

Commr. (Plg) - II I-98
Despatch.....
Date..... 9/2/12

OFFICE OF THE DIR (Plg)
MPR/TC, D.D.A. N. DELHI-2
Dy.No. 1860 - 1810
Dated 13/2/12

MOST IMMEDIATE

No. N-11013/6/2012 DDIB
भारत सरकार / Government of India

शहरी विकास मंत्रालय / Ministry of Urban Development

निर्माण भवन / Nirman Bhavan

नई दिल्ली / New Delhi

Dated 2/2/12

Dy. Div. I (Plg.) MPPR-2021
DDA, Vikas Minar N. Delhi
Dy. No. I-385
Dt. 15.2.12

To

✓ The Vice Chairman, Delhi Development Authority, Vikas Sadan, INA, New Delhi. 1	2. The Commissioner, Municipal Corporation of Delhi, Civic Centre, Minto Road, New Delhi-2
The Chairman, New Delhi Municipal Council, Palika Kendra, New Delhi.	4. The Principal Secretary(UD), Govt. of NCT of Delhi, I.P. Estate, New Delhi

Subject:- Residential use in existing industrial Plots with
minimum 15% Commercial / Industrial component

Sir,

I am directed to forward herewith a copy of representation
dated 22-12-2011 received from PHD Chamber of
Commerce and Industry. on the
subject cited above for appropriate action, under intimation to this
Ministry.

Yours faithfully,

Sunil Kumar

(Sunil Kumar)
Under Secretary (DDIB)
Tel.No.23061681

Encl. as above.

AD (MPR) I-385
A.D. (Plg) III
As desired this may be seen
by the A.D. (Plg) III because I am
proceeding on L.T.C.
15/2/12

Secretary
Infrastructure, Energy, Housing & Urban DevelopmentPLAN-15-2472
22nd December, 2011*Honourable Minister,***Residential use in existing industrial plots with minimum
15% Commercial/ Industrial Component**

This has reference to the above mentioned subject. Please find attached the communication from DUAC wherein it has not only complimented our suggestions but has also emphasized the need of implementing the residential developments in industrial areas.

MPD 2021 recognizes the fact that there is a net housing shortage of about 1 lakh units. Moreover, the estimated additional housing stock required by 2021 will be around 2.4 million housing units. Going by the estimates and recognizing the need to increase the house stock in the city, there is an immediate requirement to implement the residential developments in planned industrial areas.

Any increase in Group housing would also cater to the much required EWS/ LIG housing, as it is mandatory to provide 15% of the permissible FAR or 35% of the dwelling units on the plot for the EWS housing in big housing schemes.

PHD has been pursuing the case of maximizing utilization of land resources for housing purposes and DDA has already started the process of amending MPD 2021. We would like to request you to consider our suggestions as well as the views of DUAC, and take steps to formulate and implement the same in the Master Plan of Delhi

Yours Sincerely,

Dr Ranjeet Mehta
Dr Ranjeet Mehta**Dr S P Bansal**
Commissioner Planning-II
Delhi Development Authority
5th floor, Vikas Minar
New Delhi-110 002

- Encl:** 1) DUAC Letter dated 08/12/2011 with ref. no. 18(6)2011-DUAC
2) PHDCCI representation dated 23/05/2011 with ref. no. Plan 15-464
3) PHDCCI letter dated 16/11/2011 with ref. no. IP-15-(Inf)-2211

198

CC : ~~Mr. Kamal Nath~~

✓ Hon'ble Union Minister for Urban Development
✓ Ministry of Urban Development
✓ Government of India
Nirman Bhawan
New Delhi 110 011

Mr Tejinder Khanna
Hon'ble Lieutenant Governor
Lt. Governor's Secretariat
Raj Niwas
Delhi 110 054

Dr Sudhir Krishna
Secretary
Ministry of Urban Development
Government of India
Nirman Bhawan
New Delhi 110 011

Mr G S Patnaik
Vice Chairman
Delhi Development Authority
B-Block, 1st Floor
Vikas Sadan
New Delhi 110 023



No. 18(6)2011-DUAC

December 8, 2011

✓ Shri P.T. Jameshkutty
Under Secretary,
Ministry of Urban Development,
Nirman Bhawan,
New Delhi.

