

BEFORE THE HON'BLE NATIONAL COMPANY LAW TRIBUNAL
SOUTH BENCH AT CHENNAI

APPEAL NO. 52 OF 2021

IN THE MATTER OF:

Tejas S Rao

...Appellant

-VS-

State of Karnataka & Ors.

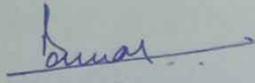
...Respondents

COUNTER AFFIDAVIT OF LAXMIKANT S. PAWAR

I, Laxmikant S. Pawar, Son of Shivu Pawar, aged about 51 years, Member Secretary of the Respondent No. 2 herein, having office at No. 297/5588, Bagegowda Layout, Thirumale Road, Magadi Town, RamanagaraDist, Pin Code - 562 120, do hereby solemnly affirm and sincerely state as follows:

1. I submit that I am the Member Secretary of the Respondent No. 2, and as such authorized to represent Respondent No. 2 in the captioned Appeal. I submit that I am acquainted with the facts and circumstances of the captioned appeal from the records available with Respondent No. 2. I submit that I am competent to depose this Affidavit.
2. I submit that the Appellant herein has preferred the captioned appeal seeking, *inter alia*, (i) quashing the order dated 17.06.2021 (hereinafter referred to as, the '**Impugned Letter**') passed by the Respondent No. 2 under the provisions of TGR Notification dated 18.11.2003 issued under Section 5 of the Environmental Protection Act, 1986, (hereinafter referred to as, the '**EP Act**'); and (ii) direction to the Respondent No. 2 to consider the application of the Appellant without citing the TGR notification in so far as the said notification is irrelevant to the instant case of the Appellant.
3. I submit that all averments made in the caption appeal are hereby denied except those that are specifically admitted hereinunder. I submit that no averment made in the captioned appeal shall be deemed to have been admitted for want of specific traversal.




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A. NATURE OF RESPONDENT NO. 2:

4. I submit that the State of Karnataka, through its power under Section 4A of the Karnataka Town and Country Planning Act, 1963 (hereinafter referred to as, the '**KTCP Act**'), notified the Magadi Local Planning Area as a local planning area. I submit that Magadi Local Planning Area is spread across 690.95 Sq. Km. consisting of 222 villages. I submit that the State of Karnataka, under Section 4C of the KTCP Act, constituted Respondent No. 2 as a Planning Authority with jurisdiction over the Magadi Local Planning Area.

B. THIPPAGONDANAHALLI RESERVOIR AND GOVERNMENT NOTIFICATION:

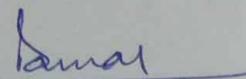
5. I submit that Thippagondanahalli Reservoir (hereinafter referred to as, the '**TGR**') built at the confluence of Arkavathi and Kumdvathi rivers is one of the source of drinking water to the city of Bengaluru and surrounding areas since 1930.
6. I submit that in view of checking uncontrolled disposal of effluent/sewage into the streams/surface water bodies within the catchment and to implement suitable measures for controlling over-exploitation of groundwater, it was decided to implement proper waste management system and programmes for revival of the tanks in the catchment area. I submit that in order to preserve the TGR catchment area, it was recommended to form a conservation zone covering entire catchment area by adopting suitable land utilization strategy, especially from the point of view of regulating the urbanization/ industrialization and to declare a protection zone with certain distance of radius around TGR. I submit that the State Government has issued notification *vide* No. FEE/215/ ENV /2000, dated 18.11.2003 (hereinafter referred to as, the '**TGR 2003 Notification**'), wherein the catchment area has been divided in to 4 zones by imposing certain developmental restrictions in respective zones.

I submit that thereafter the State Government, issued Government Order No. Urban/11/BMR/2017, Bengaluru, dated 20.07.2019, which amended the TGR-2003 Notification by modifying the restriction for constructions in each zone stipulated therein. I submit that the TGR 2003 Notification is still in force and is being strictly followed.



