

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

**Execution Application No.10 of 2023 (SZ)**

**IN**

**Original Application No.222 of 2014 (PB)**

IN THE MATTER OF:-

**The Forward Foundation and Ors.**

... **Applicant(s)**

**Vs.**

1. **State of Karnataka**
2. **Ministry of Environment and Forests Regional Office (SZ)**
3. **State Level Environment Impact Assessment Authority**
4. **Karnataka State Pollution Control Board**
5. **Bangalore Water Supply and Sewerage Board**
6. **Lake Development Authority**
7. **Karnataka Industrial Areas Development Board**
8. **Bangalore Development Authority**
9. **Mantri Techzone Private Limited**
10. **Core Mind Software and Services Private Limited**

... **Respondent(s)**

**VOLUME - 3**

<b>SL. NO.</b>	<b>PARTICULARS</b>	<b>PAGE NO.</b>
3.	<b><u>Annexure-R/2.</u></b> True Copy of the Letter dated 8-2-2021.	378 - 378
4.	<b><u>Annexure -R/3.</u></b>	379 – 395



	True Copy of the Affidavit filed by the Karnataka Lake Development Authority.	
5.	<b><u>ANNEXURE-R/4</u></b> True Copy of the Representations from 2021 to 2024 in respect of issuance of amended Environmental Clearance and other approvals/sanctions/orders for commencement of the Project proponent/Respondent No.9	396 – 416
6.	<b><u>Annexure -R/5.</u></b> Copy of the letter date 30-5-2019.	417 - 418

Date: 3<sup>rd</sup> March 2024  
Place: Chennai

**CHANDRAMOULI PRABHAKAR**

**M/s. PC Law Chambers**

C-2 (2<sup>nd</sup> Floor), Vasanth Apartments, 75/40,  
CP Ramaswamy Road, Alwarpet, Chennai 600-018

Ph: 99404 69099

Email: chandramouli@pclawchambers.com

**For Pages 001 – 190, please see Volume – 1**

**For Pages 191 – 377, please see Volume – 2**

**For Pages 378 - 418, please see Volume – 3**



mantri

Date: 08.02.2021

To,

The Executive Engineer – 2  
Karnataka Industrial Areas Development Board  
#49, 4th & 5th Floors, East Wing,  
Khanija Bhavan, Racecourse Road,  
Bengaluru – 560 001.

Sir,

**Sub:** Action taken according to the orders of the Hon'ble NGT**Ref:** Your letter bearing No.KIADB/EE-2/1234/A/2020-21, dated 08.12.2020.

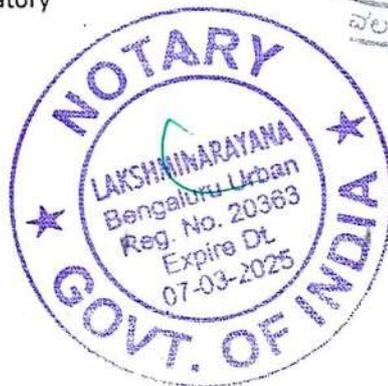
This is in reference to your above referred letter dated 08.12.2020, received on 01.02.2021. Adverting to your subject communication, we wish to inform you that we had intimated to KIADB, State Government and Karnataka Lake Conservation and Development Authority (KLCDA) that Mantri Techzone Pvt Ltd (MTPL) was not holding land measuring 3 acre 10 guntas of land in survey no. 43 and BDA has taken over the land. In this regard KLCDA has filed an Affidavit dated 27.07.2017 to the Court stating that the said land is taken over by BDA.

Due to adverse circumstances suffered by us in NGT matter, we have not yet proceeded for remaining construction activities. Shortly we will submit our proposed construction plan incorporating the conditions imposed.

Thanking You,

Yours Faithfully,  
For Mantri Techzone Pvt. Ltd.

  
Ravishankar B.S.  
Authorised Signatory



TRUE COPY ATTESTED BY ME  
  
LAKSHMINARAYANA  
Advocate & Notary Public  
GOVT OF INDIA  
# 15, 1st Main, 2nd Cross  
Near Impact College, Amco Layout, K digenahalli  
Bengaluru Urban, Karnataka -560092

178

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
PRINCIPAL BENCH, AT NEW DELHI

ORIGINAL APPLICATION NO. 222 OF 2014  
(Civil Appeal No.5016/2016 & 10992/2016)

IN THE MATTER OF:

Forward Foundation & Ors. ... APPLICANTS

versus

State of Karnataka & Others ... RESPONDENTS

AFFIDAVIT

Filed on behalf of Respondent/KLCDA in compliance with the  
directions issued by this Hon'ble Tribunal vide Order dated  
04.05.2016 & 26.05.2017

I, Smt Seema Garg, Daughter of Shri Saligram Garg, aged about 51 years, No.49, 2nd Floor, Parisara Bhavan, Church Street, Bangalore 560 001 do hereby solemnly affirm and state on oath as follows:-

1. I am the Chief Executive Officer of the Karnataka Lake Conservation and Development Authority and I am fully conversant with the facts of the case, hence I am competent and authorized to file this affidavit.
2. The Government of Karnataka has enacted 'The Karnataka Lake Conservation and Development Authority Act, 2014' (Karnataka Act No.10 of 2015), which has come into effect from 5-3-2016. The Karnataka Lake Conservation and Development Authority ('the Authority' for short) created under the Act has been functional since November 2016. The Authority, even at present, is understaffed and without an adequate budget allocation.
3. This Authority is entrusted with the responsibility of protection, conservation and rejuvenation of water bodies like tanks, lakes, wetlands and their catchment areas, inlets and outlets for ensuring



  
Chief Executive Officer  
Karnataka Lake Conservation & Development Authority  
Bangalore



long term sustenance of such water bodies, and or other matters <sup>(17)</sup> connected there with or incidental thereto. This Respondent - Authority has to exercise regulatory control over all the lakes within its jurisdiction including prevention and removal of encroachment of lake. Even though the jurisdiction of the Authority extends to all the lakes in Karnataka State that are located within all Municipal Corporations in the State as well as areas over which Bangalore Development Authority has jurisdiction, presently, the Authority is entrusted with custody of only four lakes, viz., (1) Agara Lake, (2) Hebbal Lake, (3) Nagawara Lake and (4) Vengalahnakeri Lake. The other lakes in Bangalore are with custody of either the Bangalore Development Authority (BDA), Bruhat Bangalore Mahanagara Palike (BBMP) or the Karnataka Forest Department.

4. This Hon'ble Tribunal passed orders in OA.No.222 of 2016 on 4-5-2016, interalia directing that:

*"5. Both the Respondent Nos.9 & 10 shall ensure that debris or any construction material that has been dumped into the Rajakaluves, or their Banks and on the buffer zone of wetlands should be removed within four weeks from today. In the event they fail to do so, the same shall be removed by the Lake Development Authority along with the State Administration and recover charges thereof from the said respondents."*

5. In obedience to the aforesaid directions, this Respondent Authority initiated necessary action and took steps against respondent Nos.9 & 10 and wrote to the said two companies to comply with the directions. In the meanwhile, the Authority also called upon other Authorities, in whose custody lakes have been entrusted, to adhere



*[Signature]*  
Chief Executive Officer  
Karnataka Lake Conservation & Development Authority  
Bangalore

to the aforesaid directions and implement the same, with regard to such other lakes in Bangalore.

6. Initially, Respondents 9 & 10 disputed their liability to comply with the aforementioned directions, due to which, this Authority was constrained to conduct survey of the encroached area, determine the volume of debris dumped thereon and calculate the cost of removing and transporting the debris and also took up the task of identifying a location suitable for dumping the removed debris. This Authority had identified an abandoned quarry where the debris could be dumped and sought permission of the Deputy Commissioner, Bengaluru Urban District to permit this Authority to use the abandoned quarry to dump the debris.
7. While the approval was awaited, this Hon'ble Tribunal passed another order on 26-5-2017 as under:-

*"We have heard the Learned counsel appearing for the parties. Nobody is on behalf of State of Karnataka. We direct that all the respondents and stakeholders shall file Status Report in regard to compliance of the directions contained in our Judgment dated 04th May, 2016.*

*Further, the Lake Authority as well as all other respondents of Government of Karnataka will place on record as to how many offending structures which fall within the buffer zone as defined in the Judgment. Let the needful be done within three weeks from today without default."*

8. In obedience to the aforesaid directions of this Hon'ble Tribunal, this Respondent - Authority directed Project Proponent M/s. Mantri Techzone Private Limited to take immediate necessary action for



*[Signature]*  
Chief Executive Officer  
Karnataka Lake Conservation & Development Authority  
Bangalore

(187)

removal of debris and other wastes on or before the 30<sup>th</sup> June 2017 without fail and to furnish a report to this Respondent - Authority supported with documentary proof and evidence so as to enable filing an Affidavit of compliance before this Hon'ble Tribunal. A copy of the letter dated 30-5-2017 is produced herewith and marked as ANNEXURE -R1.

9. The Project Proponent M/s. Mantri Techzone Private Limited while acknowledging the letter dated 30-5-2017 issued by this Respondent - Authority reported that removal of debris and excavated soil in the land measuring 3A-10G situated in Survey No.43, Agara village in the Bellandur tank is in progress and in view of several spells of rain the progress of removal of debris had slowed down, thereby causing a delay in completing the removing of excavated soil. Hence, they requested to provide extension of time till 10-7-2017 to complete the work and submit the compliance report. A copy of the letter addressed to this Respondent - Authority by the Project Proponent M/s. Mantri Techzone Private Limited, dated 1-7-2017, together with photographs taken at the site is produced herewith and marked as ANNEXURE -R2.

10. It is submitted that in obedience to the directions issued by this Hon'ble Tribunal on 4-5-2016 and 26-5-2017, the Project Proponent has submitted a report on removal of excavated soil, informing that removal of excavated soil and debris has since been completed. A copy of the report dated 10-7-2017, together with photographs taken at the site as sent to this Respondent - Authority by the Project Proponent - M/s. Mantri Techzone Private Limited are produced herewith and marked as ANNEXURE -R3.



