

Examining the Regulatory Consistency among the Physical Plan implementing Authorities: A case study on the Dhaka Metropolitan Development Plan

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Abstract

Regulatory consistency in the implementation of physical plans has yet to be explored in Bangladesh or elsewhere. This study represents a pioneering effort in this field, aiming to determine whether there is regulatory consistency among the authorities responsible for implementing physical plans in Bangladesh. Focusing on the Dhaka Metropolitan Development Plan (DMDP), the research adopts a qualitative approach, utilizing key informant interviews guided by a semi-structured questionnaire. The findings were analyzed through thematic and narrative analyses using NVivo 14 software. The study reveals significant issues regarding regulatory consistency between RAJUK and other plan implementing authorities within its jurisdiction. It identifies several challenges contributing to this inconsistency, including institutional incoherence, a lack of ownership, and unclear policies at the local level, among a total of twenty-one challenges identified. The research suggests three approaches to address this regulatory inconsistency, and all of them describe that to ensure regulatory consistency, local governments must follow the DMDP directives or create plans that align with them. The results of this study aim to enhance regulatory consistency among plan-implementing authorities in Bangladesh. Additionally, there is considerable potential for future research to validate these findings and explore them with quantitative data empirically.

Keywords: regulatory consistency, inconsistency, institutional incoherency, ownership, RAJUK.

Introduction

Consistency is widely acknowledged as a fundamental principle of effective regulatory frameworks; however, a universally accepted definition of regulatory consistency remains elusive (Breunig & Menezes, 2012). Regulatory consistency is usually a prerequisite for treating equitably (Breunig & Menezes, 2012), and consistent regulatory activity ensures that entities and organizations are treated fairly and equally (Etienne, 2015). Regulatory consistency is necessary in the decentralized institutional setting to implement any plan or program. The underlying reasons for the non-implementation of plans are often unclear. Plans or policies associated with any plan may not be utilized due to various economic and political factors (Laurian, et al., 2004). Given that regulatory consistency can impact the implementation of any plan (Carruthers, 2002a), it is essential

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to examine this consistency among the various authorities responsible for implementing these plans.

Literature on planning exhibits a striking absence of studies about the implementation of local comprehensive plans (Laurian et al., 2004; Talen, 1996), about the associations between plans and their results (Laurian et al., 2004; Knaap, Ding, & Hopkins et al., 2001), and about the reasons for disparity in plan implementation (Laurian et al., 2004). Regulatory consistency and even practical definitions of consistency are hard to find (Etienne, 2015). The majority of the literature on regulatory consistency focuses on testing for regulatory consistency within related organizations (Breunig & Menezes, 2012), as well as consistency in regulatory work, examining factors that may be considered when explaining (in)consistency (Etienne, 2015), among other topics. To contribute to the current literature, this study aims to determine the regulatory consistency among the physical plan implementing authorities, with a focus on the Dhaka Metropolitan Development Plan. No early studies have explored this field in Bangladesh or elsewhere, making it unique and groundbreaking. The study thereby contributes to the physical planning field by significantly advancing research on regulatory consistency in plan implementation.

Objectives and Methodology of the Study

The Rajdhani Unnayan Kartipakkha (RAJUK) has a vast area of 1528 sq. km (DAP, 2022-2035) with multiple local governments within its jurisdiction. Regulatory consistency is a must between RAJUK and these authorities to implement the plan prepared by RAJUK for its jurisdiction. The study outlines three objectives. First, it investigates the current condition of regulatory consistency within the existing framework. Second, it examines the challenges of maintaining regulatory consistency over time. Finally, the study identifies measures aimed at enhancing regulatory consistency between RAJUK and the relevant authorities.

The qualitative research method is used to identify the opinions of the key informants (Daniel & Harland, 2018; Andrew & Halcomb, 2007; Polit & Beck, 2006) regarding the condition and challenges of maintaining regulatory consistency and measures to achieve regulatory consistency between RAJUK and the physical plan implementing authorities. The qualitative data is collected using Key Informant Interviews (KIIs).

With the purposeful sampling technique (Saunders, Lewis & Thornhill, 2007), the study selects academicians, experts, and professionals from the research population who are acquainted with the burning debate of regulatory consistency between these authorities. Academicians, experts, professionals, researchers, students of the urban planning discipline, etc., who have first-hand knowledge about RAJUK and its activities are the research population. Thirteen (13) key informants (Daniel & Harland, 2018; Jeyaraj & Harland, 2014), academicians (e.g., teachers, scholars, and researchers in the urban planning field), experts (e.g., former practitioners in the DMDP Project and RAJUK), and professionals (e.g., current employees of RAJUK and the urban local governments within the DMDP area) are interviewed with a semi-structured questionnaire (Daniel & Harland, 2018) with both open-ended and closed-ended questions using both Face-to-

Face meetings and Zoom Meetings Platforms. The informants were identified as KII-1(A1), KII-2(A-2), KII-3(A-3), KII-4(E-1), KII-5(E-2), KII-6(E-3), KII-7(E-4), KII-8(E-5), KII-9(P-1), KII-10(P-2), KII-11(P-3), KII-12(P-4), and KII-13(P-5). Here, academicians, experts, and professionals are denoted as A, E, and P, respectively.

Questions were raised about the current state of regulatory consistency, the difficulties in maintaining this consistency between RAJUK and the authorities responsible for implementing physical plans, and what measures could be taken to achieve effective regulatory consistency between them.

The thematic analysis was conducted to achieve the results (Maguire & Delahunt, 2017; Braun & Clarke, 2006), complemented by narrative analysis using NVivo 14 software. Before starting the analysis, the researcher transcribed all interviews.

Literature Review

Scholarly articles on regulatory consistency in the functioning of the urban development authority in Bangladesh are not available. An attempt was made in this research to search for literature on different aspects of regulatory consistency such as regulatory consistency in physical plan implementation, condition of regulatory consistency among plan implementing bodies in or outside Bangladesh; regulatory consistency of DMDP within its jurisdiction; accessibility of DMDP or any physical plan within their jurisdiction; regulatory coherency in planning or especially in Bangladesh. Even very little literature is on the challenges of physical plan implementation.

Consistency is a common term for regulation, but its exact meaning can be elusive. It indicates that the application of the law should be similar or comparable for all (Etienne, 2015; Bingham, 2010). According to Etienne (2015), "Consistency in regulatory practice has a functional value. The successful rolling out of any regulatory strategy depends, in part, on its consistent delivery at the street level, across the territory on which the policy is meant to be implemented." It is a matter of 'principle and operational' effectiveness (Etienne, 2015).

Again, policy implementation challenges in a politically fragmented metropolitan area (Jain, Korzhenevych, & Pallagst, 2019). A strong institutional framework with vertical, horizontal, and internal consistency is needed (Jain et al., 2019; Weitz, 1999; Burby & May, 1997; Gale, 1992) to promote regulatory consistency and cooperation among the jurisdictions in a metropolitan area (Burby & May, 1997).

Regulatory Consistency in Implementing the DMDP Policies

Regulatory consistency is essential in a decentralized institutional setting to effectively implement any plan or program. Regulatory inconsistency was the major problem in institutional decentralization when implementing DMDP policies (Miti, 2024). Three Sub-themes were identified from the KIIs under the theme, 'Regulatory Consistency in Implementing the DMDP Policies' for achieving the specific objectives of this study. Presented in Table 1 are the sub-themes categorized by each objective, accompanied by their respective frequencies of occurrence and the number of informants involved.

