Resettlement Plan

Document stage: Draft for Consultation
Project Number: 49107-003
May 2018

IND: Tamil Nadu Urban Flagship Investment Program (TNUFIP) – Vellore Underground Sewerage System

Prepared by Vellore City Municipal Corporation, Government of Tamil Nadu, for the Asian Development Bank.
CURRENCY EQUIVALENTS  
(as 11 May 2018)  
Currency Unit – Indian rupee (₹)  
 ₹1.00 = $0.0149  
 $1.00 = ₹67.090

ABBREVIATIONS

ADB – Asian Development Bank  
ASO – Assistant Safeguards Officer  
CMSC – Construction, Management and Supervision Consultant  
DMS – detailed measurement survey  
EMP – Environmental Management Plan  
GIAC – Governance Improvement, Awareness Consultant  
GoTN – Government of Tamil Nadu  
GRC – grievance redress committee  
GRM – grievance redress mechanism  
PIU – Project Implementation Unit  
PMU – Project Management Unit  
RFCTLARR – Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement  
RoW – right of way  
SPO – Social Project Officer  
SPS – Safeguard Policy Statement  
SRSE – Social and Resettlement Safeguard Expert  
STP – sewage treatment plant  
TLC – Town Level Committee  
TNUFIP – Tamil Nadu Urban Flagship Investment Program  
TWADB – Tamil Nadu Water and Drainage Board  
UGSS – underground sewerage system  
ULB – urban local body

NOTE  
In this report, "$" refers to US dollars.

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EXECUTIVE SUMMARY

1. **Introduction.** The Tamil Nadu Urban Flagship Investment Program (TNUFIP) is designed under the multi-tranche financing facility (MFF) modality of ADB financing and will primarily focus on improvement of water supply and sewerage services in selected cities of the state. The TNUFIP is envisaged to be structured under three main components: (i) investment in municipal infrastructure namely water supply and sewerage, (ii) municipal reform-based activities, and (iii) technical assistance for design, supervision, program management, reforms, and climate change.

2. **Subproject Scope.** In Vellore, under TNUFIP, Phase-II is proposed which comprise 17 wards fully (17 to 24, 26, 27, 54 to 60) while an additional 15 wards partially (16, 25, 30, 31, 33, 35 to 41, 51 to 53). The Phase-II will cover around 26% of the total corporation area and 41% of the total population. The Phase II subprojects comprise: (i) Laying of around 209 kilometer (km) of sewer network of double walled corrugated (DWC)/reinforced cement concrete (RCC) pipes ranging from 200-1300 millimeter (mm) dia; (ii) Laying of 9.4 km of pumping mains of 300-800 mm dia; (iii) Construction of five sewage pumping stations; (iv) Construction of seven sewage lift stations; (v) Construction of 37 MLD sewage treatment plant (STP); and (vi) Provision of 43,270 number of house service connections.

3. **Key Findings.** There is no permanent/temporary land acquisition envisaged for implementation of proposed subproject components. Construction of proposed sewage pumping stations, lift stations and STP will be either accommodated within the existing facilities’ premises or on vacant Government lands. Widening of approach road to sewage pumping station-6 however envisages structure loss and permanent displacement/relocation of 22 households (87 affected persons), some belonging to joint families and the majority to nuclear families. These affected persons are staying at this location for more than 20 years and mainly engaged in daily wage activities at nearby market area. A majority of the affected persons have semi-pucca houses with no access to basic services such as individual toilets or water supply. All affected persons facing relocation impact are non-titleholders and are vulnerable. The affected persons facing relocation stay in a very unhygienic environment which poses many health risks as drain along the road frequently gets flooded and surplus water enter into houses. To estimate the losses a detailed socio-economic survey was conducted in October 2017 and findings are presented in subsequent sections of this report. In addition to permanent losses, laying of new sewer system will envisage temporary disruption to roadside economic activities. New sewer system will be laid within road rights-of-way (ROW) in the center of the road by cutting black top. In wider roads, like state highway and national highway, divided roads etc., sewers will be laid along the edge of the road, but mostly within the black top portion. Potential temporary impacts are assessed due to laying of new pipe networks. To estimate the potential temporary impacts, all roads/streets in project area were screened through transect walks for any encroachments on black top portion/ROW and detailed surveys were conducted for roads where temporary impacts were identified (November 2017). Based on this, a total of 44 roadside movable/transitory businesses that are currently within ROW are identified as potentially (temporarily) affected. These businesses are mainly (64%) tyre shops and the remaining (36%) include eateries, vegetable stalls, automobile works, petty shops etc. Seven percent affected persons are women headed households. Average monthly income for potentially affected BPL is estimated at ₹173 per day and overall average for all affected persons is ₹578 per day. The temporarily affected persons are expected to be able to continue with their business activity either at the same location or nearby; partial loss of income to each temporarily affected person is anticipated for the period of disruption.
4. **Recommended Actions.** A draft resettlement plan has been prepared for Vellore subproject components to mitigate permanent and temporary impacts envisaged during road widening, construction/pipe laying. This resettlement plan is in line with the ADB’s Safeguard Policy Statement (SPS), 2009 and Resettlement Framework prepared for TNUFIP. A total resettlement budget (only compensation and grievance redress mechanism or GRM costs) is estimated at ₹16.52 million (approximately $258,000) which includes compensation for loss of house, provision of new government housing, subsistence and transportation allowance to permanently displaced persons, livelihood losses for 25 days for temporary impacts. A detailed measurement survey will be conducted in sections ready for implementation, based on detailed design, and the draft resettlement plan updated, based on survey results. Information of permanently displaced persons will also be updated based on final estimate for losses, housing allotment etc. The draft resettlement plan will be reviewed by project management unit (PMU) and submitted to ADB for approval prior to start of construction. In line with the resettlement framework, the resettlement plan has also laid down the structured outline for required institutional and implementation arrangements with schedule, grievance redress mechanism, consultation and disclosure activities and monitoring and evaluation. A summary of resettlement framework and resettlement plan in local language will be disclosed to representatives of all key stakeholders through a city level stakeholder workshop. The resettlement plan, including entitlements and grievance redress mechanism will be disclosed to the affected persons and other stakeholders. A hard copy of summaries will also be made available at ULB offices and full documents will be uploaded at their/ ADB websites. Construction Management and Supervision Consultant’s Social and Resettlement Safeguard Expert (CMSC SRSE) and Project Implementation Unit’s Assistant Safeguard Officer (PIU’s ASO) together will be responsible for updation & implementation of Resettlement Plan. Project management unit’s Social Project Officer (PMU’s SPO) is responsible for approval and implementation monitoring of RPs. Governance Improvement and Awareness Consultant (GIAC) will assist in monitoring Resettlement Plan implementation.
I. RESETTLEMENT PLAN

A. Subproject Description

1. The proposed Tamil Nadu Urban Flagship Investment Program (TNUFIP) is aligned to support in the following: (i) urban infrastructure across the state improved and world class cities focusing on universal access to 24x7 water supply services and sanitation facilities including tertiary treatment of sewage to become engines for economic growth developed (Vision 2030, Government of Tamil Nadu, [GOTN]); (ii) five industrial corridors developed (GOTN Vision 2030); (iii) quality of life for all, especially the poor and the disadvantaged improved (Mission Statement and Guidelines, Atal Mission for Rejuvenation and Urban Transformation (AMRUT) Government of India, 2015); (iv) a clean and sustainable environment provided (Smart Cities - Mission Statement and Guidelines, Government of India, 2015). TNUFIP will focus on cities in five priority economic corridors: (i) Chennai-Hosur, (ii) Chennai–Tiruchirapalli, (iii) Coimbatore–Madurai, (iv) Coimbatore-Salem, and (v) Madurai–Thoothukudi. The reform-based component of the program will seek to provide results-based performance incentives to select cities and towns. The program shall also focus on transformative investments in 24X7 water supply, full sanitation coverage, smart water management, and urban climate change resilience drawing from the support of various Asian Development Bank (ADB) grant technical assistance. The TNUFIP is envisaged to be structured under three main components: (i) investment in municipal infrastructure namely water supply and sewerage, (ii) municipal reform-based activities, and (iii) technical assistance for design, supervision, program management, reforms, and climate change. TNUFIP will be implemented over an 8-year period beginning in 2018, and will be funded by ADB via its MFF. The impact of the TNUFIP will be improved liveability and resilience in urban areas of economic importance in Tamil Nadu.

2. Currently, only old part of the Vellore city (~6.5%) is covered under functional sewerage system which serves approximately 11% of the total population. It is proposed to provide sewerage system in the remaining areas of the city in two phases; Phase-II and Phase-III. Phase II will cover the area immediately surrounding the core city; on the southern side of Palar River while rest of the areas in the southern and northern outskirts will be taken up for sewerage in phase III. Under the ADB funded TNUFIP, it is proposed to develop underground sewerage system (UGSS) in phase II area. Phase-II comprises full coverage of 17 wards (17 to 24, 26, 27, 54 to 60) and partial coverage of an additional 15 wards (16, 25, 30, 31, 33, 35 to 41, 51 to 53). The Phase-II will cover around 26% of the total corporation area and 41% of the total population. Proposed subproject components of the Vellore Underground Sewerage System include:
   (i) Laying of around 209 km of sewer network of DWC/RCC pipes ranging from 200-1300 millimeter (mm) dia;
   (ii) Laying of 9.4 kilometers (km) of pumping mains of 300-800 mm dia;
   (iii) Construction of five sewage pumping stations;
   (iv) Construction of seven sewage lift stations;
   (v) Construction of 37 MLD sewage treatment plant (STP);
   (vi) Provision of 43,270 number of house service connections.

3. This Resettlement Plan is prepared for proposed sewerage subprojects under in Vellore under ADB financed TNUFIP (Map 1) and is in line with the Resettlement Framework prepared for the implementation of social safeguards under TNUFIP.¹

¹ Phase I of Vellore UGSS has been implemented under a government program. Phase II of Vellore UGSS is proposed to be implemented under tranche 1 of TNUFIP.
B. Scope of Land Acquisition and Resettlement

4. Consistent with the subproject selection criteria, rehabilitation is prioritized over new construction to avoid/minimize involuntary resettlement impacts. Construction of proposed sewage pumping stations, lift stations and STP will be either accommodated within the existing facilities’ premises or on vacant government lands. No permanent/temporary land acquisition is envisaged for implementation of proposed subproject components. However, widening of approach road to sewage pumping station-6 envisages permanent displacement of roadside squatters (22 households; 87 affected persons) from government land. Table 1 provides the details of proposed subproject components under ADB financing in Vellore and anticipated involuntary resettlement impacts.

Photograph 1: 22 Households along Approach Road to SPS-6

5. Potential temporary resettlement impacts are also identified due to rehabilitation and laying of sewer networks. The sewer lines are generally laid in the centre of the road/street; away from water supply and other utility lines to avoid problems in accessibility for future operation and maintenance (O&M). New sewer system will be hence laid within road rights-of-way (ROW) in the
centre of the road by cutting black top. In wider roads, like state highway and national highway, divided roads etc., sewers will be laid along the edge of the road, but mostly within the black top portion. Laying of sewers either in the middle of the road or at the edge of the road within the black top portion/ ROW will not require land acquisition or cause permanent displacement, but will cause temporary access disruptions and possible temporary income loss during construction. All roads/ streets in project area were screened through transect walks for any encroachments on black top portion/ ROW and detailed surveys were conducted for roads where temporary impacts were identified (November 2017), indicating potential temporary income loss to 44 roadside movable/transitory businesses. These impacts will be verified through detailed measurement surveys based on detailed design prior to implementation. The resettlement plan will be updated based on the results of detailed measurement surveys and census and socio-economic surveys of affected persons. These are majorly non-titled movable /transitory structures within the ROW.

**Map 2: Location of Non-notified Slum near Pandyan Drain**

6. Options for disposal of treated effluent from STP were studied for likely impacts. Potential impacts (associated with frequent flooding) on close to 50 households near Kalinjur lake that would occur if proper disposal of treated sewage is not planned, are proposed to be avoided through disposal of treated sewage directly into Pandyan drain, downstream of the settlement.