Chief Executive Officer  
Karnataka State Conservation & Development Authority  
Bengaluru

- 182
11. It is submitted that upon the receipt of the final report by the Project Proponent intimating that the entire muck has been removed from the site, the Assistant Executive Engineer of this Respondent - Authority visited the site. In his Inspection Report, the Assistant Executive Engineer has reported that the Project Proponent M/s. Mantri Techzone Private Limited has removed debris, C&D wastes and soil until 12.7.2017 and the total quantity of muck removed so far is to an extent of 62497.5 cu.mts. Copies of photographs taken at the site are produced herewith and marked as **ANNEXURE -R4**.
12. This Hon'ble Tribunal, in its Order dated 4-5-2016, had also issued the following Specific Conditions/Directions to Respondent 9;

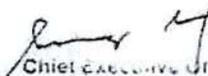
*"In addition to the above directions which should be equally part of EC condition in respect of respondents Nos. 9 & 10, following specific conditions shall apply to respondent no. 9:*

*i. Reclaimed area of the lake to the extent of 3 acres 10 guntas in survey no. 43 should be restored to its original condition at the cost of project proponent. The possession of this area should be restored by Respondent No. 9 to the concerned Authorities immediately. In addition, a buffer zone of 75 m should be provided between the lake and the project area and this should be maintained as green area.*

13. This Hon'ble Tribunal, by the same Order, redefined the buffer zones to be maintained in respect of lakes and primary, secondary and tertiary Rajakaluves and also issued General Directions, which reads:

*"This buffer/green zone would be treated as a no construction zone for all intent and purposes. This is*



  
 Chief Executive Officer  
 Karnataka Lake Conservation & Development Authority  
 Bangalore



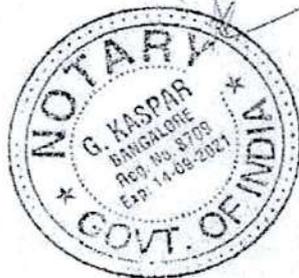
absolutely essential for the purpose of sustainable development, particularly keeping in mind the ecology and environment of the area in question.

All the offending constructions raised by Respondents 9 and 10 of any kind including boundary walls shall be demolished which falls within such areas. Wherever necessary dredging operations are required, the same shall be carried out to restore the original capacity of the water spread area and/or wetlands. Not only the existing construction would be removed but also none of these respondents - Project Proponents would be permitted to raise any construction in this zone.

All authorities, particularly, Lake Development Authority shall carry out this operation in respect of all the water bodies/lakes of Bangalore."

14. This Respondent - Authority called upon various authorities, viz., BWSSB, KSPCB, BDA, BBMP, Deputy Commissioner, Bengaluru Urban District, requesting them to inform to this Authority about the steps taken by them in compliance with the aforesaid directions and directed them to strictly follow the prescribed buffer zones. A copy of the letter of this Authority dated 2-6-2016 is produced herewith and marked as ANNEXURE - R5.

15. The issue relating to the encroachment of lands adjoining lakes in and around Bangalore City came up for discussion in the Karnataka Legislative Assembly and the Speaker of the Karnataka Legislative Assembly has constituted a Legislative Committee to inquire into the issue. The Legislative Committee has held regular meetings with various agencies of the Government and has also conducted field visits. This Committee, which was already functional, when this



*[Signature]*  
Chief Executive Officer  
Karnataka Lakes Conservation & Development Authority  
Bangalore

184

Hon'ble Tribunal issued directions on 4-5-2016, took note of the directions, and sought information from all the concerned agencies of the Government, vide its Letter dated 22-7-2016. A copy of the Letter dated 22-7-2016 is produced herewith and marked as ANNEXURE - R6. The letter solicits complete information from all concerned agencies regarding permissions given by the BDA, BBMP, Environment Department and other Departments, in the buffer zone of tanks till then and directed withdrawal of such permissions and stoppage of issuance of fresh permissions. This Authority has also sought opinion of the Secretary (Ecology & Environment) with respect to earmarking of Green/Buffer Zone in the Revised Master Plan for Bengaluru, 2031. A copy of the letter of this Authority 5-11-2016 is produced herewith and marked as ANNEXURE - R7. The Legislative Committee has not yet furnished its Report.

16. As submitted earlier, this Respondent - Authority is the custodian of four lakes, viz., Agara, Nagawara, Vengalhanakere and Hebbal lakes located in the BBMP limits. There are about 210 lakes which are under the custody of various Authorities of Government. The Government has nominated Departments/Authorities to be the Custodian of the lakes. In pursuance to the specific/ general directions issued by this Hon'ble Tribunal on 4-5-2016, regarding buffer zone, information has been obtained with regard to buildings and structures, both existing and under construction, in the buffer zone of four lakes. A statement indicating the details of buildings and offending structures which fall within the buffer zone of four lakes in the custody of this Respondent - Authority is produced herewith and marked as ANNEXURE - R8.



  
 Chief Executive Officer  
 Karnataka Lake Conservation & Development Authority  
 Bengaluru



17. As may be seen from the statement, furnished above, the constructions/buildings within the redefined buffer zone are independent houses and not projects involving multi-storied constructions, requiring environmental clearance. Many of these constructions have come up several years before the directions were issued by this Hon'ble Tribunal. At this stage, this Authority is unable to provide the correct information about the offending structures in the buffer zone of the other lakes and Rajakaluves, in view of the fact that, this Authority neither has the necessary man power to conduct the surveys/measurements nor it is in possession of budgetary allocation to undertake the expenses of getting the survey done through third party agencies.

18. The directions of this Hon'ble Tribunal and compliance by this Authority, if produced hereunder in tabulated form for ready reference:

Direction Issued (Verbatim)	Compliance
1. All the offending constructions raised by Respondents No.9 and 10 of any kind including boundary wall shall be demolished which falls within such areas. Wherever necessary dredging operations are required, the same should be carried out to restore the original capacity of the water spread area, and/or wetlands. Not only the existing construction would be removed but also non of these	Boundary wall and muck has been removed by the Project Proponent. However, as regards action for removal of other structures falling within the buffer zone, the Authorities empowered to sanction building plans viz., BBMP/BDA are required to provide the information and to take appropriate action. The KLCDA has already requested all the departments/ Authorities to comply with the



Chief Executive Officer  
Karnataka Lake Conservation & Development Authority  
Bengaluru

<p>Respondents - Project Proponent would be permitted to raise any construction in this zone.</p> <p>All authorities, particularly Lake Development Authority shall carry out this operation in respect of all the water bodies/lakes of Bengaluru.</p>	<p>said directions of the Hon'ble NGT.</p>
<p>2. The capacity of the existing STPs to treat sewage is 729 MLD, whereas another 500 MLD sewage is proposed to be treated in 10 upcoming STPs. In this context, all the STPs operating in the area whether Government or privately owned, should meet the revised standards notified by CPCB/MoEF.</p>	<p>The concerned Authorities have already been requested to take necessary action in this regard.</p>
<p>3. Bangalore city receives treated potable water of 1360 MLD from river Cauvery whereas the requirement is for another 750 MLD and the entire area falls in critical zone in terms of ground water exploitation. Information reveals that only one million litre per month of STP treated water is used by builders for construction purpose. For this reason, the BWSSB issue partial NOC to various residential and commercial projects in respect of supply of potable water. In this context, following</p>	<p>The concerned Authorities have already been requested to take necessary action in this regard.</p> <p>The proposals regarding grant of EC are not referred to the KLCDA. The SEIAA is the statutory Authority considering such proposals.</p>



*[Signature]*  
 Chief Executive Officer  
 Karnataka Lake Conservation & Development Authority  
 Bangalore



<p>directions need to be issued.</p> <p>(i) All the time of grant of EC, the water requirement for the construction phase and operation phase should be considered separately. Due consideration should also be given for identification of source of supply of water and this should be a pre-requisite for grant of EC.</p> <p>(ii) All the project proponents should necessarily use only treated sewage water for construction purpose and this should be reflected in EC as a condition for construction phase.</p> <p>(iii) Wherever the quality of treated sewage water does not conform to the quality needed for construction, necessary upgradation in STP should be undertaken immediately.</p>	<p>A copy of the NGT Orders dated 04.05.2016 has been forwarded by the KLCDA to the all the Governmental Authorities/ Deputy Commissioners of Districts (limited to KLCDA's jurisdiction) to strictly comply with the General and Specific directions issued by Hon'ble NGT - vide KLCDA's letter dated 02/04.06.2016.</p> <p>The proposals regarding grant of EC are not referred to the KLCDA. The SEIAA is the statutory Authority considering such proposals.</p>
<p><b>Specific Conditions/ Directions for Respondent 9:</b> In addition to the above directions which should be equally part of EC condition in respect of respondents nos. 9 &amp; 10, following specific conditions shall apply to respondent no. 9:</p> <p>i. Reclaimed area of the lake to the extent of 3 acres 10 guntas in survey no. 43 should be</p>	<p>The Project Proponent has submitted that the extent of 3</p>



*[Signature]*  
Chief Executive Officer  
Karnataka Lake Conservation & Development Authority  
Bangalore

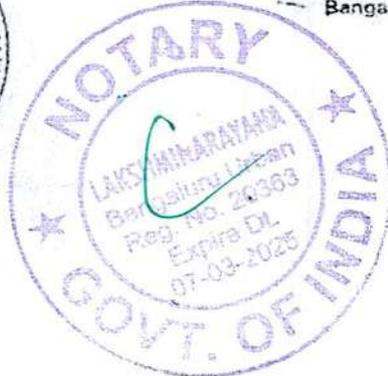
<p>restored to its original condition at the cost of project proponent. The possession of this area should be restored by Respondent No. 9 to the concerned Authorities immediately. In addition, a buffer zone of 75 m should be provided between the lake and the project area and this should be maintained as green area.</p>	<p>acres 10 guntas of land in Survey No.43 does not belong to them and they have requested KLCDA to take possession of the same. Accordingly, the BDA was requested to take possession of the said land. The BDA has already taken possession of the land.</p> <p>KLCDA has marked 75m buffer zone as per the NGT's directions and the Project Proponent has already been requested to maintain the same as per the NGT's order.</p>
<p>ii. In the remaining area, where primary Rajkalewa is abutting the project area, 50 m buffer zone on the side of the project area from the edge of the rajkalewa should be maintained as green belt.</p>	<p>BDA is the custodian of Bellandur lake. A copy of the NGT Order dated 04.05.2016 has already been sent to the BDA for taking necessary action and to comply with the Order.</p>
<p>iii. Several irrigation canals or tertiary rajkalewas taking off from the Agara tank were passing through the area of respondent no. 9, and serve the dual purpose of irrigating paddy fields and disposal of surface run off (storm water drains) during rainy season. However on account of the activities of the project, these drains have been totally obliterated. For the purpose of</p>	<p>BBMP, has already been requested to comply with the General and Specific directions of the Orders dated 04.05.2016 - vide - KLCDA's letter dated 23/24.05.2016. The Chief Engineer, Storm Water Drain (SWD), BBMP is being requested to look into these observations and initiate appropriate action expeditiously.</p>



