OBJECTIONS AND SUGGESTIONS IN THE ORDER OF PRIORITY OF

BHOPAL INTERNATIONAL CENTRE (B.I.C.)

(www.bhopalinternationalcentre.org)

- **Objection :** Infinite F.A.R. clause is Ultra vires - No government is allowed infinite leeway .If at all , it has to be done via legislature (By changing the Act) . Besides, infinite permission violates the concept of planning. Moreover , it also transgresses the proposed precondition of at least 1/4th the height of the taller building kept as distance between any two buildings …1/4th of infinite is also infinite. This move will change the signature of Bhopal –from horizontal to Vertical led.

Suggestion : Remove the clause. … As a compromise, limits must be placed and then increased ad infinitum at the end of each Plan period .

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- **Objection :** Unlimited Mixed Land use –Esp. in proposed growth corridor – too is Ultra vires. No government is allowed unlimited authority. If at all, it has to be done via legislature (By changing the Act). Unlimited could be interpreted as purely residential or purely commercial in extremes.

Suggestion : The provision should be capped… Overall, there should not be more than half - 50 %- space for inorganic use …Besides at least 25% must be marked for Purely Public , Purely residential ,Purely commercial ..In other words , Mixed land use cannot exceed 25% even till 2047 (currently it is 4.01 %) A min of both residential and commercial a must for mixed land use (At least 6.25% each-Less than 1/16th would make it meaningless).

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- **Objection :** Definition of Highrise building altered - to begin from 45 M upwards.

  Suggestion : Skyline to be protected- no hilltops should be visible from rooftops ; so the 45 M limit should be subject to not breaching skyline .

- **Objection :** Lake / Wetland Shoreline tampering - by dividing into FTL , Buffer and Influence zones without clear cut specifications.

  Suggestion : Shoreline to be protected at all costs. Ideally, all encroachment from 2002 (when it was designated as Ramsar Site) should be removed . As a compromise ,the cut off date for all existing structures could be 2017 -when Wetland rules were put up to be notified …For all future actions ,implementation should be frozen till 2047- pending declaration as Wetland City. (Likely to happen in near future -as Indore -with much less water bodies- has already been granted the Wetland City status couple of years ago)

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- **Objection :** Tweaking the rules for lobbies viz. in Guradighat village – adjacent to proposed Western Bypass.

  Suggestion : Freeze on land use change around western bypass till 2047- It'll also set a precedent. Pause the establishment of Satgarhi Industrial zone too .A compromise could be to allow at most a Logistics hub-if by 2047 , the studies show no adverse impact, the associated aspects of the Bypass could be Greenlit .Ideally , build the entire bypass as an elevated Expressway-since the ostensibly stated purpose is merely bypassing the city / taking a detour. (Creating a few underpasses for animals is at best a mitigation)

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- **Objection :** Manifold increase in F.A.R for the influentials –six times the current permitted limit..In LDR (Low Density Residential Area) in Wetland Zone.

Suggestion : Ideally , the status quo should be maintained .As a compromise, at most twice the current limit may be allowed/regularised – That too at least with six times premium F.A.R.

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- **Objection :** Data insufficiency viz. No data about the size of overall economy of the city.This will skew the Model of implementation.

  Suggestion : At least Overall data must be mandatory before proposing any activity.

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- **Objection :** Data discrepancy viz. Projecting the population in 2047 based on current rate (despite projection of previous two plans proven to be widely off the mark).

- **Suggestion :** Use the NRR (Net Replacement Rate)- to finetune the projections. Using it puts the projected population around 40 Lakhs in 2047.Data purity should be sacrosanct.

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- **Objection :** Exaggerated goals 27% Greenery Proposed –somewhat overstated (incl.Narional Park ,Ratapani sanctuary) -still falls short of desirable 30 pc.-Global norm.

  Suggestion : Incorporate Blue-Green-Plan..Ideally , Green-Blue-White-Brown plan (incl .Air & soil): Organic stuff should be 50 pc (incl. non-green Open spaces)

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- **Objection :** Underwhelming Aims : Current average AQI -79(that too based on suspect data) ; misleading in that the gap between best and worst points is huge . 50 AQI- proposed as an average.

- **Suggestion :** Aim for 50 AQI across the board on all points –not merely as an average. Accordingly , suggest concrete steps with resources and timelines.

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- **Objection :** Documents not shared with Public viz CEPT report .

