



**COMMUNICATION AND WORKS  
DEPARTMENT KHYBER PAKHTUNKHWA**

**KHYBER PAKHTUNKHWA INTEGRATED TOURISM  
DEVELOPMENT (KITE) PROJECT**

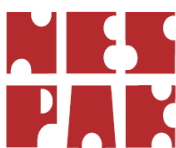


**DUE DILIGENCE REPORT (DDR)**

**BASED ON INITIAL REVISED DESIGN**

**REHABILITATION AND UPGRADATION OF THANDIANI  
ROAD (24.4 KM)**

**SEPTEMBER 2025**



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## Khyber Pakhtunkhwa Integrated Tourism Development (KITE) Project

# DUE DILIGENCE REPORT (DDR)

## TABLE OF CONTENTS

|                                                                                 | <u>Page No.</u> |
|---------------------------------------------------------------------------------|-----------------|
| <b>TABLE OF CONTENTS</b>                                                        | <b>I</b>        |
| <b>LIST OF TABLES</b>                                                           | <b>II</b>       |
| <b>LIST OF FIGURES</b>                                                          | <b>III</b>      |
| <b>LIST OF ABBREVIATIONS</b>                                                    | <b>IV</b>       |
| <b>EXECUTIVE SUMMARY</b>                                                        | <b>1</b>        |
| <b>1 INTRODUCTION</b>                                                           | <b>1-1</b>      |
| 1.1 PROJECT BACKGROUND AND CONTEXT                                              | 1-1             |
| 1.2 OBJECTIVES OF THE PROJECT                                                   | 1-1             |
| 1.3 PROJECT JUSTIFICATION                                                       | 1-1             |
| 1.4 PURPOSE OF DUE DILIGENCE                                                    | 1-2             |
| 1.5 SCOPE AND JUSTIFICATION FOR REALIGNMENT                                     | 1-2             |
| 1.6 METHODOLOGY FOR SOCIAL IMPACT ASSESSMENT                                    | 1-3             |
| <b>2 PROJECT DESCRIPTION</b>                                                    | <b>2-1</b>      |
| 2.1 PROJECT LOCATION                                                            | 2-1             |
| 2.2 PROJECT DESCRIPTION                                                         | 2-1             |
| 2.3 PROJECT ADMINISTRATIVE JURISDICTION                                         | 2-2             |
| 2.4 SUB-PROJECT IMPLEMENTATION SCHEDULE                                         | 2-2             |
| <b>3 REVIEW OF ORIGINAL SAFEGUARD DOCUMENTS</b>                                 | <b>3-1</b>      |
| 3.1 SUMMARY OF PREVIOUS REPORTS                                                 | 3-1             |
| 3.1.1 RESETTLEMENT ACTION PLAN (RAP)                                            | 3-1             |
| 3.1.2 ABBREVIATED RESETTLEMENT ACTION PLAN (ARAP)                               | 3-1             |
| 3.1.3 KEY IMPACTS IDENTIFIED IN THE PREVIOUS ASSESSMENTS AND PREPARATION OF DDR | 3-2             |
| <b>4 RIGHT OF WAY ASSESSMENT</b>                                                | <b>4-1</b>      |
| 4.1 DESCRIPTION AND WIDTH OF RIGHT OF WAY                                       | 4-1             |
| 4.2 VERIFICATION OF ALIGNMENT                                                   | 4-1             |
| <b>5 LEGAL AND POLICY FRAMEWORK</b>                                             | <b>5-1</b>      |
| 5.1 GENERAL                                                                     | 5-1             |
| 5.2 WORLD BANK OP 4.12 ON INVOLUNTARY RESETTLEMENT                              | 5-1             |
| <b>6 STAKEHOLDER CONSULTATIONS</b>                                              | <b>6-1</b>      |
| 6.1 GENERAL                                                                     | 6-1             |
| 6.2 OBJECTIVES                                                                  | 6-1             |
| 6.3 STAKEHOLDER IDENTIFICATION                                                  | 6-2             |
| 6.4 PUBLIC CONSULTATIONS                                                        | 6-3             |



|          |                                                                |            |
|----------|----------------------------------------------------------------|------------|
| 6.5      | LOCATIONS OF THE PUBLIC CONSULTATIONS                          | 6-3        |
| 6.6      | FINDINGS OF PUBLIC CONSULTATIONS                               | 6-4        |
| <b>7</b> | <b>VERIFICATION OF RISK AND IMPACT ASSESSMENT</b>              | <b>7-1</b> |
| 7.1      | GENERAL                                                        | 7-1        |
| 7.2      | LOSS OF LAND                                                   | 7-1        |
| 7.3      | LIVELIHOOD AND INCOME-RELATED RISKS                            | 7-1        |
| 7.4      | POSITIVE IMPACTS                                               | 7-1        |
| <b>8</b> | <b>INSTITUTIONAL FRAMEWORK AND GRM</b>                         | <b>8-3</b> |
| 8.1      | INSTITUTIONAL REQUIREMENT                                      | 8-3        |
| 8.2      | PROJECT STEERING COMMITTEE (PSC)                               | 8-3        |
| 8.3      | PROJECT MANAGEMENT UNIT (PMU), C&W                             | 8-3        |
| 8.4      | PROJECT SUPERVISION AND MANAGEMENT CONSULTANTS (PSMC)          | 8-4        |
| 8.5      | MONITORING AND EVALUATION CONSULTANTS (M&EC)                   | 8-4        |
| 8.6      | ORGANIZATIONAL SETUP                                           | 8-4        |
| 8.7      | GRIEVANCE REDRESS MECHANISM                                    | 8-5        |
| 8.8      | COMPOSITION OF DOT GRC                                         | 8-6        |
| 8.9      | COMPOSITION OF C&W GRC                                         | 8-7        |
| 8.9.1    | <i>Composition of GRC at PMU C&amp;W</i>                       | 8-7        |
| 8.9.2    | <i>Composition of GR Cell at Sub-Project Level/Local Level</i> | 8-7        |
| 8.10     | RESPONSIBILITIES/TERMS OF REFERENCE                            | 8-8        |
| 8.10.1   | <i>Responsibilities/ TORs of PMU GRC</i>                       | 8-8        |
| 8.10.2   | <i>Responsibilities/ TORs of GR Cell</i>                       | 8-8        |
| 8.11     | WORKING AGREEMENTS                                             | 8-8        |
| 8.12     | PROCEDURES FOR FILING THE COMPLAINTS                           | 8-9        |
| 8.13     | TYPE OF GRIEVANCE                                              | 8-11       |
| 8.14     | RECEIPT AND REGISTRATION OF GRIEVANCES                         | 8-11       |
| 8.15     | ACKNOWLEDGING GRIEVANCE:                                       | 8-12       |
| 8.16     | VERIFICATION OF COMPLAINT/INVESTIGATION/REDRESS                | 8-12       |
| 8.17     | DISSEMINATION                                                  | 8-12       |
| 8.18     | RIGHT OF APPEAL                                                | 8-13       |
| 8.19     | GRM MONITORING AND EVALUATION                                  | 8-13       |
| 8.20     | ABSENCE OF LAND ACQUISITION AND RESETTLEMENT IMPACTS           | 8-13       |
| 8.21     | PREPARATION OF DUE DILIGENCE REPORT                            | 8-13       |
| <b>9</b> | <b>CONCLUSION AND RECOMMENDATION</b>                           | <b>9-1</b> |
| 9.1      | CONCLUSION                                                     | 9-1        |
| 9.2      | RECOMMENDATIONS                                                | 9-1        |



## LIST ANNEXES

|         |                                                       |
|---------|-------------------------------------------------------|
| Annex-A | Cadastral Map                                         |
| Annex-B | Design Drawings Showing ROW and Typical Cross Section |
| Annex-C | Photographs from Site Visits                          |



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## LIST OF TABLES

---

|                                        |      |
|----------------------------------------|------|
| Table 2-1: Technical Design Parameters | 2-1  |
| Table 6.1: Locations of Consultations  | 6-3  |
| Table 6.2: Consultation Meetings       | 6-4  |
| Table 8-1: Specimen Grievance Register | 8-10 |
| Table 8-2: Monitoring Indicators       | 8-11 |



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## LIST OF FIGURES

---

|                                                                                  |     |
|----------------------------------------------------------------------------------|-----|
| Figure 2.1: Location Map of the Project Area                                     | 2-1 |
| Figure 8.1: Organizational Setup for Implementation of Social Safeguard Document | 8-2 |
| Figure 8.2: Flow Chart of the Proposed Grievance Redress Mechanism               | 8-4 |



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## LIST OF ABBREVIATIONS

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|      |                                                |
|------|------------------------------------------------|
| ACS  | Additional Chief Secretary                     |
| AH   | Affected Household                             |
| ARAP | Abbreviated Resettlement Action Plan           |
| GRM  | Grievance Redress Mechanism                    |
| GRC  | Grievance Redress Committee                    |
| IP   | Indigenous People                              |
| IR   | Involuntary Resettlement                       |
| Km   | Kilometers                                     |
| KP   | Khyber Pakhtunkhwa                             |
| LA   | Land Acquisition                               |
| LAR  | Land Acquisition and Resettlement              |
| M&E  | Monitoring and Evaluation                      |
| OP   | Operational Policy                             |
| PAPs | Project Affected Persons                       |
| PAPC | Project Affected Person Committee              |
| PD   | Project Director                               |
| PDWP | Provincial Development Working Party           |
| PMU  | Project Management Unit                        |
| PSMC | Project Supervision and Management Consultants |
| R&R  | Resettlement and Rehabilitation                |
| ROW  | Right of Way                                   |
| RU   | Resettlement Unit                              |
| SIA  | Social Impact Assessment                       |
| Sft  | Square Feet                                    |
| TOR  | Terms of Reference                             |
| VHs  | Vulnerable Households                          |
| WB   | World Bank                                     |



## **EXECUTIVE SUMMARY**

### **Chapter 1 – Introduction**

Thandiani is known for its scenic beauty, pleasant climate, and tourism potential, yet poor road conditions limit accessibility. The project's objectives are to enhance mobility, improve safety, and foster tourism-led growth in Abbottabad District. The due diligence exercise was conducted to validate whether the revised initial design would not require the need for any land acquisition and resettlement requirements.

This Due Diligence Report (DDR) has been prepared to document the screening process for land acquisition and resettlement-related impacts of the sub-project. The primary objective of this due diligence exercise was to verify and document the actual social impacts of the sub-project in light of subsequent design revisions. Earlier assessments such as the Resettlement Action Plan (RAP) and Abbreviated Resettlement Action Plan (ARAP) were based on detailed designs required that initially anticipated land acquisition, tree loss, and potential resettlement impacts. However, the project proponent has since decided to avoid any land acquisition by strictly adhering to the available existing Formation Width, which is free from all encumbrances. As a result, no land acquisition and resettlement will be involved in the implementation of the sub-project.

### **Chapter 2 – Project Description**

The project consists of the rehabilitation and upgradation of a 24.4 km road, along with a 700-meter length leading to camping pods. The alignment runs from Thandiani Chowk on Abbottabad-Murree Road to Thandiani Top near the PTV station. The design provides a two-lane road with a 9.5-meter formation width that include proper shoulders, side drains, culverts, slope protection, parapets, and guardrails. The terrain is hilly and challenging, requiring robust engineering solutions. The construction period is estimated as 50 months, with completion targeted by December 2026.

### **Chapter 3 – Review of Original Safeguard Documents**

Earlier social safeguard studies, including a RAP and an ARAP, identified the need for acquiring 2.11 acres of land and impacts on numerous households, as well as on public structures and forest trees. These impacts raised serious concerns during consultations. Responding to community resistance and policy guidance from provincial authorities and considering the recommendations provided in Road Safety Audit (RSA) Report, the project design was revised at certain locations to remain within the existing ROW with minimum formation width of 9.5 m as per recommendations given in the RSA. As a result, all potential displacement and resettlement impacts were avoided, allowing the RAP/ARAP to be replaced by this Due Diligence Report.

### **Chapter 4 – Right of Way (ROW) Assessment**

The road lies within a ROW legally owned by the Communication and Works (C&W) Department, with widths varying between 24 and 44 feet. Although some encroachments exist, these will not be disturbed, and no private land will be acquired. Field verification and cadastral records confirmed that the final alignment remains entirely within government land, ensuring that no household, business, or agricultural land will be affected by the construction.



## **Chapter 5 – Legal and Policy Framework**

The primary objective of the World Bank's Operational Policy 4.12 on Involuntary Resettlement is to prioritize the avoidance and minimization of involuntary resettlement. To ensure compliance with this principle, a due diligence process has been implemented throughout the project design to ascertain social impacts or otherwise. This process includes comprehensive assessments of potential impacts, stakeholder consultations, and the exploration of alternative project designs that mitigate the need for resettlement and to protect the rights and livelihoods of affected communities while improving infrastructure.

## **Chapter 6 – Stakeholder Consultations**

Consultations have been conducted continuously since 2020, involving community members, government officials, and other stakeholders. The most recent consultations in August 2025 engaged participants across different villages along the road. Communities strongly supported the revised design that avoids land acquisition, while raising practical concerns about construction impacts such as dust, noise, temporary access restrictions, and women's mobility. The project team assured participants of mitigation measures, use of local labor, and timely completion. The chapter underscores that the consultation process has been inclusive, transparent, and ongoing.

## **Chapter 7 – Verification of Risk and Impact Assessment**

The social risks and impact assessment confirms that the project will not cause any physical or economic displacement. Instead, the project is expected to bring multiple positive impacts: improved connectivity, reduced travel time, enhanced safety, and greater access to services such as markets, education, and healthcare. The most significant benefit is improved access to Thandiani, which is expected to boost tourism and create employment opportunities in the hospitality and transport sectors.

## **Chapter 8 – Institutional Framework and Grievance Redress Mechanism (GRM)**

Implementation arrangements have been clearly defined. A Project Steering Committee, chaired by the Additional Chief Secretary, has been providing strategic oversight. The Project Management Unit (C&W) is leading construction and safeguard compliance, supported by supervision consultants and independent monitoring and evaluation experts. A structured Grievance Redress Mechanism has been established, comprising local-level grievance cells, PMU-level committees, and an appellate body at the Steering Committee level. Complaints can be submitted through multiple channels, with defined timelines for acknowledgment, review, and resolution, ensuring transparency and accountability.

## **Chapter 9 – Conclusion and Recommendations**

The DDR concludes that the Thandiani Road Sub-project is confined within the Formation Width of the existing ROW and free of any social risks and impacts. The sub-project will deliver substantial benefits by enhancing tourism, creating livelihoods, and improving mobility. There is need to ensure strict adherence to the available Formation Width within the ROW during construction, continuing proactive community engagement, and maintaining an effective grievance mechanism throughout implementation.



# **1 INTRODUCTION**

## **1.1 PROJECT BACKGROUND AND CONTEXT**

Tourism is an important contributor to Khyber Pakhtunkhwa's (KP) economy and job creation, and the number of domestic tourists traveling to KP keeps growing rapidly. KP is blessed with diverse tourism attractions, catering to all interest types. The province has beautiful scenic beauty including mountains, valleys, forests, and rivers. The province has a rich history and is home to ancient civilizations. The province also has rich culture and traditions which attract hundreds of tourists every year for festivals and events. For adventure seekers, the province offers ample opportunities for mountaineering, trekking, skiing, hunting, sport angling etc.

KP's rising value in the tourism sector is also evident from the fact that its expenditure in tourism sector rose from PKR 86.23 million in the financial year 2012-13 to PKR 791 million in financial year 2018-19. The increased tourism promotion has led to an unprecedented rise in tourist traffic in the province, resulting in growth in economic activity in the province and the creation of new employment opportunities for the local population.

The Government of Khyber Pakhtunkhwa (GoKP) has received loan from the World Bank towards the Khyber Pakhtunkhwa Integrated Tourism Project (KITE) and intends to explore sites which have access from main road and can be termed as Integrated Tourism Zone (ITZs).

In this connection, Thandiani top is selected as part of ITZs. The road to Thandiani top off shoots from Thandiani Chowk on Abbottabad-Murree Road and terminates at Thandiani Top near PTV station. The existing road has limited road cross-section as per Civil & Works (C&W) Department Standards, which needs rehabilitation and upgradation.

## **1.2 OBJECTIVES OF THE PROJECT**

The sub-project aims are to improve mobility from Thandiani Chowk on Abbottabad-Murree Road to Thandiani Top fostering tourism. Thandiani is characterized by excellent weather, lush greenery, and snowy landscapes, attracts tourists from KP and across Pakistan, particularly in the summer. Situated at a high altitude, the area offers attractive scenery and several hiking trails in the forests and other nearby locations, making it a highly appealing destination.

## **1.3 PROJECT JUSTIFICATION**

To boost tourism, rehabilitation and upgradation of the sub-project road is an utmost need for improved traffic flow. The enhancement is expected to create more business and



employment opportunities for the local population, contributing to poverty reduction. The sub-project seeks to unlock the under-utilized potential of KP's tourism sector, generating income and revenues. It aims to provide enhanced tourism experience for both domestic and international visitors, prioritizing the preservation of the environment, wildlife, culture, and heritage. The sub-project provides major tangible and intangible benefits which include:

- i) The vehicle operating cost will be at its minimum.
- ii) It will provide an efficient and time-saving route.
- iii) The massive impact of the sub-project will surely help in the progress of the area and local people, as employment and business will be generated in vicinity by the implementation of the sub-project.

#### **1.4 PURPOSE OF DUE DILIGENCE**

This Due Diligence Report (DDR) has been prepared to document the screening process for land acquisition and resettlement-related impacts of the sub-project. The primary objective of this due diligence exercise was to verify and document the actual social impacts of the sub-project in light of subsequent design revisions. Earlier assessments such as the Resettlement Action Plan (RAP) and Abbreviated Resettlement Action Plan (ARAP) were based on detailed designs that initially anticipated land acquisition, tree loss, and potential resettlement impacts. However, the project proponent has since decided to avoid any land acquisition by strictly adhering to the existing available Formation Width. As a result, no land acquisition will be involved in the implementation of the sub-project.

Accordingly, the Due Diligence Report was prepared following a comprehensive field visit and stakeholder consultations to assess the updated alignment, validate that no private land, structures, livelihoods, or vulnerable households would be impacted.

#### **1.5 SCOPE AND JUSTIFICATION FOR REALIGNMENT**

In light of the sub-project's background, the project scope was revised primarily to avoid the social impacts associated with land acquisition. The original technical design included road widening and realignment particularly at one location from Rd 02+000 To 02+850 where S-Curve was to be straightened which would have required acquiring private land. However, during stakeholder consultations and field assessments, it became evident that the affected community was not willing to provide land, primarily due to the small size of individual landholdings. Any acquisition, even minimal, would have had a significant impact on their livelihoods by reducing agricultural and residential space.

Given these concerns and the potential socio-economic disruption, the C&W made a tactical decision to deviate from the original design and limit the intervention to rehabilitation work strictly within the existing alignment and available ROW considering the recommendations provided in Road Safety Audit (RSA) Report. This approach ensures the project's



implementation without triggering land acquisition and resettlement impacts, aligning with both technical feasibility and community preferences.

## 1.6 METHODOLOGY FOR SOCIAL IMPACT ASSESSMENT

The DDR has been prepared in accordance with the World Bank's OP 4.12. To support its preparation, a social impact assessment of the project road alignment was carried out by the project consultant team. To ensure that the revised project scope at few locations does not trigger land acquisition or resettlement impacts, the social safeguards team adopted a structured, step wise methodology, as outlined below:

### I. Review of Project Design and Technical Documentation

The social team of the consultant began by thoroughly reviewing all available design data and project documents, including RSA Report, alignment maps, and land title records. This was done to understand the final alignment and ensure that the construction remained within the existing ROW and RSA Report.

### II. Acquisition and Analysis of Cadastral Map

Updated cadastral map (*Aks Shajra*) was obtained from the relevant Revenue Department through Client which confirmed the existing alignment of the road to cross-check land ownership and confirmed the absence of private land acquisition. This cadastral record was used to overlay the proposed alignment and verify the boundaries. The cadastral map is attached as **Annexure-A** for reference.

### III. Site Observation and ROW Verification

A detailed field survey was also conducted to assess the physical boundaries of the ROW and the construction limits. This step was crucial to document the existing land use, confirm the absence of private structures or informal businesses within the ROW, and assess any potential temporary disruptions. The survey, along with cadastral maps obtained from the relevant Revenue Department, confirmed that the C&W Department owns a 24 To 44-foot-wide (4.4 to 8 Karam) ROW. However, this ROW has been encroached upon to some extent at various locations. Despite these encroachments, the project design will strictly follow the existing available Formation Width for rehabilitation work, ensuring that no new land acquisition will be required. Furthermore, no encroachments will be removed during construction in order to avoid any resettlement or livelihood-related impacts.

### IV. Community Consultations

Focused community consultations were conducted with local residents and stakeholders to assess their concerns and to validate that the revised design would not result in any resettlement or livelihood-related impacts. These consultations also



confirmed that the community was not willing to part with their land due to small landholdings and the potential risk to their livelihoods.

#### **V. Confirmation of No Resettlement Impacts**

Based on the design, field verifications, document review, and community feedback, it was confirmed that there is no land acquisition and resettlement related impacts within the Formation Width. The project will not result any physical or economic displacement of any community members.



## 2 PROJECT DESCRIPTION

### 2.1 PROJECT LOCATION

The sub-project is located in District Abbottabad in KP Province, involved in the upgradation and rehabilitation of the existing Abbottabad ~ Thandiani Road. The sub-project length is 24.4 Km as well as 700 m additional length towards camping pods. The scope of the sub-project is construction of two-lane road from Thandiani Chowk on Abbottabad - Murree Road to Thandiani Top near PTV station as per C&W Department engineering standards. The formation width of the road will be 9.5 meters. The location map of the sub-project area is shown in **Figure 1.1**.

### 2.2 PROJECT DESCRIPTION

The sub-project road starts from Thandiani Chowk on Abbottabad - Murree Road and terminates at Thandiani Top near PTV station. Length of sub-project road is 24.4 Km & 700 m additional length towards camping pods. Presently, the existing road is 5m ~ 7m wide bituminous road, which is not in good condition.