*[Signature]*  
 Chief Executive Officer  
 Karnataka Lake Conservation & Development Authority  
 Bengaluru



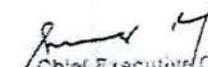
<p>proper disposal of storm runoff from the entire area falling between the Agara lake and the Bellandur Lake, respondent no. 9 must provide required number of storm water drains based on proper hydrological study. These storm drains should have a buffer zone of 15 m on either bank maintained as green belt.</p>	
<p>iv. The cumulative quantity of earth excavated for the construction of project is around 4 lakhs cubic meters in the depth range of 0 to 9 meters. This has created huge hillock like structure obstructing the natural flow pattern of surface runoff from Agara Lake side to Bellandur Lake side or primary Rajkalewas. For this purpose, during construction phase garland drain should be constructed around the existing dumping site for safe disposal of runoff to the Rajkalewas. For the disposal of excavated material, a proper muck disposal plan duly approved by SIEAA shall be prepared. In any case the plan should ensure that no muck/sediment flows into Rajkalewas and/or Belandur</p>	<p>No comments in so far as KLCDA is concerned. However, BBMP (SWD) has already been served with a copy of the Order dated 04.05.2016. This observation pertains to SWD of the BBMP.</p>

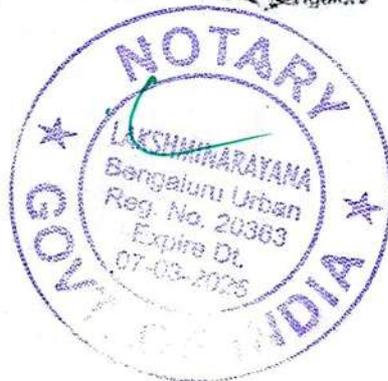


*[Signature]*  
 Chief Executive Officer  
 Kemataka Lake Conservation & Development Authority  
 Bangalore

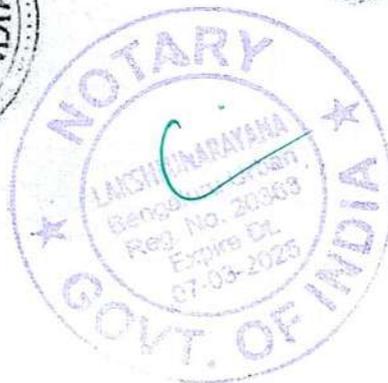
<p>lake.</p> <p>v. The Kharab land identified by Revenue Dept. admeasuring 1 acre 2 guntas should be demarcated and maintained separately as green belt.</p> <p>vi. The entire green belt created under the directions of this Tribunal should not to be considered as part of green belt of the project as part of EC condition and will be over and above the green belt as indicated in the EC.</p> <p>vii. In view of the heavy traffic load in the adjoining Sarjapur road, a proper study on the basis of traffic density, foot falls expected, etc., a proper plan needs to be prepared and the concept of service road exclusively for the project needs to be worked out and additional parking space created within the project area and incorporated as a part of the overall project layout, within a period of 3 months.</p>	<p>The KLCDA has no comments to offer, as it falls under the jurisdiction of Revenue Department. Copies of NGT Orders dated 04.05.2016 has already been sent to the concerned Deputy Commissioners of the District with a request to comply with the aforesaid directions.</p> <p>This direction does not directly pertain to KLCDA. The concerned Authorities viz., SEIAA has to consider this direction and take appropriate action.</p> <p>KLCDA has no comments, since this direction is required to be examined and implemented by the BBMP (Traffic Engineering Cell/ Project/ Road Infrastructure).</p>
<p><b>General Directions:</b></p> <p>1. We direct SEIAA, Karnataka to issue amended</p>	
<p>It is for the competent Authorities to take action as per</p>	



  
 Chief Executive Officer  
 Karnataka Lake Conservation & Development Authority  
 Bangalore



<p>order granting Environmental Clearance within four weeks from today incorporating all the conditions stated in this judgement and such other conditions as it may deem appropriate in light of this judgment and Inspection Note of the Expert Members. The 10 Project Proponents would be permitted to commence activity only after issuance of amended Environmental Clearance order.</p>	<p>the directions.</p>
<p>2. SEIAA Karnataka and MoEF shall ensure regular supervision and monitoring of the project and during the construction and even upon completion to ensure that activity is carried out strictly in accordance with the conditions of the order granting Environmental Clearance, this Judgment, Notification of 2006 and other laws in force.</p>	<p>It is for the competent Authorities to take action as per the directions.</p>
<p>3. The distances in respect of buffer zone specified in this judgment shall be made applicable to all the projects and all the Authorities concerned are directed to incorporate such conditions in the projects to whom</p>	<p>All the concerned Authorities have already been requested to take necessary action to comply with the Order dated 04.05.2016 passed by the NGT.</p>



*[Handwritten signature]*  
 Director, Environment Division  
 Ministry of Environment, Forest and Climate Change, Government of India

Environmental Clearance and other permissions are now granted not only around Belandur Lake, Rajkulewas, Agara Lake, but also all other Lakes/ wetlands in the city of Bengaluru.

4. We hereby direct the State of Karnataka to submit a proposal to the MoEF for demarcating wetlands in terms of Wetland Rules 2010 as revised from time to time. Such proposal shall be submitted by the State within four weeks from today and the MoEF shall consider the same in accordance with law and grant its approval or otherwise within four weeks thereafter. After such approval is granted by MoEF, the State would issue notification notifying such areas immediately thereafter in accordance with Rules and law.
5. Both the Respondents Nos. 9 and 10 shall ensure that debris or, any construction material that has been dumped into the Rajkulewas, or on their Banks and on the buffer zone of wetlands should be removed within four weeks from today. In the event they
- In obedience to the directions issued by the NGT regarding Notification of Wetlands, steps have been taken by the KLCDA to obtain information from all the concerned custodians of lakes in Karnataka (limited to the jurisdiction of KLCDA) and to consolidate information regarding wetlands and thereafter to make available the information for being sent to Government.
- The Project Proponent has already cleared the muck dumped in the buffer zone. However, the KLCDA is directing the Respondent No.9 to completely adhere to clear the entire muck/ material including the one dumped in Rajkulewas and to submit compliance report.



*[Signature]*  
Chief Executive Officer  
Karnataka Lake Conservation & Development Authority  
Bangalore



<p>fail to do so, the same shall be removed by the Lake Development Authority along with the State Administration and recover charges thereof from the said Respondents.</p>	
<p>6. There is a serious discrepancy even in regard to the measurement of land as far as Respondent no. 9 is concerned. Admittedly the Respondent has been allotted and is in possession of land admeasuring 63.94 acres, though Environmental Clearance has been granted for 2,92,636.03 Sq. Meters which is equivalent to 72.22 acres. For this reason alone, Environmental Clearance cannot be given effect to. While issuing the amended Environmental Clearance, SEIAA Karnataka shall take into consideration all these aspects and, if necessary, would require Respondent no. 9 to submit a fresh layout plan and the entire project may be revised in accordance with law.</p>	<p>No comments.</p>
<p>7. The amount of environmental compensation will be deposited prior to issuance of amended Environmental Clearance.</p>	



*[Signature]*  
 Chief Executive Officer  
 Karnataka Lake Conservation & Development Authority  
 Bangalore

134

<p><u>Directions in judgment dated 26-05-2017</u></p> <p>Offending structure which fall within the buffer zone as defined in the judgment.</p>	<p>The statement indicating the details of buildings and offending structures which fall within the buffer zone of four lakes in the custody of KLCDA is as shown below.</p>
--	--

19. In view of the above, it is submitted that this Authority has taken prudent steps to comply with the order of this Hon'ble Tribunal. This Authority submits that it shall abide by all future directions that may be issued by this Hon'ble Tribunal for the effective conservation and rejuvenation of the lakes in Bangalore.

Identified by me (K.G.V. MURTHY) *Adviser*

*[Signature]*  
 DEPONENT  
 Chief Executive Officer  
 Karnataka Lake Conservation & Development Authority  
 Bangalore

VERIFICATION

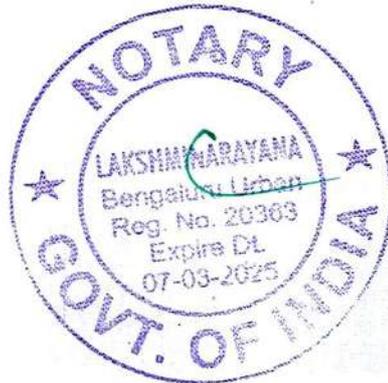
I, the above named deponent do hereby verify on this the 26<sup>th</sup> day of July, 2017 at Bengaluru that the contents of paragraphs 1 to 19 of this Affidavit are true and correct based on my personal knowledge and no material fact is suppressed there from.

*[Signature]*  
 DEPONENT  
 Chief Executive Officer  
 Karnataka Lake Conservation & Development Authority  
 Bangalore



SWORN TO BEFORE ME

*[Signature]*  
 G. KASPAR  
 D.L.L.B. DPM. DHRM  
 NOTARY PUBLIC, GOVT. OF INDIA  
 1079, 11<sup>th</sup> Cross, Kiam Villa, 1st Floor,  
 Near J.P. Nagar, Bengaluru, Karnataka  
 BANGALORE - 42 14, 560042



27 JUL 2017

TRUE COPY ATTESTED BY ME  
*[Signature]* 02/03/2024  
 LAKSHMINARAYANA  
 Advocate & Notary Public  
 GOVT OF INDIA  
 # 15, 1st Main, 2nd Cross  
 Near Impact College, Amco Layout, K. digambar  
 Bengaluru Urban, Karnataka - 560042



mantri

To  
The Member Secretary  
The State Environment Impact Assessment Authority (SEIAA)  
Forest, Ecology & Environment Department,  
M. S. Building, Bangalore-560001

Subject: Request for Extension of Environmental Clearance issued to us vide letter dated 17-02-2012.