विषय : Residential activity in planned industrial areas.

संदर्भ : Ministry's letter no. N-11013/6/2011-DDIB dated 30.05.2011.

महोदय,

The above matter was considered by the Commission at its meetings held on November 2, 2011. The observations of the Commission are reproduced below for information :

"The matter has been considered in view of letter received from the Secretary, PHD Chamber of Commerce and Industry addressed to the Urban Development Ministry by the Commission at its meeting held on 2nd November, 2011 and opined as follows:-

1. Group Housing activities may be permitted as part of redevelopment/redensification strategy in large industrial plot only. (Minimum 5 acre)
2. 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. Hence, allowing residential activity in industrial areas will augment housing stock.
3. Group Housing in these areas will also provide for much required EWS/LIG housing. This will help in reducing unauthorized colonies as well as jhuggi clusters.
4. Also, 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.
5. Master Plan provisions already exists in respect of old age homes, night shelters, Hostels etc. in industrial use zones. Besides these, other community facilities may also be provided to incentivize Group Housing development in Industrial Plots.
6. Group Housing in Industrial Areas will also reduce carbon footprints as it will encourage walk-to-work culture.
7. Staff housing is always a part of large industrial estates and residential housing has been an integral part of earlier industrial areas.
8. Some residential areas have been converted to industrial area unauthorized in Delhi. Existing residential area has been further shrunk by mixed land-use on notified roads.
9. In many states and cities like Mumbai, Pune, where the industries have been relocated, residential and mixed land use has been permitted already.
10. Housing activities will commensurate and sustain commercial activities as already permitted in such use zones.

रविन्द्र कुमार



196

: 2 :

दिल्ली नगर कला आयोग
DELHI URBAN ART COMMISSION
भारत पर्यावास केन्द्र, कोर 6 ए
India Habitat Centre, Core 6A
लोधी रोड, नई दिल्ली - 110003
Lodi Road, New Delhi - 110003

11. In view of above, Commission is of the considered opinion that housing activities may be permitted in existing industrial plots having areas commensurate to the area of plot of Group Housing and industrial use premises as per MP-2021. (Minimum 5 acre)"

CC.

✓ SECRETARY,
INFRASTRUCTURE, ENERGY HOUSING &
URBAN DEVELOPMENT.
PHD CHAMBER OF COMMERCE.
SIRIFORT ROAD NEW DELHI

भवदीय

(Handwritten signature)
(नवनीत कुमार)
सचिव

(Handwritten signature)
(नवनीत कुमार)
सचिव

रविन्द्र कुमार

195

Plan 15-464
23rd May 2011

Dear Mr Goelji,

NEED TO AUGMENT HOUSING STOCK
RESIDENTIAL ACTIVITY IN PLANNED INDUSTRIAL AREAS

PHD Chamber is extremely grateful to the Union Ministry of Urban Development and the D.D.A for the Notification to allow Incentive F.A.R. for development of commercial facilities in Existing Planned Industrial Areas. This will ensure legal and remunerative use of industrial plots where industrial activities were stopped and commercial activities were being increasingly undertaken, very often without sanction. It will also ensure higher revenues to the Governmental agencies.

It is in the same spirit that we are now approaching the Union government and various agencies in Delhi to set an example by maximizing utilization of land resources for the benefit of providing shelter to citizens and promoting housing close to place of work so that there is minimum need to travel long distances for employment.

One of the most important aspects of planned development pertains to the provisions of adequate well planned shelter and housing for different categories of inhabitants of the city. The city of Delhi despite its various policies for the housing sector has failed to keep pace with the demand for housing in all sectors. Recognising the need for augmenting the housing stock in the city, the MPD-2021 has proposed to adopt a multi-prolonged strategy by involving the private sector to a significant extent, public agencies and co-operative societies etc. It has focused on the redevelopment and densification of the existing urban areas besides opening up new areas for development. Housing strategy has also integrated the concept of inclusive development by making it mandatory for all housing construction companies to provide for 15% of the permissible FAR or 35% of the dwelling units on the plot, whichever is higher, for the EWS in all big housing schemes.