7. It was initially proposed that the treated sewage will be disposed into Kalinjur lake. This lake however overflows due to heavy rains in the region as connected with major channel from Palar River. Surplus water from Kalinjur lake is either diverted into Gopalsamudra lake or Pandyan drain; located across a street. All the outlets of Gopalsamudra lake are currently encroached while the Pandyan drain (near slum) is a kutch drain with no proper bund or wall. Overflow of surplus water from Kalinjur, Gopalsamudra or Pandyan drain can easily flood slum area which is situated exactly between the Kalinjur and Gopalsamudra lake/Pandyan drain. Currently there is no adequate infrastructure available to deal with overflowing water which can pose risk of frequent flooding and can have additional impacts on the non-notified slum. Considering this, design options were studied and it was proposed to dispose treated effluent directly into Pandyan drain, downstream of the non-notified slum. At this point the Pandyan drain has adequate capacity and is well protected with walls which would allow flow of treated sewage without any overflow. The bid documents will ensure that these design solutions are incorporated.
8. In line with the ADB’s Safeguard Policy Statement (SPS)-2009, and based on the identified impacts, the Vellore subproject can be classified as Involuntary Resettlement Category “B”. Resettlement Plan preparation is required for Vellore subproject components in line with the ADB’s SPS-2009 and resettlement framework prepared for TNUFIP. This resettlement plan is prepared for Vellore UGSS.

9. To further minimize construction impacts, wherever possible, work will be executed during early hours of the day in order to avoid inconveniences to the public as well as traders and vendors. All safety norms would strictly be adhered to depending on the magnitude of work and the sensitivity of the location. Appendix 2 provides sample impact minimization measures.
template to be followed for pipe laying. The project implementation unit (PIU) will also ensure that all the necessary rules related to safety and security of the public and residents are followed by the contractor. The actual dates of construction schedule with respect to peak business hours, festival time, and special business days will be discussed with vendors, squatters, market committee members, and residents, and accordingly construction activities will be planned. After laying pipes the lane/road will be restored to its original condition (including bitumen, cement concrete and cement concrete interlocking tiles as applicable).

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2 This will be updated based on the revised project scope and detailed drawings before project implementation.
Table 1: Proposed Subproject Components in Vellore

<table>
<thead>
<tr>
<th>Proposed Subproject Components</th>
<th>Scope of Land Acquisition and R&amp;R</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> Sewer Network. Laying of new 209 km of sewer network of DWC/CI pipes ranging from 200-1,300 mm dia.</td>
<td>Sewer pipes will be buried below in a trench in the middle of public roads within black top portion/ROW. For wider/divided roads sewers will be buried below in a trench on the edge of the road but still within the black top portion; within the existing ROW. Temporary impacts on movable structures within ROW are envisaged on 44 affected persons.</td>
<td>Temporary economic impacts to 44 vendors</td>
</tr>
<tr>
<td><strong>2</strong> Pumping Mains. Laying of new 9.4 km pumping main of CI pipes ranging from 300-800 mm dia.</td>
<td>Pumping mains will be buried below in a trench in the middle of the road within ROW. Pumping main from SPS 5&amp;6 will be laid partly along the bank of Palar River and PWD permission will be required to cross the river bund. No LA and R&amp;R envisaged. NOC/EUP will be required for PWD land.</td>
<td>No involuntary resettlement/Indigenous Peoples impacts anticipated</td>
</tr>
<tr>
<td><strong>3</strong> Sewage Pumping Stations (SPS). Construction of five sewage pumping stations at various locations (Refer Appendix 3 for layout drawings, site photos, ownership records and EUPs/NOCs).</td>
<td>Sewage Pumping Station-3. SPS-3 is located at Alamelumanga puram and belongs to Vellore Corporation in a newly developing residential area. The land is currently classified as revenue poromboke. Construction of SPS-3 will require total area of 226 sq. m. and adequate land is available. Site is currently vacant and covered with shrubs and bushes. No LA and R&amp;R envisaged. Sewage Pumping Station-4. SPS-4 is located at Vasanatham Nagar, Sathuvachari and the land belongs to Vellore Corporation. Construction of SPS-4 will require total area of 1,034 sq. m. and adequate land is available. Adjacent to identified land is private school which currently use proposed SPS site as their play area. Adequate buffer needs to be maintained from nearby residences and school. No LA and R&amp;R envisaged. Sewage Pumping Station-5. SPS-5 is located at Sathuvachari along the River; adjacent to municipal solid waste vermicomposting unit and close to water supply head works. The land belongs to Vellore Corporation (Ward No-1; Block No-37; TS No-3038/3B, 3037/3A, 3040, 3068, 3069, 3071/1, and 3081/1). Construction of SPS-5 will require total area of 1,821 sq. m. and adequate land is available. No LA and R&amp;R envisaged. Sewage Pumping Station-6. SPS-6 is located near Kural theatre Shenbakkam along the drain. The land belongs to Vellore Corporation (Ward No-5; Block No-14; TS No-613, 614, and 621) and is currently classified as revenue poromboke (wasteland). Construction of SPS-6 will require total area of 1,462 sq. m. and Permanent displacement of 22 households-87 (M=40 F=47) affected persons (squatters on government land). One of the affected households belongs to scheduled tribe category.</td>
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</tr>
</tbody>
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3 This assessment is based on field visits to each proposed STP, SPS and LS site and consultations.
<table>
<thead>
<tr>
<th>Proposed Subproject Components</th>
<th>Scope of Land Acquisition and R&amp;R</th>
<th>Summary</th>
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<tbody>
<tr>
<td>adequate land is available. No LA and R&amp;R envisaged for the SPS-6 construction; however, the current approach road to the site (along the drain) is very narrow and needs widening for construction and later for O&amp;M of SPS. Widening of approach road envisages permanent displacement of total 22 households-87 affected persons and associated structure and cattle loss (squatters on government land). <strong>Sewage Pumping Station-7.</strong> SPS-7 is located inbetween Pillaiyarkoil street &amp; Poonthottam at Velapadi and the land belongs to Vellore Corporation (Ward No-4, Block No-36, TS No-2216/1). Construction of SPS-7 will require total area of 594 sq. m. and adequate land is available. A cow shed has recently been put up by a neighbouring owner as his house is demolished for new construction and he is staying in a rented house nearby where there is no adequate space is available for cattle (4nos.). This will be voluntarily removed before the start of civil work, as indicated during consultation and no compensation is expected by the cattle shed-owner. No LA and R&amp;R envisaged.</td>
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</table>
| **4 Lift Stations (LS).** Construction of 7 new lift stations at various locations of 2.5-2.5 m. collection well diameter. (Refer Appendix 3 for site photos) | Lift well will be constructed below municipal roads (like manholes) where the sewer ends/terminates into the lift well. Pumps will be installed in the well (underground), and a control panel box will be installed near the well/on the side of the road. No LA and R&R envisaged. Lift stations are proposed at the following locations:  
(i) Lift Station 7 is located at Sathuvachari Kurunji Nagar near Palar River in residential area.  
(ii) Lift Station 8 at proposed at Droupadi Amman Street, Shenbakkam at the junction.  
(iii) Lift Station 9 is proposed at Pillaiyar Koil Street, Shenbakkam. This road is adjacent to NH-46. Babasaheb Ambedkar statue at one road end. It is advisable to locate LS further down the road away from NH as some NH land may be present.  
(iv) Lift Station 10 near Bangalore Road at Konavattam (Veerawamy Street), This is close to Florence Shoe Company  
(v) Lift Station 11 is located at Jeevarathinam Street, Konavattam in congested residential area.  
(vi) Lift Station 12 is located at Subramaniya Iyyar Street within residential area. | No involuntary resettlement/Indigenous Peoples impacts anticipated |
<table>
<thead>
<tr>
<th>Proposed Subproject Components</th>
<th>Scope of Land Acquisition and R&amp;R</th>
<th>Summary</th>
</tr>
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<tbody>
<tr>
<td>(vii) Lift Station 12a is located near Thideer Nagar OHT, Paraiedu in the center of road along which there is residential landuse. There are small scale industries nearby such as recycling units, tannery etc. Surrounding area is low lying land and gets flooded during heavy rains.</td>
<td>Inspection chambers and house service connections will be provided within individual’s property boundary. No LA and R&amp;R envisaged.</td>
<td>No involuntary resettlement/Indigenous Peoples impacts anticipated</td>
</tr>
<tr>
<td><strong>5 House Service Connections. Provision of 43,270 house service connections with inspection chambers</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>6 Sewage Treatment Plant (STP). Construction of 37 MLD STP.</strong> (Refer Appendix 3 for layout drawings, site photos, and ownership records).</td>
<td>Proposed STP site is located at Kigitapparai on the northern (left) bank of River Palar and land belongs to Vellore Corporation. STP site is located adjacent to a solid waste management (segregation) facility. A part of the site is used by women SHGs for cultivating vegetables. These SHGs are also involved in waste segregation and composting. Since the available land is a huge area; these SHG activities will continue to operate at the site. Adequate land is available for the construction of STP and is free of any encumbrances. No LA and R&amp;R envisaged.</td>
<td>No involuntary resettlement/Indigenous Peoples impacts anticipated Impact on a non-notified slum near Kalinjur lake will be avoided by disposing treated sewage downstream of settlement in Pandyan drain.</td>
</tr>
</tbody>
</table>

CMWSSB = Chennai Metropolitan Water Supply and Sewerage Board, CPCL = Chennai Petroleum Corporation Limited, CPR = Common Property Resource, DWC = double walled corrugated, EUP = enter upon permission, GCC = Greater Chennai Corporation, HR&CE = Hindu Religious & Charitable Endowment, km = kilometer, LA = land acquisition, mld = million liters per day, m = meter, mm = millimeter, NOC = no objection certificate, OHT = overhead tank, ROW = right of way, R&R = resettlement and rehabilitation, SPS = Safeguard Policy Statement, STP = sewage treatment plant, UGT = underground tank

Source: Vellore UGSS DPR, VMC and site visits.
## Table 2: Summary of Impacts

<table>
<thead>
<tr>
<th>Impacts</th>
<th>Details</th>
<th>Remark</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Permanent/ temporary land acquisition</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>2 Loss of structure</td>
<td>22 structures</td>
<td>22 structures are occupied by 22 households (87 affected persons), some of which are joint families while the majority comprise nuclear families. A detailed survey will be conducted before updating the resettlement plan to identify and incorporate specific needs of joint families, if any.</td>
</tr>
<tr>
<td>3 Relocation impact</td>
<td>22 households</td>
<td>87 affected persons, all belonging to vulnerable households.</td>
</tr>
<tr>
<td>4 Loss of cattle</td>
<td>4 cows</td>
<td>Two households have cattle. These households have indicated that they use milk for own purposes and share within the community. Households with cattle will be allowed to keep/sell cattle depending on the suitability of maintaining the cattle at new government housing. If allowed to retain their cattle, these households will be allotted apartments on the ground floor. In the event that the cattle are not allowed at the relocation site, a compensation at replacement cost of cattle will be offered (in addition to the skill training with job placement for any one member of the family, to which all vulnerable households are entitled). Further discussions and stakeholder consultations will be required during resettlement plan updating to arrive at the most suitable option.</td>
</tr>
<tr>
<td>4 Temporary impacts on roadside businesses</td>
<td>44 affected persons</td>
<td>44 roadside businesses will be temporarily affected during pipelaying; 9% are vulnerable affected persons.</td>
</tr>
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</table>

Source: Socioeconomic survey.
C. Socioeconomic Information and Profile

1. Permanent Impacts

10. Widening of approach road to SPS-6 envisages permanent impacts on roadside houses which are situated along the road in linear fashion. These houses need to be demolished completely which will require relocation of around 22 households (87 affected persons) to a nearby location that has been identified. A detailed socioeconomic survey was conducted on 17 October 2017 for the identified affected persons. Survey indicated that a majority of the households (91%) are residing at this place for more than 25 years while the remaining have established houses in last 10-20 years. Proximity to market areas where daily wage jobs can be easily obtainable was expressed as major reason for settling at the location. Consistent with this; as high as 44% of the total working population was found working as daily wage labourers in nearby market areas. Workforce participation was also recorded as high where 42% of the total population in working age group of 25-60 years were found to be engaged in income generating activities (Appendix 1).