Dear Sir/Ma'am,

1. Certain portions of lands were allotted by the Karnataka Industrial Area Development Board (hereinafter "KIADB") to M/s Mantri Techzone Pvt. Ltd. (formerly known as M/s Manipal ETA Infotech Ltd. and referred to hereinafter as "Project Proponent") vide notification dated 23.04.2004 for setting up of Software Technology Park, Commercial and Residential Complex, Hotel and Multi Level Car Parks. A copy of the notification dated 23.04.2004 is annexed here as **Annexure-1**.
2. As such, pursuant to the said allotment, all necessary permissions and clearances were obtained by the Project Proponent, the details of which are as enlisted hereinbelow:
  - i. Vide letter dated 28.06.2007, a plot admeasuring 63 acres 37 ½ guntas in several survey numbers of Agara & Jakkasandra villages, Begur Hobli, Bangalore South Taluk, Bangalore Urban District was allotted to the Project Proponent for establishment of Information Technology Park, R&D Centre etc. on a lease-cum-sale basis for a period of 11 years subject to terms and conditions contained in the Allotment Letter dated 28.06.2007. A copy of the Allotment Letter dated 28.06.2007 is annexed herewith as **Annexure-2**.
  - ii. A Possession Certificate dated 19.07.2008 was issued by the KIADB to the Project Proponent qua the plot admeasuring 63 acres 37 ½ guntas. A copy of the Possession Certificate dated 19.07.2008 issued by the KIADB is annexed herewith as **Annexure A-3**.
  - iii. A No-Objection Certificate dated 27.04.2011 was issued in favour of the Project Proponent by the Bangalore Electricity Supply Company Limited for arranging power supply to the



**Mantri Techzone Private Limited**  
CIN : U45201KA2003PTC033023

Mantri House, 41 Vittal Mallya Road T +91 80 4130 0000 www.mantri.in  
Bangalore 560001 F +91 80 4132 5000

proposed Residential and Commercial MS Building to the extent of 1886KVA subject to certain conditions. A copy of the No-Objection Certificate dated 27.04.2011 issued in favour of the Project Proponent by the Bangalore Electricity Supply Company Limited is annexed herewith as **Annexure-4**.

- iv. A clearance dated 16.04.2010 was also issued by the AGM (Transmission), Bharat Sanchar Nigam Limited (BSNL) in the name of the Project Proponent for construction of the proposed Mixed Development buildings project. A copy of the clearance dated 16.04.2010 issued by the AGM (Transmission), Bharat Sanchar Nigam Limited (BSNL) is annexed herewith as **Annexure-5**.
- v. A No-Objection Certificate for Height Clearance dated 21.12.2020 was obtained by the Project Proponent from the Airports Authority of India qua the construction of proposed structures at the project site. A copy of the No-Objection Certificate for Height Clearance dated 21.12.2020 is annexed herewith as **Annexure-6**.
- vi. A Prior Environmental Clearance was also issued by the State Level Environment Impact Assessment Authority, Karnataka in accordance with the Environment Impact Assessment Notification, 2006 vide its letter dated 17.02.2012 subject to terms and conditions contained therein. A copy of the letter dated 17.02.2012 issued by the State Level Environment Impact Assessment Authority, Karnataka is annexed herewith as **Annexure-7**.
- vii. Due Consent for Establishment under the Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981 dated 04.09.2012 was also obtained by the Project Proponent from the Karnataka State Pollution Control Board. A copy of the said Consent for Establishment dated 04.09.2012 is annexed herewith as **Annexure-8**.
- viii. Vide letter dated 26.04.2011 issued by the Bangalore Water Supply and Sewerage Board (BWSSB), the Project Proponent was directed to make payments towards the issuance of a No-Objection Certificate. Thereafter, a No-Objection Certificate dated 12.05.2011 was issued by BWSSB for providing water supply and underground facilities subject to conditions contained therein. A copy the letter dated 26.04.2011 and the



No-Objection Certificate dated 12.05.2011 issued by BWSSB are annexed herewith as **Annexure-9** and **Annexure-10** respectively.

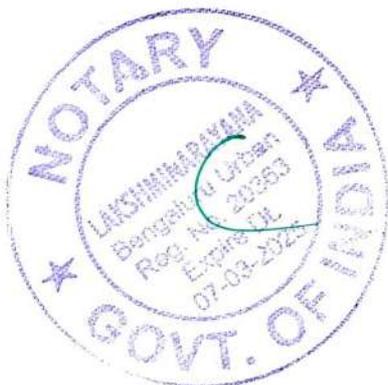
- ix. A No-Objection Certificate dated 30.06.2012 was also obtained from the Office of the Director General of Police by the Project Proponent. A copy of the No-Objection Certificate dated 30.06.2012 issued by the Office of the Director General of Police is annexed herewith as **Annexure-11**.
- x. The KIADB had also approved the drawings pertaining to the proposed buildings vide its letter dated 11.10.2013. A copy of the letter dated 11.10.2013 issued by the KIADB is annexed herewith as **Annexure-12**.

It is a matter of fact and record that the Project Proponent has continuously complied with and is willing to further continue complying with the various conditions contained in the clearances/no-objection certificates cited hereinabove **as well as is willing to comply with all the rules and regulations that are laid by the State Government for a project of this nature.**

3. However, in 2014, an Original Application viz. O.A. No. 222/2014 was moved before the Hon'ble National Green Tribunal (NGT) by a charitable trust named "The Forward Foundation" *inter alia* seeking stoppage of work of the Project Proponent for purportedly carrying out constructions in the catchment areas that drain rain water into the Bellandur Lake. As such, the project could not be completed within the stipulated time period because there was stay order of NGT on construction of the project.
4. That vide judgement dated 04.05.2016, the Hon'ble National Green Tribunal disposed O.A. 222/2014 and issued the following directions to the Project Proponent herein:

***"General Conditions or directions:***

1. *In view of our discussion in the main Judgment, we are of the considered view that the fixation of distance from water bodies (lakes and Rajkalewas) suffers from the inbuilt contradiction, legal infirmity and is without any scientific justification. The RMP - 2015 provides 50m from middle of the Rajkalewas as buffer zone in the case of primary Rajkalewas, 25m in the case of secondary Rajkulewas and 15m in the tertiary Rajkulewas in contradiction to the 30m in the case of lake which is*



certainly much bigger water body and its utility as a water body/wetland is well known certainly part of wet land. Thus, we direct that the distance in the case of Respondents Nos. 9 and 10 from Rajkulewas, Waterbodies and wetlands shall be maintained as below: -

- (i) In the case of Lakes, 75m from the periphery of water body to be maintained as green belt and buffer zone for all the existing water bodies i.e., lakes/wetlands.

**[It is pertinent to note that the rest of the city of Bengaluru has to maintain a distance of 30m from the periphery of water body.] (comment in square brackets added by us)**

- (ii) 50m from the edge of the primary Rajkulewas.

**[It is pertinent to note that the rest of the city of Bengaluru has to maintain a distance of 50m from the middle of Rajkulewas and not from the edge of primary Rajkulewas.] (comment in square brackets added by us)**

- (iii) 35m from the edges in the case of secondary Rajkulewas.

**It is pertinent to note that the rest of the city of Bengaluru has to maintain a distance of 25m from the middle of Rajkulewas and not from the edge of secondary Rajkulewas.] (comment in square brackets added by us)**

- (iv) 25m from the edges in the case of tertiary Rajkulewas. This buffer/green zone would be treated as no construction zone for all intent and purposes. This is absolutely essential for the purposes of sustainable development particularly keeping in mind the ecology and environment of the areas in question. All the offending constructions raised by Respondents Nos. 9 and 10 of any kind including boundary wall shall be demolished which falls within such areas. Wherever necessary dredging operations are required, the same should be carried out to restore the original capacity of the water spread area and/or wetlands. Not only the existing construction would be removed but also none of these Respondents - Project Proponent would be permitted to raise any construction in this zone.

**[It is pertinent to note that the rest of the city of Bengaluru has to maintain a distance of 15m from the middle of Rajkulewas and not from the edge of**



tertiary Rajkulewas.] (comment in square brackets added by us)

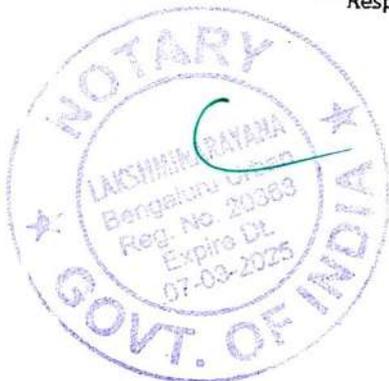
All authorities particularly Lake development Authority shall carry out this operation in respect of all the water bodies / lakes of Bangalore.

2. The capacity of the existing STPs to treat sewage is 729 MLD, whereas another 500 MLD sewage is proposed to be treated in 10 upcoming STPs. In this context, all the STPs operating in the area whether Government or privately owned, should meet the revised standards notified by CPCB/MoEF.
3. Bangalore city receives treated potable water of 1360 MLD from river Cauvery whereas the requirement is for another 750 MLD and the entire area falls in critical zone in terms of ground water exploitation. Information reveals that only one million litre per month of STP treated water is used by builders for construction purposes. For this reason, the BWSSB issues partial NQC to various residential and commercial projects in respect of supply of potable water. In this context, following directions need to be issued:
  - i. At the time of grant of EC, the water requirement for the construction phase and operation phase should be considered separately. Due consideration should also be given for identification of source of supply of water and this should be a prerequisite for grant of EC.
  - ii. All the project proponents should necessarily use only treated sewage water for construction purpose and this should be reflected in EC as a condition for construction phase.
  - iii. Wherever the quality of treated sewage water does not conform to the quality needed for construction, necessary upgradation in STP should be undertaken immediately.

**Specific Conditions/ Directions for Respondent 9<sup>1</sup>(or the Project Proponent herein.)**

In addition to the above directions which should be equally part of EC condition in respect of respondents nos. 9 & 10, following specific conditions shall apply to respondent no. 9:

<sup>1</sup> Respondent no. 9 is Mantri Techzone Pvt Limited.



- i. *Reclaimed area of the lake to the extent of 3 acres 10 guntas in survey No. 43 should be restored to its original condition at the cost of project proponent. The possession of this area should be restored by Respondent No. 9 to the concerned Authorities immediately. In addition, a buffer zone of 75 m should be provided between the lake and the project area and this should be maintained as green area.*
- ii. *In the remaining area, where primary Rajkalewa is abutting the project area, 50 m buffer zone on the side of the project area from the edge of the rajkalewa should be maintained as green belt.*
- iii. *Several irrigation canals or tertiary rajkalewas taking off from the Agara tank were passing through the area of respondent No. 9, and serve the dual purpose of irrigating paddy fields and disposal of surface run off (storm water drains) during rainy season. However, on account of the activities of the project, these drains have been totally obliterated. For the purpose of proper disposal of storm runoff from the entire area falling between the Agara lake and the Belandur Lake, respondent No. 9 must provide required number of storm water drains based on proper hydrological study. These storm drains should have a buffer zone of 15 m on either bank maintained as green belt.*
- iv. *The cumulative quantity of earth excavated for the construction of project is around 4 lakhs cubic meters in the depth range of 0 to 9 meters. This has created huge hillock like structure obstructing the natural flow pattern of surface runoff from Agara Lake side to Balendur Lake side or primary Rajkalewas. For this purpose, during construction phase garland drain should be constructed around the existing dumping site for safe disposal of runoff to the Rajkalewas. For the disposal of excavated material, a proper muck disposal plan duly approved by SIEAA shall be prepared. In any case the plan should ensure that no muck/sediment flows into Rajkalewas and/or Belandur lake.*
- v. *The Kharab land identified by Revenue Dept. admeasuring 1 acre 2 guntas should be demarcated and maintained separately as green belt.*
- vi. *The entire green belt created under the directions of this Tribunal should not to be considered as part of green belt*

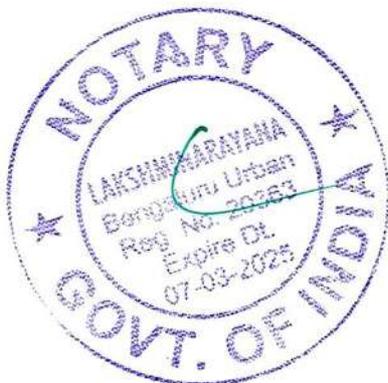


of the project as part of EC condition and will be over and above the green belt as indicated in the EC.