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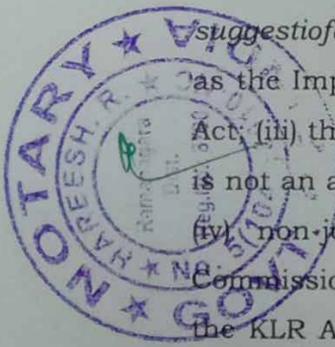

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falls under Zone – 3 and the TGR 2003 Notification (as amended) prohibits any activity other than agriculture. I submit that therefore, the Respondent No. 2 provided a reply dated 30-05-2020, to the Deputy Commissioner, Bengaluru Urban District, providing its findings and opining that the land conversion may be rejected.

11. I submit that the Appellant had also issued a request letter dated 08.06.2021, to the Respondent No. 2 seeking, *inter alia*, No Objection Certification for building and operating petrol bunk at the Appellant's Land. I submit that whilst the Respondent No. 2 is not the authority under the KLR Act, for conversion of agricultural land to other categories, Respondent No. 2 issued a letter dated 17.06.2021, in reply to the Appellant's letter dated 07.06.2021, intimating the Appellant of the its opinion issued to the Deputy Commissioner, Bengaluru Urban District. I submit that the Impugned Letter is not an order passed by the Respondent No. 2 an order under the KTCP Act or the KLR Act, but is only a communication issued to the Appellant. I submit that the Appellant has presumed the Impugned Letter to be an order of rejection of his request and impugned the same.

12. I submit that the Deputy Commissioner, Bengaluru District, being the appropriate authority under Section 95(2) of the KLR Act, shall be passing order in the application preferred by the Appellant for diversion of the Appellant's Land to operate petrol bunk. I submit that the Deputy Commissioner, Bengaluru Urban District, may only consider the opinion dated 30-05-2020, provided by the Respondent No. 2 in making such decision. I submit that therefore the application of the Appellant made before the Deputy Commissioner, Bengaluru Urban District, has not been rejected by the Respondent No. 2.

13. I submit that the captioned appeal is liable to be dismissed, *inter alia*, on the following grounds: (i) the Appellant is guilty of *suppressio veri* and *suggestio falsi*; (ii) the appeal is not maintainable either in law or on facts as the Impugned Reply is not an order passed under Section 5 of the EP Act; (iii) the relief as sought for cannot be granted as the Respondent No. 2 is not an authority to grant land diversion certificate for agricultural land; (iv) non-joinder of the proper and relevant party i.e. the Deputy Commissioner, Bengaluru Urban District, the appropriate authority under the KLR Act; (v) Impugned Reply is not an order that could be assailed,



but is only a communication in reply to the Appellant's letter; (vi) alternative and efficacious remedy under the relevant Statute is available to the appellant; and (vii) grounds raised by the Appellant are untenable.

D. APPELLANT IS GUILTY OF SUPPRESSIOVERI SUGGESTIOFALSI:

14. I submit that the appellant is guilty of I submit that the Applicant is guilty of *suppressioveri* and *suggestiofalsi*. I submit that the Appellant herein has not even filed before this Hon'ble Tribunal, the letter dated 08.06.2021, preferred by the Appellant to the Respondent No. 2. I further submit that the Appellant has neither pleaded nor produced the application lodged by the Appellant with the Deputy Commissioner, Bengaluru Urban District, *vide* Affidavit ID No. 185594, dated [26-05-2020] and Land Conversion No. 156282. I therefore, submit that the captioned application is liable to be dismissed on this ground also.

E. APPEAL IS NOT MAINTAINABLE:

15. I submit that the captioned appeal is not maintainable either in law or on facts. I submit that the Appellant has preferred the captioned appeal under Section 16 read with 18 of the National Green Tribunal Act, 2010 (hereinafter referred to as, the '**NGT Act**'), averring that the TGR 2003 Notification has been issued under Section 5 of the EP Act, and that any order issued by virtue of the Section 5 of the EP Act is appealable before this Hon'ble Tribunal under Section 16 of the NGT Act. I submit that as per Section 16 of the NGT Act, "*any direction issued*" under Section 5 of the EP Act alone is appealable. I submit that the TGR 2003 Notification or any other direction issued under Section 5 of the EP Act has not been challenged by the Appellant. I submit that the Impugned Reply is not a direction under Section 5 of the EP Act. I therefore submit that the captioned appeal is liable to be dismissed on this ground alone.