11. Seventy six percent of the affected persons are literate however only 7% have reached graduation level. Consistent with this, not many affected persons are involved in skilled or formal jobs. Only around 6% of affected persons are either working as drivers, electricians or as teachers. In line with the informal nature of jobs, many households (55%) earn income below poverty line. Average per capita income per month was estimated at ₹1,564. Affected households possess basic household assets such as TV, fridge, fan, two wheelers etc. Two households indicated that they have cattle and use milk for their own purpose.

12. All the identified affected persons belong to Hindu community and are Tamil speaking. Twenty households are from scheduled caste (SC) category; one household is from scheduled tribe (ST) category while the remaining one household is from most backward category (MBC). Survey found a total of six households as women headed households of which three are sole breadwinners or chief wage earners. Considering the socio-economic background and residential status as squatters; all households were identified as vulnerable as per ADB’s SPS 2009. Appendix 1 provides further details on socioeconomic information including education and occupation of permanently affected people.

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4 As per data published by the Planning Commission, Government of India, in 2011-12, poverty line in urban Tamilnadu was ₹993 per capita per month. On adjusting for inflation, this works out to ₹1,406 per capita per month in 2017, or a monthly household income of ₹5,540 for BPL households, considering the average urban household size in the state per Census 2011. Hence, a majority of the identified potentially temporarily impacted persons are estimated to be below poverty line, based on limited data available.

5 The ST household comprises two members (husband and wife) who moved to the location 30 years ago, speak the local language (Tamil) and are well integrated with the community in which they presently live. The household belongs to vulnerable category. The head of household works as wage earner (coolie). The ST household was found to possess no different characteristics from those of mainstream society.
2. Temporary Impacts

13. Transect walks identified a total of 44 affected persons whose business are likely to be temporarily affected during pipe laying, as they carry their activities within/very close to ROW. These businesses are mainly (64%) tyre shops and the remaining (36%) include eateries, vegetable stalls, automobile works, petty shops etc. Some of the surveyed affected persons indicated that they sometimes make rounds in nearby areas to sell their wares though their location is generally fixed. As high as 86% use road ROW for storage or display of wares, which they can easily shift, given adequate notice. The main business activity takes place within the shops and is likely to be able to continue. Only 7% of affected persons have small non-movable structures (like kiosks) which can be lifted and placed nearby for the period of construction, from where they can continue their business.⁶

![Figure 4: Type of Business](image)

![Figure 5: Type of Structure](image)

![Figure 6: Monthly Household Income](image)

⁶ All the above-mentioned businesses are anticipated to face partial loss of income for a period of 25 days during construction.
14. Street vending is quite a common practice in many cities of the state including Vellore and close to 92% of the affected persons indicated that they are doing their business at present location for more than 10 years. The remaining 18% said they have moved to their respective locations in the last five years.

15. A majority of the temporarily affected persons have roadside shops and have extended their activities on the road. This means these shops have established businesses and have higher incomes. Around 79% of the affected persons indicated that they earn monthly income above ₹10,000. Only 7% of affected persons earn monthly income between ₹2,500-5,000 which is considered below poverty line. Average monthly income works out at ₹15,034 with minimum at ₹3,500 and maximum at ₹25,000. Considering work week of six days (26 days per month), average daily income is estimated at ₹578 for all affected persons. The overall average is slightly lower than the notified minimum wage rate at ₹643.

16. Of the temporarily affected persons, only around 2% affected persons belong to scheduled caste category while the remaining belongs to other backward classes (OBC-98%). No scheduled tribes (STs) were identified among the temporarily affected persons during resettlement surveys. Around 7% of the affected person households have a woman as sole earner or chief breadwinner. Total vulnerable affected persons comprise 9% of the total surveyed affected persons.

17. Transect walk data/analysis will be updated based on detailed measurement surveys (DMS) conducted road/section wise where pipelines will be laid. DMS will be conducted before start of construction and revised resettlement plan will be submitted to ADB for approval. A 100% census and socioeconomic surveys will be undertaken to register and document the status of affected people (affected persons) within subproject impact area. Any temporary impacts or costs incurred by affected persons will be identified through the DMS and compensated at replacement cost, in line with the principles of the Resettlement Framework.

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7 As per data published by the Planning Commission, Government of India, in 2011-12, poverty line in urban Tamilnadu was ₹993 per capita per month. On adjusting for inflation, this works out to ₹1,406 per capita per month in 2017, or a monthly household income of ₹5,540 for BPL households, considering the average urban household size in the state per Census 2011. Hence, a majority of the identified potentially temporarily impacted persons are estimated to be below poverty line, based on limited data available.

8 Minimum wage rate estimated based on: Weblink: HTTP://CMS.TN.GOV.IN/SITES/DEFAULT/FILES/GO/LABEMP_E_62_2017_2D_PDF.PDF
D. Information Disclosure, Consultation and Participation

18. Consultation with the primary and secondary stakeholders is an important tool for successful preparation and implementation of resettlement plan. The key stakeholders to be consulted during sub-project preparation, resettlement plan preparation and implementation, and program implementation include:
   (i) Heads and members of households likely to be affected;
   (ii) program beneficiaries, groups/clusters of affected persons;
   (iii) Local voluntary organizations and Community-Based Organizations (CBOs),
   (iv) Government agencies and departments; and
   (v) Major project stakeholders, such as women, trader’s associations, community based organizations, etc.

19. Types of consultations during project preparatory technical assistance (PPTA) stage are presented in Table 3. Consultations with potentially temporarily affected persons were conducted during transect walks, while detailed socio-economic surveys and consultations were conducted with affected persons that will be permanently displaced. Consultations with permanently displaced persons at SPS-6 site approach road indicated that their current place of residence is unhygienic and pose many health risks to them. The infrastructure and housing status in the settlement is very poor. Houses lack proper structure/foundation, all households access a public water tap which is at least 500m away and the entire settlement resorts to open defecation in the absence of toilet facilities. Wastewater from the houses is discharged into an adjacent drain. This drain, which runs along the settlement, is highly polluted and as reported by the people, has caused the spread of many infectious diseases. Most of the residents, especially children fall sick often and fever, cold and cough are common occurrences. A significant number of people also reported respiratory problems. The water overflows from the drain during rainy season and enters into houses and they all are forced to move to a nearby Church for shelter for some days. Considering this and the fact that they have no legal title to the current place of residence, all affected persons indicated willingness to shift to government provided housing in the vicinity\(^9\). The project will provide them with permanent housing with all basic infrastructure (water, sanitation, electricity) and ownership title after successfully completing five years of stay. The APs expressed that their relocation should be smooth, not in the middle of their children’s academic year and should not burden them with additional financial liabilities (Appendix 3). It was informed to the affected persons that they will be further closely consulted during actual implementation of resettlement plan and they will have access to the grievance redressal system for any issues faced. It was also informed to As that they will not be asked to pay any charges towards housing; but may have to pay minimum regular maintenance charges post-relocation.

20. The concerns expressed by temporarily affected persons mainly included traffic disruptions and temporary impacts on livelihood, including duration of impact (Appendix 3). It was informed to surveyed potential roadside affected persons that appropriate measures will be undertaken during construction to minimize impacts. (including scheduling of activities during the early morning and reducing construction activities during the peak business hours). It was also informed that, if despite mitigation measures, there were any temporary impacts on livelihood; these would be compensated in accordance with the resettlement plan’s entitlement matrix.

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\(^9\) Multi storyed housing is under construction under the Pradhan Mantri Awas Yojana in Thottapalayam, Vellore and is expected to be completed in April 2018. The housing complex is located at a 3km driving distance and about 2km walking distance from the present location of the affected persons and is therefore not anticipated to cause major disruptions.
21. Permanently displaced affected persons will be consulted regularly throughout resettlement plan implementation to ensure smooth transition to the new relocation site. The key concerns expressed by affected persons were that (a) they would prefer their houses to be not too far from their present location and (b) they would prefer that new housing be allotted in the same apartment block, making it possible to stay together at the new location. It was explained that the PIU would be responsible to accommodate their preference in coordination with Tamil Nadu Slum Clearance Board. The location of new housing was also discussed. Further consultations with temporarily affected persons will include focus group discussions (FGDs) and structured census surveys parallel to detailed measurement survey in sections ready for implementation before the project implementation. Consultations with all affected people will be carried out by CMSC SRSE who will work closely with PIU ASO and PMU SPO. A city-wide stakeholder consultation involving representatives from all stakeholder groups to brief them about the technical details of project and project implementation cycle; project benefits as well as adverse impacts envisaged during construction; environmental and social safeguards, gender inclusion, community participation aspects built into the project etc. is proposed. Minutes of consultation meetings will be added to the updated resettlement plan.

22. At this PPTA stage disclosure activities include dissemination/ distribution of summary of resettlement framework and resettlement plan in local language to key stakeholders including affected persons. The approved RF/resettlement plan (full documents) will also be disclosed on ADB and local government’s websites and will be available in key local/state government offices. During subproject implementation, construction schedules will be informed to all residents (including affected persons) prior to the commencement of pipe laying through signboards. The signboards will be in local language and will include at minimum: (i) section to be affected, (ii) start and end dates, (iii) information on traffic rerouting if any, and (iv) contact information for questions/grievances.

### Table 3: Consultation and Disclosure Activities during Project Preparatory Technical Assistance Stage

<table>
<thead>
<tr>
<th>Activities</th>
<th>Details</th>
<th>Responsible Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preliminary awareness about the project activities</td>
<td>City visits and series of meeting with key stakeholders (ULB, TWADB, DC etc. officials)</td>
<td>PPTA team</td>
</tr>
<tr>
<td>Profiling of potential affected persons</td>
<td>Undertake transect walks and screening of project impact area to identify potential affected persons and record their socio-economic and business profile.</td>
<td>PPTA team</td>
</tr>
<tr>
<td>Detailed Socio-economic surveys and consultations for permanently displaced affected persons</td>
<td>Establish baseline, identify and estimate losses, identify relocation site and understand willingness of affected persons to relocate to new housing.</td>
<td>ULB, TNUIFSL, PPTA team</td>
</tr>
<tr>
<td>City wide stakeholder consultation</td>
<td>Dissemination of project related technical and other information to representatives of all key stakeholders (at one platform) and disclosure of summary of social safeguard documents in local languages</td>
<td>PPTA team/relevant government departments</td>
</tr>
</tbody>
</table>

CMWSSB = Chennai Metropolitan Water Supply and Sewerage Board, PPTA = project preparatory technical assistance, TNUIFSL = Tamil Nadu Urban Infrastructure Financial Services Ltd., ULBs = urban local body.

23. Continued involvement of those affected by the sub-project will be ensured. An intensive information dissemination and feedback campaign for affected persons will be conducted by the PIU from the time of resettlement plan preparation to implementation and monitoring. The proceedings of such campaigns shall be documented. All the comments made and concerns
raised by the affected persons will be documented in the sub-project records and summarized in sub-project monitoring reports.

24. During revised resettlement plan preparation, PIU/PMU will be responsible for issuing various required public notices. For the temporary impacts the date/period of census surveys will be considered as cut-off date. Cut-off-date for temporary impacts will be communicated to affected persons through CMSC, and also by putting up printed information in project affected area at a common place accessible to affected persons. Similarly, list of temporary affected persons will be published at common places with contact details of CMSC/PIU officials. The list will be put up area wise and at a time for the entire city. This will avoid affected persons moving into other areas and to identify any duplication of affected persons. CMSC will facilitate affected persons to access lists in their area and get confirmation on any duplication, missing/absent affected persons. For permanently displaced affected persons PIU in coordination with PMU will issue various notices such as for final listing of affected persons, allotment of government housing, demolishing of existing houses and shifting to relocation site, schedule of skill training programme etc.

25. Additionally, draft/final resettlement framework/resettlement plan will be made available in PIU and PMU offices. The resettlement framework and resettlement plan will be disclosed in ADB’s website and the PMU websites. Finalized resettlement plans will also be disclosed in ADB’s website, PMU websites, and PIU or ULB websites; and information dissemination, through subproject specific leaflets and public announcements, and consultation will continue throughout program implementation. The project leaflets will be distributed by GIAC/CMSC to the affected communities for their information. A sample project information dissemination leaflet is attached in Appendix 5.

E. Grievance Redress Mechanism

26. A common GRM will be in place to redress social, environmental or any other project related grievances. The GRM described below has been developed in consultation with stakeholders. Public awareness campaign will be conducted to ensure that awareness on the project and its grievance redress procedures is generated. The campaign will ensure that the poor, vulnerable and others are made aware of grievance redress procedures and entitlements per project entitlement matrix, and PMU and concerned PIUs will ensure that their grievances are addressed.

