



PHD CHAMBER OF COMMERCE AND INDUSTRY

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1-36
4229
07/11/2012

Plan-15-
6th November 2012

Commissioner-cum-Secretary
Delhi Development Authority
'B'Block, Vikas Sadan
New Delhi 110 023

Sub: MPD 2021: Objection / Suggestion in response to the public notice issued by
DDA, dated October 1, 2012 in r/o the proposed modifications – Allowing
Residential Use in Industrial Plots

This is in response to the DDA Public Notice dated October 01, 2012, inviting Objections / Suggestions in respect of the proposed modifications in Master Plan for Delhi 2021 regarding allowing Residential Use in Industrial Plots. Our members have sent us certain suggestions for the proposed amendments in the Master Plan. The Objections / Suggestions, along with proposals in above referred Public Notice dated 01 October 2012 with rationale are as under:

1. OBJECTION / SUGGESTION:

1.1 Amendments proposed by DDA (Public Notice dtd. Oct 1, 2012):

"CHAPTER 7.0 -INDUSTRY: Inclusion of **"2. Residential -20%"** in the Table 7.2 and addition of following note below the Table 7.2:

Note: In case of residential use premises regulations for Group Housing shall apply. The land shall be reserved for facilities as per residential facilities. Following break up for Industrial housing:

- **Industrial Worker:** 80% of DUs housing (category I of MPD -2021)
- **Entrepreneurs / Supervisor:** 20% of DUs (category II and III of MPD-2021)"

IB(DDA)

AJND - O/T
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1.2 Objections by PHDCCI Members for the above mentioned amendments:

Since MPD 2021 permits only non-polluting, non-hazardous industrial activities, which are not labour intensive, the number of Industrial workers living in the Industrial areas would be very limited. Hence housing for industrial workers only will not be a viable proposition.

In any case, when Group Housing is allowed on these plots as per MPD 2021 regulations, 15% of F.A.R would be devoted for construction of dwelling units for Community Service Personnel and lower category, which would cater to this segment of the society.

1.3 Suggestion / Modification proposed by PHDCCI :

The proposal in CHAPTER 7.0: INDUSTRY, in the above referred Public Notice of DDA dated Oct 1st 2012, note below table 7.2, makes for an ambiguous reading. It should be amended as:

- The individual industrial plots which meet the standards and norms of Group Housing under MPD 2021 and are located on 24 mt. ROW, should be given an option to develop Group Housing with applicable FAR (on the basis of Group Housing FAR and the Master Plan norms) on the entire plot with upto maximum 20% of area to be used for commercial use. The incentive of 1.5 times FAR which is permitted under notification S.E. no. 683(E) dated 1st April 2011 should also be extended under this scheme.”
- “The Owners / Beneficiaries of plots approved for Group Housing schemes shall pay the applicable conversion charges, additional FAR charges and shall obtain all necessary statutory clearances from the concerned agencies and approval of the layout plan / building plans by the concerned local body. No amalgamation should be allowed under this scheme.
- There would be no separate category of Industrial Housing.

2. OBJECTION / SUGGESTION:

2.1 Amendments proposed by DDA (Public Notice Dtd. Oct 1, 2012): In the same note as referred to above, there is a provision, "*The land shall be reserved for facilities as per residential facilities*" in the proposed modification in the referred Public Notice.

2.2 Objections by PHDCCI members for the above amendment:

The present proposal penalizes the plot owner for providing community facilities by depriving them of land as well as F.A.R for Group Housing. This is a restrictive provision.

2.3 Suggestion / Modification proposed by PHDCCI for the above amendment:

It is proposed that this provision shall be replaced by the guideline given in clause 3.3.2 (ix) of MPD 2021, which clearly lays down that for provision of community facilities, "**the concept of Accommodation Reservation i.e. allowing construction of community facilities without counting in F.A.R.**" should be followed. This would be an enabling provision.

3. OBJECTION / SUGGESTION:

3.1 Amendments proposed by DDA (Public Notice dtd. Oct 1, 2012):

CHAPTER 17 - DEVELOPMENT CODE: Clause 8: Sub Clause 8(2) Permission of Use Premises in Use Zones.

S.No	Use premises	Use Zones				
		RD	C1	C2	M	PSP
M. INDUSTRY						
1.	Industrial Plot, Flatted Group Industry	P	N P	N P	P	N P

3.2 Objections by PHDCCI members for the above mentioned amendment/s:

The proposed amendment shows that under "M – Manufacturing, the use premises (Industrial Plot, Flatted Group Industry)" is permissible in Use Zone 'RD – Residential' which is incorrect since this contradicts the intent of permitting 'Residential Group Housing' in Industrial plots.

