

**IN THE NATIONAL GREEN TRIBUNAL (SOUTH ZONE),
CHENNAI**

Original Application No. 128 of 2021 (SZ)

Between:

Ibrahim Karim

.....Applicant

V.

State of Kerala & Ors

.... Respondents

MEMO FILED BY THE COUNSEL FOR THE APPLICANT

I am hereby attaching the photographs filed on behalf of the Applicant in the above Original Application for the ease of comprehension of the issue involved before this Hon'ble Tribunal. This photograph was taken during my last visit at the site.

In addition to the same, a route map and demographics sheet indicating the routes taken by Sabarimala Devotees across the Country is produced along with this Memo. A perusal of the same would reveal that Devotees don't touch Ranni Town, at all, on their way to Sabarimala. Devotees can only come from the North, East and South direction.

Route for Devotees who comes from the North Direction

Chengannur Railway Station is the nearest Railway Station to Sabarimala. From there, they take their trip to Sabarimala through National Highway 183A to enter State Highway 67 and reach Nilackal Base Camp and then to Pampa, which is the present hub of Devotees. Entire trip distance is 88.4 Kilometers. The Road does not touch Ranni, at all.

Those who comes from North and alight at **Kottayam Railway Station** through Train could travel through State Highway 8 and touch Erumely and then enter National Higway 183A and cross over to State Highway 67 and reach Nilackal Base Camp and then to Pampa, which is the present hub of Devotees. Entire trip distance is 97.7 Kilometers. The Road does not touch Ranni, at all.

Route for Devotees who comes from the Eastern Direction

Those coming **from Tamilnadu (East)** through Bus could enter Kerala from Cumbum through National Highway 183 to National Highway 183A and touch Kumily, Mundakkayam and then enter State Highway 67 and reach Nilackal

Base Camp and then to Pampa, which is the present hub of Devotees. Entire trip distance is 130 Kilometers. The Road does not touch Ranni, at all.

Route for Devotees who comes from the South Direction

Those coming from Southern Direction would either opt to National Highway 183 or National Highway 744 or State Highway 8. The main towns enroute would, according to the respective roads be Kottarakkara, Adoor, Pathanamthitta, Chittar through which any person could enter State Highway 67 and reach Nilackal Base Camp and then to Pampa, which is the present hub of Devotees. Entire trip distance would be at best 164 Kilometers. The Road does not touch Ranni, at all.

None of the routes touch Ranni Town. Then, knowing all these; the Government has splurged money and destroyed ecology by attempting to construct an unnecessary building with ulterior motives of corruption in mind.

As far as **pilgrims of Sabarimala are concerned, their base camps are at Nilackal and Pamba.** The facilities of Nilackal and Pamba are showcased along with this Memo.

The Government of Kerala is misusing the name of Ayyappa Swami in order to justify and advance their illegalities and environmental destruction.

A stream has been systematically destroyed by who ought to have protected (Government) the same. Then the miscreant justifies the destruction of the environment by misusing the name of the real protector (Ayyappa Swami). This is condemnable.

Dated this the 2nd day of March, 2023



Counsel for the Applicant

EXISTING FACILITIES AT PAMBA

The multistoried pilgrim complex is located adjacent to Nadapanthal. There are a few pilgrim shed on the northern side of Pandythavalam and beyond Pandythavalam.

There is a Government hospital and Ayurvedic Hospital functioning during festival seasons on the south eastern side near the Nadapanthal.

Near Malikappuram temple complex there is a dispensary run by NSS. Near the Donor Complex there is a telephone exchange and public hall office with STD facilities.

Guest House	Accommodation – Name of building	No.of rooms
PALAZHI (DH I)	Pilgrim Centre – I	134
SOPANAM (DH II)	Pilgrim Centre – II	111
MANIKANTAN (DH III)	Pilgrim Centre – III	139
CHINMUDRA (DH IV)	Donor House No.-I	24
SIVASAKTHI (DH V)	Donor House No.-II	24
TEJASWINI (DH VI)	Donor House No.-III	24
SREEMATHA (DH VII)	Donor House No.IV	24
PRANAVAM (PC I)	Donor House No.V	19
SAHYADRI (PC II)	Donor House No.VI & VII	24

KAILAS (PC III)	Maramath Complex	22
GKD Hall	Sabari Nivas Guest House	64
Poorna, Pushkala Hall	Pamba Guest House	16
Sabari Guest House2 bed3 bed4 bed	Cottages (5)	51
Forest IB Sabarimala	Poorna Pushkala Hall	1
Forest Dormitory	Malikappuram Building	16





