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Ref. No. MCHI/PRES/16-17/135

To,

- 1) **Shri Ajoy Mehta (I.A.S.)**
Municipal Commissioner,
Municipal Commissioner of Greater Mumbai
Mumbai - 400 001
- 2) **Dr. Anbalagan P. (I.A.S.)**
Member Secretary,
Maharashtra Pollution Control Board,
Kalptaru Point, 3rd Floor, Opp.Cine Planet,
Sion (E), Mumbai - 400022.
- 3) **Shri Deependra Singh Kushwah (I.A.S.)**
District Collector,
Mumbai Sub-Urban District,
Bandra, Mumbai - 400 051
- 4) **Shri Banshi Gavali**
District Collector (Additional Charge)
Mumbai City Collectorate,
Old Custom House,
Fort, Mumbai - 400001

Sub: Proposed Draft Coastal Zone Management Plans (CZMP) of Mumbai Submission" of the "Objections / Suggestions" on Draft Coastal Zone Management Plan (CZMP) of Mumbai.

Ref: Additional Chief Secretary, Environment Department, Government of Maharashtra & Chairman, MCZMA's Notice dated 29-03-2017.

Respected Sir,

May we invite your kind attention to the above referred Notice dated 25-03-2017 issued by the Additional Chief Secretary Environment Department, Government of Maharashtra and published on the website of MCZMA, Government of Maharashtra & MPCB under Annexure - I, Para IV (a) of CRZ Notification 2011 of the Environment (Protection) Act, 1986 inviting Suggestion / Objections relating to the Proposed Draft Coastal Zone Management Plan (CZMP) of Mumbai.



May 11, 2017

आयुक्त विभाग (मुख्यालय)
महाराष्ट्र प्रदूषण नियंत्रण बोर्ड,
कल्पतारु पॉइंट, ३/३/४ था माल, सावन संकेत जंग
सिने प्लेनिसाथें, सावन (पूर्व),
मुंबई - ४०० ०२२.
२४०३०४३७/२४०२
12/5/17
जिल्हा कार्यालय
मुंबई नगरपालिका
जिल्हा कार्यालय
12-5-17
आयुक्त विभाग (मुख्यालय)
महाराष्ट्र प्रदूषण नियंत्रण बोर्ड,
कल्पतारु पॉइंट, ३/३/४ था माल, सावन संकेत जंग
सिने प्लेनिसाथें, सावन (पूर्व),
मुंबई - ४०० ०२२.

In response to above referred Notice, CREDAI-MCHI is submitting as under:-

The Draft CZMP's of Greater Mumbai provides for the various Reservations, Land Uses, H.T.L. & Buffer Zones etc. on various lands for which layout of buildings has been approved by the Planning Authority viz. MCGM.

Reservations, Land Uses, H.T.L. & Buffer Zones etc. shown on various lands are as under:-

- A) CRZ on the Landward side of the Existing Roads on CZMP.
- B) 100 Meter wide Buffer (Bay / Creek) CRZ - II (Urban) on CZMP.
- C) 100 Meter wide Buffer (Bay / Creek) CRZ - III (Open Space Area / Rural) on CZMP,
- D) Tributaries i.e. water inlets shown as Water Body (Creeks) CRZ - IV B.
- E) Water body shown as Sea near the Haji Ali Tomb, it' H.T.L. and 500 Meter wide Buffer (Bay / Creek) CRZ - III (Open Space area / Rural).

a) **The CRZ is proposed on the Landward sides of the Existing Roads** all over the Mumbai. Mumbai Metropolitan City is already developed over the centuries. Please consider as how CRZ on the landward side of the existing roads is in any way affecting the environment? Entire South Mumbai i.e. Nariman Point, Ballard Estate, Sewri, Colaba, Neapean Sea Road, Bhulabhai Desai Road, Worli are developed and are not affecting the environment including the Redevelopment of these areas. There are large numbers of buildings along the Coast Line which are generally affected being near the sea and are deteriorating and require to undergo redevelopment. To make the Redevelopment economically viable it is necessary to allow TDR & additional F.S.I. as per D.P. - 2034 as is in the case of non CRZ redevelopments in the city on the Landward side of the Existing Roads. Further even slums in CRZ is allowed to be redeveloped along with 4.00 F.S.I. Therefore why should there be any restriction for normal development as per D.P. 2034, considering if the Land is already reclaimed on the Landward side of an Existing Road then how is the construction on the Landward side in any way affecting C.R.Z.

