

## Environmentalists concerned over easy clearances for Bengaluru's real estate

by Bhanu Sridharan on 8 September 2021



- *Studies show that built-up area is rapidly replacing green cover and wildlife habitats in Bengaluru city.*
- *To address this concern, buildings and townships in India require to receive environmental clearance before construction from the state nodal agencies.*
- *In Bengaluru, however, the environmental clearance process for real estate projects shows little concern for biodiversity.*

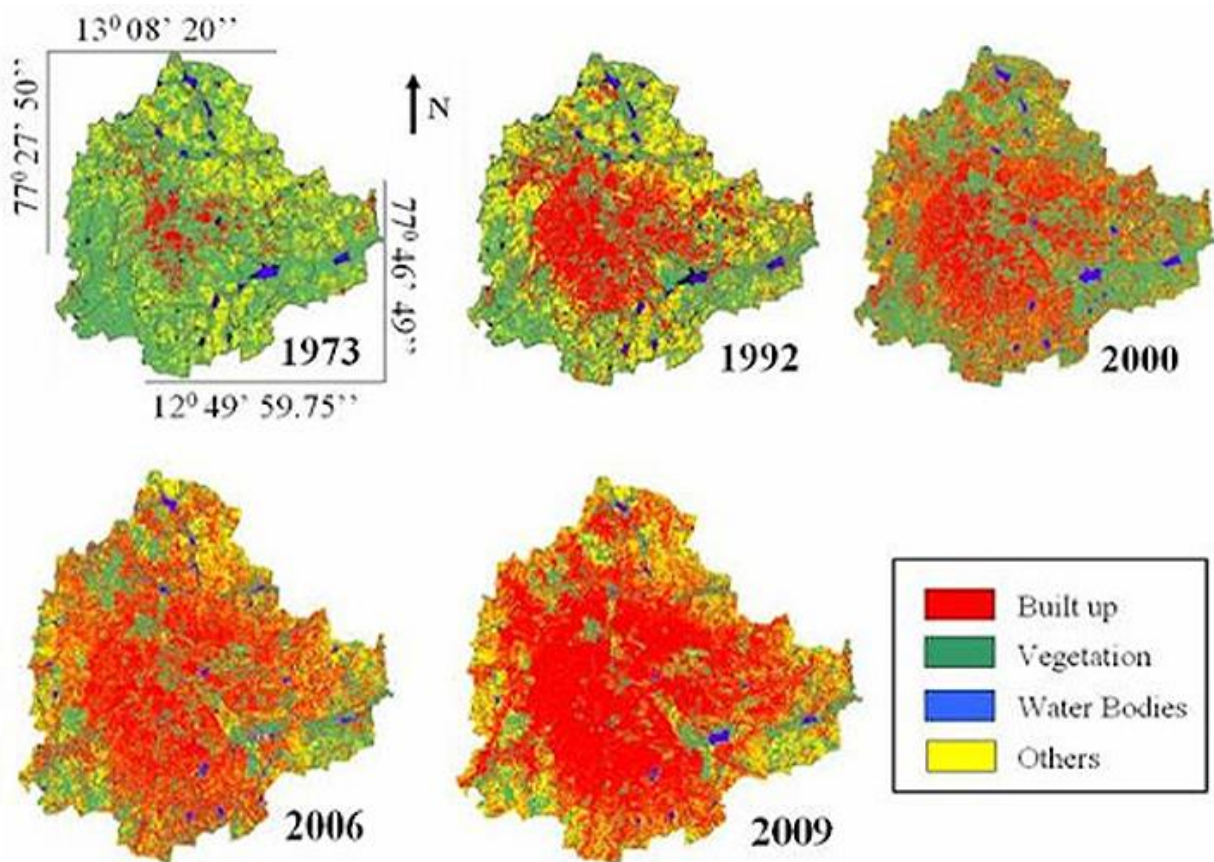
Bengaluru, the fourth most populous metropolitan city in India, is a favoured market for real estate developers. This has, consequently, led to concerns about the city's environmental health.

Several studies have pointed out that built-up area in Bengaluru is [replacing green cover](#) and [habitats for wildlife](#) in the city. The wildlife includes 41 species of [mammals](#), over 300 species of [birds](#), including migrants from Central Asia and the Arctic, 17 species of [amphibians](#), 52 species of [reptiles](#), and 1707 species of [insects and arachnids](#).

