

# Environment Support Group ®

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Mr. Gaurav Gupta, IAS  
Commissioner  
Urban Land Transport  
Karnataka Urban Development Department  
Vikasa Soudha  
Bangalore 560001

18th March 08

Dear Mr. Gupta,

Environment Support Group (ESG) is a registered non-for-profit public interest research, training, campaign and advocacy initiative working on a variety of social and environmental justice issues. An important aspect of its work has been related to urban planning issues. Over the past three years it has been instrumental in building a network of concerned citizens, community organisations and NGOs called '*Hasiru Usiru*'. The mandate of the network is to primarily work together in protecting Bangalore's greenery, forest tracts and public spaces and also help to evolve socially and ecologically sensitive rationales for urban planning and development.

By way of the present representation we wish to draw your attention to the gross irrationalities that are latent in the current road widening programmes in Bangalore, being undertaken by Bruhat Bengaluru Mahanagara Palike (BBMP). As we understand, there are 85 roads proposed for road widening, and ESG, in particular, and many associates of *Hasiru Usiru* have undertaken systematic studies and surveys which establish beyond any reasonable doubt that the road widening programmes will not only meet the objectives set forth in their justification, but would also destroy the character of the city. Besides such irrational exercises are bound to increase substantially the traffic burden, as it only encourages private modes of travel, but consequently high risk to pedestrian and road users, including even due to poor designs.

We wish to highlight here that three years ago BBMP had initiated a similar initiative involving the felling of 762 trees as part of a road widening proposal on some prominent streets. Substantive examination of the proposal revealed that these proposals were quite irrational and this resulted in a city wide campaign that rejected the proposals and also resulted in the constitution of *Hasiru Usiru*. About this time ESG filed a PIL questioning the merits of such schemes before the Hon'ble High Court of Karnataka in WP No.14104/2005 (GM PIL). The Hon'ble Court was pleased to dispose the petition taking cognisance of a letter by the Chief Secretary of Karnataka that endorsed the prominence of the Karnataka Tree Preservation Act and the assurance of involving the public, especially *Hasiru Usiru*, in decisions relating to tree felling for road widening. The Hon'ble Court in fact put it beyond any doubt that the submission of the Chief Secretary was binding as it expressed "hope and trust that the authorities concerned will obey and comply with the directions issued in the letter dated 6.6.2005 of the State Government, in its letter and spirit." A copy of the said judgment is annexed at **Annexure A**.

Consequently, ESG in collaboration with *Hasiru Usiru* network has been actively interacting with various authorities to ensure that the processes of road widening are rational, democratic and purposeful. We highlight some of the measures we have adopted in this direction.

1. Working closely with the office of the Tree Officer of BBMP, we have helped to minimise unnecessary felling of trees. As part of this process the Tree Officer invited ESG and CIVIC,

two constituent groups of *Hasiru Usiru* for a field review of the proposals to widen Sheshadri and Palace Roads during August 2007. ESG involved its Advisor Dr. Subbarayan Prasanna, Urban and Regional Planner and Retd. Professor and Dean (IIM-Bangalore) in this exercise and he presented his views questioning the viability of the scheme in the meeting the objectives set out. A copy of his opinion, including his offer of volunteering his services to BBMP, is enclosed at **Annexure B**. Consequently, the tree felling orders for these roads which had already been issued were revoked, thus putting beyond any reasonable doubt that there has not been any careful review of road widening designs. A copy of these orders is orders is annexed at **Annexure C**.