The sub-project involves constructing a two-lane standard road, adhering to C&W Department Standards, from Thandiani Chowk on Abbottabad - Murree Road to Thandiani Top. The sub-project road traverses through multiple population centers, including Nawanshehr, Ghumanwan, Rawalkot, Kalapani and Thandiani spanning challenging hilly/mountainous terrain throughout its alignment. The Sub-project also involves the replacement of existing slab/pipe culverts with new culverts. Details of the sub-project are given below:

#### A. Alignment:

The sub-project alignment starts from Thandiani Chowk on Abbottabad ~ Murree Road and terminates at Thandiani Top. The whole travelled way is rigid pavement with provision of PCC shoulders on both sides and drain towards hill side. The retaining structures along with PCC parapets and guard rails have been provided on the valley side. A Typical Cross Section of the road is shown in **Table 2-1**.

#### B. Technical Parameters:

Details of the technical inputs/parameters, scope and specifications of the sub-project are given below:

**Table 2-1: Technical Design Parameters**

| Standards/ Specifications: Geometrics |  |                                                        |
|---------------------------------------|--|--------------------------------------------------------|
| Total Length of Road                  |  | 24.4 Km & 700 m additional length towards Camping Pods |
| Design Speed                          |  | 25 ~ 40 Kph                                            |



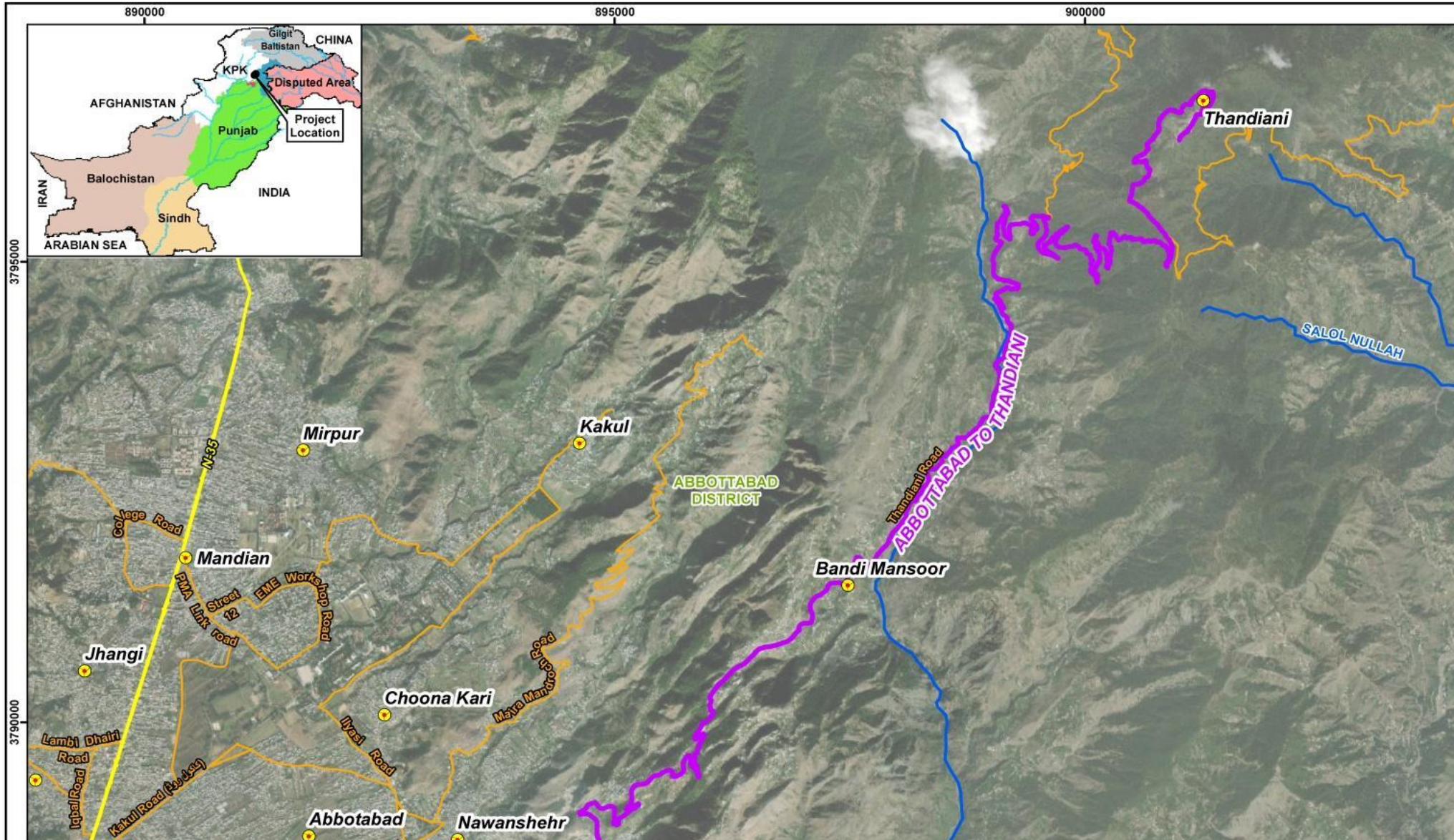
| Standards/ Specifications: Geometrics |                      |                                          |
|---------------------------------------|----------------------|------------------------------------------|
| <b>Road Width</b>                     |                      |                                          |
|                                       | Formation Width      | 9.5 m                                    |
|                                       | Carriageway Width    | 6.5 m                                    |
|                                       | PCC Shoulder Width   | 2.0 m (1.0 m on each side)               |
|                                       | Side Drain           | 1 m PCC Drain towards Hill Side          |
| <b>Crown Slope</b>                    | Pavement             | 2.0%                                     |
|                                       | Shoulder             | 4.0%                                     |
| <b>Embankment</b>                     | Side Slope           | 2H :1V (Common) in Fill                  |
|                                       | Cut Slope            | 1H: 1V in Common Cut                     |
|                                       |                      | 1H: 2V in Soft Rock Cut                  |
|                                       |                      | 1H: 3V in Medium Rock Cut                |
|                                       |                      | 1H: 4V in Hard Rock Cut                  |
| <b>Right of Way (RoW)</b>             | Existing             | Available ROW varies from 24 ft to 44 ft |
|                                       | Total proposed ROW   | As per available ROW                     |
| <b>Maximum Super Elevation</b>        |                      | 6%                                       |
| <b>Gradient:</b>                      | Maximum (Existing)   | 20%                                      |
|                                       | Maximum (Provided)   | Followed Existing                        |
| <b>Design Life of Structure</b>       | Design Return Period | 25 Years                                 |
| <b>Pavement lane Markings</b>         | Yellow Line          | Edge of Pavement                         |
|                                       | White Line           | Centre Line                              |
|                                       | Studs                | As Required                              |

### 2.3 Project Administrative Jurisdiction

The proposed sub-project falls under the jurisdiction of Abbottabad District.

### 2.4 Sub-Project Implementation Schedule

The original construction period for the sub-project was 24 months. As per Revised PC-1, the sub-project is now proposed to be completed by December 2026. The Location Map is shown as Figure 2.1.





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**Figure 2.1: Location Map of the Project Area**



### **3 REVIEW OF ORIGINAL SAFEGUARD DOCUMENTS**

#### **3.1 SUMMARY OF PREVIOUS REPORTS**

The social safeguard documents, including a Resettlement Action Plan (RAP) and Abbreviated Resettlement Action Plan (ARAP), were prepared at different stages of the project in accordance with the scope and scale of anticipated land acquisition and resettlement impacts. These documents were developed to comply with both national laws on land tenure and resettlement, as well as the World Bank's Operational Policy OP 4.12 on Involuntary Resettlement. They provided a framework for mitigating adverse social impacts and ensuring that affected persons were adequately compensated and supported. A brief summary of these documents, along with corresponding impact details, is presented in the following subsections

##### **3.1.1 Resettlement Action Plan (RAP)**

Initially, a Resettlement Action Plan (RAP) was prepared, approved, and disclosed by the Client and the World Bank for the Thandiani Road Upgradation Sub-project, based on a detailed impact assessment conducted in December 2020. However, due to changes in the road alignment from Rd 02+200 To 02+850 and ROW, the social impact assessment and census were updated in April 2023, which was then considered the cut-off date for compensation eligibility. The revised assessment, based on the finalized design, identified minimal land acquisition (2.11 acres) and impacts on 126 households, including 4 landowners, 89 structure owners, and 33 renters, along with 11 community and 4 public structures. Additionally, 748 trees under the Forest Department were supposed to be affected due to ROW clearance for which the compensation had already been provided to the concerned department.

The sub-project screening confirmed that no IP groups were found in the sub-project area; therefore, the World Bank's Indigenous Peoples Policy OP 4.10 was not triggered. No archaeological and historical site was found within the ROW or in the vicinity of the proposed sub-project corridor.

##### **3.1.2 Abbreviated Resettlement Action Plan (ARAP)**

However, keeping in view the resistance from the local community and in order to minimize the overall project impacts, during the Provincial Development Working Party (PDWP) meeting, the Additional Chief Secretary (ACS) Khyber Pakhtunkhwa directed that no encroachments or existing structures be demolished in the built-up areas to avoid involuntary resettlement and protect community interests. In compliance with this directive, the Project Director (PD) instructed the design team to revise the typical road cross-section at certain locations to a variable width ranging from 6.0 to 8.0 meters, adjusted according to site conditions. As a result, construction will proceed strictly within the available ROW, ensuring that no residential, commercial, community, or public structures are impacted. This decision was formally communicated through Letter No.



3242/PMU/NESPAK dated July 25, 2024. Accordingly, the revised design at required locations will not require any need for demolition of structures and avoid all resettlement related impacts except for limited land acquisition in specific segments.

During the social impact assessment and land identification process, it was observed that land acquisition would still be required in certain sections of the road. This included a 850-meter segment from Km 02+000 to Km 02+850 (realigned portion), a 320-meter stretch from Km 05+880 to Km 06+200, and a 200-meter segment from Km 15+320 to Km 15+520. These areas collectively required the acquisition of approximately 2.11 acres of land from four (04) private landholders, including 1.08 acres for the realigned section. The affected land falls under residential and commercial land use categories. The remaining portion between Km 00+000 to Km 16+000 had already been acquired by the C&W Department, while the section from Km 16+000 to Km 24+400 was owned by the Provincial Government (Forest Department and Galiyat Development Authority), both of which issued the required No Objection Certificates (NOCs). Based on the updated design and the ACS's decision to avoid broader resettlement impacts, all other social impacts apart from limited land acquisition were avoided. Consequently, the initially prepared RAP was revised and converted into an ARAP. The updated linear encroachment plan, along with the Project Director's letter, had been included as an appendix to the ARAP, which specifically addressed only the limited land acquisition requirements.

### **3.1.3 Key Impacts Identified in the Previous Assessments and Preparation of DDR**

The earlier RAP and ARAP developed for the sub-project identified several significant social risks, including potential land acquisition and the removal of residential, commercial, community, and public structures. These assessments raised serious concerns about both physical and economic displacement, particularly affecting small business owners and shopkeepers who were vulnerable to income loss and disruption of livelihoods.

The studies concluded that a considerable number of Project Affected Persons (PAPs) would likely experience economic displacement, marking it as a critical issue requiring careful attention. These findings formed the foundation of a responsible due diligence process, which prompted a thorough review and revision of the project's design to minimize adverse social impacts. Consequently, the revised design featuring a Rigid Pavement Road width and alignment limited to the existing Formation Width successfully avoided the need for any structural demolition, physical relocation, land acquisition and loss of livelihoods.

The earlier studies provided a critical baseline for identifying potential socio-economic impacts, particularly related to land acquisition and livelihood disruption. These findings guided the design revision at required locations and served as the basis for preparing the current DDR. The DDR confirms that the finalized project design avoids all adverse social impacts and ensures full compliance with social safeguard policies and community protection standards.



## 4 RIGHT OF WAY ASSESSMENT

### 4.1 DESCRIPTION AND WIDTH OF RIGHT OF WAY

The proposed project alignment is situated within the ROW owned by the C&W Department, which measures 24 to 44 feet in width along the corridor. However, this designated ROW has been encroached upon by the local community at various locations, resulting in a reduced usable width in several segments. Due to these encroachments, the available ROW along the project corridor varies between 24 feet and 44 feet.

In order to avoid any adverse social impacts, the project has been designed to work within the existing available ROW. No land acquisition will be carried out, and there will be no clearance of encroachments that could lead to physical or economic displacement of community members. This approach aligns with the core principles of the World Bank's OP 4.12, ensuring that the project avoid or does not trigger involuntary resettlement or affect the livelihoods of local residents.

The design and engineering plans have been carefully developed to accommodate the varying widths without expanding beyond the currently available ROW sufficient for the Formation Width. A detailed drawing indicating the available ROW at different sections of the alignment is provided as **Annexure-B** for reference.

### 4.2 VERIFICATION OF ALIGNMENT

To ensure that the proposed road alignment remains unencumbered within the legally owned ROW and does not trigger any land acquisition or resettlement impacts, the consultant has undertaken a thorough verification process. As part of this process, the Cadastral Map (*Aks Shajra*), attached as **Annexure A**, was reviewed to identify the exact location, extent, and boundaries of the ROW legally owned by the C&W Department.

A detailed Social Impact Assessment was also conducted to clearly distinguish between the original C&W-owned ROW and the sections of the proposed alignment that had deviated from it and would have required private land acquisition. Based on the findings of the SIA and in alignment with the safeguard requirements of the World Bank's OP 4.12, the project alignment was realigned to strictly follow the original ROW owned by the C&W Department. This decision was made specifically to avoid any land acquisition and to ensure that no physical or economic displacement of the local population would occur.

In addition to reviewing documentary evidence, the consultant team also conducted field verifications and held consultations with local community members and relevant stakeholders. These community consultations further confirmed that the realigned project alignment lies entirely within government-owned land under the jurisdiction of the C&W Department. As such, no private land acquisition is involved in the construction and rehabilitation of the proposed road project.



## **5 LEGAL AND POLICY FRAMEWORK**

### **5.1 GENERAL**

This section provides an overview of the World Bank's Operational Policy OP 4.12 on Involuntary Resettlement. As land is will not be acquired under the revised design, the DDR has been prepared specifically to verify the current status of alignment and confirm that the sub-project remains within the Formation Width free from any encumbrance. As such, the LAA, 1894 is not triggered in this case.

### **5.2 WORLD BANK OP 4.12 ON INVOLUNTARY RESETTLEMENT**

The World Bank's policy on involuntary resettlement (OP 4.12) addresses both physical and economic displacement resulting from land acquisition and restrictions on access to designated parks and protected areas. This policy aims to mitigate adverse impacts on affected communities by providing principles and guidelines to manage involuntary resettlement effectively. It emphasizes that resettlement should be avoided whenever feasible or minimized by exploring alternative project designs. When avoidance is not possible, the policy mandates that resettlement activities be implemented as sustainable development programs, ensuring that displaced individuals can share in the project's benefits. Furthermore, it highlights the importance of meaningful consultation with affected persons, allowing them to participate in planning and implementing resettlement programs.

Due diligence under World Bank Policy is essential to ensure compliance with these guidelines and safeguard the rights of displaced individuals. It involves avoidance and early screening of sub-projects, meaningful consultations, and thorough assessments to identify potential impacts on livelihoods and living standards. The policy aims to provide adequate support to affected persons, helping them improve or restore their livelihoods to pre-displacement levels or better, ensuring that the needs of affected communities are prioritized throughout the project lifecycle.



## 6 STAKEHOLDER CONSULTATIONS

### 6.1 GENERAL

Stakeholders' involvement especially the local population is an important feature of social assessment study and can lead to a better and more acceptable decision-making regarding the project design and its implementation. It gives the feeling of an ownership to the local population.

Consultation is an integral part of IR planning and social safeguard documents preparation and implementation strategy for the project with LAR impacts. Consultation is an on-going process that: (i) begins in the project preparation stage and is carried out on an on-going basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information in manner readily accessible and understandable to affected people and beneficiaries; (iii) enables to document and address the concerns of stakeholders; iv) is undertaken in an atmosphere free of intimidation or coercion and is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues. Consultation is carried out in a manner commensurate with social fabric of the project area and the impacts on affected communities.

To ensure a meaningful consultation process, engagements with PAPs and other stakeholders were initiated from the early stages of the sub-project. Initial consultations were conducted in August 2020 during the preparation of the Environmental and Social Screening Reports. A subsequent round of consultations took place in December 2020 as part of the preparation of the draft Resettlement Action Plan.

Following the finalization of the detailed design, additional consultations were held with local communities and institutional stakeholders, including the Revenue Department, between January and April 2023. Further engagement was carried out in November and December 2024 in response to significant modifications in the project design.

Most recently, another round of public consultations was conducted from August 24 to August 25, 2025, after a strategic decision was made to limit the project design within the available ROW at certain required locations. These sessions were held across the entire project alignment and involved various community members and relevant stakeholders.

In total, 355 participants attended these consultations, actively sharing their concerns and feedback on the project and its implementation. All inputs gathered were systematically documented and incorporated into the stakeholder engagement process and reflected in the safeguard documents. The feedback from the most recent consultations has been recorded to inform the development of a responsive engagement and implementation strategy. A specimen list of participants is provided in **Annexure C**, while photographs from the consultation sessions are included in the **Photolog**.

### 6.2 OBJECTIVES

The objectives of stakeholder consultations were to contribute openness, transparency and dialogue. The concerned stakeholder groups were identified to include in the assessment process.

The objectives of stakeholders' engagement include:

- Informing the stakeholders about the proposed Project;
- Providing an opportunity to those who remained unable to present their views and values, therefore allowing more sensitive consideration of mitigation measures and trade-offs;
- Providing those involved with planning the proposal with an opportunity to ensure that the benefits of the proposal are maximized and that no major impacts have been overlooked;
- Providing an opportunity for the public to influence the project design in a positive manner;
- Increasing public confidence in front of proponent, reviewers and decision makers;
- Providing better transparency and accountability in decision making;
- Reducing conflict through the early identification of contentious issues, and working through these to find acceptable solutions;
- Creating a sense of ownership of the proposal in the minds of the stakeholders; and
- Developing proposals which are truly sustainable.

More intangible benefits flow from the public involvement as the participants realize that their ideas can help to improve the Project. People gain confidence and self-esteem through taking part in the decision-making process and perceptions are expanded by meeting and exchanging views with people who have different values and ideas.

### **6.3 STAKEHOLDER IDENTIFICATION**

The first step in the stakeholder consultation process is the identification and mapping of relevant stakeholders. For the proposed Project, the Communications and Works (C&W) Department, Government of Khyber Pakhtunkhwa (KP), serves as the Project Proponent. In the context of this project, a stakeholder is defined as any individual, group, or organization that may affect, be affected by, or have an interest in the Project.

Stakeholders are broadly categorized into primary and secondary groups. Primary stakeholders are those directly impacted by the Project. These include local community members residing along the project alignment, and relevant government bodies such as the District Administration, Revenue Department, and local development authorities.

Secondary stakeholders are those who have an indirect role or interest in the Project. These may include contractors, consulting firms, non-governmental organizations (NGOs), media representatives, and other public or private entities involved in the planning, implementation, monitoring, or evaluation of the Project.

Stakeholder identification was conducted through field surveys, institutional analysis, and community engagement to ensure inclusive and representative participation throughout the project lifecycle.

## 6.4 PUBLIC CONSULTATIONS

For ascertaining the perceptions of different stakeholders about the project (during/ after construction) meetings were held with local communities and anticipated beneficiaries of the project within the subproject area. These meetings were held in an open atmosphere, in which participants expressed their views freely. Informal group discussions were also held as an additional tool for the assessment of the perceptions of the stakeholders about the project and potential impacts both positive and adverse likely to occur due to its implementation. The views of the local residents and general public were formally recorded and effort was made to make those beneficial for the Project.

## 6.5 LOCATIONS OF THE PUBLIC CONSULTATIONS

The locations of the consultations are provided in the **Table 6.1**.

**Table 6.1: Locations of Consultations**

| Sr. No.                           | Village /Mouza       | Venue                                    | Date       | No. of Participants |
|-----------------------------------|----------------------|------------------------------------------|------------|---------------------|
| 01                                | Kala Pani, Kuthwal   | Kala Pani Bazar                          | 25-08-25   | 13                  |
| 02                                | School Gali, Kuthwal | Main Bazar                               | 25-08-25   | 06                  |
| 03                                | Galli Bania          | Gali Bani Bazar                          | 25-08-25   | 07                  |
| 04                                | Rawlakot             | Main Bazar                               | 25-08-25   | 05                  |
| 05                                | Ghumawan             | Main Bazar                               | 25-08-25   | 07                  |
| 06                                | Ghumawan             | Main Bazar                               | 24-08-25   | 04                  |
| 07                                | Gali Banian          | Gali Banian, Thandiani Road              | 05-11-2024 | 17                  |
| 08                                | Contractor Office    | Contractor's Office                      | 16-12-2024 | 84                  |
| 09                                | Thandiani Chowk      | Bazar Murree Road Start Point of Project | 08-04-23   | 10                  |
| 10                                | Galli Bania          | Gali Bani Bazar                          | 09-04-23   | 12                  |
| 11                                | School Gali, Kuthwal | Main Bazar                               | 11-04-23   | 10                  |
| 12                                | Kala Pani, Kuthwal   | Kala Pani Bazar                          | 12-04-23   | 15                  |
| 13                                | Kund Stop, Chatri    | Main Bazar                               | 13-04-23   | 13                  |
| 14                                | Murree Road          | Bazar Murree Road-Start Point of Project | 09-08-2020 | 08                  |
| 15                                | Kund                 | Kund Bazar                               | 10-08-2020 | 10                  |
| 16                                | Kalay Pani           | Kalay Pani Bazar                         | 10-08-2020 | 12                  |
| 17                                | Gali Bania           | Gali Bania Bazar                         | 10-08-2020 | 10                  |
| 18                                | Thandiani Bazar      | Hotel in the Thandiani Bazar             | 21-12-2020 | 10                  |
| 19                                | Kalay Pani           | Kalay Pani Bazar                         | 22-12-2020 | 25                  |
| 20                                | Kund                 | Hotel in the Kund Bazar                  | 22-12-2020 | 20                  |
| 21                                | Ochar                | Bazar                                    | 22-12-2020 | 05                  |
| 22                                | Crali                | Main Road                                | 23-12-2020 | 07                  |
| 23                                | Ghumawan             | Bazar                                    | 23-12-2020 | 10                  |
| 24                                | Khatwal              | Thandiani Road                           | 23-12-2020 | 08                  |
| 25                                | Chatree              | Thandiani Road                           | 24-12-2020 | 05                  |
| 26                                | Thandiani Top        | Lake View Hotel                          | 24-12-2020 | 04                  |
| <b>Consultations with Females</b> |                      |                                          |            |                     |
| 27                                | Kalay Pani           | Local HH                                 | 22-12-2020 | 10                  |
| 28                                | Kund                 | Local HH                                 | 23-12-2020 | 08                  |

## 6.6 FINDINGS OF PUBLIC CONSULTATIONS

During the consultations, it was assessed that mostly people were aware about the project and its benefits. During discussions, participants have shown keen interest in discussion, gave valuable suggestions and also raised various questions. The local people expressed their willingness and cooperation with the project staff during survey and implementation of the project.

