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To,

Shri Kinjarapu Rammohan Naidu,

Hon'ble Minister for Civil Aviation,

Ministry of Civil Aviation, Rajiv Gandhi Bhavan,
Block B, Jorbagh Safdarjung Airport Area,
New Delhi 110 003

Subject: Request for resolution of HF Transmitter and Receiver Issues Affecting Building Heights and Obstacle Limitation Surface Calculations

Respected Sir,

On behalf of CREDAI-MCHI, I am writing to bring to your esteemed attention critical issues impacting building heights in Mumbai due to limitations imposed by the presence of HF Transmitter (Tx) and Receiver (Rx) equipment and discrepancies in the calculation of distances under the Obstacle Limitation Surface (OLS) guidelines.

1. HF Transmitter and Receiver Relocation:

The current restrictions on building heights in Juhu and Dahisar, as dictated by GSR 770(E), stem from the HF Transmitter and Receiver equipment. These restrictions are significantly affecting development projects and urban planning in these areas.

On 12th July 2024, the Honorable Chief Minister of Maharashtra, Hon. Mr. Eknath Shinde, formally requested the relocation of the HF Transmitter and Receiver stations from Dahisar and Andheri to a new site in Gorai identified by MCGM. The Airports Authority of India (AAI) is expected to hand over the possession of this land for the development of a Garden/Park.

The Expert Committee, chaired by Fali Major (2021-22), in its Recommendation No. 4, specifically addressed the necessity of relocating HF Tx and Rx Systems outside the main city areas to avoid height restrictions on buildings and ensure the quality of HF signals. The Commissioner of MCGM has committed to providing suitable land that meets operational requirements for this relocation. It is imperative that this recommendation is followed up by the competent authorities to resolve the issue expeditiously.

2. Obstacle Limitation Surface Calculations:

The calculation methodology for distances under the OLS guidelines dated 26th March 2015 and the aeronautical study guidelines dated 3rd July 2020 has been a point of contention. The current formula does not align with the ICAO OLS methodology, leading to non-uniformity in the transitional and conical surfaces. This contradiction is at odds with the consensus of the Appellate and Expert Committee that emphasizes a "gradual and uniform" increase in height as the distance from the Airport Runway End increases.

The DGCA's observation and recommendation report dated 18th September 2018, based on the meeting held on 7th August 2018, acknowledged the logical interpretation by CREDAI to consider the distance of obstacles from the transition surface on a radial basis from the runway center extremity. This interpretation ensures that obstacles remain below the gradually rising surface, thereby adhering to safety and operational standards.

Maharashtra Chamber of Housing Industry

Maker Bhavan II, 4th Floor, 18, V. Thackersey Marg, New Marine Lines, Mumbai - 400 020.
Tel: 42121421, Fax: 4212 1411/407 Email: secretariat@mchi.net Website: www.mchi.net

CREDAI-MCHI CHAPTERS : THANE | KALYAN-DOMBIVLI | MIRA BHAYANDAR | RAIGAD | NAVI MUMBAI
|
BHIWANDI | PALGHAR BOISAR | SHAHAPUR-MURBAD | URAN-DRONAGIRI |
VASAI VIRAR | ALIBAG | KARJAT-KHALAPUR-KHOPOLI | YOUTH NMR

The aforementioned issues were presented to the Joint Working Group, chaired by Member Air Navigation Service Mr. Suresh, on 1st May 2024 at Rajiv Gandhi Bhavan, New Delhi.

Request for Your Esteemed Intervention:

We humbly request your intervention to expedite the resolution of these matters. The relocation of the HF Transmitter and Receiver stations and the alignment of OLS distance calculation methodologies with international standards are crucial for the planned urban development and the safety of air navigation in Mumbai.

Your support in directing the concerned authorities, including AAI and MCGM, to work closely on these issues will significantly aid in overcoming the current challenges and fostering an environment conducive to sustainable urban growth.

We remain optimistic about your favorable consideration and are available for any further discussions or clarifications needed.

Thank you for your time and attention to this critical matter.

Yours sincerely,
For **CREDAI-MCHI**



Domnic Romell
President



Dhaval Ajmera
Hon. Secretary

Annexure: Letter from Shri Eknath Shinde, Hon'ble Chief Minister of Maharashtra Dated 12 July 2024

CC

- 1) Ms. Rubina Ali - Joint Secretary,
Ministry Of Civil Aviation,
Rajiv Gandhi Bhavan, New Delhi**

- 2) Shri Boman Irani
President
CREDAI National**

Eknath Sambhaji Shinde

**Chief Minister
Maharashtra**



CMO/Admin Sec./Outward No. 299/2024

**Mantralaya
Mumbai-400 032**

12 JUL 2024

Dear Shri Naidu ji,

Sub : To issue directions to shift H.F. receiving station from Dahisar, Andheri and to hand over the possession of land of AAI for the purpose of Garden /Park (ROS1.5) in Dahisar East, R/N Ward to BMC.

