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To,
Chief Engineer (Development Plan)
Municipal Corporation of Greater Mumbai
5th Floor, Annexe Building,
Municipal Head Office,
Mahapalika Marg, Mumbai – 400001

09 October, 2025

Subject: **Suggestions/Objections to Draft Zonal master Plan of Eco-Sensitive Zone (ESZ) for the Sanjay Gandhi National Park**

Dear Sir,

This is with reference to the public notice dated 09 September 2025 issued by the Municipal Corporation of Greater Mumbai, **inviting objections and suggestions to the Draft Zonal master Plan of Eco-Sensitive Zone (ESZ) for the Sanjay Gandhi National Park.**

We, NAGAR, are writing to put on record our Suggestions/Objections to the above-mentioned proposed regulation as follows:

1. Objection to the designation of the Natural Areas located northwards of Vihar Lake as ESZ II

According to the *Development Plan (DP) 2034* and *DCPR Part VII, Clause 3.7*, these areas have been explicitly designated as **Natural Areas (NA)** (*Annexure 1*). The permissible activities in such zones are strictly limited to eco-sensitive uses such as boardwalks in mangroves, trekking facilities, public sanitary conveniences for visitors, and sewerage pumping stations.

In contrast, the **Draft Zonal Master Plan for SGNP** classifies the same area as **Eco-Sensitive Zone II (ESZ II)** (*Annexure 2*), permitting extensive built development, including residential, commercial, hospitality, educational, healthcare, and religious facilities, among others. These provisions are in **direct conflict** with the protective land-use regulations stipulated under *DP 2034*, thereby undermining the ecological intent and conservation objectives of the Natural Area zoning.

It is critical to emphasise that the said region serves as:

- An **eco-sensitive zone**, supporting rich biodiversity that requires strict conservation.



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- A **natural drain and catchment area** for Vihar Lake, which plays a vital role in maintaining the ecological and hydrological balance of the region. (*Annexure 3*)

Permitting built development in this zone will have severe and irreversible consequences, including:

- **Depletion of biodiversity** and fragmentation of ecologically sensitive habitats.
- **Increased human–wildlife conflicts**, due to disturbance of natural habitats.
- **Disruption of natural drainage and catchment functions** of the Vihar Lake basin, heightening the risk of flooding in adjoining urban areas.

We strongly recommend that the Natural Areas north of Vihar Lake continue to be protected under the **Natural Area (NA)** land use classification of DP 2034, and that the Draft Zonal Master Plan be revised to designate them as ESZ III - prohibiting all forms of built development in this sensitive zone.

2. An incomplete and inconclusive survey adopted to inform the draft Masterplan

4.4: “Additionally, areas with security concerns, such as Appapada, presented significant safety challenges due to high crime rates and political instability, making fieldwork hazardous. Regulatory barriers and permit restrictions also affected the survey. Despite obtaining prior permits, access to certain sites was denied, leading to delays. Restricted entry was encountered in locations such as Ram Prasad Chawl (Shivaji Nagar, Kurar Village), Hanuman Pada (Mulund-West), and Naigaon-Sasunavghar (Vasai-Virar) due to expired police permission letters and ID cards. Despite these challenges, efforts were made to mitigate limitations through adaptive methodologies and multiple survey techniques to ensure robust biodiversity assessments.”

As referenced above, the report itself acknowledges that the surveys undertaken were severely constrained due to safety challenges, regulatory barriers, and restricted access to critical sites. In light of these limitations, the surveys conducted are inadequate and cannot serve as a reliable basis for delineating maps or identifying areas for rehabilitation.

Such inadequacy poses a serious risk: without comprehensive and verifiable surveys, it is impossible to accurately determine eligibility for rehabilitation, preservation, or relocation of settlements, as well as to identify encroachments. Reliance on incomplete or inconclusive survey data undermines the integrity of the planning process and jeopardises ecologically sensitive and high-value land.



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It is therefore imperative that comprehensive, verifiable, and methodologically robust surveys be undertaken prior to the preparation or approval of any Draft Master Plan.