The question raised and response given are provided in **Table 6.2** whereas, pictorial view of the community consultations, data collection and other filed activities is depicted as **Photolog**.

**Table 6.2: Consultation Meetings**

| Sr. No. | Questions/Concerns Raised by Participants                                                                          | Responses of Team Consultant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------|--------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.      | Why was the project design revised, and were community concerns considered in this decision?                       | The design at certain locations was revised after detailed technical assessments and in response to feedback received during earlier consultation sessions. The revised design limits construction activities within the available ROW, avoiding land acquisition and resettlement. This decision was made to minimize social impacts and address concerns raised by the community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2.      | Is there any land acquisition involved due to reconstruction and rehabilitation work of the proposed road project? | It was explained to the participants that the C&W Department made a strategic decision to revise the original design and limit the intervention to reconstruction and rehabilitation activities within the existing alignment and available ROW. In line with this decision, reconstruction and rehabilitation work under the proposed road sub-project will be carried out strictly within the available ROW. As a result, no land acquisition is required, and the project can proceed without triggering any land acquisition or resettlement impacts. This approach not only aligns with technical feasibility but also reflects the preferences of the local communities. By ensuring that all project activities remain within government-owned available land, this decision guarantees that no individuals or households will be displaced or adversely affected. |
| 3.      | Is there any fear regarding loss of income of the local inhabitants?                                               | In response to concerns regarding potential loss of income, it was clarified that no livelihood activities will be affected by the implementation of the project. The design has been carefully revised to ensure that all reconstruction and rehabilitation works are confined within the available ROW. As a result, there will be no impact on local businesses, agricultural land, or any other income-generating activities of the local inhabitants. This approach ensures that community livelihoods remain fully protected throughout the project implementation.                                                                                                                                                                                                                                                                                                 |
| 4.      | Will the revised alignment still meet the original objectives of the project?                                      | Yes, the revised design fully meets the technical and operational objectives of the project, including improved connectivity, road safety, and resilience. The revision ensures a more community-friendly approach while maintaining project effectiveness.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

| Sr. No. | Questions/Concerns Raised by Participants                                                                                                                        | Responses of Team Consultant                                                                                                                                                                          |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.      | Local norms should be honoured and construction work should be completed in time.                                                                                | Construction activities will be completed in the schedule time period. Liaison with the community will be maintained during construction activities.                                                  |
| 6.      | Spoiled/damaged land should be rehabilitated/ restored after the construction work is completed.                                                                 | Contractor will rehabilitate/ restore the lands damaged (if any) by the construction activities.                                                                                                      |
| 7.      | Local skilled and unskilled labour should be employed in the project construction work.                                                                          | Provisions for using local labor are included in the bidding documents, and contractors will give locals preference when assigning jobs.                                                              |
| 8.      | Due to construction activities as well as influx of labor, movement of the citizens particularly of females, residing in the nearby villages will be restricted. | To address this issue, construction work ought to be done during designated times. So that the local residents, especially the female, can walk around the region with ease after construction hours. |
| 9.      | Dust and noise during construction activities will disturb the local community.                                                                                  | During the project's construction period, all necessary precautions should be taken to control the amount of noise and dust.                                                                          |



## 7 VERIFICATION OF RISK AND IMPACT ASSESSMENT

### 7.1 GENERAL

During the impact assessment survey, data on the potential effects of the subprojects were collected. However, field investigations reveal that the subprojects are not expected to cause any significant adverse impacts on local people, land, structures, crops, trees, businesses, or employment. No land acquisition or other livelihood-related impacts were identified during the social impact assessment. On the contrary, the subprojects are expected to bring considerable benefits to the local communities. The rehabilitation works will restore the affected flood protection channels to their original condition. Additionally, the protection works will safeguard agricultural land from inundation, further supporting local livelihoods.

### 7.2 LOSS OF LAND

During earlier phases of the project, concerns were raised about possible land acquisition and displacement due to proposed widening and realignment. However, following stakeholder consultations and technical reviews, the C&W Department strategically revised the project design at certain required locations to remain entirely within the existing available ROW.

As a result, no land acquisition or resettlement is required, and the project will not trigger any displacement of individuals or loss of private property. This has been verified through field assessments, consultation feedback, and engineering design reviews.

### 7.3 LIVELIHOOD AND INCOME-RELATED RISKS

A key concern of the local community involved the potential loss of income and livelihood disruptions due to widening of the road and anticipated land acquisition. However, the revised design ensures that no commercial, agricultural, or income-generating activities will be affected, as all construction will take place within the existing ROW.

Field verification and stakeholder engagement confirmed that local livelihoods will remain intact, and no business structures, farmlands, or vendor setups will be disturbed as part of the project activities. The screening checklist outlining the potential social impacts of the project has been completed and is attached as **Annexure D**.

### 7.4 POSITIVE IMPACTS

The subproject is expected to generate significant positive socio-economic impacts for the local population and the broader region. The reconstruction, rehabilitation, and improvement of the existing road will greatly enhance regional connectivity, reduce travel time, and improve access to essential services such as markets, healthcare, education, and government facilities.



A particularly notable benefit of the project is its potential to boost tourism, as the improved road will provide uninterrupted and safer access to Thandiani, a well-known and scenic tourist destination. Previously, poor road conditions posed significant barriers for tourists, affecting both visitor numbers and the local economy. With enhanced road infrastructure, tourists will now be able to visit Thandiani without hindrance, which is expected to revitalize local tourism, promote small-scale businesses, and increase income-generating opportunities for local residents, including those involved in hospitality, and transport.

Improved road conditions will also enable safer and more reliable transportation, especially critical during emergencies, harsh weather, and seasonal disruptions. In the long term, the project is likely to contribute to sustainable economic growth, employment generation, and an overall improvement in the quality of life for residents of the project area and adjacent communities.

By adopting a community-sensitive and environmentally responsible design, and ensuring that the project remains confined within the available ROW, the subproject avoids negative social impacts while promoting inclusive development.



## **8 INSTITUTIONAL FRAMEWORK AND GRM**

### **8.1 INSTITUTIONAL REQUIREMENT**

The institutional arrangements for the implementation of the sub-project have been aligned with the provisions of the RPF. To ensure the smooth execution of the project, it is essential that all staff involved are well-qualified, and that their roles, responsibilities, and procedures are clearly defined and effectively communicated.

The planning, implementation, and supervision of environmental and social safeguard measures require the coordinated involvement of various institutions. The institutional responsibilities and functional roles of the key stakeholders involved in the implementation of these safeguard instruments are outlined below:

- Project Steering Committee (PSC)
- Project Management Unit (PMU), C&W
- Resettlement Unit (RU)
- Project Supervision and Management Consultants (PSMC)
- Monitoring and Evaluation Consultants

### **8.2 PROJECT STEERING COMMITTEE (PSC)**

Project Steering Committee (PSC) will be constituted for sub-project oversight and strategic guidance. The PSC shall be led by the Additional Chief Secretary (ACS) of KP with representation from P&D Department, Finance Department, Revenue Department, Department of Tourism, Local Government and Rural Development Department, Secretary Communication and Works (C&W) Department, Kaghan Development Authority (KDA), Galiyat Development Authority (GDA) and private stakeholders including representation from the Travel and Tourism Industry, Hazara University, Women Chambers of Commerce, Agha Khan Cultural Services, Bank of Khyber and Small and Medium. Development Authority (SMEDA), KP.

### **8.3 PROJECT MANAGEMENT UNIT (PMU), C&W**

PMU (C&W) will be responsible for construction, engineering, and civil works for the sub-project “Rehabilitation and Upgradation of Thandiani Road Project”. PMU (C&W) should include the following members:

1. Project Director
2. Senior Infrastructure Engineer
3. Road Engineer
4. Senior Environmental Expert
5. Senior Social Safeguard Expert
6. Divisional Accounts Officer (Additional Charge)
7. Procurement Expert
8. Project Accounts Officer
9. Support Staff (Drivers, etc.)

## 10. Additional Staff as and when required

### 8.4 PROJECT SUPERVISION AND MANAGEMENT CONSULTANTS (PSMC)

PMU (C&W) will hire Project Supervision and Management Consultants (PSMC). They will report to PMU (C&W) and prepare the implementation program, quality of works, delivery of works, and certify the quantities of work carried out and the payments. They will also help the PMU (C&W) in sub-project planning and management, procurement planning, contract management, financial management and overall sub-project management.

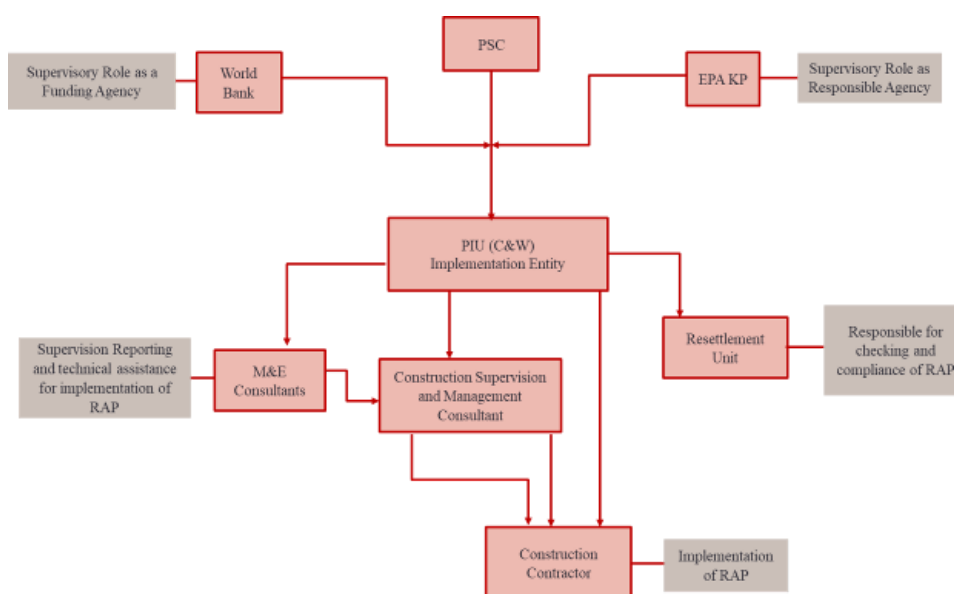
### 8.5 MONITORING AND EVALUATION CONSULTANTS (M&EC)

The regular monitoring of sub-project will be key to successful execution of the sub-project. PMU (C&W) will engage a firm for the external monitoring and evaluation of the sub-project. The firm will have the environment, social, resettlement and gender experts as well. The M&E consultants (Third Party Monitoring Consultants) will be responsible for:

- Monitoring of the physical progress.
- Monitoring and evaluation of the sub-project impact.
- Review and supervision of the environmental and social aspects of the sub-project; and
- Provision of guidance to the management in early identification and resolution of the sub-project.

### 8.6 ORGANIZATIONAL SETUP

The organizational setup for implementation of the resettlement plan is presented in **Figure 8.1** below:

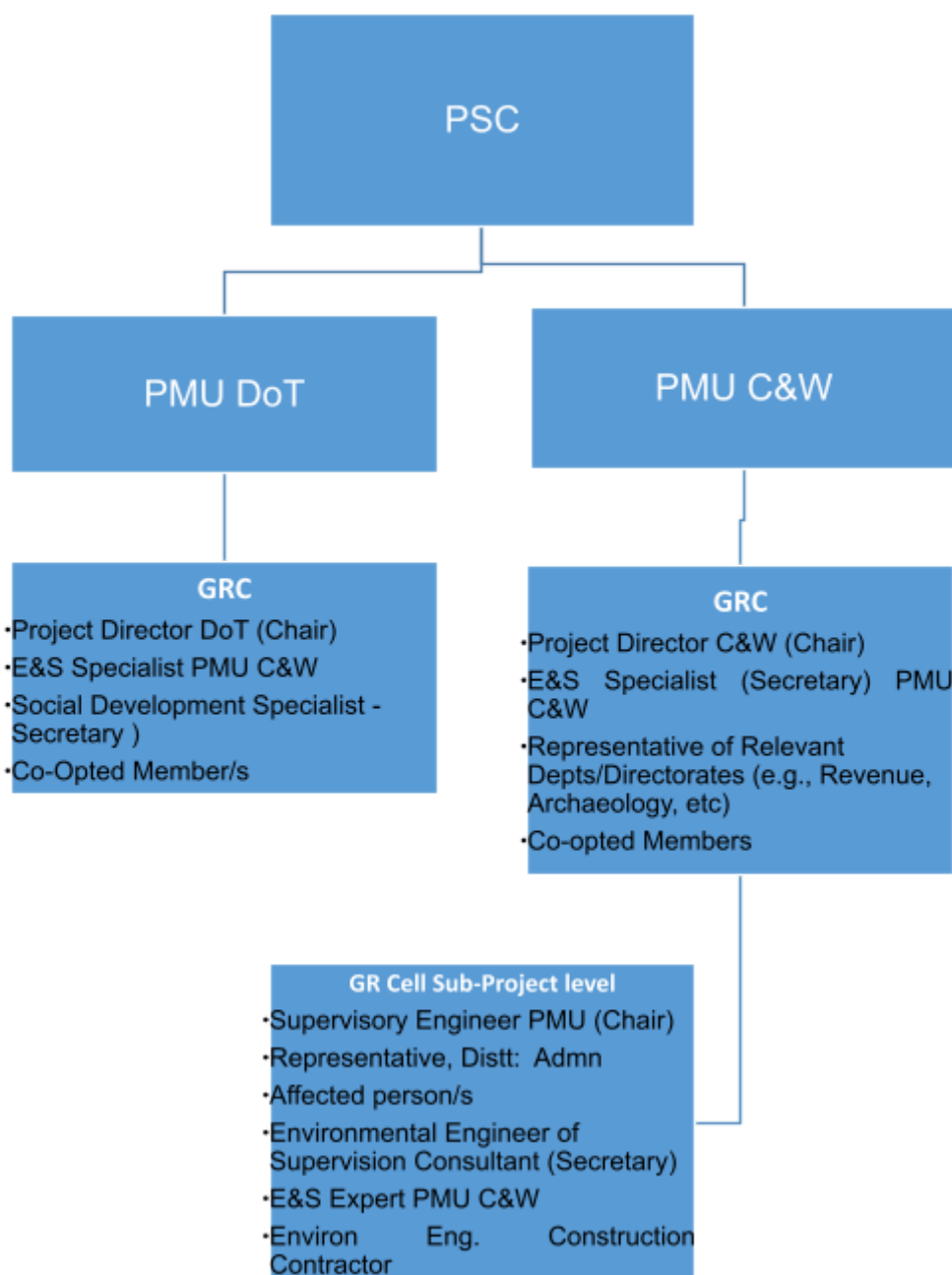




**Figure 8.1: Organizational Setup for Implementation of Social Safeguard Document**

## **8.7 GRIEVANCE REDRESS MECHANISM**

The sub-project GRM will be comprised of (a) Project Steering Committee (PSC), as the highest sub-project level appellate body), (b) Grievance Redress Committees (GRCs) established at the PMU DoT and C&W respectively, and (c) sub-project level Grievance Redressal Cells. The PSC will be headed by the ACS P&DD, the GRCs will be headed by the respective Project Directors of the two PMUs, and the sub-project level GR Cells will be chaired by the Supervisory Engineer of the civil works contractor/s. The Project Environment and Social (E&S) Specialists will be the Secretary to the C&W GRC, whereas the Liaison/Coordination Officer will be Secretary to the DoT GRC. With support from the PDs, the GRC Secretaries will develop an effective grievance handling system and will maintain all records of formal meetings and proceedings. All cases shall be presented to the forum concerned, i.e., the PMU-level GRCs or the sub-project level and site-based GR Cells. The Committee will review and resolve any complaints. Any unresolved complaints can be made to the Project Steering Committee. The flow chart of the proposed Redressal Mechanism is shown below in **Figure – 8.2**.



**Figure 8.2: Flow Chart of the Proposed Grievance Redress Mechanism**

## 8.8 COMPOSITION OF DOT GRC

The PMU DoT has developed a GRM at its PMU level. This GRC is accessible to sub-project PAPs and tourists. PMU DoT will notify the following Grievance Redress Committee (GRC) as per following:

- Project Director PMU DoT Chairman
- E&S Specialist PMU C&W Member
- Liaison & Coordination Officer PMU DoT Member/ Social Development Specialist (SDS- Secretary) Co-Opted Member/s of Relevant Government Departments (e.g.,



- KDA, GDA, Revenue, Archaeology, etc.) (as required) needed to resolve Complaint.
- Invited Members (e.g., Complainant, concerned local citizen) needed to resolve Complaint.

## **8.9 COMPOSITION OF C&W GRC**

The GRC at PMU C&W will be composed of the following two (02) levels and will work directly under the supervision of Project Director PMU C&W.

i. GRC at PMU C&W

**ii.** GR Cell at sub-project level on-site

### **8.9.1 Composition of GRC at PMU C&W**

PMU C&W Grievance Redressal Committee (GRC) shall include the following members:

- Project Director PMU C&W Chairman
- E&S Specialist PMU C&W Member/ Secretary
- Liaison Personnel appointed by PD PMU C&W Member
- Co-opted Member/s of Relevant Government Departments (e.g., KDA, GDA, Revenue, Archaeology, etc.) (if required)
- Invited Members (e.g., Complainant, concerned local citizen) needed to resolve Complaints.

### **6.6.2 Composition of GR Cell at Sub-Project Level/Local Level**

The following *Grievance Redressal Cell (GRC)* will be formed under the PMU C&W at sub-project level:

- Supervisory Engineer PMU C&W Chairman
- Representative of District Administration Member
- Affected Person/s Member
- Environmental Engineer of Supervision Consultant (EE-SC) Member/ Secretary
- Environmental Engineer of Construction Contractor Member
- Co-opted Members (of Relevant Government Departments (e.g., KDA, GDA, Revenue, Archaeology as required).

If no solution can be found at GR Cell level, the PAPs may enter concern/ grievance to the GRC at PMU C&W. For each complaint, the GRC will investigate and prepare the Fact-finding Report and assess its eligibility and identify an appropriate solution. Accordingly, the concerns will be redressed/ appropriately and responded within 14 days. Thus, the GRC will, as appropriate, instruct the responsible entity to take corrective actions. The GRC will review the responsible entity's response and undertake additional monitoring as needed.



## **6.7 RESPONSIBILITIES/TERMS OF REFERENCE**

### **6.7.2 Responsibilities/ TORs of PMU GRC**

The responsibilities of GRC shall include the following:

1. The GRC shall review, consider, and resolve grievances related to environmental and social issues during implementation received at PMU level.
2. Conduct fact-finding pertaining to grievances.
3. Resolve grievances presented to the GRC within a period of one week.
4. Undertake analysis of data on grievances and use this to make informed decisions.
5. Constitute special committees, if required, for redressal of a grievance of an exigent nature and/or for resolutions of complaints requiring additional procedures.
6. GRC decisions, if not acceptable to the Complainant (s), can be appealed to the PSC.
7. Maintain an updated on-line GRM database/Complaints Log.

### **6.7.3 Responsibilities/ TORs of GR Cell**

The responsibilities of GR Cell shall include the following:

1. Review, consider and resolve grievances site level
2. Conduct fact-finding pertaining to grievances
3. Resolve grievances presented within a period of one week
4. Undertake analysis of data on grievances and use this to make informed decisions
5. Maintain an updated on-line GRM database/Complaints Log.

## **6.8 WORKING AGREEMENTS**

The GRC meeting will be held in the PMU or any other location agreed by the Committee. If needed GRC members may undertake field visits to verify and review the issues of dispute.

If the affected person is not satisfied with the decision of GRC at PMU DoT or PMU C&W, then it can be referred to the Project Steering Committee for resolution. If the complainant does not accept these options or if he/she does but an agreement is not reached, the same will be stated in writing, and the case will be closed. The complainant may also seek redress through courts or other mechanisms available.

The PSC will be the highest forum within the sub-project for redressing the grievances received from the beneficiaries, stakeholders and others concerned. Liaison & Coordination Officer PMU DoT and E&S Specialist PMU C&W will be designated as Secretaries to the GRC at their respective PMUs and will act as Focal Person/Complaint Handling Officers for GRC. The GRC, while handling a complaint, may requisition any staff for assistance and/or may constitute a special committee if required. The GRC may also invite other relevant Government Departments or individuals like Co-opted Members or Special Invitees to assist in grievance resolution. The Project Director may replace a single member and/or the entire GRC.



## 6.9 PROCEDURES FOR FILING THE COMPLAINTS

There will be a 5-step process to resolve grievances, as follows:

**Stage 1-Intake:** When a grievance arises, the complainant (affected person/s or stakeholders) may directly contact the PMU through either registering a complaint/s via Complaint Register Book at the PMU offices, Tourist Facilitation Hub, respective sub-project site offices, or through filling the online grievance forms available at website i.e. [www.kptourism.com](http://www.kptourism.com), or by calling the Tourism Helpline **1422**.