To address these issues, real estate projects in India were brought under the purview of the [Environment Impact Assessment Notification in 2004](#). State nodal agencies examine these proposals for construction projects and determine if they can be given environmental clearance. But civil society organisations have raised concerns that the Karnataka State Environmental Impact Assessment Authority (SEIAA) has been clearing construction projects in Bengaluru [with little scrutiny](#).

Leo Saldanha, Convener of the city-based NGO Environment Support Group, said that the state government had a “*laissez faire* approach” towards real-estate companies. “There is such an aggressive commercialisation of land in the city, that biodiversity is seen as a liability,” he said. A closer look at the process by which the real estate projects assessed biodiversity impacts in the city revealed some worrying trends.

There are two types of real estate projects that require environmental clearance. Construction projects with a built-up area of 20,000-1,50,000 square metres are required to provide details of the project via two forms. Form 1 gives the SEIAA basic information about the project and the location, while Form 1a is a detailed checklist of the anticipated environmental impacts from construction and operation of new buildings. The SEIAA passes these documents over to the State Environmental Appraisal Committee (SEAC) — a body of technical experts in fields like pollution, hydrology and ecology. These experts examine the documents and make recommendations based on which the SEIAA clears or rejects the project.



Built-up area has been replacing green cover and wildlife habitats in the city. Graphic courtesy T. V. Ramachandra/Indian Institute of Sciences.

Even though the two forms are the primary source of information for a vast majority of construction projects cleared in Bengaluru, several projects provided no real detail about the environmental impacts of construction. In some cases, builders acknowledged that vegetation

would be cleared for construction in Form 1 but claimed that there would be no threat to vegetation biodiversity in Form 1a. When asked if the projects would impact fauna, most projects simply said “No” with no details about how they arrived at this conclusion, but received clearance.

The current Karnataka SEIAA Chairman K. R. Sreeharsha said that builders usually gave presentations to the SEAC during which issues with the proposals could be raised. But the minutes of several SEAC and SEIAA meetings were not available online despite this being mandatory under the EIA Notification 2006.

## **Environment Management Plans**

A crucial part of the proposal is an Environment Management Plan (EMP) submitted by the builders. EMPs are supposed to show the SEIAA how builders would reduce the negative impacts of their project, during and after construction. Most EMPs for real estate projects had very little detail on biodiversity management. Several only focused on issues like pollution and waste disposal, with a brief mention of creating a green belt area around the project site. But the details on green belt area were not customised to the project locations, and no attempt was made to identify what sort of biodiversity would be encouraged there.

Furthermore, several projects that were cleared submitted near-identical Environmental Management Plans (EMPs), particularly with regard to the Landscape Management Plan or Green Belt. An environmental consultant from the city, involved in creating nearly identical EMPs for several projects, said that EMPs were primarily meant to address three impacts of construction projects — air and soil pollution, water consumption, and wastewater disposal and sewage treatment. He added that most project sites were chosen according to the Bengaluru Development Authority’s (BDA) Revised Master Plan 2015, which designated land for residential or commercial use. And that the BDA would not designate sites that housed endangered or rare species for such uses.



Real estate projects above 20,000 square metres have to be assessed and approved by the State Environmental Impact Assessment Authority before construction. [Photo](#) by Amit Gaitonde/Wikimedia Commons.

---

**Read more:** [City of blinding lights: Artificial light disturbs nature's processes in Bengaluru](#)

---

## Environmental Impact Assessments

The third and final category of real estate projects are township projects, that exceed built-up area of 1,50,000 m<sup>2</sup> or total plot area of 5,00,000 m<sup>2</sup> (50 ha). Only township projects are obligated to create detailed Environmental Impact Assessments (EIA). In 2010, the MoEFCC created a [guidance manual](#) for conducting EIAs for Township projects.

The manual asks that builders create a comprehensive inventory of “dominant, rare, endangered, threatened, endemic and indicator species and species abundance and distribution of biological species of study area.” It also states that data on densities and distribution, habitat value, and historically important specimens be included in the EIA. This guidance document is, however, vague about which methods to use for studying different flora and fauna.

