

## ***Rajdhani Unnayan Kartripakkha (RAJUK): Governance Challenges and Way forward***



**Fatema Afroz  
Farhana Rahman**

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### ***Research Adviser***

**Dr. Iftekharuzzaman**, *Executive Director, Transparency International Bangladesh (TIB)*

**Professor Dr. Sumaiya Khair**, *Adviser - Executive Management, TIB*

**Mohammad Rafiqul Hassan**, *Director - Research and Policy, TIB*

### ***Research Supervision***

**Abu Said Md. Juel Miah**, *Senior Programme Manager - Research and Policy, TIB*

### ***Research Team***

**Fatema Afroz**, *Deputy Programme Manager - Research & Policy, TIB*

**Farhana Rahman**, *Programme Manager - Research & Policy, TIB*

### ***Research Assistant***

**Razu Ahmed**

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### ***Contact***

**Transparency International Bangladesh (TIB)**

MIDAS Centre (Level 4 & 5)

House- 05, Road- 16 (New) 27 (Old)

Dhanmondi, Dhaka-1209, Bangladesh

Tel: +880 2 9124788-89, 9124792

Fax: +880 2 9124915

E-mail: [info@ti-bangladesh.org](mailto:info@ti-bangladesh.org)

Website: [www.ti-bangladesh.org](http://www.ti-bangladesh.org)

## Preface

Transparency International Bangladesh (TIB) works with a vision of a Bangladesh where government, politics, businesses, civil society and the daily lives of the people will be free from corruption, and all government, private and non-government organizations will run their operations with transparency, accountability, integrity and public participation. TIB aims at catalyzing a conducive environment for promotion of justice and human security. TIB's research dissemination, campaign and advocacy initiatives are designed to strengthen institutions, laws and practices for efficient, transparent and accountable system of governance.

The study on *“Rajdhani Unnayan Kartripakkha (RAJUK – Capital Development Authority): Governance Challenges and Way forward”* is aimed to analyze governance deficits, corruption and irregularities in RAJUK, to identify legal, institutional and other challenges and to make recommendations to enhance capabilities of this vital institution to deliver its mandate more transparently and accountably.

This study has found that RAJUK, being responsible for development, planning, control and monitoring of the development of the city, is being plagued with a number of challenges. It suffers from some legal, institutional, political and integrity challenges like various types of irregularities, corruption and bribery with their implications for its clients – the residents of Dhaka and various other private and public stakeholders including the government. The focus of RAJUK's role has been transferred from a primarily regulatory authority to a business entity, leading to a conflict of interest manifested by promotion of their business interests at the cost of public interests. On the other hand, an unholy nexus prevails involving a section of RAJUK's officials with private developer companies and politically influential persons undermining public interest, especially the purpose for which RAJUK was created.

We would like to thank the key informants who provided valuable information and opinion without which this study would not have been possible. We also express our gratitude to the relevant officials of RAJUK for providing us the data and information required for the study. We are particularly grateful to many officials and experts within and outside the government who gave their valuable time to contribute as key informants.

I congratulate Fatema Afroz, Deputy Programme Manager and Farhana Rahman, Programme Manager of Research and Policy Division for conducting the study. I also thank Abu Said Md. Juel Miah, Senior Programme Manager, Research and Policy, for supervising the research and other colleagues for their support including feedback in various stages of the study. I am also especially thankful to Professor Sumaiya Khair, Advisor Executive Management, and Mohammad Rafiqul Hassan, Director – Research and Policy of TIB for supervising the overall research process and providing necessary guidance.

We hope that the relevant authorities and stakeholders would find the report useful for their work towards improving the governance standard of RAJUK. We will cordially welcome any comments, critique and suggestions the readers may have.

**Iftexharuzzaman**

Executive Director

## Acronyms

ACC - Anti-Corruption Commission  
AC Land Office - Assistant Commissioner Land Office  
ACR - Annual Confidential Report  
BC - Building Construction  
OCAG – Office of the Comptroller and Auditor General  
CBA - Collective Bargaining Agent  
DAP - Detailed Area Plan  
DC - Deputy Commissioner  
DCR - Duplicate Carbon Receipt  
DIT - Dhaka Improvement Trust  
DMDP - Dhaka Metropolitan Development Plan  
DPC - Departmental Promotion Committee  
EIA - Environmental Impact Assessment  
GIS - Geographic Information System  
ILO - International Labour Organisation  
PPR - Public Procurement Rules  
RAJUK - Rajdhani Unnayan Kartripakkha  
RMG - Ready Made Garments  
SDG - Sustainable Development Goals  
TI Act - Town Improvement Act  
TIB - Transparency International Bangladesh  
UN - United Nations  
UNDP - United Nations Development Programme  
VDP - Village Defense Party

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# Chapter One

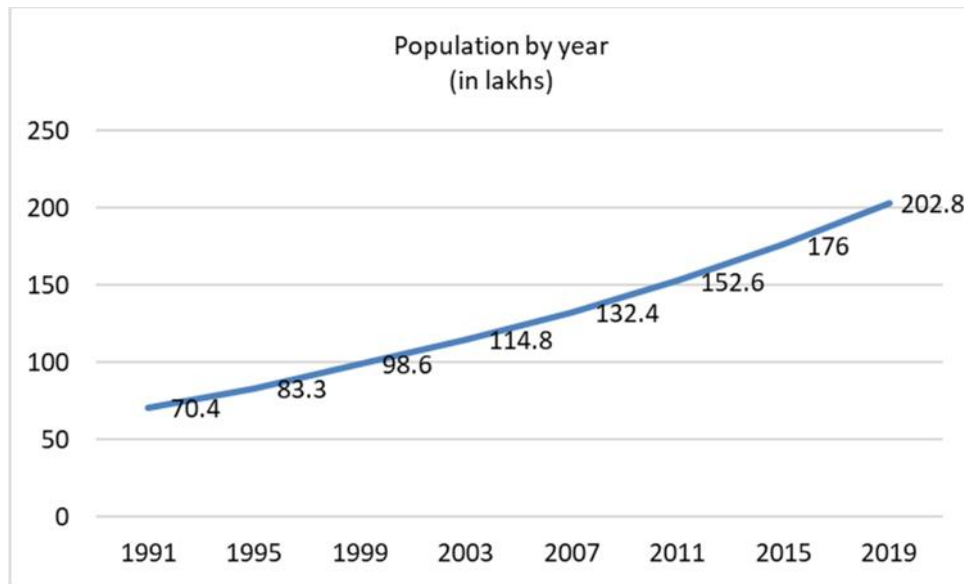
## Introduction

### 1.1 Background

*Rajdhani Unnayan Kartripakkha (RAJUK)* is the prime authority to build its area jurisdiction as a planned, livable and environment friendly city. It is an autonomous body. RAJUK is entitled with the responsibility of planning, developing and controlling development of the areas under its jurisdiction. One of the Sustainable Development Goals (SDGs) of the United Nations is that, sustainable development is not achievable ‘without significantly transforming the way we build and manage our urban spaces’ (Goal 11). The global body emphasizes on ‘making cities and human settlements inclusive, safe, resilient and sustainable. It is targeted to ensure access for all- to adequate, safe and affordable housing and basic services (Target 11.1), to enhance inclusive and sustainable urbanization (Target 11.3), to provide universal access to safe, inclusive and accessible, green and public spaces (Target 11.7), to adopt and implement integrated policies and plans (Target 11b) etc. (UN, 2015). Sustainable urban development has also been emphasized in the 7<sup>th</sup> five-year plan of Bangladesh government (GoB, 2015). The perspective plan of government has also taken the ‘sprawling urbanization’ into consideration (GoB, 2010, p. 68) and emphasizes to ‘make cities livable’. All these combine the role of the city development authority. This study is an initiative to assess the governance of this body as well as the services vis-à-vis its mission.

More than half of the world’s population live in urban areas and as it is foreseen that by 2050 the figure will rise to ‘two-thirds of all humanity’. It is more relevant for the developing countries where growth of the cities is being multiplied by with increasing urban migration from rural areas. Population of the Dhaka city was about 70 lakhs which has increased by three times and reached at about 2 crores (Macrotrends, 2019). Dhaka has remained the most densely populated city on earth for last three consecutive years with a number of 47,400 people living in per square kilometer while Mogadisu is the second densest with 28,600 inhabitants ((Amin, 2018). The fast-growing population of Dhaka (Figure 1) is putting tremendous pressure on livability of the city, as evidenced by its excessive demand for housing, high rates of poverty, increasing congestion, inadequate infrastructure etc.

**Figure 1: Increase of population of Dhaka city by year**

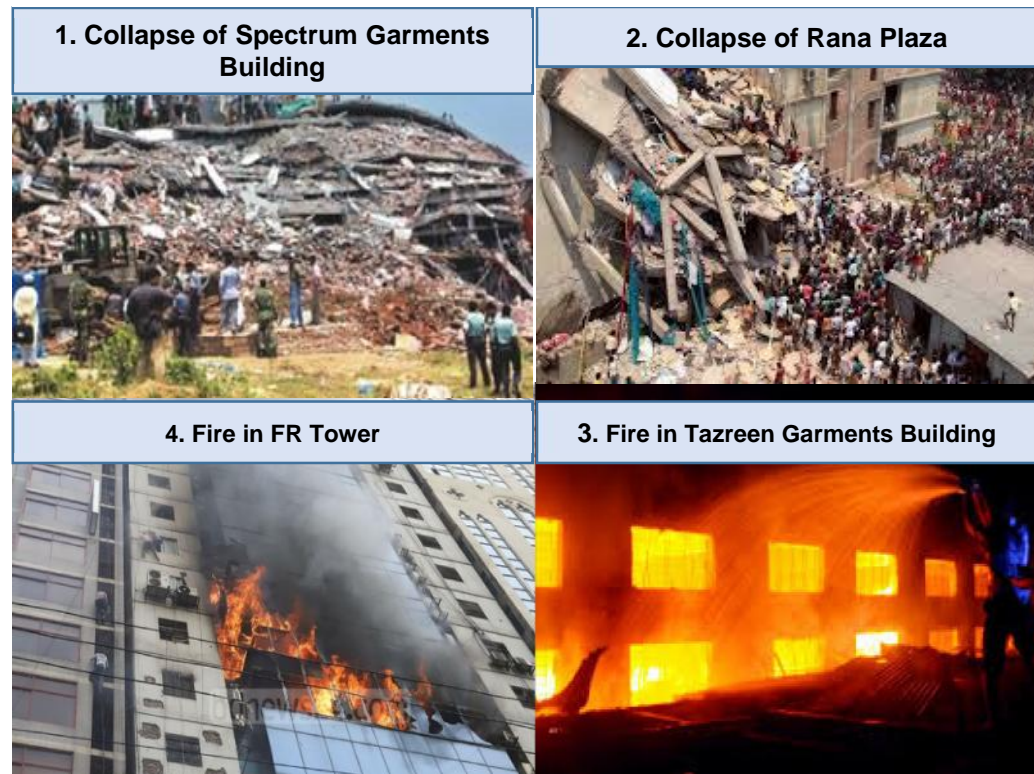


Source of Data: United Nations - World Population Prospects, 2019 (Macrotrends, 2019 ).

Dhaka has been ranked the third least livable city while civil war-torn Damascus being at the least point (Economic Intelligence Unit, 2019). In this assessment housing of a city is considered as a central component of livability including affordability, cost burden, subsidized options, accessibility etc. All these are putting pressure on the fringe areas of the city which are being amplified by land speculations. On the other hand, the quality of housing specially the building itself is also an issue of great concern.

Among other problems associated with the city, violation of building codes has become a major concern in recent years. Especially some catastrophic occurrences related to building codes, such as collapse of Rana Plaza in 2013, fire in Tazreen Fashion factory in 2012, collapse of Spectrum building in 2005, fire in FR Tower in March 2019 etc. generated massive public concern on the issue and also let the concerned bodies to make some new steps (Picture 1). When extreme examples come in front of the people, much discussion takes place in public discourse; but after that, things are forgotten until the next occurrence repeats the catastrophes.

**Picture 1: Catastrophic occurrences for violating building codes**



Source: 1. The Clean Cloth 2. The Daily Star 3. Bloomberg Businessweek 4. Bdnews24.com

It is often claimed that the situation has improved a lot (ILO, 2016) since 2013. Specially after the collapse of Rana Plaza, that had been considered as the ‘worst garment industry accident’, there was much concern at the national and international levels. Those concerns resulted in several initiatives for ensuring safety of buildings (Accord, 2019). However, those were limited to the buildings being used for readymade garment (RMG) industries. The RMG industries got a momentum because of the move at the national and international levels. The general trend is that when extreme examples come in front of the people, much discussion takes place in public discourse; but after that, things are forgotten until the next occurrence happens. So, the question is why the catastrophes happen one after another. Questions arise over the state of governance of the relevant institutions. There are allegations and questions raised over the integrity of some of the officials of RAJUK. After the FR Tower fire, it was alleged that “RAJUK cannot avoid its responsibility” (Independent, 2019). In fact, RAJUK is both a permission giving authority and monitoring authority of building construction and maintenance.

Now it is time to see to what extent the violation is going on, what are the governance challenges behind, whether any institutional limitation is working behind, whether the legal basis being

created are working well, and what can work to restore good governance in RAJUK. Therefore, the study has focused on the governance issues of RAJUK, the challenges including those of legal, institutional and political ones with special focus on its services.

## **1.2 RAJUK and its role**

*Rajdhani Unnayan Kartripakkha (RAJUK)* is the major body responsible for development, planning, controlling and monitoring the development of the city of Dhaka. It was established as a statutory government organization in 1956 as Dacca Improvement Trust (DIT) by Town Improvement Act, 1953. It was named as RAJUK in 1987 with increasing the scope of the authority with major part of Gazipur, Savar and Keranigonj under its jurisdiction which encompassed an area of 1528 square kilometers. [Annex 1]

RAJUK is an autonomous body. RAJUK is responsible for preparing the strategic plans and the master plans for ensuring ‘a planned, livable and environment friendly city’. It is aimed to achieve its goal with solving housing and transportation problems and creation of large scale water-based public space (RAJUK, 2018). For planning, development and development control, RAJUK is to do the following functions:

- Approval and development control of building construction and private residential land development projects
- Preparation of master plan, structure plan and detailed area plan (DAP)
- Planning for new urban area development
- Construction of roads, bridges, flyover and other infrastructures required to reduce traffic congestion
- Conservation of parks and lakes

However, with a mission of ‘planning, development and development control and to manage the growth of Dhaka city’, RAJUK is to achieve its strategic objective of ensuring ‘sustainable, safe and affordable housing provisions for low and middle income people’.

## **1.3 The buildings of Dhaka city and the role of RAJUK**

RAJUK is in short of has no updated data on the total number of buildings in Dhaka city. However, according to a survey carried out by RAJUK on 2 lakhs 4 thousand and 106 buildings during the period of January 2018 to July 2018, a total of 1 lakh 95 thousand and 376 buildings were built earlier and one lakh 31 thousand and 583 of the buildings which is 75% of the total building surveyed, had deviations. Among the eight thousand 730 buildings which were under construction, three thousand 342 buildings had deviations from the approved plans (RAJUK, 2019). Among the three thousand 273 high-rise buildings, RAJUK has information of 2 thousand

818 buildings. Among them, 70% buildings have no fire safety measures, 33% buildings do not have alternative stairs to evacuate during fire incidents. Among the rest 67% of the building that have alternative stairs, 34% are not usable according to RAJUK (Dhaka Tribune, 2019).

