

BEFORE THE NATIONAL GREEN TRIBUNAL,  
EASTERN ZONE BENCH, AT KOLKATA

O.A. No. 25/2025/EZ

IN THE MATTER OF:

Hazari Dehury & Anr.

Applicant(s)

Versus

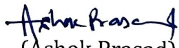
State of Odisha & Ors.

Respondent(s)

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Through :

  
(Ashok Prasad)  
Advocate,  
Counsel for U.O.I.

Place : KOLKATA

Dated : 15/9/25

BEFORE THE NATIONAL GREEN TRIBUNAL,  
EASTERN ZONE BENCH, AT KOLKATA

O.A. No. 25/2025/EZ

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Applicant(s)

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State of Odisha & Ors.

Respondent(s)

**REPLY IN REJOINDER FOR AND ON BEHALF OF THE RESPONDENT NO.11,  
FILED BY APPLICANT**

**MOST RESPECTFULLY SHEWETH:**

I, RAGHAVEBNDRA RAO aged about 50 Years, Director to the Central Council for Research in Yoga & Naturopathy (CCRYN), Government of India, under Ministry of AYUSH, 61-65, Institutional Area, Janakpuri, New Delhi-110058, do hereby solemnly affirm and declare as under: -

1. That I am well conversant with the facts and circumstances of the case, and as such, I am duly authorized and competent to swear this affidavit on behalf of CCRNY, in the above matter.



2. That I have read and understood the rejoinder and have been advised to traverse by way of this Counter Affidavit as reply thereto.
3. That have and except those which are matter of record and those which are specifically admitted hereto the contents of the rejoinder that have not been specifically admitted hereunder or are a matter of record be deemed denied.
4. That the deponent craves liberty to raise additional submission or file supplementary affidavits in case need arises during the course of arguments.

**PARA WISE REPLY:**

5. That, in reply to the averments made from Paragraph No.1 to 3 of the Rejoinder application, it is submitted that under Para 1 is the matter of record and hence, do not warrant any reply from this answering respondent. However, the required reply needs to be submitted by the respondent No.(2) to (10).
6. That, the averments made under Para 2 of the rejoinder application, it is humbly submitted that, the required reply needs to be submitted by the respondent No.(6) and (7).
7. That, the averments made under Para 3 of the rejoinder application, it is humbly submitted that though the Applicants in this OA are may not be party in the WP(PIL) No.18877/2014 but are from the same group and from the same P.O. & P.S. of Palasapur, Wamanpaur of district of

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Khorda area. In addition to this, the Applicant submitted under the prayer in the WP(PIL) No.18877/2014 is given herein below :-

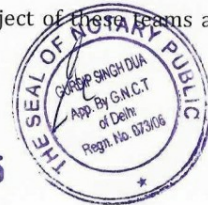
PRAYER UNDER	
WP(PIL) No.18877/2014	O.A.No.25/2025
to set aside the Order No.2074 dated 4.9.2012	to relocate the project to any other alternate sites, (ii). Hold and declare that the conservation of physical forest to Patitkisam & (iii). treat the land as deemed forest.

On bare perusal of their prayer made both in WP(PIL) No.18877/2014 and O.A.No.25/2025 is, the core idea of the applicants is to stop the ongoing establishment of Yoga & Naturopathy Hospital. Further, they have been creating obstruction and preventing the construction activities for the last 11 years. Moreover, the replying respondent had already invested almost 2 crores so far for cutting of trees, lease amount and laying of foundation stone by the Hon'ble Prime Minister of India, Sh Narendra Modi.

A copy the Order No.2074 dated 4.9.2012 issued by the then Collector, Khorda regarding de-reserved the Land in Khata 331 Plot No.133 is enclosed as **Annexure-I**.

8. That, the averment made under the Para 4 of rejoinder application, it is humbly submitted that the required reply needs to be submitted by the respondent No.(6) and (7).
9. That, the averment made under the Para 5 of rejoinder application, it is humbly submitted that the aim and object of these claims are one

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and the same to prevent the developmental activities being taken up by the Government of India as well as the State Government of Odisha.

