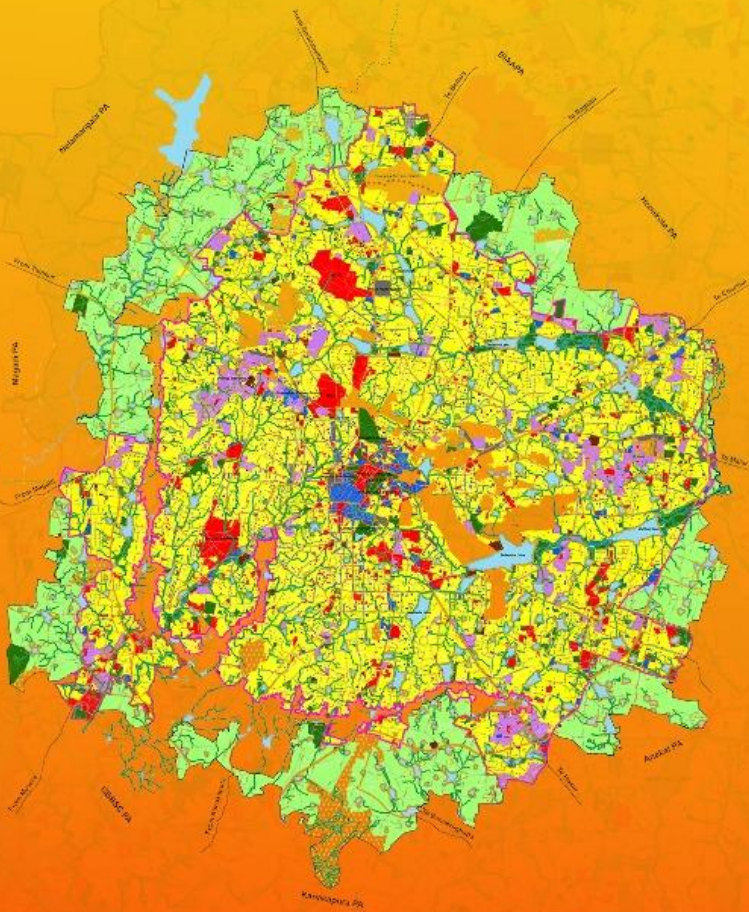


**SUBMISSION ON THE REVISED MASTER PLAN 2031  
TO  
BANGALORE DEVELOPMENT AUTHORITY**

**Bringing Back a Bengaluru of Kempe Gowda's Dreams**

**#ReclaimingBengaluru #NammaBengaluru**



**RAJEEV CHANDRASEKHAR**  
MEMBER OF PARLIAMENT

**23.01.2018**



# BANGALORE DEVELOPMENT AUTHORITY

T. Chowdaiah Road, Kumara Park West, Bangalore - 560 020

No.: BDA/TPM/RMP-2031/1535//2017-18

Date: 24.11.2017

## PUBLIC NOTICE

### **PUBLICATION OF PROVISIONAL REVISED MASTER PLAN-2031 (RMP-2031) FOR BENGALURU LOCAL PLANNING AREA UNDER SECTION 13(1) OF THE KARNATAKA TOWN AND COUNTRY PLANNING ACT, 1961**

Revised Master Plan-2031 for Bengaluru Local Planning Area as required under Section 13(D) of the Karnataka Town and Country Planning Act, 1961, is provisionally approved by the Government vide G.O. No.: Na Aa Ee:516:BEM Aa Se Bengaluru, dated 22.11.2017 and a copy of **Master Plan is available for inspection at Banashankari 2nd Stage, BDA Commercial Complex, 1st Floor, Bengaluru during office hours from 25.11.2017 to 23.01.2018.**

Suggestions/Comments if any from the general public in respect of Revised Master Plan-2031, may be submitted **within 60 days** from the date of publication of this notice by muddam or by Regd. Post to **Town Planner Member, Room No.210, 2nd Floor, BDA Commercial Complex, Banashankari 2nd Stage, Bengaluru-70** or through e-mail **Suggestions.rmp2031@gmail.com** Format for suggestion/objection may be downloaded from BDA website **www.bdabangalore.org** Suggestions/objections received after objection period will not be considered.