The contextual analysis as mentioned above endures questions over the role of RAJUK. On the other hand, there are questions whether the RAJUK is in a position to manage its wide range of responsibilities. However, the increasing scope of RAJUK after reorganization of RAJUK with larger jurisdiction of an area of 1528 sq. km along with Savar, Gazipur and Keranigonj, should also be taken into account while assessing RAJUK.

“RAJUK is not in a position to accomplish its tasks in an effective manner consistence with the demand of the situation. So it is now a pressing issue- to redefine the institutional role of RAJUK in city development.”

- Dhaka Structure Plan, 2016-35

#### 1.4 Objective of the research

The overall objective of the study is to identify the nature and extent of governance challenges of RAJUK including those of legal, institutional and political ones, and also to explore the reasons behind for recommending future strategies. To state them specifically the research objectives are as follows:

- To identify the nature and extent of governance deficits, corruption and irregularities in RAJUK
- To identify legal, institutional and other challenges
- To explore the root causes of governance deficits
- To recommend the strategies and effective measures to enhance governance

#### 1.5 Scope of the study

RAJUK is entrusted with a number of responsibilities. This study has focused mainly on two major services namely land use clearance and permission on plan for construction of building. Along with the above mentioned services this study has also included planning and development related role of RAJUK. The internal management of RAJUK including code of conduct, participation, decision making process, complaint mechanism, deputation, promotion, procurement procedure, disclosure of information, implementation challenges, monitoring and supervision, audit etc. have been evaluated.

#### 1.6 Rationale of the study

Sustainable development of Dhaka city is highly dependent on RAJUK and its effectiveness. TIB is working to promote institutions, laws and practices for combating corruption with prioritizing the service sectors. TIB has selected the research topic on RAJUK with the consideration that this institution serves a large number of people. There are few number of studies on RAJUK; but very

few of them are focused on the overall governance of RAJUK from an institutional point of view. This initiative has contributed to identify and measure the governance-deficits, corruption and irregularities, causes of governance deficits, and recommending strategies and initiatives that may work to enhance the governance in RAJUK.

### 1.7 Methodology

This is a qualitative research. It has followed qualitative methods of data collection. But in some cases quantitative information have also been collected and analyzed. Both primary and secondary sources have been explored for data collection (Table 1).

**Table 1: Methods and sources of data collection**

<b>Types of data sources</b>	<b>Sources of data collection</b>	<b>Methods of data collection</b>
Primary sources	Officials of RAJUK, service recipients, real estate developer, engineers, architects, town planners, experts, journalists, officials of fire service and civil defense, officials of anti-corruption commission, officials of the Ministry of Housing and Public Works.	Key informant interview, observation
Secondary sources	Relevant acts, rules and regulations, policies, circulars, annual reports, research reports, articles, websites etc.	Review literature and other documents

### 1.8 Data analysis

Data have been analyzed by using governance lens, which include relevant indicators such as capacity, transparency, accountability, participation and inclusiveness and integrity. For analysis, it has been presented in four dimensions (Table 2).

**Table 2: Analytical framework**

<b>Dimension</b>	<b>Indicator</b>
Institutional Capacity	Acts, rules, guidelines, infrastructural and logistic arrangements, financial arrangements, human resources, decision making and coordination
Transparency	Disclosure of information, Openness in formulation and implementation of project
Accountability	Code of conduct, monitoring of service providing activities, complaint mechanism and settlement procedure, audit, public hearing
Participation & inclusiveness	Decision making process, planning, development projects, inclusion of middle and lower income people, gender sensitiveness
Integrity	Unauthorized payment, irregularities, non-compliance to rules and other legal provisions

The study has examined relevant laws and policies as well as practices of RAJUK by applying these indicators. Both the service and the internal management issues have been covered in the study.

### **1.9 Timeframe of data**

The research started with developing a concept of the study in November 2018. Data collection of the study started in December 2018 and continued until December 2019.

### **1.10 Limitation of the study**

This study does not generalize the data that have been collected from different sources. Rather it has provided a snapshot of the governance challenges that prevail in RAJUK. Furthermore, due to unavailability of data some areas such as financial transparency etc. could not be assessed properly.

Due to unavailability of information or updated data about the approved building from RAJUK, the study team could not conduct random survey of the service recipients. However, the study

team has continued with interviewing service recipients as well as other stakeholders on the issue. Furthermore, there may be some gaps in data due to unavailability of data from the respective institutions.

### **1.11 Structure of the report**

The report is comprised of six chapters. The first chapter consists of the introductory discussion including the context and background, objective, scope, rationale, limitation, conceptual framework and methodology of the study. The second chapter is comprised of the institutional arrangement of RAJUK along with the organogram and other related issues. The third chapter is about the legal framework of RAJUK, which include the acts, rules and other directives from government. This chapter also includes the legal limitations and challenges. The fourth chapter starts with the main findings regarding governance challenges vis-à-vis the services of RAJUK. This chapter also considers institutional and other challenges of RAJUK. The fifth chapter considers an overall analysis of the research findings. The sixth chapter consists of a conclusion followed by a set of recommendations.



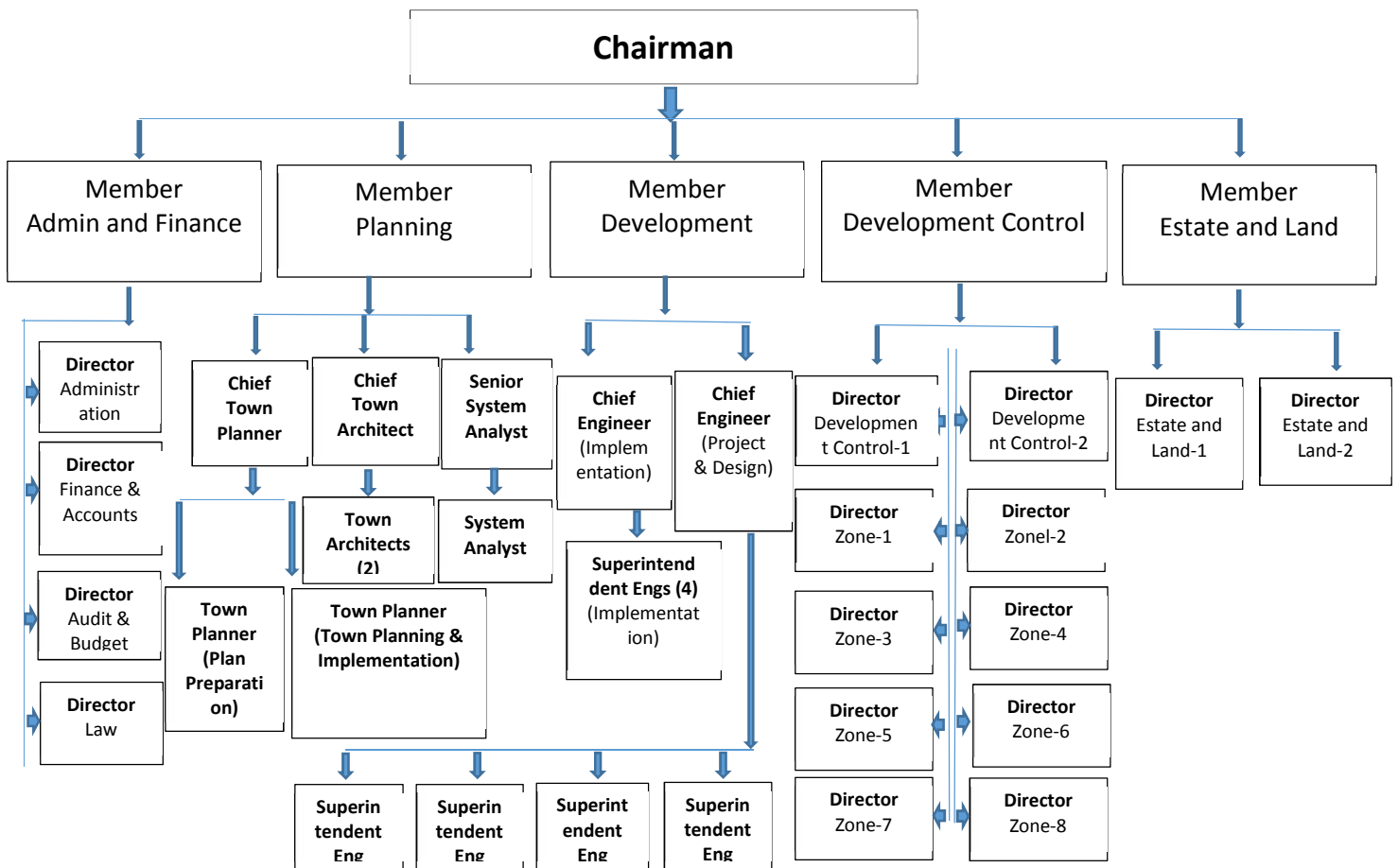
## Chapter Two

### Institutional Framework of RAJUK

#### 2.1 Organogram of RAJUK

Rajdhani Unnayan Karttripakkha (RAJUK) is governed by the Chairman and five other Members appointed by the Government. They are full time officials and the Chairman is the Chief Executive of the Authority. The Chairman presides over all the meetings of the Authority. At least one meeting is held in every month. Special meeting commences at the request of the Chairman to address urgently raised issues. In absence of the Chairman, a Member authorized by the chairman precedes the meeting. The agenda of meeting includes issues related to development policies, development projects and development control, land acquisitions, land disposals and organizational matters (Rajdhani Unnayan Karttripakkha, 2019a).

**Figure 2: Organogram of RAJUK**



Source: Annual Report 2017-18, RAJUK

Before the emergence of RAJUK, to govern Dhaka Improvement Trust (DIT), a Trustee Board was constituted with seven Members as per provisions of the Town Improvement Act 1953. Two other Members were included when the district of Narayanganj was incorporated within the jurisdiction of DIT. The Chairman and three other Trustees were appointed by a government notification. The members of the Trustee Board were chosen from different service agencies and different professions to involve and contribute in the development process of Dhaka. The Trustee Board was involved in policy making, planning and development control of Dhaka (Rajdhani Unnayan Kartripakkha, 2019a).

However, at present the overall responsibilities and functions of the Chairman and the Members are prescribed and assigned by the government (Rajdhani Unnayan Kartripakkha, 2019a). They are posted in deputation. There are Directors and Deputy Directors who are deputed from different departments of different ministries.

Although the total number of approved human resource (amended in 2013) is 1980 according to the organogram, a total of 1187 are appointed currently. Among them only 9.7% officials are females.

## **2.2 Institutional arrangements of RAJUK**

The main functions of RAJUK are planning, development and development control. To conduct these three functions, there are four wings namely Planning, Development, Development Control, and Estate and Land, which are headed by the Members of the executive board of RAJUK. To accomplish their objectives through the application of available resources especially financial and technological, there is a supportive wing named Admin and Finance (RAJUK, 2018).

Planning wing is mainly responsible for plan preparation and implementation. Moreover, they are engaged with approval process of land use permission and private projects which are activities of development control. Preparation, revising and updating of laws, rules and regulations concerned with urban development and management, regulating the private land developers and their development projects, land use zoning control, automation, architectural designing of RAJUK's development projects etc. are some main functions of this wing (RAJUK, 2018).

Development wing is one of the important sections of this organization. It looks after the implementation of development works or projects of RAJUK and some Government projects ((RAJUK, 2018). To conduct the development activities in RAJUK jurisdiction areas, RAJUK

executed and currently executes some development projects under the provision of the Town Improvement Act, 1953, funded by Government and RAJUK and RAJUK itself.

Estate and Land wing is responsible to look after RAJUK's completed projects on housing, commercial, industrial and flat construction etc. Estate wing of RAJUK is assigned for preparing allocation of residential, commercial, industrial plot and apartments/flats and completion of lease deed, mutations, transfer of leases and no objection certificates of land use of the completed projects, etc. (RAJUK, 2018).

Development Control wing is responsible for approval of building construction plans as per instruction mentioned in the Greater Dhaka Building (Construction, Development, Preservation and Demolition) Rules, 2008 and entrusted to regulate building construction activities, through monitoring, taking initiative for enactment of laws/rules and subsequent revision and amendment regarding building construction and development. Moreover, this wing is responsible for demolition or removal of unauthorized structures and deviated portion of structure by conducting mobile court and eviction activities, and registration of development companies as per the Real Estate Development and Management Act, 2010 and the Real Estate Development and Management Rules, 2011 (RAJUK, 2018).

### **2.3 Some Initiatives and Projects of RAJUK**

RAJUK has taken some initiatives for improving development and development control as well as good governance in RAJUK. Some of the recent initiatives (RAJUK, 2019) are given below:

- Introduction of online application for land use clearance, building construction and training
- Introduction of e-documentation and training given to three hundred twelve participants
- Introduction of strategy to simplify service process under Access to Information (a2i) project
- Introduction of Geographic Information System (GIS) mapping and use of advanced software
- Discussion meeting with engineers and architects regarding motivation of taking occupancy certificates and taking initiatives to construct the building according to plan on 1 December 2018
- Giving circular regarding land use clearance, permission on construction and permission of special project: RAJUK has omitted clearance from ten organizations for all

constructions, omitted clearance from one organization for residential building, and omitted no objection letter from one organization to reduce time for plan permission on 17th June, 2019

- Taking punishment initiatives to some corrupt officials; From July 2014 to 2018, a number of 26 persons were punished (RAJUK, 2015; RAJUK, 2016; RAJUK, 2017; RAJUK, 2018).
- Introduction of zone based service activities
- Eviction activities at several times

Apart from the initiatives, RAJUK has completed some projects after its establishment. Some of the major completed projects include Township Development/Housing Estate/Site & Services Projects, Industrial Estates, Commercial Projects, Markets & Shopping Centres, Road Construction Projects, Open Space/Park/Play Grounds, Fountains, Bridges & Culverts, Buildings/Apartments/Quarters, Flyover and Car Parking (Detail in Annex 2).

## 2.4 Legal Framework

RAJUK is administered under the following acts and rules (RAJUK, 2017):

### Acts:

- The Town Improvement Act, 1953 (Amended 1991): This act is the basis of the establishment of RAJUK. It gives RAJUK a special power to develop, expand and improve areas in Dhaka city and its vicinity.
- The Building Construction Act, 1952: This is the basic act for development control, which asks for prior permission before any development work.
- The Natural Water Body, Open Space, Park, Playground Protection Act, 2000: This law has the prior objective of conservation of natural water bodies, open space, park and playground for public use and public interest.
- The Real Estate Development and Management Act, 2010: This is an act to bring real estate development and management under specific regulations.

