



NATIONAL REAL ESTATE DEVELOPMENT COUNCIL

O.S.D. (PLG)

Diary No. 365

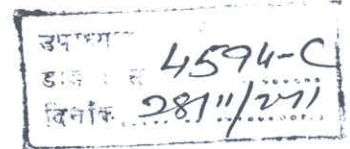
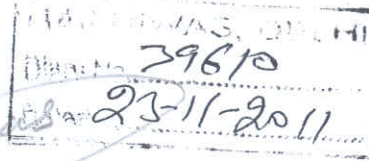
Date 29/11/11

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

Commr. (Fig) - II
Despatch 706
Date 29-11-11

Date: Nov 16, New Delhi

Director (Planning) MPR,
Delhi Development Authority
6th floor, Vikas Minar
IP Estate, New Delhi -110002



Subject: Presentation to Director, (Planning) MPR, by National Real Estate Development Council (NAREDCO)

Dear Sir,

With a view to give thrust to housing and real estate sector in Delhi, NAREDCO is pleased to present its views on certain anomalies in Master Plan 2021, which if considered could help planned and systematic development. Our comments and suggestions are-

1. 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.

2. 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.

3. 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
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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:

- ❖ There should be one designated density for each Zone which would be applicable to any group housing development in that Zone of the City.

- ❖ The dwelling unit below 25 Sqm plinth area should not be counted as a dwelling unit for the purpose of density.
- ❖ The flexibility of density should be $\pm 30\%$ from the designated density of that zone. The range of ± 11 to $\pm 50\%$ 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.

4. 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, in fact, be abundant hospital facilities in zones where people live and work. In any case the relevance of Use Zone M is much diluted because of Table 7.3 Note vi. The number of beds should be a function of the available plot size, the catchment area and its population, expected external patients and the planning of the hospital facilities.
- ❖ Furthermore, there is a major anomaly in this table because hospital beds are restricted to 100 even in Use Zone PS. If there continues to be such a restrictive provision in Use Zone PS, where will larger hospitals be located? This is a further illustration of the need to do away with the cap on beds and leave such parameters to the dynamics of this very important public/semi-public usage.

B) BASEMENTS

- ❖ In modern buildings basements are an essential component for locating services and parking and there should not be any impediment to their construction. There is severe pressure of providing adequate parking spaces in all use premises and spilling over of parking on public roads is a common phenomenon. Moreover, open area inside a plot should be maximized for internal circulation and landscaping.
- ❖ If a developer/promoter wishes to provide parking beyond the mandatory requirement of ECS, MPD 2021 should not be restrictive. But this is not so because Para 8 (5) (a) states "Basements up to the setback line maximum equivalent to parking and services

requirement". This is interpreted as limited to the mandatory ECS requirement and that too the net ECS after counting open parking. To prevent reduced green areas, open parking should largely be for incidental parking and emphasis has to be on basement parking.

- ❖ Since parking in Delhi is a major problem and to facilitate provision of additional parking, Para 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.
- ❖ Providing basements should not affect the functioning or the form or aesthetics of a building. This principally means the top of basements should be flush with the surrounding ground level and this should be stated unambiguously. But this, again, is not so because Para 8 (5) (b) states "basement(s) above the plot level shall be kept flushed with the ground" It is impossible to understand and interpret this provision 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. The basement roof below the building can be raised according to specific requirements of design, engineering, site contours, surface runoff, accessibility etc. and need not be limited to minimum 900 mm to maximum 1200 mm height as per present practice being followed by the local bodies.
- ❖ 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 other countries, basements of properties are not only connected with the adjoining properties but also extend below the public roads and thus whole

development becomes homogenous, which benefits the city (NDMC is considering district cooling in Connaught Place) and can be added to Chapter 17.

D) REQUIREMENT OF REVISION OF APPROVED LAYOUT PLAN:

- ❖ As per Sub-Clause 8(2) PERMISSION OF USE PREMISES IN USE ZONES (As part of approval of Layout Plan or as a case of special permission from the Authority), local bodies are not allowing use premises /activities on individual plots which qualify for that particular use premise as per the Development Control Norms in force, as per MPD 2021, without modification in Approved Layout Plans. This is an 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 proposed that the line within the bracket of above-mentioned sub-Clause 8(2) should be removed, or, no amendment in Approved Layout Plan should be required in case the individual plots qualify for the use premises/activities as per the Development Control Norms in force in MPD 2021.

E) SERVICE FLOORS:

- ❖ As per clause 8(3) 2, the mezzanine floor and service floor wherever provided shall be considered as a part of the total FAR.
- ❖ The service floors are crucial requirement of high rise buildings and are provided for efficient management of building services and for diversion of services where usage at lower floors is different from the upper floors. These floors are to be made of non-habitable heights. By taking them in FAR, their use has been restrictive and would add to the cost of services. For very tall buildings multiple service floors will be required for facilitating fire fighting, pressure reducing tanks fro water supply, signal boosters for communications etc.
- ❖ Therefore it is suggested that service floor wherever provided should be free of FAR. For very tall buildings multiple service floors will be required for facilitating fire fighting, pressure reducing tanks fro water supply, signal boosters for communications etc. These 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) upto 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.