**Sd/- Commissioner, BDA, Bengaluru**

# Submissions on Revised Master Plan 2031

## Introduction

Ever since I was given an opportunity to serve as a Member of Parliament representing Bengaluru district, I have been suggesting, urging and then demanding a comprehensive plan to guide Bengaluru's rapid growth. The justification for Planning when I first made it in 2009 is the same as it is today. Growth without planning is a recipe for Urban chaos. Urban chaos is in turn a breeding ground for rampant misuse of Administrative discretion and that in turn fosters a culture of corruption and nepotism.

This government came into office in 2013 yet in the last 5 years it has governed Bengaluru without any semblance of planning, despite every justification and need for it. The lack of planning has meant that over 9000 Crores spent every year by the BBMP and further money spent by other Government agencies have been spent on various "projects" – none of them being part of any overall solution to any of the big problems facing the city which are – Transportation, Water bodies, Solid waste Management, Water and Sewage, Urban poor housing, Health and Education etc. Proof is simple – that five years on and after spending over Rs 50,000 crores in Bengaluru - not one of the city's and citizens problems have been solved or even improved from 2013. Worse, in many areas problems have worsened making the lives of citizens especially the poor much worse off.

Namma Bengaluru requires an urgent move from the current unplanned, often corrupt, citizen opposed, chaotic development into a more planned, transparent development with citizens support. So, a plan is welcome but the current RMP2031 proposed by the BDA is unacceptable and suffers from many shortcomings legally and from the point of its real objectives.

### **1. About RMP 2031 – MPC is the only constitutionally mandated body for Metropolitan planning.**

RMP 2031 is supposed to be comprehensive document plan which provides the broad framework and direction for the growth and development of the city for next 15 years. The 74<sup>th</sup> amendment of the Constitution refers to this and mandates MPC as the body to do this. The 74<sup>th</sup> amendment was the one created and devolved power to Urban Local bodies and City governance.

BDA is neither authorized to nor does it have the credibility to do a Credible plan, especially since it has a long track record of dubious financial and land decisions. It is an extremely non-transparent organization as was made evident during the SteelFlyover project Bypassing Environmental approvals, Fixed public consultations of the SteelFlyover. Consultations were rushed, responses fixed and very little data and information was made public and even the contracts were awarded. Only judicial intervention exposed the actions of the BDA. There is very little transparency and disclosure around the slew of projects being executed at the current time by BDA and other agencies on Need,

costing and financing. Most projects of the BDA are heavily gold plated and there is a legitimate concern that any planning from BDA would be driven by extraneous considerations rather than planning for development of the city. Given this track record of this agency, it cannot in good faith discharge any function of planning or indeed anything that involves public moneys or assets.

For most of the period of this government the MPC was not constituted. It was constituted after a legal challenge was mounted. Even after it was constituted by the Government of Karnataka, it has been convened by its Chairman the Chief Minister infrequently, often at short notice without any agenda papers and has conducted no meeting or deep discussions of the planning requirement of the Metro region and city. Furthermore, MPC has no urban planning and Technical advisors nominated to it even today 5 years after the GoK took office.

Thus, this RMP cannot be sustained and must be replaced with one that the MPC considers after the MPC is reconstituted and meets regularly every month for a period of at least 6 months with all citizen representatives participating.

## **2. The BDA RMP is only a Land Use Conversion Plan masquerading as a Regional Master Plan – All other plan elements are only suggestions and not obligations of Government**

As I have mentioned earlier, BDA lacks the credibility and Integrity to create a master plan that involves balancing the interests of citizens and other commercial entities. The RMP is expected to have its focus on the interests of citizens/Residents.

The proposed BDA RMP is a document that contains many references to various issues that concern residents and families living in Bengaluru. But on these vital issues of Infrastructure and Services, there is neither a timeline to deliver on them nor any glimpse into how these would be practically financed and built. But the only one issue that the BDA RMP ensures will be acted upon is the recolouring of land parcels – ie permitting large scale commercial development of land currently earmarked for non-commercial purposes and for densification by increasing the FSI in many areas.