Ref. :

1. DO Letter issued by BMC u/no. MCP/2309 dtd.22.12.2022 to Chairman, AAI
2. DO Letter issued by BMC u/no. MCP/2309 dtd.23.12.2022 to Addl. Chief Secretary, UD-1, GoM
3. D.O. letter from AAI u/no. NM-19049/33/2015-CNS-O&M dtd. 18.04.2023
4. Letter from Hon. Chief Minister of Maharashtra No. TPB-4323/ CR-104/2023/UD-II dated 6.09.2023 to Minister, Civil Aviation, GOI

Sir,

Kindly refer to the above mentioned letters.

The land under reference, situated at Dahisar is under possession of Airport Authority of India (AAI). The approximate area of Dahisar land is about 58.00 Acres. The Union cabinet chaired by the Hon. Prime Minister had given its approval to transfer of 40 Acres out of 58.00 Acres of AAI land at Dahisar to MMRDA for its metro car shed, swapping it with 40 acres of State Govt. Land at Gorai. However, due to revised design of the project, MMRDA doesn't need the plot under reference (Dahisar) for Metro car shed. Instead, BMC vide DO letter u/no. MCP/2309 dtd. 22.12.2022 has requested UDD, GoM for taking over the AAI land by BMC at Dahisar East for developing Garden/Park. Additionally, BMC vide DO letter u/no. MCP/2309 dtd. 22.12.2022 has requested AAI to handover vacant possession of Dahisar land to BMC by demolishing /dismantling the existing Transmission tower / high frequency communication equipments.

Tel. : 022-2202 5151/2202 5222, Fax : 022-2202 9214

E-mail : cm@maharashtra.gov.in, Website : www.maharashtra.gov.in

With reference to the above subject,, AAI vide letter u/no. NM-19049/33/2015-CNS-O&M dtd. 18.04.2023 informed to BMC that the transfer of Dahisar land where AAI's high frequency receiving station is located was approved by the Union Govt. to MMRDA for specific purpose of metro car shed with the approval of the Union Cabinet in its meeting held on 23rd August, 2017. Accordingly, AAI can transfer land at Dahisar to MMRDA and that too only for the specific purpose of creating metro car shed and any change with respect to transfer either to agency other than MMRDA or purpose would require fresh approval of Union Cabinet. Therefore, it would be appropriate if the present request is taken up with Ministry of Civil Aviation.

Thus, BMC vide letter u/no. ChE/DP/3870/WS dtd. 22.05.2023 have requested Govt. in U.D. Dept., GoM to take up the matter with Ministry of Civil Aviation for taking over the AAI land by BMC at Dahisar East for developing Garden/Park. Hence this request letter for your kind consideration and appropriate action for permitting hitherto sanctioned swapping between AAI land at Dahisar East and BMC land at Gorai, for the purposes of development of Garden/ Park by BMC instead of for metro car shed for MMRDA. Needless to say all other conditions of transfers are to remain unaltered.

I would further like to bring to your kind notice another dimension of the proposal. As per Ministry of Civil Aviation (Height restriction for safeguarding of Aircraft operation amendment Rules-2020), there are restrictions on heights of building in surrounding area of the transmission station at Juhu and Dahisar. Your kind-self is fully aware that Mumbai, India's bustling metropolis, faces significant land constraints that pose numerous challenges to its urban development and expansion. As one of the world's most densely populated cities, Mumbai grapples with a limited land area amid a surging population and increasing demands for infrastructure, housing, and commercial spaces.

Height restrictions on various buildings severely restrict development of scarce lands to fullest potential and forbid development of lakhs of square meters of land. It is thus desirable that transmission towers along with high frequency communication systems may be be considered for relocation if such relocation does not interfere with this system's essential operation. If this is achieved, then without any compromising any operational and safety considerations of operations of civil aviation, which itself is of paramount importance for all of us, growth of the city in the vicinity of Dahisar may be given an impetus.

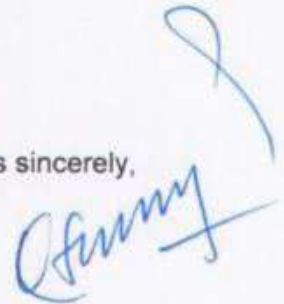
Besides this, there are thousands of structures, buildings in old dilapidated condition in region surrounding current location of said tower and equipments wherein lacs of people are residing. There are number of slum structures too. Redevelopment schemes for slums as well as old dilapidated buildings are becoming unviable due to height

for slums, as well as old dilapidated buildings are becoming unviable due to height restrictions in the surrounding area resulting in stoppage of Redevelopment activities, thereby depriving resident of safe shelters to live in.

I, therefore request you to shift HF communication system from Juhu and Dahisar to elsewhere preferably at Gorai. Earlier Central Government had given approval for shifting of HF receiving station at Dahisar and to transfer land at Dahisar to MMRDA. Now request is for transfer of Dahisar land to BMC to Develop Garden / Park on it in lieu of same alternate land at Gorai, also effecting the transfer of above mentioned equipments as per original sanction.

An early action into this matter is prayed for.

Yours sincerely,



(Eknath Sambhaji Shinde)

To,

Shri Kinjarapu Rammohan Naidu,
Hon'ble Minister for Civil Aviation,
Ministry of Civil Aviation
Rajiv Gandhi Bhavan,
Safdarjung Airport,
New Delhi - 110 003.