b) **Creek Buffer Zone is proposed 100 mtr. wide** on the various locations of the approved layouts. As per earlier sanctioned CRZ Survey Plan of Greater Mumbai on the basis of INS Nirdeshank's Report of Survey No. 738/7 dated 26th May 1998, the Buffer Zones was **50 Meter wide** from Creek / Bay then and as per that many layouts and Building Plans were approved and buildings are constructed all over the Greater Mumbai. The entire layouts i.e. internal roads, R.G.'s drains etc. is completed on sites. The Buffer Zone is now proposed at 100 mtr. on the Approved existing buildings, Infrastructure, Compound Walls, Gates and Parking Areas, this will also affect the essential services coming in the proposed 100 meter wide Buffer Zone of CRZ - II (Urban) and of CRZ - III (Open Space Area / Rural) thereby affecting the health of the residents of this metropolitan city. With this Buffer Zone there will be imbalance of FSI.

c) **Tributaries and Nallah** - There are many water inlets shown as a Water Body (Creek) CRZ - IV B shown wrongly. They are actually a very small

Nalla's/Tributaries/Effluents that flow into creeks. All these water bodies are not creeks.

d) **Bay** - Water body near the Haji Ali Tomb, shown as Sea. From the CZMP map itself it can be seen that it is a Bay and not Sea. This Haji Ali Bay is much smaller than the Mahim Bay & the Back Bay. The area of Mahim bay is approximately 06.68 Sq.Km. & it's buffer zone proposed is 100 meter wide, the area of Back Bay is approximately 10.75 Sq.Km. & it's buffer zone is also proposed 100 meter whereas the area of Haji Ali Bay is approximately only 00.40 Sq.Km. and it's buffer zone is proposed 500 meter wide. This is contrary and shown wrongly, arbitrarily.

e) **Open Spaces & CRZ I** - Nallahs entering into the creek are carrying waste water from the city into the creek. These are wrongly being shown as part of the creek.

f) Many encroached spaces which are largely occupied by huts and encroachments are shown as open spaces in the CRZ map and classified as Category I. This is done based on the proposed reservation shown on DP Plan of Mumbai. CRZ map has to reflect the real structures and ground reality and all land which are occupied by structures, huts etc, even if they are shown reserved on DP plan, should not be marked as open spaces or categorized as category I but should be marked as Category II and should be shown as already Developed Property.

All these proposals on CZMP Map are shown wrongly which is unfair & unwarranted.

Therefore, we have strong objection for the same.

Therefore, without prejudice to our contention it is suggested that,

- i) Delete the CRZ proposed on the Landward side of the Existing Roads all over Mumbai Metropolitan City.
- ii) Creek Buffer Zone of 100 mtr. wide CRZ - II (Urban) on private lands which was earlier 50 Meter wide as per earlier sanctioned CRZ Survey Map of Greater Mumbai now should be curtailed to less than 50 Meter which we suggest to 25 meter wide Buffer Zone on the plan of CZMP of Mumbai.
- iii) To delete all Tributaries and Nallahs i.e. water inlets & Nallahs - CRZ - IV B as the same are actually very small Nallas / Tributaries / Effluents that flows into a creeks having very small widths shown on the plan attached herewith marked as "PLAN - A" and,

- iv) Bay - Water body shown near the Haji Ali Tomb as "Sea" to be qualified as "Bay" and it's 500 Meter wide Buffer Zone to be curtailed to 50 Meter wide Buffer Zone similar to Mahim Bay & Back Bay.
- v) Open Spaces in CRZ I - should be shown as CRZ II as they have structures of them.

It is requested to kindly take into consideration the above view points and Suggestions / Objections on your record.

We would like you to kindly issue suitable instructions & modifications to the concerned officials to address / examine the apprehensions and objections / suggestions while framing and before submitting the proposal to the final sanction to the Draft CZMP of Mumbai.

We desire personal hearing in the matter and are awaiting your further communications in this regards.

Thanking you,

Yours faithfully,
For CREDAI-MCHI



Dharmesh Jain
President



Nainesh Shah
Hon. Secretary



S. S. Hussain I.A.S (Retd.)
Chief Executive Officer

Copy for information & necessary action:-

Shri Satish Gavai (I.A.S.)
Additional Chief Secretary,
Environment Department and
Chairman, MCZMA,
Government of Maharashtra,
Mantralaya, Mumbai - 400 032.

for 12.5.17
आवक सिविक
पर्यावरण विभाग
मंत्रालय, मुंबई-४०००३२

Encl: i) Plan - 'A'.