- vii. In view of the heavy traffic load in the adjoining Sarjapur road, a proper study on the basis of traffic density, foot falls expected, etc., a proper plan needs to be prepared and the concept of service road exclusively for the project needs to be worked out and additional parking space created within the project area and incorporated as a part of the overall project layout, within a period of 3 months.
10. Though, at the time of hearing prior to passing the judgment, we had heard the parties on all aspects but still we have provided re-hearing to the parties on all issues with emphasis on imposition of environmental compensation including the quantum. Upon hearing, we are of the considered view that environmental compensation imposed upon Respondent No. 9 calls for no variation and the Respondent No. 9 should be called upon to pay the said amount of Rs. 117.35 Crores determined under the judgment prior to commencement of any project activity at the site. Respondent No. 10 has not commenced any actual construction activity but has carried out various preparatory steps including excavation and deposition of huge earth by creating a hillock at the premises in question and a site office. Thus, considering cumulative effect on environment and ecology due to various breaches in that behalf by Respondent No. 10 and the fact that the remedial measures can more effectively be taken by the Respondent No.10, we reduce environmental compensation payable by Respondent No. 10 to Rs. 13.5 crores (3% of the stated project cost instead of 5% as imposed in the original judgment). **(emphasis supplied by us)**

**General Directions:**

1. We direct SEIAA, Karnataka to issue amended order granting Environmental Clearance within four weeks from today incorporating all the conditions stated in this judgement and such other conditions as it may deem appropriate in light of this judgment and Inspection Note of the Expert Members. The Project Proponents would be permitted to commence activity only after issuance of amended Environmental Clearance order.
2. SEIAA Karnataka and MoEF shall ensure regular supervision and monitoring of the project and during the



construction and even upon completion to ensure that activity is carried out strictly in accordance with the conditions of the order granting Environmental Clearance, this Judgment, Notification of 2006 and other laws in force.

3. The distances in respect of buffer zone specified in this judgment shall be made applicable to all the projects and all the Authorities concerned are directed to incorporate such conditions in the projects to whom Environmental Clearance and other permissions are now granted not only around Belandur Lake, Rajkulewas, Agara Lake, but also all other Lakes/wetlands in the city of Bengaluru.
4. We hereby direct the State of Karnataka to submit a proposal to the MoEF for demarcating wetlands in terms of Wetland Rules 2010 as revised from time to time. Such proposal shall be submitted by the State within four weeks from today and the MoEF shall consider the same in accordance with law and grant its approval or otherwise within four weeks thereafter. After such approval is granted by MoEF, the State would issue notification notifying such areas immediately thereafter in accordance with Rules and law.
5. Both the Respondents Nos. 9 and 10 shall ensure that debris or any construction material that has been dumped into the Rajkulewas, or on their Banks and on the buffer zone of wetlands should be removed within four weeks from today. In the event they fail to do so, the same shall be removed by the Lake Development Authority along with the State Administration and recover charges thereof from the said Respondents.
6. There is a serious discrepancy even in regard to the measurement of land as far as Respondent No. 9 is concerned. Admittedly the Respondent has been allotted and is in possession of land admeasuring 63.94 acres, though Environmental Clearance has been granted for 2,92,636.03 Sq. Meters which is equivalent to 72.22 acres. For this reason alone, Environmental Clearance cannot be given effect to. While issuing the amended Environmental Clearance, SEIAA Karnataka shall take into consideration all these aspects and, if necessary, would require Respondent No. 9 to submit a fresh layout plant and the entire project may be revised in accordance with law.
7. Both the Respondents (Project Proponents) shall submit an appropriate plan in view of the conditions imposed in this



*judgment and the amended Environmental Clearance that would be issued.*

8. *The amount of environmental compensation will be deposited prior to issuance of amended Environmental Clearance.*

*With the above directions, the Original Application No. 222 of 2014 and Misc. Applications Nos. 596/2016 and 603/2016 are finally disposed of while leaving the parties to bear their own costs."*

5. That thereafter, the above-referred order was challenged inter alia by the Project Proponent before the Hon'ble Supreme Court vide Civil Appeal No. 5016 of 2016. Vide final Judgment and Order dated 5.3.2019, the Hon'ble Supreme Court while upholding the Judgment of the Hon'ble National Green Tribunal had passed the following directions, upheld the directions of the Hon'ble National Green Tribunal and disposed the Civil Appeal No. 5016 of 2016:

*"60. The State of Karnataka is aggrieved by the following offending portion of the order dated 04.05.2016:*

*"1. In view of our discussion in the main Judgment, we are of the considered view that the fixation of distance from water bodies (lakes and Rajkalewas) suffers from the inbuilt contradiction, legal infirmity and is without any scientific justification. The RMP - 2015 provides 50m from middle of the Rajkalewas as buffer zone in the case of primary Rajkalewas, 25m in the case of secondary Rajkulewas and 15m in the tertiary Rajkulewas in contradiction to the 30m in the case of lake which is certainly much bigger water body and its utility as a water body/wetland is well known certainly part of wet land. Thus, we direct that the distance in the case of Respondents Nos. 9 and 10 from Rajkulewas, Waterbodies and wetlands shall be maintained as below:-*

*(i) In the case of Lakes, 75m from the periphery of water body to be maintained as green belt and buffer zone for all the existing water bodies i.e. lakes/wetlands.*

*(ii) 50m from the edge of the primary Rajkulewas.*

*(iii) 35m from the edges in the case of secondary Rajkulewas*

*(iv) 25m from the edges in the case of tertiary Rajkulewas*

*This buffer/green zone would be treated as no construction zone for all intent and purposes. This is absolutely essential for the purposes of sustainable development particularly keeping in mind the ecology and environment of the areas in question.*



- a. It was directed that reclaimed area of the lake to the extent of 3 acres 10 guntas in survey No. 43 should be restored to its original condition at the cost of Project Proponent. As a matter of fact, the Project Proponent was not holding an extent of 3 acres 10 guntas of land in survey no. 43 and the same was intimated in writing to KIADB, State Government and Karnataka Lake Conservation and Development Authority (KLCDA). KLCDA has filed an Affidavit dated 27.07.2017 to the Hon'ble Tribunal that the extent of 3 acres 10 guntas of land in Survey No.43 does not belong to MTPL and the BDA has taken possession of the said land. KLCDA has marked 75m buffer zone as per the NGT's directions. A copy of the Affidavit filed by the KLCDA is annexed herewith as **Annexure-13**. **Therefore, this condition stands complied.**
- b. It was also directed that the green belt to be created in accordance with directions of the Court would have to be in addition to the green belt that has already been created as part of the Environment Clearance conditions. The Project Proponent has already kept green belt as per norms of MoEF as stipulated in the Environment Clearance. Placing a further requirement to maintain an additional green belt over and above the existing green belt, would not only not serve any tangible purpose but also render the entire project unviable. **We therefore, request you to kindly reduce the requirement of the Green Belt in the EC to the extent the additional Green Belt being created under the order of the Hon'ble Supreme Court.**
- c. It was also directed that a distance of 50m from the edge of the primary Rajkulewas; a distance of 35m from the edges in the case of secondary Rajkulewas; and a distance 25m from the edges in the case of tertiary Rajkulewas would have to be maintained by the project as a no construction zone. It is submitted that we are ready and willing to comply with these conditions provided the Rajkulewas, particularly the tertiary Rajkulewas actually exist on the site. We have not found any such Rajkulewas. We therefore, request the SEIAA that it's team visit the site and carry out necessary identification and demarcation of the said primary, secondary and tertiary Rajkulewas as on the site and not in the decades old revenue maps, so as to enable us to comply with this condition. If no such



Rajkulewas are identified by the SEIAA team, this condition may be done away with.

8. Condition no. (iv) of the Specific Conditions issued by the Ld. National Green Tribunal is particularly relevant and extracted hereinbelow:

*"iv. The cumulative quantity of earth excavated for the construction of project is around 4 lakhs cubic meters in the depth range of 0 to 9 meters. This has created huge hillock like structure obstructing the natural flow pattern of surface runoff from Agara Lake side to Belandur Lake side or primary Rajkalewas. For this purpose, during construction phase garland drain should be constructed around the existing dumping site for safe disposal of runoff to the Rajkalewas. For the disposal of excavated material, a proper muck disposal plan duly approved by SIEAA shall be prepared. In any case the plan should ensure that no muck/sediment flows into Rajkalewas and/or Belandur lake."*

It is respectfully submitted that there is no hillock-like structure obstructing the natural flow pattern of surface runoff from Agara lake side to Bellandur lake side or primary rajkalewas. Therefore, the question of construction of a garland drain and disposal of the excavated site material as noted in the condition extracted above does not arise. The SEIAA may kindly have the same verified through a site inspection for the reason that the above said condition no. iv. is not capable of compliance in the absence of the existence of the hillock as mentioned in the said condition.

9. As submitted above, the Project Proponent has complied with all conditions except those cited in this representation as being incapable of compliance - namely the green belt, distance from tertiary rajakaluwe and the creation of a garland drain. However, what was within the control and power of the Project Proponent and what was possible without affecting third party lands and rights have been complied with or undertaken to be complied with by the Project Proponent. However, to pay the exorbitant environmental compensation in one instalment as a pre-requisite to the issuance of an amended Environmental Clearance certificate, will sound the death knell on the Project Proponent financially. In view of this, by this representation, it is requested that the direction to pay the environmental compensation as a pre-requisite to restarting implementation of the project may be relaxed and instead the Project Proponent may be permitted to pay the environmental compensation of Rs.117.35 crore over a period of ten years, in instalments with no interest.



