

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTH ZONE AT  
CHENNAI  
MEMORANDUM OF APPLICATION  
(Under Sections 14 read with 18(1) of the National Green  
Tribunal Act, 2010)**

Application No. 67 of 2022

Kumaresan

.. Applicant

Vs

Tantrasnco & ors

.. Respondents

**INDEX**

| <b>SL No</b> | <b>Description</b>   | <b>P No.</b> |
|--------------|--|--------------|
| 1            | Memo filed in response to counter affidavit of TANTRANSCO served on 10.10.2022 | 1            |
| 2            | Maps   | 17           |
| 3            | Inspection report of the PWD   |              |

**Through  
A. Yogeshwaran  
Counsel for the Applicants**

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTH ZONE AT  
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MEMORANDUM OF APPLICATION  
(Under Sections 14 read with 18(1) of the National Green  
Tribunal Act, 2010)**

**Application No. 67 & 93 of 2022**

**MEMO FILED ON BEHALF OF THE APPLICANTS**

The applicants submit as follows:

1. It is submitted that after the matter was argued by the applicants, TANTRANCO has filed a memo dated 20.02.2023, wherein it has been admitted that the alignment has indeed changed. The table in the objection memo submitted by TANTRANSCO dated 20.02.2023 contains coordinates of the approved location and location where 765 Kv towers have been constructed.
2. The memo states in Para 12 that "in respect to co-ordinates only minor differences in seconds are inferred". However, on plotting the comparison co-ordinates of CRZ approved and On- ground 765 towers as filed by TANTRANSCO on approved CZMP 2018 maps under CRZ notification 2011, the distance between the respective towers ranges from 50m to 1470 m. Having 0m - 500m from HTL towards landwards as CRZ zones, this variation in distance between approved and on- ground towers is huge. Hence it is obvious that the CRZ classification will be altered drastically between the approved and on- ground towers.
3. The respondent has failed to appreciate the significance of the distance that each second indicates. A second variation in latitude indicates a distance of about 32 meters and a second difference in longitude is about 30 meters at the tropic of cancer. Therefore, any change in seconds also alters the location substantially, as can be seen from the map. TRANSCO

has also misrepresented the nature of the CRZ classification. As can be seen from the map, the indicated locations where the towers are constructed in CRZ IA – mangrove and mangrove buffer as marked on the CZMP.

4. Using the figures in TANTRANSCO's memo the alteration in CRZ classification and variation in distance is indicated with red texts below Para 3 for each of the 765kV approved vs On- ground towers. These show that there is clear deviation of the approved alignment by TANTRANSCO. It is to be noted that TANTRANSCO has also wrongly mentioned the CRZ classification even for the approved towers. AP 5 & AP 8 co-ordinates for approved towers are the same as filed by them. This clearly suggests that TANTRANSCO in addition to violations are deliberately providing false information.
  
5. It is submitted that TRANSCO claims that the applicant has mistaken a few 400kV towers to be 765kV towers, but this does not change the fact that there are towers erected in CRZ 1A area, wherein there is no permission allotted by CRZ clearance dated 01.11.2019 – irrespective of 400 kv or 765 kv.

**Comparison of CRZ Approved towers Vs On Ground towers. (Red text represent variations)**

| On Ground 765 KV towers |                           |               |               |                    | Approved CRZ 765 KV towers |                |                       | Distance between On-ground & approved Towers (m) |
|-------------------------|---------------------------|---------------|---------------|--------------------|----------------------------|----------------|-----------------------|--|
| S . N O                 | SITE LOCATION S           | LATI TTUDE    | LONG ITUDE    | CRZ-CLASI FICATION | LATTI TUDE                 | LONGIT UDE     | CRZ - CLASSIFI CATION |  |
| 1                       | NCT PS III to NCP S AP 15 | 13°12'38.33"N | 80°18'17.81"E | CRZ IA             | 13°12'35.561"N             | 80°18'27.82"E  | CRZ II                | 317 m  |
| 2                       | AP 14                     | 13°12'46.28"N | 80°18'31.51"E | CRZ IA             | 13°12'47.835"N             | 80°18'31.957"E | CRZ II                | 50 m   |
| 3                       | AP 13                     | 13°12'53.74"N | 80°18'33.72"E | CRZ II<br>CRZ IA   | 13°12'51.720"N             | 80°18'33.15"E  | CRZ II                | 64 m   |
| 4                       | AP12                      | 13°13'7.77"N  | 80°18'33.61"E | CRZ IA             | 13°13'2.373"N              | 80°18'33.165"E | CRZ IV B              | 166 m  |
| 5                       | AP 11                     | 13°13'20.18"N | 80°18'36.53"E | CRZ IA             | 13°13'11.243"N             | 80°18'33.432"E | CRZ IB                | 290 m  |
| 6                       | AP 10                     | 13°13'30.80"N | 80°18'40.62"E | CRZ IA<br>CRZ II   | 13°13'27.082"N             | 80°18'39.096"E | CRZ II                | 123 m  |
| 7                       | AP 9                      | 13°13'40.82"N | 80°18'49.83"E | CRZ IA<br>CRZ IB   | 13°13'33.922"N             | 80°18'52.001"E | CRZ II<br>CRZ IB      | 223 m  |
| 8                       | AP 6                      | 13°14'2.78"N  | 80°18'59.17"E | CRZ IA             | 13°13'38.282"N             | 80°18'58.365"E | CRZ II                | 753 m  |
| 9                       | AP 5                      | 13°14'16.57"N | 80°18'59.82"E | CRZ IV B & CRZ IA  | 13°13'43.411"N             | 80°18'57.931"E | CRZ IV B              | 1021 m   |
| 10                      | AP 3                      | 13°14'41.80"N | 80°18'56.90"E | CRZ IV B & IA      | 13°13'54.026"N             | 80°18'59.264"E |                       | 1470 m   |

