

Where have all the wise men (and women) gone?

ARCHITECT DR. NIZAMUDDIN AHMED

One would have expected this, albeit unfortunately, from an undemocratic elected government, but to be handed an anti-people, anti-poor city development plan via the age-old tactful bureaucracy at the end of an extended caretaker government, whose primary laudable mission was to bring the nation on a virtuous track is downright insulting and a stinker.

Although it is not uncommon for us to blame all our woes on conspiracies hatched by our opponents, it would not be an exaggeration to allege that the haste and timing of the promulgation of the Detail Area Plan (DAP) of Dhaka, the third stage of establishing a planned megalopolis, are devious tools employed by vested quarters to inflict a farewell culpability on a CTG that is about to present the country with a free, fair and neutral national elections.

Dhaka's DAP has violated government policies, is designed to rob the city and its surrounding areas of troughs that are essential to keep it flood-free, will eat up vital agricultural land to meet the profane lust of developers, and will do nothing for the people in whose name all our parliamentary candidates swear every time they file their nomination.

The concept of DAP is steeped in high probity, but as with several other apparently lawful tenets, the astute business people have found in it the right vehicle with which to pillage the countryside, the green urban islands and the hopes of a population who look up to city fathers to bring a 'change', if not for them but for their posterity. Through Dhaka's DAP as drafted and to be promulgated shortly, there is an effort to legalise the illegal, read immoral too, activities of the land dacoits.

There is no doubt that Dhaka and other cities require detail planning of its areas, but their spirit and content should be commensurate with the total planning of the respective cities.

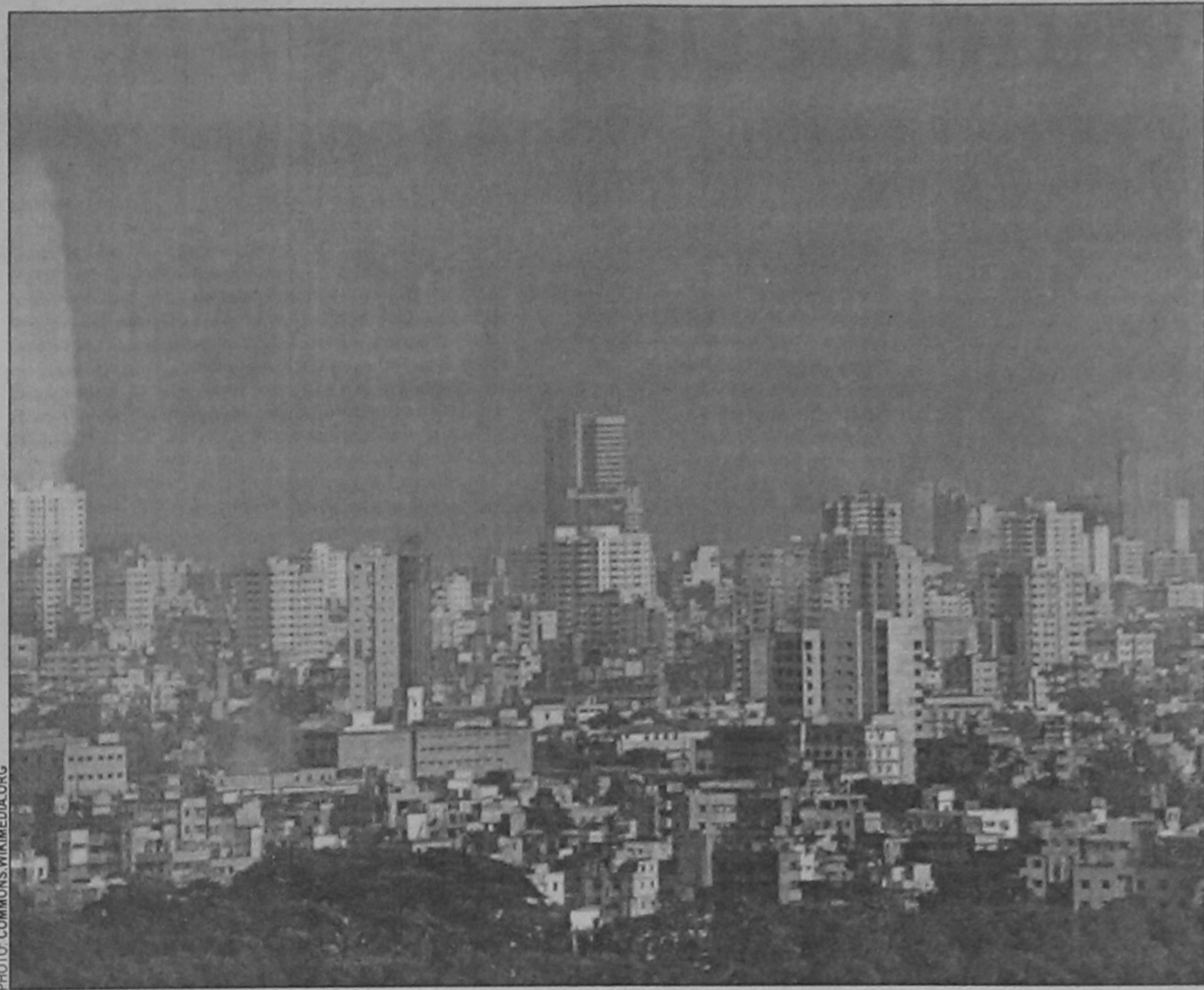
And that is where the community of architects, planners, environmentalists and lawyers find maximum disparity.