**Stage 2- Acknowledgement (05 Days):** The Secretary GRC at the Site level or in the PMU will send acknowledgement of receipt of Complaint within 05 business days to the Complainant and all concerned. Complaints submitted to KITE via the Tourism Helpline 1422 will be resolved by KITE with monthly reporting submitted to the PMU.

**Stage 3-Rapid Review (07 Days):** The GRCs will conduct a rapid review of the complaint and contact relevant stakeholders to facilitate their resolution. If the issue is successfully resolved to the satisfaction of the complainant, it will be noted as “Complaint Resolved”, details of resolution will be recorded in the Complaint Register Book and Online Database/Complaints Log, and no further follow-up will be required, and the complaint will be disposed of as Complaint resolved. If the complainant is not satisfied with the proposed resolution, or if the complaint is complex and requires involvement from other stakeholders, it will be elevated to the next stage. The Rapid Review will take 07 business days (One Week).

**Stage 4-GRC (14 Days):** The Secretary, GRC will convene a Grievance Redress Committee (GRC) meeting comprising relevant stakeholders within the PMU. The GRC will discuss the Complaint in detail, determine action items and next steps, assign responsibilities, and set a timeline for resolution. Minutes of the GRC decision will be shared with the Complainant and relevant stakeholders. The GRC will convene again at the end of the 14-day period to assess progress on its decision. If the Complaint is resolved to the satisfaction of the Complainant and is stated by him/her as such in writing, no further action will be required except to record a summary of the satisfactory resolution in the Grievance Register and Online Grievance Log and inform all relevant stakeholders. All efforts should be made to resolve complaints at the GRC level. However, if the Complaint is not resolved to the satisfaction of the Complainant, s/he can request that it either continue to be handled by the GRC, or that it be elevated for a hearing by the Project Steering Committee.

**Stage 5- Project Steering Committee (21 Days):** The Project Director will convene a meeting of the Project Steering Committee to resolve the Complaint. The Project Steering Committee, chaired by ACS P&DD, will provide high-level oversight and guidance to the PMU on implementation issues. The PSC will invite relevant stakeholders to its meeting and issue directives for the timely and final resolution of the Complaint. The PSC will monitor the implementation of its directives via the PMU, keep the Complainant informed, and take stock of the Complaint in subsequent PSC meeting/s. If the Complaint remains unresolved after 03



PSC meetings, the process will be documented in the Complaints Register and online Case Database/Log, and the Complainant will be informed of the same.

**Legal Remedy:** The Complainant can approach courts and discontinue efforts for resolution via the GRM at any stage in this process.

**Creating Awareness About GRM:** All information about grievance procedures, grievance forms, and responses will be available through brochures/leaflets and online in languages readily understandable by the local population. If there are several languages, then information will be available in all of them and conveyed orally and pictorially. Awareness raising would be conducted in Pushto, Hindko, and Urdu, and in Kalasha language when activities are undertaken in Kalasha Valleys. Pictorial printed material will be used to communicate as many communities will have low literacy levels.

**Transparency & Record-keeping:** The PMU will maintain a record of all complaints received from complaint registers/logbooks/website/Helpline. The details of the complaints will be uploaded quarterly on the C&W and DoT websites i.e., [www.kptourism.com](http://www.kptourism.com) and [www.cwd.gkp.pk](http://www.cwd.gkp.pk) respectively, and the Complainant will be kept informed of all steps and decisions.

**Exclusions:** The following types of complaints shall not be taken up for consideration as grievances:

- i. Frivolous cases for which inadequate supporting details are provided
- ii. Issues not related to the KITE sub-project
- iii. Cases involving decisions/policy matters in which the complainant has not been affected directly/indirectly
- iv. Cases where quasi-judicial procedures are prescribed for deciding matters or cases that are sub-judice
- v. A grievance which has already been disposed of by the GRM unless new evidence is submitted; and
- vi. Complaints about corruption should be lodged and forwarded to the relevant authorities.

There are several ways one can report grievance:

- Contact the concerned Secretary of GRC over the phone on the phone number to be provided.
- Send Grievance Redressal Form via email or online.
- Report a grievance at Tourist Facilitation Hub (TFH) Helpline 1422.

Report grievance at site-level to Site In-charge at Site/Contractor Office by dropping it in Complaint Box or registering it with the Focal Person. All grievances will be assigned a Grievance Number, through which they will be tracked in the KITE GRM system. An acknowledgement of the same will be provided to each Complainant so that s/he can track their complaints. The grievance will be reviewed and will be decided by the GRC Committee. In case the grievance is not connected to the sub-project related activity the grievance will



not be further processed. In these cases, this will be explained in writing to the complainant. A complainant can appeal the decision to the PSC.

In all the other cases the GRC Committee will investigate grievance and identify measures to remedy the situation and propose actions which might be taken to protect against the incident occurring again.

The grievance mechanism will be made through public consultations and information leaflets during implementation.

### **6.10 TYPE OF GRIEVANCE**

The following are some of the social and environmental issues which could be subject to grievance from the affected people, concerned public and NGOs.

- Resettlement and Rehabilitation issues (compensation, allowances, and land related issues)
- Dust, noise and air pollution from construction activities.
- Nuisance
- Inappropriate timing of construction vehicle flow
- Unsafe Traffic Movement
- Water Pollution
- Improper Waste disposal
- Disturbances to flora and fauna
- Health and safety issues
- Privacy concerns
- Labor camp issues
- Failure to comply with standards or legal obligations.

### **6.11 RECEIPT AND REGISTRATION OF GRIEVANCES**

The receipt of complaints is key and hence a simple and understandable procedure is adopted for receiving grievances, suggestions and comments relating to the sub-project as explained in Para 7 above.

The Project will ensure that any person, either in his personal capacity or representing a group of complainants and/or entity that files a grievance will be made aware of the grievance mechanism. To facilitate tracking, evaluation and response to grievances, a standardized form will be used. Complainants are encouraged to use this form that will be available on C&W and DoT websites, and at every office/outlet mentioned above.

*A Project GRM Awareness Campaign* will be launched within a month in print and electronic media. This will include distribution of brochures (in local languages), signboards in the vicinities where sub-project interventions will be executed and in print media. The contents of these hoardings may include but not limited to the following:

- Summary of the GRM procedure and how it can be used.
- Details of the process, such as who is responsible for receiving and responding to the grievances.
- Timeline for receiving responses and results.



- Safeguards in place to ensure confidentiality.

All grievances, suggestions/comments etc. will be recorded in a Grievance Register by the Grievance Redressal Officer, having columns shown in **Table 8-1** within two (2) working days of the receiving of the grievances. A unique number will be assigned to each grievance, suggestions and comments will be lodged in the Grievance Register.

**Table 8-1: Specimen Grievance Register**

| S. No | Date Received | Sub-project/District   | Mode of Submission  | Type of Complaint                                                                                                                             | Proposed actions                                                                                                                        |
|-------|---------------|------------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| 1.    | August 2025   | Thandiani – Abbottabad | Public Consultation | Concern was raised that the proposed project should utilize the existing alignment to avoid land acquisition.                                 | The design was revised in response to this grievance, and construction is being carried out within the existing NHA Right of Way (ROW). |
| 2.    | August 2025   | Thandiani – Abbottabad | Public Consultation | Participants highlighted the need for health and safety measures, including the installation of roadside barricades at the construction site. | The contractor was instructed accordingly, and roadside barricades were installed to minimize accident risks.                           |

#### **6.12 ACKNOWLEDGING GRIEVANCE:**

The Secretary of GRC will formally acknowledge the receipt of grievance within five working days of the submission of grievance and will inform the complainant that the Project will respond within 20 working days. It will be ensured that all such acknowledgements, verbal or written, are recorded in an appropriate manner to ensure record of correspondence. Acknowledgments should include a summary of the grievance and an estimated time for response/resolution.

#### **6.13 VERIFICATION OF COMPLAINT/INVESTIGATION/REDRESS**

Once a complaint and/or suggestion/ comment has been forwarded to the GRC or Sub-Committees, the Chairperson of the Committee will nominate a committee member to verify the issue and/or analyze the suggestion/ comment prior to thorough investigation, and to prepare a working paper for consideration of the Committee/ Sub-Committee in its meeting. The investigations will include collecting and reviewing relevant documents, making site visits, consulting appropriate internal staff, contacting external stakeholders, interviewing the complainant as appropriate.

The Committee and Sub-Committee will meet as often as required to handle complaints and suggestions. The GRC and its Sub-Committee will ensure attendance of complainants at meetings as member/ observers to ensure transparency.



## 6.14 DISSEMINATION

Once the redressal process is completed and the GRC and/or GR Sub-Committee have reached a conclusion, the result will be communicated to the complainant and concerned stakeholders. The results of the redressal process will be uploaded to both C&W and DoT website. Besides communicating the results to the Complainant, the Focal Person(s)/ Complaint Handling Officer will also record the information pertaining to the decisions of the Committee(s) in the grievance register and corresponding grievance database. The actions suggested by the GRC or Sub-Committee will be communicated to the person(s) concerned and will be recorded in a register.

## 6.15 RIGHT OF APPEAL

If a complainant is dissatisfied with and/or unwilling to accept the resolution of the GRC or its Sub- Committees, he/she may approach the PSC as the appellate forum for review. The *Appellate Forum* will review the case and determine if further action is possible. Once all options for corrective actions have been explored and no further action is deemed appropriate, a written notice will be sent to the complainant advising that his/her grievance case is closed.

## 6.16 GRM MONITORING AND EVALUATION

To ensure evaluation and improvement of the GRM, the Project will monitor implementation using the monitoring matrix in **Table 8-2**.

**Table 8-2: Monitoring Indicators**

| Period                                      | Objectives                                                                                                                                                                                                                                                                                       | Indicators                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Quarterly Review of Quantitative Indicators | <ul style="list-style-type: none"><li>• To assess if grievances are correctly screened and classified.</li><li>• To assess if suggestions / comments are properly identified and classified</li><li>Identify trends in grievances.</li><li>• To ensure grievances are being addressed.</li></ul> | <ul style="list-style-type: none"><li>• Number of grievances received by level and type.</li><li>• Number of grievances redressed by level and type.</li><li>• Repeat of grievances from same stakeholder</li><li>• Repeat of grievances from several stakeholders</li><li>• Timeframe for closure of grievances; by level and type</li><li>• Number of comments accepted, and corresponding actions taken.</li><li>• Number of suggestions received and accepted</li></ul> |

## 6.17 ABSENCE OF LAND ACQUISITION AND RESETTLEMENT IMPACTS

Based on the revised design and field-level verification, the reconstruction and rehabilitation activities under the proposed road sub-project will be carried out entirely within the formation width, and no encroachments, informal uses, or third-party claims were identified within the



formation width along the project alignment. Therefore, no private land acquisition will be required, and no displacement of people, structures, or assets will occur. In addition, the project will not affect any businesses, vendors, farmers, or other income-generating activities. As such, no livelihood impacts are expected as a result of project implementation.

#### **6.18 PREPARATION OF DUE DILIGENCE REPORT**

To document the absence of resettlement and livelihood impacts, a Due Diligence Report (DDR) is being prepared for this sub-project. The DDR will serve as the primary safeguard instrument to confirm compliance with World Bank requirements and national regulatory frameworks.



## 7 CONCLUSION AND RECOMMENDATION

### 7.6 CONCLUSION

- The proposed reconstruction and rehabilitation road sub-project have been carefully reviewed through site assessments, design evaluations, and community consultations.
- It has been conclusively determined that all project activities will be confined to the existing available government-owned Formation Width, free of any encumbrance and there will be no need for land acquisition or displacement of people, assets, or structures.
- No informal settlements, encroachments, or livelihood activities were found within the project footprint. Therefore, the project poses no resettlement or livelihood-related risks to the local population.
- In alignment with the World Bank's OP 4.12 on Involuntary Resettlement, the sub-project is classified as one with no resettlement impacts, and as such, no RAP or LRP is required.
- This Due Diligence Report has been prepared as the key safeguard instrument to document these findings and confirm compliance with the applicable safeguard frameworks.

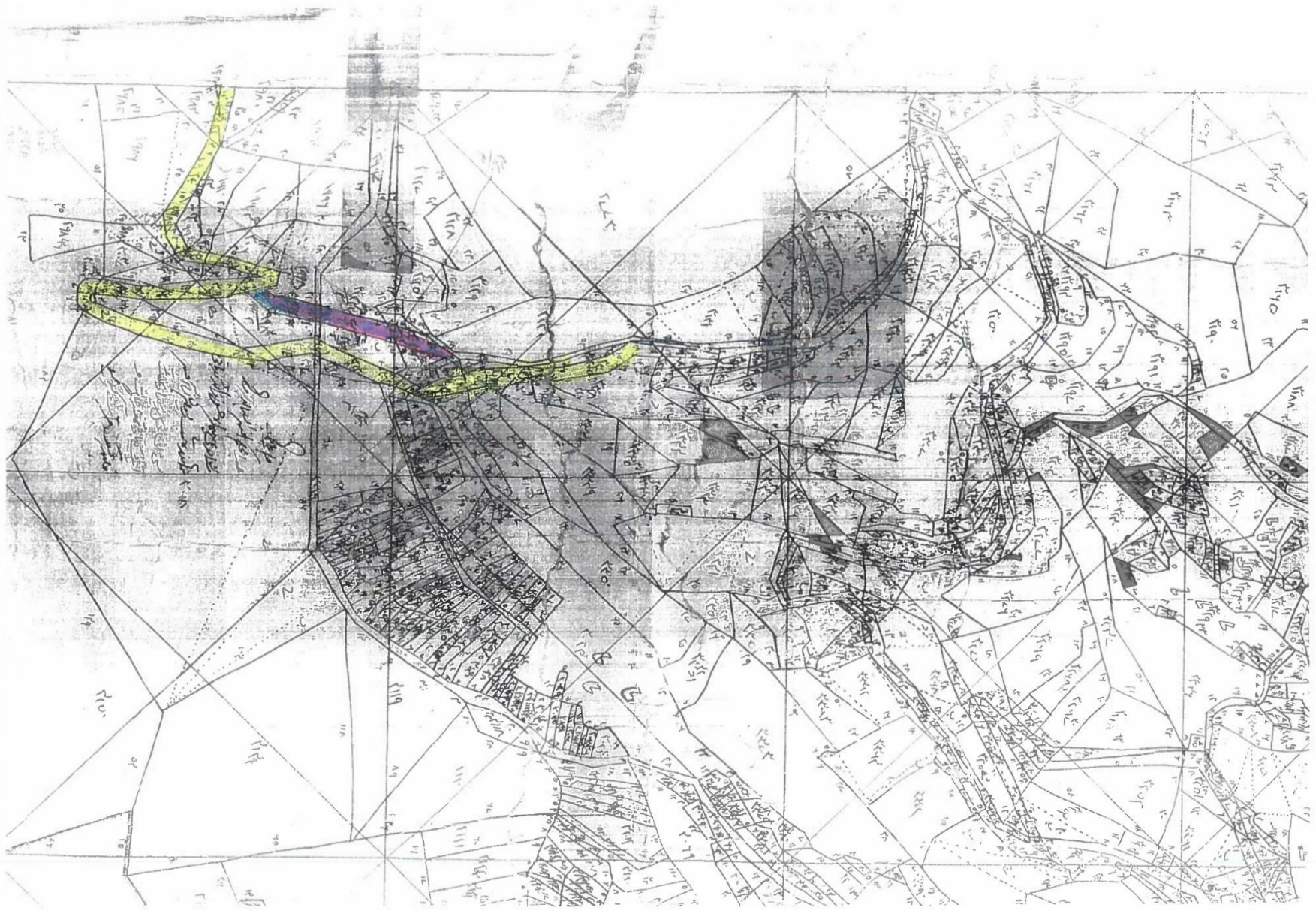
### 7.7 RECOMMENDATIONS

- **No Further Social Safeguard Actions Required:** Since no resettlement or livelihood issues are involved, no additional social safeguard instruments or mitigation measures are necessary.
- **Disclosure of DDR:** The finalized DDR should be properly disclosed to stakeholders and uploaded to relevant project platforms as per World Bank disclosure requirements.
- **Grievance Redress Mechanism (GRM):** The existing GRM should remain functional during project implementation to address any unforeseen concerns raised by local stakeholders.
- **Continued Stakeholder Engagement:** The project team should maintain regular communication with community members and relevant institutions throughout the construction phase to ensure transparency, community satisfaction, and smooth execution.
- **Monitoring and Reporting:** Periodic monitoring should be conducted to confirm that project activities remain within the defined ROW and that no unexpected social impacts occur during implementation.

# **ANNEXES**

# **Annex-A**

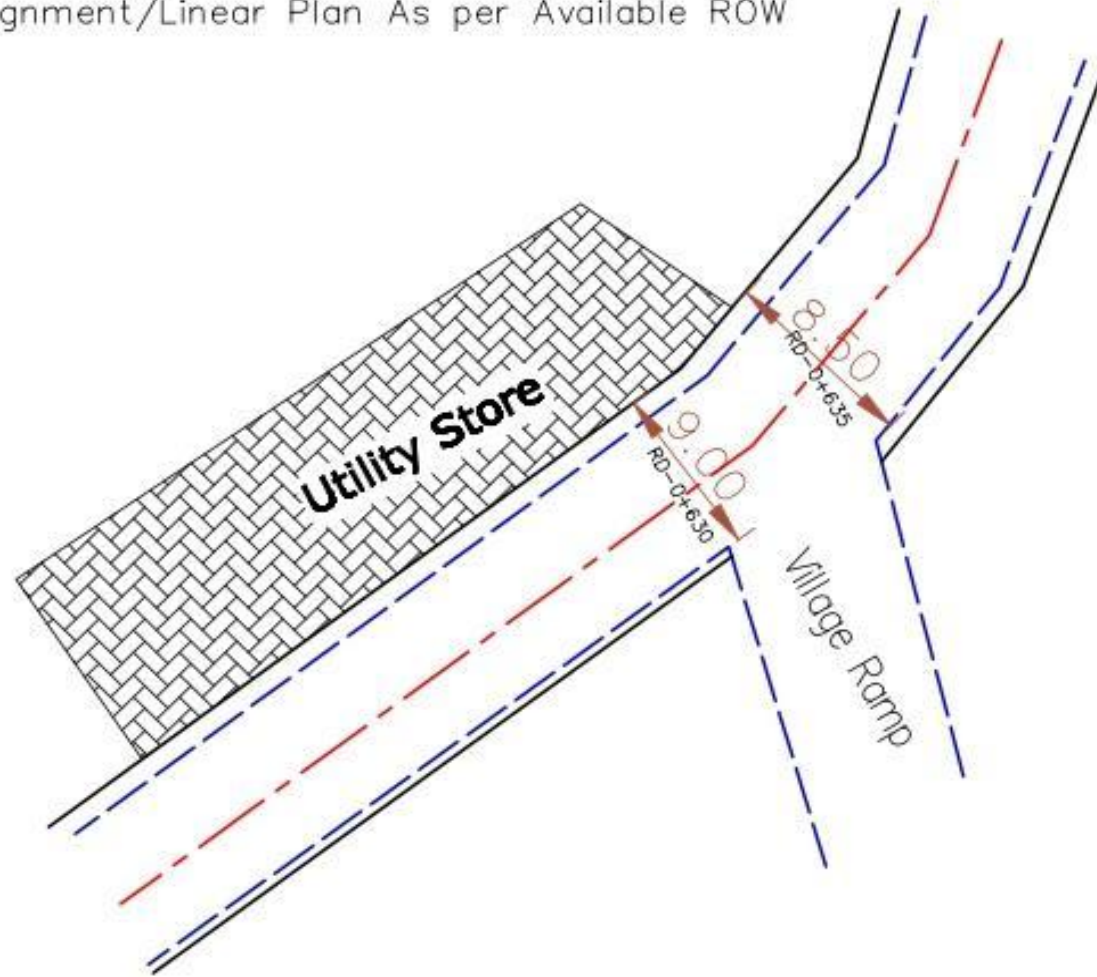
## **CADASTRAL MAP**



## **Annex-B**

**DETAILED DRAWING SHOWING ROW AND CROSS SECTIONS**

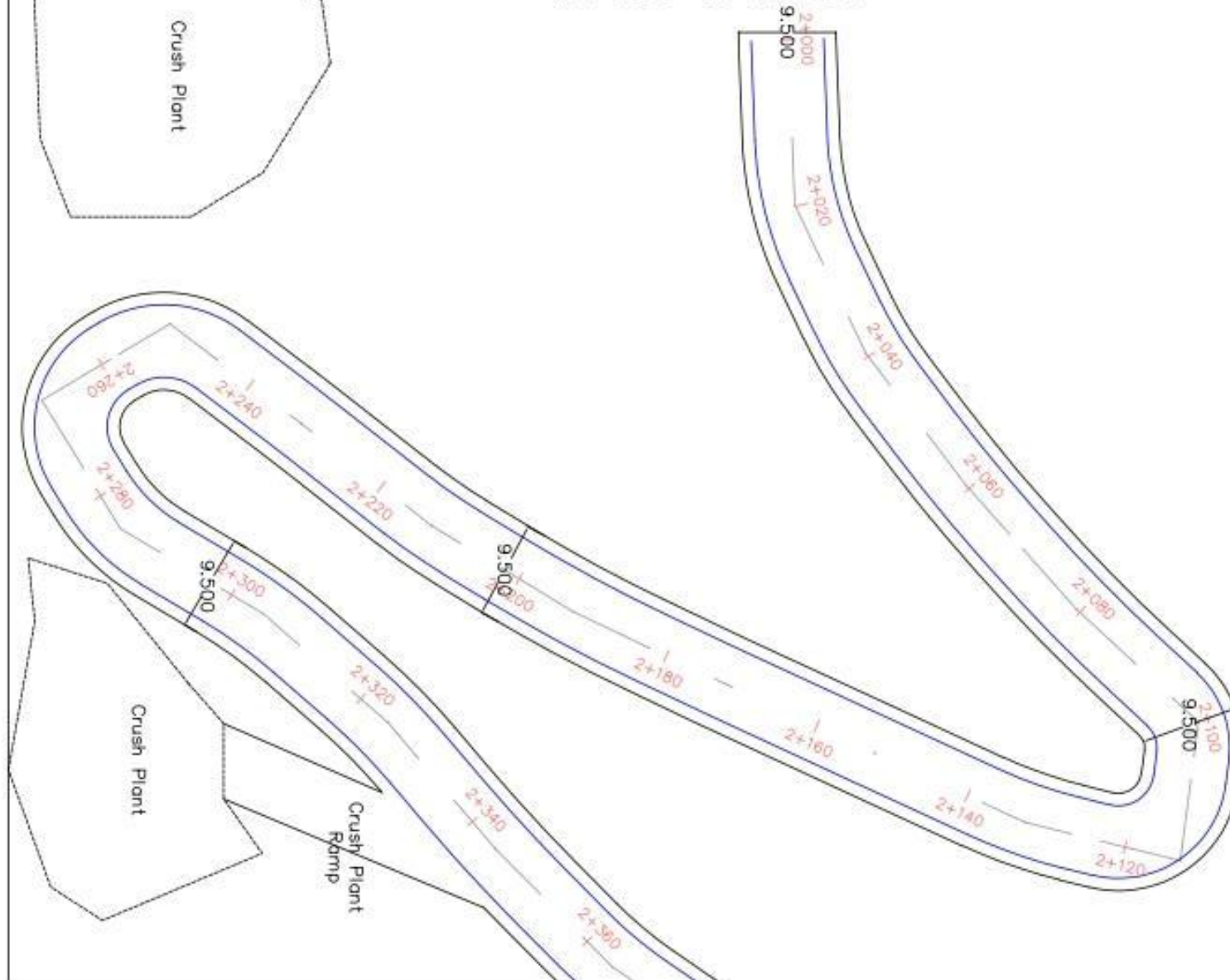
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Alignment/Linear Plan As per Available ROW