16. I submit that Section 16(g) of the NGT Act is distinct from the Section 16(a), (b), (d), (e), & (f) of the NGT Act, as the latter stipulates appeal against any direction or order passed under the relevant environmental statute therein and the former stipulates an appeal against the '*direction*' issued under the Section 5 of the EP Act. I submit that in view of the foregoing, the Impugned Reply can no way be construed as a '*direction*' issued under Section 5 of the EP Act. I therefore submit that the captioned appeal is liable to be dismissed on this ground also.



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F. RESPONDENT NO. 2 IS NOT THE AUTHORITY TO GRANT NOC:

17. I submit that the Appellant has sought for direction to consider the application for providing No Objection Certificate for building and operating a petrol bunk. I submit that as per Section 14(2) of the KTCP Act read with Section 95(2) of the KLR Act, the Deputy Commissioner of the Bengaluru Urban District is the appropriate authority to provide land conversion certificate to the Appellant's Land to enable operation of petrol pump, as the Appellant's Land is an agricultural land. I submit that therefore the relief sought for by the Appellant even if granted cannot be executed by the Respondent No. 2. It is submitted that the captioned appeal is liable to be dismissed for this reason also.

G. NON-JOINDER OF PROPER AND NECESSARY PARTY:

18. I submit that the appropriate authority under Section 95(2) of the KLR Act is the Deputy Commissioner, Bengaluru Urban District, who has to accord permission to the Appellant for land diversion of the Appellant's Land to be used for purposes other than agriculture. I submit that the Appellant, for the reasons best known to him, has not made the Deputy Commissioner, Bengaluru Urban District, as a party respondent in the captioned appeal. I submit that therefore, the captioned appeal is liable to be dismissed for non-joinder of the proper and necessary party.

H. IMPUGNED REPLY IS NOT AN ORDER:

19. I submit that the reply dated 17.06.2021, assailed by the Appellant in the captioned appeal, is not an order. I submit that the Appellant had received a letter requesting NOC Respondent No. 2 for using the Appellant's Land viz. agricultural land for building and operating a petrol bunk. I submit that the Impugned Reply was issued by the Respondent No. 2 indicating the opinion provided for by the Respondent No. 2 to the Deputy Commissioner, Bengaluru Urban District. I submit that therefore the Impugned Reply is not even an order for it to be assailed before this Hon'ble Tribunal. Hence, the captioned appeal is liable to be dismissed on this ground also.

I. ALTERNATIVE AND EFFICACIOUS REMEDY AVAILABLE UNDER KTCP ACT AND/OR KLR ACT:

20. I submit that assuming but not conceding that the Impugned Reply is an order passed by the Respondent No. 2 under Section 15 of the KTCP Act

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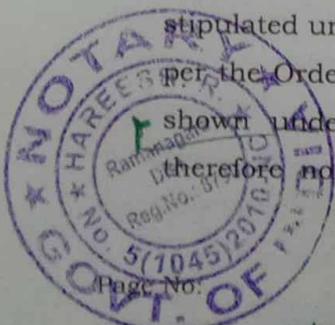
rejecting permission for change in land use as stipulated under Section 14(2) of the KTCP Act, then the Appellant can appeal against such rejection under Section 15(6) of the KTCP Act, before the appropriate Appellate Authority under the KTCP Act. I submit that the Appellant has an alternative and efficacious remedy under the KTCP Act. I submit that however the Appellant has not chosen to prefer any appeal before the Appellate Authority, and has preferred the captioned appeal. I submit that therefore, the captioned appeal is liable to be dismissed on this ground also.

21. I submit that Section 49 of the KLR Act, provides appeal against orders passed under the KLR Act, including order relating to diversion of agriculture land for other purposes under Section 95(2) of the KLR Act. I submit that thereafter Section 50 of the KLR Act, also provides for second appeal from the orders passed by the appropriate appellate authority under the KLR Act. I submit that however the Appellant has not chosen to prefer any appeal before the appropriate appellate authority, and has preferred the captioned appeal. I submit that therefore, the captioned appeal is liable to be dismissed on this ground also.