The Project Proponent will be ready to pay the first instalment prior to the commencement of any construction work of the project. The Rs. 117.35 Crore compensation directed to be paid by the Project Proponent by the National Green Tribunal and the Hon'ble Supreme Court is stated to be 5 % of the project cost. Given the losses already suffered by the Project Proponent and given the drastic reduction in the land available for the project-development and the various other compromises that the Project Proponent has had to make in its original plan in view of the Judgements of the Hon'ble National Green Tribunal and the Hon'ble Supreme Court, this amount of compensation payable may kindly be reduced to 1 % of the project cost which is Rs 23,40,00,000/- (Twenty Three Crores and Forty Lacs Only) instead of 5%.

10. The Project Proponent has suffered huge losses due to the delay in implementation of this project. Besides, its business has heavily suffered losses due to the general recession in the economy and particularly the recession in the real-estate sector. These hardships have only been compounded by the ongoing COVID-19 pandemic. It further bears mention that if the Project Proponent were to be compelled, despite not having the means to pay this enormous environmental compensation as a lump-sum, the entire project would come to a standstill resulting in a cascading effect on the various consumers who have invested in the Project Proponent's project, thus causing them immense financial harm and distress.
11. As submitted earlier, the Project Proponent has already restored an area of 3 acres 10 guntas in Survey No. 43 to the concerned authorities, in accordance with the directions of the Tribunal and the Hon'ble Supreme Court of India and intends to fully comply with all the compliable directions of the Hon'ble Supreme Court. To establish its *bona fides*, the Project Proponent is willing to undertake to not sell built-up area of equivalent market value till the imposed environmental compensation is fully paid. As and when instalments are paid towards the said environmental compensation, proportionate built-up area must be released on a pro-rata basis.
12. The Project Proponent further submits that taking a revised EC and getting the plans sanctioned de novo would take a minimum of 12 to 15 months. This additional delay would make the project completely unviable. The Project Proponent therefore prays that the condition of fresh EC and building plans may be done away with and the Project Proponent be allowed to resume the project work with existing EC and building plans and the Project Proponent will undertake to abide by the compliable conditions prescribed in the judgments of the Hon'ble



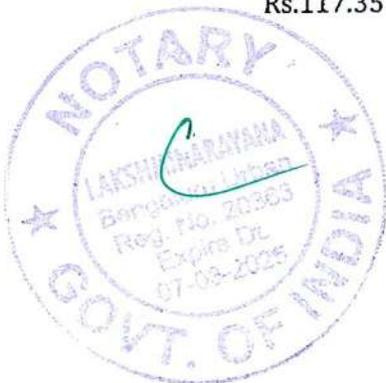
Rajkulewas are identified by the SEIAA team, this condition may be done away with.

8. Condition no. (iv) of the Specific Conditions issued by the Ld. National Green Tribunal is particularly relevant and extracted hereinbelow:

*"iv. The cumulative quantity of earth excavated for the construction of project is around 4 lakhs cubic meters in the depth range of 0 to 9 meters. This has created huge hillock like structure obstructing the natural flow pattern of surface runoff from Agara Lake side to Belandur Lake side or primary Rajkalewas. For this purpose, during construction phase garland drain should be constructed around the existing dumping site for safe disposal of runoff to the Rajkalewas. For the disposal of excavated material, a proper muck disposal plan duly approved by SEIAA shall be prepared. In any case the plan should ensure that no muck/sediment flows into Rajkalewas and/or Belandur lake."*

It is respectfully submitted that there is no hillock-like structure obstructing the natural flow pattern of surface runoff from Agara lake side to Bellandur lake side or primary rajkalewas. Therefore, the question of construction of a garland drain and disposal of the excavated site material as noted in the condition extracted above does not arise. The SEIAA may kindly have the same verified through a site inspection for the reason that the above said condition no. iv. is not capable of compliance in the absence of the existence of the hillock as mentioned in the said condition.

9. As submitted above, the Project Proponent has complied with all conditions except those cited in this representation as being incapable of compliance - namely the green belt, distance from tertiary rajakaluwe and the creation of a garland drain. However, what was within the control and power of the Project Proponent and what was possible without affecting third party lands and rights have been complied with or undertaken to be complied with by the Project Proponent. However, to pay the exorbitant environmental compensation in one instalment as a pre-requisite to the issuance of an amended Environmental Clearance certificate, will sound the death knell on the Project Proponent financially. In view of this, by this representation, it is requested that the direction to pay the environmental compensation as a pre-requisite to restarting implementation of the project may be relaxed and instead the Project Proponent may be permitted to pay the environmental compensation of Rs.117.35 crore over a period of ten years, in instalments with no interest.

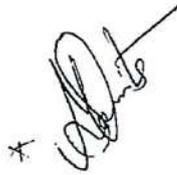


National Green Tribunal and the Hon'ble Supreme Court. The Project Proponent further prays that the validity of the original EC and the building plans may be extended for further period of 7 years from the date of the resumption of the project work.

13. Apart from the above, the Project Proponent is willing to comply with all directions issued by the Tribunal and sustained by the Hon'ble Supreme Court of India. However, such compliance will not be possible unless the SEIAA grants an extension of the Environmental Clearance as prayed hereinabove.

Yours sincerely,

For M/s Mantri Techzone Pvt. Ltd.



**Moumita Som**  
**Head -Design**

**Encl:** As mentioned above.



THIS COPY TESTED BY ME  
*Lakshminarayana* 02/03/2024  
LAKSHMINARAYANA  
Advocate & Notary Public  
GOVT OF INDIA  
# 15, 1st Main, 2nd Cross  
near Impact College, Amco Layout, K. dige: 608  
Bengaluru Urban, Karnataka .-300017

# 410

Ref: MTPL/DD/001/2023-24

Date: 19-05-2023



mantri

To,

**The Member Secretary**

The State Environment Impact Assessment Authority (SEIAA)  
Forest, Ecology & Environment Department,  
M. S. Building, Bangalore-560001

Sir/Madam,

**Sub:** Reminder to expedite on our application dated 24-03-2021 for extension of validity to environmental clearance issued on 17-02-2012.

**Ref.No.:** 1. Environmental clearance letter no. SEIAA: 30: CON: 2011 dt.17-02-2012  
2. Application for EC extension to SEIAA dt. 24-03-2021

1. With reference to above cited subject, we have obtained the environmental clearance with vide no. SEIAA: 30: CON 2011 dt. 17-02-2012 (Ref.no.1).
2. Further, we have requested to issue Environmental Clearance extension in our application dt 24-03-2021. As on today we are waiting for your response, after issuance of Environment clearance extension from SEIAA, we will comply with all directions issued by the Tribunal and sustained by the Hon'ble Supreme Court of India. However, such compliance will not be possible unless the SEIAA grants an extension of the Environmental Clearance as prayed hereinabove.
3. With the above, we are requesting you to expedite our application dt. 24-03-2021 at the earliest.

Thanking You,

Yours Faithfully,

M/s Mantri Techzone Pvt. Ltd.

MOUMITA SOM  
Authorized Signatory

Encl: As mentioned above

RK797767463IN IVR:8275797767463

RL MUSEUM ROAD S.D <560025>

Counter No:2.20/05/2023.14:45

To:MEMBER SECRETARY..

PIN:560001. Bengaluru G.P.O.

From:MANTRI DEVELOPER..

Wt:75gms

Amt:40.00(Cash)

<Track on [www.india.gov.in](http://www.india.gov.in)>

भारतीय डाक



India Post



Mantri Techzone Private Limited  
CIN : U45201KA2003PTC033023

Mantri House, III Vittal Mallya Road  
Bangalore-560001

T +91 80 4130 0000  
F +91 80 4132 5000

[www.mantri.in](http://www.mantri.in)

Handwritten: 02/03/2024  
LAKSHMINARAYANA  
Advocate & Notary Public  
GOVT OF INDIA  
# 15, 1st Main, 2nd Cross  
near Impact College, Amco Layout, K. digeshwar  
Bengaluru Urban, Karnataka - 560092

# 411

Ref: MTPL/DD/003/2023-24  
Date: 02-09-2023



To,

**The Member Secretary**

The State Environment Impact Assessment Authority (SEIAA)  
Forest, Ecology & Environment Department,  
M. S. Building, Bangalore-560001

Sir/Madam,

**Sub:** Reminder to expedite on our application dated 24-03-2021 for extension of validity to environmental clearance issued on 17-02-2012.

**Ref.No.:** 1. Environmental clearance letter no. SEIAA: 30: CON: 2011 dt.17-02-2012  
2. Application for EC extension to SEIAA dt. 24-03-2021  
3. Reminder letter to issue EC extension dt. 20-05-2023

1. With reference to above cited subject, we have obtained the environmental clearance with vide no. SEIAA: 30: CON 2011 dt. 17-02-2012 (Ref.no.1).
2. Further, we have requested to issue Environmental Clearance extension in our application dt 24-03-2021. As on today we are waiting for your response, after issuance of Environment clearance extension from SEIAA, we will comply with all directions issued by the Tribunal and sustained by the Hon'ble Supreme Court of India. However, such compliance will not be possible unless the SEIAA grants an extension of the Environmental Clearance as prayed hereinabove.
3. On the same, we have requested to issue the EC extension for the above said project on 20-05-2023. Same is enclosed for your reference.
4. With the above, again we are requesting you to expedite our application dt. 24-03-2021 at the earliest.

Thanking You,

Yours Faithfully,

**M/s Mantri Techzone Pvt. Ltd.**

*Asha B.R.*

**Authorized Signatory**

**Encl:** As mentioned above

RK4282800068IN IVR:82754282800068 भारतीय डाक  
RI. MUSEUM ROAD S.O (560025)  
Counter No:3.02/09/2023.15:07  
To:THE MEMBERSECRETARY.,  
PIN:560001, Bengaluru G.P.O.  
From:ASHA B R.BG  
Wi:25ans  
Amt:30.00(Cash)  
(Track on www.indiapost.gov.in)



**Mantri Techzone Private Limited**  
CIN : U45201KA2003PTC033023

**TRUE COPY ATTESTED BY ME**  
*Asha B.R.* 02/03/2024  
**LAKSHMINARAYANA**  
Advocate & Notary Public  
GOVT OF INDIA  
# 15, 1st Main, 2nd Cross  
near Impact College, Anco Layout, K. digenahalli  
Bengaluru Urban, Karnataka - 560097

T +91 80 4130 0000 www.mantri.in  
F +91 80 4132 5000

# 412

Ref: MTPL/DD/006/2023-24  
Date: 09-10-2023



**MANTRI**

To,

**The Member Secretary**

The State Environment Impact Assessment Authority (SEIAA)  
Forest, Ecology & Environment Department,  
M. S. Building, Bangalore-560001

Sir/Madam,

**Sub:** Reminder to expedite on our application dated 24-03-2021 for extension of validity to environmental clearance issued on 17-02-2012.