NAGAR wishes to place on record all the above Suggestions and Objections which have been given in the best public interest. We hope you will consider the above-mentioned principles and recommendations, and we trust that the BMC will take cognisance of these in the spirit in which they have been recommended.

We look forward to an affirmative response.

About NAGAR:

NAGAR is a not-for-profit organization established in 2000, born out of the passion of several citizens with a goal to improve life in the city of Mumbai. NAGAR's former constituents are CitiSpace, CLEAN-Air and CLEAN-Sweep. NAGAR continues to work in the area of preservation of public open spaces, solid waste management, improving air quality, preservation of water bodies, beaches, mangroves, built and natural heritage, efficient road space management and water conservation. The organization is committed to advocating for better enforcement of existing laws, recommending policy changes for improved governance on civic matters, and contributing to urban renewal efforts. NAGAR has a broad network of citizens across the city and collaborates with other civic NGOs to address specific issues.

Thanking you,
Yours Sincerely,

Nayana Kathpalia
Trustee

On behalf of Trustees

Atul Kumar D M Sukthankar Dinesh Ahir Kunti Oza
Meher Rafaat Nayana Kathpalia Neera Punj Parul Kumtha

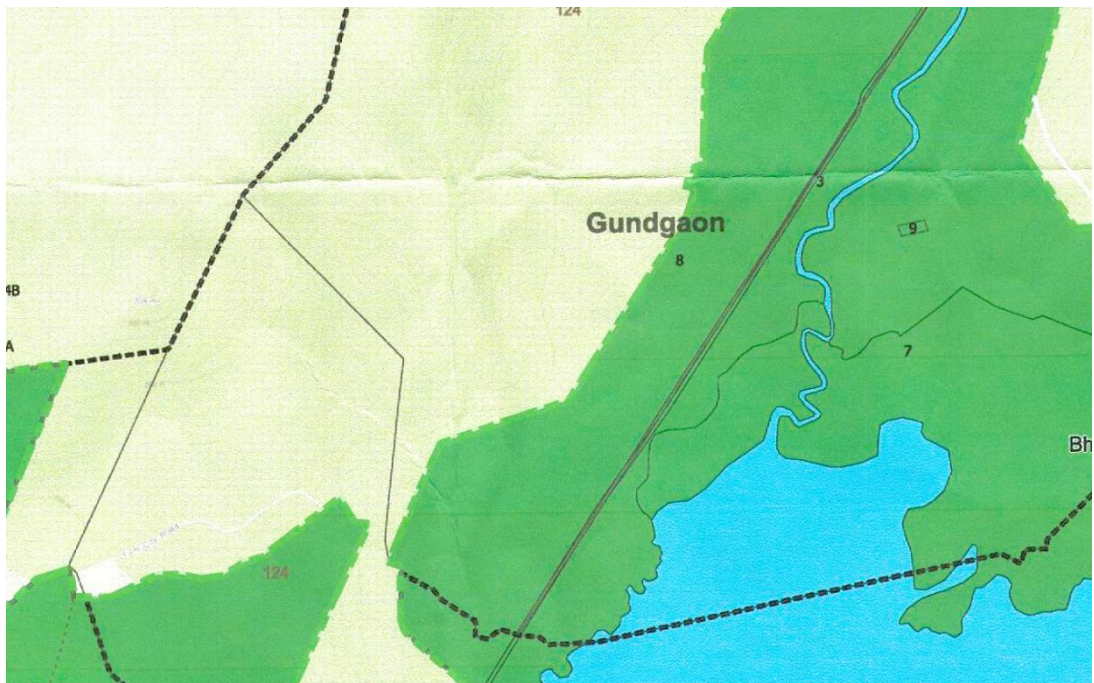


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Annexures

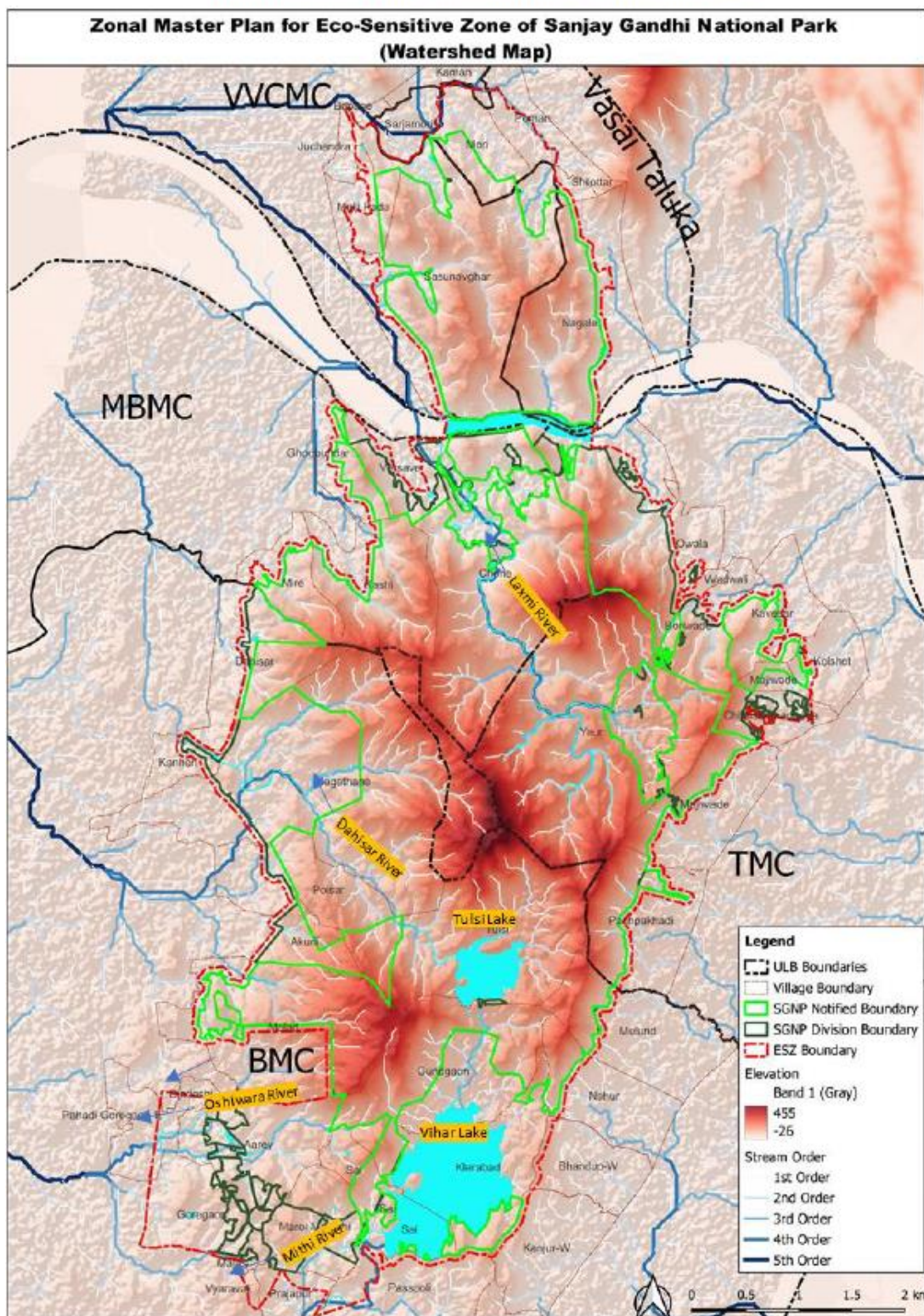


Annexure 1: Snapshot of Draft DP 2034 with areas around Vihar lake marked as Natural Areas



Annexure 2: Draft Zonal masterplan for ESZ of SGNP with areas around Vihar lake marked as ESZ II

Figure 3.11: Watershed for the SGNP and ESZ



Source: Consultant Analysis

Annexure 3: Water shed Map as seen in the Draft Zonal masterplan for ESZ of SGNP