Table 1: Sub-themes of Regulatory Consistency mentioned concerning the Number of Occurrence and Informants involved

Objective	Sub-theme Name	How many times it was mentioned (across all interviews)	How many informants mentioned it
Objective 1	Condition of Regulatory Consistency	13	13
Objective 2	Challenges of Maintaining Regulatory Consistency	96	13
Objective 3	Measures Achieving Regulatory Consistency	29	12

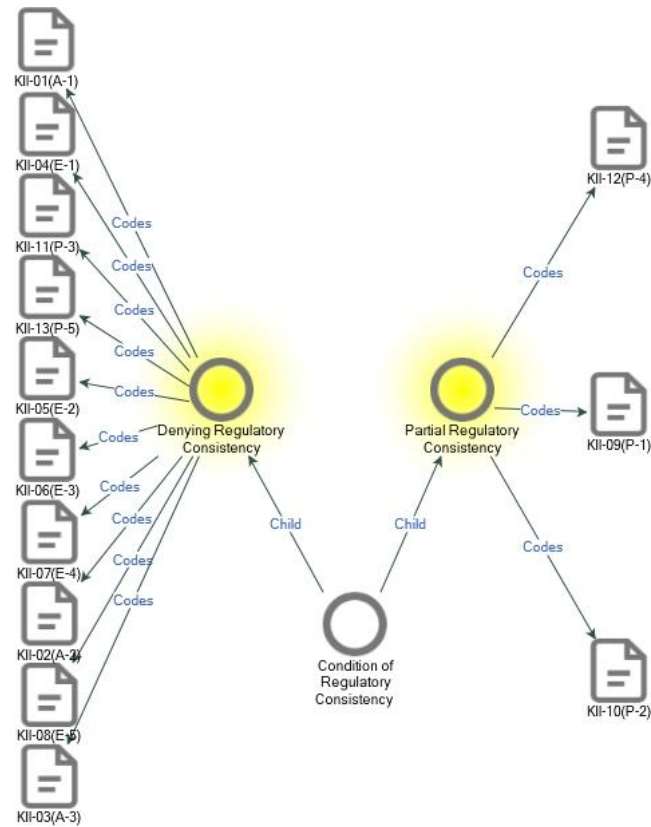
Source: KIIs, Prepared by Author, 2023

These three sub-themes are discussed below under three headings.

Condition of Regulatory Consistency

Regulatory consistency among related authorities is crucial for implementing any plan within a specific area. Figure 1 illustrates a comparison diagram of informants regarding their positions on the regulatory consistency between RAJUK and local governments within its jurisdiction. To address the question of whether local governments adhere to the DMDP policies for local development, it was found that ten (10) informants reported a lack of regulatory consistency between RAJUK and the local governments. On the other hand, only three (03) informants argued for partial consistency. However, no informant provided an affirmative answer to the overall regulatory consistency among the authorities (Fig. 1). One of the informants provided an important example of why the local governments did not adopt the DMDP policies:

*“No, the local governments were not supportive of implementing the DMDP Policies within their locality (i.e., local development according to the DMDP Policies). Instead, they questioned why those plans were created in that manner. I want to share an incident with you. Maybe in Satarkul Union or the other one, I went to that union for **. They directly asked us why we marked these areas as flood flow zones. They cannot sell their land because of it. What kinds of incentives would we offer them for this? Alternatively, are we going to compensate them for their loss?”*



Source: KIIs, Prepared by Author, 2023

Fig. 1: Comparison Diagram of the Condition of Regulatory Consistency

The plan, however, lacked specific details regarding compensation and the associated processes. Additionally, local governments were unable to implement the policies outlined in the DMDP due to the absence of clear guidance on how to do so. This lack of a framework to achieve these policies has been identified as a challenge in maintaining regulatory consistency.

During a discussion on the regulatory consistency between RAJUK and local governments in implementing the DMDP, one informant raised questions that highlight a reluctance to adhere to any plan in Bangladesh-

"..... the zonal direction mentioned in the DAP (Detailed Area Plan), were these directions implemented anywhere in Dhaka? Is there any plan that has been implemented perfectly in Bangladesh?"

Challenges of Maintaining Regulatory Consistency

The informants discussed why local governments do not follow DMDP policies when discussing the accessibility of these policies at the local level. Twenty-one (21) reasons were identified for not following DMDP from the KIIs. These reasons were the challenges

of maintaining regulatory consistency among the related authorities to implement the DMDP policies. Among these twenty-one challenges, 'Prevailing Institutional Incoherency' was mentioned more often than others, both in terms of how frequently it was mentioned and the number of informants mentioning it. The second most common was 'Lack of Ownership' in terms of the number of informants, and 'Incomprehensible Policies at Local Level' in terms of how often it was mentioned. Figure 2 illustrates a sunburst diagram that highlights the most frequent challenges based on the number of informants and occurrences mentioned in the KIIs.

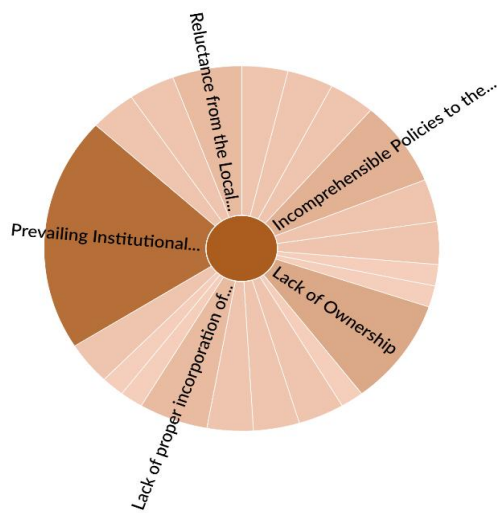


Fig. a: Hierarchy Chart compared by number of items coded (Informant)



Fig. b: Hierarchy Chart compared by number of coding references

Source: KIIs, Prepared by Author, 2023

Fig. 2: Sunburst Diagram of Challenges of Maintaining Regulatory Consistency identified from KIIs

In terms of the highest number of informants addressing specific issues, five (05) key challenges are identified (prevailing institutional incoherency, lack of ownership, incomprehensible policies at the local level, reluctance from the local governments, and lack of proper incorporation of local governments) (Fig. a). Additionally, seven (07) other challenges are noted in terms of the highest number of the frequency of occurrence (institutional incoherency, incomprehensible policies at the local level, lack of ownership, lack of proper incorporation of local government, feelings of supremacy, issues with public perception, and lack of initiatives from RAJUK) (Fig. b). These challenges are illustrated in a sunburst diagram (Figure 2). Below, all twenty-one challenges are detailed in order from most to least mentioned based on the number of informants addressing the particular issue.

Prevailing Institutional Incoherency

This is the most significant challenge in maintaining regulatory consistency underscored by both the informant number (11 out of 13) and occurrence frequency (21). The causes of

institutional incoherence between RAJUK and the local governments are: the lack of collaboration, ministerial differences, and being separate entities. One informant argued that if RAJUK does not integrate local governments in plan preparation, these local governments would not feel compelled to follow it. According to this informant,

“Each local government has mayors and councillors to establish roads, drainage, bazaar, graveyard, etc. within their jurisdiction. While doing so, they do not search for consistency with the DMDP. They will not search for such consistency if RAJUK does not incorporate these local governments with the DMDP. RAJUK can incorporate these local governments in plan preparation.”

Another informant expressed the same fact,

“Local authorities may engage in activities that address their specific local needs, which may inadvertently align with the proposals outlined in the DMDP. However, it should be noted that this alignment is not indicative of a proactive consideration of the DMDP by local authorities; rather, it reflects a lack of capacity on their part to implement these proposals effectively. Furthermore, the RAJUK has failed to adopt an integrated approach, such as an action plan or growth development plan, in collaboration with local bodies.”