**Ref.No.:** 1. Environmental clearance letter no. SEIAA: 30: CON: 2011 dt.17-02-2012  
2. Application for EC extension to SEIAA dt. 24-03-2021  
3. Reminder letter to issue EC extension dt. 20-05-2023  
4. MTPL letter to issue EC extension dt. 02-09-2023

1. With reference to above cited subject, we have obtained the environmental clearance with vide no. SEIAA: 30: CON 2011 dt. 17-02-2012 (Ref.no.1).
2. Further, we have requested to issue Environmental Clearance extension in our application dt 24-03-2021. As on today we are waiting for your response, after issuance of Environment clearance extension from SEIAA, we will comply with all directions issued by the Tribunal and sustained by the Hon'ble Supreme Court of India. However, such compliance will not be possible unless the SEIAA grants an extension of the Environmental Clearance as prayed hereinabove.
3. On the same, we have requested again to issue the EC extension for the above said project on 02-09-2023. Same is enclosed for your reference.
4. With the above, again we are requesting you to expedite our application dt. 24-03-2021 at the earliest.

Thanking You,

Yours Faithfully,

**M/s Mantri Techzone Pvt. Ltd.**

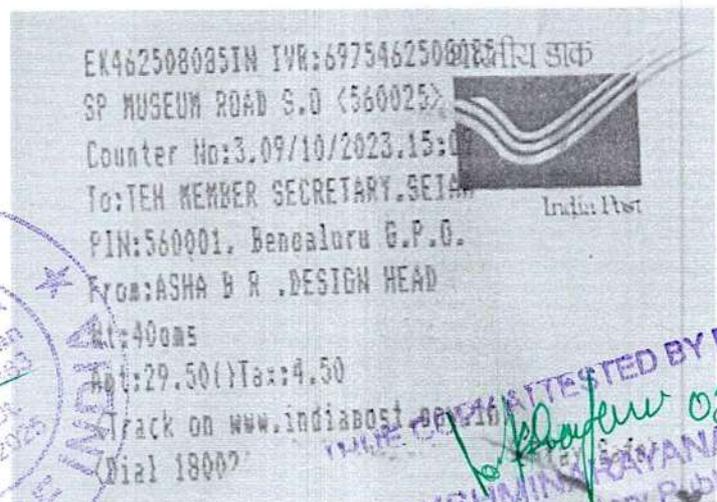
*Asha B.R.*

**Authorized Signatory**

**Encl:** As mentioned above

**Mantri Techzone Private Limited**  
CIN : U45201KA2003PTC033023

Mantri House, 41 Vittal Mallya Road  
Bangalore 560001



**TESTED BY MF**  
*02/03/2024*  
**LAKSHMINARAYANA**  
Govt. & Notary Public  
www.mantri.in  
# 15, 1st Main, 2nd Cross  
near Impact College, Amco Layout, K. digambar  
Bangalore Urban, Karnataka -560007

# 413

Ref: MTPL/DD/007/2023-24

Date: 06-11-2023



mantri

To,

**The Member Secretary**

The State Environment Impact Assessment Authority (SEIAA)  
Forest, Ecology & Environment Department,  
M. S. Building, Bangalore-560001

Sir/Madam,

**Sub:** Reminder to expedite on our application dated 24-03-2021 for extension of validity to environmental clearance issued on 17-02-2012.

**Ref.No.:** 1. Environmental clearance letter no. SEIAA: 30: CON: 2011 dt.17-02-2012  
2. Application for EC extension to SEIAA dt. 24-03-2021  
3. Reminder letter to issue EC extension dt. 20-05-2023  
4. MTPL letter to issue EC extension dt. 02-09-2023  
5. MTPL letter to issue EC extension dt. 09-10-2023

1. With reference to above cited subject, we have obtained the environmental clearance with vide no. SEIAA: 30: CON 2011 dt. 17-02-2012 (Ref.no.1).
2. Further, we have requested to issue Environmental Clearance extension in our application dt 24-03-2021. As on today we are waiting for your response, after issuance of Environment clearance extension from SEIAA, we will comply with all directions issued by the Tribunal and sustained by the Hon'ble Supreme Court of India. However, such compliance will not be possible unless the SEIAA grants an extension of the Environmental Clearance as prayed hereinabove.
3. On the same, we have requested again to issue the EC extension for the above said project on 09-10-2023. Same is enclosed for your reference.
4. With the above, again we are requesting you to expedite our application dt. 24-03-2021 at the earliest.

Thanking You,

Yours Faithfully,

**M/s Mantri Techzone Pvt. Ltd.**

*Asha B.R.*

**Authorized Signatory**

**Encl:** As mentioned above

**Mantri Techzone Private Limited**  
CIN : U45201KA2003PTC033023

RK7259991549IM IVR:02757259991549

RL AUSTIN TOWN S.O (560047)

Counter No:1,06/11/2023,11:53

To:THE MEMBER SE,THE STATE ENVIRO

PIN:560001, Bengaluru G.P.O.

From:ASHA DR,41 VITTAL MALLYA

Wt:200ms Ack Fee:3.00,REG=17.0

Am:29.50(Cash)Tax:4.50

(Track on [www.indiapost.gov.in](http://www.indiapost.gov.in))

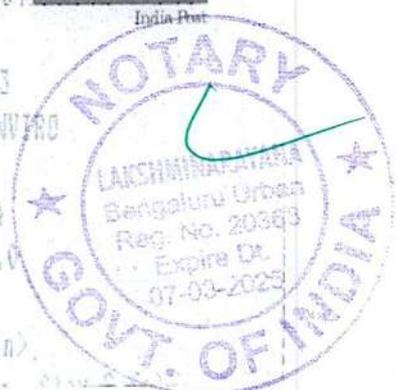
Mantri House, 41 Vittal Maliya Road

Bangalore 560001

T +91 80 4130 0000

F +91 80 4132 5000

India Post



**COPIES ATTESTED BY ME**  
*Lakshminarayana*  
**LAKSHMINARAYANA**  
Advocate & Notary Public  
GOVT OF INDIA  
# 15, 1st Main, 2nd Cross  
near Impact College, Amco Layout, K- digenahalli  
Bengaluru Urban, Karnataka 560092

[www.mantri.in](http://www.mantri.in)

# 414

Ref: MTPL/DD/009/2023-24  
Date: 02-12-2023



mantri

To,

**The Member Secretary**

The State Environment Impact Assessment Authority (SEIAA)  
Forest, Ecology & Environment Department,  
M. S. Building, Bangalore-560001

Sir/Madam,

**Sub:** Reminder to expedite on our application dated 24-03-2021 for extension of validity to environmental clearance issued on 17-02-2012.

**Ref.No.:** 1. Environmental clearance letter no. SEIAA: 30: CON: 2011 dt.17-02-2012  
2. Application for EC extension to SEIAA dt. 24-03-2021  
3. MTPL letter to issue EC extension dt. 06-11-2023

1. With reference to above cited subject, we have obtained the environmental clearance with vide no. SEIAA: 30: CON 2011 dt. 17-02-2012 (Ref.no.1).
2. Further, we have requested to issue Environmental Clearance extension in our application dt 24-03-2021. As on today we are waiting for your response, after issuance of Environment clearance extension from SEIAA, we will comply with all directions issued by the Tribunal and sustained by the Hon'ble Supreme Court of India. However, such compliance will not be possible unless the SEIAA grants an extension of the Environmental Clearance as prayed hereinabove.
3. On the same, we have requested again to issue the EC extension for the above said project on 06-11-2023. Same is enclosed for your reference.
4. With the above, again we are requesting you to expedite our application dt. 24-03-2021 at the earliest.

Thanking You,

Yours Faithfully,

M/s Mantri Techzone Pvt. Ltd.

*Asha B.R.*

Authorized Signatory

Encl: As mentioned above

RK453088288IN IVR:8275453088288

RL MUSEUM ROAD S.O <560025>

Counter No:4,02/12/2023,12:01

To:THE MEMBER AND SECRETORY,.

PIN:560001, Bengaluru G.F.O.

From:ASHA BR.,.

Wt:20oms Ack Fee:3.00,REG=17.0

Amt:29.50(Cash)Tax:4.50

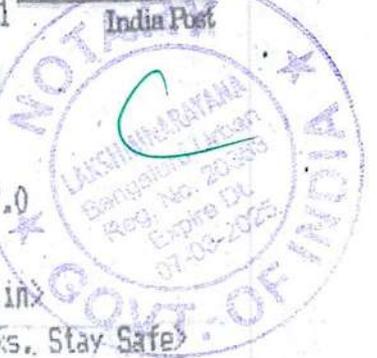
<Track on [www.indiapost.gov.in](http://www.indiapost.gov.in)>

<Dial 18002666868> <Wear Masks. Stay Safe>

भारतीय डाक



India Post



Mantri Techzone Private Limited  
CIN : U45201KA2003PTC033023

TRUSTED COPY ATTESTED BY MF  
Mantri House, 41 Vittal Mallya Road  
Bangalore 560001

*02/03/2024*  
LAKSHMINARAYANA  
Advocate & Notary Public  
GOVT OF INDIA  
# 15, 1st Main, 2nd Cross  
near Impact College, Anco Layout, K. diganahalli  
Bengaluru Urban, Karnataka - 560022

T +91 80 4130 0000 www.mantri.in  
F +91 80 4132 5000

# 415

Ref: MTPL/DD/011/2023-24

Date: 05-01-2024



**mantri**

To,

**The Member Secretary**

The State Environment Impact Assessment Authority (SEIAA)  
Forest, Ecology & Environment Department,  
M. S. Building, Bangalore-560001

Sir/Madam,

**Sub:** Reminder to expedite on our application dated 24-03-2021 for extension of validity to environmental clearance issued on 17-02-2012.