3.3 Suggestion / Modification proposed by PHDCI for above:

The modification should be that the Use Premises 'RD - Residential Group Housing' should be permissible under the Use Zone 'M- Manufacturing' in the Table as under:

S.No.	Use premises	Use Zones				
		RD	C1	C2	M	PSP
RD RESIDENTIAL						
1.	Group Housing	P	P	NP	P	P

4. Rationale in support of the above mentioned suggestions / modifications by PHDCCI:

- 4.1 The previous policy of industries for NCT of Delhi focussed on encouraging manufacturing sector in Delhi and creating employment with minimum strain on Delhi's scarce resources which resulted in increase in secondary sector income from 25% in 1982 to 80% in 1999-2000. However, post 2000 the reversal of trend was witnessed, and the share of secondary sector diminishing to 20% and share of Tertiary Sector taking over by 80%. This trend has mirrored the transition of the country to a Service Sector dominated economy with the leaps taken in technology sector. Globalisation of the economies, preference for outsourcing to low cost destinations and India's pool of educated and English speaking workforce led to emergence of the country as a major IT, ITeS and outsourcing destination.

- 4.2 Industrial Policy for Delhi 2006 prescribed for development of industrial areas with the intentions to encourage the concept of 'walk of work'. This required that the housing for the people working in the Industrial Areas should have been provided in these areas. However, the Master Plan for Delhi did not address this issue and does not provide for development of any residential housing in industrial areas, when most of the polluting industries have been shifted out of Delhi and these industrial areas (Planned / Unplanned industrial clusters) have been identified for conversion to commercial use and redevelopment based on the notified policies with enhanced incentivised FAR.
- 4.3 In present scenario Trade, Commerce and Industry are interlinked sectors and this relationship has to be effectively translated in physical development in Delhi with appropriate share dedicated to residential development for the modern workforce. It is pertinent to mention here that the past two Master Plans for Delhi covering a period of 40 years had emphasized and continued with the policy of segregated land uses (residential, commercial, industrial, public and semi public etc.) while most of the western and south eastern countries have adopted the concept of flexible and mixed land uses for major cities including capital cities, responding to market requirements. Even Mumbai has, to an extent duly recognised the concept and is being developed on similar concept. However, Delhi happens to be an exception in view of Policy Makers and Planners, which due to non clarity on the subject matter has resulted in unauthorised colonies and industrial development. Although, Master Plan for Delhi 2021 has stipulated the policies for regularization of the unauthorised colonies and industrial clusters including planned industrial areas, it is felt that much more has to be done to address the issues to make Delhi a world class city by adopting the latest concepts based on international and market trends. The city has an effective mass public transportation in the form of Delhi Metro, but much needs to be done for restructuring of the land uses and redevelopment along metro corridors.
- 4.4 The MPD 2021 policy interventions allow conversion of industrial plots for commercial use, which are going to accommodate the IT and ITeS in these areas through the process of redevelopment. These industrial areas have duly been slated for redevelopment accordingly in future and hardly there will be any kind of manufacturing activities in the areas. Hence, the concept of reservation of land for Industrial Workers (Category I of

MPD-2021) and Supervisors (Category II and III of MPD 2021) in the proposed residential development is not justified in such areas. Therefore, residential development in the form of group housing based on market demand / requirements, as per the policy stipulations of the Master Plan should be duly considered, which will create the requisite housing stock for the requisite categories with reservations in these areas, with necessary clearances and approvals from the concerned environmental agencies. It is apprehended that this kind of strict category wise reservations will not help in achieving the desired results and the housing stock for the needy. Moreover, by allowing group housing, the stipulated housing stock for the low income category (15% of the FAR) will be generated for providing Community Service Personnel housing. Even Delhi Urban Arts Commission has recommended that Group Housing activities may be permitted as part of redevelopment / re-densification strategy in large industrial plots only, without any kind of category wise reservation.

4.5 Once the Group Housing is allowed on these plots with MPD 2021 norms, 15% of FAR would be dedicated for construction of dwelling units for Community Service Personnel / EWS and lower category, over and above the permissible FAR, which would cater to this segment of the society. Hence there would be no deficiency of housing for industrial workers. It is therefore suggested that residential housing development in industrial areas should be independent of the category wise reservations.

4.5.1 In MPD 2021, Hostels, Night shelter, Old age homes are allowed in the industrial plots. In revision of MPD 2021, the provision for Hospitals has been proposed (in the DDA Public Notice dated October 1, 2012). These Use Premises are allowed to meet temporary/ transit accommodation needs of the community at large. Hence, allowing residential Group Housing in industrial plots would just be a natural progression of next level of Use Premises, in the same use zone "RD-Residential".

It is requested that above suggestions/ modifications should be incorporated in the review of MPD 2021 so that effective implementation of the proposed suggestions/ modifications is ensured for the benefit of the City in addressing the housing shortage.

Yours sincerely,



(Dr. Ranjeet Mehta)

CC to : **Mr. Kamal Nath**

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