

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTH ZONE AT
CHENNAI
O.A.No.110 of 2022**

Dr. C. Manohar & 3 ors.

...Applicants

-Vs.-

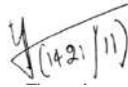
The Corporation of Chennai & 2 ors

...Respondents

INDEX TO TYPED SET OF PHOTOGRAPHS

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2.	10.03.2023 to 29.03.2023	Photographs documenting status of debris removal and restoration of subject ground	3

//The above are certified as true copies of their respective originals//



Yogeshwaran. A
Counsel for the Applicants

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTH ZONE AT
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O.A.No.110 of 2022

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...Applicants

-Vs.-

The Corporation of Chennai & 2 ors

...Respondents

AFFIDAVIT OF SUBHASREE MANOHAR

I, Subhasree Manohar, W/o Dr.C.Manohar, aged about 59 years and having permanent residence at No.39, 2nd Cross Street, Saibaba Colony, Virugambakkam, Chennai – 600 092, do hereby solemnly affirm and sincerely state as follows:

1. I am the 3rd Applicant herein and as such am well acquainted with the facts and circumstances leading to the present Application. I am swearing to the present affidavit on my behalf and on behalf of the other 3 Applicants.

2. On 27.03.2023, Mr. Satish, Assistant Engineer in the 3rd Respondent Board (hereinafter referred to as the AE, TNPCB), gave me notice that he will be inspecting the subject ground on 28.03.2023 at 9.00AM, pursuant to the orders of this Hon'ble Tribunal dated 09.03.2023. Accordingly, the following day, the AE, TNPCB arrived at the site and first met with the residents including myself to understand the background to our grievance. Later, certain officials of the 1st Respondent also joined the meeting. The designations of these officials could not be ascertained. The 2nd Respondent contractor's supervisors arrived only after multiple calls made by the AE, TNPCB.

3. The residents expressed concerns over the shoddy removal of construction and demolition debris undertaken by the 2nd Respondent as well as the deteriorating quality of air due to dust particles arising from the debris. We pointed to those portions of the ground where metal rods and cables were still hazardously protruding amidst scattered concrete debris. The AE, TNPCB took note of the same and instructed the 1st Respondent's officials to ensure that all the debris was removed thoroughly and the ground restored within a week's time.



4. Thereafter, the 2nd Respondent's men commenced removal of the debris, under the monitoring of the 1st Respondent's officials. The removal continued all through the afternoon and late evening of that day. We expected the removal to be completed by the next day, i.e. 29.03.2023, but work was halted. On the afternoon of 30.03.2023, the AE, TNPCB came to inspect the status of debris removal and recorded photographs at the site. He enquired about the progress of debris removal over the previous two days and I apprised him about the work having come to an abrupt halt. The AE, TNPCB took note of our grievance over incomplete removal and residual debris being left behind in a hazardous manner.

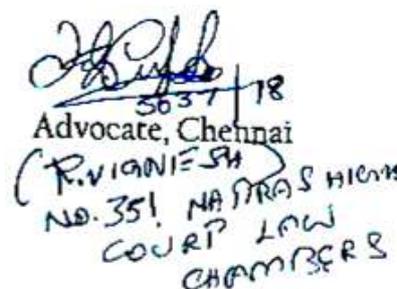
5. The following day, i.e. 31.03.2023, debris removal was resumed by the 1st and 2nd Respondents. While the protruding metal rods and cables were plucked, much of the concrete debris was crushed into the earth in order to level the ground. When the AE, TNPCB enquired about the progress of the work over a phone call, I shared photographs of the so-called levelling that had been undertaken. Thereafter, the debris removal was continued in fits and starts on a few more days in the month of April and it has been completed now to the satisfaction of the Applicants. Photographs taken to document the status of removal and restoration, and to present the actual condition of the ground as it stands now, are adduced along with this affidavit.

This Hon'ble Tribunal may be pleased to record the above stated facts along with the supporting photographic material and thus render justice.

Solemnly affirmed at Chennai
on this the 7th day of May 2023
and affixed her signature
in my presence.