Today's presentation is an effort by the Bangladesh Institute of Planners (BIP) to make Dhaka's DAP readable for our readers so that they can grasp the gist of a plan that will affect how they live (or not) in a city that they consider their paternal and maternal property. Unfortunately, so do some narrow-minded personnel at the helm of affairs and their financially imbued partners.

In order to save Dhaka and our cities from the evil clutches of these self-seekers, we need not angels to descend from above, but the awakening of wise men and women from within the government and outside, who shall truthfully advise the CTG on the pros and the cons of DAP, and most essentially, the need to float it for wider inspection and evaluation, not mere eyewashes, so that when the rectified plan shall be implemented, the citizens shall gratefully recall the judiciousness of the concerned Adviser, the Secretary, and the professionals. There is no higher a blessing, Mr. Advisor, Mr. Secretary, and my dear fellow professionals.

Let us not organise our personal future at the cost of the next generation.

The author is Consultant to the Editor on Urban Issues and National Commissioner, Bangladesh Scouts.



Detail Area Plan (DAP) of Dhaka: Shattering the vision of DMDP

BANGLADESH INSTITUTE OF PLANNERS

DHAKA will be the second largest megacity by the year 2015. This mega city is the hub of commerce, administration and industries of Bangladesh. It is accommodating about 37% of total urban population of the country. A large share of the huge population belongs to poor and middle income groups.

This city is growing primarily in a spontaneous manner. The first plan for the city was prepared in 1959. In 1997, Dhaka Metropolitan Development Plan (DMDP) was approved and provided the planning policy guideline for Dhaka. DMDP was a three tier plan the first tier is the Structure Plan, which stated all the policies regarding the development of Dhaka till 2015. The ongoing Detail Area Plan (DAP) is the third tier of DMDP. DAP, as the lowest tier, must comply with the policies stated in DMDP Structure Plan.

RAJUK appointed four consulting firms to prepare the DAP. Recently the consultants submitted the draft proposals of DAP to RAJUK. The process of public hearing on the plan has been criticized by various professionals, environmentalist and civil society groups. Representatives from Bangladesh Institute of Planners (BIP), members from academia and civil society attended some of the meetings arranged by RAJUK. Most of the participants observed that there were contradictions in the approach to the proposed plan and pointed out various issues which would jeopardize environment and social goals of the city. Considering the importance of the plan in the national context, BIP, Bangladesh Paribesh Andolon (BAPA), Bangladesh Environmental Lawyers Association (BELA), Institute of Architects Bangladesh (IAB) and Centre for Urban Studies (CUS) organized a press conference to highlight the shortcomings of the proposed DAP. In addition BIP formed a review committee to review the proposed plan. The committee found that there is gross violation of national laws and DMDP. If the plan is implemented in its present form it would not only endanger the well being of future generation but also create social unrest and environmental disaster to Dhaka.

RAJUK did not conduct any study to calculate land-use requirement for the DMDP area. As a result individual consultants did not get any comprehensive guideline from RAJUK and failed to meet the actual land-use demand of city dwellers. The project director of DAP was requested

to provide a comprehensive land-use data to review the status of land-use allocation to different land-use categories. But it was surprising to know that RAJUK does not have any such compiled data for entire Dhaka Metro Area. It seems that consultants only focused on their specific locations. It is assumed that RAJUK would provide standards for public land-use categories for Dhaka. Although there are many technical and conceptual problems in the plan, the following major issues require due attention to save Dhaka from further deterioration:

Legal Aspect

DAP has been conducted to fulfill the obligation of Dhaka Metropolitan Development Plan (DMDP). It is a legal document (SRO No. 184-law/97 dated 3rd August, 1997). It is not legal to violate DMDP. As the lowest tier of DMDP, DAP must conform to policies stated in DMDP Structure and Urban Area Plan. The BIP Review Committee identified some gross violation of DMDP policies in the proposed DAP. Following are some of the major examples:

According to DMDP, there are two categories of Flood Flow Zones: (i) Main Flood Flow and (ii) Sub-flood Flow Zone. But in the proposed DAP, there is no category as "sub-flood flow zone". This change of land-use category is a gross violation of DMDP.