  Suggestion : Upload CEPT and other reports / proposals given by consulting bodies on TNCP website.

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- **Objection :** Information Asymmetry -No clarity about objections and suggestions.

  Suggestion : Put all the objections till date - from 2005 till 2026 on TNCP website .. So that Intellectuals need not run from pillar to post or go for RTI.

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- **Objection :** No resources ascribed to goals - esp. while making projections.

  Suggestion : Mention resource allocation for at least overall goals viz. the total size of the economy- current and projected- should be mentioned. That'll give some idea how 49 K crore worth of projected activity could be carried out in the plan period.

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- **Objection :** No timelines given for various activities.

  Suggestion : Mark specific timelines-preferably with matching resources.

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- **Objection :** Insufficient Norms : viz. Only $1/4^{th}$ the height of taller building to be left as space between tall buildings.

  Suggestion : Increase Space between tall Buildings—to half the height of taller building- so that each side of the building gets sunlight for at least half the day. ;

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Objection : Tall buildings proposed around wider roads but height not specified.

Suggestion : Height of buildings should be proportional to the width of the road viz . max 18 m tall building allowed at 18 m road. No tall Buildings permitted without prior infra development.

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- **Objection :** Zones of TDR not specified.

Suggestion : No TDR should be given in Buffer zone.; No TDR should be sanctioned without Infra development in the transfer zone.

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OBJECTIONS AND SUGGESTIONS IN THE ORDER OF DRAFT

BHOPAL MASTER PLAN 2047 OF TNCP

PREFACE (Pg. 6518)

Guiding Principles

- Reforms driven

Objection : Neither possible to shunt 12.5 % population from catchment area nor practical to shut 6.25% population from commercial establishments in residential areas .

Suggestion : A negotiated compromise with differentiated approach and cut off dates should be adopted. At most 8-10 K major violators can be removed –rest accommodated /regularized/ one time settlement in varying degrees ,Covid onset as cut off date seem appropriate since maximum establishments came up in this period.(People who lost jobs set up small businesses)

- Self sustainable and economy booster

  Objection : Looks unlikely with 49 K cr. needed over 21 yrs. and an annual BMC budget of around 2 k crore -that too mostly spent in establishment cost and loan repayment ;

  Suggestion : Boost the Economy by all means but also increase economic activity simultaneously so that per capita income too rises in proportion to the growth of the size in economy.

(PREFACE : Pg. 6519)

- **Objection :** Infinite F.A .R . (esp. in Growth Corridor –For Buildings over 75 m height)

  Suggestion : Infinite is a no-no in any plan ... Besides, violates another provision viz. ¼ th distance between any two high rises ; needs unlimited infra etc. too. Set a limit -howsoever high with extendable F.A.R during the plan period.

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- **Objection :** Unlimited Mixed Land use (In certain areas).

  Suggestion : Limits must be capped. Linked to the width of the road ; Should be linked to infra development too…Link the height of building too with the width of road viz. 18 metres height limit foe building next to 18 mt wide road … For greater height , make the building as distant from the road as the enhanced height (subject to skyline not being breached) …The shadow of building should not be taller than road plus open area so that road too gets sun half the day.

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- **Objection :** Exclusivity in LAP (Local area planning) meant for Area around Metro ,Growth corridor and TDR.

Suggestion : At least the local representatives / Leaders should be involved mandatorily…Ideally , involve residents at the Planning stage too – beyond merely at the Publishing / implementation stage.

- **Objection :** Proposed Modern provisions for parking . Roughly a third of the vehicles in any city are on road at a given point of time .In Bhopal the figure comes to around 7 lakh vehicles …Current parking facilities cover around two lakhs .

Suggestion : Till this figure is at least doubled ASAP , Bhopal's traffic would remain chaotic .At least 50 percent capacity - parking space for 3.5 lakh vehicles- is needed for any semblance of order.…Variable parking charges -both by space and time/ timing could be the first step.

- **Objection :** The official Metropolitan Region vision not shared in Public space while Concept/ Vision of Metropolitan Region is referred to as the context for Master Plan 2047 Draft.

  Suggestion : Draft Metropolitan Vision should be Published in the same time frame as Bhopal Final Publication - for better alignment and tuning ..Any more gap would permit vested interests to give spins again-as in previous plans.