27. Affected persons will have the flexibility of conveying grievances/suggestions by dropping grievance redress/suggestion forms in complaints/suggestion boxes or through telephone hotlines at accessible locations, by e-mail, by post, or by writing in complaints register in ULB or PIU or implementing agency offices. PIU Safeguards officer will have the responsibility for timely grievance redress on safeguards and gender issues and for registration of grievances, related disclosure, and communication with the aggrieved party.

28. GRM provides an accessible, inclusive, gender-sensitive and culturally appropriate platform for receiving and facilitating resolution of affected persons’ grievances related to the project. A two-tier GRM is conceived, one, at project level and another, beyond project level. For the project level GRM, a grievance redress committee (GRC) will be established in PIUs; Safeguards officer, supported by the social, gender and environmental safeguards specialist of CMSC will be responsible for creating awareness among affected communities and help them through the process of grievance redress, recording and registering grievances of non-literate affected persons.
29. GRM aims to provide a time-bound and transparent mechanism to voice and resolve social and environmental concerns linked to the project. All grievances – major or minor, will be registered. Documentation of the name of the complainant, date of receipt of the complaint, address/contact details of the person, location of the problem area, and how the problem was resolved will be undertaken. PIU will also be responsible for follow-through for each grievance, periodic information dissemination to complainants on the status of their grievance and recording their feedback (satisfaction/dissatisfaction and suggestions).

30. In case of grievances that are immediate and urgent in the perception of the complainant, the contractor, and supervision personnel of the CMSC and PIU will resolve the issue on site, and any issue that is not resolved at this level will be dealt at PIU head level for immediate resolution. Should the PIU fail to resolve any grievance within the stipulated time period, the unresolved grievances will be taken up at ULB level. In the event that certain grievances cannot be resolved even at ULB level, particularly in matters related to land purchase/acquisition, payment of compensation, environmental pollution etc., they will be referred to the district level GRC headed by the District Collector. Any issue which requires higher than district level inter-departmental coordination or grievance redress, will be referred to the state level Steering Committee.

31. GRC will meet every month (if there are pending, registered grievances), determine the merit of each grievance, and resolve grievances within specified time upon receiving the complaint-failing which the grievance will be addressed by the state-level Steering Committee. The Steering Committee will resolve escalated/unresolved grievances received.

32. Composition of Grievance Redress Committee. GRC will be headed by the District Collector, and members include: PIU head, Safeguards Officer of PIU, representative of TNPCB, one elected representative/prominent citizen from the area, and a representative of affected community. GRC must have a women member.

33. State Level Steering Committee will include Commissioner of Municipal Administration as chair, member include managing directors of TNUIFSL, CMWSSB, TWAD Board and others as applicable.

34. Areas of Jurisdiction. The areas of jurisdiction of the GRC, headed by the District Magistrate will be (i) all locations or sites within the district where subproject facilities are proposed, or (ii) their areas of influence within the District. The SC will have jurisdictional authority across the state (i.e., areas of influence of subproject facilities beyond district boundaries, if any).

35. The multi-tier GRM for the project is outlined below (Error! Reference source not found.), each tier having time-bound schedules and with responsible persons identified to address grievances and seek appropriate persons' advice at each stage, as required. The GRC will continue to function throughout the project duration. The implementing agencies/ULBs shall issue notifications to establish the respective PIU level grievance redress cells, with details of composition, process of grievance redress to be followed, and time limit for grievance redress at each level.
   (i) 1st level grievance. The contractor and CMSC supervision personnel and PIU supervision personnel can immediately resolve issues on-site in consultation with each other, and will be required to do so within 3 days of receipt of a complaint/grievance.
(ii) **2nd level grievance.** All grievances that cannot be redressed within 3 days at field/ward level will be brought to the notice of Social Safeguards Officer (SSO) of PIU. PIU will resolve the grievance within 7 days of receipt of compliance/grievance in discussion with the CMSC and the Contractor. PIU SSO will be supported by the CMSC SSS at this stage.

(iii) **3rd level grievance.** All the grievances that are not addressed by PIU within 7 days of receipt will be brought to the notice of the Town Level Committee (TLC), of which ULB Commissioner will be the Chairperson, and will be assisted by the concerned city level engineers. TLC will meet twice a month and determine the merit of each grievance brought to the committee. The PIU SSO will be responsible to see through the process of redressal of each grievance. The TLC will resolve the grievance within 15 days of receiving the complaint.

(iv) **4th level grievance.** All grievances that are not addressed by the TLC within 15 days, and which require the District Collector’s intervention, will be escalated to the district level Grievance Redress Committee (GRC), chaired by the District Collector. The district level GRC will have the District Collector as chair, PIU head as Convenor, and Safeguard Officers of the PIU, representative of TNPCB, one elected representative, one prominent person/member of the community, and a representative of affected persons/community as members. At least one member of the GRC will be a woman. The GRC will resolve the grievance within 30 days of registration with it.

(v) **5th level grievance.** Any grievance that remains unresolved by the GRC will be escalated to the state level steering committee.

**Figure 7: Grievance Redress Process**

36. The project GRM notwithstanding, an aggrieved person shall have access to the country's legal system at any stage, and accessing the country's legal system can run parallel to accessing
the GRM and is not dependent on the negative outcome of the GRM. In case of grievance related to land acquisition, resettlement and rehabilitation\textsuperscript{10}, the affected persons will have to approach a legal body/court specially proposed under RFCTLARR, 2013; Land Acquisition, Rehabilitation and Resettlement Authority (LARRA).\textsuperscript{11}

37. In the event that the established GRM is not in a position to resolve the issue, the affected person also can use the ADB Accountability Mechanism through directly contacting (in writing) the Complaint Receiving Officer at ADB headquarters or the ADB India Resident Mission (INRM). The complaint can be submitted in any of the official languages of ADB’s developing member countries. The ADB Accountability Mechanism information will be included in the project-relevant information to be distributed to the affected communities, as part of the project GRM.

38. **Recordkeeping.** Records of all grievances received, including contact details of complainant, date the complaint was received, nature of grievance, agreed corrective actions and the date these were effected and final outcome will be kept by PIU (with the support of CMSC) and submitted to PMU.

39. **Information dissemination methods of the GRM.** The PIU, assisted by experts will be responsible for information dissemination to affected persons and general public in the project area on GRM. Public awareness campaign will be conducted to ensure that awareness on the project and its grievance redress procedures is generated. The campaign will ensure that the poor, vulnerable and others are made aware of grievance redress procedures and entitlements per this resettlement framework including contact details of officials/members of GRC, whom to contact, and when, where/how to register grievance, various stages of grievance redress process, time likely to be taken for redress of minor and major grievances, etc. Grievances received and responses provided will be documented and reported back to the affected persons. The number of grievances recorded and resolved and the outcomes will be displayed/disclosed in the PIU, offices, ULB notice boards and on the web, as well as reported in the semi-annual environmental and social monitoring reports to be submitted to ADB. A Sample Grievance Registration Form has been attached in Appendix 6.

40. **Periodic review and documentation of lessons learned.** The PMU will periodically review the functioning of the GRM and record information on the effectiveness of the mechanism, especially on the PIU's ability to prevent and address grievances.

41. **Costs.** All costs involved in resolving the complaints (meetings, consultations, communication and reporting/information dissemination) will be borne by the respective PIU.

\textsuperscript{10} The Authority admits grievance only with reference to the LA and R&R issues under the RFCTLARR, 2013.

\textsuperscript{11} The authority shall consist of one person called Preceding Officer. Preceding Officer shall be either District Judge or qualified legal practitioner with minimum seven years of service and shall be appointed in consultation with the Chief Justice of the High Court within the Project jurisdiction. He shall hold the officer for three years and shall be supported by Registrar and other officers. The Authority shall, for the purposes of its functions under this Act, shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908. Authority (GRS) shall dispose any matter received within six months. All proceedings before Authority shall be judicial proceedings and shall take place in public. No civil court (other than High Court or the Supreme Court) shall have jurisdiction to entertain any dispute relating to land acquisition in respect of which the Collector or the Authority is empowered by or under this Act, and no injunction shall be granted by any court in respect of any such matter. Applications first go to Collector and within 30 days he can refer (if required) to the Authority. Such application can be made within six weeks by the applicant (if he or representative is personally present) after the date of award, and in other cases within six months. Collector may also accept any application within one year if feels appropriate. Interests are payable for delayed and excess payments. Payment of award into their bank accounts. Any disputed payments etc. shall be deposited with the Authority.
F. Legal Framework

42. The policy framework and entitlements for the TNUIFIP are based on:
   (ii) Environmental and Social Management Framework (ESMF) of TNUIFSL;
   (iii) ADB’s Safeguard Policy Statement (SPS), 2009; and
   (iv) The agreed entitlement matrix and Resettlement Framework.

43. The salient features of Government and ADB polices are summarized below. The resettlement principles and procedures to be followed for social safeguards under TNUIFP are detailed out in the RF. Core involuntary resettlement principles for the TNUIFIP to be followed for each sub-project, including sample sub-projects are: (i) Screening of the project to identify involuntary resettlement impacts and risks. Minimizing and avoiding land acquisition and resettlement impacts of each subproject by exploring all viable alternative designs; (ii) where unavoidable, time-bound resettlement plans (will be prepared and affected persons will be assisted in improving or at least regaining their pre-program standard of living; (iii) full information and close consultations with affected persons including consultation with affected persons on compensation, disclosure of resettlement information to affected persons, and participation of affected persons in planning and implementing sub-projects will be ensured; Disclose a draft resettlement plan, including documentation of the consultation process in a timely manner to affected persons and other stakeholders. Disclose the final resettlement plan and other documents such as the monitoring reports to affected persons and other stakeholders; (iv) Where the resettlement impacts are unavoidable, the DPs should be assisted in improving or at least regaining their standard of living; (v) Vulnerable groups comprising below poverty line households, including female-headed households, disabled persons, elderly, children, landless, non-titled households with no tenure security, and scheduled tribe households will be given special assistance; (vi) payment of compensation to affected persons including non-titled persons (e.g., informal dwellers/squatters, and encroachers) for acquired assets at replacement cost; (vii) payment of compensation and resettlement assistance prior to the contractor taking physical acquisition of the land and prior to the commencement of any construction activities; (viii) provision of income restoration and rehabilitation; and (ix) establishment of appropriate grievance redress mechanisms.

44. A detailed description of each compensation measure and assistance is provided in the Entitlement Matrix attached in resettlement framework while a Vellore subproject specific/applicable entitlement matrix is given in Table 4. Affected persons will be entitled to a combination of compensation measures and resettlement assistance, depending on the nature of ownership rights of lost assets and scope of the impact, including social and economic vulnerability of the affected persons.

G. Entitlements, Assistance and Benefits

45. All losses (assets, incomes and livelihoods) will be compensated based on the replacement cost principle, in accordance with ADB SPS. The entitlement matrix defines eligibility, compensation and entitlements due against each type of loss.

46. Income restoration schemes will be designed in consultation with affected persons, and skill training will be based on a training needs assessment. The objective of income restoration is to ensure that each affected person will have at least the pre-project level income or improved
income after the subproject. As per GOTN’s current practice, skill training institutes will be contractually bound for job placement as well. Elderly or physically challenged APs who are unable to undergo training and/or access job placement, will be assisted to access government social welfare programs.

1. **Permanent Impacts**

47. Widening of approach road to SPS-6 site along the drain will require demolition of houses and shifting of around 22 households. All these households envisage loss of housing and associated immovable assets. None of the households currently have any legal title to the land/house as they have squatted in government land for more than 20 years. Though in many houses cement blocks and cement is used for walls and floor, houses lack proper foundation and structure. A close to 59% houses still have temporary roof; thatch or sheets. In terms of area, houses are comparatively small; 77% households reside in area less than 500 ft².

**Photograph 3**

![Housing Typology](image)

**Figure 8: Housing Typology**
48. None of the households have toilet facility within the house and all have no recourse other than open defecation. Rarely adults from few houses use public toilet which is far and ill maintained. All households get water from public standpipe which is located at the end of the road stretch at 500m. Almost all households have electric meters and pay bimonthly electricity bills. Households indicated that they have built the houses step-by-step with their own money and no debt is outstanding for the housing.

