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Pushpanjali Residents Welfare Association,
(Reg. No.S-27904)

Director (Plg.) MPR/TC,
D.D.A. Vikas Minar N. DELHI-2
Dy.No. 382
Dated 11/11/11

A-8 Pushpanjali Farms
Bijwasan
New Delhi 110061
Tel:28062124/28063200
E-Mail: pushpanjali.bijwasan@gmail.com
Date: 11 Nov 2011
File Ref: Pupcor 513.doc

Director (Planning) MPR
Delhi Development Authority
6th Floor, Vikas Minar
I.P Estate
New Delhi 110002

Copy: Hon. Minister for Urban Development, Govt. of India

Dear Sir,

Subject: Mid-Term Review of Master Plan of Delhi –MPD2021

We are a non-profit organization representing some 175 owners of farm land in the rural area of Delhi. Our area falls under the revenue estates of Villages Bijwasan and Bhartal and the area covers almost 300 Hectares under Zone G, Sub-zone 18 of the Master Plan of Delhi MPD2021.

Kindly refer to the DDA Public Notice dated 4-10-11 inviting suggestions from the public regarding proposed modifications to the Master Plan of Delhi.

With reference to the section of this plan entitled - Environment - Section 9.6, which reads as follows:

Green Belt: "The Plan provides for agricultural land as Green Belt along the border of NCT of Delhi, in synergy with the provisions of Regional Plan 2021 of NCR. The belt extends from the NCTD boundary up to a depth of one peripheral revenue village boundary, wherever possible."

1. **Land Use Plan:** We would point out an anomaly in MPD 2021, that the drawing showing the land-use plan is not consistent with the above requirements and needs to be corrected for the following reasons :

- (1) The area marked for "Urbanisable Area" in the "Land Use Plan" for Zone G-18 does not comply with the above-stipulated definition of Green Belt. The peripheral revenue boundary of village Bijwasan, which adjoins the border of NCTD, covers a much larger area than marked as "Green" in the land use plan. This anomaly between the Master Plan guidelines and the land use plan, is already the subject of much litigation and confusion amongst the residents, MCD and the revenue department of Delhi Government. Accordingly it is suggested that the land use plan be amended to comply with the above stipulated guidelines in the Master Plan. A detailed map showing how this proposal would affect our area and other adjacent areas is shown as Attachment #1. Specifically

Suggestion
Jant
11/11
Dy. Dir (P&M) MPR
Ms Anju Assam

11/11
A-D.(P&M) II

showing the village revenue boundaries of Zone G - Subzone 18 which should be reserved for green belt.

- (2) The "urbanisable area" shown in the land use plan for Zone G-18 falls within the noise affected zone of the IGI Airport as a new runway no. 29/11 has recently been commissioned in 2009, much after MPD2021 was notified. This lies at a close distance of 300 meters along the length of the entire subzone. The Ministry of Civil Aviation has already recommended to DDA that no new residential developments be made in the vicinity of the airport runways due to severe noise pollution. Hence the area should be retained in the Green Belt. See Attachment #2.
 - (3) The "urbanisable area" also falls within the safety zone of Airport Authority of India who will not permit any high rise buildings adjacent to the airport for safety reasons. A similar Safety Zone is recommended by international organizations such as the ICAO (International Civil Aviation Organization) and Federal Aviation Administration (USA). This allows typically only three dwelling units per hectare in this aircraft safety zone #6 – see Attachment #3.
 - (4) The Zone G-18 has already met the planned urban population density as required by MPD2021 as the plan did not take into account the population of the 9 unauthorised colonies with some 2 lakh residents already living in the area. These colonies with high population density are concentrated in the revenue estate of village Kapashera and Samalka which are currently shown to be in the Green Belt. The land use plan should therefore be modified to reflect the ground reality where existing residential areas already exist.
 - (5) Environment Air Pollution next to IGI airport requires heavy growth of trees to offset carbon emissions from Aircraft landing and taking off - currently around 1000 flights per day. Based on airport environmental impact studies current airport emissions are projected to be 166 lakh tonnes of toxic carbon dioxide and other gases by the year 2021. At least 9.76 lakh trees are required in the vicinity of the airport to absorb these gases (based on one full grown tree absorbing 17 tonnes) and also regenerate the oxygen required for the population of Delhi. Accordingly it would be an environmentally sound plan to keep the area green and land owners should be encouraged to plant 400-600 trees per hectare.
 - (6) Water Table in the area is receding at approximately 10ft per year despite water harvesting. Hence acute water shortage already exists, preventing further increase in population density of the area.
 - (7) The above proposal has been discussed and approved by all the other RWA's representing the sub-zone G18 ie. Representatives of village Bijwasan, Samalka and Kapashera.
2. **Road Network:** Two roads planned in subzone G-18 require modifications for the following reasons:
- (1) The existing road network between NH8 and Dwarka (known as Dwarka Link Rd) should be retained at 60 meters ROW and parallel Kapashera to Najafgarh road widened to cater for future traffic growth. This is because there is no need for two roads of 100 meter and 80 meter ROW so close to each other especially as traffic in the area will

reduce with construction of new Western Peripheral Expressway providing direct link from Dwarka to Gurgaon and Manesar. Furthermore it is possible to merge the slip road on the airport side with the Dwarka Link Road, thus providing additional lanes for motor vehicle traffic on this road if ever required in the future.