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CHAPTER 1 : INTRODUCTION

- 1.4.1 (pg 6543)
  Objection : No details of Metropolitan Vision: MRDA gives the impression of being the dominant entity. Approach is to be integrated and holistic for sustained and recurring development. There is no clarity about inclusion or participation : Integration with plurality ; Holistic/ Unity in diversity .

  Suggestion : While for development activities MRDA could prevail but for welfare stuff the primacy /autonomy of constituent bodies must be

ensured…Shareholders / Citizens Must be included in planning and stakeholders/ Residents involved in participation…Need both inclusion as well as participation. Else mistake of forcing Metro rail project without Metropolitan region authority would be repeated..

- 1.4.4 (pg 6545)
  Objection : No mention of Prehistoric rock paintings- from IGMOM (Indira Gandhi Museum of Man) till Kathotiya Village on Kolar Road.

  Suggestion : This is not merely a heritage site for India but for the mankind –will be key to granting Bhopal Region the UNESCO Heritage Region status .Hence should be included in the list and highlighted.

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- (pg 6552 - table 1.2)
  Objection : Seeking Integrated Industrial areas for 75 yrs is mismatched with plan date of 2047 -Amounts to Resource / Land colonization / Grabbing.

  Suggestion : No reserving land for any activity beyond 2047 …As a compromise ,that could come in the Vision. For industries too , the extent of land earmarked should be on the basis of current and projected utilization with periodic reviews.

CHAPTER 2 :

- 2.3 (pg 6559 - table 2.2)
  Objection : Projected Population : By extrapolating the data of 2011, 2019 … Faulty (as proven by projections in earlier plans)

  Suggestion : Take into account the decreasing NRR (Net replacement ratio) …So the future projection will be even less.(accordingly less water, less roads , less enhancement of schools etc.)

CHAPTER 5 :

- 5.1 (pg 6584)

  Objection : Comprehensive Mobility survey not available in Public space…Besides , as reported in some newspapers ,the survey was done by the metro rail corporation- which is a conflict of interests. Moreover the data too prima facie looks unreliable viz. 37 % people travel by walking in Bhopal is unreasonable.

  Suggestion : Comprehensive Mobility survey should be done by an Independent Body . Besides, mere " OD" (Origin and Destination) surveys are not enough for major projects. (pg 6584 - table 5.1)

  Objection : In all likelihood rate of growth of four wheelers will increase- that seems to have been overlooked- even while the rate of growth of population may stablise / reduce .The fact that 60 pc roads are less than 18 mts may become problematic.

  Suggestion : Link the height of buildings too with the width of road ; viz. no higher than 18 m building allowed on an 18 m wide road ; besides roads multimodal public transport must focus upto 60 pc. on these roads .

- 5.7 (pg 6588)

  Objection : No numbers about the need and capacity of parking are mentioned. The thumb rule is that at regular times nearly a third of vehicles are on road. By that token there are 7 lakh vehicles on road in Bhopal and the parking capacity is for around 2 lakh vehicles ..Less than 50 pc capacity is a guarantee of traffic chaos ..It has been underplayed.

  Suggestion : The parking capacity should be doubled immediately using differentiated time and space charges.viz. expensive parking at peak hours of hot spots.

- 5.12 7 (pg 6608)

  Objection : Six Metro lines : two under construction and 4 more proposed …The project was pushed through despite not having a metropolitan Authority (A prerequisite) .GOI rules now admit that Metro is not viable in Cities with less than 35 L population.

  Suggestion : After the completion of the two current lines- where the work is in progress further extension should wait till there is at least 50 pc occupancy or till the time Bhopal's population becomes 35 Lakhs .

CHAPTER 6 :

- 6.2 (pg 6609) :

  Objection : Slums : approx 1 L : 5 L population (nearly 20 pc)...Plans for Slum free (Jhuggi Mukt) Appears some mismatch in data wherein BPL/APL families are much more.

  Suggestion : If Slum reduction/ removal is linked to enhancement of hawkers/ vendors spaces and numbers , it may work better.

CHAPTER 7 :

- 7.1.2 (pg 6611) :

  Objection : Average AQI :79.7-that too based on unreliable data.
  (Between 50-100 is considered OK for cities) -somewhat misleading that there is a vast gap between worst and best points. It is targeted to attain an average of 50 AQI.

  Suggestion : The aim should be to have an AQI -50 or less across the board –not merely average. (No point should have an AQI higher than 50) .

