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Dear Supdt. Of Gardens, Gardens Department, MCGM

We are writing with reference to MCGM notification PRO/681/ADV/2019-20 published in the Times of India on 3 August 2019. In the referenced notification, it is noted that the MCGM is seeking input from the public at large for the purpose of developing a revised public policy for the maintenance and upkeep of all Open Spaces. I am pleased to provide my recommendations as follows. As per the published notification, I have organized my inputs under the following categories, viz:

## **1. Accessibility**

### **1.1 Connectivity to Open Spaces**

1.1.1. Open spaces must be conveniently reachable on foot or by bicycle, with wide and unobstructed footpaths and safe cycle tracks leading to them (As per guidelines in IRC: 103-2012).

1.1.2. High frequency options to reach Open Spaces by public transport must be made available to reduce private vehicle use. A bicycle sharing system would be a plus.

1.1.3. All Open Spaces must include a well-planned on-street parking management system. This means introducing parking fees for private car owners to avoid misuse of space and ensuring adequate, free and safe bicycle parking facilities.

### **1.2 Signage, Wayfinding and Mapping**

1.2.1. All Open Spaces must have simple, consistent, multilingual and visual identification and directional signage for wayfinding that are easily visible from a distance.

1.2.2. Regulatory signage including rules for using Open Spaces must be minimal, easy to understand and legible in Marathi, Hindi and English.

1.2.3. Informational signage should be available at each Open Space, with easy to understand icons of essential activities and facilities available at the location.

### **1.3 Visual and Physical Accessibility**

1.3.1. Open Spaces must have minimal, visually permeable fencing (no solid walls) or no fencing where possible (e.g Shivaji Park). Open Spaces must be easily identifiable from the surrounding streets.

1.3.2. Open Spaces must have multiple entrances in conjunction with the closest public transportation facilities (for eg. close to a bus stop) for easy accessibility and to encourage usage of different areas of the space.

### **1.4 Differently-abled Accessible**

1.4.1. All Open Spaces must be easily approached, entered and navigable by people with disability.

1.4.2. All Open Spaces must have ramps and slopes for wheelchair users, senior citizens and caregivers of babies and toddlers.

## **1.5 Safety**

1.5.1. Safety of Open Spaces and surrounding areas is enhanced when they are well-used at all times of the day and all through the year. Usage must therefore be encouraged by multi-use and cultural programming (see points 2.3 and 2.4)

1.5.2. Security guards must be present at all times. A training programme is essential for security staff to build their culture and investment in the upkeep of Open Spaces.

1.5.3. Adequate lighting must be provided in Open Spaces for after-dark hours.

1.5.4. All Open Spaces must have adequate basic First Aid kits and equipment and must be easily accessible for Emergency Vehicles.

## **1.6 Seating**

An adequate amount and variety of comfortable seating options must be available in all Open Spaces. For eg. seating in shaded areas, temporary or moveable seating, group or individual seating, etc.

## **1.7 Timings and Maintenance**

1.7.1. Open Spaces should be *open* during daylight hours. Closing hours must be kept to an absolute minimum (for eg. 12 to 5am) and only where absolutely necessary.

1.7.2. Maintenance should be scheduled on a daily basis and must cause as little as possible inconvenience to the public.

## **1.8 Open Spaces App and Website**

A dedicated App and Website must be developed to make all information regarding Open Spaces easily available and accessible to the Public. For eg. finding the closest Open Space near oneself in any given area and how best to get there by public transport, notifications about any maintenance work going on, booking a slot and permission to conduct a free class or workshop in an Open Space, facilities and activities available in the space, submitting a query/complaint about any maintenance issues, etc.

The Website should also clearly display allocated budgets for Open Spaces and how they are being distributed and used.

# **2. Inclusivity**

## **2.1 10-minute Walk Rule**

Every Mumbaikar in every neighbourhood must have access to an Open Space within an 800m radius or a maximum 10 minute walk of their residence. Priority must be given

to developing new urban green spaces in areas of the city where there is currently a lack of such spaces.

## **2.2 Diversity**

2.2.1. All Open Spaces must be accessible to members of all socio-economic backgrounds, abilities, genders and ages.

2.2.2. No fees should be charged to access Open Spaces.

## **2.3 Multi-Use**

2.3.1. Users of Open Spaces must have a range of reasons to be there - recreation, picnics, rest, play, exercise, socialization, entertainment, etc. This ensures extended usage of parks to a range of users making the place attractive, vibrant and safe.

2.3.2. Free and safe Wifi should be considered in specially designated parks to encourage use for study and work.

2.3.3. Food and beverage must be allowed in Open Spaces, with adequate means of wet and dry segregated garbage disposal (more details in point 3.3) Education programmes, workshops and informational signage can be used to encourage “zero-waste picnics” (reusable and biodegradable cutlery, containers, etc).

2.3.4. Well designed cafés, food stalls can be encouraged in designated areas of some Open Spaces to extend usage time and encourage employment and the local economy. Cafe owners and Food Vendors must be adequately trained in sustainable waste management practices and shall ensure that the waste they generate is appropriately segregated, disposed and composted at source before the end of each day. (more details in point 3.3).