Legends:

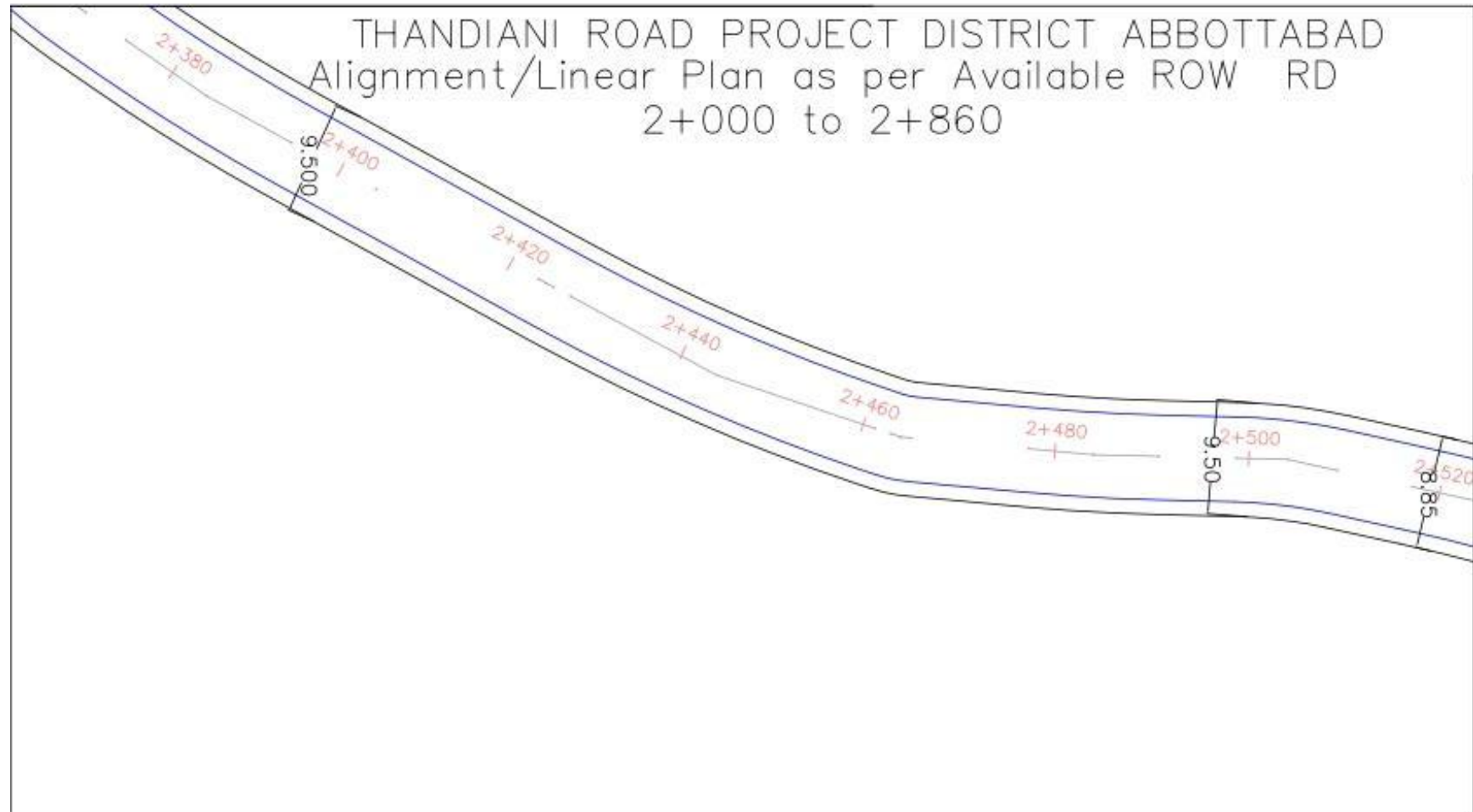
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- C/W Edge ————
- Shoulder Edge ————
- Retaining Wall ————

THANDIANI ROAD PROJECT DISTRICT ABBOTTABAD  
Alignment/Linear Plan as per Available ROW RD  
2+000 to 2+860

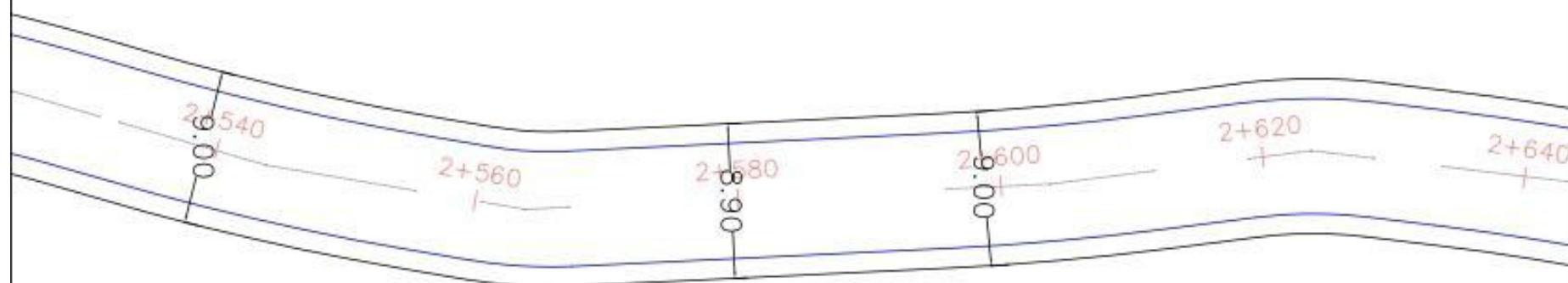




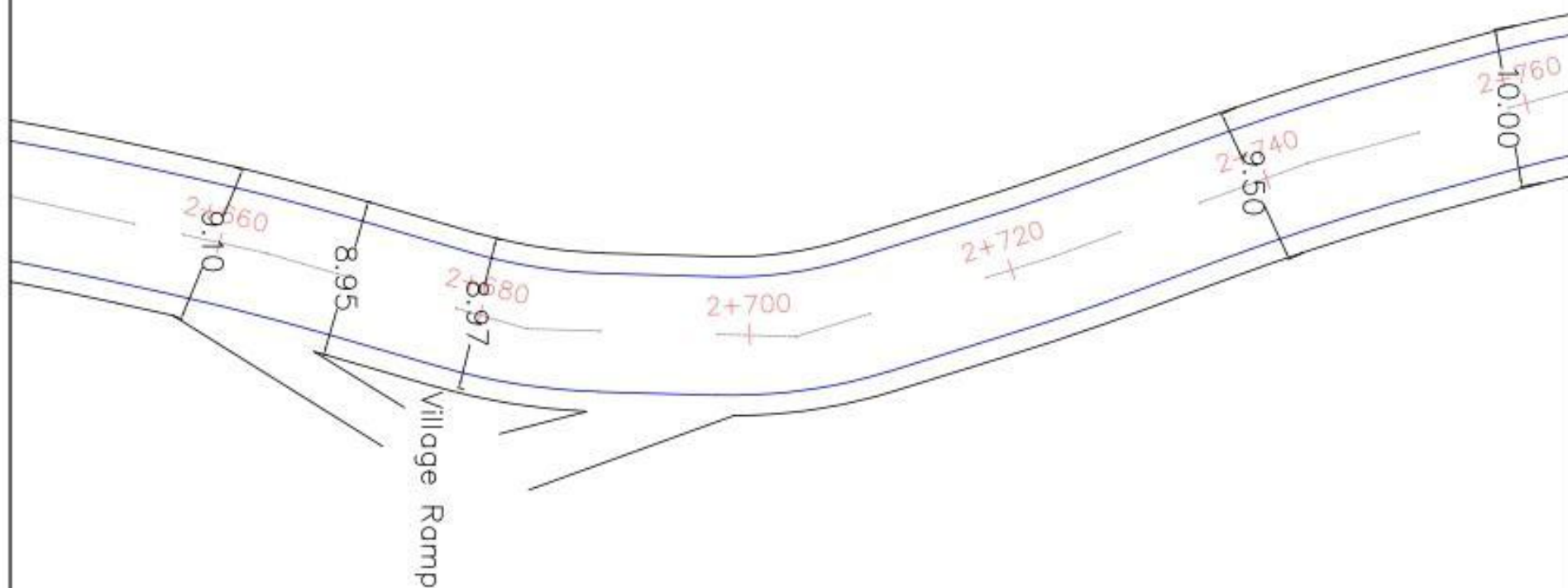
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Alignment/Linear Plan as per Available ROW RD  
2+000 to 2+860



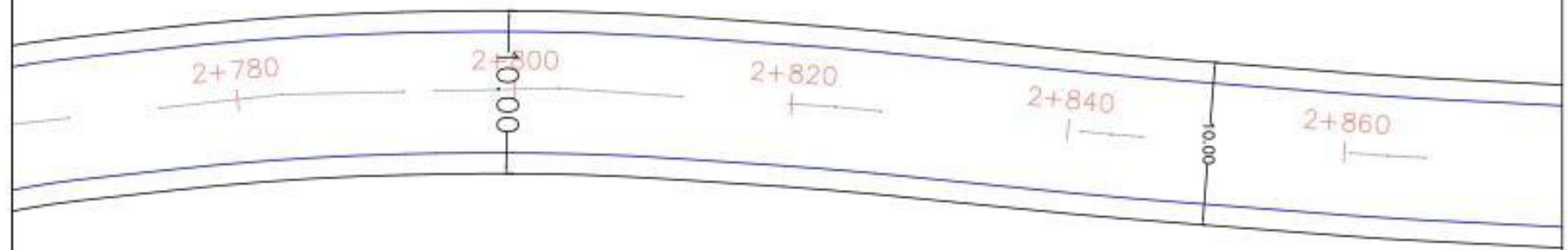
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Alignment/Linear Plan as per Available ROW RD  
2+000 to 2+860



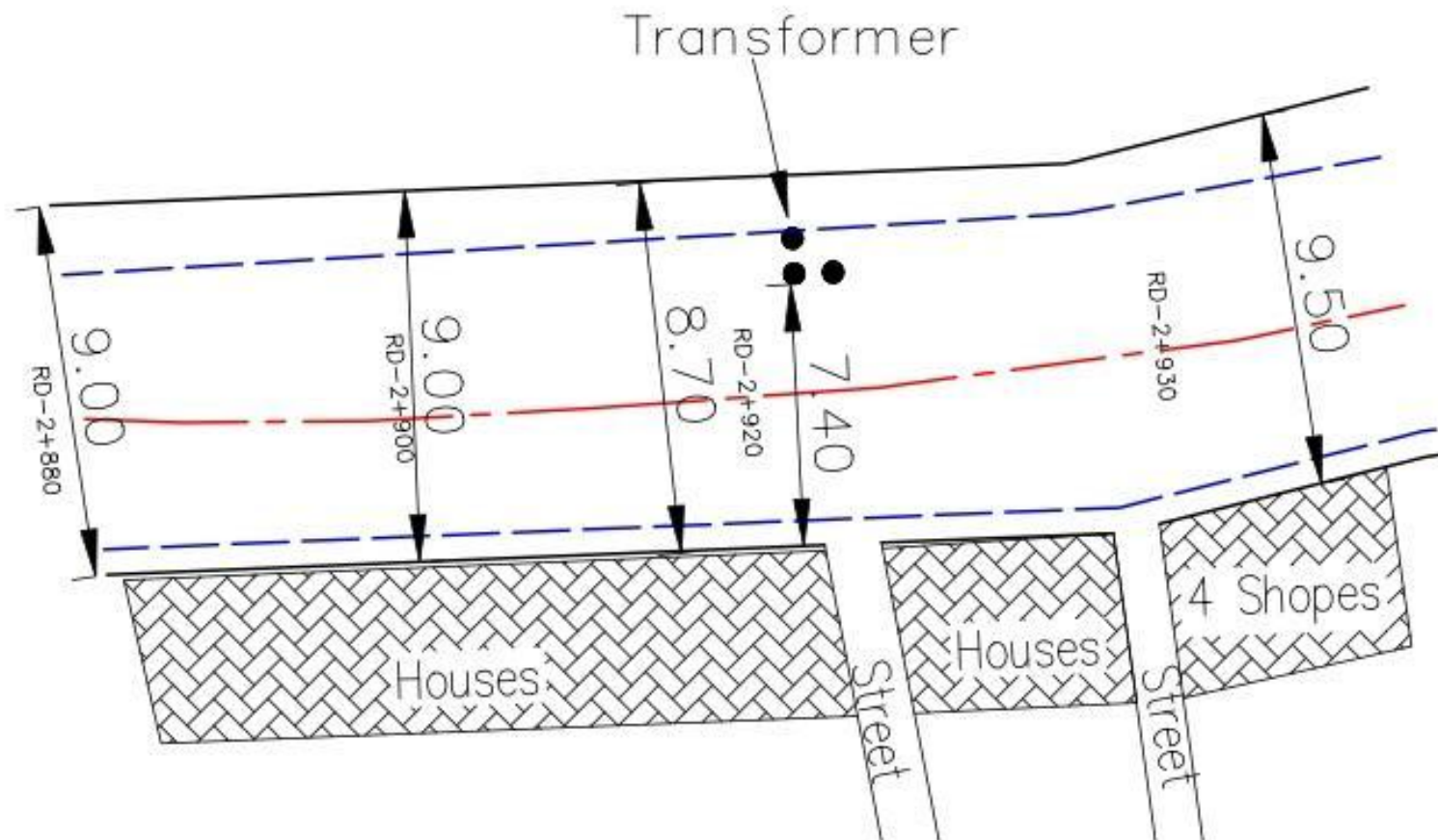
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Alignment/Linear Plan as per Available ROW RD  
2+000 to 2+860



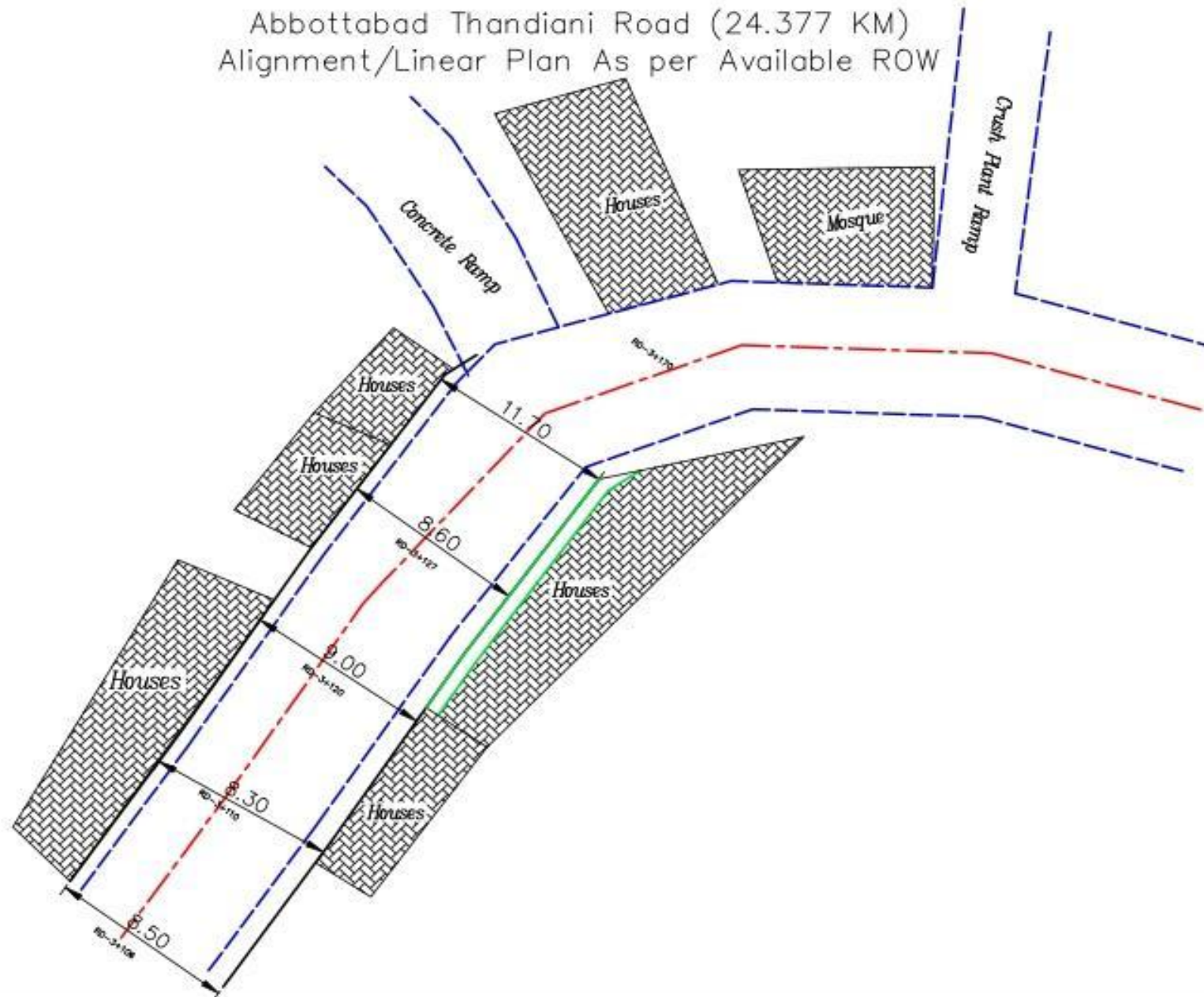
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Alignment/Linear Plan as per Available ROW RD  
2+000 to 2+860



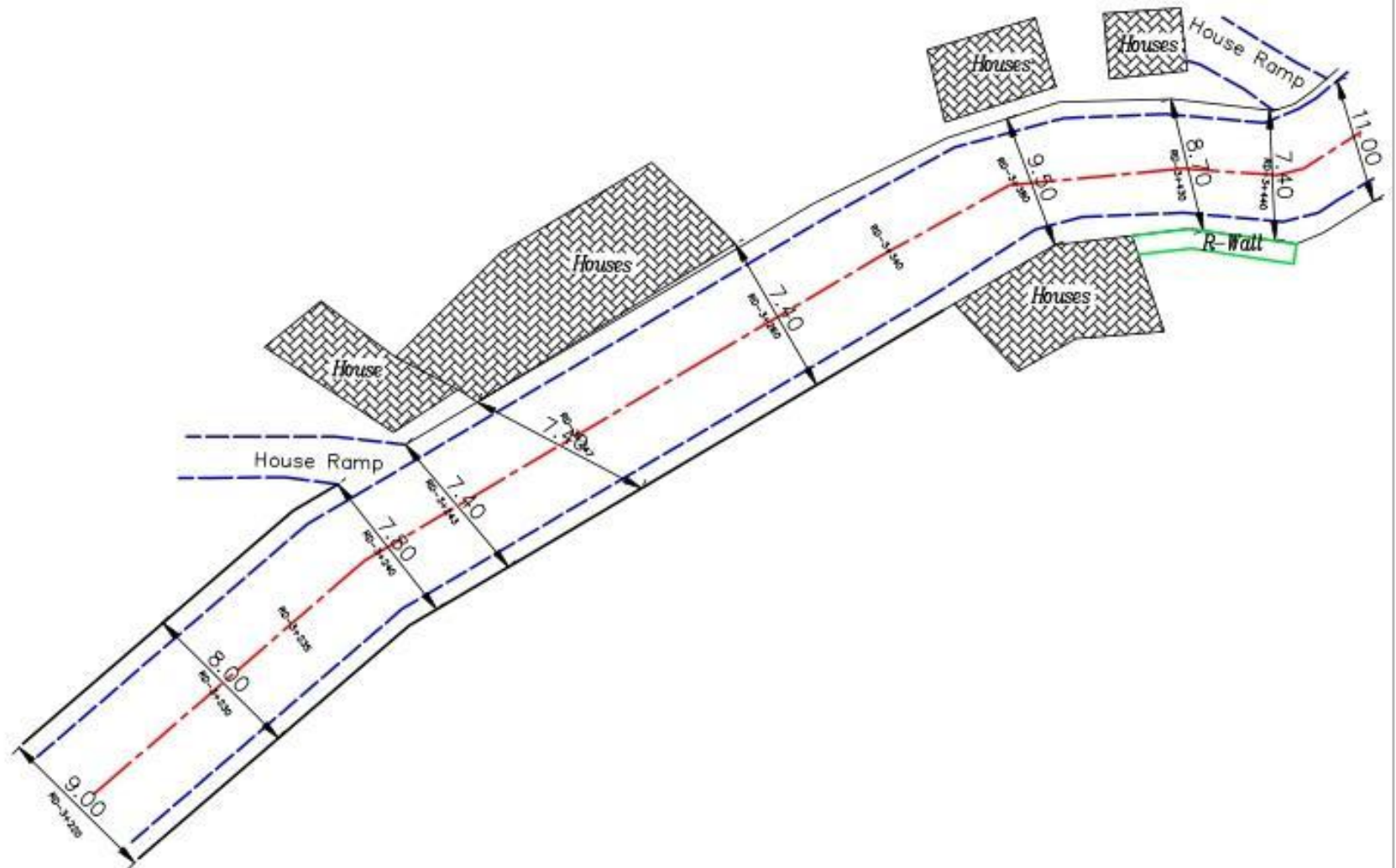
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Alignment/Linear Plan As per Available ROW