### Rules and Regulations:

- The Dhaka Improvement Trust (Allotment of Land) Rules, 1969 (Amended 1986)
- The Private Housing Land Development Rules, 2004 (Amended 2012, 2015)

- The Greater Dhaka Building (Construction, Development, Conservation and Demolition) Rules, 2008
- The Public Procurement Rules, 2008
- The Rajdhani Unnayan Kartripakkha (Employee) Service Rule, 2013
- The Bangladesh National Building Code, 2015
- The Detailed Area Plan (DAP) Gazette

Moreover, there are some rules or gazettes which are related with RAJUK' s activities, which are as follows:

- The Government Servants (Conduct) Rules, 1979
- The Fire Prevention and Extinction Act, 2003
- The Brick Manufacturing (Control) Act, 1989
- The Gazette on Preservation of Historical Buildings/Infrastructures/Important Locations, February 2009

For development control according to the Greater Dhaka Building (Construction, Development, Conservation and Demolition) Rules, 2008, there are three committees, i.e., (1) Building Construction (BC) Committee for plan approval of building, (2) Special committee for specialized<sup>1</sup> projects approval, and (3) Nagar Unnayan Committee for settlement of appeal of specialized projects and determining heights of special building beside historical, architectural place or considering importance of environment and culture, and for supervision of building in compliance with the Greater Dhaka Building Rules. Moreover, any committee can be formed for development control, development and improvement.

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<sup>1</sup> Specialised project includes the building that consists of more than 40 residential units, floor area of more than 7500 sq meter, building of prominent shopping centre with the floor area of more than 5000 sq meter, any project connected with national or regional road, hazardous or polluting industry including brick field, any construction or development within 250 meter of architectural or historical important building, any construction or development within 250 meter of natural beauty area, any construction or development within 50 meter of hill or visible as hills, any construction or development within 250 meter of the bank of river.

## Chapter Three

### Legal and Institutional Limitations and Irregularities

#### 3.1 Legal limitations

There are various types of legal limitations in the management of RAJUK activities. These include the limitations related to acts, rules and policies. There are some pragmatic challenges that RAJUK faces due to the limitations of laws and regulations. Limitations and challenges of policy, laws and rules are given below:

##### ***The Town Improvement Act, 1953 (Amended 1991)***

The eligibility criteria for the selection of chairman and members to appoint in RAJUK are not specified in the Act. The risk of this provision is that it might not facilitate to appoint technical persons such as engineers, planners and architects, who are most appropriate for RAJUK's activities.

##### ***The Building Construction Act, 1952***

The penalty for the deviation of the Act is very minimum (fifty thousand taka or seven years of imprisonment or both). It might create the tendency among the service recipients to violate the Act.

##### ***The Greater Dhaka Building (Construction, Development, Conservation and Demolition) Rules, 2008***

For construction plan approval, there is no section regarding submission of fire safety plan and structural plan. Only architectural plan is mandatory for plan approval. It creates problem in supervision. Moreover, there is a risk of law violation and accident of fire.

In the Rules, it is defined that multistoried building is more than ten storied building, which conflicts with the Bangladesh National Building Code, 2006 (20 meters), National Fire Protection Association (23 meters) and the Fire Prevention and Extinction Act, 2003 (more than six storied). According to the Fire Prevention and Extinction Act, 2003, multistoried building is seven storied and more, which is required for fire plan approval. On the contrary, RAJUK makes it mandatory for the service recipients to take no objection letter from the Fire Service Office for the buildings consisting of more than 10 stories or 33 metres height. As a result, seven to ten storied buildings

remain beyond the coverage of fire safety. Moreover, for taking occupancy certificate, fire safety plan is not required or mentioned to submit.

For the plan approval, only the information of the concerned plot is considered; however, the block context especially open space, height of the surrounding buildings etc. are not considered. For example, if all buildings are multistoried in a particular area, it creates high impact in the area such as traffic congestion, problems in providing utility services, etc.

In the Rules, standardization of road width considering with the local context is not taken into account. According to the Rules, road width has to be minimum 2.5 meter. However, in old Dhaka, there are many roads beyond 2.5 meter. As a result, if one person shows the actual width s/he will not get the land clearance. Hence, with the undue help of RAJUK officials, the service recipient shows the road width more than 2.5 meter or they illegally develop their building.

In paragraph 18 (3) of the Rules, it is mentioned that all responsibilities for the designs' (architectural drawing, structural design and building services) adequacy and suitability go to the concerned architect or engineer. However, the necessity of RAJUK's supervision and monitoring for maintaining compliance of the designs is not mentioned. As a result, RAJUK tends to avoid the responsibility of ensuring adequacy and suitability of the designs.

In paragraph 24 (6) of the Rules, the Town Development Committee may control the height of the buildings constructed beside the architectural or historical sites as well as the areas with natural beauty, hilly area, bank of river. However, the Rules has not clearly mentioned about the height limit of the adjacent buildings. It might create a risk of manipulation of this article by applying political power and unfair means.

In paragraph 56 of the Rules, the required minimum car parking space of a building is determined. For example, for a building constructed beside a 10' road, keeping a space for car parking is mandatory, without which building approval is not given. Moreover, all applicants do not need car parking space in a building. Every applicant gets the approval of building with car parking but during the implementation, all do not comply it as they do not require the space.

### ***The Private Housing Land Development Rules, 2004 (Amended 2012, 2015)***

The guidelines and standard of the Land Development Rules have created scope for housing opportunities of high-income group, but have not spelled out the provisions of housing for the lower or middle-class groups.

The Rules does not specify the period for starting the construction of building after receiving a plot. It is to mention that for the housing project undertaken by RAJUK, the construction of the

building is bound to be completed with the approval within four years after contractual allocations of the developed plots. As the Rules does not specify the timeframe for the private entrepreneurship, the plot recipients tend to leave the plot vacant without constructing a building with the calculation that the price of the land will rise and they will be get more price, if they sell. This tendency does not help resolve the housing crisis. Moreover, the price of land increases manifold over time and as a result, the price of the flat subsequently increases.

The Rules does not provide the direction about involving local people in the private housing project. Moreover, the Rules does not mention about how the project will be monitored after the project approval.

### ***The Dhaka Improvement Trust (Allotment of Land) Rules, 1969 (Amended 1986)***

The Rules does not provide any clear directive regarding the quota system for allocating plots for different groups of projects. As a result, the quota varies from project to project. Moreover, the Rules does not spell out the criteria for the persons having remarkable contribution to the nation, which is required for proving the eligibility to apply for plot under special quota. For that reason, there might be risk of abusing or controversial using of the rule.

Apart from this, there is no specific instruction on the share of the total number of plots or flats that should be allotted for the affected people of the project. As a result, there are risks of making difference in different projects in the allocation of plots according to the decisions of RAJUK. Moreover, it might create risks of irregularities in the allocation of plots or flats.

### ***Other legal limitations***

RAJUK does not have its own financial manual. Furthermore, the table of authority is not specified. For that reason, it takes time to make and execute financial decisions. Moreover, there is no policy for using office vehicles from the pool. Therefore, one has to depend on and wait for the decisions from executive board, which may take much time or may not help have the cars when required.

## **3.2 Institutional Limitations**

Institutional efficiency depends on proper management of human resources of an organization, financial efficiency, access to information, financial audit, inter institutional coordination and the availability of logistics. However, there are various types of institutional limitations of RAJUK, which have adverse effects on its efficiency.



## 3.2.1 Human Resource Management

### 3.2.1.1 Insufficient human resources

RAJUK has shortage of approved human resources. For example, the positions of chief town planner, chief architect, town planner are approved in the organogram, but are vacant at present. There are also vacancies against other approved positions, which are not fulfilled. Approximately 40% (Table 3) of approved positions remain vacant. Some of the main posts for development control such as authorized officer, assistant authorized officer, town planner, deputy town planner, assistant town planner and senior inspector are also vacant. Moreover, the approved posts are inadequate considering the actual needs.

**Table 3: Deficiency of Human Resources in RAJUK**

Class of posts	Approved Human resources	Appointed Human resources	Vacant posts (%)
1 <sup>st</sup> class	350	180	170 (48.6%)
2 <sup>nd</sup> class	517	295	222 (42.9%)
3 <sup>rd</sup> class	664	421	243 (36.6%)
4 <sup>th</sup> class	449	291	158 (35.2%)
<b>Total</b>	<b>1980</b>	<b>1187</b>	<b>793 (40.1%)</b>

Source: RAJUK, 2019

The size of staff is not proportionately maintained across different departments of RAJUK. The staff in the Accounts and Finance Section is only 2% of the total human resources in RAJUK, which is not sufficient for running the section efficiently. The staff of this section argued that this size should have been 10% of total staff (RAJUK, 2017). Moreover, the number of internal auditors is very poor. As a result, RAJUK officials cannot inspect effectively, perform internal audit or complete work in time and efficiently.

RAJUK has also insufficient technical and efficient employees. Many of the directors, all members and chairman of RAJUK are deputed from different ministries. Most of them come from the administration cadre and in most of the cases they do not have technical background relevant with RAJUK activities. Even, the current member of RAJUK who looks after planning section does not have technical background, though this position is vital for ensuring development control. Some employees recruited as technical persons i.e., computer operators have been found with non-technical background. Although they are supposed to be efficient in their work, they need to take support from other persons. Moreover, there is no engineer in RAJUK with the

specialization of structural engineering. Apart from this, some of the employees' job description is not clear. For example, zonal director does not know her/his real role as the job description is not clear.

### ***3.2.1.2 Irregularities related to recruitment, posting, transfer and promotion***

RAJUK heavily depends on the central government for human resources. Almost all the key posts in RAJUK especially at the director level are filled-up by civil servants. Coordination gap takes place between deputed employees and RAJUK's permanent employees as the deputed persons have lack of field experience of RAJUK activity and when they get the knowledge, they are transferred. Moreover, there are some employees in RAJUK working for more than three years in deputation. For them, the deputation in RAJUK is lucrative as they find scope to make money in unfair means. For that reason, to stay in deputation they pay bribe. Even, there is an allegation of bribing Taka 5 million to stop transfer from RAJUK. There are also discrepancies of giving promotion to eligible staff.

Political influence and nepotism are alleged to be found in the recruitment of RAJUK. Moreover, for posting, convenient transfers and promotions, political influence, bribery and some irregularities prevail in RAJUK. It is alleged that in some cases, the persons who are deputed in RAJUK should have strong lobby with relevant ministry. Moreover, for the recruitment from 9<sup>th</sup> to 20<sup>th</sup> grade in RAJUK, the line ministry takes a long time for the approval of the vacant post. In some cases of recruitment political influence, influence from powerful persons or leaders of Collective Bargaining Agent (CBA), and nepotism are used. There is also allegation of biasness towards the candidates referred by the RAJUK staff during viva voce. The viva board is also alleged of favoring the candidates having reference from political leaders or other influential persons.

Moreover, there are allegations of bribery for transfer and posting in convenient places. The size of bribe money depends on the position, importance of the post, department and location of posting. The bribe money ranges from Taka 0.2-0.25 million. Moreover, transfer is also influenced by political pressure and lobby. Sometimes, some persons are transferred in backward place or in a position not suitable for him/her, which is sometimes driven by mere political reasons.

According to the Rajdhani Unnayan Karttripakkha (Employee) Service Rules, 2013, promotion mainly depends on the Annual Confidential Report (ACR) and seniority, which is sometimes violated. Moreover, the Departmental Promotion Committee's (DPC's) meetings for deciding over promotions are not held regularly. The meeting did not take place for more than two years<sup>2</sup>.

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<sup>2</sup> Some employees filed cases against other persons. As a result, full RAJUK employees are suffering.

As a result, promotion of the eligible staff does not take place on time. Furthermore, political influence, RAJUK Chairman's influence and undue financial transactions are used in the promotion of RAJUK employees. It is alleged that some employees get promotion with the help of political reference and undue financial transaction. For example, there is an allegation that one employee was promoted by violating seniority and using political reference and an undue financial transaction of ten million Taka. The amount of bribery for getting promotion ranges from Taka 30 thousand to ten million. Again, due to mere political reasons, some employees did not get promotion, while their junior colleagues were promoted. Besides, the Service Rules provide that there is a scope of promoting RAJUK employees for the positions of deputy director or equivalent and director. However, in many cases government officials are deputed for these posts from respective ministry<sup>3</sup>. It creates frustration in the deprived permanent officials of RAJUK.

### ***3.2.1.3 Limitation and irregularities related to skill development and training***

Foreign and in-country foundation trainings are provided to the RAJUK staff to improve their efficiency. The mid-term and short term training courses related to office administration and management are conducted by RAJUK personnel. Every employee gets foundation training and some other relevant trainings, which are not sufficient for proper development of skills and efficiency required for proper monitoring of development activities and accomplishing other duties. This is to mention that from July 2014 to June 2018, a total of 864 persons were trained locally and 100 persons were trained outside the country (RAJUK, 2015; RAJUK, 2016; RAJUK, 2017; RAJUK, 2018).

There are allegations of irregularities made in the process of selection of members for foreign study visit or training. The staff those are deputed from ministries usually get the opportunity to receive the foreign study visits or trainings. The Chairman of RAJUK nominates the staff for foreign visit and training. In those trainings, RAJUK chairman, members, directors and even the officials of Ministry of Housing and Public Works and other ministries mainly get the priority. As a result, the RAJUK employees who are involved with the implementation of projects are deprived of training and gaining knowledge. However, training program is kept in every project planning, though it is not carried out through a formal need assessment.

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<sup>3</sup> At present 24 persons (excluding the chairman and members) are deputed as employees of RAJUK

## 3.2.2 Financial Management

### 3.2.2.1 Surplus income and expenditure of allocated budget

RAJUK depends on its own revenue and capital income for its management and adoption and implementation of projects. In addition to its own projects, RAJUK receives government grants to implement government annual development projects. An analysis of RAJUK 's income and expenditure shows that it has become a profitable institution despite being a service oriented organization. Estimates from the period from fiscal year 2014-2015 to 2017-2018 show that RAJUK has a surplus income (from 25.3% to 60.1%) in every fiscal year (Table 4).