To be explicit and clear – the RMP must permit land use conversion ONLY AFTER the following is finalized and approved

- a. Public consultation and approval of people of the ward for the development plan and change of land use.
- b. And after Government/BBMP approval of finances and projects to create the service Infrastructure requirements (Roads, Water, Sewerage, Electricity etc) that will be required as a result of the development as approved by public consultation.
- c. RMP must contain all elements of Infrastructure and Public services that need to be added and expanded as population increases. The financial

and investment planning for such a development roadmap must also be available in summary form.

A good example of not following this sequence and ensuring these conditions precedent to land use conversion is all those complexes/townships that have come up in and around Bengaluru without any basic infrastructure of water, sewage, garbage and even roads. The impact of this kind of development may be invisible but very real – as gallons of sewage and waste are being pumped either into the ground or into water bodies. Water is being used from borewells which are dramatically lowering the water table etc. This cannot be what is part of a long-term plan for city.

A copy of PlanBengaluru2020 – a document that was developed in 2010 is attached in **Annexure A** as a reference on what the basic outlines of a plan must contain. I refer you to the foreword of that document in particular.

Letters from then Urban Development Minister about PlanBengaluru2020 is **Annexure A1.**

Letter to Chief Minister about PlanBengaluru2020 given in 2014 is **Annexure A2.**

### **3. Bengaluru needs New Legislation enshrining principles of Citizen Participation, Accountability of Government agencies and officials, Transparency in Spending and Contracting - KTCP Act needs to be amended or scrapped.**

The crux of the problem is that the power to prepare Master Plans by parastatals, designated as Planning Authorities under the Karnataka Town and Country Planning Act, 1961 was not amended or taken away when the MPC and DPCs were given constitutional status in 1992. Article 243ZF of the 74<sup>th</sup> CA clearly stated that any legal provisions, which are inconsistent with the provisions of the 74<sup>th</sup> CA shall cease to be valid at the end of one year from the commencement of the 74<sup>th</sup> CA, i.e. 1994, unless amended or repealed earlier.

The KTCP Act has not been amended to take away the planning powers of BDA and transfer them to the Metropolitan Planning Committee, with regard to Bengaluru, and to the District Planning Committees in the case of other areas. Hence as per Article 243ZF of the 74<sup>th</sup> CAA, the planning powers of BDA for Bengaluru Metropolitan Area (BMA) are automatically void and unconstitutional and the only planning powers rest with the MPC. There is an understandable reluctance for the Government of Karnataka to convene the BMPC. It has MPs, MLAs and Corporators from various parties – it must have experts nominated to it. All of which would make the process of planning more transparent and with more questions than the BDA route. But the law is the law and political inconvenience is no excuse for subverting a constitutional body or process.

**A copy of the Draft BMRGA bill prepared in 2010 is attached (Annexure B)**

All this while the basic principle of accountability of Government servants is missing in Bengaluru. Whether it is deaths due to negligent public works or it is negligence that causes fire hazards that result in deaths or Encroachment of

public assets like land, lakes, Rajakaluve etc. Accountability of Government servants in any such cases must be a must and law should ensure that.

#### **4. RMP must be accompanied by Deep Governance Reforms in how the city and its various agencies operate and function.**

Bengaluru as a city is the Economic engine of the State of Karnataka and indeed India. Its governance model today lacks transparency and fosters rampant corruption and in the long term this lack of Governance will cause irreversible damage to the city, its people and the state. Reversing this damage will cost much more and will leave that cost as a liability on future generations of Bengalureans. So, the answer is better Governance now.

Governance reforms are required in how public money is spent, contracts are awarded on one end of spectrum to involving citizens in ward committees and development planning on the other end of the spectrum of changes required. This whole issue of Governance reforms requires a detailed and transparent public discussion.

BDARMP has borrowed some ideas from earlier reports like ABIDe PlanBengaluru2020 (PB2020) but RMP does not mention any commitment or legal compulsion to implement these ideas. RMP neglects citizen's involvement in planning which PB2020 proposed 8 years ago in 2010.