- (2) Similarly a new 30m road planned between Bijwasan and Dwarka along the IOC depot is not feasible as the area is already under acquisition by Bharat Petroleum for expansion of the depot. We would recommend this be relocated to the area along the opposite side of the Rewari Railway line to connect Dwarka with Palam Vihar.
(Both of the proposed changes are shown in Attachment #1)

3. Control for /Buildings within Residential Premises:

- (1) Para 4.4.3 G) of Master Plan allows only 100 sq.m or around 1% ground coverage for Farm Houses. This is clearly impractical and has lead to illegal construction in the form of unauthorized colonies and Farm Houses in the Green Belt. The permitted built up area needs to be kept in line with international norms for Green Belt which is around 25% ground coverage. A comprehensive farm house policy is currently being planned by DDA for those premises that have exceeded 1% covered area and this should be included in the revised Master plan.
- (2) The minimum size of holding for construction of Farm Houses should be reduced from 1 Hectare to 0.4 Hectare. This is to permit subdivision of the property between family members who inherit the land but are unable to build upon it.

Proposed Amendment to the Section on Delhi Urban Area - Paragraph 3.2 (MPD2021)

In view of the above, we kindly request you to amend the land use plan and the relevant section of the new Master Plan as follows:

“In the Green Belt only 25% ground coverage will be permitted for residential use. This would release some pressure on undeveloped land and still preserve the green belt, as 75% of the area would be available for cultivation and maintained as a green belt Area.

For the sake of good order and to be consistent with the above recommendations the following changes should be made to

Table 9.4: Permission of Use Premises in Sub Use Zones

S.No Use Zone Activities Permitted

Para 1. Green Belt Section “Green Belt”, which reads as follows:

“1. Green Belt Forest, Agriculture use, Vegetation belt, Dairy Farms, Wild life sanctuary, Bird sanctuary, Park (Theme park for eg. Biodiversity Park), Smritee Van, Plant Nursery, Orchard, Area for water harvesting, Floriculture farm, Open Playground, Agro forestry, Amenity structures (List given in note). Any structure in this zone shall be of temporary nature.”

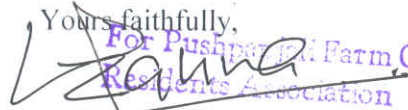
Add to the end of this paragraph “ Permanent structures covering a maximum of 25% of the total land area shall be permitted for construction of agricultural buildings and dwelling units.”

Para 4.4.3G) Farm House

Change minimum plot area to 1 acre (0.4 Hectare) and Maximum Floor Area from 100 meter to 25% of plot area. Building height to be restricted to 8 meters.

Thanking you for your kind consideration of this matter.

Yours faithfully,


For Pushpawati Farm Owners &
Residents Association

V.K. Mahna

President

President

Attachments:

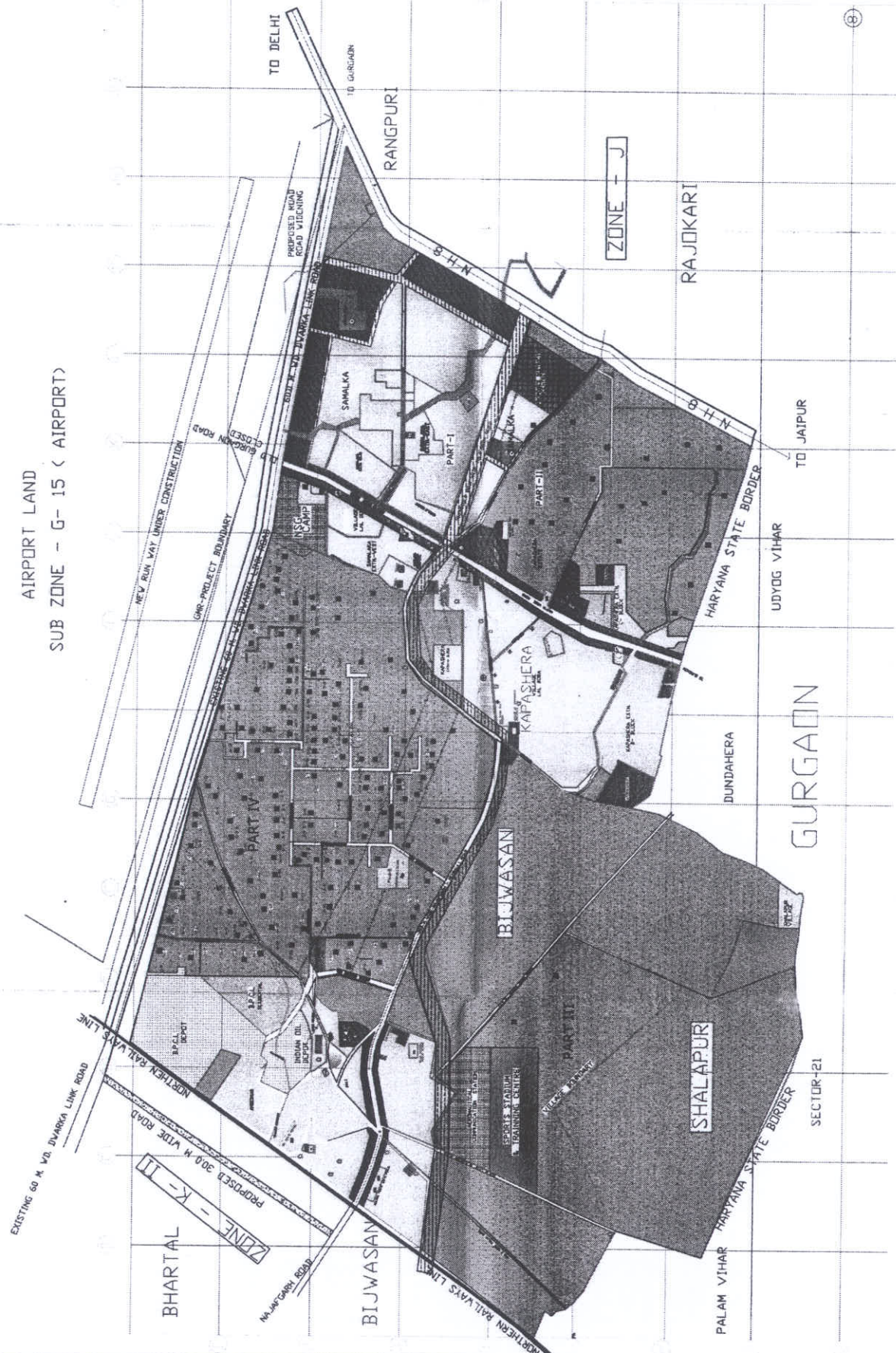
#1 – Modifications to Master Plan Land Use Plan Drawing for Zone G-18.

#2 – Letter from Ministry of Civil Aviation

#3- Airport Noise and Safety Zone as per Federal Aviation Administration

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AIRPORT LAND
SUB ZONE - G-15 (AIRPORT)



LEGEND

BOUNDARIES

- State Boundary
- District Boundary
- Block Boundary

RESIDENTIAL

- Low Density Residential
- Medium Density Residential
- High Density Residential

COMMERCIAL

- General Commercial
- Special Commercial

INDUSTRIAL

- General Industrial
- Special Industrial

RECREATIONAL

- Park
- Playground
- Sports Ground

UTILITY

- Water Body
- Drainage
- High Voltage Line
- Low Voltage Line

GOVERNMENTAL

- Government Office
- Public and Semi Public

MISCELLANEOUS

- Open Space
- Green Belt
- Water Body

PROPOSED & EXISTING IN ZONE

SCALE

1:50,000

DATE

1980

BY

1

PROPOSED MODIFICATIONS IN MASTER PLAN FOR SUB ZONE G-18

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ROHIT NANDAN
Joint Secretary,
Tel.No.24617692
Fax No.24654055

उत्त सचिव
मानव विमानन मंत्रालय
भारत सरकार
नई दिल्ली - 110003
JOINT SECRETARY
MINISTRY OF CIVIL AVIATION
GOVERNMENT OF INDIA
RAJIV GANDHI BHAWAN, SAFDARJUNG AIR PORT
NEW DELHI - 110003

D.O.No.A.60015/054/2009-DG

July 9, 2010

Dear Sir,

I am writing this in connection with various court cases filed in the Delhi High Court by NGOs and residents associations of colonies in the vicinity of Indira Gandhi International Airport, complaining of noise pollution caused by operation of aircraft to/from the airport.

2. As you are aware, the airport in question has been in existence much before the development of residential colonies in its vicinity. Though, statutory clearances must have been taken while developing these colonies, the question of noise pollution on account of flight operating from the airport perhaps did not occur at that time, since there are no separate norms specified by M/o. Environment and Forests for Aviation operations. The Ministry of Environment and Forests is also undertaking a study to finalise these norms.