**Table 4: Income and Expenditure of RAJUK (million Taka) <sup>§</sup>**

Financial year	Revenue Income*	Capital Income <sup>#</sup>	Total Income	Allocated Fund in RAJUK Budget	Operational Expenditure	Investment and Other Expenses	Total Expenditure <sup>§</sup>	Surplus Income (% of total income)
2014-15	2381.9	12670.5	15052.4	12108.8	391.9	7723.0	8114.9	6937.5 (46.1%)
2015-16	2311.8	40793.8	43105.6	17467.1	581.1	17899.3	18480.4	24625.2 (57.1%)
2016-17	2459.3	33909.4	36368.7	22484.8	734.6	13761.4	14496.0	21872.7 (60.1%)
2017-18	4933.8	14197.8	19131.6	16553.7	772.3	13512.4	14284.7	4846.9 (25.3%)

Source: RAJUK Budget (given information in the table is not consistent with RAJUK's annual report)

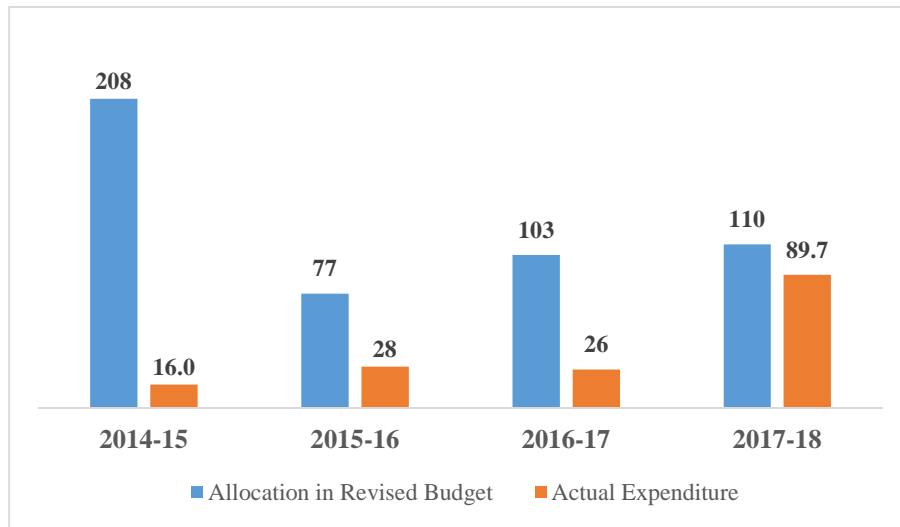
<sup>§</sup>In the table accounts of Government grant is not included

\*Revenue Income: Leasehold land income, lease per hectare, income from shop and market, service fee, rent, etc.

<sup>#</sup>Capital Income: New capital premium from development work

However, there is a gap of efficiency to implement the planned activities properly. Moreover, the allocated budget is not spent properly. For example, to meet the needs of transport, furniture and other equipment allocated amount in revised budgets were not spent (Figure 3).

**Figure 3: Annual allocation in revised budget and expenditure in transport, furniture & equipment (Million Tk)**



### **3.2.2.2 Limitations related to allowance or conveyance**

There is no allowance allocated for the inspectors, senior inspectors and surveyors for their field level activities. Even there is no provision of giving them conveyance for field supervision. Only a few inspectors have been provided with motorbikes and fuel cost for their inspection in the fields. Although allocation was made in this sector every year from financial year 2014-2015 to 2017-2018, the allocated money was spent on procurement of motorbikes only in the financial year 2017-2018. Moreover, as most of the inspectors have not been provided with motorbikes, they tend to recover their transport cost by collecting tips from the service recipients.

### **3.2.3 Infrastructural and logistics supports**

There are infrastructural problems in RAJUK. Infrastructures of RAJUK head office are not sufficient to house all the staff properly. It was observed in many cases that two or three staff have to share a small room. This situation is worse in the newly established zonal offices. Most of the zonal offices are in poor condition and lack of sufficient seating capacity. Among the four zonal offices two of them do not have their own office buildings. Even in the zonal offices, all sectional services are not available. For the services from accounts, estate and other sections, service recipients have to come to the head office.

Moreover, as an institution RAJUK is alleged to be less women friendly. There is no day care center for children in the RAJUK premises. In RAJUK premises, there are insufficient toilets, especially for the female staff, both in head and zonal offices. Moreover, there is no separate

toilet for female visitors. Apart from this, there is no arrangement for the persons with disabilities such as ramp<sup>4</sup> and sufficient other relevant arrangements.

Only the head office consists of a visitor room, which does not exist in zonal offices. Moreover, necessary furniture and equipment such as chair, cabinet, computer are not adequate in RAJUK offices. As a result, many important documents are kept on the table or floor. There is also inadequacy of official transport, for which the concerned officials are reluctant to visit the sites for monitoring.

### **3.2.4 Institutional coordination**

RAJUK plays a pivotal role for city development, although the leading national dailies often come up with regular reports on the corrupt practices of RAJUK. The news also reveals the dearth of coordination among the concerned offices, and inadequate services for the city dwellers.

For providing land use clearance, construction plan approval and preparing plan for different projects, RAJUK needs to maintain some coordination. However, there is a lack of coordination with relevant organizations such as land office (AC Land), Dhaka WASA, Power Division, Titas Gas, Fire Services and Civil Defense, Civil Aviation etc. If RAJUK seeks any documents, the other organizations do not attend to the need promptly. Sometimes they provide documents lately, which creates difficulties in their work and thus RAJUK takes long time for land clearance, construction plan approval and plan preparation of different projects.

### **3.2.5 Decision making**

RAJUK depends on the Ministry of Housing and Public Works for making any decision on recruitment, project approval and amendment of laws and policies. This dependency results in slower decision making of RAJUK activities especially those related to recruitment, project approval and implementation, and law amendment. There is also some other crisis between RAJUK and the ministry. For example, RAJUK raise the need for recruitment against vacant posts, but the ministry gives less priority to the quick approval to this decision.

## **3.3 Transparency regarding access to information**

RAJUK and its zonal offices have to exhibit its Citizens' Charter containing detail description of various types of services, the conditions and timeline of delivery. However, RAJUK does not display citizens' charter in open places of its zonal offices. In the head office, there is a board of citizen charter, however, detail information are not provided there. For example, fees related information are not provided there. Moreover, the information provided in RAJUK website are

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<sup>4</sup> A sloping surface joining two different levels, as at the entrance or between floors of a building.

insufficient. For example, plan approval fees depending on plot size and coverage of the building, as provided by the Rules, are not available in the. Furthermore, the list of documents required for land clearance and plan approval are not provided in the charter. Even the date of last update is not available in the charter. During the observation it was found that the citizen charter contained the name of the former Chairman; not the current one.

There is insufficiency of necessary and updated information in the website. The detail budget, audit report, updated annual report of fiscal year 2016-2017 and 2018-2019, class wise human resource information, project proposal, plot and flat allotment criteria, category and their percentage or quota in different housing projects are not available in the website.

### **3.4 Accountability**

#### **3.4.1 Inadequate monitoring**

There are allegations of lack of monitoring of RAJUK's activities by the relevant ministry. The chairman and members of the board are deputed from different ministries or departments and there are also 24 deputed employees at other levels. It is alleged that the deputed Chairman and the members of the Board are not ensuring accountability of the deputed staffs at the subordinate level properly. Moreover, the service rules of RAJUK is not applicable for the deputed employees. Another discrepancy is that in spite of holding the same position one director is given the responsibility to oversee the activities of other directors at the zonal offices. It hinders effective and accountable management of RAJUK at the zonal offices. Moreover, it is alleged that RAJUK officials are not properly punished for their offences. The national integrity strategy (NIS) is not being implemented properly in RAJUK. It has not yet introduced the provision of giving ethics award to the officials based on their integrity practice. On the other hand, for violation of integrity exemplary punishment is not given to the perpetrators. Furthermore, there are allegations against two of the members of the parliamentary standing committee on the Ministry of Housing and Public Works, who own construction firms. This is completely a conflict of interest and creates risks to ensure accountability of RAJUK.

There is lack of lack of effective monitoring in the implementation of RAJUK's activities especially the surveys for land clearance, activities related to building construction, implementation work after providing work order under RAJUK project, private project after approval, and for preserving playgrounds, open spaces, parks and natural water bodies. Inadequate supervision by RAJUK results in the indulgence of violating laws and regulations by the service recipients. Moreover, when the owner of the building is influential the inspectors fail to do their inspection properly. Even there were allegations of ignoring their complaints by higher authority. Apart from this, there are some challenges that hamper the plan approval of building. Moreover, the meetings are not called regularly and the serials are not maintained properly.



In order to preserve the playgrounds, open spaces, parks and open water bodies, there is an obligation to take permission from the government, if anyone wants to change the category of any designated place. However, due to lack of adequate monitoring such categorized places are developed without permission.

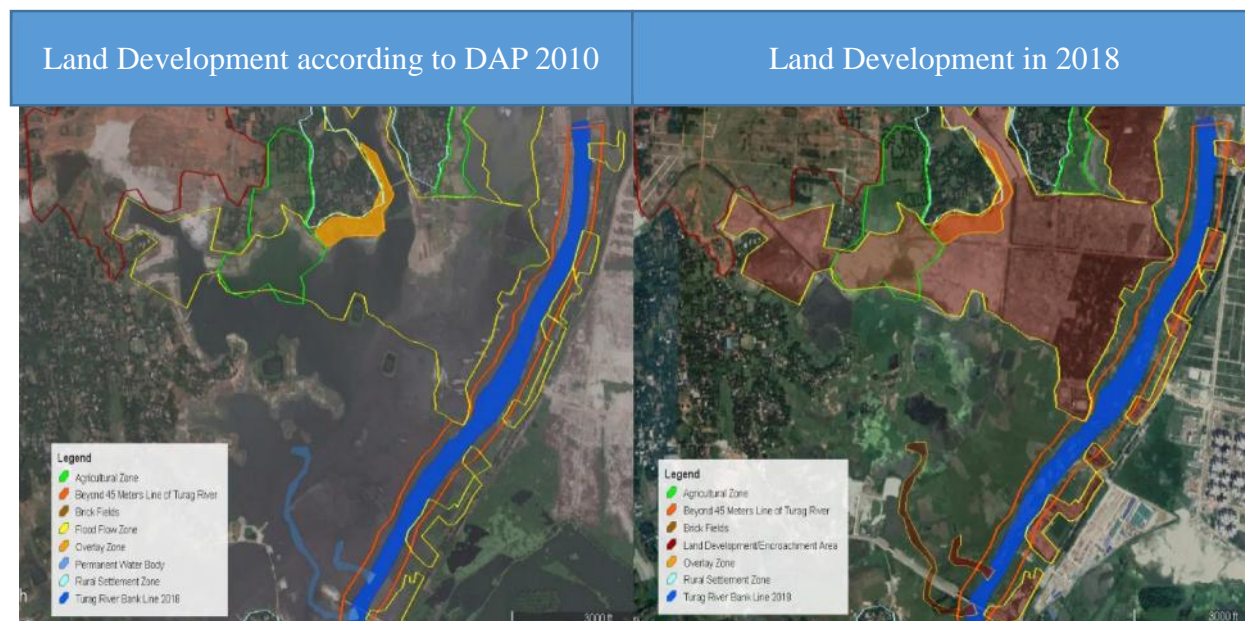
There is a lot of allegations of filling playgrounds, open spaces, parks and natural water bodies without prior permission for changing class of lands from RAJUK. It was found that RAJUK’s action against these allegations was limited to issuing notices or filing cases rather than abolishing the undue development activities. Moreover, the application of the punishment against the violation of such law (up to five years’ imprisonment or a fine not exceeding Tk 50,000 or both) is limited.

**Table 5: Land development along Turag River & Sand filling of Natural Water Bodies in Savar**

Activity	Area of Land (Acre)		Number of Project	
	2008	2018	2008	2018
Land Development	21	445	9	50
Sand Filling	6	17	7	11

Source: CEGIS<sup>5</sup> and TIB, 2019

**Figure 4: Encroachment of flood zone\***



*\*(violated the Natural Water Body, Open Space, Park, Playground Protection Act, 2000 and Detailed Area Plan (DAP) 2010 in Savar Area); Source: An upgraded version using the information of CEGIS and TIB, 2019*

<sup>5</sup> Center for Environmental and Geographic Information Services (CEGIS)



For example, data (Table 5 and Figure 4) shows that land development and sand filling activities are increasing day by day in Savar area due to lack of supervision and some other challenges. There are more examples that are similar. For an instance Boalia canal occupation and filling of its major parts by Police Officers Housing Society Project can be cited, which was done without changing the class of land and getting the project approval. Another example is taking initiatives to develop a project by capturing one acre of land at Khilgaon Park by the Ansar and Village Defense Party (VDP). As a result, playgrounds, open spaces, parks and natural reservoirs are getting unprotected and grabbed and thus the Natural Waterbody, Open Space, Park, Playground Protection Act and Detailed Area Plan are being violated.

### **3.4.2 Gaps in grievance redress mechanism**

RAJUK has a formal grievance redress mechanism. If any service recipient wants to lodge any grievance, s/he has to apply to the concerned department relevant to her/his complaint. If the person is not satisfied, s/he has to apply to the secretary of RAJUK who is a focal point of grievance redress system. If the person is not satisfied with focal point's measures, s/he has the option to apply to the chairman of RAJUK. In most of the cases the Chairman solves the problem through public hearing. Most cases of the grievance are related to building construction, plot and flat allotment and transfer. However, there are some gaps in the current mechanism. As there are various zones and departments, the grievances are not centrally registered and there is a lack of central information management system about the report of solved cases. Moreover, in many sections register is not maintained to document the complaints and resolved cases. For example, complaints at the planning and implementation section are not recorded in separate register. Moreover, in many cases RAJUK is unable to solve building related problems due to the lack of moral capacity to fight with powerful persons or because of their undue involvement in irregularities.

### **3.4.3 Gaps in public hearing**

Public hearing is an important tool of ensuring accountability towards the service recipients. In RAJUK, two types of public hearings are held, which are described below.

#### ***Public hearing organized by RAJUK***

RAJUK holds public hearing on every Wednesday, which is subject to availability of complaints. After sorting and verifying the submitted complaints, the complainant and the relevant employees are required to be present. However, the hearing session is neither open to the public nor to the media. Therefore, the basic element of public hearing is absent. According to RAJUK data, during 2016-2018, a total of 336 complaints were lodged for public hearing. In these public hearings, problems related to land-documents were solved in some cases. However, the public

hearings were unable to solve plot allocation related problems as it takes long time to solve. Moreover, it was found that RAJUK was unable to solve the problem if they identify that the plot was sold by means of falsification.

### ***Public hearing organized by Anti-Corruption Commission (ACC)***

On 27 January 2016, The Anti-Corruption Commission (ACC) organized public hearing on RAJUK and a follow up hearing on 14 December 2016. In two public hearings, 111 complaints were lodged. During the hearings, 33 complaints related to RAJUK's functions were raised. The rest of the complaints were not raised since the complainants were absent. Among the raised complaints (33), 84.8% were related to disputes of allocation and getting possession of the plots. In the hearings, four complaints were rejected for being non relevant. It was found that the ACC does not have updated information on the status of implementation of the decisions taken on the remaining 29 complaints in the hearings. Among the 29 complainants, information of 11 cases were collected and it was found that nine of the 11 complainants did not get their problems solved within the stipulated time. Moreover, it created a concern. After the hearing when they went to RAJUK for further services, they were refused to provide service by the concerned RAJUK officer. They also experienced misbehavior.

### **3.4.4 Undue financial transaction in the audits of financial activities**

Financial audit is a vital part of ensuring accountability. In RAJUK, mainly two types of audits are conducted – audit on different types of works of RAJUK by the government audit team (Works Audit Directorate under the Office of the Comptroller and Auditor General) and audit on financial accounts by external auditor (Chartered Accounts firm). Moreover, internal audit section checks financial transactions. The main duty of this section is to settle audit objections. This section collects and checks all replies against the audit objections prepared by relevant departments. The replies with evidence are sent to the Ministry of Housing and Public Works. To settle the objections, the internal audit section follows three ways:

- For the general objections (less irregularities), they discuss with the Works Audit Directorate.
- For the objections indicating high level of irregularities, they discuss with Works Audit Directorate and Ministry of Housing and Public Works.
- For draft objection indicating objection included in the report of OCAG, they discuss with Works Audit Directorate, Ministry of Housing and Public Works and Public Accounts Committee.