|        |      |                        |                       |          |                        |                    |          |        |
|--------|------|------------------------|-----------------------|----------|------------------------|--------------------|----------|--------|
| 1<br>1 | AP 2 | 13°14'<br>'47.38<br>"N | 80°19'<br>1.81"E      | CRZ IA   | 13°14'<br>5.99"N       | 80°19'0.6<br>84"E  | CRZ II   | 1272 m |
| 1<br>2 | AP 8 | 13°13'<br>'46.41<br>"N | 80°18'<br>58.16"<br>E | CRZ IV B | 13°13'<br>43.41<br>1"N | 80°18'<br>57.931"E | CRZ IV B | 92 m   |
| 1<br>3 | AP 4 | 13°14'<br>'29.54<br>"N | 80°18'<br>59.07"<br>E | CRZ IV B | 13°14'<br>23.11"<br>N  | 80°18'59.<br>589"E | CRZ IV B | 199 m  |

6. In Para 3 TANTRANSCO states that "the approach road is being removed as and when the erection work is completed". However, the dumped earth and debris materials for five 765kV and all thirteen 400kV towers in backwaters and Ennore wetlands whose erection has been completed were still present as on 14.07.2022 when inspected by WRD. The inspection report by WRD dated 14.07.2022 is filed along with this memo.

7. The observations of WRD after inspection is extracted below:

| Sl. No. | Name of Transmission Tower | ID No   | Status of Tower                          | Recommendation by WRD  |  |
|---------|----------------------------|---------|--|--|--|
|         |                            |         |  | Report   | Suggestion   |
| 2       | 765 KV                     | AP - 03 | Erection of Transmission Tower Completed | <ul style="list-style-type: none"> <li>•The Construction of Transmission tower has been completed and also the pile cap is found to be above the high tide level of back waters of Kosasthalaiyar River. (+1.200m)</li> <li>•It is observed that the size of the pile cap of the Transmission tower is 5.75m x 5.750m x 1.50m.</li> <li>• The Location is tower is closer to the bank of the backwaters of Kosasthalaiyar river</li> </ul> | <p>The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. submerged dumped material have also to be completely removed and taken away from site as per the conditions 19 in the G.O.Ms.No.191 Public works (R1) Department dated: 17.08.2020</p> |

8. Moreover, according to WRD out of thirteen 400kV transmission towers in backwaters and Ennore wetlands, 7 towers' pile cap was found to be "constructed above the water level". This is in violation of the recommendations in the EIA report and TNSCZMA recommendations that requires that the Pier Cap shall be below the lowest water level. An extract from the inspection report is shown below.

|    |        |          |   |   |
|----|--------|----------|---|---|
| 19 |        |          |   |   |
| 7  | 400 KV | AP - 30A | Erection of<br>Transmission<br>Tower<br>Completed | <ul style="list-style-type: none"> <li>• It is located in the bund portion of B-canal (Western Bank of B-Canal). The pile cap of this Transmission Tower is 4.84m x 4.84m x 1.50m.</li> <li>• The pile cap is constructed above the water level.</li> </ul> <p>The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. The existing approach road which was formed across the B canal with RCC hume pipes has to be completely removed and taken away from site to ensure free flow of water in the canal.</p> |

9. It is to be noted that even after suggestions from WRD, the temporary road structures were left untouched for another atleast two months and until this honourable tribunal ordered to remove the temporary structures.