This lack of coordination diminishes the potential for coherent urban development that aligns with the DMD. Both of the informants blamed the lack of institutional coherence for local governments not implementing the DMDP. Since there was no coherence, KIIs revealed that local governments issued building permissions, which they were not authorized to do under the TI Act, 1953, as that responsibility had been held by the chairman of RAJUK until 2014. Local governments do not have any authorized offices to perform such tasks.

A real-life example of such a situation was observed in Savar Municipality. Following the Rana Plaza incident in Savar, the plan permission authority of Savar Municipality was removed; however, the cancellation of this building permit was revoked by the Secretary in charge of the Local Government Department in 2015. According to one of the informants, the outcomes of such a meeting could not alter any law,

“One cannot cancel any government gazette notification through a departmental meeting. There is a hierarchy in establishing and revoking rules and regulations. However, if any municipality issues building approval based on a decision made in such a meeting, those permits are not lawful.”

Another informant explained this same point differently in favor of the local authorities. As the cancellation of permission is revoked, they argue that the local bodies can carry out the plan approval responsibility in accordance with the Local Government Act. According to them,

“The CC (City Corporation) Act is a rule or law. Do you know where the contradiction was? CC Act is a law, but a gazette is not. There is a difference between an act and a gazette. An act is the primary legislation, while a gazette is a publication that may be issued based on the act. The DMDP was published in the gazette, but it is not an act. The CC Act states that the CC can prepare its own master plan.”

In 2014, an amendment was introduced to the ‘Rules of Business’⁴ for local bodies, which established a new clause specifying their role. The clause stated that the local governments have the authority for the “*Preparation, approval and notification in official gazette of Master Plan of Upazila, Paurashava and City Corporation areas except cities where government has established development authorities by gazette notification*” (Rules of Business, 2014). That is, the plan preparation and approval authority of any local bodies within the jurisdiction of any development authority is exempt from 2014 with this amendment. The stated case of Savar Municipality was in 2015, one year after the amendment to the Rules of Business. It appears that local government bodies either lack awareness of the stipulations set forth in the Rules of Business or exhibit reluctance to adhere to this rule. Such behavior raises important concerns regarding the governance and functional obligations of local bodies. This disconnect between intended regulatory frameworks and on-the-ground practices often results in inefficiencies and confusion within the building approval process in Bangladesh. An informant noted that the ultimate consequence of this inter-institutional incoherence is borne by the general populace, who frequently find themselves victimized by procedural delays and oversight.

When asked about the basis for conducting physical development activities instead of adhering to DMDP policies, one informant revealed that local governments carried out these activities on public demand and local need. Another added that these developments are carried out at the neighborhood level. The third informant expressed the same view,

“Local governments take their infrastructure development projects based on local demand, pressure from the powerful, and their assessment of need.”

One informant noted that local governments are not mandated by their ministry to adhere to the DMDP. As separate entities with distinct mandates, this disconnect significantly contributes to the lack of compliance with the plan developed by RAJUK. Informants highlighted the absence of collaboration between these two different types of organizations as a key issue. KII findings indicated a lack of inter-ministerial collaboration and insufficient cooperation among the plan-implementing authorities, which led to the DMDP policies not being effectively implemented. One of the informants added,

“... there is a culture within the administration that one ministry does not follow the directions of another ministry unless it is agreed upon at the highest level, and no attempt was made to establish any such agreement due to the lack of sincerity in the plan-making bodies.”

Lack of Ownership

Lack of ownership refers to the fact that local governments do not have a sense of ownership of the DMDP. Five (05) informants mentioned this challenge 10 times. According to the KIIs, this absence of ownership hampered the proper implementation of the DMDP. Highlighting this issue, one of the informants pinpointed the reason as-

“They are not even connected with the DMDP. How can they possess it? They did not own it because they never believed the DMDP was their document and that they could take anything from it.”

⁴ Rules of all works done by the Government of Bangladesh

It was also discovered that lack of ownership of the plan extends beyond just local governments; ministries, policymakers, and even the central government fail to take ownership as well. RAJUK, as the authority responsible for preparing the DMDP, also does not embrace the plan. According to one informant, this lack of ownership stems from the absence of a shared goal among all stakeholders involved in the DMDP. They further blamed the perception of local governments about the Plan and claimed,

“The local bodies believe that RAJUK prepared the plan without consulting them. They think a plan has been imposed on them, and they do not want to support the plan in any way. This causes serious problems at the grassroots level due to their lack of ownership of the plan.”

However, one of the informants pointed out that once RAJUK has approved the plan after a public hearing, it is not solely responsibility of RAJUK but also the duty of all plan implementing agencies to adhere to the plan.

Incomprehensible Policies at the Local Level

Four (04) informants raised this challenge a total of thirteen (13) times during the KIIs. They highlighted that the DMDP lacks a detailing, which is essential for effective execution at the micro level. Furthermore, even the final tier of the DMDP, the DAPs, does not include this crucial level of detail.

The proposals outlined in the DMDP require a more thorough breakdown and detailing to facilitate the effective development and implementation of action plans. The DAP (2010-2015) highlighted the necessity for a comprehensive study that would clarify the implementation process. One informant emphasized this need for specificity by illustrating it with a pertinent example,

“Say, in the first DAP, it states that three parks were needed for old Dhaka. However, it does not specify where these parks would be established, who owns the land, which lands were chosen, how much land would be allocated, or the catchment areas. Since the old DAP lacked these details, implementing such proposals would not have been possible.”

One informant argued that policy issues are a higher-level concern. If this policy is not presented to local governments in a tangible form, such as a project or an action plan, they cannot accept or reject it. As the final tier in implementing the plan, local government bodies have traditionally focused on implementation-oriented activities. The informant highlighted,

“One issue is how much these policy directives serve as decision-support tools for the local government body. This should be considered. If there is no alignment between the level of the plan prepared by RAJUK and the scale or level needed for the local government, how can these local government bodies approve or reject it? How would that plan be effective for the local bodies? Do these policy directives reach them in a way that the local government body can understand? The policy directives come to local government bodies on such a scale that it is questionable whether they can implement them or even comprehend them.”

Lack of Proper Incorporation of Local Governments

While preparing the DMDP, local governments were not properly included. Three (03) informants pointed out this fact. One informant said,

"Since this plan (the DMDP) did not incorporate our opinion or requirements, we definitely need a separate master plan for our municipality. For example, where should we set up our primary or secondary dumping station? There is no indication of such in that plan."

One of the informants, who is an official within a local government authority, expressed concerns regarding the level of participation that local governments had in the preparation of the DMDP. They emphasized that the involvement was not adequate. Another informant acknowledged this issue and shed light on the behind-the-scenes processes involved in the preparation of the DMDP,

"They were called and informed that RAJUK wanted to do this, that, and the other. Local governments believed RAJUK would carry out those actions. However, RAJUK neither took the required time to prepare the plan nor visited each local government individually. What they are telling you is correct. RAJUK protected itself by obtaining their signatures."

According to another informant, there was insufficient communication between RAJUK and local governments, both during the preparation of the DMDP and throughout the implementation period. In their language,

"Honestly speaking, the public representatives are informed by letter and told to arrange a meeting where a representative from RAJUK will show them the plan. Those public representatives usually call the people close to them at those meetings."