3. You will agree that development of airport infrastructure and provision for land planning in the vicinity of airports need to be balanced in such a way that a conflict situation is avoided. Since DDA is the nodal agency for such land planning, I would suggest that the possibility of having only non-residential buildings in the vicinity of the airport be considered by DDA and as far as possible dwelling units should not form part of land planning in these areas. Since the airport is still in an expanding phase, it would be worthwhile that master planning of the area is done to avoid all conflict situations in the years to come.

4. I hope you will appreciate our concerns in this regard and issue necessary instructions to all concerned to keep noise pollution factors in mind while formulating land planning projects.

Yours,

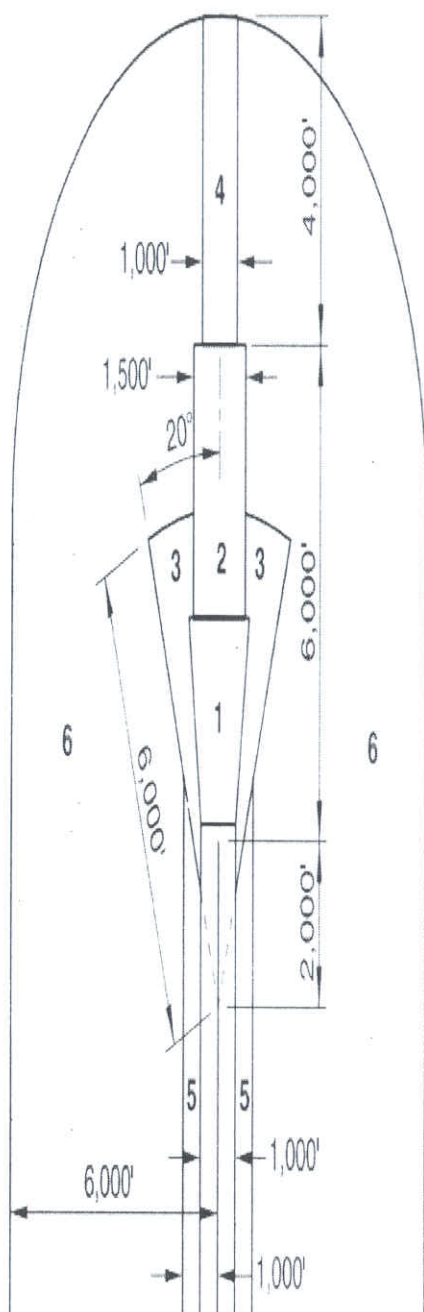
Yours sincerely,

(Rohit Nandan)

Shri Ashok Kumar,
Vice Chairman,
Delhi Development Authority,
Vikas Sadan, INA,
New Delhi - 110 003.

Airport Safety Zones	FAA Safety Zone, Development Requirements and Restrictions The reason for establishing safety zones is to control the number of people on the ground in the vicinity of airports at risk of death or injury in the event of an aircraft accident and noise exposure on take-off or landing. The basic objective is that there should be no increase in the number of people living, working or congregating in these areas and those commercial activities which generate garbage thus posing a risk of bird hits to aircraft are prohibited.
Zone 1 (Runway Protection Zone) Width 300M to 500M Length 760M	Zone Starts 70M from end of Runway 1. Land uses, which by their nature will be relatively unoccupied by people should be encouraged (mini-storage, small parking lots, etc.)
	2. Schools, play fields, hospitals, nursing homes, and places of worship are prohibited.
Zone 2 (Inner Safety Zone) Width: 450M Length :1000M	1. Schools, play fields, hospitals, nursing homes, and places of worship are prohibited.
	2. Housing prohibited.
Zone 3 (Inner Turning Zone) Length 1800M Arc 60 deg	1. Schools, play fields, hospitals, nursing homes, and places of worship are prohibited.
	2. Maximum of one dwelling unit per gross acre. Height restriction.
Zone 4 (Outer Safety Zone) W:450M L: 1200M	1. Schools, play fields, hospitals, nursing homes, and places of worship are prohibited.
	2 Height restrictions in approach zone at 50:1 up to 3 KM along centerline and 40:1 for next 12 KM. Width varies from 300M to 5000 Meters
Zone 5 (Sideline Zone) Width 300M	1. Schools, play fields, hospitals, nursing homes, and places of worship are prohibited. 2. First 120M from centerline of runway to be object free zone. 3. Height Restriction; 34:1
Zone 6 (Airport Operations Zone) Width 1800M From c/l	1. Maximum of three dwelling units per gross acre.
	2. Height Restriction: 34:1 from center line of runway up to a maximum of 10 meters

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Example 3:

Long General Aviation Runway

Assumptions:

- Length 6,000 feet or more
- Approach visibility minimums < 3/4 mile
- Zone 1 = 1,000' x 1,750' x 2,500'

FIGURE 9K

Safety Compatibility Zone Examples