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

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Date: 11 Nov 2011
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*Minister has, denied
this to be examined.
a data bank of all
suggestions be prepared.*

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OFFICE OF UDM
Dy. No. 4002
Date 18/11/11

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

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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 Pushpajit 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.