J. GROUND RAISED BY THE APPELLANT ARE UNTENABLE:

22. I submit that the Appellant has assailed the Impugned Reply, *inter alia*, on the following grounds: (i) the Respondent No. 2 has wrongly interpreted the TGR 2003 Notification and that the buffer zone for the Appellant's Land is 30 mts from the edge of the river; (ii) the Respondent No. 2 violated the principles of natural justice by passing the Impugned Reply without giving an opportunity of hearing to the Appellant; and (iii) the Respondent No. 2 did not provide any reason for rejection under the Impugned Reply. I submit that all the three grounds are untenable in law and on facts, and therefore, the captioned application is liable to be dismissed on this ground also.

23. I submit that as per the TGR 2003 Notification and even as per the Appellant's averments, the Appellant's Land falls under Zone - 3 as stipulated under the TGR 2003 Notification (as amended). I submit that as per the Order dated 20.07.2019, the buffer zone and prohibited activities shown under Annexure - I therein shall be adopted. I submit that therefore no person shall carry on activities other than agriculture or



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agriculture related activities without prior permission in Zone – 3. Hence, I submit that the Appellant cannot convert the Appellant's Land for building and operating a petrol bunk.

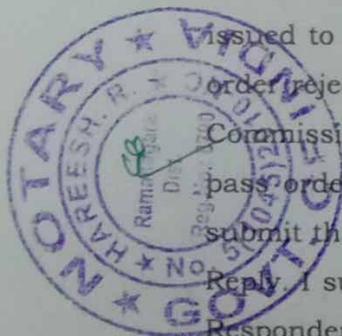
24. I submit that the averment that the Respondent No. 2 has violated the principles of natural justice by not giving opportunity of hearing to the Appellant before issuing the Impugned Reply is untenable and is liable to be rejected. I submit that the Impugned Reply is only a reply letter issued to the Appellant and not an order passed by the Respondent No. 2. I further submit that the law does not mandate the Respondent No. 2 to provide with an opportunity of hearing before replying to a letter. I submit that therefore, the captioned appeal is liable to be dismissed on this ground also.

25. I submit that the averment that the Respondent No. 2 has not provided any reason for rejecting the Appellant's request for NOC is untenable and is liable to be rejected. I submit that the Impugned Reply contains all the reasons and also cites the relevant TGR 2003 Notification as the basis for the conclusion arrived therein. I submit that therefore, the captioned appeal is liable to be dismissed on this ground also.

K. PARAWISE REMARKS:

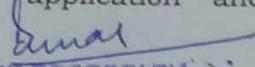
26. Reply to Para Nos. I&II: The contents of the paragraphs under reply are matters of record and therefore does not require any specific traversal.

27. Reply to Para No. III: The averments made in the paragraph under reply is hereby denied as being false, frivolous, and vexatious. I submit that the Appellant is put to strict proof of the same. I submit that the averments that the Impugned Reply dated 17.06.2021 issued by the Respondent No. 2 is an order rejecting the Appellant's application for the establishment of petrol fuel station is specifically denied as being false, frivolous, and vexatious. I submit that the Impugned Reply date 17.06.2021 is a reply issued to the letter dated 07.06.2021 issued by the Appellant and not an order rejecting any permission to the Appellant. I submit that the Deputy Commissioner, Bengaluru Urban District, is the appropriate authority to pass order on the application of the Appellant seeking land diversion. I submit that the Appellant has misconstrued the contents of the Impugned Reply. I submit that the averments in the paragraph under reply that the Respondent No. 2 has rejected the Appellant's application and



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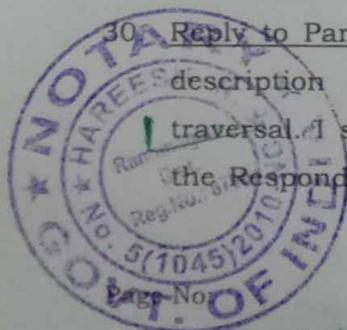

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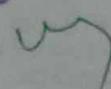
representation without understanding the intent of the TGR 2003 Notification and the Order dated 20.07.2019 in its true letter and spirit is specifically denied as being false, frivolous, and vexatious. I submit that in its opinion to the Deputy Commissioner, Bengaluru Urban District, and in the Impugned Reply, the Respondent No. 2 has interpreted and applied provisions of TGR 2003 Notification in letter and spirit. I submit that Respondent No. 2 has considered and correctly applied the TGR 2003 Notification as amended by the Order dated 20.07.2019. I submit that the Appellant is put to strict proof of the said averments.