PB2020 is the only plan prepared with 60,000 citizen inputs. PB 2020 has addressed every element of planning and development from Citizen Centric Governance, Traffic Management & Transportation, Education, Health, Urban Poor, Environment & Sustainability, Lakes & Water bodies, Waste Management, Power, Economy, Tourism, Secure Bengaluru, Heritage and City Facilities

The principle objectives for PlanBengaluru2020 were threefold – to create a comprehensive integrated region wise plan to address the region's future growth and all its consequent issues including its future social, cultural and economic needs; to develop a roadmap for a responsive administration of such a plan and to continuously improve it; and to ensure that citizens remain the primary stakeholders in this transformation. If these objectives are met, then we will have created the premier city in India, and a global metropolis at par with the best-liked cities of the world.

As highlighted by me in 2009 in PlanBengaluru2020 Foreword, Citizen-centric Governance must form an important foundation for the governance of our city. Following section which I said then holds relevance even today -

*In addition to planning for growth of the city and region in an orderly fashion, we also need reforms in Governance – with a focus on transparency and citizen involvement in various aspects of neighborhood life. In every successful modern city, citizens have a very powerful voice in the destiny and direction of development around their homes and places of work. For Bengaluru too, we must want the same.*

*Bengaluru has a long history of very livable residential areas, but the renowned feel of a comfortable and attractive city is now at risk. We can only hope to restore this by promoting community engagement on key issues and challenges, and developing the city based on the priorities expressed by residents. There are many advantages to building and nurturing this sense of community – a feeling of belonging, management of complex problems, and the resulting sense of safety and security while pursuing a multitude of dreams.*

*Yet another area of concern is the decline of the various City Government agencies and their inability to adapt to the challenges of growth. Managing various planning and administrative functions requires skill as well as continuous attention to improving the capabilities of public institutions, and on this count Bengaluru (like so many other Indian cities) has not acted with due alertness. A modern – and still growing - city needs skilled administrators who are equipped with the tools and technologies for its management. A focus on developing a cadre of dedicated city managers, and on building robust institutions that focus on residents' welfare through their administrative work, is much needed.*

Bengaluru is in crisis and despite the RMPs of 1995, 2005 and 2015, the biggest flaw in the master plan is that it has not evaluated the reasons for the failure of previous master plan. The planners did not consider the portions of RMP 2015 which were not implemented and the reasons behind it. It has also failed to analyse the, organisational structures that were ensure successful implementation of the previous plan.

What is the institutional and legal framework to implement this plan? The draft plan does not mention any commitment or legal compulsion to implement these ideas. In addition, many acts regulating BESCO, BWSSB and others also need to be amended to ensure they will align their plans to work in conjunction with the RMP.

**5. RMP must clearly and separately Include Lakes Forest lands, its management and the consequences of encroachment must be made punitive**

Bengaluru has several thousand acres of forest land in and around the city. For many years improper surveying and inadequate prosecution of encroachment has caused challenges to this. This Forest land is protected by law and unlike the widely encroached Gomala land the state of our Lakes, these forest lands must be carefully mapped and preserved and encroachment prosecuted.

**6. RMP must have a Credible Financing Plan and Roadmap that transparently lays out the impact on taxation and other levies on citizens, enterprises and inflation of costs of public services**

This BDARMP is a document that lacks credibility because it has no credible financing plan. That is dangerous because it permits the creeping entry of so called PPPs which are always one-sided contracts for crony businessmen. A strong well-planned financing plan for city's development is an insurance policy against fiscal profligacy and gold-plated projects on one hand and misleading PPPs on the other hand.

BDA has neither the capability nor credibility to do any such financing plans. Its own finances are hazy transparent and leaky. There are many instances of BDA financial scams in the public domain for all citizens to read and be wary about

## **Summary**

I am very sure that the Government of Karnataka would like to hastily approve this BDA RMP (at the fag end of its term) so that it can execute the land use changes before the elections which can be implemented immediately – consequently benefiting many builders and landlords with not even the slightest benefit to any citizen or resident – nor making the slightest change in the situation of any of the problems and issues facing the city.

The BDARMP proposed by the Government is based on the simple assumption that making and promising many things to the people of the city will distract them away from its sole and only purpose – that of Land use conversion with no obligation on the BDA or indeed the GoK to implement any of those things mentioned in the Vision.