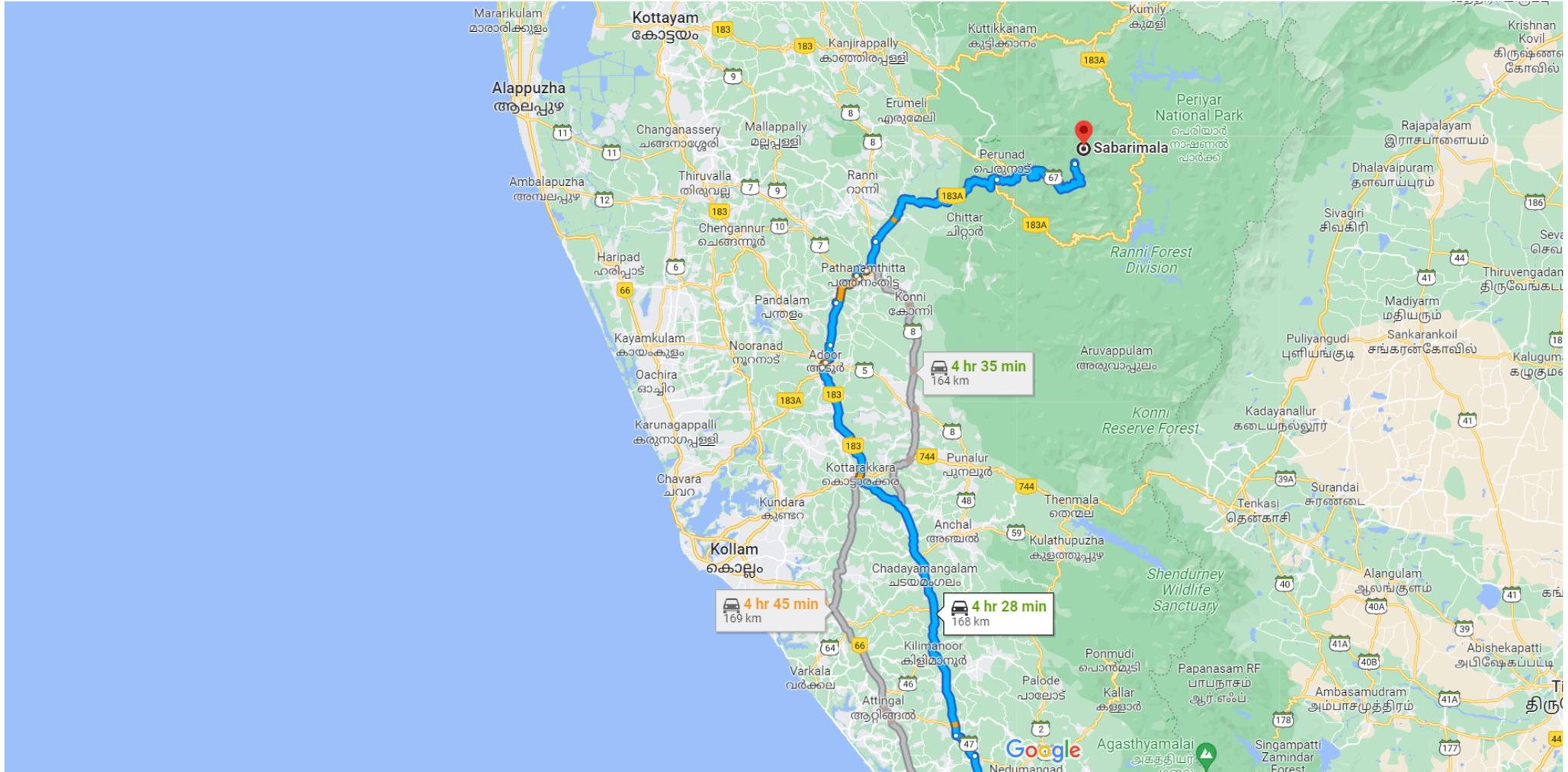




Thiruvananthapuram, Kerala to Sabarimala, Kerala

Drive 168 km, 4 hr 28 min

Those coming from Souther Direction would either opt to National Highway 183 or National Highway 744 or State Highway 8. The main towns enroute would, according to the respective roads be Kottarakkara, Adoor, Pathanamthitta, Chittar through which any person could enter State Highway 67 and reach Nilackal Base Camp and then to Pampa, which is the present hub of Devotees. Entire trip distance would be at best 164 Kilometers. The Roads does not touch Ranni, at all.



