

**BEFORE THE HON' BLE NATIONAL GREEN TRIBUNAL (SZ) AT CHENNAI**

**APPEAL NO.149 OF 2022**

SHANKARAN

Appellant

VS

State Of Kerala And 8 others

Respondents

**REPLY FILED BY THE 4<sup>th</sup> RESPONDENT ON BEHALF OF VANIAMKULAM  
GRAMA PANCHAYATH**

I, Vinod A.K, 52 Years, S/o Kunjukuttan, Edheevaram, Kanniyampuram (P.O), Ottappalam, working as Secretary, Vaniyamkulam Grama Panchayath, Vaniyamkulam, Palakkad District, Kerala do hereby solemnly affirm and declare as under: That I, in the capacity of Secretary, Vaniyamkulam Grama Panchayath, Vaniyamkulam, Palakkad District, Kerala (hereinafter referred as the 4<sup>th</sup> Respondent) I, am fully conversant with the facts of the case and hence, competent to swear this reply on behalf of Respondent No. 4.

The 4<sup>th</sup> Respondent states as follows –

1. The 4<sup>th</sup> Respondent denies all the allegations, averments and statements contained in Appeal No.149 of 2022 as false and incorrect, save those that are specifically admitted herein.
2. It is respectfully submitted that , it is true that one quarry of the Kalpaka metal crushers is lying in Sy No. 1/7 of Vaniyamkulam – 1 village is within the jurisdiction of the 4<sup>th</sup> respondent .



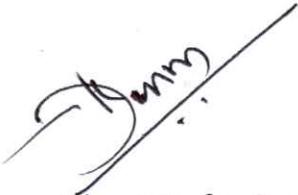
**VINOD A. K  
SECRETARY**

3. The Respondent No. 4 submits that there are 2 granite quarries and metal crusher units ( M/s. Kalpaka Metal Crushers and M/s. Blue chip Mines and industries) operated by respondents No. 8 and 9 , Only one quarry of the Kalpaka metal crushers is located and within the jurisdiction of the 4<sup>th</sup> respondent . Their own metal crusher unit, quarry and metal crusher units of Blue chip mines and industries are located in Chalavara Grama Panchayath area which comes under Chalavara Panchayath is within the jurisdiction of the 3<sup>rd</sup> respondent and is not under the jurisdiction of the 4<sup>th</sup> respondent .
4. The Respondent No. 4 submits that the agricultural land mentioned by the applicant in the application having an extent of about 2.5 acres comprised in Sy No. 454/1 , 437/4 , 424/7 and 432/5 .( 124/6 , 124/7 , 124/8 ) of Chalavara Village in Ottappalam Taluk, Palakkad District, Kerala is situated in Chalavara Grama Panchayath and comes under the jurisdiction and limits of the 3<sup>rd</sup> Respondent and not within the jurisdiction of the 4<sup>th</sup> Respondent .
5. The respondent No. 4 submits that On site inspection of the said quarry and agricultural land , it was seen that quarry was not operating and none of the effluent from the quarry located in the Vaniyamkulam Grama Panchayath area (which is within the jurisdiction the 4<sup>th</sup> respondent ) had flowed to the place mentioned by the applicant in his said application and there is no possibility of it .
6. The Respondent No. 4 submits that upon perusal of documents at the initial stage and all other departments have given no objection , the 4<sup>th</sup> respondent sanctioned quarry license to M/s. Kalpaka metal crushes .



VINOD A. K  
SECRETARY

That in light of the above submissions, it is respectfully prayed that this Answering Respondent No. 4 ie. Vaniyamkulam Grama Panchayath shall abide by any order or directions passed by this Hon'ble Tribunal.



Advocate for Respondent No. 4

**K. SUJITH KUMAR**  
ADVOCATE, K/134/2006  
OTTAPALAM  
Mob: 9447944149  
9961976954



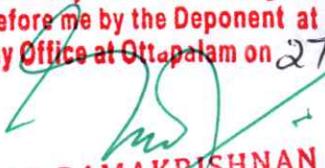
Respondent No. 4

**VINOD A. K**  
SECRETARY  
VANIYAMKULAM GRAMA PANCHAYATH

#### VERIFICATION

Verified at Ottapalam on this 27<sup>th</sup> day of March, 2023 that the contents of the above Reply are true and correct to the best of my knowledge and belief and nothing has been concealed therein.

Solemnly affirmed and signed  
before me by the Deponent at  
my Office at Ottapalam on 27/03/2023



**P.R. RAMAKRISHNAN**  
ADVOCATE & NOTARY  
Reg. No. 9170  
Palakkad Dist., Breeze Complex  
RS Road, Ottapalam-679 101  
Mob: 9447836703



Respondent No. 4

**VINOD A. K**  
SECRETARY  
VANIYAMKULAM GRAMA PANCHAYATH



NOTARY  
PR SAMAKRISHNAN  
Palakkad District  
Reg. No. 8170  
Exp. Date: 25-11-2026  
GOVT. OF INDIA

NOTARY  
PR SAMAKRISHNAN  
Palakkad District  
Reg. No. 8170  
Exp. Date: 25-11-2026  
GOVT. OF INDIA

INDIA  
NOTARIAL  
FIVE RUPEES

NOTARY  
PR SAMAKRISHNAN  
Palakkad District  
Reg. No. 8170  
Exp. Date: 25-11-2026  
GOVT. OF INDIA

**Filed on: 28 - 03-2023**

Hg on: 29-03-2023

**BEFORE THE NATIONAL GREEN  
TRIBUNAL , (SZ) SITTING AT  
CHENNAI**

**Original Application No. 149 of 2022 (SZ)**

**Applicant**

**Shankaran**

**Respondents**

**State of Kerala and others**

**REPLY FILED BY THE 4<sup>TH</sup> RESPONDENT**

**Counsel for 4<sup>th</sup> Respondent**

**K. Sujith Kumar K/134/2006**

**Binith . A MS 4624/2021**

**V. Sriram MS 2647/2021**

**[advbinith@gmail.com](mailto:advbinith@gmail.com)**

**8939890222**

3/28/23, 9:17 AM

Gmail - reply filed by the 4th respondent in OA 149 of 2022 . before the NGT SZ chennai.



binith haridas <advbinith@gmail.com>

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**reply filed by the 4th respondent in OA 149 of 2022 . before the NGT SZ chennai.**

1 message

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binith haridas <advbinith@gmail.com>

Tue, Mar 28, 2023 at 9:16 AM

To: envt.dir@kerala.gov.in, "dcpkd.ker@nic.in" <dcpkd.ker@nic.in>, "ddpchalavarapkd@gmail.com" <ddpchalavarapkd@gmail.com>, go.pal.dmg@keralagov.in, director.dir.dmg@kerala.gov.in, chn.kspcb@gov.in, "thomasbluechips@gmail.com" <thomasbluechips@gmail.com>, "kalpakametals@gmail.com" <kalpakametals@gmail.com>, "advashkar@gmail.com" <advashkar@gmail.com>

Sir/ Madam

I , the 4th respondent (vaniyamkulam grama panchayath rep by its secretary) in OA 149 of 22 before the national green tribunal sitting at chennai do hereby attach my reply / objection .Kindly see the attachments for details.



**R4 reply in OA 149 of 2022.pdf**

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