- Ref.No.:**
1. Environmental clearance letter no. SEIAA: 30: CON: 2011 dt.17-02-2012
  2. Application for EC extension to SEIAA dt. 24-03-2021
  3. Reminder letter to Issue EC extension dt. 20-05-2023
  4. MTPL letter to issue EC extension dt. 02-09-2023
  5. MTPL letter to issue EC extension dt. 09-10-2023
  6. MTPL letter to issue EC extension dt. 06-11-2023
  7. MTPL letter to issue EC extension dt. 02-12-2023

1. With reference to above cited subject, we have obtained the environmental clearance with vide no. SEIAA: 30: CON 2011 dt. 17-02-2012 (Ref.no.1).
2. Further, we have requested to issue Environmental Clearance extension in our application dt 24-03-2021. As on today we are waiting for your response, after issuance of Environment clearance extension from SEIAA, we will comply with all directions issued by the Tribunal and sustained by the Hon'ble Supreme Court of India. However, such compliance will not be possible unless the SEIAA grants an extension of the Environmental Clearance as prayed hereinabove.
3. On the same, we have requested again to issue the EC extension for the above said project on 02-12-2023. Same is enclosed for your reference.
4. With the above, again we are requesting you to expedite our application dt. 24-03-2021 at the earliest.

Thanking You,

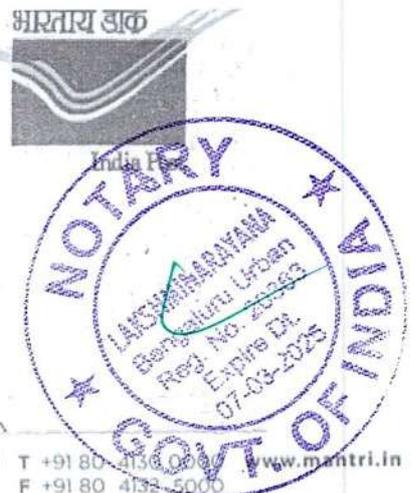
Yours Faithfully,

**M/s Mantri Techzone Pvt. Ltd.**

*Asha B. R.*  
**Authorized Signatory**

भारतीय डाक  
India Post

RK490448572IN IVR:0275490448572  
RL MUSEUM ROAD S.D (560025)  
Counter No:4.05/01/2024.10:09  
To:THE MEMBER SECRETARY,SEIAA  
PIN:560001, Bengaluru G.P.O.  
From:MANTRI DEVELOPERS P LTD.,  
200ms Ack Fee:3.00,REG=17.0  
Amt:29.50(Cash)Tax:4.50



**Mantri Techzone Pvt. Limited**  
CIN : U45201KA2003PTCO33023

Mantri House, 41 Vittal Mallya Road  
Bangalore 560001

T +91 80 4132 0000 www.mantri.in  
F +91 80 4132 6000

**NOTARY ATTESTED BY ME**  
*Lakshminarayana*  
**LAKSHMINARAYANA**  
Advocate & Notary Public  
GOVT OF INDIA  
# 15, 1st Main, 2nd Cross  
near Impact College, Amco Layout, K. diganahalli  
Bengaluru Urban, Karnataka - 560092

# 416

Ref: MTPL/DD/013/2023-24

Date: 03-02-2024



mantri

To,

**The Member Secretary**

The State Environment Impact Assessment Authority (SEIAA)  
Forest, Ecology & Environment Department,  
M. S. Building, Bangalore-560001

Sir/Madam,

**Sub:** Reminder to expedite on our application dated 24-03-2021 for extension of validity to environmental clearance issued on 17-02-2012.

- Ref.No.:**
1. Environmental clearance letter no. SEIAA: 30: CON: 2011 dt.17-02-2012
  2. Application for EC extension to SEIAA dt. 24-03-2021
  3. Reminder letter to issue EC extension dt. 20-05-2023
  4. MTPL letter to issue EC extension dt. 02-09-2023
  5. MTPL letter to issue EC extension dt. 09-10-2023
  6. MTPL letter to issue EC extension dt. 06-11-2023
  7. MTPL letter to issue EC extension dt. 02-12-2023
  8. MTPL letter to issue EC extension dt. 05-01-2024

1. With reference to above cited subject, we have obtained the environmental clearance with vide no. SEIAA: 30: CON 2011 dt. 17-02-2012 (Ref.no.1).
2. Further, we have requested to issue Environmental Clearance extension in our application dt 24-03-2021. As on today we are waiting for your response, after issuance of Environment clearance extension from SEIAA, we will comply with all directions issued by the Tribunal and sustained by the Hon'ble Supreme Court of India. However, such compliance will not be possible unless the SEIAA grants an extension of the Environmental Clearance as prayed hereinabove.
3. On the same, we have requested again to issue the EC extension for the above said project on 05-01-2024. Same is enclosed for your reference.
4. With the above, again we are requesting you to expedite our application dt. 24-03-2021 at the earliest.

Thanking You,

Yours Faithfully,

**M/s Mantri Techzone Pvt. Ltd.**

For,  
*Manika*

**Authorized Signatory**

Encl: As mentioned above

**Mantri Techzone Private Limited**

CIN : U45201KA2003PTC033023

RK465771287IN IVR:8275465771287

RL MUSEUM ROAD S.O <560025>

Counter No:3,03/02/2024,10:59

To:THE MEMBER SECR SEIAA,,

PIN:560001, Bengaluru G.P.O.

From:MR ADAM SAB,,

Wt:20000, Amt Fee:3.00,REG=17.0

Amt:29.50(Cash)Tax:4.50

Track on [www.indianpost.gov.in](http://www.indianpost.gov.in)

भारतीय डाक

India Post



TRUE COPY ATTESTED BY

*02/03/2024*  
**LAKSHMINARAYANA**

Advocate & Notary Public

GOVT OF INDIA

# 15, 1st Main, 2nd Cross

near impact College, Amco Layout, K. digonahalli  
Bengaluru Urban, Karnataka - 560092

Mantri House, 41 Vittal Mallya Road

Bangalore-560001

T +91 80 4130 9000

F +91 80 4132 5000

[www.mantri.in](http://www.mantri.in)

# 417

# ANNEXURE - 5



## MANTRI

Date: 30-5-19

To: *Principal*  
The Secretary  
Department of Commerce and Industries,  
Government of Karnataka  
Vikas Soudha  
Bengaluru -560001



**Sub : Identification and Regularization of Kharab Lands in the lands forming part of lands acquired and allotted to Mantri Techzone Private Limited, ( earlier known as Manipal ETA Infotech Private Limited)in various Survey Numbers of Agara and Jakkasandra villages Beguru Hobli, Bengaluru South Taluk which are covered under the Allotment letter dated 28-6-2007 (attached).**

Ref: (1) Allotment letter 28-6-2007.

(2) Order passed in the Civil Appeal No 5016/2016 by the Hon'ble Supreme Court.

The Govt. of Karnataka had acquired various lands in Agara & Jakkasandra Villages through KIADB for Industrial Purposes under the KIAD Act in the year 2004. Subsequently the KIADB had allotted the said lands in favour of Mantri Techzone Pvt Ltd (earlier known as Manipal ETA Infotech Limited). The allotment was made by KIADB based on Project Approval in the 78<sup>th</sup> High Level Committee meeting (HLC) held on 21-6-2000 pursuant to the GLOBAL INVESTER MEET 2000 and based on consent of the land owners procured by us. The total land allotted is 63 Acre 37 ½ guntas without specifying any Kharab or other lands therein. Copies of the said HLC Approval, KIADB Notification and Allotment letter are enclosed as Annexure No 1 to 3.

After allotment of the said lands, Mantri Techzone Pvt Ltd obtained sanction plan and several approvals from the various authorities and started the construction activities on the said allotted lands. Meanwhile, several NGO's had filed Appeal before the National Green Tribunal in the year 20014 in OA No 222/2014 (Old Number 114/2014) and same was disposed with certain direction. Aggrieved by the said order Mantri Techzone Pvt Ltd., filed Civil Appeal No 5016/2016 before the Hon'ble Supreme Court and same was disposed on 5-3-2019. A copy of the said order is enclosed as Annexure No 4.

**Mantri Techzone Private Limited**  
CIN : U45201KA2003PTC033023



Mantri House, 4, Vittal Mallya Road, Bengaluru 560001  
T : +91 80 4130 0000 www.mantri.in  
F : +91 80 4132 5000

# 418

As per the order of the Supreme Court in Civil Appeal No 5016/16, Mantri Techzone Pvt Ltd is required to identify Kharab lands within the Project Land., but the Revenue Authorities have not been able to identify the existence of any Kharab land within the allotted lands. Therefore, under these circumstances and in compliance of the Orders of the Supreme Court, we request to you kindly identify the Kharab (B) lands if any within the lands covered under Annexure No 1 hereto and regularize the occupation of the same in accordance with law by accepting the Guideline value of such Kharab lands and facilitate implementation of the Project.

Thanking you  
Yours sincerely  
For Mantri Techzone Pvt Ltd

  
B.S. Ravi Shankar.  
Authorised Signatory



- Encl: (1) Project Approval in HLC on 21-6-2000. .  
(2) Final Notification issued by the GOK 23-4-2004  
(3) Allotment letter 28-6-2007 issued by KIADB.  
(4) Order passed in the Civil Appeal No 5016/2016

Copy to:

The Commissioner, KIADB, Khanija Bhavan, RC Road, Bengaluru.

*THIS COPY ATTESTED BY ME*  
*Lakshminarayana 02/03/2024*  
LAKSHMINARAYANA  
Advocate & Notary Public  
GOVT OF INDIA  
# 15, 1st Main, 2nd Cross  
near Jyoti College, Anco Layout, K. digantha  
Bengaluru Urban, Karnataka - 560037

BEFORE THE HON'BLE NATIONAL GREEN  
TRIBUNAL BENCH

SOUTHERN ZONE, CHENNAI

Execution Application No.10 of 2023 (SZ)

IN

Original Application No.222 of 2014 (PB)

The Forward Foundation & Ors.

... Applicant(s)

-Vs-

State of Karnataka & 9 Ors.

... Respondent(s)

**VOLUME 3 : STATEMENT OF  
OBJECTIONS AND TYPED SET OF  
DOCUMENTS FILED ON BEHALF  
OF THE 9<sup>TH</sup> RESPONDENT**

**M/s. CHANDRAMOULI PRABHAKAR (MS. 4136 / 2015)**

**R. PRITHVIRAJ PANDIAN (MS. 422 / 2015)**

**NITHYAVENDHAN K (MS. 2199/2015)**

**R. VANDHANA PRABHU (MS. 8022 / 2021)**

**M/s. PC LAW CHAMBERS**

**Ph No:** 9940469099 / 9677003795

**Address:** M/s. PC Law Chambers  
C-2 (2<sup>nd</sup> Floor), Vasanth Apartments,  
75/40, CP Ramaswamy Road,  
Alwarpet Chennai 600 018

**Email:** chandramouli@pclawchambers.com  
prithviraj@pclawchambers.com