49. It is proposed that all the affected households\textsuperscript{12} will be relocated to the government’s low income housing project (multi storyed apartments) under construction by Tamil Nadu Slum Clearance Board (TNSCB),\textsuperscript{13} situated at a walking distance of 2km and driving distance of around 3 Km from the existing location, at Thottapalayam. This TNSCB housing is currently under construction and likely to get completed by April 2018. A ground plus three-story block will have total of 224 tenements. Each tenement will have built up area of 354 ft\textsuperscript{2}. (two rooms + kitchen + living room) with attached toilet and bath. All tenements will also be provided with individual water tank facility of 300 litres and piped water supply. The updated resettlement plan will include a letter from TNSCB indicating willingness to provide the required number of units for households facing relocation.

\textsuperscript{12} Identification of beneficiaries for government housing will be done by District Collector (DC) based on various prescribed criteria. affected persons at SPS-6 site are eligible beneficiaries and will get priority during allotment (http://pmayg.nic.in/netiay/English_Book_Final.pdf).

\textsuperscript{13} This housing is being constructed under centrally/state (60:40) funded scheme of Pradhan Mantri Awaas Yojna (PMAY). The cost of each tenement is approximately 8.3 lakhs. The beneficiary contribution of roughly ₹80,000 required to be paid under the scheme will be borne by the ULB.
50. In addition to the housing, all the permanently affected persons will receive additional benefits in accordance with the TNUFIP resettlement framework (Table 4). In summary, they will be provided with:

(i) **Loss of House**: (i) Compensation as per replacement cost for the structure without depreciation; (ii) Alternative house with minimum area as per Government norms, to which titles will be granted to the affected persons, five years after relocation. The cost of alternative housing to be provided can be set off against all or part of the compensation payable for the structure lost; (iii) One-time Subsistence grant equivalent to 180 days of minimum wages which will be worked out as per the notified minimum wage rates; (iv) One-time financial assistance of ₹10,000/- as transportation cost for shifting of the family, building materials, belongings and cattle; (v) Right to salvage the affected materials.

(ii) **Temporary Loss of Livelihood/ Livelihood Disruption during Relocation**. Subsistence allowance equivalent to notified minimum wages for a period of 3 months.

(iii) **Vulnerability Assistance**. One adult member of the affected household will be entitled for skill development with job placement. Appropriate government programmes will be identified and linked for aged and disable APs, if any. This assistance includes cost of training and financial assistance for travel/conveyance and food; and (ii) additional one-time assistance of ₹5,000. As per current practice of Government of Tamilnadu, the training institute will be responsible for placement of candidates in appropriate jobs. PIU will be responsible for payment to the training institute for the cost of training and for payment of travel/conveyance and food cost to affected persons.

(iv) **Loss of Cattle.** Households with cattle will be provided with additional compensation equal to the cost of the cow (current market price is ₹60,000 for each indigenous milch cow) as they may not able to take the cattle with them in multi-storied apartment unit. This will be provided under unforeseen impacts category.

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14 affected persons facing loss of cattle have indicated willingness to sell their cattle during consultations, as their priority is shelter.
2. Temporary Impacts

51. Potential temporary economic impacts are identified for Vellore UGSS subproject ranging from 20-30 days of construction time for each road stretch of about 500m. In majority of the roads impacts will be avoided as the sewer network will be laid in the middle of the road. In wider and divided roads where work needs to be undertaken on both sides of the road, impacts can be avoided/minimized by taking construction on one side of the road at a time. In such cases temporarily affected persons (affected persons) will be assisted in moving to the other side of the road and returning their temporary structures to the original location after construction is completed. Where moving is not required, access will be ensured by the contractor through measures prescribed in environmental management plan (EMP). During implementation if more number of affected persons are identified at one place (e.g., vegetable market) then an alternate place in the vicinity will also be identified so that they can continue with their livelihood activities.

52. Majority of potentially affected persons have extended their activities on roads or use movable stalls that can be removed/shifted to nearby locations if properly informed. Advance notice regarding construction activities, including duration and type of disruption provided to temporarily affected persons once contractor's work plans are finalized, with minimum 7 working days. If required, they will also be assisted to temporarily shift for continued economic activity. For example, they will be assisted to shift to the other side of the road or nearby areas where
there is no construction. Ensuring there is no income or access loss during sub-project construction is the responsibility of contractors.

53. If construction activities result in unavoidable livelihood disruption, compensation for lost income based on the net income or as per notified minimum wage rates, whichever is higher will be provided. Vulnerable affected persons will be given priority in project construction employment and as per EM. Compensation and assistance to temporarily affected persons will be made prior to displacement and before start of civil works. Since most affected households have moveable stalls, ID cards should be distributed 7 days before compensation. In summary, temporarily affected persons will be provided with:

(i) Advance notice regarding construction activities, including duration and type of disruption provided to temporarily affected persons once contractor’s work plans are finalized, with minimum 7 working days.

(ii) Contractor’s actions to ensure there is no income/access loss consistent with the initial environmental examination. This includes: leaving spaces for access between mounds of soil, providing walkways and metal sheets to maintain access across trenches for people and vehicles where required, increased workforces to finish work in areas with impacts on access, timing of works to reduce disruption during business hours, phased construction schedule and working one segment at a time and one side of the road at a time.

(iii) Assistance to mobile vendors/hawkers to temporarily shift for continued economic activity. For example, assistance to shift to the other side of the road where there is no construction.

(iv) For construction activities involving unavoidable livelihood disruption (temporary income loss), compensation for lost income for the period of disruption.
Table 4: Entitlement Matrix

<table>
<thead>
<tr>
<th>No.</th>
<th>Impact Category</th>
<th>Entitlements</th>
<th>Explanations</th>
</tr>
</thead>
<tbody>
<tr>
<td>II. Impacts to Non-title holders (Squatters, encroachers, tenants, leaseholders)</td>
<td>Loss of House:</td>
<td>1. Compensation as per replacement cost for the structure without depreciation 2. Alternative house with minimum area as per Government norms. The cost of alternative housing to be provided can be set off against all or part of the compensation payable for the structure lost. 3. One-time Subsistence grant equivalent to 180 days of minimum wages which will be worked out as per the notified minimum wage rates. 4. One-time financial assistance of ₹10,000/- as transportation cost for shifting of the family, building materials, belongings and cattle. 5. Right to salvage the affected materials.</td>
<td>Houses in urban areas may, if necessary, be provided in multi-storied building complexes. The Titles for alternatives houses shall be provided in the joint name of the wife and husband.</td>
</tr>
<tr>
<td></td>
<td>Loss of employment in non-agricultural activities or daily agricultural wage and other wage workers</td>
<td>1. Subsistence allowance equivalent to notified minimum wage rates for a period of 3 months</td>
<td>Only agricultural laborers, who are in fulltime / permanent employment of the affected land owner or fulltime employees of the affected business, will be eligible for this assistance.</td>
</tr>
<tr>
<td></td>
<td>Vulnerable* affected persons (permanently affected)</td>
<td>1. Training for skill development. This assistance includes cost of training and financial assistance for travel/conveyance and food. 2. One adult member of the affected household, whose livelihood is affected, will be entitled for skill development. 3. Additional one-time assistance of ₹5000 will be paid to the vulnerable affected persons whose livelihood/ shelter is impacted by the project. 4. Wherever possible, the vulnerable people shall be assisted in enrolling in the applicable government programmes.</td>
<td>Training will be provided through relevant training institutions. Suitable government skill/entrepreneurship development programs will be identified and assistance provided to affected persons to enroll and access the same. Each vulnerable household - with single or multiple vulnerabilities, will receive one-time assistance.</td>
</tr>
</tbody>
</table>

*Any changes required in the Entitlement Matrix pursuant to any Amendments in the LARR 2013 Act and Rules notified by the GOTN will be incorporated with the concurrence of the ADB. All cash allowance in the EM will be revised at the rate of 5% per annum starting from financial year 2019-20.
<table>
<thead>
<tr>
<th>No.</th>
<th>Impact Category</th>
<th>Entitlements</th>
<th>Explanations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>VII. Unforeseen Impacts</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A</td>
<td>Unforeseen Impacts</td>
<td>Unforeseen impacts encountered during implementation will be addressed in accordance with the principles of this resettlement framework.</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td><strong>VIII. Temporary Economic Impacts during implementation</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A</td>
<td>Temporary economic impacts</td>
<td>Compensation for loss of income for the duration of impact based on net income worked out as per IT returns or based on notified minimum wage rates, whichever is higher.</td>
<td>Advance notice provided to temporarily affected persons once contractor’s work plans are finalized, with minimum 7 working days.</td>
</tr>
</tbody>
</table>

*a* Any changes required in the Entitlement Matrix pursuant to any Amendments in the LARR 2013 Act and Rules notified by the GOTN will be incorporated with the concurrence of the ADB. All cash allowance in the EM will be revised at the rate of 5% per annum starting from financial year 2019-20.

*b* Affected non-titleholders on private or government land are included. Tenants and leaseholders in this category are those with informal / verbal arrangements.

*c* Subsistence allowance is not incremental if the impact period for various losses is same. In such case allowance will be provided under any one category, whichever is higher.

*d* Vulnerable affected persons are those living below the poverty line, the elderly (age above 60), persons with disabilities, scheduled castes and scheduled tribes, widows, women headed households and children (orphans, child workers), the landless and those without legal title to land.

*e* Skill training institutes will be contractually bound for job placement as well, as per GOTN’s current practice. Elderly or physically challenged affected persons who are unable to undergo training and/or access job placement, will be assisted to access government social welfare programs.
H. Resettlement Budget and Financing Plan

54. The resettlement budget for Vellore subproject is estimated at ₹16.52 million. The costs are indicative estimates to be confirmed post detailed measurement survey based on detailed design and after allotment of government housing. The cost comprises GRM and consultation costs. Resettlement plan costs will be confirmed during detailed project preparation/implementation.

Table 5: Resettlement Cost

<table>
<thead>
<tr>
<th>Details</th>
<th>Qty.</th>
<th>Unit</th>
<th>Unit Cost (₹)</th>
<th>Total Cost (₹)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1 Permanent loss</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Loss of House</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Concrete roof</td>
<td>2,730</td>
<td>ft²</td>
<td>1192</td>
<td>3,254,160</td>
</tr>
<tr>
<td>• Tiled roof</td>
<td>800</td>
<td>ft²</td>
<td>1083</td>
<td>866,400</td>
</tr>
<tr>
<td>• Thatched roof</td>
<td>2,150</td>
<td>ft²</td>
<td>722</td>
<td>1,552,300</td>
</tr>
<tr>
<td>• Asbestos sheet roof</td>
<td>3,000</td>
<td>ft²</td>
<td>800</td>
<td>2,400,000</td>
</tr>
<tr>
<td>Total Loss of House</td>
<td>8,680</td>
<td>ft²</td>
<td></td>
<td>8,072,860</td>
</tr>
<tr>
<td>New Government Housing (Beneficiary Contribution)</td>
<td>22</td>
<td>Nos.</td>
<td>80,000</td>
<td>1,760,000</td>
</tr>
<tr>
<td>One-time Subsistence Grant for 180 days</td>
<td>3,960</td>
<td>Days</td>
<td>643</td>
<td>2,546,280</td>
</tr>
<tr>
<td>One-time Transportation Allowance</td>
<td>22</td>
<td>Nos.</td>
<td>10,000</td>
<td>220,000</td>
</tr>
<tr>
<td>Additional compensation for vulnerable households</td>
<td>22</td>
<td>Nos.</td>
<td>5,000</td>
<td>110,000</td>
</tr>
<tr>
<td>Skill Training</td>
<td>22</td>
<td>Nos.</td>
<td>30,000</td>
<td>660,000</td>
</tr>
<tr>
<td>Loss of cattle</td>
<td>4</td>
<td>No.</td>
<td>60,000</td>
<td>240,000</td>
</tr>
<tr>
<td><strong>Sub-Total 1</strong></td>
<td></td>
<td></td>
<td></td>
<td>13,609,140</td>
</tr>
<tr>
<td><strong>2 Temporary Income Loss</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provisional sum for compensation of temporary income loss @ minimum wage rate for 44 affected persons for 25 days</td>
<td>1,100</td>
<td>Days</td>
<td>643</td>
<td>707,300</td>
</tr>
<tr>
<td><strong>Sub-Total 2</strong></td>
<td></td>
<td></td>
<td></td>
<td>707,300</td>
</tr>
<tr>
<td><strong>3 Surveys, consultations, grievances and awareness</strong></td>
<td></td>
<td></td>
<td></td>
<td>700,000</td>
</tr>
<tr>
<td>DMS Survey for Resettlement Plan updating</td>
<td></td>
<td>LS</td>
<td></td>
<td>200,000</td>
</tr>
<tr>
<td>Consultation, grievance redress</td>
<td></td>
<td>LS</td>
<td></td>
<td>500,000</td>
</tr>
<tr>
<td><strong>Sub-Total 3</strong></td>
<td></td>
<td></td>
<td></td>
<td>700,000</td>
</tr>
<tr>
<td><strong>Total 1+2+3</strong></td>
<td></td>
<td></td>
<td></td>
<td>15,016,440</td>
</tr>
<tr>
<td>Contingency @ 10%</td>
<td></td>
<td></td>
<td></td>
<td>1,501,644</td>
</tr>
<tr>
<td><strong>Grand Total (₹)</strong></td>
<td></td>
<td></td>
<td></td>
<td>16,518,084</td>
</tr>
</tbody>
</table>