5. 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.

Therefore, it is suggested that – The benefits of additional FAR and removal of height restrictions as envisaged in above mentioned Regulations and Guidelines, should be extended to the other approved authorized Industrial plots which are not part of Planned Industrial Areas.

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.”

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-

- a. 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.
- b. Wherever architectural controls and height restrictions are applicable, those should be relaxed with the consent of DUAC.
- c. 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.
- d. 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.

8. ENHANCEMENT OF ADDITIONAL FLOOR AREA FOR COMMUNITY/RECREATIONAL HALL AND SENIOR CITIZENS' RECREATION ROOM IN GROUP HOUSING PROJECTS

As per MPD 2021, Clause 4.4.3. B Residential Plot- Group Housing, (iii), "Additional floor area up to a maximum of 400 Sqm shall be allowed to cater to community needs such as community/recreational hall, crèche, library, reading room and society office. In addition to above, 100 Sqm area shall be permissible for Senior Citizen Recreation Room."

This provision has been done in order to ensure that all group housing schemes should have community facilities for improving the life style of the society and to address the need for these facilities within the group housing scheme. These kind of facilities can be provided in the form of a "Community Club" which is a demand of modern group housing schemes.

The area of these community facilities has been stipulated as a fixed figure, irrespective of size of the group housing plot. Similarly, activities permitted have also been restricted as mentioned above. In large plots of group housing schemes these fixed areas pose a great constrain in fulfilling the objective of these facilities and remain highly disproportionate to number of residents of these large group housing schemes.

Clause 4.4.3. B of MPD specifies minimum size of a Group Housing Plot as 3000 Sqm. The additional areas specified for Community facilities, are adequate for the residents of Group Housing on this size of plot, which amounts to 6.67% for Community/recreational facilities and 1.67% for Senior Citizens Recreation Room in terms of floor area (with FAR of 200 on 3000 Sqm plot).

Therefore it is suggested that,

- a) 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.
- b) 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.
- c) 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".

9. INFLUENCE ZONE ALONG MRTS & MAJOR TRANSPORT CORRIDOR

MPD 2021 envisages creation of an Influence Zone comprising a "maximum upto 500 metres wide belt on both sides of centre line of the MRTS/ Major Transport Corridor". Para 3.3.1.1. Of the MPD categorizes this Influence Zone as an "Intensive Development Zone", with higher F.A.R. and height. The Guidelines for Redevelopment Schemes laid down in Para 3.3.2 also specify that in such a zone, standards of housing density can also be relaxed, wherever justified.

This one provision in the MPD 2021 can release sizeable supply of urban usable land by ensuring optimum utilization of land along the MRTS network. This will contribute to urban regeneration and will go a long way in significantly reducing the pressure on land for the ever increasing demand for residential and commercial space in a megapolis like Delhi.

However, the first step towards this avowed objective would be the identification and notification of the said 'Influence Zone' by Delhi Development Authority. Towards this end, the following is of material importance:

- a. Major transport corridors, including both existing and proposed metro routes, are a matter of public knowledge. It is quite clear that re-densification along the present transport corridors, including the metro route would be a planner's nightmare.
- b. MPD 2021 considers 15 minute walk to the metro station as the norm (Para 12.4), which means a distance of about 1 km. Most of the studies on optimum walking distance to reach a transport hub treats a distance of 500 to 800 meters as optimum distance for the purpose. However, most of this data is based on the research done in the west. In context of the city of Delhi, it may be reasonable to assume the optimum distance at the higher side of this band at 800 metres.
- 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.

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.

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.

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.

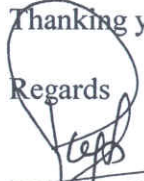
In Mumbai, there is a separate categorization of industrial use zone where residential use is permitted along with commercial use. This way the land use has been retained as "Industrial"

facilities on 'Accommodation Reservation' basis to incentivize the development of Residential use in these lands."

We will appreciate if these issues are sympathetically considered and, if need be, discussed for better understanding. It will be our pleasure to participate in such discussion, if invited.

Thanking you,

Regards


Brig (Retd.) R R Singh
Director General

Copy to –

Shri Kamal Nath
Hon'ble Minister for Urban Development
Nirman Bhawan, Maulana Azad Road
New Delhi-110011

Dr, Sudhir Krishna
Secretary, Ministry of Urban Development
Nirman Bhawan, Maulana Azad Road
New Delhi-110011

✓ **Shri Tejendra Khanna**
Lt. Governor, Delhi
Raj Niwas, Delhi, 6, Raj Niwas Marg,
Delhi-110054

Shri G.S Patnaik
Vice Chairman, Delhi Development Authority
Vikas Sadan, INA, New Delhi

Shri Sanjeeb Kumar Mishra
Director, Delhi Division, Ministry of Urban Development
Nirman Bhawan, New Delhi

Shri Ashok Kumar
Commissioner Planning 1, Delhi Development Authority
5th floor, Vikas Minar, ITO
New Delhi

SP Bansal
Commissioner Planning 1, 5th floor, Vikas Minar, ITO
New Delhi