The informant highlighted that the general public is consistently left out of the mentioned process. They pointed out a significant barrier, stating that RAJUK failed to engage directly with the general populace and instead relied on representatives of the democratic process, viewing them as the legitimate representatives of the area. Another informant claimed,

"They (RAJUK) lack the authority and communication with the people. If you do not have communication with the people, how can you carry out planning activities?"

Reluctance from Local Governments

Three (03) informants identified the reluctance from local governments as a barrier to the implementation of the DMDP policies. However, one of them argued that it is the upper-level authorities, rather than the local governments themselves, that fail to initiate guidance for local bodies in adhering to the DMDP. The informant stated,

"Local bodies should not be burdened with the complexities of adhering to the DMDP, as their controlling authorities do not require or prompt them to do so. Their guardians do not search for such queries about the plan. There is nothing to do for local bodies individually. They are simply following directions from higher authorities, implementing commands that dictate their yearly tasks. Currently, numerous agreements and contracts have been established. Back then, there were none. How can you find faults with local bodies in this matter?"

Feeling of Supremacy

Two (02) informants discussed the attitude of RAJUK and local governments towards each other. Both authorities sought to exercise power independently, particularly concerning financial authority, which they often felt compelled to demonstrate to each other. The various organizations operating within the same territory, such as CCs, municipalities, WASA, DESA, and DESCO, all perform their work under the supervision of their respective line ministries. This tendency is the reason for avoiding the power distribution leading to 'piecemeal developments' within the DMDP area. One informant argued,

"To begin with, there is a lack of cooperation regarding power distribution; both the municipalities and RAJUK fail to respect each other's authority and are unwilling to share power. Nobody, neither RAJUK nor the local governments are prepared to relinquish their financial authority to other entities. Each party is focused on advancing projects that primarily benefit themselves."

Problems in People's Perception

Two (02) informants indicated that public perception regarding adherence to plans in Bangladesh is largely unfavorable. This lack of interest stems from a significant knowledge gap among the population regarding those plans. Consequently, this lack of understanding ultimately contributes to a diminished interest in following the proposed initiatives. According to one informant,

"Implementing any plan can be quite challenging. Many individuals are often unaware of the importance of planning and the potential benefits it provides. This lack of awareness contributes to the difficulties encountered during the implementation process."

Emphasizing the same fact, the other informant added,

"In our cultural context, land use regulations are not systematically enforced. There exists a lack of strict guidelines governing land development activities. A considerable proportion of individuals engage in purchasing low-lying land and subsequently construct residential buildings, contributing to the growth of the housing estate sector. However, many of these individuals often do not seek the necessary permissions from the relevant authorities."

The informant posed an intriguing question about whether the government has the capacity to shift the mindset of its citizens. As noted by the informant, individuals are generally aware of the necessity to follow building regulations and land use laws when constructing homes. However, the reality is that adhering to these laws often restricts their options, such as purchasing land in more desirable low-lying areas or building larger homes. Faced with these constraints, many individuals may choose to circumvent the law rather than comply with it.

Lack of Initiatives from RAJUK

Two (02) informants highlighted the absence of RAJUK initiatives as a challenge to maintaining regulatory consistency. They noted that RAJUK had not made sufficient efforts to adhere to the DMDP policies for the development within the designated areas. One informant provided a specific example of this oversight,

“The identified retention ponds in the DMDP were encroached upon. RAJUK was unable to even perform this function. Those water bodies were large and visible from a distance. However, they still could not save them.”

The other informant argued that the head of RAJUK, who holds comparatively less power than many other heads of the related authorities and is not particularly technical, seems to lack a strong interest in planning issues. Instead, his focus appears to be on specific developments and the issuance of building permits.

Disoriented Role of the Government

Two (02) informants highlighted the perplexing role of the government as a significant challenge in maintaining regulatory consistency. They noted a lack of coherence in the building approval process across various institutions in Bangladesh. The absence of inter-institutional coordination was emphasized, with one informant asserting that the government is aware of this inconsistency yet has not taken action to address it. This informant also raised concerns regarding the preparation of master plans by different organizations and authorities. Entities such as the (Urban Development Directorate (UDD), Local Government Engineering Department (LGED), RAJUK, and municipal bodies, all government agencies with specific mandates, are each developing master plans for designated areas within their jurisdictions, leading to conflicting interests. Despite awareness of this issue, the government has yet to find a resolution. The other informant echoed similar sentiments,

“Not only smaller entities like municipalities or the CCs, but also larger organizations such as LGED, despite not being mandated to create plans, have developed numerous plans for various areas, but could not bring them to light. Bangladesh is such a country where anyone can do anything they wish.”

Inconsistency in Budget Allocation

There is a noticeable inconsistency in budget allocation for local governments in Bangladesh, as identified by two (02) informants. They pointed out that local governments have historically lacked the authority to influence the budget amounts provided to them by their respective ministries. This inconsistency poses a significant challenge to effective plan implementation. One informant highlighted,

“... some budgets are allocated through the LGED, while others come directly from municipalities, zila, or upazila authorities, and some are collected by local MPs (Members of Parliament). The local MPs receive a significant allocation, which they can use at their preference to construct roads or other infrastructure. This can sometimes align with RAJUK’s plans, but at other times, their priorities may contradict those plans. This is our main challenge.”

Acceptability of the DMDP

According to two (02) informants, the acceptability of the DMDP among local governments presents a challenge. The policies associated with the DMDP were not widely accepted, and no authority consistently adhered to them. One informant suggested that if any authority did comply, it might be due to external pressures influencing the implementation of the policy. Conversely, the other informant highlighted a different aspect of the lack of acceptance of DMDP, pointing to errors in

land use identification within the DAP, which is the final tier of the DMDP. They noted that in situations like those mentioned below, adherence to the plan was not feasible.

“Maintaining regulatory consistency is dependent upon specific circumstances. Notably, discrepancies have been observed within the DAP. For instance, the educational institution known as Rani Bilash, located within the GCC (Gazipur City Corporation), has been erroneously classified as a pond in the DAP.”

Knowledge Gaps about the DMDP

Two (02) informants reported that local governments appear to be unaware of the propositions outlined in DMDP policies. To emphasize this issue, one of them stated,

“Not most of them, 100% of them do not know what is inside that DMDP.”

Lack of Capacity of Local Governments

The limited capacity of local governments to comprehend the DMDP policies has been highlighted as a challenge by two (02) informants. It was previously mentioned in this subsection under the heading ‘Incomprehensible Policies at the Local Level’ that the DMDP lacks clarity, making it challenging for local governments to fully grasp its content. One informant noted that local authorities, such as the union parishad, struggle to understand the DMDP policies. In a similar tone, the other informant raised several questions regarding this issue.

“Who is responsible for adhering to the policies set forth by local government? It is the professionals who are tasked with this duty. Policymakers develop these policies, and local governments must comply with them. To what extent can a local government effectively understand and follow these policies?”

According to the KIIs, the majority of local governing bodies lack both the requisite technical expertise and the personnel necessary to effectively comprehend and implement the policy directives by the DMDP.

Posts of the Top-level Personnel

Two (02) informants reported that the leadership of RAJUK (board members and chairman), as well as local government representatives, are not permanent positions. These individuals undergo changes after a certain period, which hinders the effective implementation of the DMDP. As these ministers, secretaries, or chairmen change, a new one comes to their posts. One representative may participate in one meeting but cannot be present for subsequent ones, requiring the new representative to restart the process from the beginning. This cyclical situation was highlighted in the KIIs. One informant remarked,

“During the plan preparation (of DMDP), representatives from the Ministry of Local Government were invited to participate, but those positions are not permanent. One representative might attend the meeting, but he/she might not be there anymore. They are not permanent on that post.”