Notes:

a) Beneficiary contribution for new government house will be borne by Vellore Municipal Corporation. Currently it is stated at ₹0.08 million per household. Entitlements against permanent impacts will be estimated separately for each household facing relocation in the Final Resettlement Plan.

b) This cost is indicative. Updated RP will include the actual cost.

c) Minimum wage rate estimated based on:
d) For the purpose of budget preparation in the draft resettlement plan, notified minimum wage rate is used, as per the entitlement matrix. Costs in the updated resettlement plan will be based on a comparison of census and socio-economic survey data on income with the prevailing notified minimum wage rate at the time of compensation payment.

e) Detailed measurement surveys (DMS) will be conducted in sections ready for implementation, based on detailed design to confirm impacts.

f) The allocation for disclosure includes cost of translation of the resettlement plan to Tamil.

15 This cost is indicative. Update resettlement plan will include the actual cost.
16 Minimum wage rate estimated based on:
55. All land acquisition and resettlement costs will be borne by the government/ULB/PIU. Under TNUFIP, it is suggested that payment will be directly made by PIU to affected persons. The CMSC SRSE/GIAC will be involved in facilitating the disbursement process, and will facilitate opening bank accounts for the affected persons (both permanent and temporary loses) who do not have bank accounts.

I. Institutional Arrangements and Implementation Schedule

56. The Municipal Administration and Water Supply Department (MAWS) acting through the Tamil Nadu Urban Infrastructure Financial Services Ltd. (TNUIFSL) will be the state-level executing agency. A program steering committee, headed by Principal Secretary, MAWS, GOTN, will provide overall guidance and strategic directions to the program. A program management unit (PMU) for TNUFIP, headed by the Managing Director (MD), TNUIFSL acting as Program Director will be established within TNUIFSL for overall management, planning, implementing, monitoring, reporting, and coordinating TNUFIP. The Commissioner of Municipal Administration will act as the Deputy Program Director in the PMU. The project urban local bodies (ULBs), represented by respective Municipal Commissioners, will be the implementing agencies (IAs) for works in cities/towns and will establish program implementing units (PIUs) headed by a municipal engineer as full-time Project Manager. For sewerage and water supply works in Chennai, CMWSSB, represented by its Managing Director, will be the IA and establish a PIU headed by a superintending engineer as full-time Project Manager. PIUs will be responsible for overseeing implementation of the various projects on a day-to-day basis. ULBs under the Program with less project implementation capacity, may utilize implementation support from the Tamil Nadu Water and Drainage Board (TWADB) to act as PIU. The Project Managers of the PIUs will be supported by technical, financial, safeguards and administrative staff from a Contract Management and Supervision Consultant (CMSC) recruited by TNUIFSL. For the capacity development and incentivized reforms components, CMA acting through its Commissioner, will be responsible for carrying out these activities and establish a PIU.

57. A program steering committee, headed by Principal Secretary, MAWS, and Members comprises of: (i) Managing Director, TNUIFSL (Convener); (ii) Commissioner of Municipal Administration; (iii) Managing Director, CMWSSB; (iv) Managing Director, TWADB; and (v) Managing Director, TUFIDCO.

58. Project management unit (PMU). The PMU will monitor the Project and have overall responsibility for ensuring adoption and compliance of RF and ADBs SPS. Additionally, PMU will monitor PIUs for: (i) identifying and preparing sub-projects; (ii) reviewing RPs prepared by PIU/ULB; (iii) ensure adoption and compliance of RF in land acquisition and other safeguards; (iv) guide in awareness campaigns and participation programs; (v) organize and operate the program performance monitoring system; (vi) prepare and submit timely reports to ADB; and (vii) design and organize capacity building programs. PMU will be assisted by CMSC in managing and guiding the overall implementation of the Program. Social Project Officer (SPO) of PMU will be responsible for all land acquisition and resettlement matters from PMU side. PMU SPO will perform responsibilities like: (i) addressing social safeguards issues; (ii) implementing the resettlement framework; (iii) report to Projects Head with respect to land acquisition and resettlement plan implementation in the sub-projects; (iv) monitoring physical and financial progress on land acquisition activities and updating the PMU on the same; (v) monitoring
implementation of safeguards plans (resettlement plan); (vi) guiding the PIUs as and when necessary; and (vii) endorsing and submitting periodic monitoring reports.

59. **Project Implementation Unit.** PIUs will be established in each of the participating ULBs within their structure and or at TWADB and in CMWSSB. For Vellore UGSS subproject PIU will be established at ULB supported by CMSC. PIU ASO will implement social safeguards at the PIU level. The PIUs will be responsible for implementation of the resettlement plans. PIUs will undertake internal monitoring and supervision and record observations throughout the project period to ensure that the safeguards and mitigation measures are provided as intended. PIUs will be responsible for: (i) conduct briefing to contractors on safeguards requirements including GRM; (ii) implementing and monitoring safeguards compliance activities, public relations activities, gender mainstreaming activities, and community participation activities; (iii) coordinating with district administration and GIAC for land acquisition and R&R aspects and addressing any problems and/or delays; (iv) monitoring physical and financial progress on land acquisition and R&R activities; (v) organizing monthly meetings with the PIU to review the progress on R&R; and (vi) share all reports relating to land acquisition, alienation, R&R activities etc. and status to PMU. Further details on agencies responsible for resettlement plan activities are in Table 7.

60. **Construction, Management and Supervision Consultants.** The implementing agency will be assisted by a CMSC social and resettlement safeguards expert (CMSC SRSE). The SRSE will (i) based on final designs, carry out census and socioeconomic surveys/verification surveys for the affected people and update resettlement plan in line with the TNUFIP resettlement framework; (ii) identify requirement for any EUPs/NOCs for sub-project sites and assist PIUs in obtaining the same prior to start of civil works. Prepare any additional safeguard documentation, if required, such as due diligence reports; (iii) assist PIU in day-to-day implementation of resettlement plan activities and ensure contractors comply with conditions of resettlement framework/resettlement plan; (iv) take proactive action to anticipate and avoid delays in implementation, and ensure gender equality and social inclusion during implementation; (v) assist PIU in conducting public consultation and disclosure activities; (vi) assist PIU in preparing periodic social safeguard monitoring reports as per PAM requirements; (vii) under guidance of GIAC, assist PIU in establishing a system and indicators, focusing on gender and vulnerable households, to monitor social safeguards including GRM activities; (viii) support GIAC in conducting training focused on involuntary resettlement safeguards implementation capacity of the PIUs; and (ix) assistance to PIU/PMU in any other social safeguard related tasks.

61. **Governance Improvement and Awareness Consultants.** The scope of service will include, but not be restricted to, implementation, monitoring and reporting of the community awareness and participation plan (CAPP); Gender Action Plan, and monitor and guide resettlement plan implementation and lead involuntary resettlement trainings. Specific tasks related to social safeguards include: (i) monitor and guide PIUs on resettlement plan implementation, with particular reference to significant impacts; (ii) lead involuntary resettlement

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18 The monitoring report will focus on the progress of implementation of the IEE/EIA and EARF, RP/RF and IPP/IPF, issues encountered and measures adopted, follow-up actions required, if any, as well as the status of compliance with subproject selection criteria and relevant loan covenants.

19 If the subproject triggers new LARR, PIU will facilitate land acquisition through DC and will provide all details of land acquisition to CMSC SRSE/PMU. CMSC SRSE will incorporate the same in resettlement plan and check its compliance with resettlement framework/ADB SPS-2009 to make necessary additions (if any). PIU will bear the cost of any deviations in the compensation etc. to comply with resettlement framework/ADB SPS-2009. Government procedures under land acquisition act can run parallel even though under ADB project required surveys/preparation of resettlement plan will be undertaken. ADB project need to wait for the outcomes of government procedures to finalize the compensation and disbursement of payments.
training and capacity building on IR/Indigenous Peoples safeguards to project PIUs and CMA; (iii) guide PIUs to set up grievance redress mechanisms, record keeping and feedback mechanisms; and (iv) guide PIUs in keeping detailed records of progress and establishing monitoring and reporting systems for resettlement.

GIAC will also provide guidance to PIUs on specific requirements for IPP implementation, if SR-3 triggered.

62. To build the institutional capacity for resettlement plan preparation and implementation, following key training activities will be undertaken (Table 6). The cost of trainings for all project cities and staff will be borne by Project’s capacity building program by PMU. The detailed cost and specific modules will be customized for the available skill set after assessing the capabilities of the target participants and the requirements of the project.

<table>
<thead>
<tr>
<th>Description</th>
<th>Target Participants and Venue</th>
</tr>
</thead>
</table>
| 1. Introduction and Sensitization to Social/Involuntary Resettlement/Indigenous Peoples Safeguards (1 day)  
- ADB Safeguards Policy Statement  
- Government of India and Tamil Nadu applicable social safeguard acts  
- Incorporation of social/resettlement components under EMP into the project design and contracts  
- Monitoring, reporting and corrective action planning | All staff and consultants involved in the project  
At PMU, Chennai  
First year of the launch of TNUFIP. |
| 2. Resettlement plan implementation (2 days; 2 times during implementation with interval of 1 year in-between)  
- Roles and responsibilities  
- Resettlement plan components and stages in implementation  
- Construction schedules and timelines  
- Public relations  
- Consultations  
- Grievance redress  
- Monitoring and corrective action planning  
- Reporting and disclosure  
- Timely documentation | All staff and consultants involved in the subproject  
All contractors prior to award of contract  
At each PIU |
| 3. Experiences and best practices sharing (1 day)  
- Experiences on resettlement plan implementation  
- Issues and challenges  
- Best practices followed | All staff and consultants involved in the project  
All contractors  
All consultants  
At PMU Chennai |

ADB = Asian Development Bank, NGO = nongovernment organizations, PIU = project implementation unit, PMU = project management unit, TNUFIP = Tamil Nadu Urban Flagship Investment Program
### Table 7: Institutional Roles and Responsibilities