According to DMDP Structure plan, "agricultural land" is classified into two categories: "High Value Agricultural Land" and "Agricultural land". It is surprising to see that DAP proposed only one category of agricultural land, labelled as: "Agriculture with Rural Homestead". This certainly make us curious why this change has occurred which would put the agricultural land under threat of encroachment. We are afraid that this change would create scope for the private land development companies to extend urban uses in the valuable agricultural land.

In addition to violation of DMDP policy, proposed land uses within flood flow zones are also contradictory to the following acts:

- Water Body Conservation Act 2000
- Bangladesh Environment Conservation Act 1995
- Also violating the obligation to RAMSAR Convention of which Bangladesh is a signatory.

Flood Flow and Drainage

JICA in its report on Flood Action Plan for Dhaka (FAP-8A and FAP-8B), identified main and sub-flood flow zones. The DMDP Structure Plan adopted the policies stated in JICA

reports. Following are the flood zone policies of DMDP: **FLOOD ZONE POLICY RS/3-FLOOD-FLOW ZONES** Land development, within the designated flood plain areas of the DMDP Structure Plan, will be controlled in order to avoid obstructions to flood flow, which might otherwise result in adverse hydraulic effects, such as the rise of flood water levels and change in flow direction.

Main Flood Flow Zone

Land Development for residential, commercial and industrial development including raising the level of land via land filling will strictly be prohibited. Permitted uses, provided that they cause no adverse hydraulic effect will be:

- Agriculture
- Dry season recreation facilities
- Ferry terminals; and
- Excavation of mineral deposits, including dry season brick works.

Causeways for roads or railways will be permitted, subject to detailed geological surveys being undertaken and on condition that they are built with culverts sufficient to allow for unimpeded flood flow.

Sub-flood Flow Zone

Development compatible with the rural nature of these mainly rice growing areas, will

be permitted on condition that the:

- Structures are built on stilt, or on land raised above design flood water level.
 - Alignment of structures and raised land to be designed so as not to disturb flood flow.
- POLICY RS/5 FLOOD RETENTION PONDS** Control will be maintained over the areas designated in the DMDP Structure Plan for flood retention ponds in order to ensure that they remain capable of fulfilling their primary function of water storage at times of flooding. The use of the land within designated pond areas to be restricted to the following activities:

- Agriculture;
- Fish cultivation and
- Recreation.

It is unfortunate to see the way the proposals of DAP contradicts with the flood zone policies of DMDP. Most part of sub-flood flow zone has been designated as "urban residential zone" and "agriculture with rural homestead category" in the proposed DAP. Even in main flood flow zones, proposal for "urban residential zone" and "agriculture with rural homestead" category is evident. DAP has followed the drainage proposals of Halcrow (2006) where much less amount of retention pond areas has been suggested compared to JICA study

(1992). Considering the climate change scenario and increased intensity of rainfall within short duration, Dhaka has become more vulnerable to rain induced flood (Alam and Rabbani, 2007). In such a context, it raises question why the Halcrow (2006) study has been followed by the DAP consultants. It was expected that the consultants would conduct their own study to determine the size and location of retention pond areas and drainage network in Dhaka. JICA proposal designated 12% of total land area as retention ponds whereas DAP proposes only 5.05% of total embankment area of Dhaka. Findings of Halcrow (2006) study were widely criticized by different professional and environmentalist groups. It is surprising to see that the sites of proposed "retention ponds" in some locations have already been filled up by the developers. It is claimed by the consultants that no more low-lying land is available in the eastern fringe area. However our studies find out that there is considerable amount of land available in the area. Before finalizing the proposed DAP, it is essential to review the size and location of retention areas very cautiously. Otherwise, it would be difficult to control adverse impact of rain flood in future. Smaller retention areas

will need higher capacity of pumps and thus more dependency on electricity. Even after large-scale illegal encroachment of low-lying land in the eastern fringe, it is still possible to designate higher percentage of retention pond areas there.

Agricultural Land

In modern town planning approach, urban agriculture is highly emphasized to meet the food demand of urban population and limiting the size of ecological footprint. DMDP stated policies to conserve agricultural land to ensure a base for urban food supplies in close proximity to the city and to improve income levels within the agricultural sector of the metropolitan area's economy. DAP paid no attention to this. As a result vast swathes of fertile agricultural lands are proposed to be converted to urban residential and mixed-use development. In several locations, agricultural land category of DMDP has been replaced by "urban residential use" category in DAP maps without any rational explanation. It is surprising to notice that "High Value Agricultural Land" and "Agricultural land" category of DMDP have been replaced by "Agriculture with Rural Homestead" land-use category. This change of classification would create opportunity for land speculation by private developers and individuals, and would displace rural folks from their homestead.