Before Me



Advocate, Chennai
(R. VIGNISH)
NO. 351, NARAYANAS HIGHWAY
COURT LAW
CHAMBERS



GPS Map Camera



Chennai, Tamil Nadu, India

38/3, First Floor, Salim Orchid Apartments,, Saibaba colony
link road, Virugambakkam, Saibaba Colony, L & T Colony
Phase II, Virugambakkam, Chennai, Tamil Nadu 600092, India

Lat 13.054363°

Long 80.193529°

10/03/23 04:37 PM GMT +05:30

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GPS Map Camera

Chennai, Tamil Nadu, India

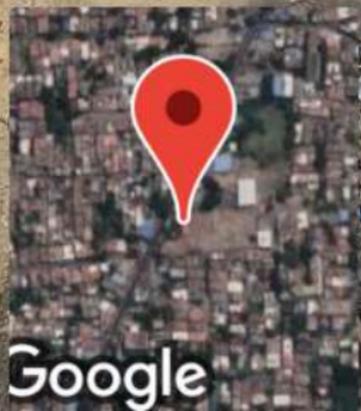
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Virugambakkam, Chennai, Tamil Nadu 600092, India

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Google

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GPS Map Camera

Chennai, Tamil Nadu, India

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600092, India

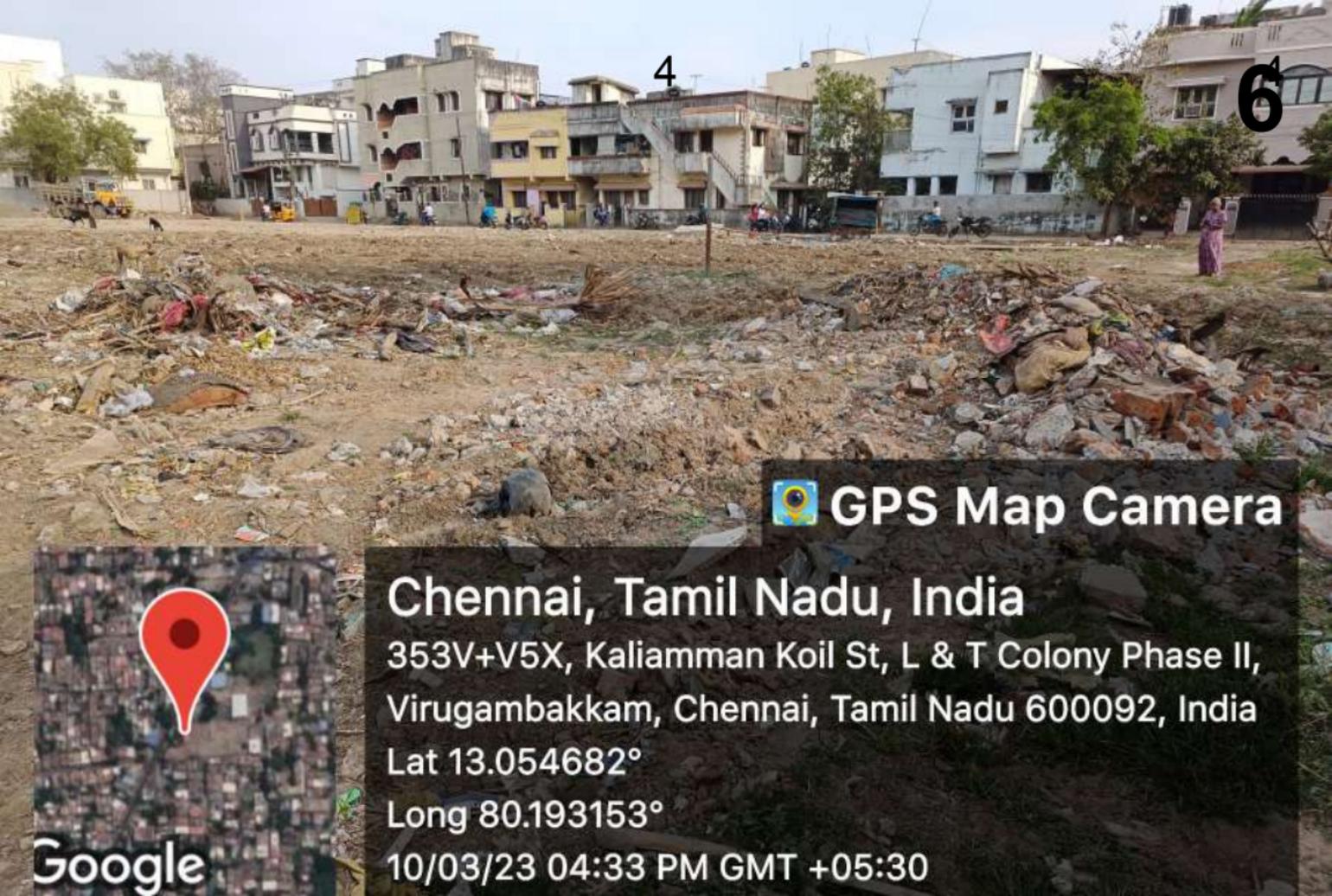
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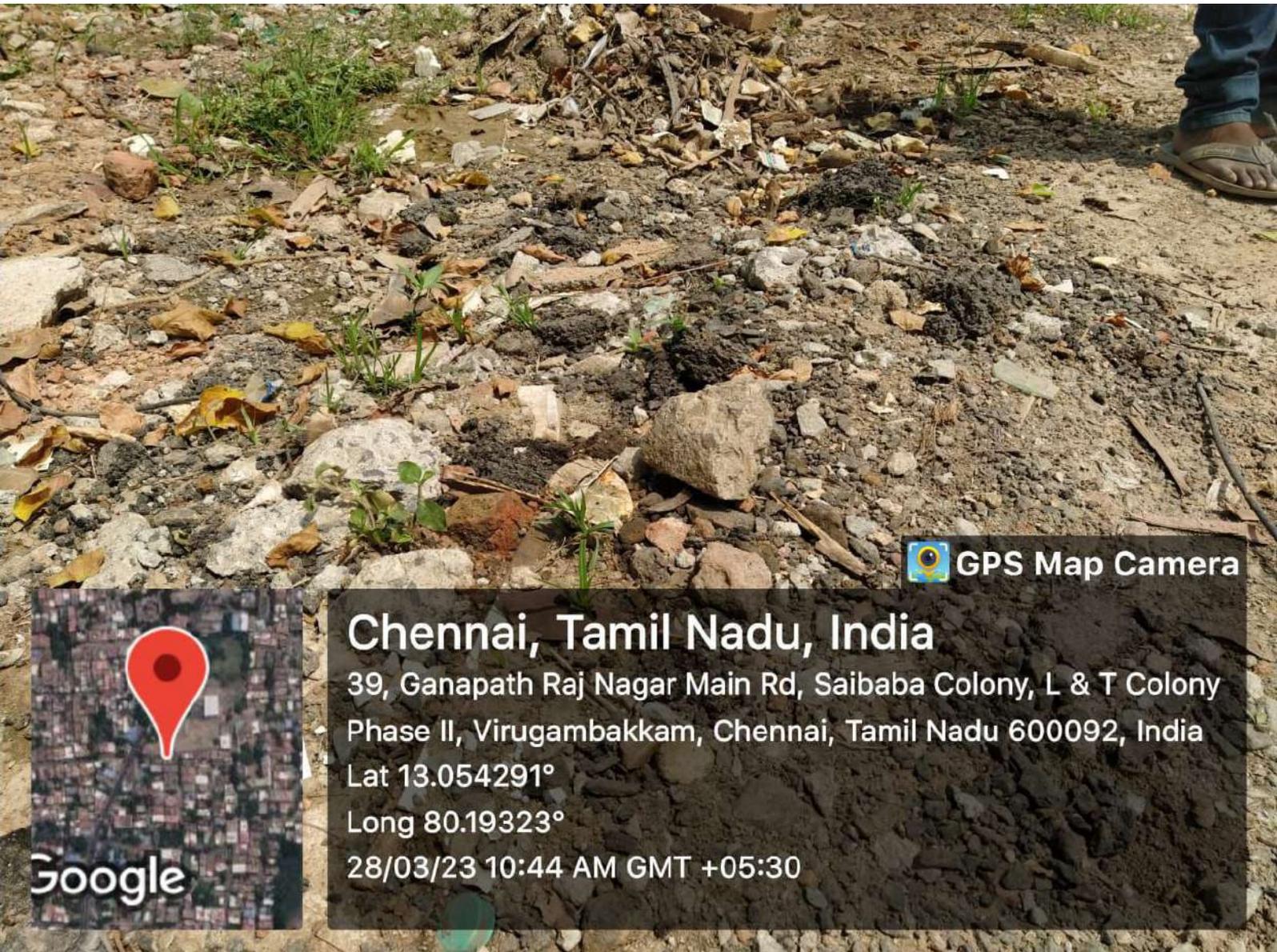
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 GPS Map Camera