This challenge, categorized under the heading ‘Posts of the Top-level Personnel’, is intrinsically connected to the issue of ‘Lack in the Democratic System’, particularly concerning the preservation of regulatory consistency. The latter topic is elaborated upon in the following sections.

RAJUK's Self-violation of the DMDP

According to two (02) informants, RAJUK itself did not adhere to the guidelines outlined in the DMDP. The DMDP specified that the plan should be reviewed; however, RAJUK failed to carry out this requirement. Despite being designed for a 20-year timeframe, the plan remained in effect until 2022, when the new DAP (2022-2035) was officially gazetted.

The DMDP indicated that the DAP should be developed for a specific locality where it was required, rather than for the entire RAJUK area. However, the DAP was ultimately created for the whole RAJUK area. One informant elaborated on the rationale behind this deviation and explained,

"It (DAP) was primarily necessitated by the complexities associated with land use zoning. During the formulation of the DAP, various plans were presented for approval from areas such as Gazipur and other adjacent areas. Now, the question arose of how we would permit the land use of that plan. Because there were no identified land uses for those areas. This is the reason behind preparing the DAP for the entire RAJUK area. I felt that a generalized land use strategy for the entire area could suffice. There was no need to prepare a detailed development infrastructure plan."

Lack of Mechanism for Regulatory Consistency

Two (02) informants identified the absence of a communication mechanism between RAJUK and local government entities as a significant challenge in ensuring regulatory consistency. One informant emphasized the necessity for a coordination committee to facilitate more effective collaboration and overcome this communication barrier. They claimed,

"A committee should have been established under the leadership of RAJUK to enhance coordination among the various stakeholders. But, in the DMDP, no such precise arrangement was addressed."

The project aimed at the preparation of the DMDP highlighted potential institutional limitations that RAJUK should address to ensure effective implementation of the plan (DMDP Structure Plan, 1995-2015, p. 31). However, it appears that RAJUK has not adequately resolved these identified issues.

Lack in the Democratic System

Only one (01) informant mentioned the democratic system of Bangladesh as a challenge. According to this informant, in a democratic country, the government changes every five years. When a new government takes office, the newly elected representatives often do not feel accountable for the decisions made by their predecessors. Mentioning this fact as a problem, the informant added,

"At the grassroots level, the democratic divisions can pose a significant danger. So, when someone approves a plan, after five years, the new representatives do not adhere to that plan anymore."

This phenomenon raises concerns regarding the stability and consistency of democratic processes and highlights the challenges associated with long-term planning in a dynamic political environment.

Malfeasance in RAJUK and Local Governments

According to one (01) informant, regulatory consistency has been adversely affected by instances of exploitation and corruption within the plan implementation process. Both RAJUK and local governments are accused for such malfeasance. The informant illustrated this malfeasance with a pertinent example highlighting how it occurs,

“.....an upazila wants to construct a road. Through various means, such as pursuing leaders or others, bribing a good amount of money, etc., it manages to secure a road construction project. In reality, the length of the road, say, is 10 km. They somehow construct the road up to 2 km, and the remaining funds are siphoned off into private pockets”

The informant added that this challenge of plan implementation is intrinsically linked to the accountability of the relevant entities.

Lack of Accountability

One (01) informant highlighted the issue of accountability, noting the malfeasance in RAJUK and local governments in the preceding heading. They asserted that the policies of the DMDP have never been executed effectively due to this lack of accountability. The informant placed the blame on the higher-level authorities, expressing that this oversight is a significant factor in the failure of proper implementation of the DMDP. They described,

“The accountability of an Upazila is entirely internal, as there is no external supervision to monitor the construction activities, whether they are following the directions. No higher authority, such as the CC or other regulatory bodies, verifies its (Upazila’s) work. A similar situation occurs within the municipalities.”

Lack of Scrutiny

The absence of scrutiny in various development activities was highlighted by a single informant. Projects with an allocation of 50 lacs or more are reviewed by the Planning Commission, which is able to effectively assess these projects to ensure compliance with the DMDP. However, the informant noted that those projects that do not pass through the Planning Commission pose a challenge for scrutiny. They added,

“Projects valued at 5 lakh or less do not undergo this screening process, allowing related agencies or local bodies to manage them independently. Consequently, these projects are not evaluated to determine their compliance with the DMDP. If a project requires land acquisition, the responsible organization seek clearance from RAJUK. RAJUK then assesses the project in accordance with the DMDP and informs the organization whether the project can proceed. However, if a project does not require land acquisition, for example, when residents provide land from their plots to construct a road, RAJUK is unable to review such developments.”

Lack of Sequential Implementation of the DMDP

According to one (01) informant, there was a lack of sequential implementation of the DMDP. The informant claimed,

“They (local bodies) were required to implement the DMDP policies within their jurisdictions, but instead, they bypassed this step and directly engaged with the

DAP. The SPZ⁵ will direct the activities, and the DAP will make it happen by taking on projects. Different agencies will collaborate with the DAP. It would be misguided to proceed directly with the DAP; we must first adhere to the SPZ (from UAP⁶) and then utilize the DAP for further details. Local governments are obligated to follow the directions of the DMDP, as they operate within its jurisdiction and must comply with the law."

This statement is inconsistent with the DMDP itself. The DAPs were formulated in accordance with the Structure Plan (SP) policies and directions outlined in the UAP. Therefore, the micro-level of this plan implementation can follow its respective DAP to direct its development. When this micro-level adheres to the DAP, it ultimately complies with the action proposals of the UAP and the policies of the SP.

Measures Achieving Regulatory Consistency

Out of thirteen (13) informants interviewed, twelve (12) provided insights regarding measures to achieve regulatory consistency among the physical plan implementing authorities within a jurisdiction, which are grouped under three headings, namely:

1. Through action-oriented Plans
2. Not through separate Master Plans and
3. Through separate Master Plans

Through an Action-oriented Plan

Nine (09) informants highlighted, across sixteen (16) distinct instances, that the attainment of regulatory consistency in the implementation of the DMDP could have been enhanced through the formulation of action-oriented plans by local governments. Honoring the current system, one informant mentioned,

"If I honor the current system, they do not need any master plan. However, they do need an action plan for their specific areas, adhering closely to the strategies and recommendations outlined in the DMDP."

KIIs revealed that urban areas lack the necessary details in the DMDP to carry out development activities effectively; what they require is an urban area plan. Regardless of the name it is given, such a plan is essential for urban areas. Importantly, this urban area plan must not conflict with existing plans within the same jurisdiction, that is, with the DMDP. Urban bodies, including CCs and municipalities, have the opportunity to develop their plans in alignment with the guidelines set forth by RAJUK. According to one informant,

"It is not a major concern if any local government within the jurisdiction of a development authority is unable to create its own master plan. While they may not be able to label it as a 'Master Plan,' they can still develop it under the titles of 'Action Area Plan' or 'Urban Area Plan'."

⁵ SPZ- Special Planning Zone

⁶ UAP- Urban Area Plan

In reality, SP (of the DMDP) does not offer a comprehensive plot-by-plot land use provision for its jurisdiction; instead, it provides general policies. This created the necessity for DAPs. However, the DAPs developed under the DMDP were prepared by RAJUK. One informant noted that the DAPs should have been crafted by local authorities in accordance with the guidance provided by the SP. Additionally, another informant emphasized,

“The DAP is essential, but it should not be prepared by RAJUK. When individuals submit applications, they cannot do that with reference to the structured plan, correct? They are applying for their specific plots. Therefore, it is crucial for local authorities to develop this plan. What will they base it on? It should be based on the higher-level directives, for instance, rail lines should pass through this area; this area will have specific uses; for this population size, there should be a corresponding number of schools, etc. Local authorities will then align activities accordingly. This plan should be created by local bodies with input from the community, allowing local residents to hold the authorities accountable for adhering to it.”

