the transport hub and not from the route per se because the commuters have to walk up to the station and not to a point on the route.
- D. The MPD 2021 allows an incentive F.A.R. with a cap of 400. This implies that the incentive F.A.R. for re-densification along the major transport hubs will be available over and above the all other possible F.A.R. incentives, subject to a cap of 400. This needs to be firmly stated in the policy document to avoid conflicting interpretations by different agencies which, often, defeat the very purpose behind the policy.
- E. Para 3.3.1.1 of the MPD 2021 also lays down that “Entire approved layout plan of a scheme will be included in the zone if more than 70% of the plan area falls inside the influence zone. In case of large schemes, block/pocket boundary should be considered as one scheme for this purpose”. To cover maximum number of eligible plots under the scheme, it would be advisable to include all the plots with 50% the area inside the influence zone.

Therefore, necessary guidelines may be issued to implement the mandate given by MPD 2021 for creating influence zone along the MRTS/ Major Transport Corridors. However, such guidelines may take due cognizance of the situation on the ground and include certain modifications as suggested above.

4. ATRIUM IN COMMERCIAL AND RESIDENTIAL BUILDINGS:

In MPD 2021, atrium has been allowed in Commercial Centers and Hotels with 10% extra ground coverage. It is a welcome initiative as it has given an opportunity to provide an ambiance to commercial centers.

DDA Technical Committee, vide it's meeting dt 16 January 2008 has permitted the use of skylights over these atrium spaces. It has also recommended that the MPD 2021 should be

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To give a better quality and facility to the large number of residents of these group housings in terms of common areas, the provision of Atrium may be 100 Sqm or 2% extra ground coverage and free of FAR, whichever is more, should be given to Residential Group Housing projects also. Also any extra area provided in these atria, which is more than required as per above stipulations, shall be counted towards Ground coverage and FAR.

5. AREAS FREE FROM F.A.R.:

The MPD 2021 makes provision of certain areas to be given free from FAR. Some provisions are allowed free from FAR as per Delhi Building Bye-Laws. There is further scope of increasing this list which would result in better provision of services and facilities in various buildings.

Some of the suggestions are as following:

- A. Staircases and Corridors - In a high rise building, the fire exit route / corridor leading to the staircases are crucial areas for safety of occupant's life. Presently both these areas, staircases and corridors/ route leading to them, are counted in FAR because of which invariably these are provided to the minimum dimensions as per NBC/ bye-laws, to maximize the usable FAR. If these are provided as free of FAR areas, the designer gets the flexibility of providing more generous corridors & staircases without sacrificing usable FAR. In some cities like Kolkata & Mumbai, it is already provided as free of FAR.
- B. Service Areas on Ground, Upper and Terrace Floors - In modern high rise buildings, the requirements of services are such that these are mandatorily have to be provided on Ground, upper or terrace floors. The services areas in Basements are free from FAR. Hence this logic should be extended to Service areas on ground, upper and terrace floors also, and all the service areas on ground, upper and terrace floors should be allowed free from FAR.
- C. Swimming Pools -
 - a. MPD 2021 has stipulated provision of swimming pool in Group Housing projects as per table 4.3.
 - b. Further as per clause 13.3.3 (i) "To incentivise development of sports facilities and swimming pool (upto maximum 100 Sqm) within group housing areas, schools, clubs etc. Shall not be counted towards ground coverage and FAR."
 - c. Moreover, as per table 13.17 'Development Control of Other Community Facilities', Notes (iii), "In the open area apart from outdoor games/ sports

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6. STILTS PROVISIONS

In Chapter-17: Development Code of MPD 2021, in Clause 8 (3), General Notes 3. "If the building is constructed with stilt area of non-habitable height (2.4 mts.) and is proposed to be used for parking, landscaping etc. The stilt floor need not be included in FAR."

In high rise building, this provision poses following constraints -

- The restriction of 2.4 mts height of stilt becomes impractical as modern day vehicles like SUVs with carrier on top cannot be accommodated in this height after taking into account beams and services.
- While stilt is allowed with max 2.4 mts height, the ground floor heights are to be minimum 2.75 mts. This create a lot of problems in structural design of the building as there is a level difference between roof slabs of stilt and adjoining ground floor. In order to negotiate this level difference, an extra slab needs to be cast, which becomes unviable in large schemes.
- No service areas are allowed in stilts, free from FAR.
- Moreover the stilts below a building provide a big relief at eye level in terms of views and openness.

In modern high rise buildings, the requirements of parking and services are of such a magnitude that, these restrictions make provision of stilts restrictive. Hence the objective of providing stilts is diluted.

It is suggested that -

- A. The height restriction for stilt floors should be removed and should be equal to one floor height (equal to ground floor height if ground floor and stilts are given side by side). If the objective of 2.4 m is to avoid misuse, then the example of basements should be seen, which are meant for parking and have no restriction of minimum height. This will facilitate parking of bigger vehicle and would also create possibility of provision of mechanical parking, wherever required.
- B. The stilt floor should be allowed to be extended beyond building footprint, maximum up to the setback lines (same as basements) as 'Podium'. Over the top of extended stilt floor, landscaping and surface parking should be allowed.

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For modern high rise buildings, the requirements of parking and services are of such a magnitude that these restrictions make provision of stilts restrictive. Hence the objective of providing stilts is nullified.

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- B. The stilt floor should be allowed to be extended beyond building footprint, maximum up to the setback lines (same as basements) as 'Podium'. Over the top of extended stilt floor, landscaping and surface parking should be allowed.

1. These additional areas should be allowed as "Community Clubs", in terms of percentage of Group Housing FAR, such as 5-7% floor area for Community recreational facilities and 1-2 % for Senior Citizens recreational facilities of the total Group Housing FAR.
2. There should not be any restriction in providing these additional areas in more than one 'Community Clubs' within the same plot of group housing, in order to adequately distribute these facilities, in large plots.
3. There should not be any restriction on type of activities in these "Community Clubs" till the time those activities are for community recreational purposes, and should permit at least those which are permitted for "Community Recreational Club" as per table No. 13.27 of MPD 2021 for "Socio-Cultural and Community Facilities".