But even these broad guidelines are rarely followed. Builders often simply provide a checklist of species after single day studies. Checklists typically focus on visible large flora and fauna such as birds, mammals, and a few reptiles. Smaller fauna are particularly ignored. Except for a few species of butterflies, other insects and arthropods are rarely listed in these checklists.

The EIAs also conducted only a single-season study, the minimum time period recommended by the SEIAA.

“The very fact that birds utilise any given area for their varied life needs, like for obtaining food, shelter, nesting and roosting [means] one should get details on birds of a given area in all seasons,” says Subramanya S., an ornithologist and retired scientist from the University of Agricultural Sciences, Bengaluru. “For even a cursory bird study of an area, I would like at least a fortnightly survey, for a minimum one full year,” he adds. SEIAA chairman K. R. Sreeharsha declined to comment on whether a single season of biodiversity data is adequate, but said he would look into this issue.



Single-season

surveys can miss seasonal migrants such as the Blyth’s reed warbler (left) and the verditer flycatcher (right). Photos by Chetan Rao (left) and Prashant Hulamani (right) via iNaturalist..

The EIAs also justified construction projects by pointing out that species recorded were common and ‘least concern’ on the [IUCN Red List](#) or not protected under the Wildlife Protection Act (WLPA). “If there are a large number of Least Concern species, it does not mean that the area is not important. Every taxa/species found in a given area will have a role to play and would be part of a local food web, and thus should not be overlooked,” pointed out Subramanya.

Conversely, EIAs also reported protected species such as the Indian chameleon. Yet, there appears to be no acknowledgement of this in the impact assessment report nor any mention of the mitigation measures that will be taken up in the light of finding such [rare and protected species](#).

Kanchi Kohli, an environmental researcher with the Centre for Policy Research, Delhi, pointed out that the process of conducting environmental impact assessments was rife with problems. Companies looking for environmental clearance bear the cost of the EIAs conducted by their in-house experts or external consultants. In both cases, because the project proponents pay the consultants' fees, there is little incentive for truly independent EIAs. "The contracts of EIA consultants are often tied with securing environmental clearances, so the baselines and the prediction of impacts all speak to why and how projects should be approved," she says.

While some real-estate projects diluted biodiversity impacts, others submitted EIAs with copy-pasted biodiversity data. The EIA of a Singapore-based real estate company in Bengaluru which received environmental clearance for a residential township project in April 2018, presented biodiversity data from a report published in 1991. This EIA report was further copied by another commercial real estate project in the city which then went on to receive environmental clearance in July 2019.



A barn owl in Bengaluru. When asked if the projects would impact fauna, most real estate projects simply say they don't, with no details about how they arrived at this conclusion. Photo by Abhilash Pavuluri.

Copy-pasting from earlier EIA reports has been [flagged across projects](#) several times over years. In 2011, the MoEFCC stated that environmental clearances would be [cancelled for such projects](#). But the SEIAA Chairman Sreeharsha said that the nodal agency did not have any software mechanism to detect such copying of text in EIAs and it was up to the SEAC to identify such instances during the appraisal process. "While copy-pasting is a legal issue, it also reflects the casualness with which EIAs continue to be prepared in India," said Kanchi Kohli. "These EIAs and their predictions determine ecological futures and human survival. Yet, facts are held back or misreported."

The ultimate problem, however, is that each real estate project cannot account for the cumulative impact of multiple such projects coming up in Bengaluru. A common justification for these projects is that the BDA has already earmarked the land for residential or commercial projects through their Master Plan for the city. Yet, even though the fate of thousands of hectares of land are decided by the body, there is no EIA assessment done for these Master Plans, said Saldanha.

“The need for cumulative impact assessment and policy-level assessments from environment, biodiversity, water and social justice has been an ask for a long time. However, successive governments have shied away from realising this, especially when it comes to the real estate sector,” says Kohli.

---

**Read more: [The link between Bengaluru’s lakes, livelihoods and local memories](#)**

---

*This article is a part of a series on Bengaluru’s Ecosystems and Biodiversity, a joint project between Mongabay-India and Citizen Matters, supported by the [Bengaluru Sustainability Forum \(BSF\)](#). This is an abridged version of a [three-part](#) article published on Citizen Matters.*