

09 April, 2020

D. Sarkar
Commissioner-cum-Secretary
Delhi Development Authority, B Block,
Vikas Sadan. New Delhi-110023
[Email: pccumsectry@dda.org.in](mailto:pccumsectry@dda.org.in)

With Copies to: Members of Delhi Development Authority

Re: Our objections to the proposed modification in MPD 2021 with respect to Transit Oriented Development

Dear Sir,

This is with reference to the public notice issued by DDA vide File No F.20 (7) 2015/MP dated 28 Feb 2020 regarding the proposed modifications to the Master Plan – 2021.

We would like to place on record our utmost disappointment about the manner in which DDA chooses to bring about sweeping changes to the landscape and life in the city of Delhi by engaging in extremely bureaucratic and obtuse policy drafting.

In March last year, we were put through an exercise to comment on a draft TOD policy and draft TOD regulations. Both these documents were released separately by the DDA for public comments a day apart from each other and this caused widespread confusion.

After that, the DDA called for a hurried hearing on this matter before the Board on July 12, 2019. Many who made submissions to that process were unable to participate in the Board hearing that was held at a short notice of less than a week. Yet we had all hoped that our objections would be responded to, since we had taken the trouble to go through both the draft policy and the draft regulations and send a detailed submission. It finally gazetted the proposed TOD policy on December 24, 2019. No justifications were given for why this policy was finalised despite the many concerns raised by those who wrote to you.

Has DDA become unaccountable to the people of this city, the very people it is meant to serve?

Now, after a gap of just three months, Delhi's public is expected to respond to another set of changes proposed to the TOD norms yet again. If regulatory norms on such an important subject are to be tweaked every few months, how are we to expect any well planned ideas on urban planning to be formulated and implemented in this city? Unstable and hastily drawn up regulations cause disruptions in urban planning processes and result in chaotic, contradictory and extremely self-serving outcomes. These changes invariably work only in the interest of the biggest land holder, the government itself and other private individuals owning large land parcels.

Why are these massive policy disruptions introduced when MPD 2041 is round the corner and participatory processes for it have already begun? Infact, the TOD policy issued on 24 December 2019 makes the MPD 2021 redundant by stating that the Development Control Norms would prevail in case of any conflict of any other policy/provisions within the MPD. This is gross violation of the MPD 2021, which is a part of the delegated legislation powers of DDA.

We would like to emphasise that the latest changes proposed in the 28.2.2020 notification are not in accordance with the principles of urban planning needed for a country like India or a city like Delhi. These continue to ignore, at great peril, the bleak and desperate future that we all face due to the multiple environmental crises that are looming over us: climate change, ecological degradation, total extraction of ground water and air pollution. If anything at all, the blind acceptance of “densification” as the seemingly sole basis of these proposals should be given up in the context of the COVID pandemic.

We therefore not only object to these changes proposed to the DDA’s TOD policy but we also urge that this policy not be taken forward at all, in public interest. Instead we recommend the following to be done by DDA. We are sure that these steps will be in conformity with the broad principles and reasons for the existence of DDA itself and will also comply with the legislations that empower DDA to function, first and foremost, in public interest.

1. Review and reassess these incremental changes proposed to the MPD 2021 in light of the gross inadequacies in the provision of public services like open public spaces, health, housing, water, sanitation, clean air and livelihoods.
2. Present proposals for city wide urban planning as a whole rather than piece-meal plot developments. These proposals are best presented as 3-D models and other visual means rather than as dense legal text.
3. Conduct city level public hearings to genuinely encourage and benefit from public participation. The DDA’s “one sided” board hearings are case studies in how not to do public hearings. The present practices of silencing public voices by conducting these Board hearings that have no effect on the DDA’s policies except to legitimize them, should be stopped.

As you are aware, the lockdown due to the COVID 19 pandemic has meant that we are all in our homes. We have no access to offices and are not allowed to conduct meetings with the communities and experts that are crucial to this exercise. This is the most inappropriate time to conduct a public process. We therefore urge you to withdraw this notice on the proposed changes to the TOD due to the strict constraints imposed by the nation-wide lockdown.

At the very least, withdrawing the notice will give the DDA an opportunity to consider the steps mentioned above with more attention than what is possible at the hurried Board Hearings and also provide time find ways to implement these steps.

We sincerely request you to please take into account this time, which has become available at great social and economic cost to our country, to rethink the prevalent aspects of urban planning towards a more equitable, safe and sustainable place for all.

Thanking you,



Manju Menon and Kanchi Kohli

Copy to: Members of Delhi Development Authority

- Shri Anil Baijal, Lt. Governor, Chairman, DDA (seclg@nic.in)
- Shri Tarun Kapoor, Vice Chairman, DDA (vcdda@dda.org.in)
- Shri K. Vinayak Rao, Finance Member, DDA (fmdda@dda.org.in)
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- Shri K. Sanjay Murthy Addl. Secretary, M/o Housing & Urban Affairs (sanjay.murthy@gov.in)
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