10. That, the averment made under the Para 6 of rejoinder application, it is humbly submitted that the required reply needs to be submitted by the respondent No.(6) and (7).
11. That, the averment made under the Para 7 of rejoinder application, it is humbly submitted that the required reply needs to be submitted by the respondent No.(4), (6), (7)and (8).
12. That, the averments made under the Para 8 of rejoinder application, it is humbly submitted that the averments made by the Applicants are baseless, fabricated and ill-conceived. It is further humbly submitted that the site earmarked where the government of India had proposed setting up of 100-bed Yoga and Naturopathy hospital on Gurujanga-Chatabahar Road, there is the HUDCO industrial corridor, Chatabahar Industrial area of around 200 acres, where in several industries and government-run organizations have been set up as given below. This industrial corridor is adjacent to the 20 acres of Land allotted to CCRYN, where in locals have trespassed on the government land for cutting wood and grazing their cattle over the years. The plot lies between Bhinjagiri village and the Chatabahar industrial area, which is adjacent to and abutting the said plot (See Google map enclosed). On the east side boundary, there is (1). Vishwas Nursing College, (2). Balmer Lawrie Logistic godown, (3).Railneer water bottling plant, and on the South, (1). Veterinary Clinical Complex IVS and (2). AH Shiksh O Anusandhan University. To

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the east, the paddy fields followed by Bhinjadigiri Village, and to the north, Chatabahar- Gurijanga Road. It is pertinent to mention here that the Yoga & Naturopathy Hospital is not under the Chandaka wildlife sanctuary and there is good green coverage of the Chandaka wildlife sanctuary surrounding the industrial corridor. In addition to this, several Govt organizations, Industries, educational institutions, and prisons are already established under this industrial corridor abutting our land. Thus, it is evidently established that the petitioners want to usurp this government land and hence are making false allegations. The government land will have a state-of-the-art 100-bed Yoga and Naturopathy Hospital which will be of benefit to the public in the districts of Cuttack, Bhubaneswar and Khorda districts. Moreover the said land is for a national institute for general public and not for any profit making private enterprise. The following list of institutions which were established in the industrial hub are given herein below :-

Sl No.	Name Of Industries/ College/Govt. Offices	Distance	Direction
1	Viswas College (Chhatabar)	Adjacent	East
2	New Model Jail (Chhatabar)	800 Mtr.	East
3	Prison Academy (Chhatabar)	300 Mtr.	East
4	IDCO Industrial Area (Chhatabar)	700 Mtr	East
5	Biju Pattnaik Open Air Ashram (Chhatabar)	1.2Km	East
6	NIIS Institute of Engineering (Chhatabar)	2.6 Km	East

*R.*



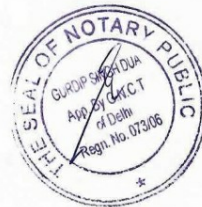
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7	Chandaka & Damapada P.R.F (Chhatarbar) (Protected Reserve Forest Boundary)	Nearest	East
8	Gurukul Institute of Technology (Jamujhari)	2 Km	East- North

On perusal of the above organizations/Institutions/Government Offices, it is clearly established that these organizations are established in and around the site earmarked for proposed Yoga & Naturopathy Hospital which has not created any sort of disturbance for Bio-system/ecological imbalance (See Google map enclosed). Hence, the averments made by the Applicant are baseless, rejected and denied.

**A copy of the industrial area site map is enclosed as Annexure-II.**

13. That, the averment made under the Para 9 of rejoinder application, it is humbly submitted that the required reply needs to be submitted by the respondent No.(6) and (7).
14. That, the averment made under the Para 10 and Para 11 of rejoinder application are matter of record. Hence, no comments to offer.
15. That, the averment made under the Para 12 of rejoinder application, it is humbly submitted that the required reply needs to be submitted by the respondent No.(10).
16. That, the averment made under the Para 13 of rejoinder application, it is humbly submitted that the required reply needs to be submitted by the respondent No.(6) and (7).



