

C A G

Citizen consumer and civic Action Group

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The Director General Highways Department, Govt of Tamil Nadu 76, Sardar Patel Road, Guindy, Chennai-600 025

Dear Sir,

<u>Sub: Concerns about the Chennai Smart Urban Roads Project's exclusion of non-motorized and shared transport</u>

We are writing to you on behalf of the Sustainable Mobility Network, a group of organisations working in Tamil Nadu and throughout India to support the growing demand for environmentally and climatically responsible, sustainable, and people-centric transport and mobility in our cities.

We welcome the initiative taken under the Tamil Nadu Road Sector Project II of the Highways department on the transformation of existing roads to Smart Urban roads in Chennai.

As publicly stated, the project

- proposes to improve these roads in a way and form that makes people centric mobility seamless, including making them friendly to non-motorised transport and public transport mechanisms.
- is being pursued with World Bank Assistance to increase the delivery of sustainable urban spatial planning and urban mobility with a view to enhancing people's access and mobility.
- will also consider the improvement of road safety, multi-modal integration, and the development of public spaces.

In addition to the inter-government and departmental consultations that have presumably happened with other related agencies (for e.g. CMDA, CUMTA, CMRL, GCC, MTC, Police and others), we acknowledge that an effort has also been made to engage with citizens and civil society representation.

In this regard, we were invited to participate in the Stakeholder Consultations - of the four consultations (each for different roads), we participated in three. The consultations followed a similar format with an hour-long presentation by the consultant, L&T, followed by an open house for questions, comments, and inputs from participants.

While the effort to consult and seek inputs is once again appreciated, we believe there is a sizable disconnect between the project's stated goals and the way it is currently being developed. We are highlighting a few of our key concerns in this regard.



- Absence of pedestrian space, inadequate accessibility? and not adhering to IRC & Harmonised Guidelines: While presentations over these consultations referred to contiguous footpaths with ramps as required, for easy access, the footpath parameters have not adhered to IRC Guidelines and the Harmonised Guidelines for Universal Accessibility, 2021.
- Inefficacy of pedestrian crossing infrastructure: While at-grade crossings at intersections were mentioned, several foot overbridges (FOBs) /subways are also being proposed. We would emphasise that existing FOBs are already under-utilised as they are inconvenient, inaccessible, unsafe, poorly designed and maintained, even if they are equipped with escalators / elevators. Moreover, they appear to have a very specific and limited function that is to facilitate automotive traffic rather than people's movement and mobility
- The plan and thinking completely ignores cycles and cyclists: The reasons given for their omission space constraint
- The proposals primarily do not include buses: Bus lanes were considered on just one section of roadway. Although bus stops were on the left lane in this instance, the bus lane was placed in the fast lane. It was unclear how buses would switch lanes back and forth. Buses played absolutely no role in the plans for the other roads.

On the whole, there remains a clear emphasis on easing traffic congestion, ensuring priority for motorised and in particular, private vehicles, over non-motorised, public and other shared modes of transport. This appears to be at odds with the project's declared intent, as well as with widely recognised standards and best practices, including the SDGs, the National Urban Transport Policy of 2014, and Chennai's NMT policy, among many others.

Moreover, such an approach also seems to ignore the needs of several hundreds of thousands of people in Chennai, who continue to rely on walking and cycling as primary mobility modes to earn their daily livelihoods.

In view of our reflections, we urge you to review the project's current design and development to ensure that it addresses the needs identified around non-motorised and public transport. We remain open to engage with this process, and do so with the expectation that inputs shared will be reflected upon and addressed.

Thank you for your time and attention to this matter.

Looking forward to your response

On behalf of the Sustainable Mobility Network,

Yours Sincerely,

S. Saroja

Executive Director

Cc: The Project Consultant,

Traffic and Transportation Department,

L&T Infrastructure Engineering Limited, Chennai