Conversely, one informant presented a case that exposes the challenges associated with formulating an action plan for a pre-existing township,

“For instance, our wards 1, 2, 3, and 4 have already been built up, leaving no available space to establish a secondary dumping station in those areas. How can we formulate an action plan for such scenarios when a town is already developed? Given the constraints, we cannot expand a 12-foot-wide road to 20 feet, nor can we widen a 10-foot-wide road to 12 feet. It is essential to consider the impact of heavy vehicles during drainage construction, especially since road widening is not possible. If we cannot find any place to put a dustbin, where can we locate a dumping station? We have faced the challenge of not finding suitable space, and acquiring land would likely necessitate the demolition of existing homes, which is a significant hurdle. If these concerns are not proactively addressed, we will encounter greater difficulties down the line. The plan (DMDP) should have accounted for these issues, but unfortunately, we overlooked them.”

Not Through Separate Master Plan

A total of seven (07) informants articulated the perspective that local governments should refrain from developing separate master plans and instead adhere to the existing master plan for their respective areas. Their consensus highlights a concern regarding the potential for regulatory inconsistencies that could arise from the implementation of independent master plans. One informant succinctly summarized this viewpoint, emphasizing the importance of alignment with established planning frameworks,

“No, a master plan is not necessary. This response pertains to the current situation. Based on how RAJUK has developed the land use plan, I am 100% confident that if local governments attempt to create their plans in alignment with RAJUK’s, there will inevitably be conflicts between the two.”

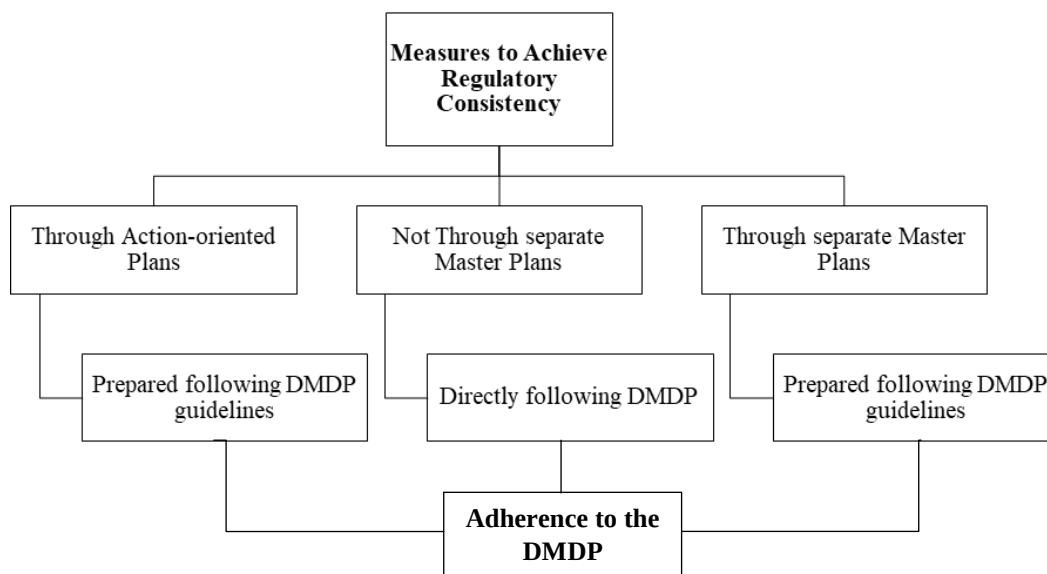
Through a Separate Master Plan

Based on insights gathered from four (04) informants, it is suggested that regulatory consistency may be attained through the implementation of distinct master plans,

provided that these plans adhere to the directives established by the DMDP policy. One informant further elaborated on this perspective, emphasizing the importance of compliance with these regulatory frameworks,

“Any local government interested in preparing a Master Plan may do so in accordance with the Local Government Act. However, as an expert, I would advise against it. If they choose to proceed, I recommend adhering to the DMDP guidelines, which take into account a broader, regional perspective. Following these guidelines can ensure that the area is well-integrated and harmoniously connected with its surrounding regions.”

Figure 3 illustrates the measures that could be implemented to attain regulatory consistency within the DMDP area.



Source: KIIs, Prepared by Author, 2023

Fig. 3: Measure to achieve Regulatory Consistency

The figure above clearly indicates that, in order to uphold regulatory consistency, local governments must adhere to the directives outlined in the DMDP or implement plans developed in alignment with those directives. This alignment is essential to ensure regulatory consistency and to promote effective governance within the planning processes.

Major Findings and Discussion

Government institutions impact regulatory consistency significantly across metropolitan regions (Carruthers, 2009a; Burby & May, 1997; Lewis, 1996). This study found that, due to the prevailing institutional setup, regulatory consistency was lacking when implementing the DMDP policies. Although a key factor in policy implementation is closely linked to how a policy is conceptualized and developed, among the various

elements that contribute to successful policy implementation, statutory coherence remains a vital component (Meier & McFarlane, 1995). Consistency in planning plays an important role in executing regional development activities aimed at enhancing the welfare of local communities, but in practice, several factors can hinder the alignment of planning efforts between central and local activities (Wahyudi, Fahmid, Salman, & Suhab, 2022). The determination of consistency ultimately rests with individuals who possess the requisite decision-making authority (Ohm, 2021).

The study identified twenty-one challenges of maintaining regulatory consistency for RAJUK that impede effective urban planning in Dhaka, Bangladesh. These challenges are grouped into four coherent thematic categories based on their related concepts to facilitate a structured understanding: 1) Institutional and governance challenges (prevailing institutional incoherency, disoriented role of the government, lack in the democratic system, posts of the top-level personnel, reluctance from local governments, lack of proper incorporation of local governments, lack of capacity of local governments, inconsistency in budget allocation); 2) Accountability, transparency, and ownership issues (lack of ownership, lack of accountability, lack of scrutiny, malfeasance in RAJUK and local governments); 3) Policy and regulatory issues (incomprehensible policies at local level, lack of mechanism for regulatory consistency, RAJUK's self-violation of the DMDP, lack of sequential implementation of the DMDP, lack of initiatives from RAJUK); 4) Awareness, perception, and acceptance problems (problems in people's perception, knowledge gaps about the DMDP, acceptability of the DMDP, feeling of supremacy). Each group reveals critical insights into the complex dynamics at play in urban planning processes, particularly in the implementation of the DMDP.