There are allegations of various types of irregularities and corruption in the form of bribery and providing undue gift and entertainment during the audit in RAJUK by OCAg. The bribery influences the audit team to manipulate the audit report. It is also alleged that if the bribe money or gift is not given, major problems are highlighted in the audit report. For entertaining the audit team during the audit period, RAJUK spends an amount ranging from Taka 20,000 to 25,000 every year especially for snacks and lunch.

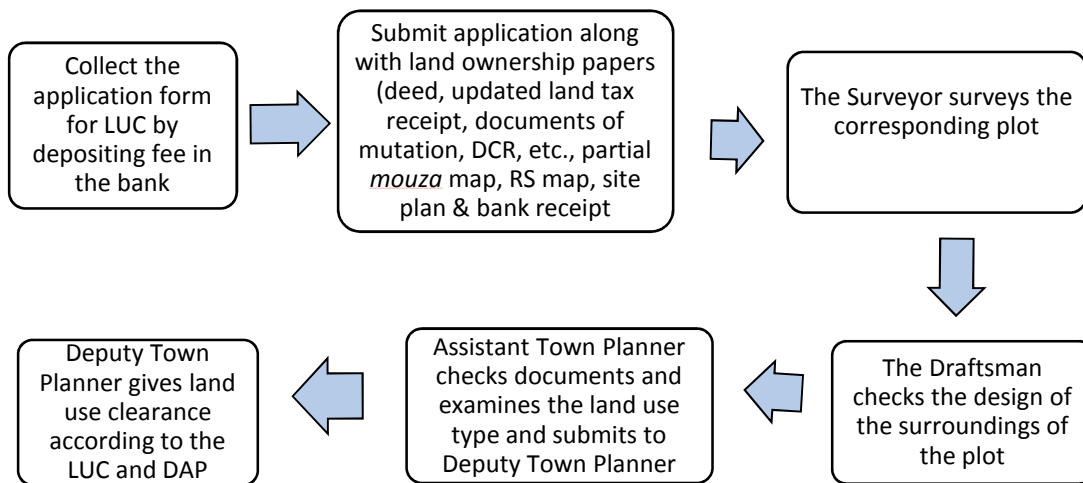
## Chapter Four

### Major Governance Challenges of RAJUK

#### 4.1 Land use clearance (LUC)

According to Greater Dhaka Building (Construction, Development, Conservation and Demolition) Rules, 2008, land use clearance must be collected before applying for approval of plan of a building. It is essential for all private and public as well as individual buildings. For private and government approved housing projects in RAJUK jurisdiction, no objection letter is provided from RAJUK. Land clearance is provided by the Town Planning and Implementation section of RAJUK. This section issues land use clearance and gives permission for development according to the Structure Plan and Detailed Area Plan. The following flow of actions are followed to obtain land use clearance.

Figure 5: Procedure of land use clearance



Source: RAJUK, 2019

Before 17 June 2019, CS/MS map had to be submitted with the above documents. Since May 2019, RAJUK has been providing online clearance from all zonal offices. Before May 2019, they provided online clearance from the zone number 3, 4 and 5. For online application, service recipients need e-mail address and active mobile number. For the online application they provide first page of deed and scanned copy of other documents. From fiscal year 2014-2015 to 2017-2018 RAJUK provided 17,469 land use clearances.

**Table 6: Number of land use clearance**

Type of service	Fiscal year			
	2014-2015	2015-2016	2016-2017	2017-2018
Land use clearance	3,632	4,238	3,588	6,011

Source: RAJUK, 2019

According to the Greater Dhaka Building Rules, within 30 days from the day of submission of application with all updated documents, clearance of land use is provided. Nevertheless, for more convenience of the service recipient, it is now 15 days mentioned in the RAJUK's citizen charter.

If a land clearance is rejected by the Deputy Town Planner, the service recipient has to apply to the chairman of RAJUK and according to chairman's decision the land use clearance is approved or rejected within 30 days after the application. If the application is rejected again, the recipient can apply within 60 days to the chairman of the board of RAJUK. The board with the opinion of Nagar Unnayan Committee provides decision for approval or rejection of the application within 30 days. According to board's decision, land clearance is provided.

The validity of land clearance certificate is two years. If a person does not take approval of plan of a building within two years, s/he has to take clearance again. During the approval process of land use clearance, various types of limitations prevail in the organization and in the process. Moreover, irregularities and corruption also occur, which are mentioned below.

#### ***4.1.1 Limitations in the institution and online process***

At present, besides online application, service recipients are required to submit all required documents manually as the server and bandwidth capacity of RAJUK does not permit to upload and download all documents. Most of the service recipients do not have enough knowledge to upload documents, as there is no detailed online guidelines and proper awareness programmes for online application or uploading documents for land clearance. As a result, all recipients have to come to the RAJUK physically and take help of RAJUK officials to upload necessary documents.

For the survey purpose of land clearance, surveyors go to field for survey but there is no provision of providing allowance or conveyance for the purpose. However, they tend to fill in the gaps through unfair means, which they do by taking undue money from the service recipients. After the survey, drafts-man also follows the same means (sketch of the plot and surroundings) of the surveyor. It increases the time span for land use clearance.

There are only four deputy town planners recruited against approved eight posts who are responsible for final checking and providing land use clearance. Moreover, they have to work in two stations – in head office and zonal offices. They have to do some works in head office for plan preparation purpose. During that time, their works in zonal offices do not proceed on. As a result, piles of documents remain untouched for a long time, which results in delaying the clearance.

#### **4.1.2 Illegal contract, embezzlement and undue influence**

Field observation suggest that most of the service recipients go through a deal for land clearance with the brokers (*dalal*). The brokers can be the outsiders or even some RAJUK officials also work like insider broker. Sometimes the outsider brokers embezzle the unauthorized money taken from the service recipients. Therefore, most of the service recipients prefer contracting with the insider brokers. The brokers influence the high official of RAJUK for giving clearance and they use the influence of political leaders or provide unauthorized money in this regard. However, if the service recipients are themselves the high influential persons, they get the clearance within due time. Nevertheless, sometimes instead of undue contracts and influence, the concerned officers cannot provide clearance due to the mismatch of the land type with the DAP. However, some influential persons can even influence RAJUK to go for a review of the DAP in order that they can get the approval of their land clearance by changing the land type.

#### **4.1.3 Delay in land use clearance service**

The existing size of human resources and system of land clearance are not likely to help the RAJUK to provide land clearance within due time mentioned in the citizen charter. The RAJUK officials argued that they are unable to provide the clearance within the stipulated time as the checking of land documents takes long time. Sometime, they find mismatch in the location of plots in the maps. As there is no central land registration database, they need to collect some documents from land authority (AC Land Office) and if the plot is beside the highway, they need to collect some documents from highway authority. Moreover, the relevant government authorities do not provide the documents on time. Sometimes, the land owner(s) do not remain available at the site during the survey. These limitations linger the time of providing land clearance. Moreover, if the clearance is not approved at the first attempt, it takes more time as it includes chairman's opinion and other necessary procedures. Apart from these, without the undue influence and contract, service recipients are not provided with the land clearance on time. In most of the cases, RAJUK provides the land clearance within 1-2 months whereas the stipulated time is 15-30 days.

Moreover, there are allegations of missing documents from the submitted files. An individual or group of service recipients apply for land clearance with some documents. Due to space

constraints and negligence of RAJUK officials, sometimes some documents are lost from the file. It lingers the land clearance procedure.

#### 4.1.4 Unauthorized payment in land use clearance

The citizen charter and the Greater Dhaka Building Rules specify that the due amount of fees for land clearance. However, field data suggest that the service recipients had to pay extra money to get the land clearance in almost all cases. The size of bribe money depends on some variables such as the road width, plot size, plot type, location, service recipient (individual or real estate developer) type and number and broker type.<sup>6</sup> For the developers and the groups of service recipients have to pay more than an individual. The amount of unauthorized money required for land clearance ranges from Taka 15000-80000. For the developers, the extra amount of unauthorized money for land clearance ranges from Taka 1,00,000-10,00,000. There is also an allegation of providing land clearance by violating land type provided in the DAP and the Greater Dhaka Building Rules in exchange of a high amount of bribe from the service recipient.

**Table 7: Unauthorized payment in getting land use clearance**

Purpose of Service	Fees	Unauthorized Payment (Taka)	
		Individual or multiple persons	Real Estate Developer
Survey for land clearance	No Fees	2000-5000	2000-5000
For widening road	No Fees	20,000-30000	No information
Total package for land use clearance (up to 10 stories)	1000 +15% Vat	15,000-80,000	1,00,000-5,00,000
Total package for land use clearance (11 stories and above)	1000 +15% Vat	No information	3,00,000-10,00,000

The survey of plot is the primary and most important stage of land clearance. It is the only physical stage where surveyor can directly contact the land owners and take the opportunity to make an undue contract and take unauthorized money. However, RAJUK does not ignore this procedure as there is no central database of land registration. Moreover, the surveyors work as broker. The amount of unauthorized payment increases if the road width is lower than 12 feet. With the help of the surveyors, the land owners increase the road width in paper so that s/he

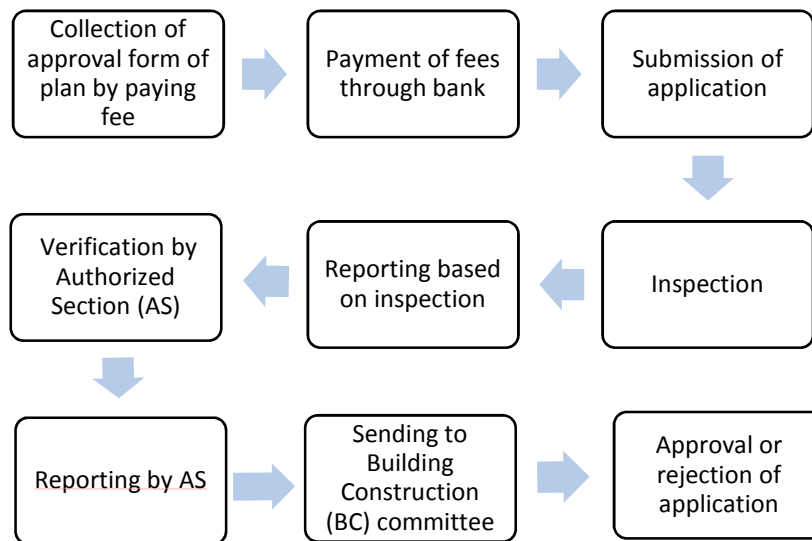
<sup>6</sup> In some cases, high-level officers do not take bribe, but due to undue contract with broker and non-availability of allowance or conveyance for the surveyor, service recipients are compelled to pay extra payments.

can get the clearance smoothly. The amount of unauthorized payment for widening road ranges from Taka 20,000-30,000.

#### 4.2 Approval of building-plan

The approval of building plan is managed by a separate section called 'Development Control' led by a member. This wing is formed to regulate building construction activities and plans. The procedure of the approval of building plan requires several stages (Figure 6) starting from collecting application form. The procedure includes the payment of fees as well as submission of application along with supporting documents including receipt of payment of fees through bank, ownership related documents such as- deed, tax receipt, copy of mutation and DCR, land use clearance, clearance for special projects, copies of clearance from the respective institutions, eight copies of approved plan etc. The amount of fee depends on the area of floor of the proposed building. When the application reaches the authorized section, the respective authorized officer assesses and gives opinion with sorting and verifying the land use clearance, report of the inspector and the (proposed) plan. Then the application is sent to the Building Construction (BC) committee. The BC committee finally approves or rejects the application. If there is any fault or flaw in the document, it is sent back for correction. The authorized section is entrusted with the responsibility of giving permission for construction of building.

**Figure 6: Procedures of approval of building plan**



Source: RAJUK, 2019

An approval of plan should be given within 20 days from the day of submission of application or information or document (if required) is provided, (RAJUK 2019). According to the Building



Construction Rules, 2008, the approved plans are valid for three years from the time of approval of plans (paragraph 25). For construction of high-rise building, earlier the owner would have to collect clearance from ten authorities<sup>7</sup> of the capital city (paragraph 8-12). However, the list has been reduced to two including fire and power division to curtail harassment of the service recipients (RAJUK, 2019). According to the Building Construction Rules, 2008, the authorized person can inspect the construction to see how far the approved design, report and specification is being followed. However, instead of mentioning the level at which the inspection is to take place, the Rules included that the inspector may visit any time from sunrise to sun-set (paragraph 28).

#### 4.2.1 Unauthorized payment for approval of plans

Despite there are specific information of the amount of fees disclosed proactively through website and the procedure of online application has been initiated, field data suggest that the service recipients made unauthorized payments for services. Field data further suggest that the planning permission may not be possible without unauthorized payment. All the service recipients interviewed got their plans passed by making extra payments other than the required fees.

“The whole process of planning approval is corrupted. This is open secret.” - a public official.

**Table 8: Unauthorized payment for approval of building**

Nature of service	Fee for services (Taka)	Amount of unauthorized payment (Taka)	
		Personal level	Real estate developer
Approval of plan (Up to 10 stories)	(175 - 83,000) +15% VAT	50,000- 4,50,000	2,00,000- 10,00,000
Approval of plan (Above 10 stories)	(83,000 - 3,65,000) +15% VAT	Information not available	15,00,000 – 40,00,000
Large or special project	No fee required	Information not available	15,00,000 – 2,00,00,000

<sup>7</sup> Ten authorities include Power distribution companies, City Corporations, Bangladesh Police, Gas transmission authorities, Transport coordination authorities, Water and Sewage Authority (WASA), Roads and Highways department, Archeology department, Water Development Board, BIWTA and BRTC.

The amount of unauthorized payment depends on some factors such as the size of land, location of land, height of the building, number of stories (levels) etc. Furthermore, the number of the owners is also considered in fixing the unauthorized payment. Again, the amount also depends on the nature of the use of land – residential or commercial. The type of broker is another factor – an influential broker having strong communication with higher level officials may help with a smaller amount of money or without money. Moreover, if there is a violation of rules from the recipient side, a higher amount of unauthorized payment will be required from the brokers.

“To go to RAJUK is like slaughtering a chicken for five times,” said a service recipient.

#### **4.2.2 Delay in approval of plans**

According to the Building Construction Rules (2008, Rule 14), the authority is supposed to give approval within 45 days. If the application is found incomplete or defective, the authority must let the applicant know in written within 15 days of the application. However, field data suggest that none of the respondents got their plans signed on due time. The minimum time of getting approval of building plan was four months. In some cases, it took even several years. It required even longer time for the ten-storied buildings and above, for example, two to three years. As the officials of RAJUK claimed, there are reasons for the delay. They argued that if the clients do not submit all required documents or if it takes more time to collect clearance from the authorities or if the plan is faulty, it takes time to approve the plan. On the other hand, the service recipients complained that the delays are obvious if there is no strong influence from the service recipients. Genuine papers are kept idle without influence in any means.