Further the lack of any real assessment of financial implications on the basket of ‘visions’ will mean that these visions will remain just that. Karnataka as a state has many financial needs for its farmers, for the under developed North Karnataka region etc so the assumption that these grandiose plans will be financed by the state Govt is illusory. That is precisely why a practical financial plan and availability of resources must guide any RMP as much as the RMP decides the financial requirements for developing the city.

Lastly, the pathetic condition of Namma Bengaluru is because of a culture of rampant corruption – where the city and its resources are being exploited by a few without any concern or care for the 1 crore who live and work there. Unless there is a serious relook at the Governance and coordination of Government agencies any plan will fail.

I oppose this draft RMP on all the above grounds.



**Rajeev Chandrasekhar**  
Member of Parliament



## **Further Objections to RMP 2031 (submitted by various Citizens/Citizen groups)**

The BDA should consider the population projections of Bengaluru for the year 2031. But in its projection, they claim that **Bengaluru's population would be 2.3 Crore by 2031**. This means the rate of population growth would be 5.6 percent annually until 2031. **But data from experts reveals that the rate of population growth between 1997 and 2007 was 4.5% and between 2007 and 2017 was around 3.8%**. This indicates a decreasing growth and thus a population far less than the one projected by the BDA. This highlights the BDAs failure to make proper assessments and moreover, they do not state the reasons envisioned for such a drastic change in population.

### **1. Land Use (Volume 3 Table 5.1 ELU comparison to Table 10.1 PLU) –**

RMP 2031 is filled with striking inconsistencies between The Existing Land Use (ELU) and Proposed Land Use (PLU).

- a. The PLU has increased the area of land by 80 sq. km to accommodate the rapid growth of population, but there is no explanation as to where the BDA will get 80 sq. km for urban sprawl expansion.
- b. Commercial zone in ELU is 38.28 sq km (Table 5.1) which is shown reduced to 24.74 sq Km in the PLU (Table 10.1). Given the projected increase in population, reduction in commercial space appears unviable.
- c. Furthermore, the ELU keeps the forest area to 27.53 sq. km while the PLU shows only 5.7 sq. km of forest cover. How can this be justified when Forests are under the jurisdiction of the Forest Department and when the city is in a midst of an environmental crises with loss of green cover and choking pollution levels. The government must first denotify the forest land and only later the forest tag can be removed.
- d. There are many cartographic errors in the map in terms of missing streets, lakes, CA sites and parks. There is no explanation as to why the projected maps have wiped away these essential elements. Under the proposed land use analysis of Bellandur-Haralur area, of the 9,555-acre area available for development, 909 acres are water bodies, while 1,030 acres are reserved for buffer zones. One of the roads has been proposed on a Rajakaluve (storm water drains) of Kasavanahalli lake.
- e. Vacant land 304.82 sq km in the ELU proposed to be eliminated in the PLU. There does not appear to be 25 % vacant land in the Bengaluru LPA. Where exactly is this land and what is the break up between the various ELU maps must be explained clearly.

### **2. Traffic & Transportation**

In a chaotic city whose population is expected to shoot up to more than 2.3 crore by 2031, BDA in RMP-2031 now proposes two new Ring Roads in Bengaluru. Serious Objections need to be raised on this front as the previous RMP calls for a PRR that is yet to be implemented. Plus, the land notified for PRR by the BDA has left small and marginal land holders in the peripherally areas of the city in Limbo. Plus 8000 households have been given notifications of 1920 acres of lands on the pretext of connecting various parts

of the city. But this again is a ploy to confiscate land from the Citizens and divert it to big companies for development projects.

Citizens have been put to misery because of lack of Statutory Planning and accountability in Bengaluru's development plan. Lakhs of people have been affected- farmers who tilled the land can neither continue with agricultural as they fear land will be acquired anytime nor can they dispose it off because of the notification.