Chennai, Tamil Nadu, India

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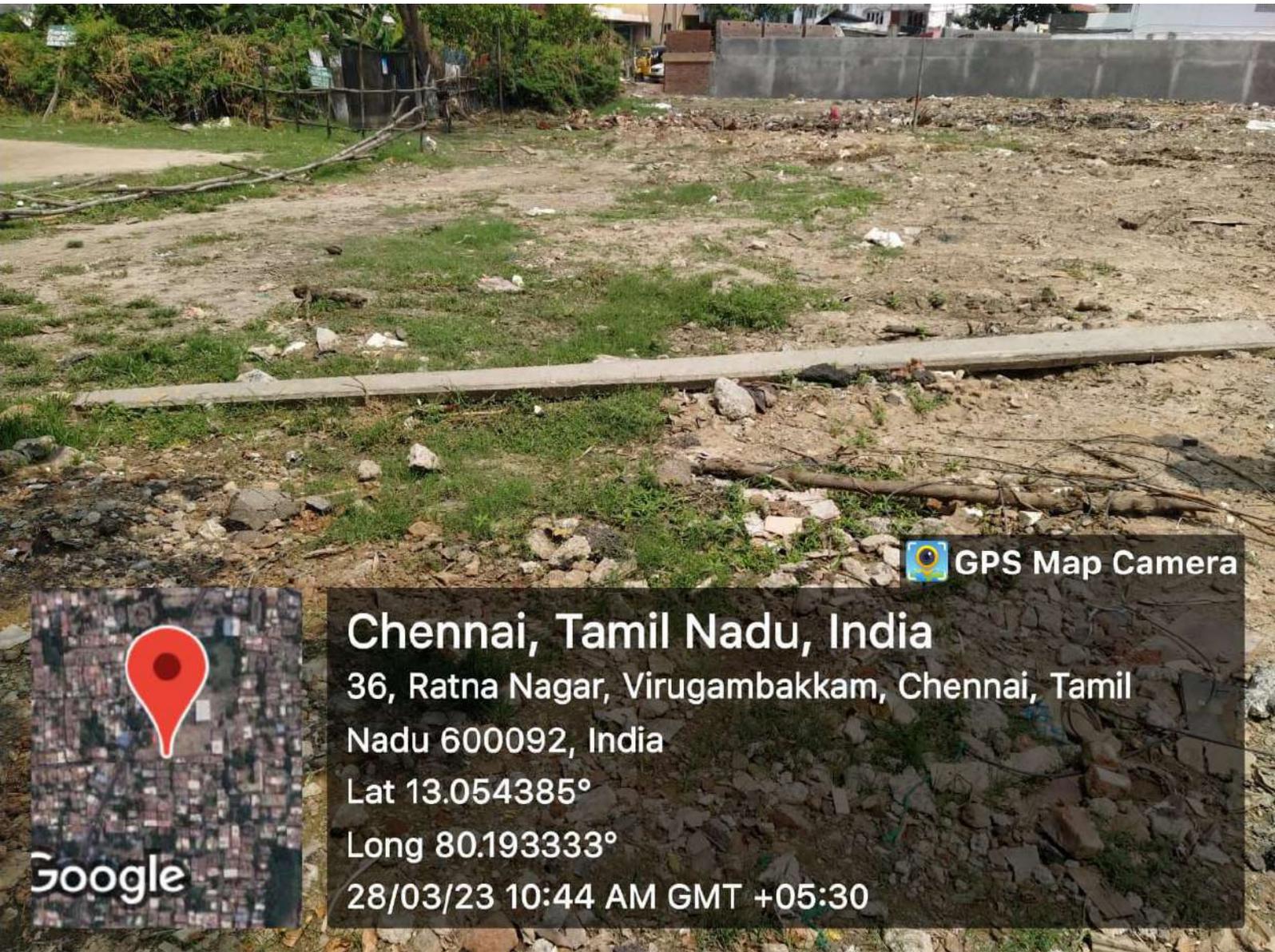
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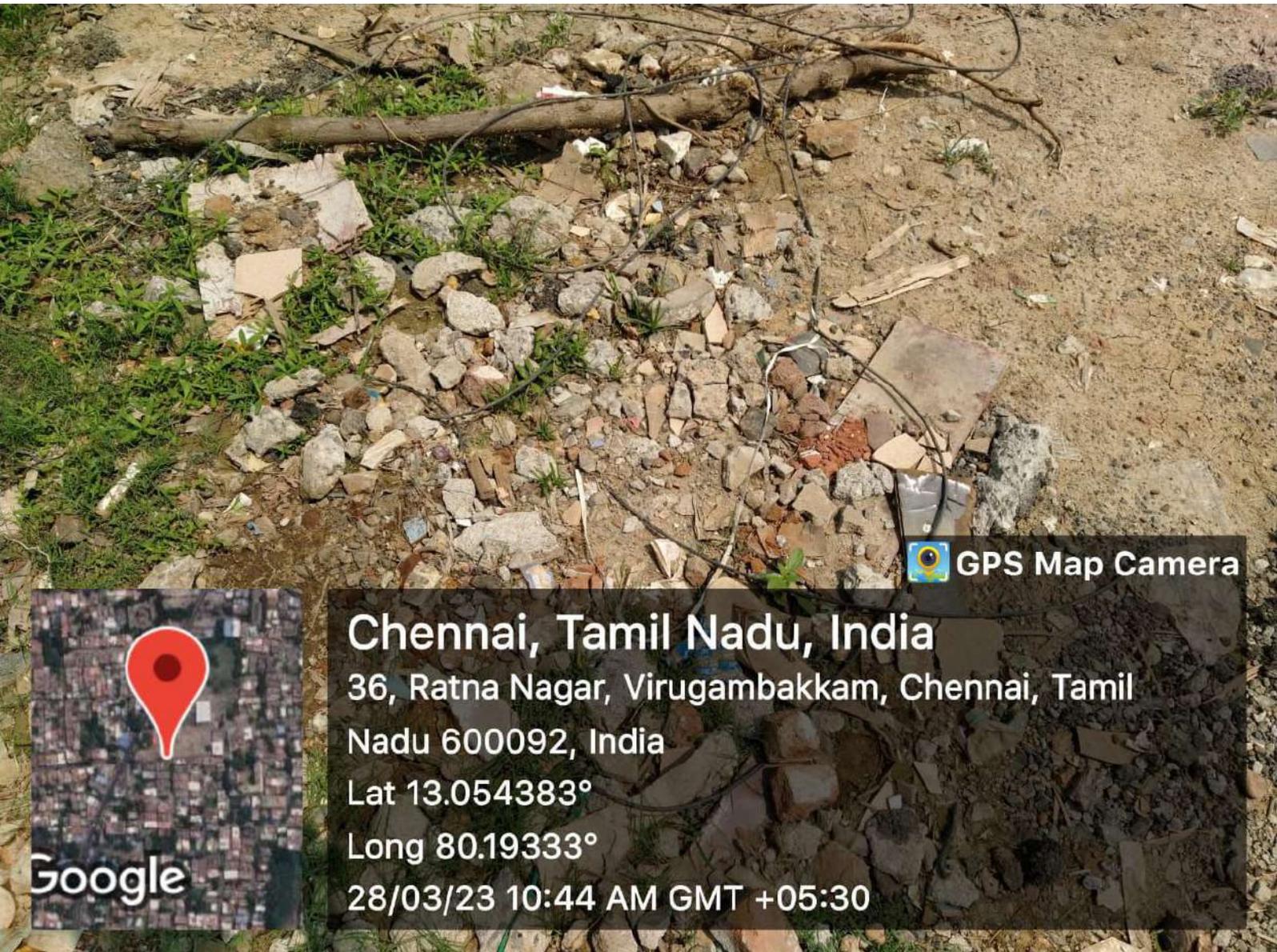
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 GPS Map Camera