“If unauthorized payments are not made they (the RAUK officials) linger time in providing service. But if extra payment is made, it is possible to get approval within one month.”  
- A service recipient

#### **4.2.3 Irregularities at the inspection level**

Inspection is a mandatory part of approval procedure. Inspection is conducted by the inspectors, authorized officers and assistant authorized officers. During inspection, the inspectors examine construction of building vis-a-vis the approved plan, compliance with the set-back rules etc. The authorized officers monitor the inspection activities. Field data suggest that inspection of the building is even handled by the brokers in most cases. Therefore, generally the land owners do not know about whether the inspection is conducted by the authority. However, the contracting firms or persons argued that they have to pay bribe for having positive report from the inspectors. It is an important part before giving permission for constructing a building. But this stage also generates another opportunity for making unauthorized payments.

The inspectors were commented as ‘desperate ones’ to seek ‘rents’. The amount of unauthorized payment made to the inspector ranges from Tk. 5,000 to Tk. 1,00,000. It is believed that if the payment is not made, the inspector will provide negative report about the quality of the building construction, which may incur more costs and that may be twenty times of the amount given to the inspector. In some cases, the inspectors visit for several times especially when there is a likelihood of non-compliant buildings. The amount of unauthorized payment also depends on the location of the building. For example, the amount of kickback is less in Mirpur and more in Gulshan. However, in some cases the inspectors find themselves disempowered and become compelled to give positive report in favour of the owners, and it happens when they find the owners politically powerful.

“When the inspector finds irregularities, they tend to visit more which allow him to secure more rents.” - A RAJUK official

There are allegations that the inspectors usually do not conduct the inspection on their own. Rather they get the inspection conducted by assistant inspectors or they employ few (five to seven) persons including few engineers who make the field visit and find out loopholes in the construction of building and collect unauthorized money in favour of the inspectors. Field data suggest that in every inspection an inspector collects an amount of five to ten thousand taka as unauthorized money. They prefer visiting the places where they find the possibility of violation of rules by the land owners. The service recipients tend to at least extend their balcony by violating approved plans, which they negotiate with the inspectors.

It is alleged that the inspectors were sometimes compelled to ignore violation of rules in some ‘sensitive’ cases such as those by few powerful persons. For example, a building owned by a political leader cum businessman was not demolished as the inspector’s life was threatened. Another high level government official was alleged to deviate 100% of the approved plan. When the inspector was doing his inquiries, he got a phone call from a RAJUK high official that instructed the inspector to leave the house immediately.

***Institutional challenges for inspection:*** There are some challenges of inspection at the institutional level. There is limited number of inspectors in RAJUK, which is not sufficient to cover the vast areas of the capital city. Moreover, the inspectors are not provided with adequate cost for visiting the sites. They are not provided adequate transport too. Furthermore, there is no allocation for logistics required for the inspection.

#### **4.2.4 Undue influence and embezzlement by the brokers**

Approval of plan is impossible without a broker, refereed by the service recipients. As mentioned earlier, the brokers can be both from RAJUK official and outsiders. The amount of unauthorized payment and the time of getting approval depend on the influence of the brokers. Field data suggest that some of the outside brokers have their ‘permanent’ desks at RAJUK office. They also have visiting cards.

“One should find out a broker for approval of plan.” -A service recipient

#### **4.2.5 Fraudulence and harassment**

There are allegations of fraudulence against some individuals who introduce themselves as brokers and collect money from the service seekers in RAJUK. However, after getting the money, few of them cheat on service seekers; they do not provide any assistance in getting the plan approved. Study also found some of the respondents facing fraudulence. For example, there are allegations one of the respondents being professional, suffered from fraudulence of the brokers. The brokers copied his signature. And got them signed. Although the perpetrators had been identified, and about more than five years had passed no initiative had been taken. The employees of RAJUK blame people for not going directly to them for services and for going to the brokers. But on the other hand, the service recipients say that the employers give them ‘chirkoots’ (small piece of paper) with their contact numbers secretly saying that they should communicate with them later on for help.

#### **4.2.6 Violation of laws**

It has been revealed by a survey conducted by RAJUK that about 70% of the buildings of Dhaka city have violated building codes (Amin, 2019). This study found that the violations occurred at different levels that range from preparing faulty plans to faulty application of approved plans to violating height limits, violating approved plans, not maintaining set-back rules etc. These allegations are also found against renowned buildings of the city such as FR tower, Awal Centre, Ahmed Tower, West Inn, Jobbar Tower etc.

##### **4.2.6.1 Violation of set-back rules**

One of the important provisions initiated by the Building Construction Rules, 2008 is the introduction of set-back rules to control the development of land. Floor Area Ratio (FAR) is the principal bulk regulation that controls the size of the building in a specific area. It is calculated by dividing the total area of floor by the total area of land. Plans for construction of building is approved according to the set-back rules. In 2016-2017, among the total applicants of more than five thousand, a number of four hundred of the applications were rejected. Among the

investigated cases, two had been rejected for not maintaining the setback rules. However, in both cases approvals for construction were managed later on by the means of unauthorized payments. Even width of road is also doubled in paper, if unauthorized extra money is paid. The total floor area can also be increased in paper with the help of extra payments. Field data also suggest that after the plan is approved from the authority, the developers or individuals deviate from the approved plan. Even the mandatory open space is not maintained. The owners of the house also enhance the space at the upstairs in order to get some extra spaces.

#### **4.2.6.2 Violation of height restrictions**

Field data suggest that the building owners deliberately construct their building taller than the approved height limit. The owners do it themselves or advise their architects to do it. In most of the cases the height of the building is extended. One of the most striking case regarding this issue is the case of FR Tower at Banani in Dhaka. On 28 March 2019 fire broke out at the 8<sup>th</sup> floor of the 23 storied FR Tower, which caused a death of 25 persons and left 70 others injured. It is alleged that the Tower was built by violating rules through a 'tripartite entente' among the RAJUK officials, the developer and the owner of the land. Despite the violation of setback rules and also not having the clearance from Civil Aviation Authority and the Department of Environment, a plan of 18 storied building had been approved by the RAJUK officials. Even the approved plan was not maintained properly during the construction of building. The violation of rules includes violation of height restriction, not keeping sufficient parking space, making narrow stairs, changing the location of lift etc. It is evident that the lack of monitoring from RAJUK authority resulted in gross violation later on. The land owner got approval for constructing a building with 18 stories. But the building was extended up to a 23 storied building without prior permission from the RAJUK authority. The fire broke out in four floors in March 2019. Due to faulty construction of the building, fire fighters from the Fire Service and Civil Defense could not save 25 lives (Rahman *et al*, 2019).

#### **4.2.6.3 Violation of fire safety measures and keeping structural loopholes**

Field data suggest that none of the residential buildings takes appropriate fire safety measures, which is basically applicable relevant for high-rise buildings. However, some of the recent catastrophic fire incidents suggest that fire safety measures should be applicable for all other buildings in the cities. This is more applicable for commercial and industrial buildings, most of which are converted from residential and commercial buildings respectively. The reason is that the electrical and other utility arrangements are not converted or made feasible after the changed use of the buildings. Moreover, weak columns and narrow emergency space for

evacuation are some major reasons for catastrophic accidents and massive deaths for the fire accidents.

#### **4.2.6.4 Using residential spaces for commercial purposes**

The allegation of using residential spaces for commercial purposes is quite obvious. Without permission the residential buildings are being used for commercial organizations such as bank, shopping center, restaurant, etc. The RAJUK authority seem to be reluctant in most of the cases. But on the other hand rules are being purposively abused to harass few non-government organizations.

#### **4.2.6.5 Reluctance to collect occupancy certificate**

According to the Building Construction Rules, 2008, after completion (partly or fully) of construction, the owner of the building should take occupancy certificate from RAJUK. RAJUK is supposed to provide the certificate within seven days of the application. However, field data suggest that very few of the service recipients collect the occupancy certificates. Moreover, they do not have clear concept about it. According to the information received from RAJUK in August 2019, in previous five years, a number of 418 occupancy certificates have been issued. The service recipients argued that they did not collect the occupancy certificate as it might entrap them into unauthorized payment. The developers who were interviewed for this study also confessed that they did not take occupancy certificate. An expert argued that those who take occupancy certificates are 'extraordinarily meticulous and afraid of RAJUK'.

### **4.3 Development works or projects especially housing projects**

RAJUK undertakes development projects under the provision of TI Act, 1953 as improvement schemes. It identifies the priority areas for projects, prepares layout plan and detailed design of different projects, project proposal, acquisition plan for development projects and project profiles, estimates detail of construction, allots plot or flat in case of housing projects, documents all plot or flat related papers and takes necessary actions like lease deed, mutation, sale permission for plot or flat, *heba*, etc. and development of works or projects. RAJUK takes projects internally or from Government Annual Development Plan. Most of these development works of RAJUK are self-financed. At present nine projects are running, which include Purbachal New Town project, Jhilmil Residential project, Uttara third phase, Uttara apartment project, Gulshan-Banani-Baridhara Lake development project, Uttara Lake development project, Green Building project, Building Construction project in nine abandoned houses, and DAP project. In the whole process of initiation and implementation phases, there are some limitations or irregularities mentioned below.

### 4.3.1 Irregularities and limitations in initiating development projects

#### 4.3.1.1 Lack of peoples' participation and inclusiveness

According to the sixth and seventh five year plans, the National Urban Sector Policy 2011, a community-based approach especially involving active participation of the members of the poor community at all stages of design and implementation of infrastructure projects and in subsequent maintenance should be followed. However, in RAJUK, the development projects are not designed with the consultation of local people and other relevant stakeholders. They do not create database of affected local people by the projects. Sometimes they consult with members or chairmen of the local government institutions or influential persons i.e., political leaders, businessmen, etc. Though RAJUK takes projects for the lower and middle class groups, in reality it does not consider their inclusiveness properly. The income category and other considerations such as inclusion of women and persons with disabilities are not taken into consideration in determining the project quota and distribution of plots or flats; rather elites and influential persons are given priority. Moreover, flat prices are not determined considering the purchasing capacity of the lower and middle income groups. It is found that the value of the flat fixed at RAJUK is almost equal to the value charged by the commercial developers or real estate business houses (Table 9).

**Table 9: Charged price of RAJUK and Real Estate Developer in different area<sup>8</sup>**

Name of the Area	Price charged by RAJUK (per sq feet)	Price charged by Real Estate Developer (per sq feet)
Uttara	4,800 Taka (Uttara 3 <sup>rd</sup> phase)	4,000 - 7,200 Taka (Sector 5,7,9-14 of Uttara, and Dakshinkhan)
Lalmatia (E-block)	10,000 Taka	8,500 – 12,000 Taka

Apart from this, RAJUK does not sufficiently plan for providing plot to the persons who are affected by the projects and who own less land in the project areas. Rather specific conditions are given in the case of plot allocation for the affected people. For example, the affected persons who had less than 16 decimals of land in the Purbachal project were not provided with any plot.

<sup>8</sup> RAJUK and other real estate companies

#### ***4.3.1.2 Violation of the Dhaka Metropolitan Development Plan (DMDP)***

According to the DMDP, RAJUK or any other entities are not allowed to convert agricultural land to residential use in the designated sub flood flow or flood flow zones. However, in many cases RAJUK has taken different projects in these areas by violating the Plan. For example, Jhilmil Residential project, Compact Township Development project near Turag River, Purbachal New Town project, etc. Moreover, the DAP Review Committee recommended not to restrict the flow of water in flood stream or sub-flood flow areas and it was suggested to ensure the flow of water. Nevertheless, RAJUK itself has occupied many flood flow zones and implemented housing projects there. An expert argued, “RAJUK is the largest land grabber. Jhilmil, Goran (Chatbari) etc. are in the flood flow zone.”

#### ***4.3.1.3 Project planning without feasibility study***

In some cases, the project plan is prepared without conducting a feasibility study. Sometimes, they do not conduct soil test, Environmental Impact Assessment (EIA), etc., which are prerequisite for project development. In many instances, the feasibility study report is prepared without conducting field study.

#### ***4.3.1.4 Exploitation of local people***

In the initial stage, the acquisition of plot is accomplished by respective Deputy Commissioner's (DC's) Office. However, before the land acquisition, some government officers or their acquainted people or relatives of some officers of DC offices and some businessperson residing beside the project areas tend to spread fear among the local people with an intention to buy land from the residents at lower prices and get higher compensation as affected land owners from the projects. They also do it to get plot from the project as affected land owners. Field data suggest that in Purbachal area original landowners faced such type of exploitation. This happened as RAJUK did not gather the information of original land owners or affected people before taking any project. Moreover, small plots were allotted for some of the affected land owners.

### ***4.3.2 Irregularities and limitations in implementing development projects***

#### ***4.3.2.1 Gaps in transparency***

The projects proposal, plot and flat allotment criteria, category and their percentage in different housing projects, other plans of the project are not available in the website in the allotment phase. RAJUK allots the plots and flats in two ways. The first one is done through lottery after scrutinizing the application and the second one through respective government authority. According to the Article 13A of the Dhaka Improvement Trust (Allotment of Lands) Rules, 1969,



the Trust may allot plots to persons who have rendered remarkable contributions to the nation. As provided in this Rules, government can recommend for any person to provide plot under this category.

Moreover, the percentage of quota for different categories is high. Moreover, the allotment criteria are not open to all. In the website, information about lottery, allotment and transferrable plot to allottees are available. However, in certain cases the updated information of allottees according to plots is not available in the website and notice board. Moreover, there is an allegation that the lottery system is nontransparent. It is alleged that a manipulation was committed in some projects such as Uttara apartment project.

#### ***4.3.2.2 Missing files and documents***

There are allegations of missing files and documents of allottees or plot owners. Sometimes the files are recovered in exchange of money. A number of 700 files of plot owners were alleged to be missing in 2019 (*Jugantor*, 2019). In fact, the number of missing files should be more according to some key informants. Even the plot/flat owners are not allowed to see the file without unauthorized money. The record keepers in RAJUK show the file in exchange of unauthorized payment, which ranges from Taka 5000 to Taka 10,000. Sometimes, the brokers grab the file from the record keepers by the means of unauthorized payment. Then they change the name and pictures of allottees and sell the land to someone else. A number of 72 files were recovered from a room of 4<sup>th</sup> floor of RAJUK extension building (*Samakal*, 2019). This room was the office of a previous commissioner of City Corporation. As the commissioner was escaped, the broker groups were formed by centering that room.

#### ***4.3.2.3 Unauthorized payment***

There is an allegation that a portion of RAJUK officials are involved in taking unauthorized money during allotment of plots, transfer of plots or keys of flat and providing various services for documentation of the plot owners. There is an allegation of taking unauthorized money from some allottees of plots.