The plan talks about 15000 buses by 2031, there no mention on how it will accommodate so many buses. Land use has an impact on trips made both in terms of the number and the length. It will also impact the choice of mode of transport. But that correlation has not been made at all, rendering it ineffective to predict the scenarios later. The strategy also does not make any assessment of accessibility and viability of transport modes for the economically weaker sections of society, even as the city has seen multiple protests over the fares of both BMTC and metro being unviable.

### **3. Water and Sanitation**

The water woes of the city in 2031, with over 2.3 Crore people, will be much worse than what the draft RMP 2031 predicts. RMP has proposed meeting the projected demand of 5,340 million litres per day mostly by diversion of water from reservoirs located at long distances such as Yettinahole, Linganamakki and Hemavathi. This plan is highly impractical and reckless which will exploit surface and ground water. The draft plan heavily relies on recycled water for demand reduction, it is silent on the sewerage network and Sewage Treatment Plant (STP) infrastructure needed by 2031.

Many apartments and commercial buildings don't have a functioning STP, because of which many lakes and water bodies are highly polluted. BDA has planned and identified several areas for building corridor roads as a part of making an integrated transport system. Some of these roads are scheduled for a 12-18-meter radius from the lakes. RMP blatantly violates the 75-meter buffer zone set by the NGT. The planners of RMP have not only violated NGT order, they will also be the reason for unwanted decoration of lakes with roads causing a great loss of biodiversity and exposing the people of Bangalore to problems, such as health, shortage of drinking water, ground water and vector borne diseases.

### **4. Solid Waste Management**

The fulcrum of proposed Municipal Solid Waste management in 2031 relies heavily on Decentralized Management of Waste. However, the recent fire in Bellandur lake and inspection by various lake groups under the banner of United Bengaluru across the city shows how lakes are continuing to be the recipient of Municipal Solid Waste and Construction and Demolition Debris. Despite all the theories being projected, the situation on ground gives us the real picture. While the city is struggling to manage the much exaggerated 4,000 tonnes, it will drown if 13,911 tonnes of garbage is generated every day. Solid Waste Management contracts continue to be the honeypot for politicians and contractors who make money in every aspect of Garbage Management.

## 5. Legal Obligation from Parastatal Agencies

The sectoral plans of RMP 2031 makes recommendations **with no legal obligations from parastatal bodies (like - BBMP, BMRCL, BWSSB, BMTCL, KIADB) to provide the required services and timely implementation of sectoral plans.** If there is no legal obligation from these parastatal bodies, it will be plans which will be on paper only. It is imperative to obtain legally binding affidavits from all the parastatal agencies to guarantee the services and timely transparent implementation of sectoral plans outlined in RMP - 2031 and incorporate the same in the final document. RMP-2015 failed miserably for lack of cooperation from parastatal agencies.

## 6. Conservation and Protection of Heritage

The draft plan has introduced Vikasa Soudha on the top list of heritage buildings — a property that is nowhere close to be a heritage structure. Perhaps, it's only claiming to fame it's a replica of the 60-year old seat of power, Vidhana Soudha. In fact, Vikasa Soudha was built after bringing down the Government Press building which was a heritage structure. Built during the chief ministerial tenure of S M Krishna in 2004 at a cost of Rs 150 crore, Vikasa Soudha is on a 7.5-acre plot and has a built-up area of 6.24 lakh sqft. The planners have contradicted their own definition of heritage building, which is mentioned in the RMP 2031: "A building possessing architectural, aesthetic, historic or cultural values". Vikasa Soudha does not qualify into this bracket. Vikasa Soudha is just a replica of Vidhana Soudha and it cannot be merely classified as heritage just because Vidhana Soudha falls in that category. At the same time, the Government has turned a blind eye to iconic heritage structures such as the Vani Vilas hospital. The recent demolition of the Krumbiegal Hall in Lalbagh shows that Heritage protection must be given a lot more serious attention and focus must be given to strengthen institutions which can protect heritage of our city.

- a. The composition of **Heritage Committee** should have equal citizen participation. The total number in the committee be increased to 12 to have adequate representation from both the bureaucracy and citizenry.
- b. The committee members should not have conflicting private commercial interests that fall under the jurisdiction of the Heritage Committee. If that is the case, the said member will restrain himself/herself from the committee and its proceedings.