Chennai, Tamil Nadu, India

36, Ratna Nagar, Virugambakkam, Chennai, Tamil Nadu 600092, India

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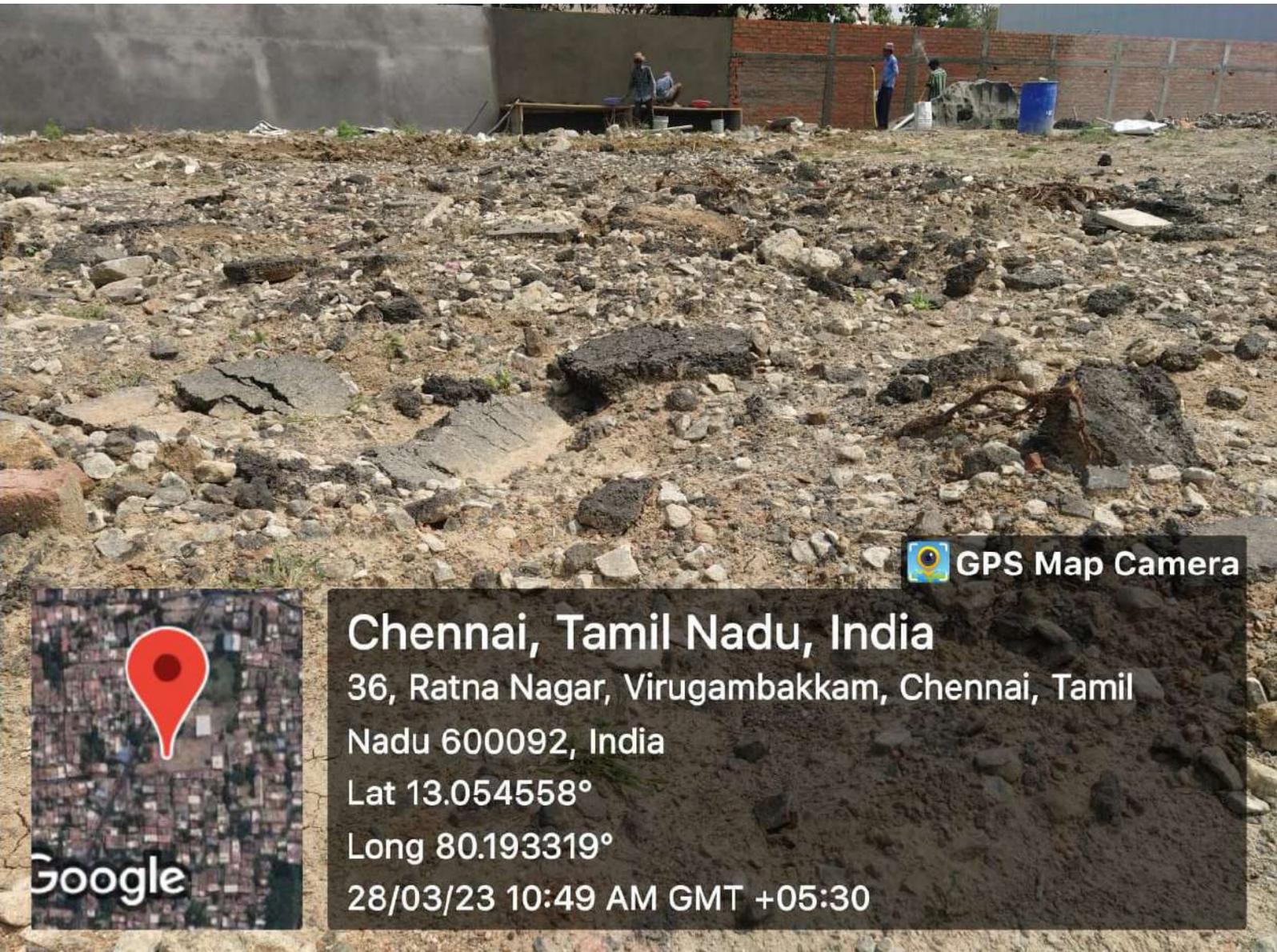