It is also alleged that RAJUK officials take unauthorized money during the transfer of keys of flats and the unauthorized payment ranges from Tk 2,000 to Tk 5,000. For all services such as lease deed, mutation, heba/transfer of properties/distribution, sale permission of plot/flat RAJUK takes extra payment. For lease deed, if some documents or files are lost, the amount of unauthorized payment increases. The extra amount of unauthorized payment in this regard ranges from Tk 50,000 to Tk 1,00,000.

**Table 10: Unauthorized payment in getting different services under the projects of RAJUK**

<b>Purpose</b>	<b>Govt. Fee of Service (Taka)</b>	<b>Unauthorized amount (Taka)</b>
Lease deed	31,000 - 60,000	50,000 - 1,00,000
Mutation (per plot)	10,000 - 25,000	10,000 - 50,000
Heba (per flat)	7,000 - 15,000	50,000 - 75,000
Sale permission of per flat	200 - 300 (per sq. feet)	18,000 - 75,000
Sale permission of plot	50,000 - 2,20,000 (per katha)	50,000 - 1,00,000

#### ***4.3.2.4 Exploitation through changing design and plot location***

It is alleged that by changing the principal design of any project, RAJUK prepares extra plots and distributes them into the service recipients. It also changes the open space and plot size in the projects. There is an allegation that RAJUK changes plots several times for most of its projects. In Purbachal, RAJUK has done it for five times and prepared additional new plots by changing location and design. Moreover, RAJUK also changes the location of plots by taking extra unauthorized money from the plot owners, which creates hassle for many of the plot owners.

#### ***4.3.2.5 Time consuming service***

There is a fixed time duration defined in the citizen charter for the delivery of services (transfer of plot, transfer of key of flat, documentation of owner of plot/flat i.e., lease deed, mutation, sale permission, etc.) of RAJUK. However, unless the service recipients do not pay extra unauthorized money, they are not provided with the expected service as per the stipulated time. Moreover, if the extra payment is high and the recipient is influential, s/he gets the service earlier than the standard time. The experience of the service recipients suggests that without extra undue payment, file cannot move.

#### ***4.3.2.6 Undue influence and unauthorized transaction in procurement***

In RAJUK, the procurement of logistics and development works of project is processed through open tender and quotation method under Public Procurement Rules (PPR), 2008. After providing any contract, RAJUK monitors the development works. However, sometimes the contractors change the design of the project which the RAJUK official cannot monitor due to the undue influence of the contractors as alleged by RAJUK officials.

In RAJUK, the submission of the tender schedule in case of open tender is executed through e-tendering. However, it is alleged that the contractors get the information in advance about the estimated price from RAJUK officials in exchange of illicit money and showing influence in many cases. The information on the estimated price is available to many RAJUK officials as the documents goes to many tables as part of processing, which are later leaked and reached out to the contractors with whom the RAJUK officials might have an undue working relations or conflict of interest.

There is another allegation that some RAJUK officials take unauthorized money from the contractors who are even awarded with the work orders through open tender and quotation method. In this case, the officials extort 2% money from the contractors' bill.

#### **4.4 Detailed Area Plan (DAP): Challenges of its implementation**

The first master plan was formulated in 1959 according to the provision of Town Improvement (TI) Act, 1953 (RAJUK, 2019). Then Dhaka was a provincial capital. The plan was prepared for an area of 820 square kilometers which was to be implemented by 1979. Then it was not possible to foresee about 1971 when this province emerged as an independent country. Later as a capital city Dhaka-centric activity increased rapidly. In the meantime, political turmoil as well as natural catastrophes such as flood of 1988 etc. let the government think about saving the city of Dhaka. Therefore, the second master plan of 1995 especially emphasized on two issues – embankment (*beribadh*), and pumping rainwater which included coordinated action-plan of two parts namely 'FAP-8A' and 'FAP-8B' that had been adopted. However, the second master plan the Dhaka Metropolitan Development Plan (DMDP) had been developed by 1995 which included an area of 1528 square kilometers. It included three stages. At the first stage there was a Structure Plan (SP) which was prepared to study the basic growth of the city and also to foresee the movement of the people. Then the Urban Area Plan (UAP) came at the second stage to work for sector-based policy development. Finally, at the lowest tier, the Detailed Area Plan (DAP) was to develop at the third tier of the DMDP. All those were to include various urban strategies, policies and development programs for providing guidelines, rules and procedures for planning, development and development control.

The overall objective of DAP was to implement the recommendations proposed by the Structure Plan and the Urban Area Plan. The DAP was to be prepared on the basis of detailed surveys and analyses and was to be implemented through community participation. The DAP was aimed at developing a local level plan with land-use zoning, infrastructure and utility. One of its objective was to protect flood flow zone from encroachment. While preparing the DMDP in 1995, it was proposed that the DAP should be prepared in the following five years (RAJUK, 2019).

The preparation of DAP was started in 2004. The total area had been divided in five parts and were awarded to five consultant groups. The jurisdiction of DAP included the areas from Gazipur Paurashava to the north, Dhaleswari river to the south, Bangshi and Dhaleswari river to the west and Shitalakkhya and Meghna to the east. Despite coordination challenges among the five DAP-preparing groups, the DAP was finally completed with help from a review committee that gave report with specific and strategic recommendations. One of the recommendations was not to keep the flood-flow and sub-flood flow zones. Finally, DAP was approved in 2010. However, a 'high-powered' DAP review committee is still working for 'parallel review' of DAP. The new revised DAP for the period of 2016 to 2035 is yet to be finalized while four years have already passed. All these arrangements are 'for preventing haphazard development' as the RAJUK Officials claimed.

#### ***4.4.1 Repetitive amendments and dilemma in finalizing DAP***

It took a long time to have an approved DAP. Again, the finalization of DAP is yet to achieve. A 'high-powered cabinet committee' was formed to finalize the DAP through reviews. But the committee has turned into an 'amendment committee' (Ahmed, 2018; Majid, 2019). The committee could not finalize the DAP in the last nine years. By this time continuous amendments have been made, which are alleged 'to serve the interests of the vested quarters' (Ahmed, 2018).

After the approval of DAP through a gazette notification in 2010, DAP has been revised for 158 times till April 2018, which have been approved by the 'high-powered cabinet committee'. Among the amendments, a number of 34 amendments were done to permit for filling up the water bodies while 14 others were for filling up flood-flow areas. A number of 20 amendments were made to cancel agricultural and rural settlements and 13 others were made to alter the land-use category of overlay zones (Ahmed, 2018). It is alleged that in the name of required amendments, the interests of the vested quarters were served. A 'tripartite entente' was made among the developers and real-estate business people, politically influential people and the RAJUK authority.

#### ***4.4.2 Violating DMDP Structure Plan***

The DMDP which was formulated during 1993-1995 with financial support from UNDP was meant for twenty years starting from 1996 to 2015. DAP was supposed to be prepared within a short period to implement the Structure Plan. However, the DAP has not yet been finalized. By this time, development works of various areas have been accomplished. Many of them are alleged to violate DMDP itself. It is also claimed that DMDP recommendations have been ignored in preparing DAP. Whereas it is the responsibility of RAJUK to monitor other entities so that they refrain from violating DMDP, in reality RAJUK itself is alleged to have violated DMDP. It has

developed housing projects in flood-flow, semi-flood flow zones and agricultural areas by violating DMDP. The projects include 'Jhilmil', Uttara (3rd phase), Jalshiri, Bashundhara, Eastern Housing etc. which have been built in the flood-flow zones. Through these projects the water retention areas have been covered up, which is conflicting with the master plan. There are allegations of pursuing undue influence by the politically and financially influential people and groups for the approval and implementation of these projects.

"RAJUK is the greatest land-grabber." – A specialist

#### **4.4.3 Conflict of interest**

The DAP has been reviewed for several times. However, the changes took place for the business interests of the politically and financially influential people and groups. There are questions being raised due to assigning a real estate company to review DAP, which has created a risk of 'conflict of interests'. It is alleged that those who are given the responsibility to save the city are likely to destroy it for their mere business interests. Therefore, the changes in DAP are resulting in waterlogging and vulnerability of the city dwellers. Furthermore, the zoning system for residential and commercial zones, has been changed some of which have violated the master plan. Regarding RAJUK's role in preparing and implementing DAP one of the specialists commented, "An offender, the police and the judge cannot be the same person" (Mowla, 2016).

"They (RAJUK) are both developer as well as approval authority /regulator. This is clearly conflict of interests." - A specialist

#### **4.4.4 Lack of inclusiveness and participation**

Participation of the community people is an important element at the implementation level for plans for making it consistent and coherent with peoples' interests. However, there are allegations of not engaging the concerned people properly. Moreover, there are criticisms of not allowing the experts to participate freely, fairly and effectively during consultation. Although it is claimed that the peoples' participation has been ensured in formulating the revised DAP, field data suggest that there were lacks of people's participation in this case.

#### **4.4.5 Lack of implementation plan**

Lack of implementation plan is regarded as one of the major challenges for the master plan as well as structure plan. The state of implementation of the DAP has been considered a complete failure (Mowla, 2016). Moreover, RAJUK had been criticized that it did not take any lesson from the past (Majid, 2019).

In a fast growing city like Dhaka, it is truly urgent to have a master plan immediately. However, due to delayed plans and actions, a proper and sound development of the city has been

hampered. Moreover, in one hand pro-poor development is not taking place and on the other hand it is challenging the achievement of SDGs.

## Chapter Five

### Causes of Corruption and Irregularities

#### 5.1 Lack of appropriate legal provisions and challenges in formulating laws

RAJUK and its services are governed by a number of laws and rules. But the legal framework is still in need of appropriate provisions. This has become a major reason for facing challenges by the service recipients of RAJUK. For the final approval of plans of buildings there is no mandatory provision for taking occupancy certificate. Even there are challenges of revising laws. One of the RAJUK officials mentioned that to get a law passed is not like Aladdin's lamp; you will have to spend money for it in different tables. Moreover, there are also issues of conflict of interest in passing laws. Furthermore, there is lack of appropriate provisions for imposing penalties on those who violate building codes.

#### 5.2 Insufficient monitoring and inspection

The procedure of land use clearance and approval procedure is plagued with lack of monitoring by the authority. To reduce the violation of building codes inspection is a very important tool. There is a very limited number of inspectors in RAJUK which hinders the inspection activities. Those who are approving the proposed construction plans are not responsible for ensuring adequacy and suitability of plans; rather those fall upon the concerned architect or engineer. Therefore, RAJUK's supervision and monitoring for maintaining compliance of these designs is not maintained. On the other hand, the owners are not eager to spend any more such as for inspection. Sometimes they get the plans signed by one entity and later they go for low cost constructions. The RAJUK authority is less likely to find out the violation as the plans are passed in their cooperation and in lieu of kickbacks.

#### 5.3 Gaps in coordination

A number of institutions are interrelated for ensuring services of RAJUK. For the approval of plan especially for those of special cases, the owners have to come in contact of various authorities. But there is lack of coordination among those institutions. There are occurrences that took place because of construction of buildings which are non-compliant with other authorities and relevant rules. But at the end RAJUK has to shoulder the responsibilities of the occurrences and for not making the owners of the buildings accountable to laws. For example, RAJUK blames the Fire Service and Civil Defense Authority for giving permission to construct FR tower so high. This also reflects lack of coordination among the authorities. Furthermore, for approval of construction of building the ownership of land is checked from different authorities. Sometimes it is checked

from the land office but the RAJUK officials blamed them for not being responsive. There is also lack of coordination with other relevant bodies such as Fire Service and Civil Defense, Civil Aviation Authority, Dhaka WASA, Titas Gas, DESCO etc., which contributes to delayed services and more points of bribery.

#### **5.4 Gaps in transparency**

Despite various initiatives for digitization and disclosure of information through using information technology, lack of information and transparency is still a crucial issue. It is claimed that 'automated building approval' has been introduced in May 2019. But this is confined up to the submission level. The later stages are to be handled manually and the kinds of harassments have remained unchanged. Moreover, the audit reports, budgets are not uploaded in the website. The annual reports are uploaded at a delayed time. The current issue of the annual report is not available in the website. Information of the approved plans are supposed to be disclosed through the official website of RAJUK. But this has been back-locked of a period of four to six years while the plan is valid till three years. Therefore, it is disclosed normally after the building is built. This disclosure of information is not helping to control the violations.

#### **5.5 Undue political influence and nexus between business and politics**

The TI Act has given RAJUK tremendous power to play its role. But in practice RAJUK relies more on the respective ministry. The ministry is also alleged to exert its influence over the decision making as well as implementations. Although ministerial influence doesn't involve creating posts but they influence promotions and also recruitment of the officials of the higher levels. The existing framework is facilitating opportunities to preserve the business interests at the cost of public interests. It is alleged that there is an unholy nexus among a portion of the RAJUK officials, developer companies and politically influential persons. This deep-rooted cause is putting challenges in the governance of RAJUK.

#### **5.6 The price of land**

The price of land or space in the capital is playing a vital role in the management of RAJUK. There is no initiative to control the price of the land. Therefore, the reckless increase of price of land is trapping more investment in this area which in turn putting pressure on the fringe areas. Without holding the rein of price it is impossible to establish governance of RAJUK.

#### **5.7 Gaps in political will**

RAJUK got major attention from different levels that should be transformed into action for fixing governance of the institution. There were several initiatives to identify and combat corruption in



RAJUK. In spite of having a strong legal basis like TI Act and later a number of acts and rules, RAJUK is suffering from ineffective digitization. The layout of the building is approved given that the occupancy certificate will be collected. But in practice occupancy certificate is not usually collected. Therefore, the implementation of law is relied upon the will of the owners. On the other hand, when an inspector is instructed to leave the house of a high official who violated the building codes, lack of political will for governance of RAJUK is reflected. There is no way for the building owners and the authority to alone ensure the accountability. The RAJUK has only the law that the building owners should collect but there is no provision to make it mandatory. There are many important projects required for the poor people and those are not being implemented. On the other hand, many projects are being taken at the interest of the people who are connected to the officials at the higher levels.

### **5.8 Gaps in accountability**

RAJUK's decision-making and executive authority is vested in the hands of RAJUK Board. Lack of delegation of executive power to the next level officials puts challenges to ensure accountability at the subordinate levels. Moreover, there are allegations of lack of monitoring of RAJUK's activities by the relevant ministry. On the other hand, the chairman and members of the board are deputed from different ministries or departments. There are also deputed employees at other levels. It is alleged that as the service rules of RAJUK is not applicable for the deputed employees, this is creating nuisance in ensuring accountability of those employees. Furthermore, there are allegations against two of the members of the parliamentary standing committee on the Ministry of Public Works and Housing. The national integrity strategy is also not being implemented properly in RAJUK. It has not yet introduced the provision of giving ethics award to the officials based on their integrity practice. RAJUK is still in need of appropriate mechanism for grievance redresses. Grievances are not centrally registered. Even the remedies are not reported properly.

Neither RAJUK nor ACC could make effective public hearing. The former one is done in a form of complain redresses while those are not public at all. The later one is not being able to make the RAJUK officials accountable. Conversely those had negative impact on the victims as the RAJUK officials tend to take revenge on them for going to ACC with complains.