<table>
<thead>
<tr>
<th>Activity</th>
<th>Responsible Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sub-project Initiation Stage</strong></td>
<td></td>
</tr>
<tr>
<td>Finalization of sites for subprojects</td>
<td>PIU</td>
</tr>
<tr>
<td>Disclosure of proposed land acquisition and sub-project details by issuing Public Notice</td>
<td>PIU</td>
</tr>
<tr>
<td>Meetings at community/household level with APs</td>
<td>PIU/CMSC</td>
</tr>
<tr>
<td><strong>RP Preparation and Updating Stage</strong></td>
<td></td>
</tr>
<tr>
<td>Conducting Census of all APs</td>
<td>PIU/ULB</td>
</tr>
<tr>
<td>Conducting FGDs/meetings/workshops</td>
<td>PIU/ULB</td>
</tr>
<tr>
<td>Computation of replacement values of land/properties proposed for acquisition and for associated assets</td>
<td>PIU/ULB and as per RFCTLARR 2013 for Land Acquisition</td>
</tr>
<tr>
<td>Categorization of affected persons for finalizing entitlements</td>
<td>PIU/ULB</td>
</tr>
<tr>
<td>Formulating compensation and rehabilitation measures</td>
<td>PIU/ULB</td>
</tr>
<tr>
<td>Conducting discussions/meetings/workshops with APs and other stakeholders</td>
<td>PIU/ULB</td>
</tr>
<tr>
<td>Fixing compensation for land/property with titleholders</td>
<td>As per RFCTLARR 2013 for land acquisition</td>
</tr>
<tr>
<td>Finalizing entitlements and rehabilitation packages</td>
<td>PIU/ULB</td>
</tr>
<tr>
<td>Disclosure of resettlement plan</td>
<td>PIU</td>
</tr>
<tr>
<td>Approval of resettlement plan</td>
<td>PMU/ ADB</td>
</tr>
<tr>
<td>Sale deed execution and payment</td>
<td>PIU/ULB</td>
</tr>
<tr>
<td>Taking possession of land</td>
<td>PIU/ULB</td>
</tr>
<tr>
<td><strong>Resettlement Plan Implementation Stage</strong></td>
<td></td>
</tr>
<tr>
<td>Implementation of proposed rehabilitation measures</td>
<td>PIU/ CMSC</td>
</tr>
<tr>
<td>Consultations with APs during rehabilitation activities</td>
<td>PIU/ CMSC</td>
</tr>
<tr>
<td>Grievances redressal</td>
<td>CMSC/ PIU/ GRC/ PMU</td>
</tr>
<tr>
<td>Internal monitoring</td>
<td>PMU / PIU/ULB</td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, CMSC = construction, management, and supervision consultant, CMWSSB = Chennai Metro Water Supply and Sewerage Board, FGD = focus group discussion, GRC = grievance redress committee, PIU = project implementation unit, PMU = project management unit, RFCTLARR = The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013

### 63. Implementation of Resettlement Plan

All proposed subproject utility sites will be secured prior to the contract award and start of civil works. Prior the contract award, for all VMC/government lands, PIU will confirm that there are no legacy issues related to acquisition of the sites (i.e., year in which land was acquired/obtained, whether acquired in anticipation of ADB funding, whether all compensation has been paid and accepted, and whether there are any pending legal/other issues). This could be in the form of self-certification by the owner department/VMC. This will be submitted to ADB through PMU before contract award and start of civil works. The resettlement plan will also be disclosed in English and its Executive Summary in Tamil prior to contract award.
### Table 8: Schedule of Resettlement Implementation

<table>
<thead>
<tr>
<th></th>
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<th></th>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Setting up of PIUs</td>
<td>Q4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Appointment of CMSC</td>
<td>H1</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Appointment of GIAC</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Setting up of project level GRM</td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Awareness generation among affected persons on entitlements, impact avoidance and mitigation measures to be implemented by the contractor</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conduct detailed measurement surveys, census surveys and issuance of ID cards in sections ready for construction</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identify Vulnerable affected persons, if any*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Update information and estimates for permanent losses</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Update draft Due Diligence Report</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Update draft Resettlement Plan to reflect surveys, consultations, design changes, and due diligence results</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consultations and disclosure</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Review and approval of updated Resettlement Plan (PMU and ADB)</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Training/capacity building of PMU and PIU safeguards officers, engineers and other staff, CMSC supervision staff and contractor’s staff</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Payment of compensation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Handover of sites and alignments to contractors</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Relocation of affected persons to new housing</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Start of civil works</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Internal monitoring, including surveys of affected persons on entitlements, satisfaction surveys</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Repair/reconstruction of affected facilities, structures, utilities, if any</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Immediately, in consultation with other departments, as required</td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, GIAC = government improvement and awareness consultant, GRC = grievance redress committee, PIU = project implementation unit, PMU = project management unit, CMSC = construction, management, and supervision consultant.

* The start date of census will be the cut-off date for non-titled affected persons.

** The Resettlement Plan will be updated based on final detailed design and affected person census and surveys.

*** Endorsement and disclosure of final Resettlement Plans consistent with the Resettlement Framework to be undertaken.
J. Monitoring and Reporting

64. Resettlement plan implementation will be closely monitored by the PMU. PIU will prepare monthly progress reports on implementation of resettlement plan and submit to PMU, documenting actual achievements against targets fixed and identifying reasons for shortfalls, if any. These reports will feed into the overall monitoring reports for the TNUFIP which will be generated every quarter for the first year of implementation and bi-annually thereafter. Details to be covered under internal monitoring are elaborated in resettlement framework.
# DETAILS OF PERMANENTLY AFFECTED PERSONS

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Note: Baseline survey of affected persons, on income, education, skill levels, occupation, asset ownership, type of housing and access to amenities such as water, sanitation, electricity, transportation, health, education, markets, work place etc., training needs, individual preferences related to relocation, resettlement assistance or training options if any, and willingness and ability to undergo skill training will be conducted and reported in the updated and final resettlement plan and will serve as the basis for resettlement plan monitoring.
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<tr>
<th>Type of Road</th>
<th>Average Width (m)</th>
<th>Max. Pipe dia (mm)</th>
<th>Max. Width of Actual Excavation (mm)</th>
<th>Method of Excavation</th>
<th>Working Width from One Edge (m)</th>
<th>Length of Single Working Stretch (m)</th>
<th>Method of Traffic Management</th>
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<td>Night time work may be opted for, at busy sections with prior permission, stakeholder consultation and noise control measures.</td>
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<td>350</td>
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<td>Flagmen at both ends. Pedestrian traffic can be allowed during works. Vehicles will be allowed after day’s work by covering the trench with steel plates.</td>
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<td>Tiles</td>
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Notes:
(i) Works will be carried out with due intimation to ULB / PWD and after stakeholder consultations.
(ii) All service providers (electricity, telecom, OFC, cable TV, gas etc.) shall be notified and consulted well in advance to identify bottlenecks and possible solutions.
Appendix 2

(iii) Reinstatement will be carried out in two phases – temporary and final.
(iv) Special festival, business (local bazar) etc. days will be strictly followed and works causing disturbance will not be carried out on those days.
(v) No drainage channel shall be disturbed/stopped during construction works. Any drain affected by construction works shall be set right as early as possible and definitely before onset of monsoon.
(vi) The pedestrian area shall be always kept free from debris / trip hazard.
(vii) Environmental Management Plan (EMP) shall be strictly followed for all works and also dealing with any asbestos cement pipes.
(viii) Land contamination, if encountered, shall be immediately brought to the notice of the PIU/PMU and remedial measures shall be taken as advised. Disposal of contaminated earth shall be as advised by the PIU/PMU experts.
(ix) Night time work, if any, shall be carried out after due authorization with adequate safety and security measures. Acoustic hood shall be used on equipment to reduce noise pollution.
SITE VISITS AND CONSULTATIONS

Site Photos – Vellore

LS-12 at Subramaniya Iyyar Street

LS-10 at Veeraswamy Street

LS-12a at Thideer Nagar OHT

LS-11 at Jeevarathinam Street

LS-8 at Droupadi Amman Street

LS-9 at Pillaiyar Koil Street, Shenbakkam
Site Photos – Vellore

LS-7 at Sathuvachari Kurunji Nagar

SPS 7 at Velapadi

SPS 6 near Kural theatre Shenbakkam

SPS 4 at Vasantham Nagar, Sathuvachari
Appendix 3

Site Photos – Vellore

SPS 3 at Alamelumanga puram

SPS 5 at Sathuvachari along the River

STP at Kigitapparai
Kalinjur Lake overflowing due to heavy rainfall in the region; crossing the street and joining the Pandyan Drain.

Avoided impact to non-notified slum, about 50 households, inbetween Kalinjur and Gopalsamudra lake and along the Pandyan Drain

Diversion channel from Kalinjur lake to Gopalsamudra lake and Gopalsamudra lake on right
Outflow channel of Gopalsamudra lake are currently encroached and used as roads.

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<tr>
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<th>Years in Business at Surveyed Place</th>
<th>Type of Structure</th>
<th>Caste Category</th>
<th>WHH</th>
<th>Monthly Income</th>
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</table>

Note: The DMS survey during detailed design will confirm whether any of the potential impacts identified can be avoided, whether there are any additional temporary impacts and how many will require shifting assistance.

**Focus Group Discussions with Temporarily Affected People by Project Preparatory Technical Assistance Team and VMC Officials**

<table>
<thead>
<tr>
<th>Location</th>
<th>No. of Participants</th>
<th>Topics Discussed*</th>
<th>Issues Raised</th>
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</table>
| Focus Group Discussion (FGD)-1 Bangalore Road (Near Railway Gate) | Total=4 M=2, F=2 | The participants do not have any proper structure and they operate with movable items. They collect (buy) old plastic items and papers’ and sell it. This activity does not require a structure. They have been using this place for about 4 years now. | • Expressed that they should be informed well in advance about the construction work so that they can shift to other location  
• Indicated willingness to shift to other locations. |
| FGD-2 Bangalore Road (Near Fish Market) | Total=6 M=6, F=0 | They operate mobile eateries from which they sell vegetarian and non-vegetarian refreshments. They operate all through the day; however, their business is good during evenings. They are operating from this location for the past six to eight years. | • Expressed that they should be informed well in advance about the construction work as it will affect their business  
• Proper access needs to be provided in case major delay in construction work. |
| FGD-3 Old Bypass Road (in front of R.S. Tyres) | Total=7 M=7, F=0 | All participants of the FGD are involved in Tyre retreading and other related activities. They all have their shop in a privately-owned place; however, they use the pavements/road for their activities. They use the space in front of their shop only during the day time and keep all their materials inside the | • Expressed that they should be informed well in advance about the construction work as it will affect their business  
• Proper access needs to be provided in case major delay in construction work. |
### Location | No. of Participants | Topics Discussed<sup>a</sup> | Issues Raised
--- | --- | --- | ---
shop in the night. All these shops are in operation for more than 25 years. Their business depends on the trucks, which run along with the bypass road and they halt here during the night. | • Expressed willingness to support as the project is beneficial to the entire city. |
FGD-4 Old Bypass Road (in front of Archana Stickers) | Total=5 M=5, F=0 | All participants of the FGD are involved in making stickers (for number plates) for vehicles especially trucks, which come and halt in the night. One of them has been doing business in this location for the past 28 years and others have been here for the last ten years. All of them are in privately owned shops and using the space in front of the shop. | • Expressed that they should be informed well in advance about the construction work as it will affect their business • Proper access needs to be provided in case major delay in construction work. • Expressed willingness to support as the project is beneficial to the entire city. |
FGD-5 Samuel Nagar (East Palar) | Total=15 M=6, F=9 | The participants are the residents who live just after the ‘stretch (Bangalore road and Old bypass road)’, which was surveyed. The ward they live in (Ward no. 59) will be covered under phase II of sewer pipeline connection. The residents would be benefitted from the project. They will have temporary access loss/disruption to their houses, vehicular movement etc. | • Expressed willingness to support however equally worried about the project time period/disruption period • Expressed that road should be restored immediately as soon the work gets over |

<sup>a</sup> PPTA Team and VMC officials informed about: (i) issues related to open defecation, disposal of sewage and wastewater into roadside drains eventually polluting the natural streams and rivers; its health impacts; (ii) need for comprehensive underground drainage system in the city; (iii) area covered by the project; (iv) disturbance in traffic movement and to businesses during construction work; (v) assistance will be provided in continuing affected businesses at different location; (vi) no structure loss; (vi) compensation for lost income, if any.

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**Consultation with Permanently Displaced Persons at SPS-6 Access Road, November 2017**
Appendix 3

Place: Navaneedhamman Koil Street (Behind Vellore Fort), Vellore
Date: 8th November 2017
No. of Participants: 37 (which includes residents of Navaneedhamman Koil Street, Officials from Corporation of Vellore, Ward councilors, Representative from TNUIFSL, ADB Consultant, ADB Survey Team)

Highlights of the Consultation

A. Residential Status

1. The settlement is spread for 500 meters; linear along storm water drain which originates at Chinna Allahpuram and reaches Palar River. All the 22 identified residents from this settlement reside at this location for a long time; ranging from twenty-five to forty-five years. The houses are owned by the people (no legal title) who live in it and there are no tenants or leaseholders identified. However, in some cases, there are multiple families living in same house which needs to be counted separately for allocating new government houses. The people in this settlement (all 22 households) socialize among themselves and they celebrate temple festival of their own. They do not have any relationship with the neighbouring area in terms of participating in social or religious events.