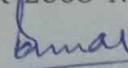
28. Reply to Para No. IV: The averments made in the paragraph under reply is hereby denied as being false, frivolous, and vexatious. I submit that the Appellant is put to strict proof of the same. I submit that the averments that the Respondent No. 2 issued with Impugned Reply by violating the principles of natural justice by not providing the Appellant with an opportunity of personal hearing and the Respondent No. 2 did not provide for any reasons in the Impugned Reply, are specifically denied as being false, frivolous, and vexatious. I submit that the Impugned Reply is only a reply letter issued to the letter of the Appellant dated 08.06.2021, and not an order. I therefore submit that the Respondent No. 2 is neither required to provide with an opportunity of personal hearing to the Appellant nor provide any reasons. I submit that nevertheless, the Impugned Reply does contain the reason and also cites the TGR 2003 Notification for the conclusion arrived therein. I submit that the captioned appeal is not maintainable under Section 16 of the NGT Act just because the TGR 2003 Notification was issued under Section 5 of the EP Act, as the Impugned Reply is not a '*direction*' as stipulated under Section 5 of the EP Act. I therefore submit that the averments in the paragraph under reply are baseless.

29. Reply to Para No. 1: The averments made in the paragraph under reply is not within the knowledge of the Respondent No. 2 and therefore, the Appellant is put to strict proof of the same.

30. Reply to Para No. 2: The averments in the paragraph under relating to description of the Respondent No. 1 & 2 does not require specific traversal. I submit that the averment in the paragraph under reply that the Respondent No. 2 is empowered under the TGR 2003 Notification to



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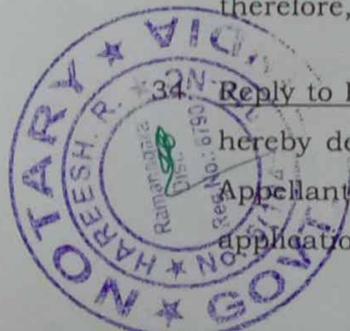
issue No Objection Certificate to various projects is false, frivolous, and vexatious. I submit that the Respondent No. 2 is empowered under Section 14& 15 of the KTCP Act, to provide permission and commencement certificate for change in land use. I submit that however if such a land is a agricultural land, then the Deputy Commissioner, Bengaluru Urban District, is the appropriate authority to grant permission for land diversion. I submit that on the request of the Deputy Commissioner, Bengaluru Urban District, the Respondent No. 2 only issues with its opinion for any land diversion. I therefore submit that the Appellant has misconstrued the powers of the Respondent No. 2.

31. Reply to Para No. 3: The averments made in the paragraph under reply is hereby denied as being false, frivolous, and vexatious. I submit that the Appellant is put to strict proof of the same. I submit that the averment in the paragraph under reply that the Impugned Reply is an order passed by the Respondent No. 2 and that the same is appealable specifically denied as being baseless and vexatious. I submit that as stated above, the Impugned Reply is only a reply letter and not an order, and the same is not appealable under Section 16 of the NGT Act. I submit that the contents of paragraph no. 27 hereinabove may be treated as the reply to the remainder of the averments made in the paragraph under reply.

32. Reply to Para No. 4: The averments made in the paragraph under reply is hereby denied as being false, frivolous, and vexatious. I submit that the Appellant is put to strict proof of the same. I submit that the contents of paragraph no. 28 hereinabove may be treated as the reply to the averments made in the paragraph under reply. I submit that the captioned appeal is not maintainable as the Impugned Reply is not a direction issued under Section 5 of the NGT Act. I therefore, submit that the captioned appeal is liable to be dismissed on this ground also.

33. Reply to Para Nos. 5, 6, & 7: The averments made in the paragraphs under reply are not within the knowledge of the Respondent No. 2 and therefore, the Appellant is put to strict proof of the same.