- 7.4.8 (pg 6620) :

  Objection : Waterlogging is admitted to be a problem but not a serious problem- No detailed measures proposed. A general concept of sponge city with roadside channels is mentioned.

Suggestion : Clearing encroachments from natural water channels as also man made drains ; interconnecting lakes too might help.

CHAPTER 10 :

- 10.2 (pg 6629)

  Objection : Inaccurate projection -The projected need for 679 mgld water is based on the projected population of 45L.

  Suggestion : Since by all trends population growth is going to be lower so the gap would be lower- even non existent. Besides sources such as Kerwa reservoir , Seep river (now linked with Kolar) , borewells etc. have not been accounted for totally. ..Moreover *Baoris* (Stepwells) need to be revived… Rest could be managed by efficient use-15 % leakage too is on a higher side for such a large figure.

CHAPTER 11 :

- 11.2 (pg 6633)

  Objection : Limited access to sports infra and Playgrounds. Though Bhopal has the highest no. of national facilities for amateur sports among tier 2 cities , common citizens have limited access

  Suggestion : City needs many more playgrounds and indoor facilities to really become a metro.

CHAPTER 13 :

- 13.1 (pg 6638)

  Objection : Horizontal to Vertical growth ratio unclear**.** The table says that there should be a balance of vertical and horizontal development without specifying details.

  Suggestion : As Bhopal is a Public led city (not a commercial city - No Capital city of post industrial era is a commercial led city) its signature is horizontal led…So, Vertical development has to be less than 50 pc. Also due to its geography the skyline cannot be breached – Hilltops should not be visible from rooftops as Bhopal's identity is as city of "Lakes and Hills ."

13.1 (pg 6640)

Objection : LAP : Local area planning proposed as a stand alone exercise around 500m of Metro, Growth corridor and TDR areas…May be converted to exclusive zones.

Suggestion : Local residents and/or Public representatives should be included in planning and participate in implementation.

CHAPTER 14 :

- 14.13.2 (pg 6689)

Objection : 3-5 pc City Parks ..No proposal for city forests.

Suggestion : Need more city parks and city forests Global formula of 3-30-300 should be followed(at least 3 Trees in Sight:**;** 30% Tree Canopy Cover in every neighborhood ; 300 Meters to a Park) . Also, as many trees at least as the population.

CHAPTER 15 :

- 15.33 : (pg 6745)

  Objection : Networking of private CCTV's –Police Eye-could be misused due to Centralisation of data.

  Suggestion : Data should be stored in local servers – Accessed by OTP(One time use) system by police.

- 15.39 (pg 6752) :

  Objection : In proposed market street. commercial use allowed till the depth of the plot.

  Suggestion : Mixed land use on Market streetshould not be more than 50 pc.- half the structure –like home stay where staying is mandatory…

  Also , money received in regularisation should be spent in same area.

CHAPTER 16 :

- 16.9 (pg 6762)

  Objection : Digital twin city - should've been done beforehand.

  Suggestion : Create digital twin future city too as a model

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OBSERVATIONS AND COMMENTS IN THE ORDER OF PRIORITY OF BHOPAL INTERNATIONAL CENTRE (B.I.C.)

(www.bhopalinternationalcentre.org)

- **Observation** : No Transparency in major projects- Impacting over a third of the area and half the population
  Comments : A white paper / note on Smart City as also prescribed use in the plan period is needed..(Now that it is no longer with Union Government)..Also details about Western Bypass , Professors colony redevelopment , Central Vista , Eastern Bypass etc.
- **Observation** : Sketchy Vision-Only four guiding principles mentioned.
  Comments : Share the imagination as to how would the city look if these principles are followed - perhaps a digital model can be presented - on the lines of twin digicity.
- **Observation** : Though it is mentioned that there would be balance of Vertical to Horizontal growth but Signature of the city not decided - whether it would be vertical or horizontal led.
- **Comments :** Bhopal is a Public led city –since no Capital of post industrial age is commercial led. As every Public led city is horizontal led -so would Bhopal. Vertical growth has to be less than horizontal.
- **Observation** : Growth -Livability balance unclear - all things being equal.
- **Comments :** In Bhopal , Growth considerations can at most be equal to Livability conditions but never exceed them-Since livability is its USP.
- **Observation** : Little or no mention of RWA's ,Mohalla Samitis etc.
  Comments : RWA participation should be mandatory during implementation-as conditions change. Implement the RWA Act.
- **Observation** : No specifics about Gumthis / hawkers / Small vendors
- **Comments :** Gumthis /Vendors/ Hawkers ought to be in proportion to Jhuggis/Slums (in turn proportional to BPL/APL).
- **Observation** : Must have overall Vision-Mission. Else , there would be a stumbling and fumbling approach during implementation
- **Comments :** At least the Metropolitan Region vision should be detailed -prepared in the same time frame as Publication of Bhopal Draft and shared with Public.