PROGRESS • HARMONY • DEVELOPMENT

IN COMMUNITY'S LIFE & PART OF IT

SERVING : CHANDIGARH • CHHATTISGARH • DELHI • HARYANA • HP • J&K • MP • PUNJAB • RAJASTHAN • UTTARAKHAND • UP
Tel. : +91-11-2686 3801-04, 49545454, 49545400 • Fax : +91-11-2685 5450 • E-mail : phdcci@phdcci.in • Website : www.phdcci.in

194

Areas Permitting housing in planned industrial areas, otherwise called MIXED USE, is another aspect that deserves serious consideration because it is in practice in almost all major cities of the world. To permit housing, besides the already permitted commercial and retail usage within the existing MPD norms and after due payment of conversion charges, in planned industrial areas will only go to making them self-sufficient and provide for all facilities required by citizens in a compact geographical area.

This redevelopment strategy with higher FAR / density envisages optimum use of land resources which is the need of the hour.

It is in this context that the following suggestions have been made:

- Residential use of any land in the city should be given priority. The significant land bank available for achieving the objective of increasing housing stock are the existing planned industrial areas, where industries were closed down for various reasons in the last few decades. Opening of the industrial areas and other areas for mixed use including group housing, besides the already permissible industrial / commercial / retail usage would help create substantial stock for all persons employed in these areas, besides providing EWS housing in the same vicinity (by virtue of the mandate of MPD-2021 for 15% of FAR or 35% of dwelling units for EWS purposes). In order to attract owners / developers to utilize their land for residential use compared to commercial use which is a permissible activity on their lands and since the per square foot sale value of a residential development is less than that of a commercial development, incentives like additional FAR can be put in place.
- Mixed use development will also augment efforts being made to increase group housing in Delhi by enabling any plot in industrial areas amenable to Group Housing construction. This should be specially provided for by amalgamation of plots and use of larger plots in planned industrial areas, wherever available for immediate conversion to group housing, along with incentivised FAR on payment of conversion charges. These conversion charges need to be kept at levels which will provide an incentive for promoting group housing. The benefit of increased FAR needs to be considered by the Government in order to make the scheme practical.

Therefore the immediate action that can be taken by the Government is

1. Planned Industrial Areas be opened for Group Housing development, besides the already permitted industrial / commercial / retail in flexible portions as determined by the owners / developers
2. Incentive FAR be extended to 400 plus provision for 15% FAR for EWS.
3. Conversion Charges be kept minimum to promote this incentive and intensive housing development.

With kind regards,

Yours sincerely

193


Mr. Kamal Nath

Mr. Kamal Nath
Hon'ble Union Minister of Urban Development
Ministry of Urban Development
Government of India
Nirman Bhawan
New Delhi 110 011

Mr. Tejendra Khanna
Hon'ble Lieutenant Governor
Lt. Governor's Secretariat
Raj Niwas
Delhi 110 054

Mr. Navin Kumar, IAS
Secretary
Ministry of Urban Development
Government of India
Nirman Bhawan
Maulana Azad Road
New Delhi 110 011

Mr. G S Patnaik
Vice Chairman
Delhi Development Authority
B Block, 1st Floor
Vikas Sadan
New Delhi 110 023

CC to : Mr. Arun Goel, IAS
Joint Secretary (DL)
Ministry of Urban Development
Government of India
Room No. 144, C Wing
Maulana Azad Road
Nirman Bhawan
New Delhi 110 011



To,

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

Receipt & Despatch Cel.
Delhi Development Authority
Vikas Minar, I. P. Estate
New Delhi.

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.

number 191

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 "Flatland 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.

(190)

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.

189
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

188

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:

187
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

186

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."

185

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.

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 (above 30-upto 40sq.m.)	- 500 DUs/ Ha
Category II (above 40-upto 80sq.m.)	- 250 DUs/ Ha
Category III (above 80sqm)	- 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%

783

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 existing 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.

(182)

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.

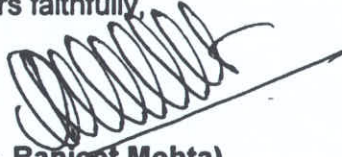
In order to facilitate the existing group housing schemes to get the benefits of enhanced FAR for increasing the housing stock supply, in already sanctioned schemes under MPD 2001, the new/enhanced stipulations should be applicable to the extent of enhanced FAR as per MPD 2021 only.

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