2. Soon after the Chief Engineer of the Road Widening Cell of BBMP called a meeting with *Hasiru Usiru* wherein a variety of viable suggestions were proposed to arrive at rational solutions to Bangalore traffic problems. In this meeting the officers shared with us the designs of roads which were to be widened, each of which was carefully reviewed by us and detailed comments provided. The proceedings of this meeting held on 24<sup>th</sup> August 2007 is enclosed as **Annexure D**.
3. As it was admitted by the Tree Officer and engineers of BBMP that the push for road widening was from the top of the State's administration, a meeting was sought with the Bangalore Metropolitan Land Transport Authority (BMLTA). This meeting was held on 30th November 2007 and saw representation from the highest levels of all the concerned government agencies. However, it failed to initiate any rational or considerate action on taken further widespread concerns over the road widening schemes. Representations made in this meeting and also subsequently expressing our collective disappointment over the lack of progressive engagement to evolve rational solutions is enclosed **Annexure E**.
4. The need for engaging in dialogue and public involvement in such decisions is the responsibility of the State. As we did not find any initiative to consult the public from BMLTA with regard to the road widening schemes, ESG, CIVIC and Alternative Law Forum on behalf of *Hasiru Usiru* organized, a Public Consultation on '**Road widening schemes in Bengaluru: Impacts and Alternatives**' on 20th December 2007. This consultation was chaired by Mr. P. S. S. Thomas, former Secretary General of National Human Rights Commission and a detailed report of the proceedings, along with presentations made therein, is enclosed for your perusal at **Annexure F**.

These efforts clearly prove that Hasiru Usiru and Environment Support Group have spared no effort in playing a constructive role in helping the government and its agencies to achieve better travel and transport modes for Bangalore's population, while also protecting its greenery, which is an integral part of the city's heritage and landscape.

Having said this, we would also now like to draw your attention to circulars issued by the Union Ministry of Urban Development which raise similar concerns. In a circular issued to all Chief Secretaries in D.O.No.K-14011/07/2007-UT dated 2nd January 2008, the Secretary of the Ministry has emphasized the need to "promote pedestrianisation and non motorized transport." The letter clearly indicates that "whatever pedestrians and non motorised transport (NMT) facilities are existing, they are being diminished while doing widening of roads to facilitate movement of personalized vehicles." A copy of this circular is attached for your ready reference as **Annexure G**.

Another important fact is that the National Urban Transport Policy (NUTP) puts the focus on the mobility of people and not the mobility of vehicles. It also clearly states the need to encourage public transport as it is the most viable solution. Needless to state there is considerable emphasis on pedestrian safety and non-motorized transport.

Similarly the JNNURM puts onus on the authorities to abide by City Development Plans which aim at long term goals for infrastructure development and not short term *ad hoc* schemes like road widening which are likely to do more damage than improve upon existing conditions.

BBMP is now seriously pursuing road widening programmes on 85 major roads of Bangalore. The Tree Officer has been pressurised (admittedly from the highest levels of the State) to allow clear felling of trees on most of these roads. The number of trees thus felled would run into hundreds and thousands. There is simply no way to compensate for such a massive loss of greenery in the city, and the environmental consequences of such irrational destruction will be dire. Such schemes also constitute a direct threat to the existent character of these roads which is the quintessential character that Bangalore has always been proud of. Historically and due to sensitivity of planners over time these very roads that are sought to be widened provide spaces that support livelihoods of hundreds of families. These families will be hard pressed to find alternate livelihood sources if the road widening programmes proceed as currently planned continue.

Needless to state, the current road widening programme does not meet any of the rational standards developed per the National Building Code of India, Indian Road Congress, municipal laws, tree protection laws, land use planning laws, environmental laws, circulars and guidelines issued by the Government of India, national policies, and significantly directions of the Hon'ble Courts on such matters.

Keeping these matters in view, we urge you to stop ongoing road widening efforts with due dispatch. Any delay in taking such action will substantially and irreversibly cause damage to the city's character and its environmental qualities while failing to achieve the objective of improving travel speeds and comfort. ESG in collaboration with all the constituent groups of *Hasiru Usiru* is willing to extend all cooperation and support to all government agencies so that the proposals that are evolved actually meet wider public interest objectives. In this manner we will also be able to arrive at solutions that are visionary and not short sighted as is presently the case with the current road widening schemes.

We look forward to your cooperation and support.

Yours sincerely,

Leo F. Saldanha  
Coordinator

Divya Ravindranath  
Research Associate

Environment Support Group

Cc.:

Union Minister for Urban Development  
Deputy Chairman of Planning Commission  
Member of Planning Commission of India on Urban Affairs  
Advisors (Home and Urban Development) to His Excellency the Governor of Karnataka  
Chief Secretary of Government of Karnataka  
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Secretary, Union Ministry for Environment and Forests  
Secretary, Union Ministry for Surface Transport  
Members of BMLTA