Map data ©2023 10 km

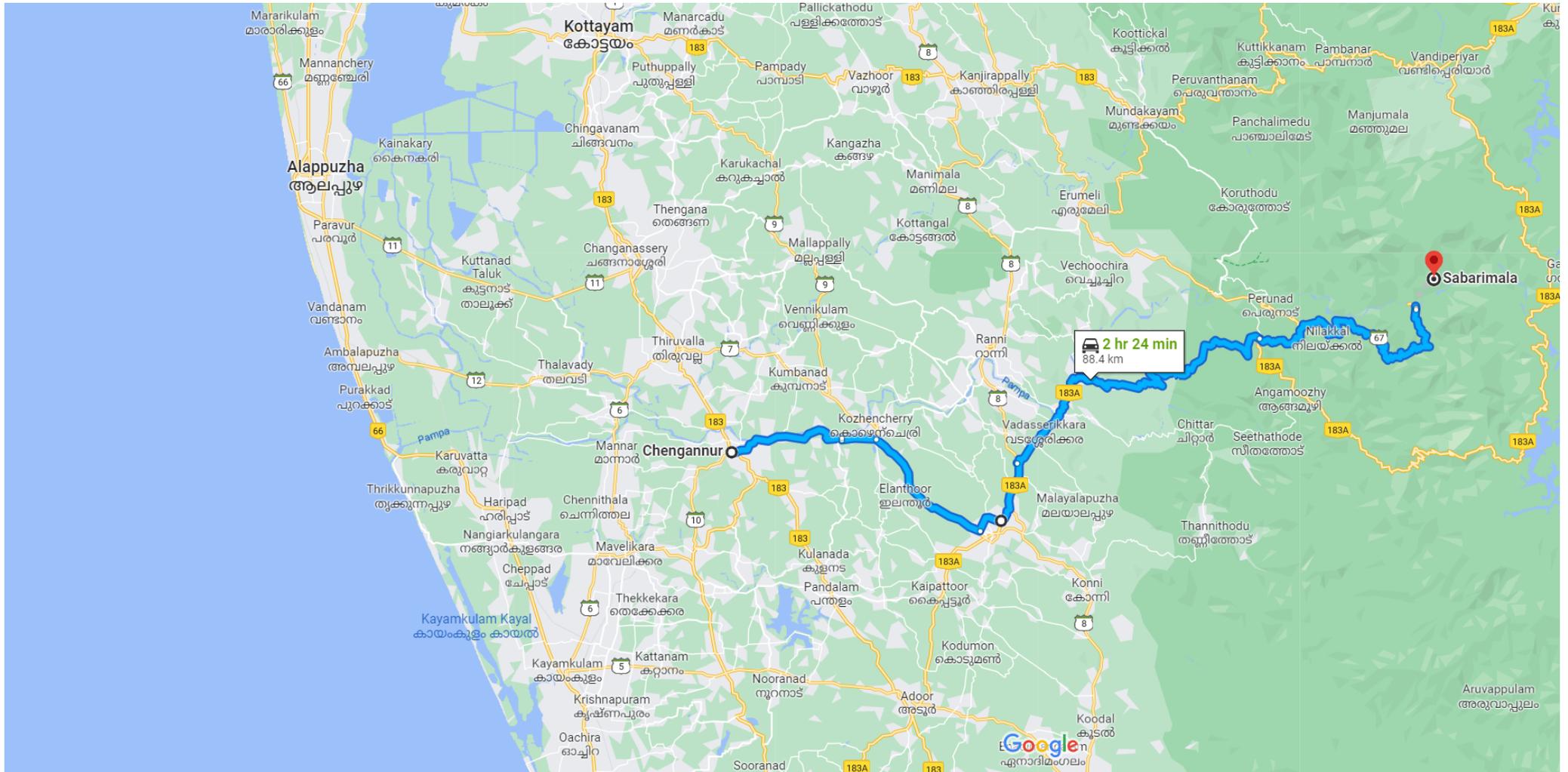
 **via MC Rd and NH 183A** **4 hr 28 min**
 Fastest route now due to traffic conditions 168 km



Chengannur, Kerala to Sabarimala, Kerala

Drive 88.4 km, 2 hr 24 min

Chengannur Railway Station is the nearest Railway Station to Sabarimala. From there, they take their trip to Sabarimala through National Highway 183A to enter State Highway 67 and reach Nilackal Base Camp and then to Pampa, which is the present hub of Devotees. Entire trip distance is 88.4 Kilometers. The Road does not touch Ranni, at all.



