

November 17, 2011

Dr. Sanjeeb Kumar Mishra
Director – Delhi Division
Ministry of Urban Development
Government of India
New Delhi

Dear Dr. Mishra,

I hereby enclose suggestions relating to specific aspects in MPD 2021 for your kind consideration. These suggestions have been prepared on the basis of inputs received from industry. I hope our recommendations will add value to the midterm review process of the master plan of Delhi.

Best regards,

Yours sincerely,

Rajiv

Rajiv Kumar

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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 a differential development control norm 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.

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 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.”