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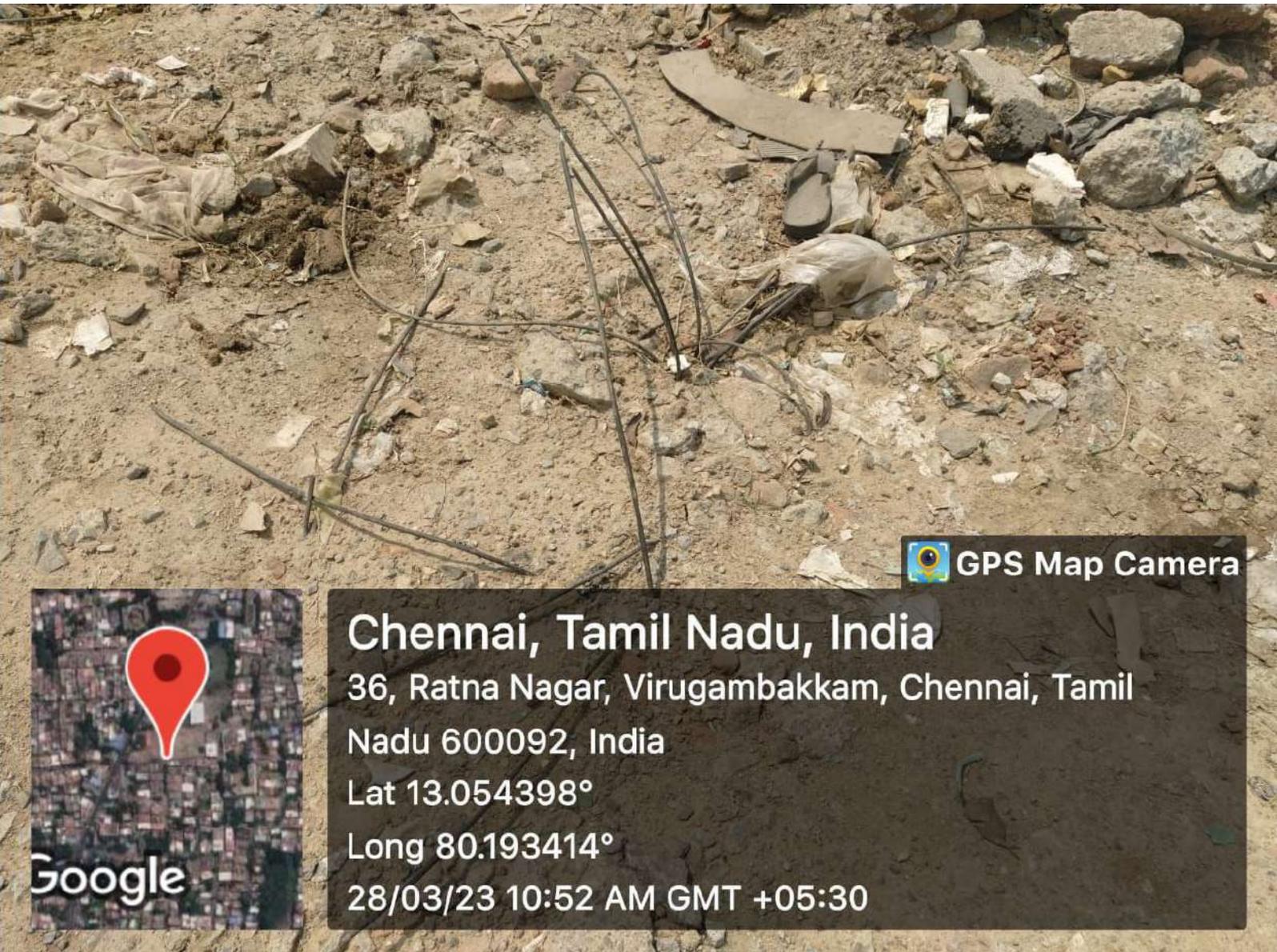
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 GPS Map Camera







