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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**

**SOUTHERN ZONE, CHENNAI**

**IN**

**Application No: 124 of 2023**

1. K.Geetha Subramanian,  
Door No.6, Maruthai Avenue,  
Ranjith Road, Kotturpuram,  
Chennai – 600 085.

...Applicant

**Vs**

1. Chief Secretary  
Government of Tamil Nadu,  
Chennai and 12 others

...Respondents

**COUNTER AFFIDAVIT SUBMITTED BY GREATER CHENNAI  
CORPORATION IN O.A.NO. : 124 OF 2023 -7<sup>th</sup> RESPONDENT**

I, B.R.Saravanamoorthy, son of Mr. T.Rangappan, Hindu, aged about 59 years, the Zonal Officer (i/c), Zone-XIII, Greater Chennai Corporation, having office at No.115, Dr.Muthulakshmi Salai, Adyar, Chennai-600 020, do hereby solemnly affirm and sincerely submit as follow:

1. I am the Zonal Officer (i/c), Zone-XIII, Greater Chennai Corporation representing on behalf of 7<sup>th</sup> respondent and as such I am well acquainted with the facts and circumstance of the case.

2. I respectfully submit that Tmt. Geetha Subramaniam residing at Door No.6,Maruthai Avenue, Ranjith Road, Kotturpuram, Chennai-600 085. filed an application before the National Green Tribunal Vide OA. No.124 of 2023 with the prayer to direct the Chief Secretary, Government of Tamil Nadu and 12 others to direct the concerned officers to evict the illegal encroachments to evacuate squatters on Adyar River Poramboke (nearby Maruthai Avenue, Ranjith Road, Kotturpuram, Chennai-

  
**ZONAL OFFICER  
ZONE - 13  
GREATER CHENNAI CORPORATION**

600 085) as per the G.O(Ms) No.540 revenue [(Id-6(2)) department dated 4<sup>th</sup> December 2014, and direction by the Hon'ble Madras High Court in WP 13648 of 2016 and further to take steps to restore the water course Poramboke land from illegal encroachment.

3. It is submitted that Government of Tamil Nadu had already established a trust called Chennai River Restoration Trust (CRRT) to rejuvenate all the rivers and water bodies in order to ensure free flow of water and to avoid inundation of areas due to flood.

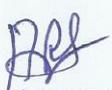
4. It is also submitted that Chennai River Restoration Trust had also taken up Adyar river Eco - Restoration project and consultant were appointed and the detailed project report was finalised by the Chennai River Restoration Trust for rejuvenating the Adyar river from origin to confluence point.

5. It is submitted that due to heavy rain and floods in Chennai during month of November and December 2015 the slum families encroached along the banks of Adyar River those who were lost their belongings were started for moving from the banks of Adyar River to the Tenements in resettlement scheme of Tamil Nadu Urban Habitat Development Board.

6. It is submitted that Water Resource Department and Revenue Department, Chennai District had identified 9539 slum families of encroachers along the banks of Adyar River in which Greater Chennai Corporation had under taken Biometric survey of enumeration of encroached families in coordination and identification from Water Resource Department, Revenue Department, Chennai District and Tamil Nadu Urban Habitat Development Board.

7. It is submitted that out of 9539 project affected families totally identified, So far 4711 project affected families within the Adyar River

SECRETARY  
CHENNAI DISTRICT  
REVENUE DEPARTMENT

  
ZONAL OFFICER  
ZONE - 13  
GREATER CHENNAI CORPORATION

boundary been relocated from 19 habitation in which Greater Chennai Corporation organised for transportation and food facilities after getting allotment orders from Tamil Nadu Urban Habitat Development Board.

8. It is submitted that Petitioner made a complaint on unauthorised structure constructed on the banks of Adyar River is situated at Adyar River Poramboke land of Water Resource Department.

9. It is submitted that Divisional Assistant Engineer, Division - 170, Zone-13, Greater Chennai Corporation was found that unauthorised development at banks of Adyar River during routine inspection on 29.05.2023. It is also submitted that letter was addressed to Assistant Engineer, Adyar Irrigation, St.Thomas Mount, Chennai to evict the encroachment on Adyar River vide Lr.No:Z.O.13.A.E.170/C.No:013/2023, Dt: 01.06.2023 since the land belongs to Water Resource Department.

10. It is submitted that Water Resource Department to remove the encroachment in the water bodies under the due process of law in terms of the Tamil Nadu land Encroachment Act, 1905 and the Tamil Nadu Protection of Tank and Eviction of encroachment Act, 2007.

11. It is also submitted that Special Secretary to Government, Water Resource Department and the District Collector, Chennai District were requested by Additional Chief Secretary/Commissioner, Greater Chennai Corporation vide Lr.No.Z.O.13.C.No:C1/8118/2023, Dt:10.10.2023 to depute their officials to commence and complete the demarking of boundaries of entire Adyar River for identification of actual project affected families & encroachment and Topo numbering as early as per High court direction.

12. It is submitted that entire water bodies of Adyar River under control of Water Resource Department hence the Greater Chennai

  
**ZONAL OFFICER**  
**ZONE - 13**  
**GREATER CHENNAI CORPORATION**

Corporation is formal party in this petition and will coordinate with concerned departments for eviction process.

It is therefore respectfully prayed that their Hon'ble Tribunal to be pleased to pass such other further order or orders as this Tribunal may deem fit and proper in the circumstance of the case.

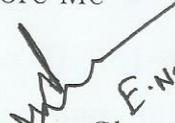
  
COUNSEL FOR 7<sup>TH</sup> RESPONDENT

Solemnly affirm that Chennai ( )

On this the 6<sup>th</sup> day of February 2024 ( )

And signed his name in my presence ( )

  
ZONAL OFFICER  
ZONE - 13  
GREATER CHENNAI CORPORATION  
Before Me

  
Advocate:: Chennai  
E.NO. 340/96

(5)

BEFORE THE HON'BLE  
NATIONAL  
GREEN TRIBUNAL  
SOUTHERN ZONE,  
CHENNAI

Original Application  
No. 124 of 2023

Counter affidavit submitted

K.Geetha Subramanian,  
Door No.6, Maruthai Avenue,  
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Chief Secretary  
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COUNSEL FOR RESPONDENT