34. Reply to Para No. 8: The averments made in the paragraph under reply is hereby denied as being false, frivolous, and vexatious. I submit that the Appellant is put to strict proof of the same. I submit that it is true that the application issued a letter dated 08.06.2021, seeking No Objection



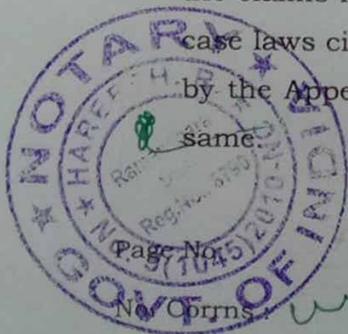
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Certificate for establishing petrol bunk. I submit that the averment in the paragraph under reply that the Respondent No. 2 misconstrued the TGR 2003 Notification is false and baseless. I submit that the classification made by the Respondent No. 2 is in furtherance to the TGR 2003 Notification.

35. Reply to Para No. 9: The averments made in the paragraph under reply is hereby denied as being false, frivolous, and vexatious. I submit that the Appellant is put to strict proof of the same. I submit that the application dated 30.05.2020, said to have been submitted by the Appellant herein is not with the Respondent No. 2. I submit that the Appellant did not even produce the said application before this Hon'ble Court. I submit that it appears the Appellant has preferred an application of the same date with the Deputy Commissioner, Bengaluru Urban District, seeking land diversion for using the Appellant's Land for other purposes than agriculture. I submit that the Respondent No. 2 has only provided an opinion to the Deputy Commissioner, Bengaluru Urban District, about the classification of the Appellant's Land, and the Deputy Commissioner, Bengaluru Urban District, has to take a final decision on the Appellant's application. I submit that the Respondent No. 2 has applied the TGR 2003 Notification strictly in providing the opinion on the Appellant's Land.
36. Reply to Para No. 10: The averments made in the paragraph under reply that the Respondent No. 2 has not understood the intent of the TGR 2003 Notification is hereby denied as being false, frivolous, and vexatious. I submit that the Appellant is put to strict proof of the same.
37. Reply to Para Nos. i to v and 11: The averments made in the paragraphs under reply is replication of the statement of objects and purpose as stipulated under the TGR 2003 Notification, and therefore, does not require any specific traversal.
38. Reply to Para Nos. 12 to 15: The averments made in the paragraphs under reply are not within the domain of knowledge of the Respondent No. 2. I submit that the Appellant has not produced any document to substantiate the claims made in the paragraphs under reply. I further submit that the case laws cited by the Appellant do not relate to any of the grounds raised by the Appellant. I submit that the Appellant is put to strict proof of the same.

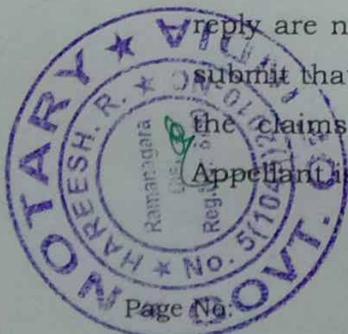


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39. Reply to Para No. 16: The averments made in the paragraph under reply is hereby denied as being false, frivolous, and vexatious. I submit that the Appellant is put to strict proof of the same. I submit that the averment that the Appellant's Land would fall within Zone - 3 under the TGR 2003 Notification is not denied, however, the averment that establishing petrol bunk in Zone - 3 is not restricted is denied as being baseless and misconception of the TGR 2003 Notification. I submit that TGR 2003 Notification specifically stipulates that only agricultural activity shall be carried out in Zone - 3 and therefore, it logically follows that operation of petrol bunk in the said Zone is prohibited. I submit that the averment relating the effect of the proposed petrol bunk on the inflow of the river water is baseless and not corroborated by any evidence. I submit that averment that the Respondent No. 2 has not applied its mind is denied as being false, baseless, and vexatious. I submit that a bare reading of the TGR 2003 Notification would show that the conclusion arrived at by the Respondent No. 2 is in adherence to the TGR 2003 Notification. I submit that the averment that the Appellants have no other remedy but to approach this Hon'ble Tribunal under Section 16 of the NGT Act is denied as being false, frivolous, and vexatious. I submit that the Impugned Reply is not appealable and the consequent prayer not maintainable, either in law or on facts.