- **Observation** : Inadequate studies , surveys /data
- **Comments** : Make surveys/ data and studies mandatory in all projects / schemes
- **Observation** : Inadequate prior rehabilitation / compensation before acquiring land.
- **Comments** :Make prior complete rehabilitation and compensation before the outset of all projects.
- **Observation** : No prior development of infra , impact assessment before projects-often it gets ignored till after the completion; comes to light only in case of mishaps
- **Comments :** Prior development of infra to be mandatory before projects/ schemes : High rise ,TOD , TDR etc.
- **Observation** : No provision for Non- plan aspects.
- **Comments :** Have provision for Non- plan : upto 50 pc .
- **Observation** : No Provision for continuous monitoring
- **Comments :** A dedicated body –like BDA-solely for continuous monitoring. Public Account/Social audit by experts/ Experienced every two years.
- **Observation** : Wetland City Status pending
- **Comments :** Treat -As if Wetland City- No more land use change after notification freeze any further land use change till 2047.
- **Observation** : Blue green plan overlooked
- **Comments :** Consider " Organic Cover" instead of green cover- Upto 50%: Incorporating Forests –water- air -Soil (even non-green open spaces)
- **Observation** : Information Asymmetry.
- **Comments :** Must upload all the objections Online ;all the suggestions too.
- **Observation** : No mention of Heat spots .
- **Comments :** Identify heat spots and suggest steps to mitigate.
- **Observation** : No provision for Public -Citizen accountability/Social audit.
- **Comments :** Public accountability/ social audit /expert accountability- every two years.
- **Observation** : Not enough mention about sports.
- **Comments :** Optimise the use of National sports academies.

OBSERVATIONS AND COMMENTS IN THE ORDER OF DRAFT BHOPAL MASTER PLAN 2047 OF TNCP

PREFACE (Pg. 6518)

Guiding Principles

- Conservation of Natural ecosystem
  Observation : No mention of revival.
  Comments : Provision of reviving minor rivers (viz.Uljhavan) and Baoris (Stepwells) too must be included

(Preface : Pg. 6519)

- Green-Blue Plan :Proposals to double greenery , protect wetlands …
  Observation : Modus Operandi not fully explained
  Comments : Extend it to Blue-Green-White –Brown Plan… Include air and soil too .
- Green T.D.R
  Observation : A welcome concept.
  Comments : Must offer Premium Green TDR - give more TDR than offered in other regions .

Social Concerns

- Safe city
  Observation : A welcome concept.
  Comments : Bhopal is already a relatively safe city...Must be sustained. Aim to make it the safest city for women, Senior citizens and Kids.
- Old age Homes :
  Observation : As of now Old ages homes – incl. those initiated by govt. –are flop.
  Comments : Make them Old age Homes –cum- orphanages for Mutual benefit.
  Observation : Rental Housing a good move .
  Comments : Make transition hostels for people migrating into Bhopal on all 8 key arterial roads.

CHAPTER 1 : INTRODUCTION

- 1.1 (pg 6539) : Background : Bhopal as "City Of Lakes "

  Observation : The original city of lakes is Udaipur ; some records even call Nainital too as city of lakes …In other words though true "city of Lakes" doesn't make Bhopal unique.
  Comments : Bhopal Ought to be labeled as "City Of Lakes and Hills" - since both represent Bhopal's primary identity : One natural ; another manmade : Like name and surname .Benefits It'll mark both hills and lakes as unalterable / on-negotiable in any which way over time ; the unchangeables.

- 1.3 (pg 6542)
  Observation : Only sketchy details are given of the previous plans- making the basis of current plan a bit shaky.
  Comments : Mention the percentage of success and failure of previous plans besides highlighting positive learnings and lessons from failures.

- 1.4.4 (pg 6545)
  Observation : Samasgarh : typo as Samratgarh
  Comments : Rectify the typo.

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