## **2.4 Education, Cultural Programming and Volunteerism**

2.4.1. A core team of horticulturists, naturalists, rangers, etc must be employed for the continued study & maintenance of parks and for the education of the public at large.

2.4.2. Regular, non-commercial, non-religious and free cultural programming such as concerts, street plays, workshops and classes should be encouraged in Open Spaces. Care must be taken to ensure programming causes minimal inconvenience to regular Open Space users. Cultural programming adds to the vibrancy and usage of these spaces.

2.4.3. Volunteerism must be encouraged in maintenance and landscaping activities to encourage a sense of stewardship amongst users.

## **2.5 Children Accessible**

2.5.1. All Open Spaces must have a variety of safe play zones for children of different age groups made with a variety of elements including creative structures, water play, sand play, and free play.

2.5.2. Accident prevention and safety is essential through regular maintenance of children's play areas.

## **2.6 User Involvement**

Identify and engage with multi age and background users of Open Spaces to identify the needs of the community through workshops and surveys. Periodic re-evaluation must take place to make sure the space is serving its purpose.

## **3. Sustainability**

### **3.1 Protecting existing green spaces**

3.1.1. All existing Open Spaces marked as Recreation Grounds (RG), Play Grounds (PG), Parks (P) and Gardens (G) in the Development Plan must be given a protected status to prevent encroachment and recategorization for development.

3.1.2. Open spaces such as national parks, rivers, beaches, promenades, wetlands, mangroves, rocky shores and other rock formations should also be included and given protected status.

3.1.3. Similarly, public swimming pools and certain RGs & PGs which are developed with clubs etc. should also be included.

3.1.4. Avoid demarcating traffic islands as playgrounds in the Development Plan – these merely meet aesthetic purposes, and cannot be safely used as playgrounds.

3.1.5. All efforts must be made to further afforestation of Open Spaces.

### **3.2 Public Private Partnership**

3.2.1. It is the duty of the Garden Department of MCGM “to provide recreational facilities to the citizens by developing reserved Open Spaces and maintaining the same.” (as per Sankalan FAQs published on MCGM website 2019) Any private partnerships undertaken for the management and maintenance of Open Spaces must not be allowed to have more than a 40% stake in the space and special care must be taken to preserve the publicness of the space.

3.2.2. The MCGM must retain the power to set and approve policies in Open Spaces in consultation with citizens. Private entities should not be permitted to charge an entry fee nor enforce their own policies nor use Open Spaces for any private commercial purposes.

3.2.3. ALMs and Citizens Association groups partnering in the management or maintaining of Open Spaces must consist of members of all socio-economic backgrounds, abilities, genders and ages to be truly representative of the needs of the whole community using the space.

3.2.4. All groups involved in managing and maintaining Open Spaces must compulsorily conduct periodic workshops, surveys and studies with users to make sure Open Spaces are serving the needs of all stakeholders. (Please see point 2.6)

### **3.3 Water Harvesting and Drinking Water**

3.3.1. All water requirements for Open Spaces must be met by employing a water Harvesting system. This ensures a self-sustaining model of an Open Space, crucial during times of water-shortage.

- 3.3.2. Open Spaces can also be used to harvest the water from neighbouring areas.
- 3.3.3. Free and potable drinking water facilities should be available at all Open Spaces to discourage the use of single-use plastic bottles.

### **3.4 Waste Management and Public Toilets**

- 3.4.1. Garbage disposal facilities with clear segregation signage must be present to ensure that there is no littering in Open Spaces.
- 3.4.2. Composting and mulching facilities must be available on site at all Open Spaces to deal with all organic, garden and dry leaves generated in the space.
- 3.4.4. All Open Spaces must have easily accessible and well-maintained public toilets which use grey water for flushing. At least one toilet must be designated for the use of persons with disabilities.

### **3.5 Flooding & Wetlands**

- 3.5.1. Open Spaces can be used as Emergency areas.
- 3.5.2. Certain Open Green Spaces can be designed to accumulate flooding rather than letting the neighbourhood flood.
- 3.5.3. Increasing and protecting the wetland areas in the city will also help to mitigate flooding issues. They can be designed to capture runoff, improve water quality, and to encourage natural wildlife habitat necessary from an ecological standpoint.

### **3.6 Temporary Open Spaces**

Efforts must be made to make temporary usable Open Spaces by closing certain roads to traffic on fixed days of the week. This is an effective, low-cost and quick way to add usable public Open Space while the city waits to regain spaces that have been temporarily lost to development projects such as Metro construction or for new open space projects to be completed (e.g. Equal Streets and Raahgiri Day)

I strongly feel that if the above inputs are further moulded and holistically incorporated into a new public policy document for Mumbai's open spaces in the 21st Century, the quality of life for all Mumbaikars can be substantially improved.

Thank you for the invitation to share our recommendations, and I look forward to studying the draft policy when it is ready for public inputs.

I would appreciate a brief line acknowledging receipt of this mail.

Best wishes,