As 'Institutional and Governance Challenges', *institutional incoherence* emerges as a dominant theme. Incoherence represents one of the most challenging coordination issues (Peters, 1998). The successful implementation of policies is significantly influenced by the interactions among the associated organizations (Panday & Jamil, 2011; Panday, 2007). This interplay is critical in determining the effectiveness and efficiency of policy outcomes, as collaborative efforts and communication between entities contribute to a more cohesive execution of policy initiatives. However, coordination embodies a fundamental challenge within the realms of public administration and policy formulation (Peters, 2018). The complexities involved in coordination during policy implementation arise from several critical factors, including the absence of established rules and regulations, difficulties in financial management, the dynamics of central-local relations, and the varied operational modalities and accountability frameworks (Panday & Jamil, 2011). Addressing these multifaceted challenges requires a nuanced understanding of the interplay among these elements to promote more effective policy execution. On the contrary, insufficient coordination can result in a lack of coherence in policy formulation and implementation (Dombrowsky et al, 2022). This often results in a duplication of activities and inefficiencies within the various organizations involved (Panday & Jamil, 2011; Khan, 1997). However, coherence is essential for integrating governance and is likely to enhance sustainability by improving coordination efficiency (Bolognesi & Pflieger, 2019). It involves the consistent integration of various subsystems, components, or elements within institutions (Holst, 2023; Giesenbauer & Müller-Christ, 2020). Whereas, institutional incoherence is characterized by fragmented mandates and overlapping responsibilities among key plan

implementing authorities such as RAJUK, CCs, municipalities, etc. This fragmentation leads to administrative confusion and delays, hindering cohesive urban development. This scenario underscores the critical need for a thorough understanding and implementation of the 'Rules of Business' to ensure that local government bodies can fulfil their designated roles effectively and transparently. Again, the *role of government in urban planning* is disoriented, which tampers with accountability and fosters inefficiency among related personnel and plan-implementing authorities. There is a lack of inter-institutional coordination, which worsens the situation. The Planning Commission has the authority to intervene in this matter according to its 'Rules of Business'. Specifically, under the Rules of Business, 1996, Clause 12 of the Planning Division, the Ministry of Planning is empowered to coordinate development activities that involve multiple ministries or divisions. Another significant concern is the *lack in the democratic system* in planning, where the posts of board members and chairman of RAJUK and the local representatives, which are the posts of top-level personnel of these authorities, are not permanent. The Directors and Deputy Directors of RAJUK, sourced from various departments across multiple ministries, are assigned to their roles through a system of deputation (Afroz & Rahman, 2020). As these posts are linked to the democratic system of Bangladesh, personnel in such posts would change after a specific period. This compromised the leadership capacity required to drive urban development. However, it can be stated that the perceptions of those officials and public representatives are to be blamed for that. If they tended to follow the decisions taken by the preceding officials or representatives for the well-being of the area, this challenge would not bother them. The *exclusion of local government bodies* from the planning and decision-making processes in the initial planning and subsequent implementation processes of the DMDP is also a crucial concern. Early-stage coordination is significantly more effective in the policy-making and planning process, ultimately enhancing the quality of the plan (Islam & Haque, 2016). The *reluctance or unwillingness of the upper-level of local authorities* to fully adopt or integrate the DMDP into their planning practices, results in their inadequate integration into urban planning initiatives. The performance of top managers, such as deputy commissioners and secretaries, is closely tied to the duration of their tenure. If a top manager believes their tenure will be brief, they are less likely to pursue reforms or implement new initiatives (Jahan, 2009). This situation is further exacerbated by the *insufficient technical expertise, staffing, and logistical support at the local level*, where *funding does not align* with the phases or needs outlined in the DMDP, undermining its sequential and strategic implementation. Various institutional limitations within RAJUK significantly impact its operational efficiency (Afroz & Rahman, 2020). This deficiency in the institutional capacity of RAJUK has been identified as a key factor contributing to the unplanned urban development within its jurisdiction (Mahmud, 2007). In Bangladesh, every agency implements its projects year-wise. Therefore, the development activities performed by RHD⁷, UDD, or RAJUK, as per the DMDP, cannot be synchronized. This synchronization is neither possible because for the development and management of the Dhaka Metropolitan Area, there are twenty-two (22) ministries (out of 37) and fifty-five (55) agencies (Rahman, 2015; Ahmed, Bramley, & Dewan, 2012; Islam, 2005; Islam, 2000), e.g., WASA, DESA, DESCO, TITAS, etc., working within the jurisdiction of RAJUK.

⁷ RHD- Roads and Highway Department

Under the ‘Accountability, Transparency, and Ownership Issues’, a persistent challenge is the *lack of ownership* among both institutions and individual stakeholders, which was observed, undermining commitment to the planning initiatives of the DMDP. Engagement among stakeholders during the initial stages fosters increased motivation, morale, and overall benefits for the organization. Failing to facilitate this engagement can lead to chaos and disorder. This may lead to uncoordinated events, which can obscure the objectives of the plan (Islam & Haque, 2016). Many institutions and local governments view the DMDP as a top-down imposition rather than a collaboratively crafted vision, leading to reluctance from local governments. This detachment was reflected in the *absence of accountability mechanisms*, leaving officials and institutions largely unanswerable for failures or inefficiencies. Accountability is the guiding principle of the processes through which decisions are made and implemented. This principle affirms that individuals or entities exercising public authority can be held responsible for their actions or failures to act (Chowdhury, Panday, Chowdhury, & Panday, 2018; Aucoin & Heintzman, 2000). In Bangladesh, significant barriers to accountability and effective governance include factors such as institutional discord, politicization, and corruption (Huque, 2011). Lack of democratic legitimacy may result in unaccountability to the public in policy making (Papadopoulos, 2003). Through the frameworks of coordination mechanisms, a defined technical and institutional ‘scope of control’ can be established (Finger, Groenewegen, & Künneke, 2005). Central agencies, defined as organizations tasked with the supervision and support of line agencies, represent a prevalent mechanism employed to foster coordination within administrative frameworks (Peters, 2018). It has been hypothesized that the inapplicability of the service rules of RAJUK to deputed employees poses significant challenges in establishing accountability for these individuals (Afroz & Rahman, 2020). Along with the accountability, a *lack of scrutiny* results in unchecked administrative actions and regulatory failure. Among the various actors involved in policy implementation, each must have sufficient scope to evaluate, monitor, and control the activities within their own jurisdiction. Absence of such scope compromises accountability among the actors (Jamil & Panday, 2012). Enhanced monitoring mechanisms are expected to promote coherence among the various stakeholders involved, thereby facilitating the replication of successful practices (Favretto, Stringer, & Dougill, 2015). The limited number of inspectors within RAJUK is insufficient to oversee its extensive areas adequately. Consequently, this deficiency has led to noticeable irregularities at the inspection level (Afroz & Rahman, 2020). Particularly concerning are the instances of *malfeasance and corruption* in RAJUK and local government bodies, which have eroded public trust and damaged the credibility of planning and implementing authorities. These governance deficiencies create fertile ground for mismanagement and discretionary planning decisions that deviate from the DMDP. The absence of effective law enforcement and the prevalence of corruption in development control have significantly contributed to the unplanned growth of Dhaka City (Mahmud, 2007). Allegations have been made against RAJUK regarding the undue influence exercised by politically and financially powerful individuals and groups in the approval and implementation of various projects (Afroz & Rahman, 2020). In examining the governance challenges faced by RAJUK, Afroz and Rahman (2020) identified several factors that contribute to corruption and irregularities. These include inadequate legal provisions and challenges in law formulation, insufficient monitoring and inspection,

gaps in coordination and transparency, undue political influence, the intersection of business and politics, mounting land prices, lack of political will, and deficits in accountability, participation, and inclusiveness. Again, malfeasance in RAJUK and local governments, as well as a lack of accountability and scrutiny, are interconnected. Due to the lack of scrutiny from upper-level authorities, lower-level personnel do not feel accountable for their activities and thereby engage in various forms of wrongdoing and corruption.