2. Most of the affected persons initially settled in small thatched huts and later raised mud walls. Roofs were made by adding Mangalore tiles when the Government of Tamil Nadu supplied free tiles during 1970s. Since then, over the period, households with their own money made additions to their houses by expanding and using better/durable construction material. None of the households have indicated that they have any debt over the house or any loan outstanding to be attended to.

3. Most of the men in the settlement are daily laborers and they work in the market area which is within a distance of a kilometer. Most of the women in the area also work as daily laborers; some of them go for agricultural activities as laborers and few of them are flower vendors in the nearby market. All working people commute by walk.

4. It was noticed that households are aware of importance of education and most of the children go to school. Government school is located close to settlement. Some of the children/girls are also pursuing higher education such as law, management etc. Few of these stay in college hostel while other commute by public transport.

5. The most convenient aspect about the settlement is school, hospital, work place, market and bus stop which are within a radius of two kilometres. Households expressed that a better living space in more hygienic surroundings than their present one will be welcome.

6. Two households’ own cattle and indicated willingness to sell cattle is required, as their preference is safe shelter.

B. Infrastructure and Health Status

7. The infrastructure in the settlement is very poor. Houses are not pucca with proper structure. None of the households have individual water service connections and hence they get water from a public standpipe located at the start of the road/settlement-500 m away. Few households have wells which they use for other household’s purposes other than drinking. None of the houses is attached with a toilet facility and the entire settlement has resorted to open defecation.
8. Wastewater from the houses is let into adjacent drain. This drain, which runs along the settlement, is completely polluted and according to them it has caused many infections. Most of them especially children fall sick quite often; fever, cold and cough are very commonly seen among them. Significant number of them has respiratory problems. Some of them even mention that they have problem caused by methane emitted from the drain during night time.

9. The water overflows from the drain during rainy season and enters into houses and they all are forced to move to a nearby Church for shelter for some days. All affected persons indicated they live in a very unhealthy and unhygienic conditions and are not happy with it. Educated girls in the community expressed that all households should be convinced to shift to better location. The people complain that insects and reptiles are often seen in their settlement, particularly rat snakes. Government hospital is located close by and there are also many private clinics within reach.

C. Resettlement and Compensation

10. All who have participated in the discussion, without any exception, have expressed their willingness to shift if displacement is unavoidable.

11. The Officials from the Vellore Corporation, TNUIFSL and ADB Consultant explained the details of the proposed housing after displacement and they were as follows:
   (i) Relocation will be in multi-storied (G+3) newly built houses by Tamil Nadu Slum Clearance Board which are located near to their current place of residence (about 2 Km walking distance and 3 Km drive)
   (ii) The new houses will be provided with all basic infrastructure; individual water tank, electricity, toilet facility etc.
   (iii) Size of the house and the floor plan
   (iv) Cost of the house – entire cost will be borne by VMC/under government programme and affected persons will not be asked to contribute towards the same.
   (v) Asset in their name after successfully completing 5 years of stay
   (vi) Monthly maintenance charges they would be expected pay after the initial period of 1 year (roughly ₹250/ month).

12. Having listened to the details and benefits of the proposed relocation affected persons have reiterated that they would move to the new place.

13. Some of them expressed concern about the monthly maintenance charges they would have to pay but officials expressed that affected persons can save their productive time (which was wasted due to flooding etc.) to earn additional income.

14. All the participants said that they would prefer their houses to be allotted in the same apartment block, making it possible to stay together in the new location.

15. Most of them, especially women do not possess any skill, have never undergone any training for skill development and majority are currently not involved in any economic activity at home/elsewhere. A few of them know tailoring but without any formal training.

16. No SHG is functional among the population of this settlement and it is reported that they do not have any access to credit facilities from any sources.
17. Community members are willing to undergo skill training, if given to them after moving to new place. Some male members who attended the consultation wanted to know about the possibility of loan facility to carry out economic activity in the trade that they would trained to do. Some of them have driving licenses and they wanted to know whether they could get some loan to buy an auto rickshaw.

Consultation with Permanently Displaced Persons At SPS-6
Consultation with Permanently Displaced Persons At SPS-6
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<td>கார்பரர்க்காரன்/ ஓம்சுனியால் மூலம்</td>
<td>8973680704</td>
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<tr>
<td>33</td>
<td>152 போக்னளுக்கு வளர்ச்சியில் பட்டியல்</td>
<td>8973680704</td>
<td>பிறந்த பிராந்தியம்</td>
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<td>34</td>
<td>போக்குமன்றா ஓம்சுனியால்</td>
<td>9092578868</td>
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<tr>
<td>35</td>
<td>167 போக்காருடன் பாராட்டுகளின் மூலம்</td>
<td>9087778787</td>
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పార్స్కోన్ సార్లియాని తిమలమైన తొలగించడానికి
పాలనాని ప్రాథమికం

చిత్రం:

కానూను ఉపయోగించడానికి
ప్రాథమికం

<table>
<thead>
<tr>
<th>ఎం.డి.కోడు</th>
<th>పేరు మరియు పంచాయత చేరుకుని</th>
<th>ఎంధ్యున్నత సంఖ్య</th>
<th>ప్రత్యేకమైన అంశం</th>
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<tr>
<td>36</td>
<td>Simpson Cornelius ADB Survey Team</td>
<td>94440 09086</td>
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<tr>
<td>37</td>
<td>N. Aloja ADB Survey Team</td>
<td>38405 91211</td>
<td>ప్రత్యేకమైన అంశం</td>
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## LAND DETAILS

<table>
<thead>
<tr>
<th>Component (SPS)</th>
<th>Location</th>
<th>Ownership</th>
<th>Classification</th>
<th>Available (m²)</th>
<th>Required (m²)</th>
<th>Modules (m²)</th>
<th>Pathways (m²)</th>
<th>Green Belts (m²)</th>
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<tbody>
<tr>
<td>1 SPS3</td>
<td>Alamalumanga puram</td>
<td>Corporation</td>
<td>Revenue Poromboke</td>
<td>2225</td>
<td>226</td>
<td>150.82</td>
<td>59.28</td>
<td>15.9</td>
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<td>2 SPS4</td>
<td>Vasantham Nagar, Sathuvachari</td>
<td>Corporation</td>
<td>Vellore Corporation</td>
<td>4228.18</td>
<td>1034.15</td>
<td>664.96</td>
<td>267.98</td>
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<td>3 SPS5</td>
<td>Solid waste management segregation shed, Sathuvachari</td>
<td>Corporation</td>
<td>Vellore Corporation</td>
<td>5156</td>
<td>1820.8</td>
<td>828.65</td>
<td>674</td>
<td>318.15</td>
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<td>4 SPS6</td>
<td>Near Kural theatre Shenbakkam</td>
<td>Corporation</td>
<td>Revenue Poromboke</td>
<td>1461.92</td>
<td>1461.92</td>
<td>1068.36</td>
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<td>5 SPS7</td>
<td>Inbetween Pillaiyarkoil street &amp; Poonthottam, Velapadi</td>
<td>Corporation</td>
<td>Vellore Corporation</td>
<td>1057.91</td>
<td>593.52</td>
<td>292.19</td>
<td>204.58</td>
<td>96.75</td>
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m² = cubic meter.  
Source: VMC  
Note: This table provides summary translation of the land records.
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<thead>
<tr>
<th>No.</th>
<th>Type</th>
<th>Area</th>
<th>Rate</th>
<th>Value</th>
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<td>6</td>
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<tr>
<td>7</td>
<td></td>
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</tr>
<tr>
<td>No.</td>
<td>Description</td>
<td>Footing</td>
<td>Area</td>
<td>Remarks</td>
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<tr>
<td>-----</td>
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<td>2026</td>
<td>30499</td>
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<td>2027</td>
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<td>503</td>
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<td>2028</td>
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<td>504</td>
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<tr>
<td>2030</td>
<td>30503</td>
<td>40</td>
<td>506</td>
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<tr>
<td>2031</td>
<td>30504</td>
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<tr>
<td>2035</td>
<td>30508</td>
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*SUB-INSPECTOR OF SURVEY*
Vellore City Municipal Corporation
Vellore City (North)
<table>
<thead>
<tr>
<th>Number</th>
<th>Rate Base</th>
<th>Assessment Gross</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**TOWN SURVEY**

**REGISTER**

Item No. 80, 81, 82

Inspection date: ____________

Surveyor: ____________

Registered by: ____________

Veilogo (South)

Inspector of Survey: ____________

[Handwritten notes and signatures]

[Handwritten notes and signatures]
<table>
<thead>
<tr>
<th>Register</th>
<th>Description</th>
<th>Number of Pages</th>
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</thead>
<tbody>
<tr>
<td>Section</td>
<td>Details</td>
<td>Pages</td>
</tr>
<tr>
<td>Page 1</td>
<td>Details</td>
<td>1, 2, 3, 4</td>
</tr>
<tr>
<td>Page 2</td>
<td>Details</td>
<td>5, 6, 7, 8</td>
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<tr>
<td>Page 3</td>
<td>Details</td>
<td>9, 10, 11, 12</td>
</tr>
</tbody>
</table>

Notes:
- Page 1: Details include...
- Page 2: Details include...
- Page 3: Details include...

Sub-Inspector of Survey:
Vellore (copy)
<table>
<thead>
<tr>
<th>Serial No</th>
<th>Name</th>
<th>Address</th>
<th>Area (Acres)</th>
<th>Rateable Value</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>John Doe</td>
<td>123 Main St.</td>
<td>0.5</td>
<td>123.45</td>
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<tr>
<td>2</td>
<td>Jane Smith</td>
<td>456 Oak Ave.</td>
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<td>789.01</td>
</tr>
</tbody>
</table>

Sub Inspector of Survey
VELLORE (SOUTH)
PROPOSED STRUCTURE OF SUBPROJECT INFORMATION DISCLOSURE LEAFLET

Up to 2-3 pages maximum.

<table>
<thead>
<tr>
<th>Sub-project Information</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of the subproject, executing agency/implementing agency and city</td>
<td></td>
</tr>
<tr>
<td>Proposed subproject technical details and project benefits</td>
<td></td>
</tr>
<tr>
<td>Summary of subproject impacts</td>
<td></td>
</tr>
<tr>
<td>Compensation and entitlements</td>
<td></td>
</tr>
<tr>
<td>Resettlement Plan budget</td>
<td></td>
</tr>
<tr>
<td>resettlement plan implementation schedule</td>
<td></td>
</tr>
<tr>
<td>Consultation and disclosure requirements</td>
<td></td>
</tr>
<tr>
<td>Implementation structure and GRM information</td>
<td></td>
</tr>
<tr>
<td>Contact numbers of GIAC, CMSC, PIU, PMU</td>
<td></td>
</tr>
</tbody>
</table>

Attach list of affected persons and Entitlement Matrix to this leaflet.
SAMPLE GRIEVANCE REGISTRATION FORM

(To be available in Tamil and English)

The __________________ PROJECT welcomes complaints, suggestions, queries, and comments regarding project implementation. We encourage persons with grievance to provide their name and contact information to enable us to get in touch with you for clarification and feedback. Should you choose to include your personal details but want that information to remain confidential, please inform us by writing/typing *(CONFIDENTIAL)* above your name. Thank you.

<table>
<thead>
<tr>
<th>Date</th>
<th>Place of registration</th>
<th>Project Town</th>
</tr>
</thead>
</table>

**Contact information/personal details**

<table>
<thead>
<tr>
<th>Name</th>
<th>Gender</th>
<th>* Male</th>
<th>* Female</th>
<th>Age</th>
</tr>
</thead>
<tbody>
<tr>
<td>Home address</td>
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<td></td>
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</tr>
<tr>
<td>Place</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Phone no.</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>E-mail</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Complaint/suggestion/comment/question** Please provide the details (who, what, where, and how) of your grievance below:

If included as attachment/note/letter, please tick here:

**How do you want us to reach you for feedback or update on your comment/grievance?**

FOR OFFICIAL USE ONLY

**Registered by:** (Name of official registering grievance)

**Mode of communication:**
- Note/letter
- E-mail
- Verbal/telephonic

**Reviewed by:** (Names/positions of officials reviewing grievance)

**Action taken:**

**Whether action taken disclosed:**
- Yes
- No

**Means of disclosure:**