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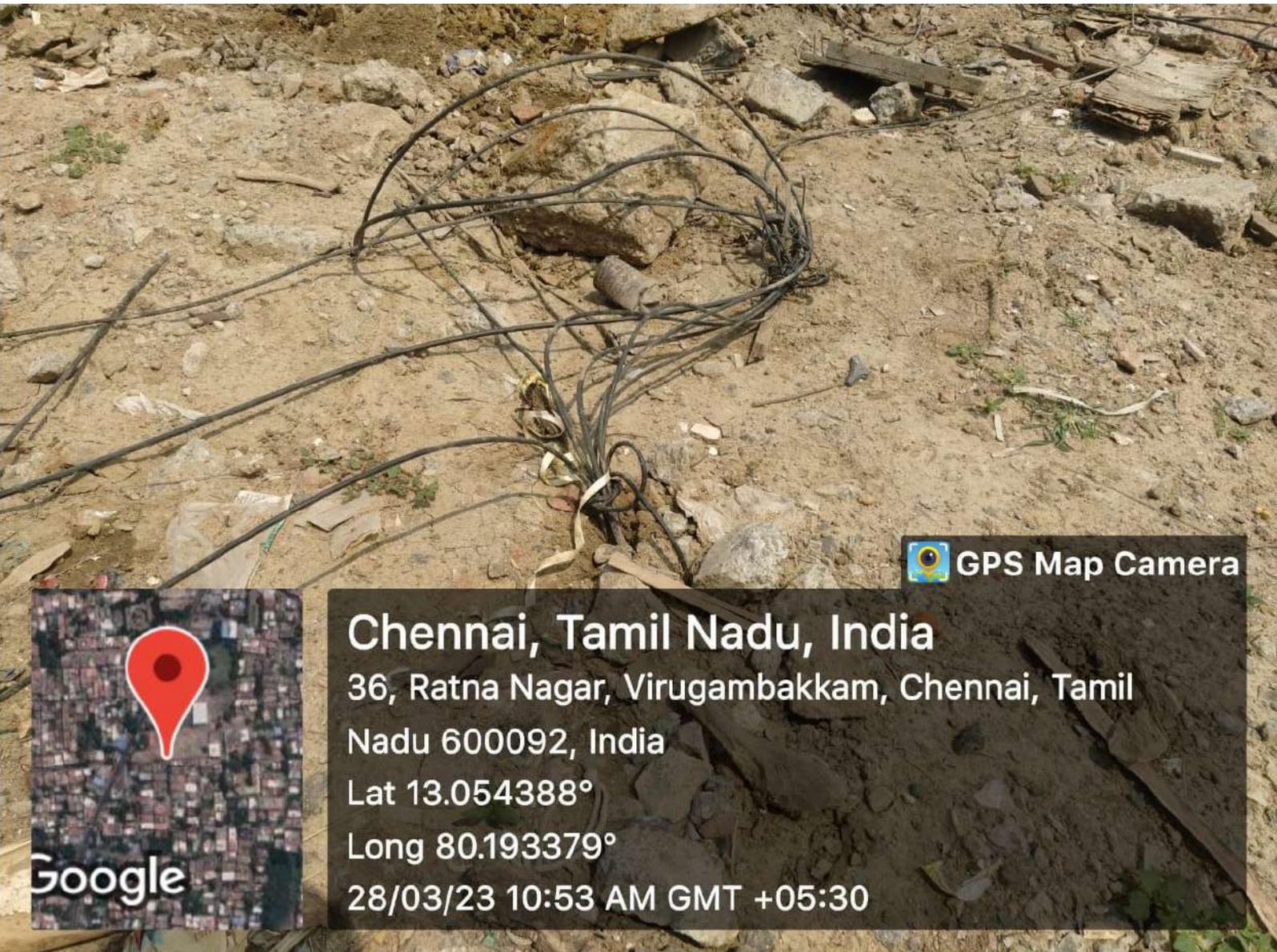
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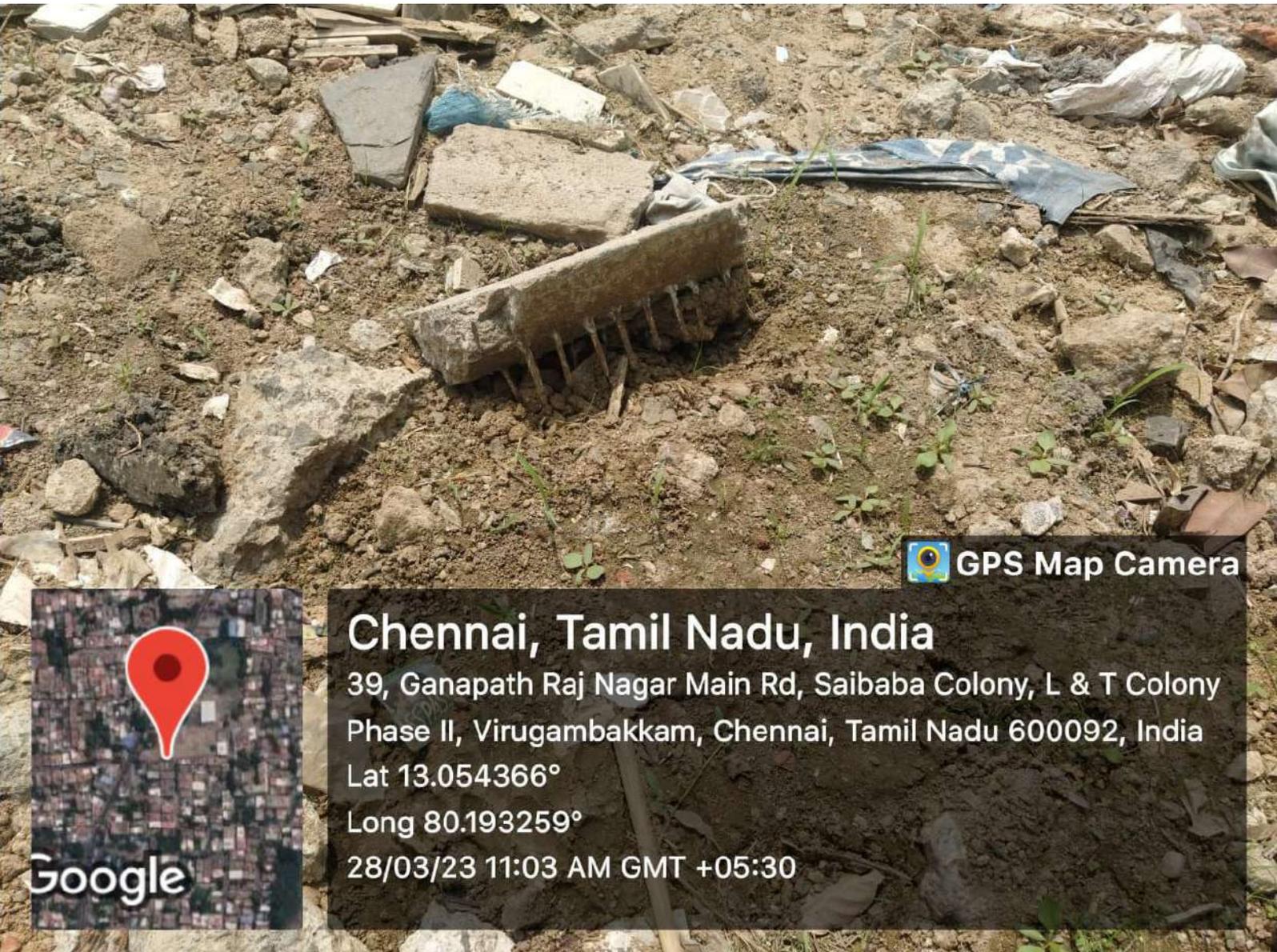
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 GPS Map Camera

Chennai, Tamil Nadu, India

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Phase II, Virugambakkam, Chennai, Tamil Nadu 600092, India

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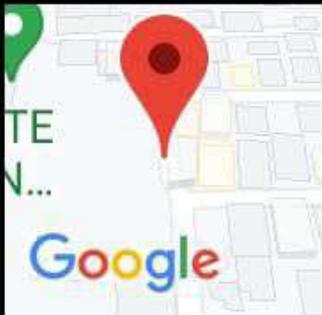
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38/3, First Floor, Salim
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Saibaba colony link

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clouds

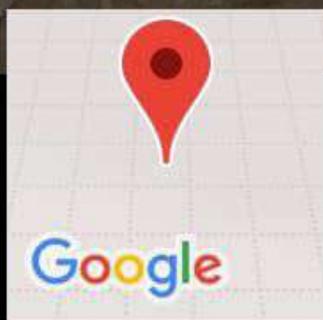
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Saibaba Colony, L

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