Open Space Open space is the lungs of any city. It is already recognized that Dhaka has lack of open space which has negative impact on public health, ecology and society. The plan failed to realize the need of the society. If the proposed plan is executed there would be only 0.328 acres of land/1000 population which is far below than any other densely populated cities of the world. The necessity of open recreational space can easily be understood when we see the pressure of population in Ramna Park and Dhanmondi Lake area. The plan proposed only one third of the land as open space after proposed relocation of Central Jail. We feel that this is inadequate and would be grabbed by vested quarter as the rest of it demarcated as residential and commercial use. The vacant area must be designated as city scale open space to meet the critical demand of residents of old Dhaka.

Residential Area

It is a known fact that Dhaka does not have housing stock to accommodate 15 million people but it should be kept in mind that majority of the population of Dhaka belongs to middle and low income group who as no access to housing market. It was the pre-requisite of DAP to determine land requirement for residential land-use for different income groups up to the year 2015. But unfortunately DAP failed to address the housing requirements of poor and middle income groups. Instead it encouraged development of high income residential area of Gulshan by acquiring low-middle income area of Badda Merul. The proposed DAP unnecessarily allocated huge amount of land for residential use to accommodate the desires of vested interest groups jeopardizing the environmental and social equity goals of the city. This would eventually lead to land speculation and social discrimination. None of the DAP reports provided any strategies/tools to control land speculation and regulate development.

In last 10 years, Private Land development Companies have illegally

encroached huge amount of flood flow zones, retention areas, agricultural lands for housing projects. These unapproved projects are not identified by the DAP consultants (though these information was readily available) in their reports while they discussed about existing land-use scenario of the study areas. But the proposed DAP has accommodated all these illegal projects by changing land-use categories specified in the DMDP. For example "Jhilmil housing project" by RAJUK and Pangaon Container Port at Keranigonj, Modhumati Model Town and many other housing projects do not conform to DMDP as these are located in Sub-Flood Flow Zones.

The review committee feels that both consultant and RAJUK over emphasized the importance of residential use. The proposed allocation of residential area in DAP could accommodate more than 38 million people with nominal density of 187 people/acre which is more than double of projected population up to year 2015. The irrational approach of the consultant to major share of the land to residential use will only serve the purpose of vested interest groups.

Conclusion Many anomalies have been found during micro-level analysis of Detail Planning Zone (DPZ) of DAP. It was difficult to comprehend detail map provided in the reports in many cases while compared with composite DAP map. In some cases inconsistency is visible between detail map (DPZ) and composite DAP map. Even the legends used by different consultants vary considerably. There are also

problems regarding the scale of the maps.

In conclusion we like to draw attention on few more aspects which require careful investigation.

It seems that transport land-use interaction was not viewed comprehensively. Though a large segment of the population is pedestrian and dependent on non-motorized transport (NMT) but no specific programmes are proposed to develop and improve facilities for pedestrians and NMT. Some radical suggestions (like Shifting of Sadarghat goods terminal to Pagla, central truck terminal in Rampura) raised questions regarding the justifications in terms of cost and their impacts on transportation system.

Water supply is a crucial issue for a mega city like Dhaka. The city is primarily dependent on groundwater though surrounded by rivers all around. Due to gradual depletion of groundwater level, it is necessary to undertake necessary action to secure prevailing sources of surface water and to encourage rainwater harvesting. But no such direction is evident in the proposed DAP.

We must remember Dhaka has a glorious past of four hundred years as a capital city. The city was blessed with water bodies and greeneries. Over the years, spontaneous unplanned development took place due to the negligence and ignorance of the regulating authority. But the proposed DAP failed to address the critical issues for sustainable development of Dhaka. It is apprehended that if DAP is approved without significant corrections and modification so as to adhere to the Structure Plan proposals, land speculation and land development by private developers will cause immense harm to Dhaka's environment. We strongly suggest that a technical committee comprising of relevant professionals and representatives from the civil society organizations should be entrusted with the task of reviewing DAP in the light of DMDP policies and recommending measures for DAP's corrections/modifications/corrections.

References:

- JICA (1992) Master Plan for Greater Dhaka Protection Project, Flood Action Plan, FAP-8A, Main Report and Supporting Reports I and II, Flood Plan Coordination Agency (presently WARPO): Dhaka.
- Halcrow (2006) Updating/Upgrading the Feasibility Study of Dhaka Integrated Flood Control Embankment cum Eastern Bypass Road multipurpose Project (main Report) Vol.3, Bangladesh Water Development Board, Ministry of Water Resource GOB, Dhaka.
- Alam, M. and Rabbani, M.G. (2007), Vulnerability and Responses to Climate Change for Dhaka, Environment and Urbanization Vol.19 (1): 81-97