Map data ©2023 5 km

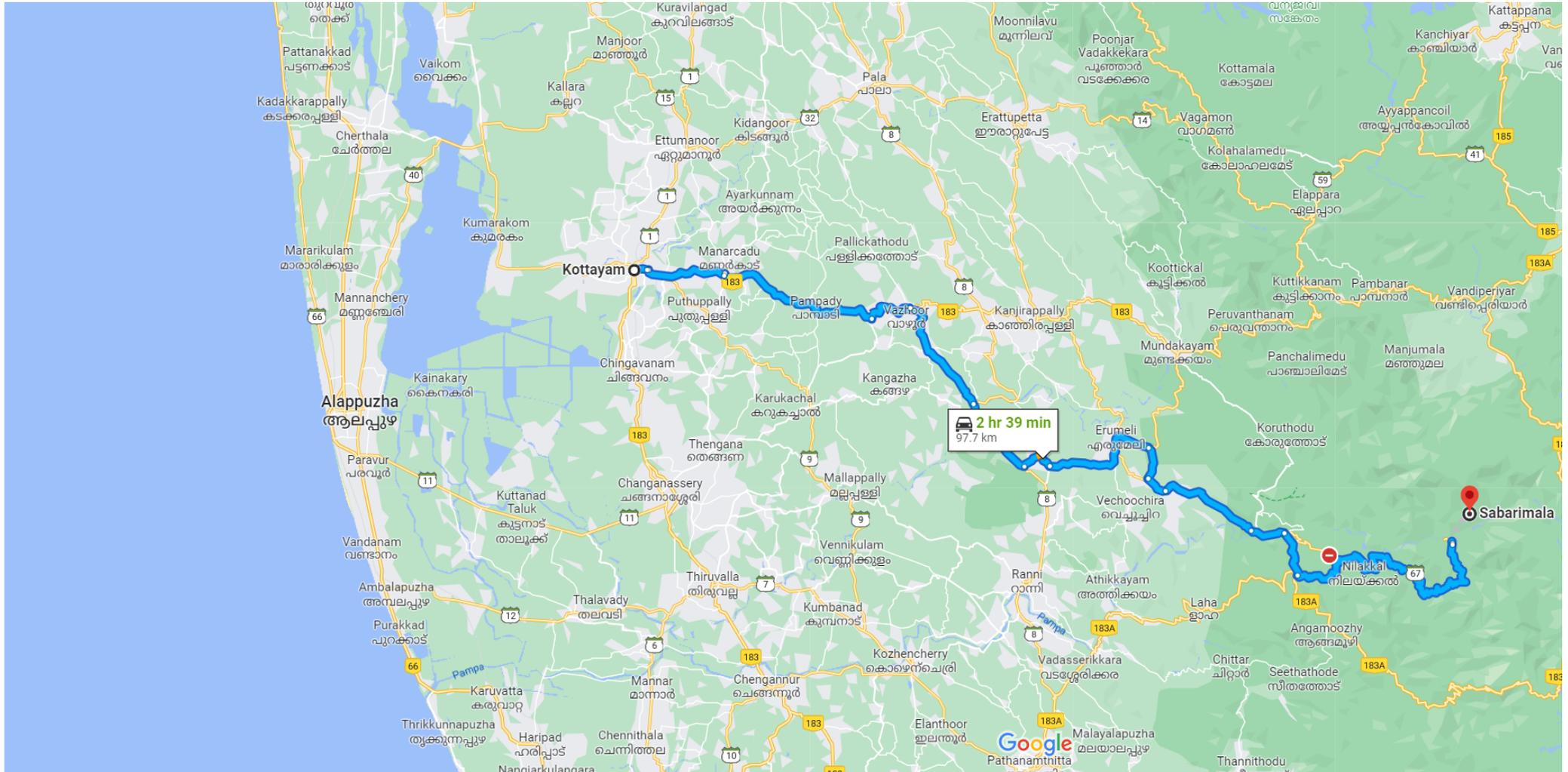

via NH 183A and Mannarkulanji-Pampa Rd
2 hr 24 min
88.4 km
 2 hr 14 min without traffic



Kottayam, Kerala to Sabarimala, Kerala

Drive 97.7 km, 2 hr 39 min

Those who comes from North and alight at Kottayam Railway Station through Train could travel through State Highway 8 and touch Erumely and then enter National Higway 183A and cross over to State Highway 67 and reach Nilackal Base Camp and then to Pampa, which is the present hub of Devotees. Entire trip distance is 97.7 Kilometers. The Road does not touch Ranni, at all.