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17. That, the averment made under the Para 14 of rejoinder application, it is humbly submitted that the required reply needs to be submitted by the respondent No.(6) and (7).
18. That, the averment made under the Para 15 of rejoinder application, it is humbly submitted that the required reply needs to be submitted by the respondent No.(6) and (7).
19. That, the averment made under the Para 16 of rejoinder application, it is humbly submitted that the required reply needs to be submitted by the respondent No.(6) and (7).
20. That, the averment made under the Para 17 of rejoinder application, it is humbly submitted that the O.A filed by the Applicants may be dismissed with costs.

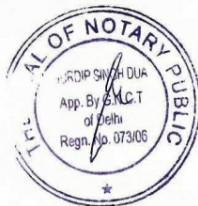
#### PRAYER

The Hon'ble National Green Tribunal is prayer to dismiss the Application with cost in the larger interest of the justice and public and allow CCRYN to go ahead with the project.

In view of the above facts indicated in earlier paras, it is respectfully prayed that this Respondent shall abide by any order or direction, passed by the Hon'ble Tribunal.



DEPONENT



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**VERIFICATION:**

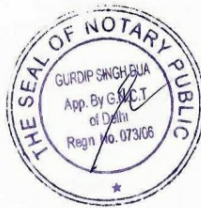
Verified at Delhi, on this the    day of September, 2025 that the contents of the above Affidavit are true and correct to my knowledge. No part of it is false and nothing material has been concealed there from.



DEPONENT

Identified by me

Advocate



ATTESTED  
NOTARY PUBLIC

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ANNEXURE R-1

Order No. 2074, Dt. 4.9.2012

Whereas, the Gochar land described in the schedule below is found to be suitable for the purpose and in excess of the reasonable requirement for the purpose for which it is reserved and to keep the Gochar land in the village as per rule.

Now, there fore, in exercise of the power conferred on me under clause (c) of Sub Section (2) of section 3-A of the Odisha Government Land Settlement Act, 1962 read with Clause (ii) of Sub Rule (1) of Rule 4 of the Odisha Government Land Settlement Rules, 1983 I, Smt Roopa Mishra, IAS, Collector and District Magistrate, Khordha do hereby de-reserve the following extent of land as scheduled below with immediate effect for it's eventual alienation in favour of Central Council for Research in Yoga and Naturopathy (CCRYN), Department of Ayush, Ministry of Health and Family Welfare, Govt. of India, New Delhi for the purpose of setting up of Central Research Institute with 100 bedded hospital of Yoga and Naturopathy.

Schedule of Lands

Mouza	Khata	Plot No	Area	Kisam
M/Z Binjhagiri, PS Chandaka No.10	331	133	Ac.20.000	Gochar

(Trace map attached)

Collector, Khordha

Memo No. 2075, Dt. 4.9.12

Copy along with 3 copies of order and DR case record bearing No.04/12 forwarded to the Tahsildar, Jatni for information and necessary action. He is instructed to publish the order as per Rule 5(3) of the OGLS Rules, 1983 and correct the RORs and furnish a true copy of the corrected record to this office for further necessary action at this end. He should submit the alienation proposal to this at the earliest.

Collector, Khordha

Memo No. 2076, Dt. 4.9.12

Copy to the Sub Collector, Bhubaneswar for information and necessary action

Collector, Khordha

Handwritten Odia text: ପ୍ରକାଶନ ନମ୍ବର ୨୦୭୫ ତାରିଖ ୦୫/୦୯/୧୨  
କିଛି କାର୍ଯ୍ୟ ସମ୍ପର୍କରେ ସମସ୍ତଙ୍କୁ ଜଣାଇବା ପାଇଁ  
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ସମସ୍ତଙ୍କୁ ଜଣାଇବା ପାଇଁ

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