There is lack of effective monitoring to implement RAJUK's activities, especially the surveys for land clearance or activities related to building construction, implementation of development projects of RAJUK etc. Inadequate monitoring by the authority of RAJUK results in violation of laws and regulations. Moreover, when the owner of the building is influential the inspectors fail to do their inspection properly. Even there were allegations of ignoring their complaints by higher

authority. There are both internal and external audits done as vital part of accountability. However, there are allegations of irregularities and corruption by the relevant employees.

### **5.9 Gaps in participation and inclusiveness**

While participation and inclusiveness are important indicators of governance, as an institution RAJUK is not being able to ensure adequate participation of its clients. There is very little participation of the relevant stakeholders in RAJUK's activities. It is especially true for preparation of the Detailed Area Plan (DAP). It is alleged that the development projects are not designed with sufficient consultation with local people and other stakeholders. Moreover, RAJUK does not take projects by creating database of local people. Sometimes they consult with the members or chairmen of the local government bodies or other influential people (i.e., political leaders, businessmen and so on). Although RAJUK takes projects for the lower and middle class groups, in reality it does not consider their inclusiveness properly. The income category, gender, disability etc. are not taken into account in determining the project quota and distribution of plots or flats. Project specific provisions are created for allotment of plots to the affected people. Moreover, for determining prices of flats, economic condition of the lower and the middle classes are not taken into consideration. Rather the price of the flats as fixed by RAJUK is almost equal to those of the commercial ones. Furthermore, many of the people who were affected by the projects, especially those who had less land and therefore did not get any plot. As an institution RAJUK is alleged to be less women friendly. There is no day care center in the RAJUK premises. The number of female toilets is not sufficient for the female employees there. For the female visitors there is no separate toilet. Moreover, there is no arrangement for the persons with disabilities such as ramp and other relevant arrangements.

## Chapter Six

### Conclusion and Recommendations

#### 6.1 Conclusions

The research endeavored to identify the governance deficits, corruption and irregularities in RAJUK, to identify legal, institutional and other challenges. It was also intended to explore the root causes of governance deficits as well as to recommend the strategies and effective measures to enhance governance. With the findings of the study that have been presented in the previous chapters it has been evident that governance of RAJUK has been plagued with irregularities and corruption of both public and private levels. Among the service recipients who were interviewed most of them made unauthorized payments other than the required fees. Furthermore, only unauthorized payment did not ensure services without the 'genuinely' linked brokers. Delayed service is another face of irregularity which is both an ill strategy of corrupt officials and an impact of continued irregularity in RAJUK. It becomes an instrument of the perpetrators when there is any fault in the application. In one hand it gives an impression of tentatively delayed service and on the other hand it gives an opportunity to play for raising the unauthorized cost of the service – the amount of bribe. A positive link has been found here as 'more deviation, more money'. The study also identified specific legal, institutional as well as political challenges. It has also intruded into the political economy of the corruption and irregularities persistent in the governance of RAJUK.

The study found that there are incentives for irregularities at the private sector as well. It is true for the personal as well as business levels. Unscrupulous entities especially the companies involved, have high incentives for profits. Therefore, violations are acute at the private business level. This has been reflected in various occurrences that were caused because of violation of building codes in recent years. Lack of integrity in business is taking away the fringe areas. Business interest combined with political power let the DAP be revised for several times. What is alarming here is that in the name of public interests the business interest combined with political ones are taking away the sustainability of the city which was one of the major goals of SDGs. Nevertheless, the other SDGs being linked with it are also getting hindered.

In the name of housing the poor are getting poorer. As they are losing their cultivable lands. On the other hand, the housing provisions being created, are not favorable to the poor people nor to the people of middle income. Rather those are contributing to the inequality of income among people.

The study identified specific legal, institutional as well as political challenges in the governance of RAJUK. It has also endeavored the political economy of the corruption and irregularities persistent in the governance of RAJUK. It seems that the role of RAJUK has been transferred from monitoring entity to a business entity. Conversely, the business entities are grabbing the role of public entities such as preparing DAP. All these are giving opportunities to preserve their business interests at the cost of public interests. An unholy nexus among a portion of the RAJUK officials, developer companies and politically influential persons the purpose of establishing RAJUK is being perished. On the other hand, the citizenry is being disempowered. The monopolistic position of service providers' bloc and absence of any point to challenge, let their power remain unchallenged. In this reality major initiatives taken so far have done very little to overcome its challenges. The initiatives taken for protection of the city dwellers from flood and water logging are less likely to endure effective results. Therefore, the livability of Dhaka is being hampered.

To sum up, it seems that the role of RAJUK has been transferred from monitoring entity to a business entity. Conversely, the business entities are grabbing the role of public entities. An unholy nexus among a portion of the RAJUK officials, developer companies and politically influential persons the purpose of establishing RAJUK is being perished.

## **6.2 Recommendations**

In these circumstances the following initiatives may be useful to overcome the limitations and governance challenges and restore governance in RAJUK.

### **Acts, Rules and Guidelines related recommendations**

1. Necessary changes should be made in the acts and rules; Basic rules and guidelines should be made as follows.

a. The Town Improvement Act, 1953, should be amended to define criteria for the selection of chairman and members to appoint in RAJUK. Provisions should be made to appoint persons who have relevant skills and competences. Provisions should be made to make the executive board more inclusive to include representatives from the civil society.

b. Under the Building Construction Act, 1952, the penalty for violating rules for the approval and implementation of the plan should be increased. Penalties should be imposed for not taking the Occupancy Certificate before use of the building.

c. Under the Greater Dhaka Building (Construction, Development, Conservation and Demolition) Rules, 2008-

- Along with the architectural plans which is submitted, the structural plan and fire safety plan of the building should be made mandatory to submit for approval of plans.

- The rule should be revised to make it consistent with Fire Prevention and Extinction Act which considers multistoried buildings having more than six stories.
  - Legal provisions should be introduced so that RAJUK officials should have the responsibility of ensuring adequacy and suitability of all designs along with the concerned architects or engineers.
  - The height limit of the buildings near the places of historical, architectural or environmental significance, should be mentioned specifically.
- d. Under the Dhaka Improvement Trust, 1969
- Necessary provisions should be made on 'quota' and criteria for being eligible for plots on the basis of "contribution at the national level".
  - The rules should include provision for ensuring plot or flat for affected people based on equity; In the short and/or long term, they should be provided with a portion of the income generated from the project on their land.
- e. The Private Housing Land Development Rules, 2004, should be amended to include the specific timeline for starting construction of building after allotment.

### **Recommendations to enhance institutional capacity**

2. To ensure transparency and accountability in RAJUK, a separate, unbiased, empowered, and free from influence authority should be established through proper reformation of law.
3. Financial manual should be developed mentioning the distribution of authority; policy should be developed for using vehicles in pool.
4. All the documents including the approved plans of RAJUK should be digitized and preserved; detailed guideline should be made mentioning the process of online application for land use clearance and approval of plan for building.
5. Review activities of the cabinet committee on DAP should be stopped; DAP should be finalized immediately after doing necessary revisions consistent with DMDDP with the recommendations from relevant experts.
6. Human resources should be recruited according to revised organogram based on current necessary needs; RAJUK's permanent employees should be promoted to higher positions on the basis of qualification and competence.

7. Along with the architectural plans, the structural plan, the fire safety plan and the utility-related plans of the building should be examined properly; if required RAJUK may recruit area based technical consultants for examining the documents.

#### **Recommendations to enhance transparency**

8. The RAJUK website should be made more informative with providing updated reports (such as audit report, budget, information related to plot allocation and compensation, criteria for determining quota etc.); the information of the website should be updated on a regular basis.

9. The citizen charter should be displayed along-with the amount of fees for the services.

#### **Recommendations to enhance accountability**

10. RAJUK should enhance monitoring on its services and related activities; strong monitoring system should be established to stop harassment by the brokers.

11. A separate cell of grievance redress should be established at the central level; to document all the complaints should be made mandatory; a hotline may be introduced to allow complaints.

12. The parliamentary standing committee on the Ministry of Housing and Public Works should be reconstituted to avoid conflict of interest and ensure accountability of RAJUK.

#### **Recommendations to enhance integrity**

13. RAJUK should take initiatives for proactive disclosures of the income related information of the employees and it should be updated regularly.

14. Effective measures should be taken to implement national integrity strategy; Punitive measures should be taken for those who are engaged with any kind of irregularities and corruption.

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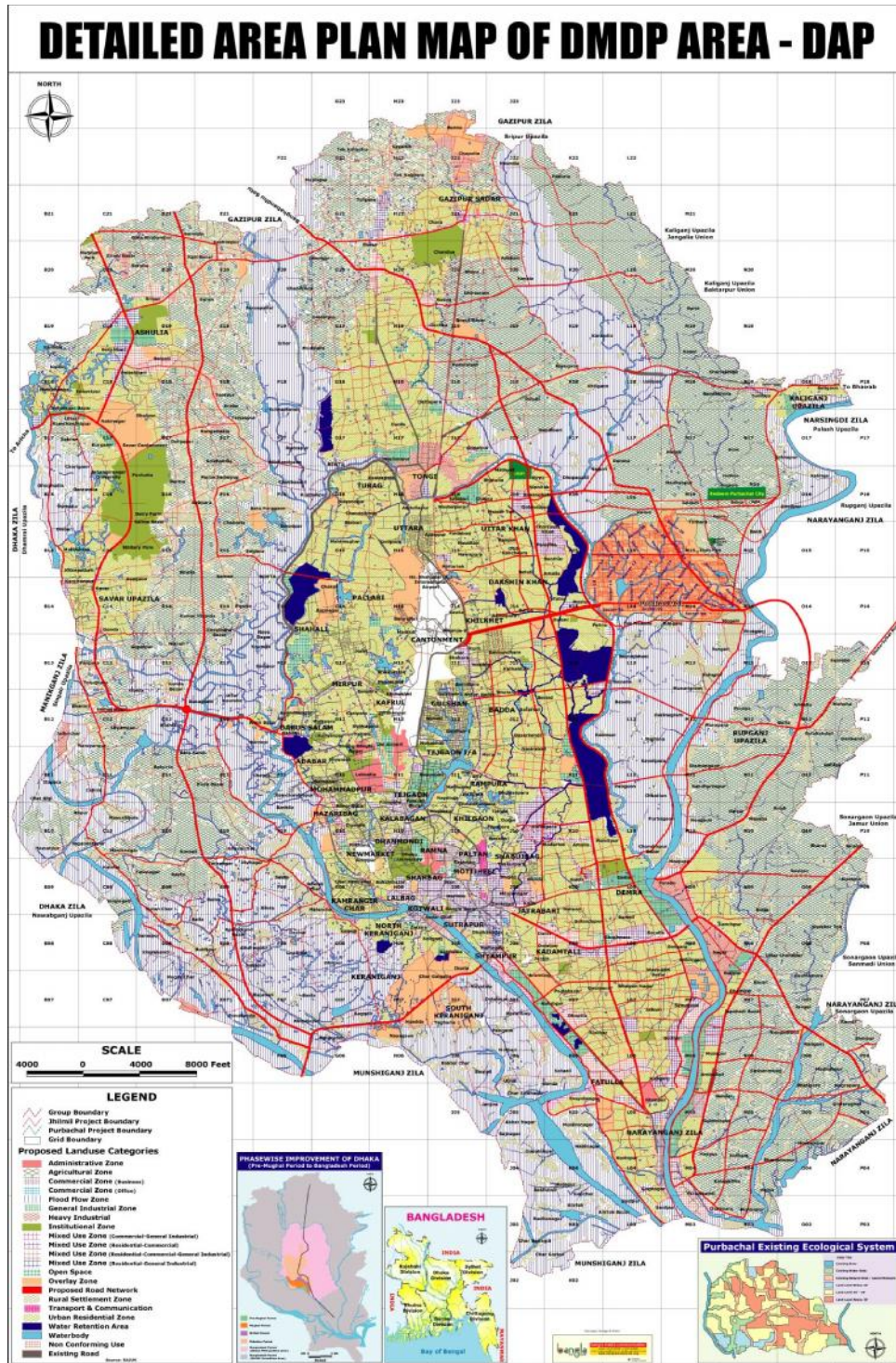
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## Annexures

### Annex 1: Detailed Area Plan Map



## Annex-2: Completed major projects after RAJUK's establishment

**Township Development/Housing Estate/Site & Services Projects:** Gulshan, Banani, Baridhara Residential Model Town, Uttara Residential Model Town (1st and 2nd phase), Nikunja-1& 2, Gandaria Rehabilitation Area, Karwan Bazar Rehabilitation Area, Shyampur Rehabilitation, Jurain Rehabilitation, Badda Rehabilitation, Dattapara Resettlement Area

**Industrial Estates:** Tongi, Shyampur Rehabilitation Area, Pastagola

**Commercial Projects:** Dilkusha, Karwan Bazar, Mohakhali, Banani, Gulshan Circle I and II, DIT/RAJUK Avenue, Nawab Siraj-ud-doulla Commercial Area (Narayangonj), Chashara, BoaTkhal and Khanpur Commercial Area (Narayangonj)

**Markets & Shopping Centres:** Nawab Yousuf market, Nawabpur, Shakura Market near Hotel Sheraton, Karwan Bazar, Gulshan I & II Circle, Steamer Ghat market, Narayangonj, Laksmi Bazar Market, Shopping Centre cum Market, Sector-6,Uttara

**Road Construction Projects:** DIT Avenue, Malibagh-Rampura Road, Moghbazar-Tejgaon Industrial Area Road, Dholai Khal Road, Mohakhali-Gulshan Road, Tejgaon-Gulshan Link Road, Pantha Path, Bijoy Sarani, Pragati Sarani, Gulshan (North-South)Avenue, Madani Avenue, Kamal Ataturk Avenue, Kabi Jashimuddin Avenue, Rabindra Swarani, Bangabandhu Road (Narayangonj), Nowab Salimullah Road (Narayangonj), Shahid Suhrawardi Road (Narayangonj), Nowab Siraj-ud-doulla Road (Narayangonj), Isha Khan Road (Narayangonj), Link Road from Gulshan(south) Round about to Progati Sarani

**Open Space/Park/Play Grounds:** Bahadur Shah Park (Victoria Park), Paltan Moidan, English Road Park, Armanitola Park,Nowab Siraj-ud-doulla Park, Gulshan (South)park, Gulshan(North) Park, Baridhara Central Park at Park Road, Park/Open Space/Play Ground at Sector-1,3,4,6,7,11,12,13 & 14 of Uttara

**Fountains:** At the Traingle of Minto-Bailey Road (Near Hotel Sheraton), Fountain at Sonargaon Crossing, Fountain in the north-west Corner of Bangabhaban

**Bridges & Culverts:** Boat Khal Bridge at Narayangonj, Rampura Bridge, Bridge in between sector 10 & 11 of Uttara, Box culverts over Banani-Gulshan-Baridhara and Uttara Lakes

**Buildings/ Apartments/Quarters:** Constructed 42 nos,4 storied Residential Quarters and allocated to the various organization, NAM Village & Villa Apartments (260 nos) at Gulshan & Banani

**Flyover:** Kuril

**Car Parking:** Multistoried Car Parking-cum-office Building at Gulshan-1