10. As per earlier NGT's order dated 10.10.2022, TANTRANSO was directed to remove the temporary structures put up for erection of towers in view of the North-East monsoon. However, NGT found that the

temporary "roads" in the Kosasthalaiyar were removed only superficially and were untouched in certain locations. Only the shallow gravel was removed and the debris were not removed to the original depth of the river. Hence the tribunal on 10.11.2022 has redirected TANTRANSCO as follows- " As the Meteorological Department has forewarned of heavy rainfall for the whole of this week, we direct the 1st respondent to immediately remove the temporary structures and make clear the way for the water to flow freely saving the city from one more deluge".

11. In the objection memo dated 20.02.2023, the pictures tagged as "*d. Removal of temporary roads formed after completion of works*" are the same pictures as submitted in response dated 12.12.2022 by TANTRANSCO. These photos only mention Before and After order dated 10.10.2022 but are not dated. In the response dated 12.12.2022 by TANTRANSCO, S.no. 3 of the index page mentions Photos showing compliance of the NGT order dated 10.**November**.2022 (consequent month's order that mandated TANTRANSCO "*to immediately remove the temporary structures and make clear the way for the water to flow freely saving the city from one more deluge*") in pages 7-10. However, the photos in pages 7- 10 are tagged as Before and After order dated 10.**October**.2022 and not of the order dated 10. 11.2022.
12. As already demonstrated to the Hon'ble Court, pictures depicting the violations of order dated 10.10.2022 of temporary roads of exactly the same towers shown in TANTRANSCO's response 12.12.2022 are already submitted in page numbers of 4-11 of Memo filed by applicant dated 9.11.2022.

13. It is to be noted that TANTRANSCO has illegally laid access roads inside Kosasthaliyar floodplains area of Ennore Village at Survey Number 252 for erection of transmission tower in an unapproved location at GPS co-ordinates 13°15'45.06"N, 80°19'20.82"E in CRZ IA and IB areas (west of kattupalli road and south of railway line from Kamarajar port) , unapproved by CRZ clearance dated 01 November 2019 instead of removing the already laid "temporary roads" to comply with the NGT order dated 10.11.2022 that mandated TANTRANSCO *"to immediately remove the temporary structures and make clear the way for the water to flow freely saving the city from one more deluge"*. The representation dated 07.12.2022 by fishers to take action on the encroachment and to comply with the NGT order dated 10.11.2022 is filed herewith.
14. The construction debris for the "road" is dumped on the floodplains (paraval area) where rainwater is already contained. Fishers report that if water can't stay in the paraval area because of the encroachments- water flow's velocity in the river increases and is a risk for transport of boats. This could be a potential flood risk.
15. It is to be noted that, the illegal encroachment of Kosasthalaiyar floodplains at Ennore Village at GPS co-ordinates 13°15'45.06"N, 80°19'20.82"E in CRZ IA and IB areas (west of kattupalli road and south of railway line from Kamarajar port) by TANTRANSCO was occurring amidst the Indian Meteorological department's forecast- "cyclonic storm and heavy rainfall" in Northernpart of Tamilnadu and red alert warning over the state on 9 December 2022 and "Mandous" cyclone. These clearly indicate that TANTRANSCO has violated NGT's order dated 10.11.2022.