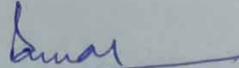
40. Reply to Para No. 17: The averments made in the paragraph under reply is hereby denied as being false, frivolous, and vexatious. I submit that the Appellant is put to strict proof of the same. I submit that the Appellant's Land is situated within a distance of 500 mts. from the Arkavathy river, and therefore, falls under Zone - 3 in the TGR 2003 Notification. I submit that the issuance of the No Objection Certificate for land diversion for the Appellant's Land is within the purview of the Deputy Commissioner, Bengaluru Urban District, and therefore, the Appellant has to approach and seek an order from the said authority.

41. Reply to Para Nos. 18 to 20: The averments made in the paragraphs under reply are not within the domain of knowledge of the Respondent No. 2. I submit that the Appellant has not produced any document to substantiate the claims made in the paragraphs under reply. I submit that the Appellant is put to strict proof of the same.

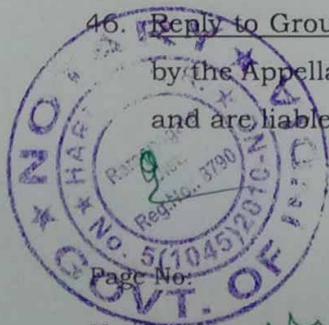


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42. Reply to Para Nos. 21: The averments made in the paragraphs under reply relating to the permission sought for by the Appellant from other authorities are not within the domain of knowledge of the Respondent No. 2. I submit that the Appellant is put to strict proof of the same. I submit that the averment that the Respondent No. 2 has rejected the application of the Appellant by misconstruing the TGR 2003 Notification is false and baseless.
43. Reply to Para Nos. 22: The averments made in the paragraph under reply are made without any document to substantiate the same. I submit that the Appellant is put to strict proof of the same.
44. Reply to Para Nos. 23: The averments made in the paragraph under reply are denied as being false, frivolous, misconstrued, and vexatious. I submit that the Appellant is put to strict proof of the same. I submit that the averment that the captioned appeal relates to interpretation of the TGR 2003 Notification is denied as being false and baseless. I submit that there is not a single ground raised by the Appellant that relates interpretation of the TGR 2003 Notification. I submit that the prayer as sought for by the Appellant cannot be granted as captioned appeal is not maintainable. I submit that the appropriate authority to issue an order on the Appellant's application for land diversion has not passed an order as yet. I therefore submit that the captioned appeal is premature. I submit that the Appellant has not even pleaded as to how the balance of convenience is on his side and the irreparable prejudice would be caused to him. I submit that the captioned appeal is liable to be dismissed *in liming*.
45. Reply to Para Nos. 24: The averments made in the paragraph under reply are denied as being false, frivolous, misconstrued, and vexatious. I submit that the Appellant is put to strict proof of the same. I submit that the averment that the TGR 2003 Notification does not prevent or bar establishment of petrol bunk as the area itself is a residential zone is denied as being false and baseless. I submit that the Appellant's Land is situated in an agricultural zone under the Master Plan - 2031.
46. Reply to Grounds and Prayer: In view of the foregoing, the grounds raised by the Appellant and the prayer sought for by the Appellant, are untenable and are liable to be dismissed.



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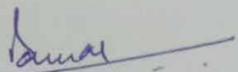
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47. I submit that the Respondent No. 2 craves the leave of this Hon'ble Tribunal to raise additional grounds or file additional affidavit supporting its case, at a later stage in the captioned appeal including during the final arguments.

It is therefore most humbly prayed that this Hon'ble Tribunal may be pleased to dismiss the captioned appeal, and pass such further or other order as this Hon'ble Tribunal deems fit in the facts and circumstances of the case, and thus render justice.

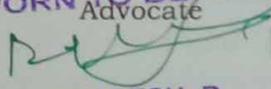
Solemnly Affirmed at Magadi
This the 18 day of
October 2021 and the
Deponent signed his
Name in my presence.


Deponent
MEMBER SECRETARY
MAGADI PLANNING AUTHORITY
MAGADI

Before Me,



*Magadi,
Dated: 18/10/21*

SWORN TO BEFORE ME
Advocate

HAREESH. R.
ADVOCATE & NOTARY
Juttanahalli, Kempasagara Post,
Kasaba Hobli, Magadi Taluk,
Ramanagara District.