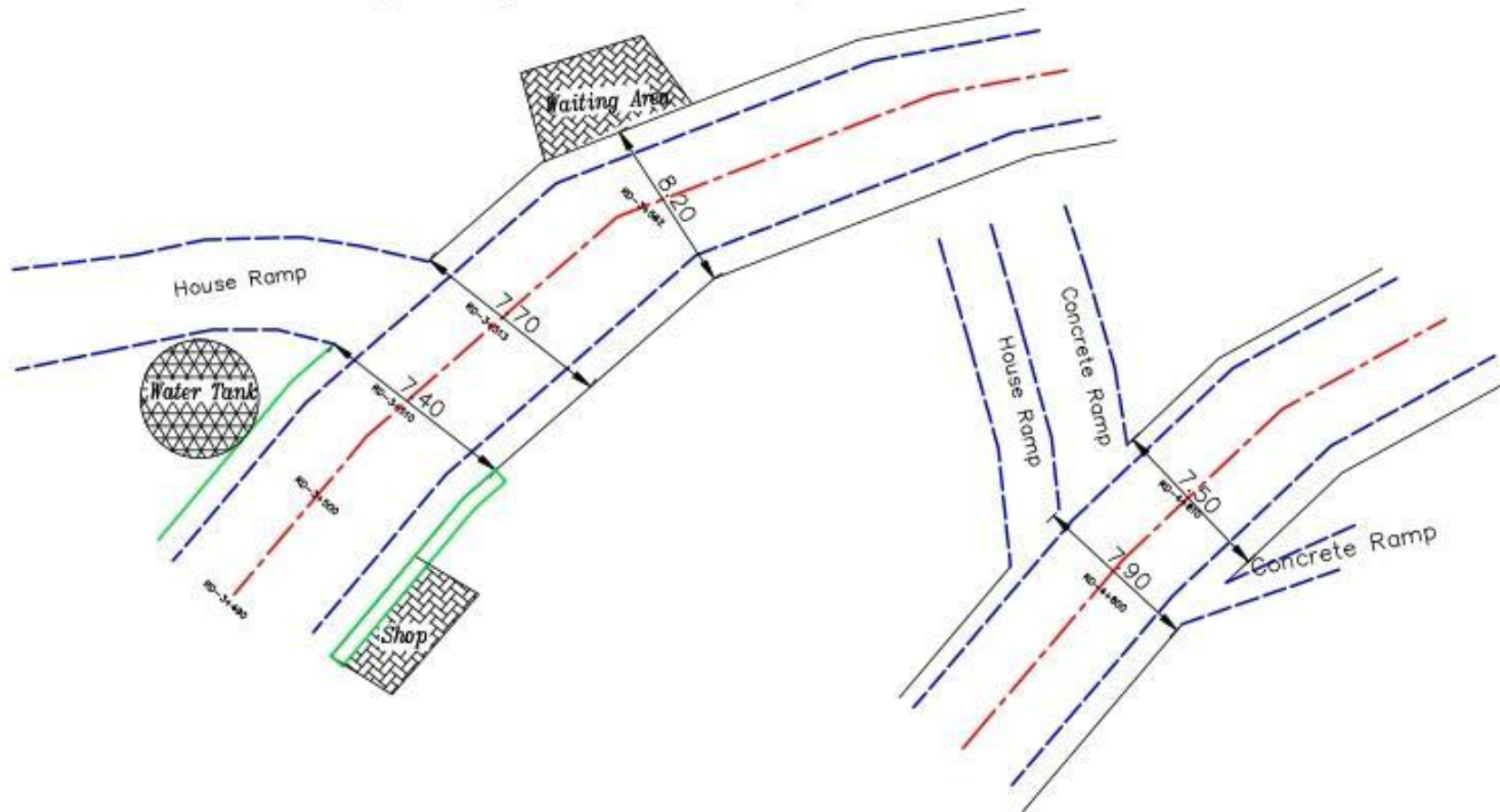
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Alignment/Linear Plan As per Available ROW



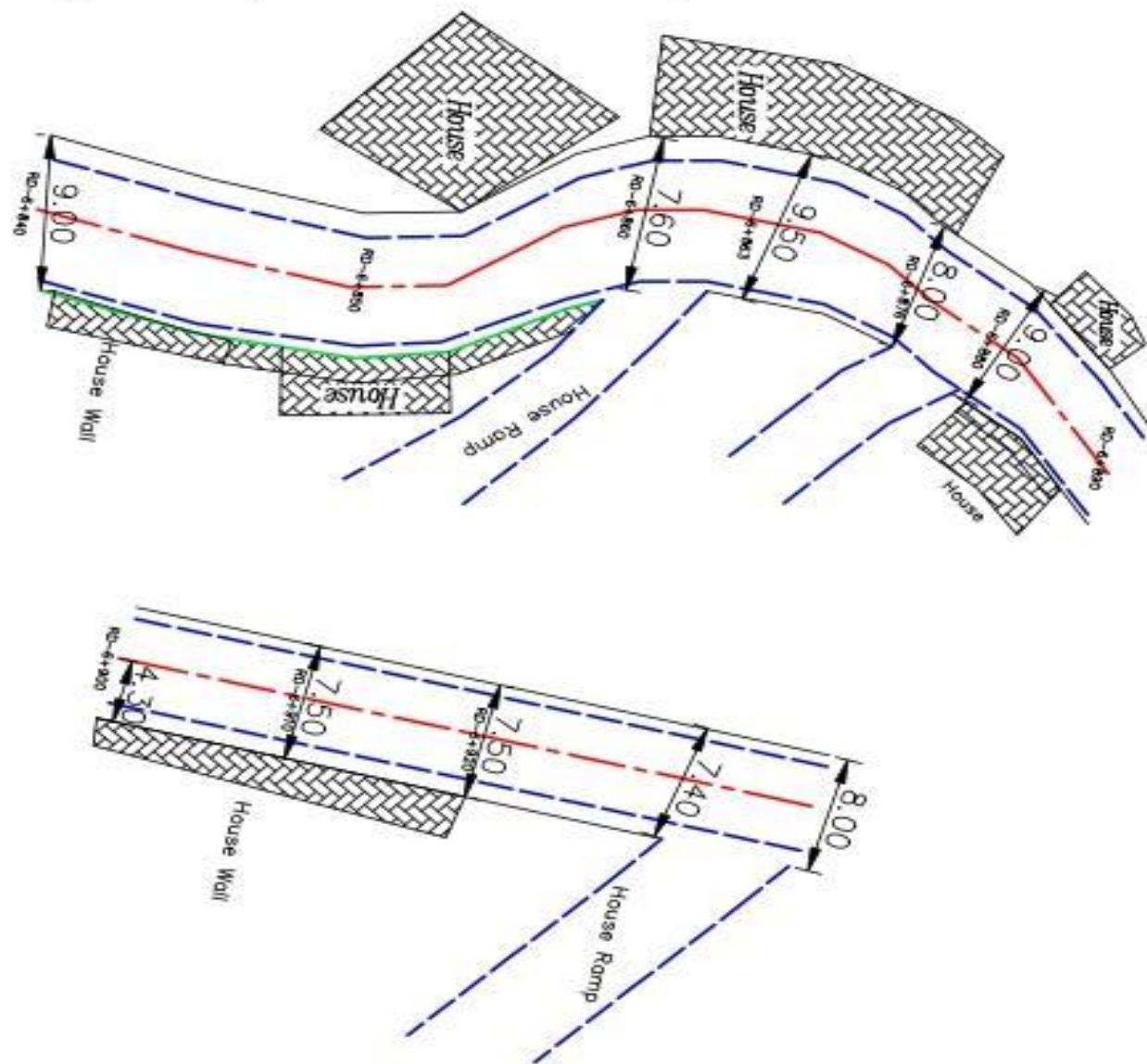
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Alignment/Linear Plan As per Available ROW



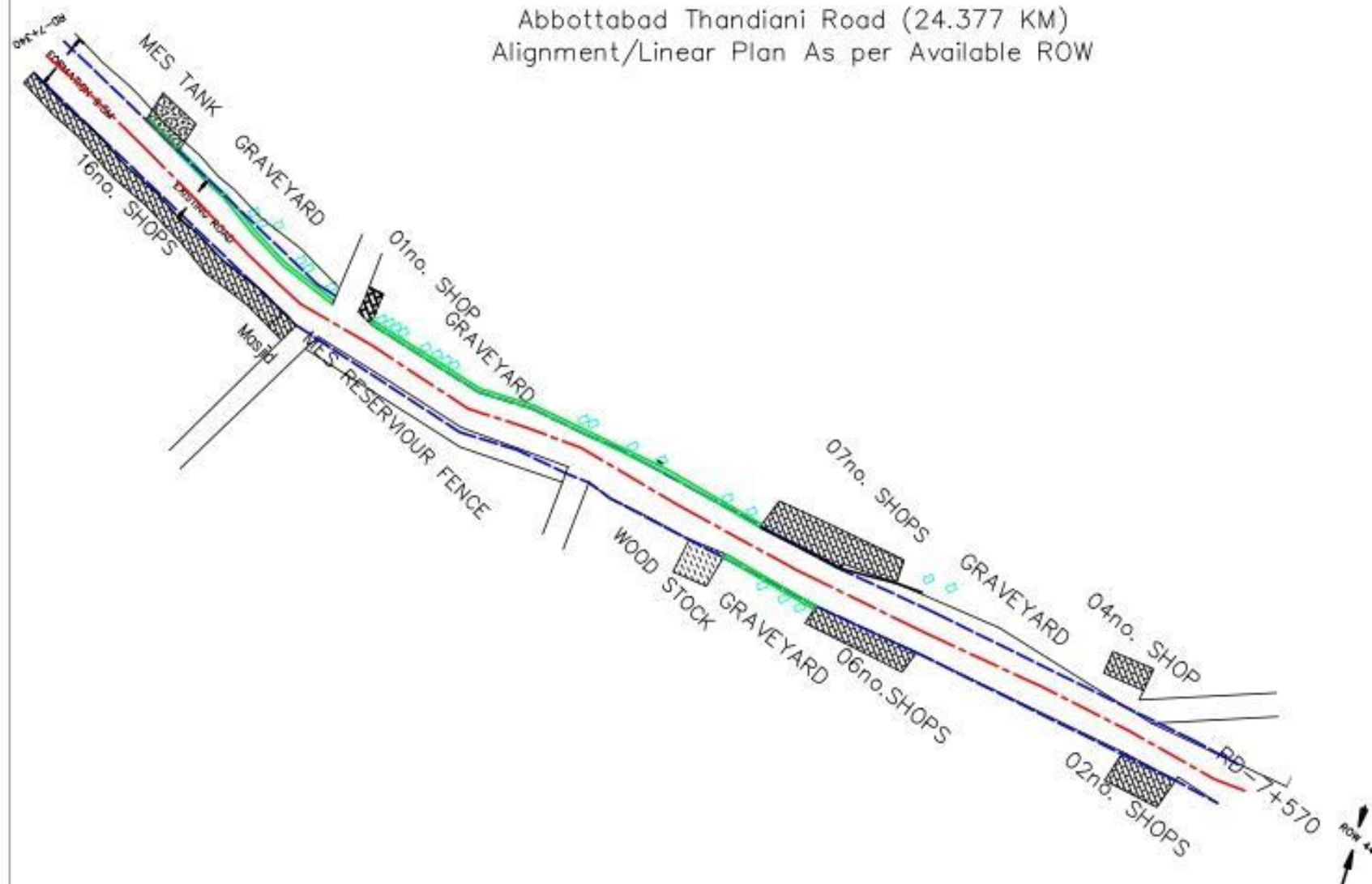
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Alignment/Linear Plan As per Available ROW



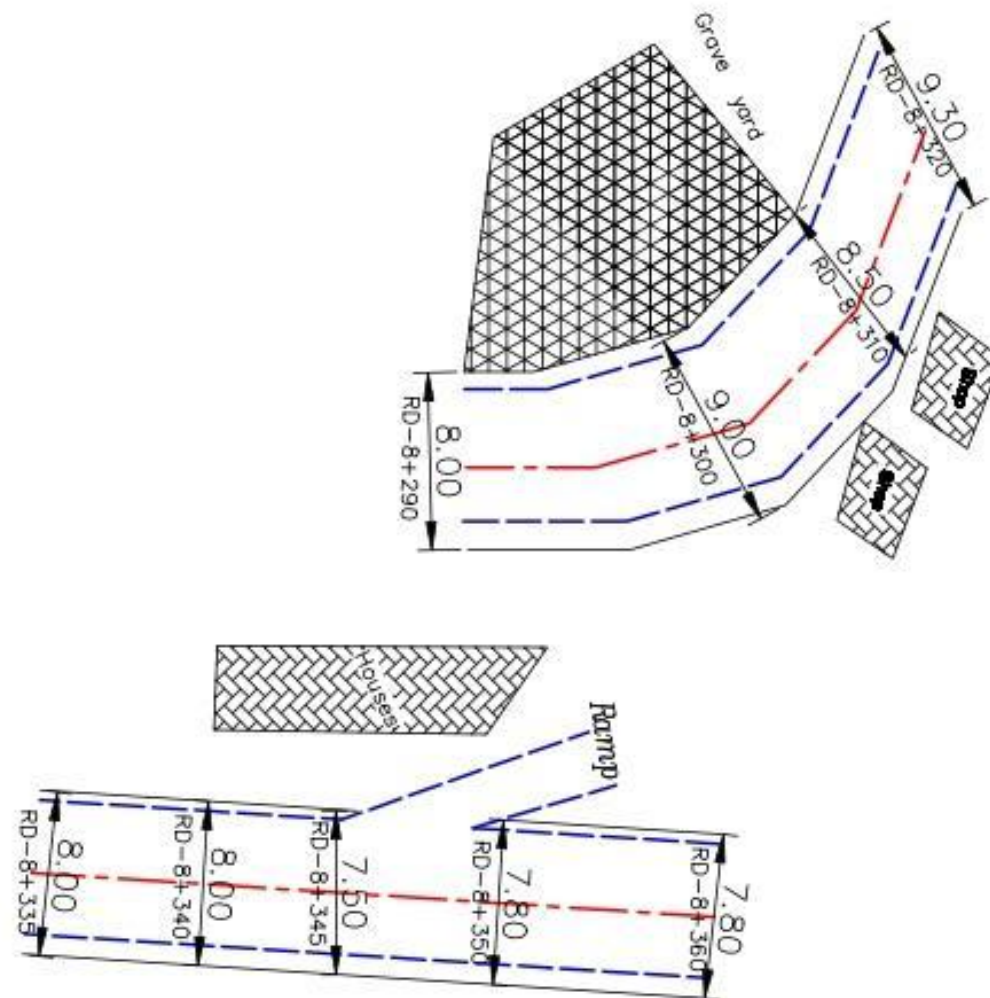
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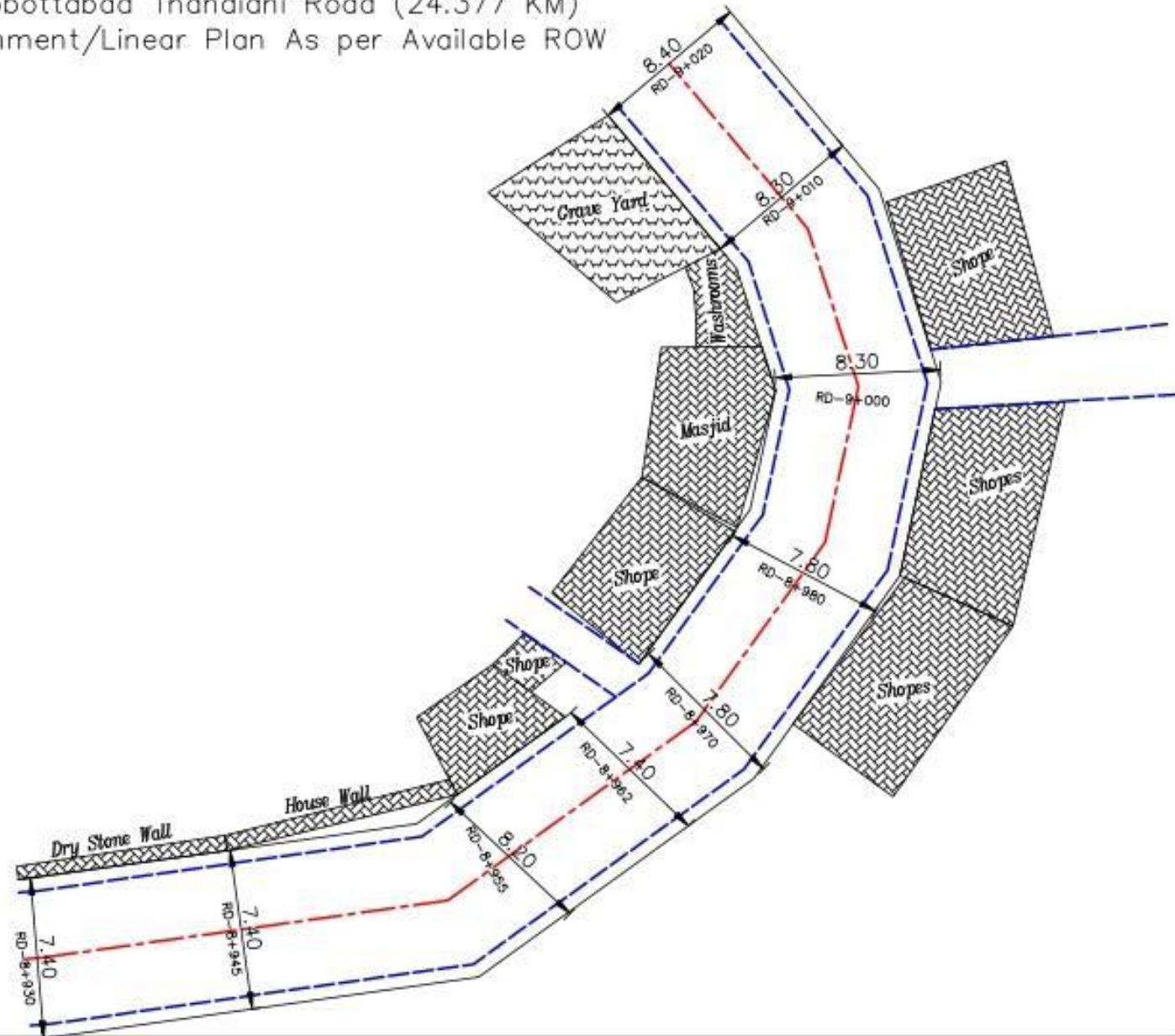
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Alignment/Linear Plan As per Available ROW



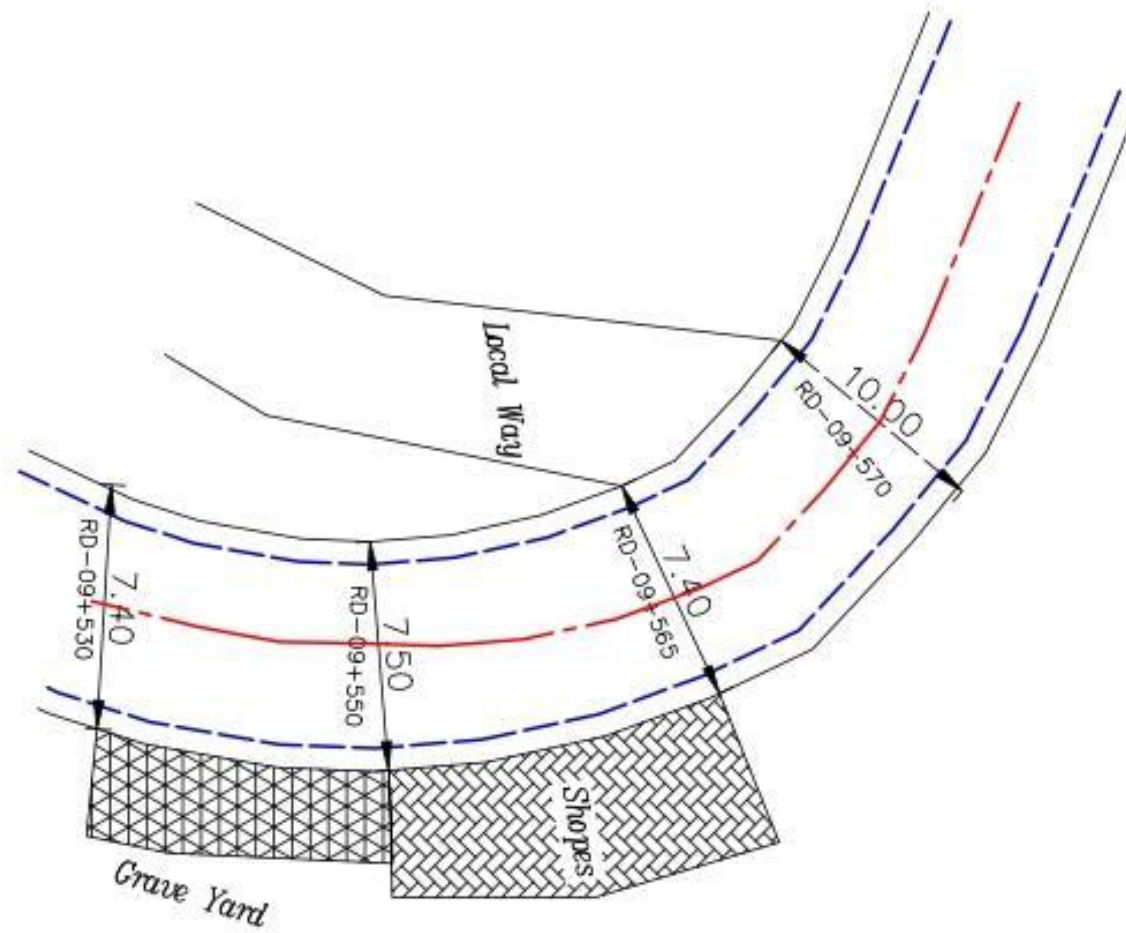
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Alignment/Linear Plan As per Available ROW