Map data ©2023 5 km

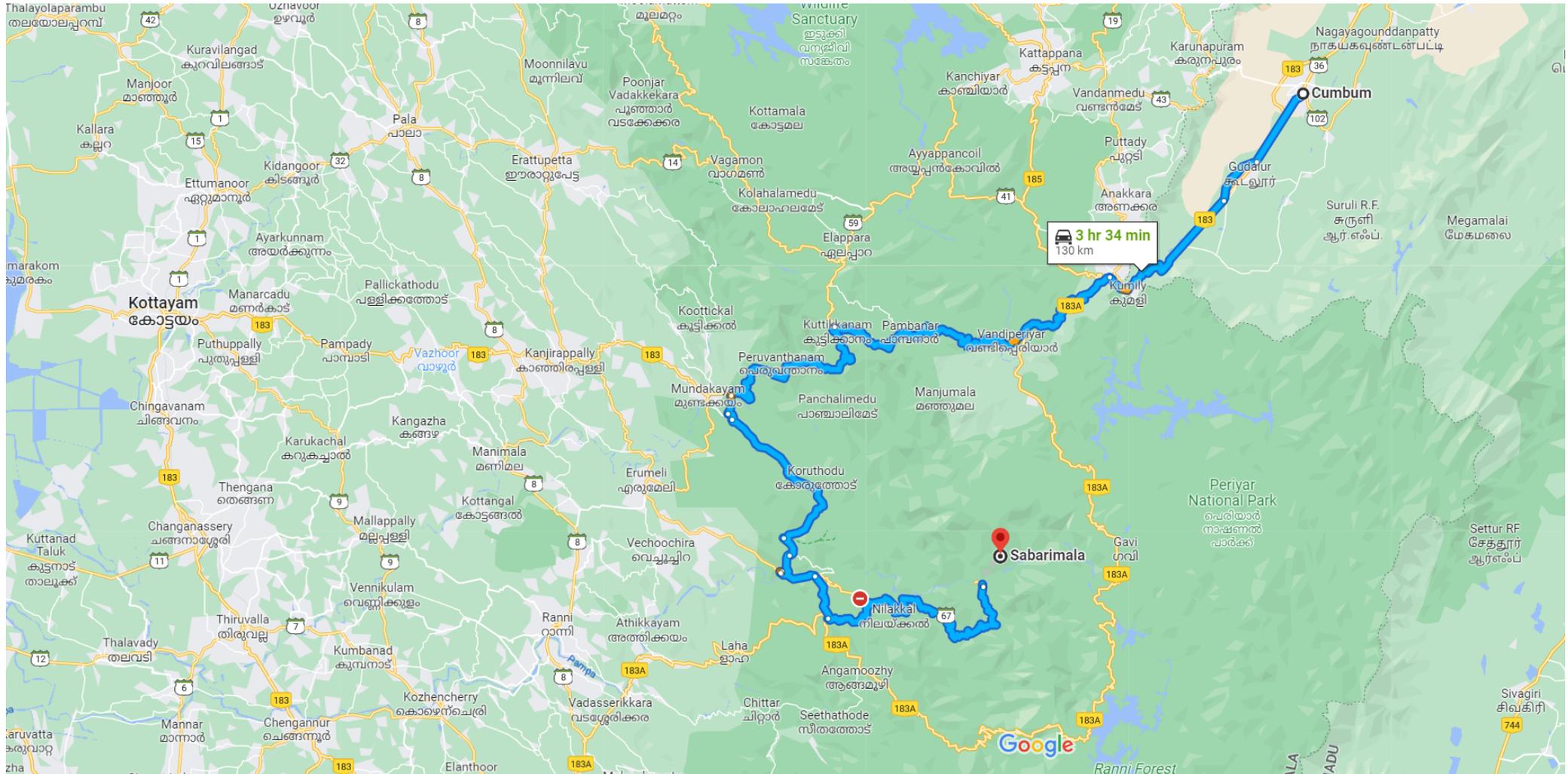
 via NH183 and Mannarkulanji- 2 hr 39 min
Pampa Rd 97.7 km



Cumbum, Tamil Nadu to Sabarimala, Kerala

Drive 130 km, 3 hr 34 min

Those coming from Tamilnadu through Bus could enter Kerala from Cumbum through National Highway 183 to National Highway 183A and touch Kumily, Mundakkayam and then enter State Highway 67 and reach Nilackal Base Camp and then to Pampa, which is the present hub of Devotees. Entire trip distance is 130 Kilometers. The Road does not touch Ranni, at all



Map data ©2023 5 km

via NH183 **3 hr 34 min**
 Fastest route now, avoids road closure 130 km