Five challenges are considered under the 'Policy and Regulatory Issues'. The study reveals that *incomprehensible policies of the DMDP* are major obstacles at the local level. The absence of a comprehensive implementation plan is widely recognized as a significant challenge for both the master plan and the structural plan (Afroz & Rahman, 2020). The operationalization of the concept of consistency necessitates that decision-makers possess a thorough understanding of the contents of their comprehensive plan and requires a rigorous analysis to determine whether a particular approval aligns with the objectives and stipulations outlined in the comprehensive plan of the community (Ohm, 2021). However, stakeholders often struggle to interpret and implement the complex and unclear planning policies of the DMDP due to their technical and bureaucratic nature. These policies did not adequately reflect local needs, realities, or capacities, resulting in implementation gaps and noncompliance. Moreover, the *lack of mechanisms for regulatory consistency* across plan implementation authorities contributes to fragmented implementation, duplication of efforts, and enforcement loopholes. Standardized procedures and enforcement mechanisms across different agencies could help to overcome this challenge. Coordination issues arise due to the involvement of multiple institutions and the overlapping nature of their jurisdictions (Panday, 2006). Additionally, the absence of institutionalized rules and regulation, coupled with problematic financial management, further exacerbates these challenges (Panday, 2007). This has become one of the most critical issues in interdepartmental activities within the field administration in Bangladesh (Ahsan & Panday, 2013). To ensure effective coordination in policy implementation, it is essential to adhere to appropriate rules and a clear hierarchical structure. When formulating these rules, it is crucial to specify the functions of each actor distinctly, rather than merely focusing on the structural framework within which they operate (Panday & Panday, 2008). Moreover, good governance can play a vital role here. As the concept of 'governance' can be defined as a distinctive approach to governing that emphasizes the maintenance of coordination and coherence among a diverse array of stakeholders (e.g., political entities and institutions, corporate interests, civil society organizations, and transnational governmental bodies), each with their own distinct purposes and objectives (Papadopoulos, 2007; Papadopoulos, 2003; Pierre, 2000). *RAJUK's self-violation of the DMDP* through unauthorized or politically influenced developments further undermines institutional legitimacy, suggesting a disconnect between policy formulation and institutional behavior. This contradiction not only questions RAJUK's authority but also signals a broader failure in performing planning responsibilities. Over the past decade of the DMDP, numerous violations of the Plan, specifically the filling of wetlands within Dhaka City, have been observed, particularly in the context of real estate development and the activities undertaken by RAJUK (Mahmud, 2007). In numerous instances, RAJUK has undertaken various projects in these areas, violating the Plan. According to Afroz and

Rahman (2020), RAJUK is considered the 'largest land grabber'. Notable developments such as 'Jhilmil,' Uttara (3rd phase), Jalshiri, Bashundhara, Eastern Housing, and Goran (Chatbari) have been constructed in flood-flow zones (Afroz & Rahman, 2020). The *lack of a sequential implementation strategy* of the DMDP results in fragmented and often contradictory development outcomes. Again, the *lack of initiatives from RAJUK* to engage and support local governments exacerbates the planning process, hindering the proper implementation of the DMDP.

As 'Awareness, Perception, and Acceptance Problems', four challenges are grouped considering behavioral factors. The study finds that *public perception towards planning* is often negative or misinformed, which leads them to pursue unauthorized development, hindering the proper implementation of the DMDP. Within the DMDP area, the violation of established laws is common, as indicated by a recent survey conducted by RAJUK. This study reveals that approximately 70% of the buildings in Dhaka City are non-compliant with established building codes (Afroz & Rahman, 2020). Again, a significant *knowledge gap*, particularly at the local government level, exists regarding the aims, benefits, and mechanisms of the DMDP, leading to limited civic engagement, resistance to planning initiatives, and preventing effective application by the plan implementation authorities. Furthermore, the *lack of acceptability of the DMDP* reflects resistance or lack of support from the other plan implementation authorities towards the DMDP due to perceived inadequacies or misalignment with local needs, as well as ineffective communication strategies from RAJUK. The involvement of community members is crucial at the implementation stage of plans to ensure they align with the interests of the people (Afroz & Rahman, 2020). However, there are concerns regarding inadequate engagement with the relevant stakeholders while implementing the DAP. Additionally, critiques have emerged about the lack of opportunities for experts to participate in the consultation process in a free, fair, and effective manner (Afroz & Rahman, 2020). The issue of *feeling of supremacy* refers to individuals or groups perceiving themselves as superior to others. All the plan implementation authorities, e.g., RAJUK, CCs, municipalities, etc., felt this supremacy and often undermine each other, inhibiting meaningful engagement in planning and development.

Taken together, these challenges represent a systemic failure in urban governance that undermines not just the DMDP but also broader ambitions for sustainable and inclusive urban planning in Dhaka. For effective growth management, the right mix of instruments is essential (Jain et al., 2019; Pallagst, 2017; Jansen, 2005; Bengtson, Fletcher, & Nelson, 2004; Carruthers, 2002a; Blair, 2001), which was absent for the DMDP. Addressing these issues will require comprehensive institutional reform, capacity building, decentralization of planning authority, strengthening inter-agency coordination, enhancing merit-based leadership, promoting transparency and accountability, simplifying policies, building public awareness, and a reimagined participatory approach that embeds local voices into the planning and implementation process.

This study finds three ways for maintaining regulatory consistency. One way indicated that regulatory consistency could have been achieved at that time through the proper implementation of the DMDP itself. The other one suggested that this could have been accomplished by developing action-oriented plans based on the guidelines of the DMDP. Conversely, the third one posited that separate master plans might have fostered this

consistency if they adhered to the directives of the DMDP, as such plans should maintain vertical consistency (Knaap & Nelson, 1992).

Government institutions have a significant impact on the consistency of regulation across metropolitan regions (Carruthers, 2002a; Burby & May, 1997; Lewis, 1996). Institutional fragmentation causes urban sprawl (Carruthers, 2002a; Carruthers, 2002b; Carruthers & Ulfarsson, 2002), whereas, regulatory consistency and jurisdictional cooperation across metropolitan areas can reduce urban sprawl (Burby & May, 1997). So, regulatory consistency is important among the plan implementing authorities. The absence of cooperation results in a 'porous' land market in areas comparatively free from regulation (Landis, 1992). Therefore, the state and regional planning attempts should be aimed at increasing cooperation among local governments (Carruthers & Ulfarsson, 2002). It is high time for Bangladesh to take such an attempt for a comprehensive physical development within any urban boundary with multiple physical plan preparation and implementation authorities.

Conclusion

This study investigates the regulatory consistency among the authorities responsible for implementing the DMDP and reveals a notable lack of coherence among these entities. The implementation of the DMDP has encountered a multitude of interwoven challenges that have collectively contributed to regulatory inconsistencies. These include prevalent institutional incoherency, insufficient ownership of the plan, unclear local policies, reluctance from local governments, a sense of superiority among officials, misconceptions held by the public, and a lack of initiative from RAJUK, among other factors. The study proposes three distinct approaches for addressing the identified regulatory inconsistencies. However, these measures stipulate that local governments are obliged to adhere to the guidelines established in the DMDP or to implement plans developed in compliance with those guidelines to maintain regulatory consistency among the physical plan implementation authorities within the DMDP area. This study represents a pioneering effort in the field, serving as a valuable reference for future researchers interested in similar issues in both developed and developing nations. It is important to note that this study relies exclusively on online scholarly articles; thus, it excludes many hard copy publications and unpublished literature. Additionally, the study lacks empirical analysis using quantitative data, which could illuminate the relationships among the identified challenges and measure the extent of regulatory consistency among the relevant implementation bodies within a specific jurisdiction. Future research could benefit from exploring these areas through quantitative methods.

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