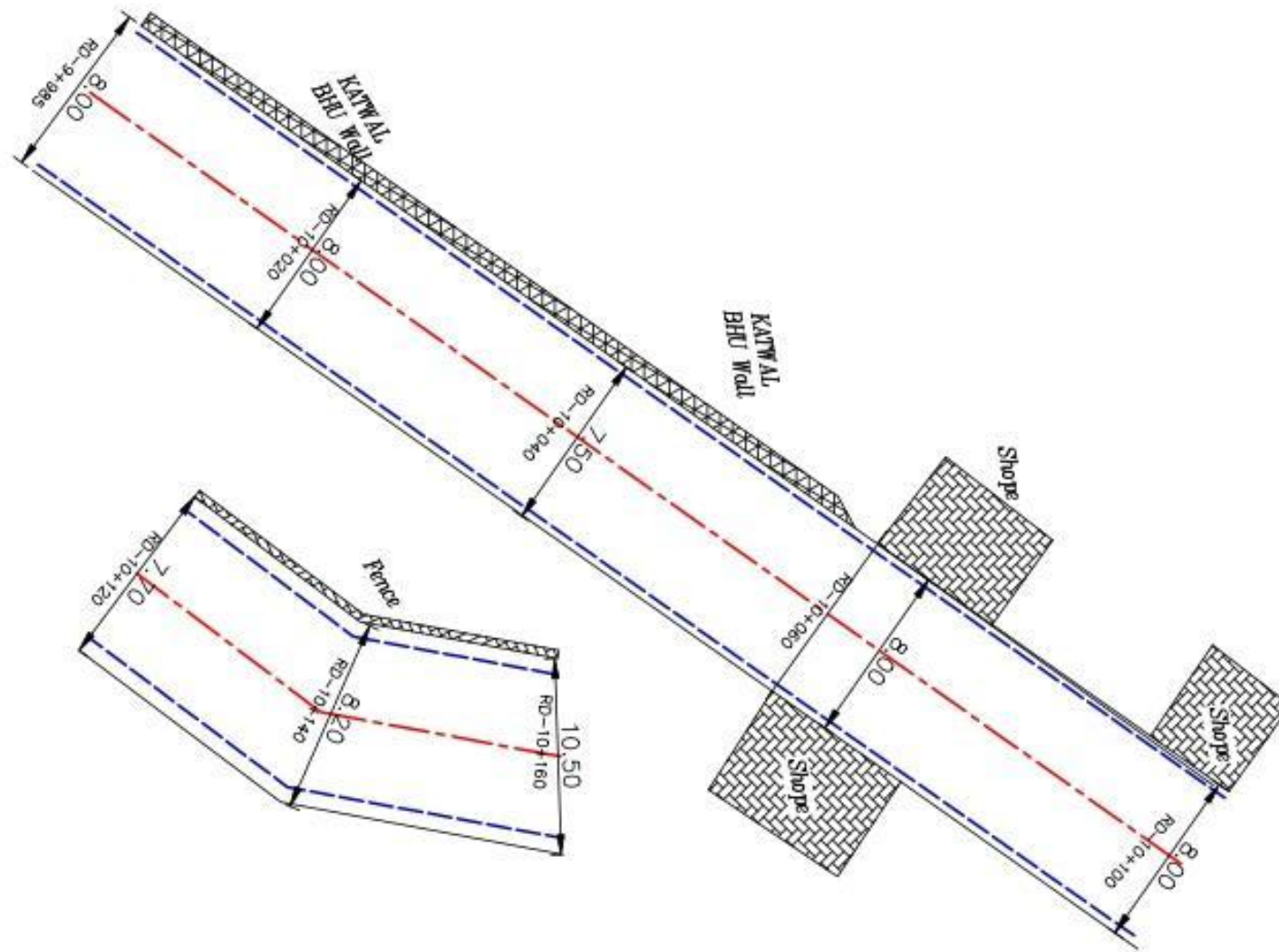
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Alignment/Linear Plan As per Available ROW



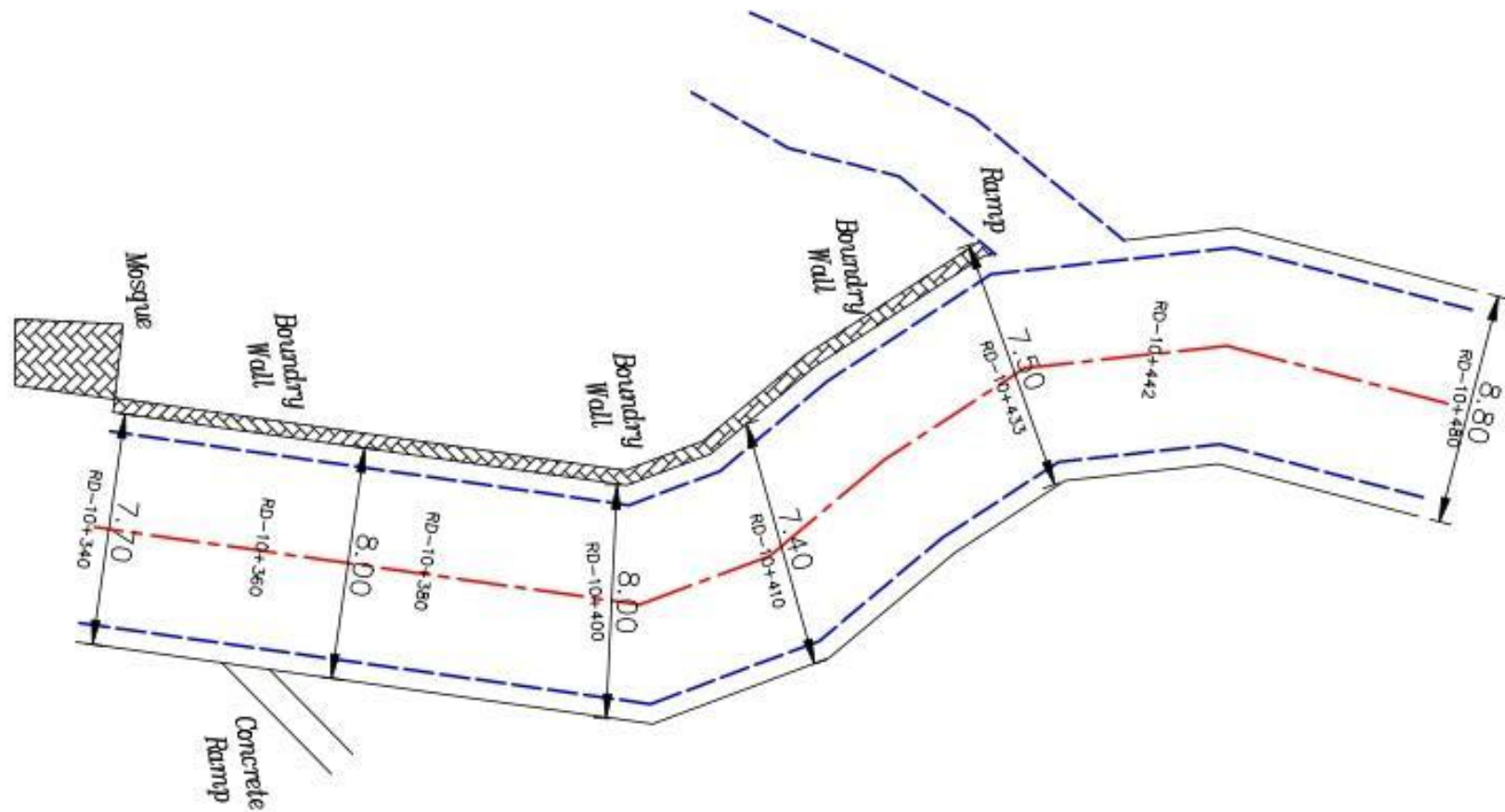
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Alignment/Linear Plan As per Available ROW



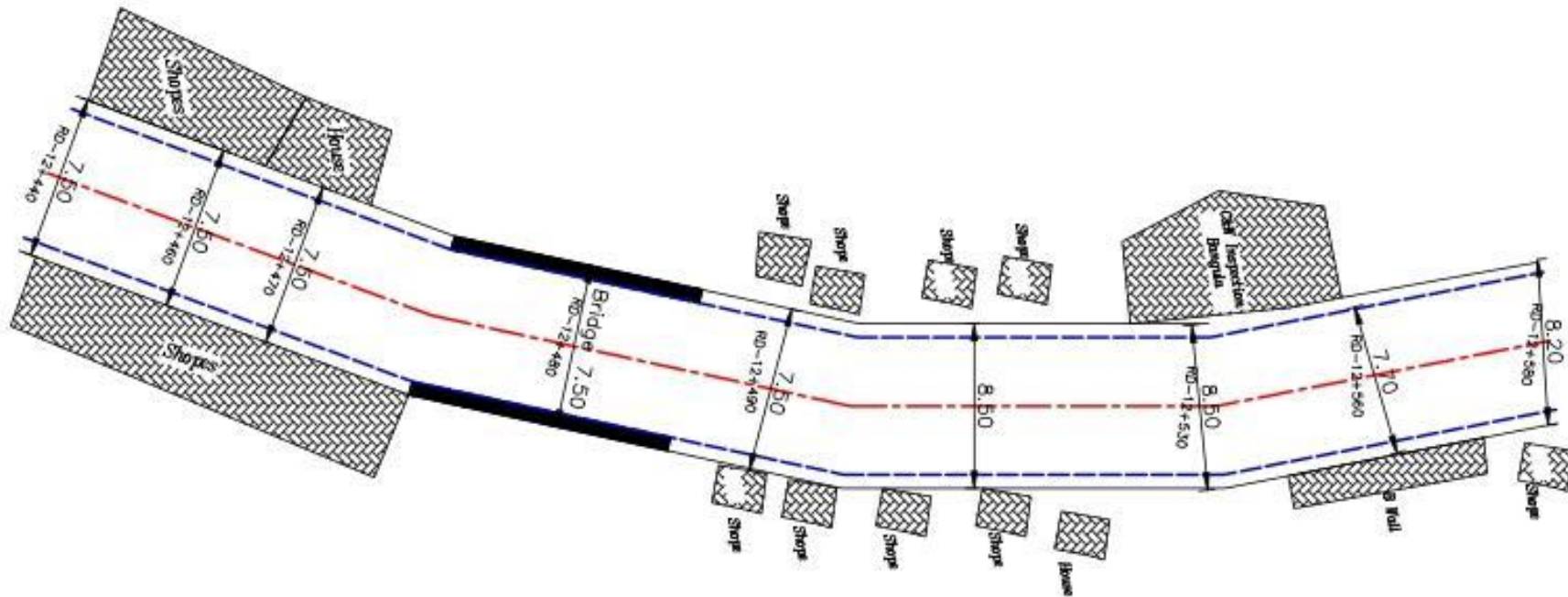
# Abbottabad Thandiani Road (24.377 KM) Alignment/Linear Plan As per Available ROW



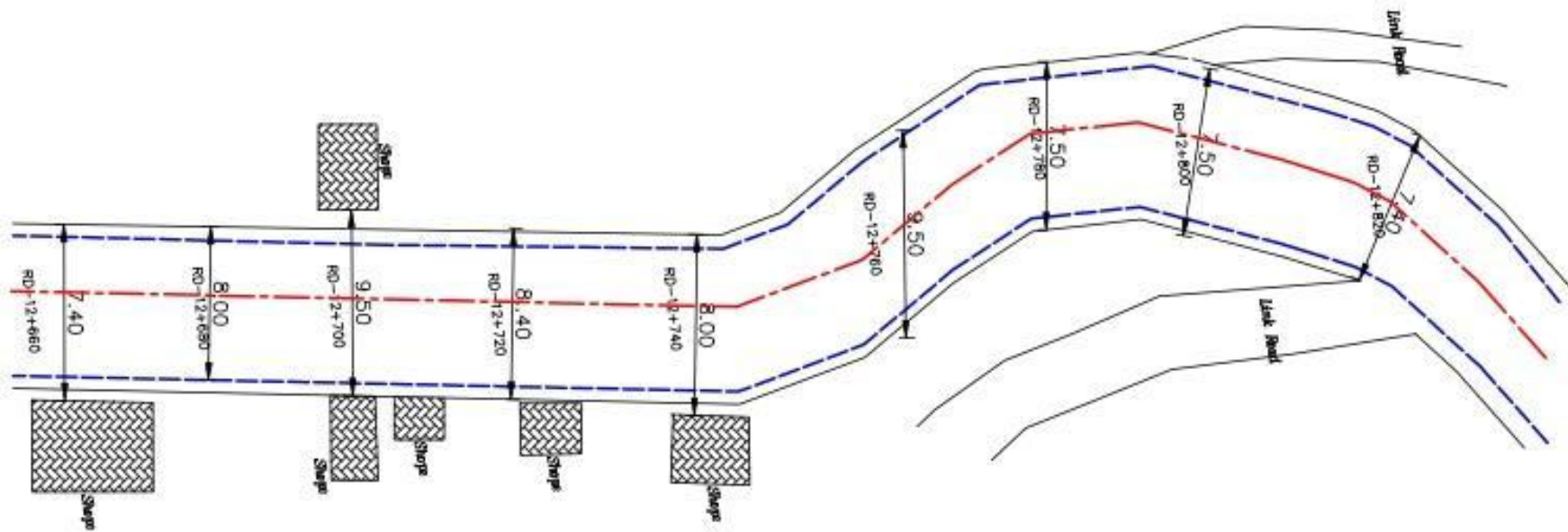
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Alignment/Linear Plan As per Available ROW



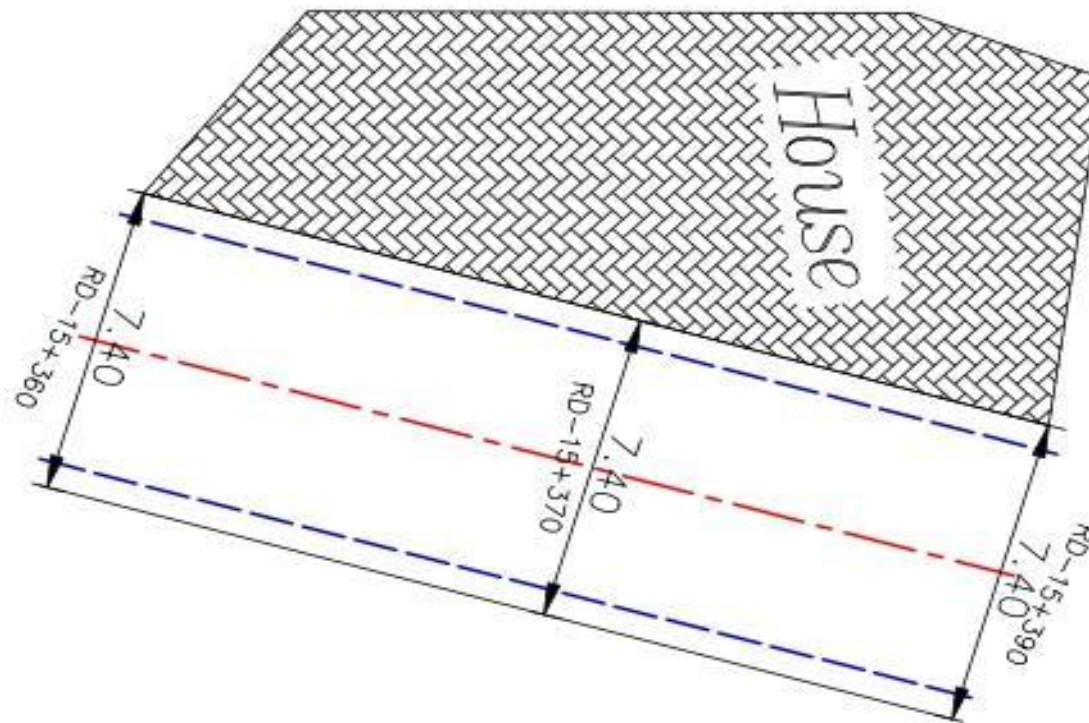
Abbottabad Thandiani Road (24.377 KM)  
 Alignment/Linear Plan As per Available ROW



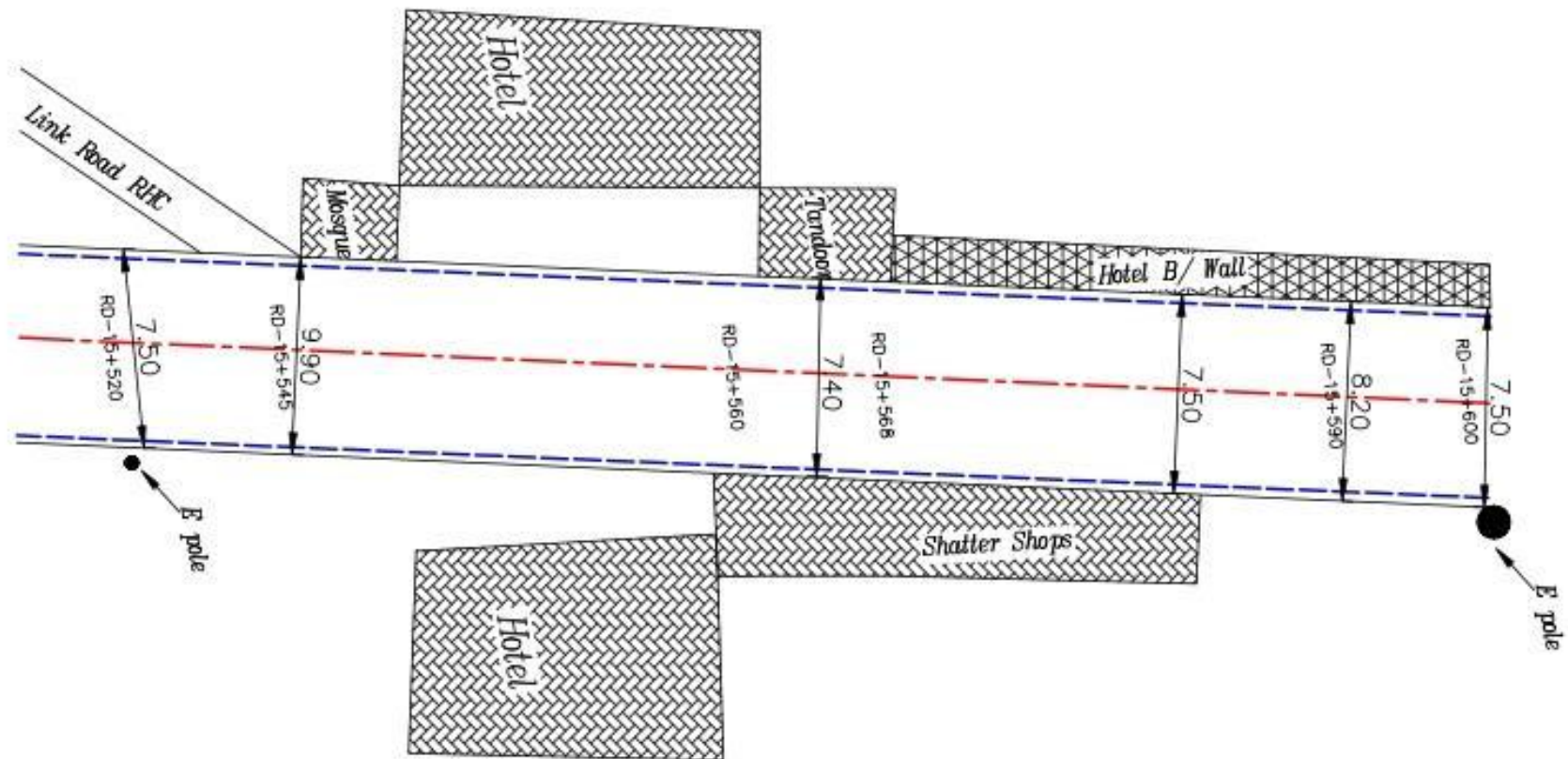
Abbottabad Thandiani Road (24.377 KM)  
Alignment/Linear Plan As per Available ROW



