

Manthan Adhyayan Kendra

मंथन अध्ययन केंद्र



07.01.2022

To,

Member Secretary
National Capital Regional Planning Board
1st floor, Core 4B
India Habitat Centre
Lodhi Road, New Delhi-110003

SENT BY: EMAIL to ncrpb-ms@nic.in

Dear Madam/Sir,

Please find enclosed the comments and suggestions by Manthan Adhyayan Kendra, Pune on the Draft of the Regional Plan 2041 for the National Capital Region. Manthan Adhyayan Kendra is an organization researching and monitoring issues of water, environment, and development, specifically the inland waterways projects on the Indian rivers. With this email / letter, we are enclosing our comments for the Inland Waterways Proposals mentioned in the Chapter-5 (Transport and Mobility) of the draft Regional Plan 2041. We request you to please send us acknowledgement of the receipt of these comments.

Sincerely

Avli Verma
Manthan Adhyayan Kendra

S.No.	Version	Chapter No. & Title	Page No.	Para No.	Objection	Suggestion
1.	English	5. Transport and Mobility	56	5.3.59	<p>On expediting and making fully operational the National Waterway-110 by 2025, we would like to bring your attention to the Detailed Project Report for NW-110, prepared for the Inland Waterways Authority of India, which very clearly states that the National Waterway-110 is not financially viable.</p> <p><i>“The project has been found to give no returns to very poor financial returns in all possible modes/structures of investments. Hence, the project has not been found to be financially viable on standalone basis.”</i> (Final Detailed Project Report- Volume 1 (Main Report), IWAI, January 2020, page xxvi)</p> <p>It is also important to note the number of interventions required in the Yamuna River to make it navigable. The DPR of the NW-110 mentions the need of 20 barrages on the river Yamuna for maintaining the water depth.</p> <p><i>“For maintaining 2.5-meter water depth in the channel from Delhi to Prayagraj 20 nos. of barrages has been proposed.”</i> (Final Detailed Project Report- Volume 1 (Main Report), IWAI, January 2020, page xxi)</p> <p>Specifically, the stretch of the river Yamuna that falls in the NCR region does not have the required water depth. In the analysis done for developing the waterway here, it is suggested that,</p> <p><i>“Dredging river bed 1.0 m to 2.0 m over such a long reach will not be economical and it may not serve purpose due to inadequate flow in lean season. Provision of barrage at an interval of about 30 km with pond depth of 5 m to 6 m at each barrage is the only possible measure.”</i> (Final Detailed Project Report- Volume 1 (Main Report), IWAI, January 2020, page xx)</p>	<p>The total capital cost of the National Waterway-110 is estimated for the phase-1, phase-2 and phase-3 at Rs. 7165.26 Crore Rs. 5078.01 Crore and Rs. 7386.60 Crore respectively.</p> <p>With such high capital investment and no to very poor financial returns and probability of high environmental and social costs due to the interventions such as dredging, construction of</p>

				<p>In addition to barrages, navigation locks need to be constructed. Around 45 existing bridges would need to be demolished and reconstructed. A number of cargo and passenger terminals would also be required to be built.</p> <p><i>“45 nos. existing bridges falling in the stretch of Yamuna River are not having requisite horizontal and vertical clearance as per IWAI guidelines and needs to be demolished and reconstructed.”</i> (Final Detailed Project Report- Volume 1 (Main Report), IWAI, January 2020, page xxi)</p> <p>On the construction of cargo terminals, The NGT Yamuna judgment of 2015 (Maily se Nirmal Yamuna) should be referred as it specifically prohibits any activity that would pollute the river further or any construction on the river bed. (For reference, please see https://nmcg.nic.in/writereaddata/fileupload/ngtmatters/NGT%20judgement%2013.01.15.pdf)</p> <p>It is important to foreground here that there is <u>no assessment</u> done to understand and assess the environmental and social impacts of these massive interventions in the river. There are no efforts so far in the public domain that hint at meaningful inclusion of the stakeholders -local population, fisherfolks, boats people, draw down cultivators, those using river for cultural and religious practices, etc who will be directly impacted due to such interventions.</p> <p>It also needs to be foregrounded that the Action Plan for the development of National Waterways by the Inland Waterways Authority of India does not include the Yamuna National Waterway in the list of waterways found viable for cargo/passengers. There are no plans therefore to develop this National Waterway by IWAI in the next five - ten years. Details of the same can be looked at in the recent question answered in the Lok Sabha on 10.12.2021 which does not mention any development envisaged on the Yamuna Waterway. (Lok Sabha, Unstarred Question No. 2155, Answered on 10.12.2021, ‘Inter-State River Waterways’- http://164.100.24.220/loksabhaquestions/annex/177/AU2155.pdf)</p>	<p>barrages, construction of terminals and movement of barges in the river, we suggest the social and environmental cost benefit analysis be done in a transparent and inclusive manner for this project. The projects of this scope with multiple and compounding impacts on the riverine communities should be first discussed widely in the public domain.</p> <p>Moreover, before taking any further projects on the river Yamuna, the larger work of revitalising</p>
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2.	English	5. Transport and Mobility	56-57	5.3.60 & 5.3.61	The recent project reports and other official reports and statements with regards to the introduction of ferries in the river Yamuna or for developing the Yamuna National Waterway for cargo or passenger movement have foreground the inherent non- viability from commercial or financial perspective. (See points mentioned as objections above)	To explore further opportunities of the similar nature, such as those mentioned above, require extensive viability assessments as well as prior assessment of social and environmental impacts. It would be prudent to take suitable lessons from the recent Yamuna Water

						<p>taxi project or the National Waterway -110 and work on the larger issue of revitalisation of the river Yamuna including the larger issue of pollution, allowing and maintaining free-flow of the river, and floodplain demarcation and restoration.</p>
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