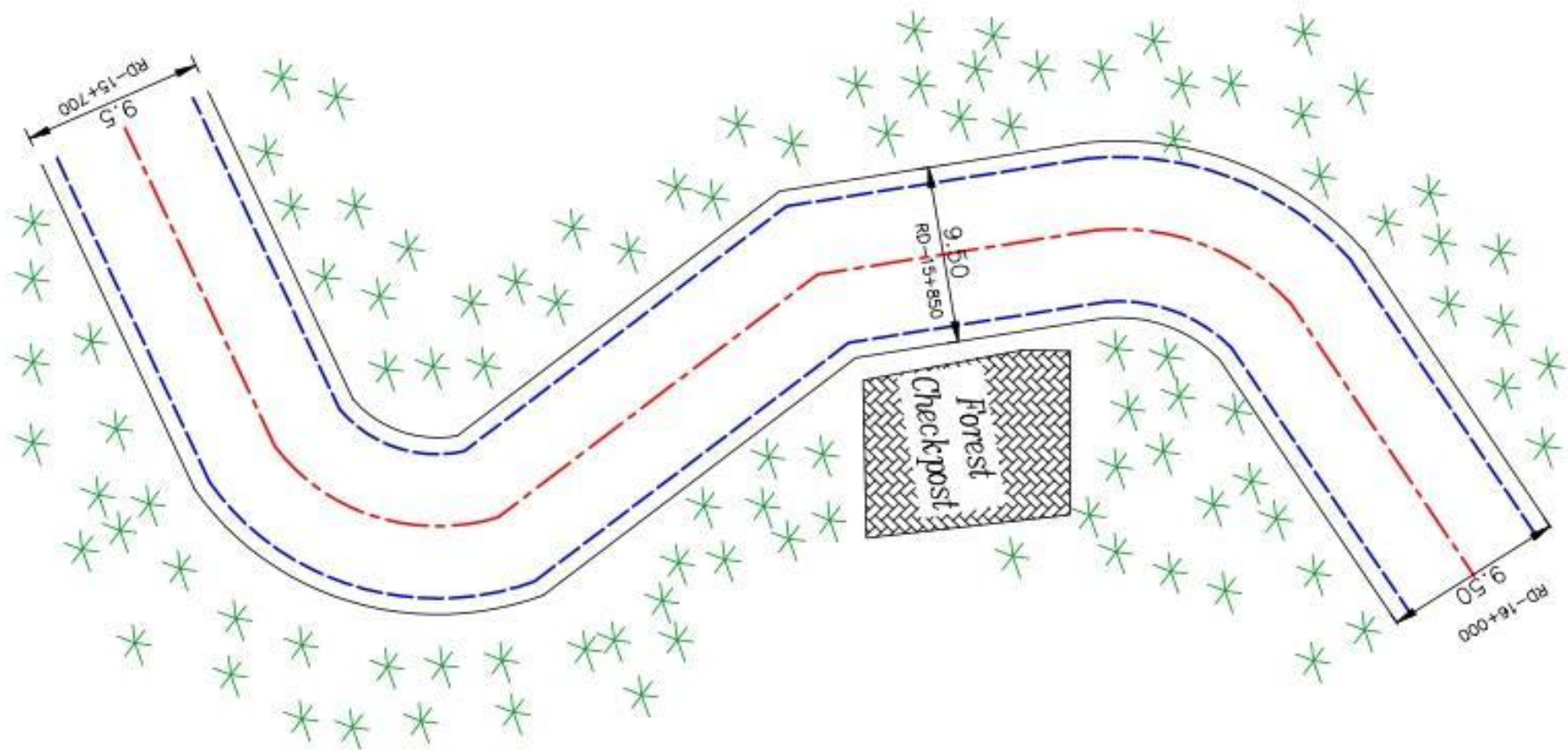
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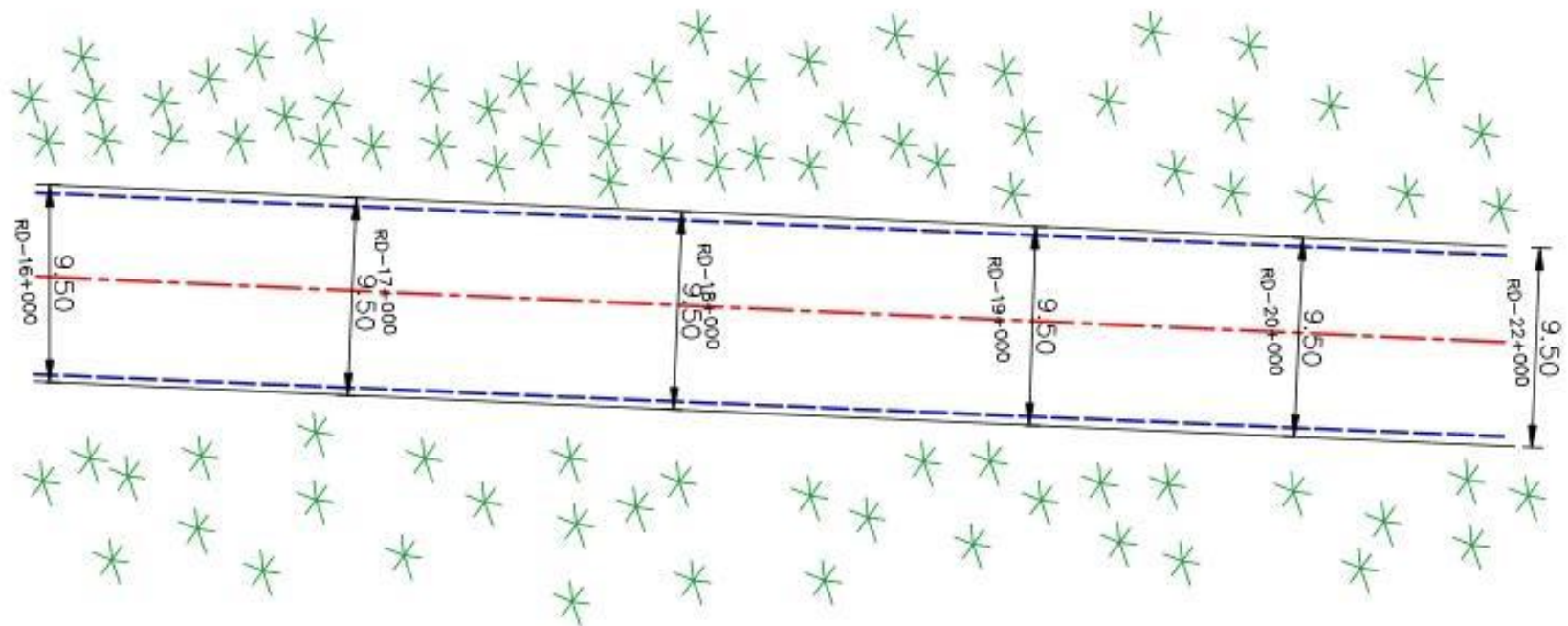
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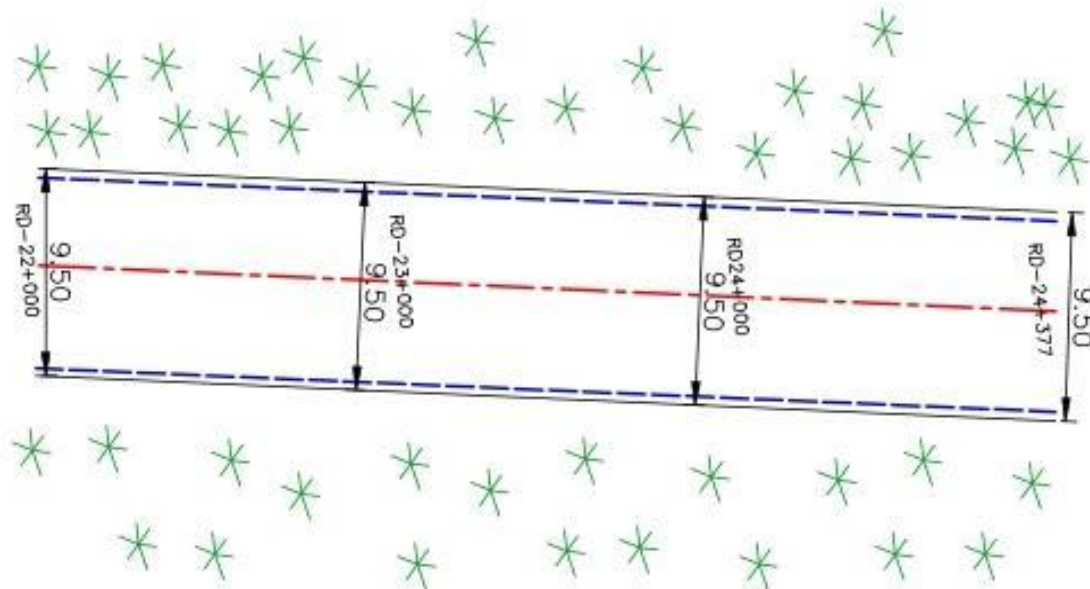
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Alignment/Linear Plan As per Available ROW



Abbottabad Thandiani Road (24.377 KM)  
Alignment/Linear Plan As per Available ROW



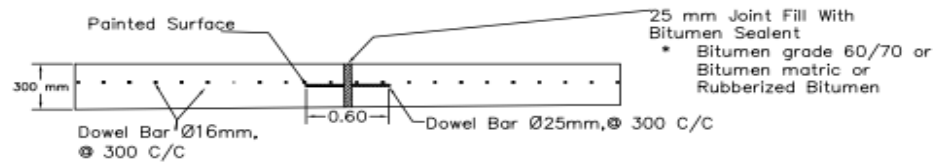
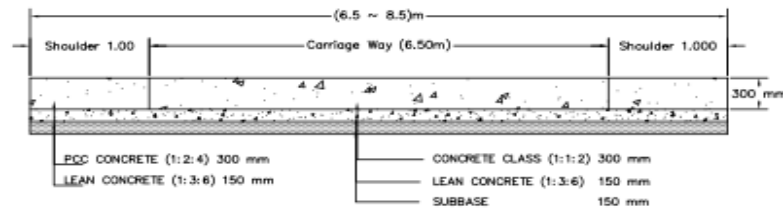
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Alignment/Linear Plan As per Available ROW



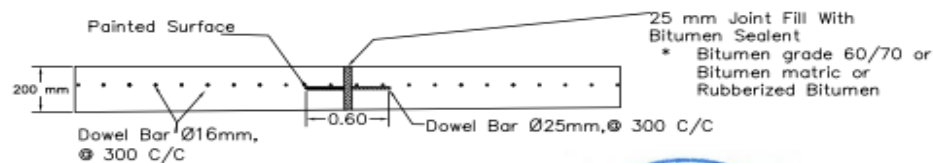
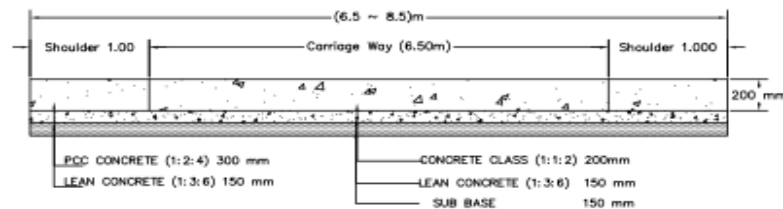
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  - C/w Edge ————
  - Shoulder Edge ————
  - Retaining Wall ————
  - Trees \*

## **TYPICAL CROSS SECTION**

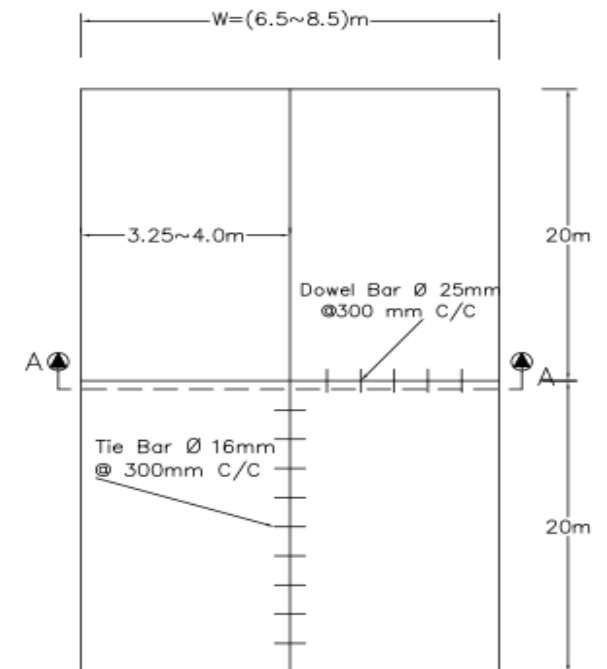
## RIGID PAVEMENT TYPICAL X-SECTION



From RD 0+000 to 3+500  
Section AA



From RD 3+500 to 24+377  
Section AA



PANEL ARRANGEMENT



KHYBER PAKHTUNKHWA  
INTEGRATED TOURISM AND  
ENTERPRISE DEVELOPMENT  
PROJECT C&W  
DEPARTMENT, KP



NATIONAL ENGINEERING SERVICES  
PAKISTAN (PVT).



July, 2024

October, 2022

DWG No.  
38164/102/TD/

Rev.

Date

Description

Approved

DRAWN

SUBMITTED

RECOMMENDED

CHD./VER.

Approved

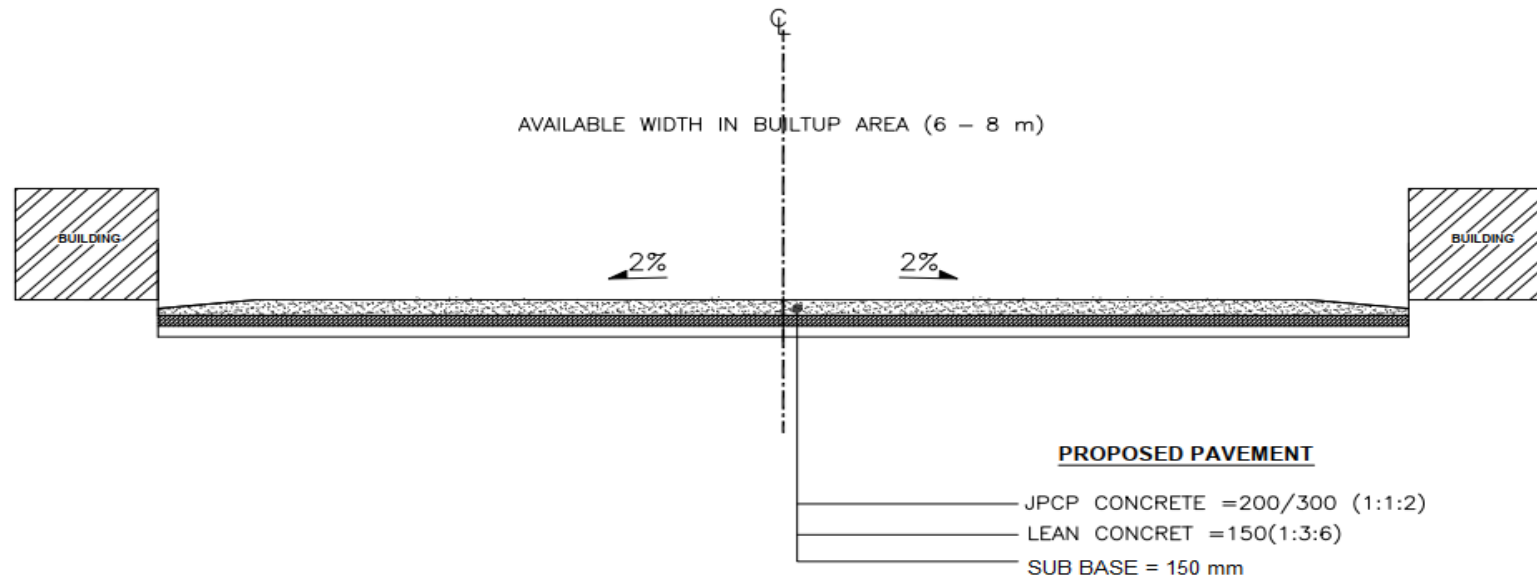
TITLE

RIGID PAVEMENT DESIGN

PROJECT

REHABILITATION AND UPGRADING  
OF THANDIANI ROAD IN DISTRICT  
ABBOTTABAD - 24.377 KM

# **ABBOTTABAD THANDIANI ROAD** **TYPICAL ROAD CROSS SECTION** **BUILT UP AREA**



- NOTE:-
- AS PER DECISION OF PDWP, NO ENCHROCHMENTS SHALL BE REMOVED.
- CARRIAGEWAY WIDTH BE PROVIDED AS PER AVAILABLE WIDTH.
- SHOULDERS AND DRAIN BE PROVIDED AS PER ALLOWANCE OF AVAILABLE WIDTH.

KHYBER PAKHTUNKHWA  
 INTEGRATED TOURISM DEVELOPMENT PROJECT  
 (PMA) CS&V DEPARTMENT KP

**NATIONAL ENGINEERING SERVICES**  
**PAKISTAN (PVT.) LTD.**

|      |      |             |          |  |  |
|------|------|-------------|----------|--|--|
| 04   |      |             |          |  |  |
| 03   |      |             |          |  |  |
| 02   |      |             |          |  |  |
| 01   |      |             |          |  |  |
| REV. | DATE | DESCRIPTION | APPROVED |  |  |

|             |  |
|-------------|--|
| DRAWN BY    |  |
| DESIGNED BY |  |
| CHECKED BY  |  |
| APPROVED BY |  |

REHABILITATION & REMODELING OF ABBOTTABAD  
 THANDIANI ROAD (LENGTH: 24.377 KM)  
 DISTRICT ABBOTTABAD  
 LOT-01 & 02

|       |                    |         |                   |       |
|-------|--------------------|---------|-------------------|-------|
| TITLE | TYPICAL X-SECTIONS |         |                   | SCALE |
| DATE  | AUG, 2024          | DWG NO. | 4189/102/CD/XS001 | REV.  |





**Annex-D**  
**INVOLUNTARY RESETTLEMENT CHECKLIST**

## INVOLUNTARY RESETTLEMENT IMPACT CHECKLIST

Date: 27-08-2025

| Probable Involuntary Resettlement Effects                                                                | Yes | No | Not Known | Remarks                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------|-----|----|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Involuntary Acquisition of Land</b>                                                                   |     |    |           |                                                                                                                                                                                                                                                                                                                                                                                                      |
| 1. Will there be land acquisition?                                                                       |     | ✓  |           | There will be no impact on the local community with respect to land acquisition or displacement of assets as construction work will be carried out in the existing ROW, which is owned by the C&W department. Moreover, no Land Acquisition, no resettlement, no legacy issues, no encroachment or third party uses, no disputes among nearby communities about the construction work are envisaged. |
| 2. Is the site for land acquisition known?                                                               |     | ✓  |           | Not Applicable as no land acquisition is involved in the respective construction work.                                                                                                                                                                                                                                                                                                               |
| 3. Is the ownership status and current usage of land to be acquired known?                               |     | ✓  |           | Same as above                                                                                                                                                                                                                                                                                                                                                                                        |
| 4. Will easement be utilized within an existing Right of Way (ROW)?                                      |     | ✓  |           | No easement will be disturbed                                                                                                                                                                                                                                                                                                                                                                        |
| 5. Will there be loss of shelter and residential land due to land acquisition?                           |     | ✓  |           | No loss of shelter is involved.                                                                                                                                                                                                                                                                                                                                                                      |
| 6. Will there be loss of agricultural and other productive assets due to land acquisition?               |     | ✓  |           | No loss of agricultural and other productive assets as no land acquisition is involved.                                                                                                                                                                                                                                                                                                              |
| 7. Will there be losses of crops, trees, and fixed assets due to land acquisition?                       |     | ✓  |           | No loss of crops, trees, and fixed assets as no land acquisition is involved.                                                                                                                                                                                                                                                                                                                        |
| 8. Will there be loss of businesses or enterprises due to land acquisition?                              |     | ✓  |           | No loss of businesses or enterprises as no land acquisition is involved.                                                                                                                                                                                                                                                                                                                             |
| 9. Will there be loss of income sources and means of livelihoods due to land acquisition?                |     | ✓  |           | No loss of income sources and means of livelihoods as no land acquisition is involved.                                                                                                                                                                                                                                                                                                               |
| <b>Involuntary restrictions on land use or on access to legally designated parks and protected areas</b> |     |    |           |                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10. Will people lose access to natural resources, communal facilities, and services?                     |     | ✓  |           | There is no impact on such resources and services as the construction work will be carried out within the existing ROW owned by C&W department.                                                                                                                                                                                                                                                      |
| 11. If land use is changed, will it have an adverse impact on social and economic activities?            |     | ✓  |           | No change is envisaged to occur in existing land use.                                                                                                                                                                                                                                                                                                                                                |
| 12. Will access to land and resources owned communally or by the state be restricted?                    |     | ✓  |           | There is no restriction on such resources as the construction work will be carried out within the existing ROW owned by C&W department. Therefore, no impact is envisaged on the current land use.                                                                                                                                                                                                   |
| <b>Information on Affected Persons:</b>                                                                  |     |    |           |                                                                                                                                                                                                                                                                                                                                                                                                      |
| Any estimate of the likely number of persons that will be displaced by the Project?                      |     |    |           | [✓] No [ ] Yes                                                                                                                                                                                                                                                                                                                                                                                       |
| If yes, approximately how many? <u>N/A</u>                                                               |     |    |           |                                                                                                                                                                                                                                                                                                                                                                                                      |
| Are any of them poor, female-heads of households, or vulnerable to poverty risks?                        |     |    |           | [✓] No [ ] Yes                                                                                                                                                                                                                                                                                                                                                                                       |
| Are any affected persons from indigenous or ethnic minority groups?                                      |     |    |           | [✓] No [ ] Yes                                                                                                                                                                                                                                                                                                                                                                                       |

## **PHOTOGRAPHS FROM SITE VISITS**

#### Annex-IV: Photographic View of Consultation Meetings with Stakeholders



Meeting with ARE



Meeting with the Representatives of C&WD



Meeting with EPA-Abbottabad



Meeting with DFO-Wildlife Division, Abbottabad



Consultation Session with AD-GDA, Abbottabad



Consultation Session with Locals/Affectees

**Photographic View of Consultation Meetings with Stakeholders**



Public Consultation at Rawalakot



Public Consultation at Kalay Pani



Public Consultation at Gali Baniyan



Public Consultation at Ghumawan



Public Consultation at Kalay Pani



Public Consultation at School Gali



Public Consultation at Gali Bnaiyan



Public Consultation at Kalay Pani



Consultation Meeting at Kalay Pani Bazar



Consultation Meeting with PAPs at Kund Bazar



Consultation Meeting with PAPs at Kund Bazar



Meeting with Revenue Staff (Patwaries) at Abbottabad



Meeting with SDO-Irrigation, Subdivision Abbottabad



Meeting with SDO-Building Division, C&WD, Subdivision Abbottabad