**Photos below dated 4.12.22 at GPS co-ordinates 13°15'45.06"N, 80°19'20.82"E, unapproved location by CRZ clearance**





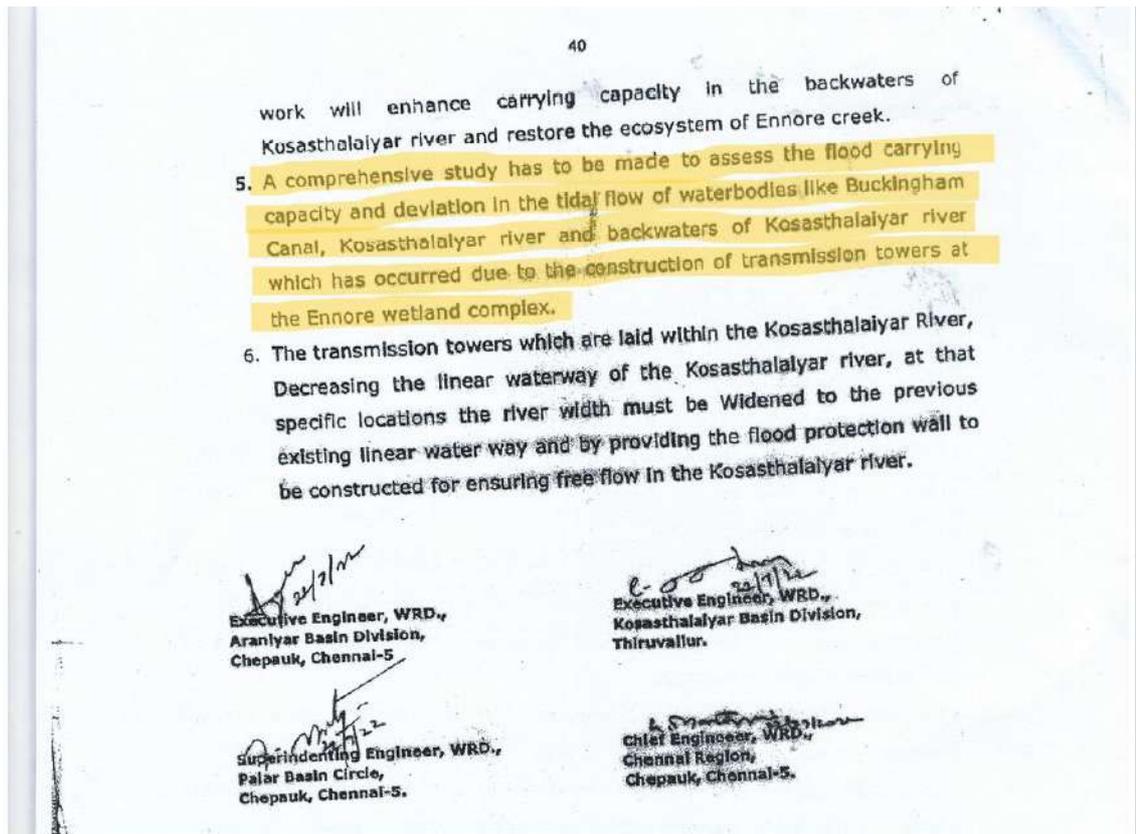
**Photos below dated 17.12.22 at GPS co-ordinates 13°15'45.06"N, 80°19'20.82"E, unapproved location by CRZ clearance**







16. It is to be noted that these are continuous violations of TANTRANSCO for several months. It is also to be noted that WRD has recommended a comprehensive study to assess the flood carrying capacity and deviation in tidal flow that has occurred due to construction of transmission towers at Ennore wetland complex. This has to be conducted considering all encroached segments inside the river, floodplains wherever encroached upon. The extract from the inspection report dated 14.07.2022 is given below:



17. This indicates that WRD has acknowledged change in flood carrying capacity and deviation of tidal flow.

18. Uprooting of Mangroves: The appraisal of the project at the stages of EIA, at TNSCZMA level is clearly based on the proposal that no mangroves were to be impacted during the implementation of the project- erection of towers. Extracts from the EIA report (page 68) and TNSCZMA conditions dated 19.08.2019 are shown below:

Page 68 of EIA report:

#### **5.0 ANALYSIS OF ALTERNATIVES:**

This section analyses the project alternatives in terms of project design, selection of tower location.

#### **RELOCATION OPTION**

Relocation option to a different site might be an option available for the project. At present the project passes through the CRZ IA, CRZ IB, CRZ II, CRZ III (NDZ), CRZ IV. The location of towers are done in such a way without affecting the mangroves in the project area and the distance between the towers are increased in order to avoid cutting of trees. Thus, relocation is not possible however the design is done to have minimum impact and shortest distance of transmission line.

This was already presented to the court in Para 19 of OA 67 of 2022.

Page 3 of TNSCZMA recommendation dated 19.08.2019

- e. The project proponent has informed that the alignment is proposed in order to avoid tree cutting. Thus, there is no felling of trees and trimming will be opted wherever is possible. The locations of towers are done in such a way without affecting the mangroves in the project area and the distance between the towers are increased in order to avoid cutting of trees.

..3..

**Photos dated 01.02.2023 of some of the towers the destroyed mangroves are presented below:**

**Site Location: Tower AP 3 (765 kV)**



**Site Location: Tower AP 3 (765 kV)**



**Site Location : AP 24 SE (400 kV)**



**Site Location: GPS 13°14'48.14"N, 80°18'56.19"E (Tower name not given at this location)**



19. In Para 7 of TANTRANSCO's memo dated 20.02.2023, it is stated that the tower specified in OA 93 of 2022 is "approved by PWD and as well in CRZ clearance". However, it is to be noted that, PWD can issue NOC for a tower's location and it can only be valid when CRZ clearance permits the same location in the first place. Without a CRZ clearance, PWD NOC is not valid. For the ease of understanding of the deviation in location of on- ground and CRZ approved location, a google earth image is produced below using co- ordinates as filed by TANTRANSCO.
20. It is therefore clear that the respondent has inter alia
- a. Constructed towers in deviation of the clearance issued.
  - b. Has not removed roads, land filling etc
  - c. Has not constructed the pier caps below the water level

d. Has interfered with the river and the flood plain's capacity to carry water and serve as fishing grounds.

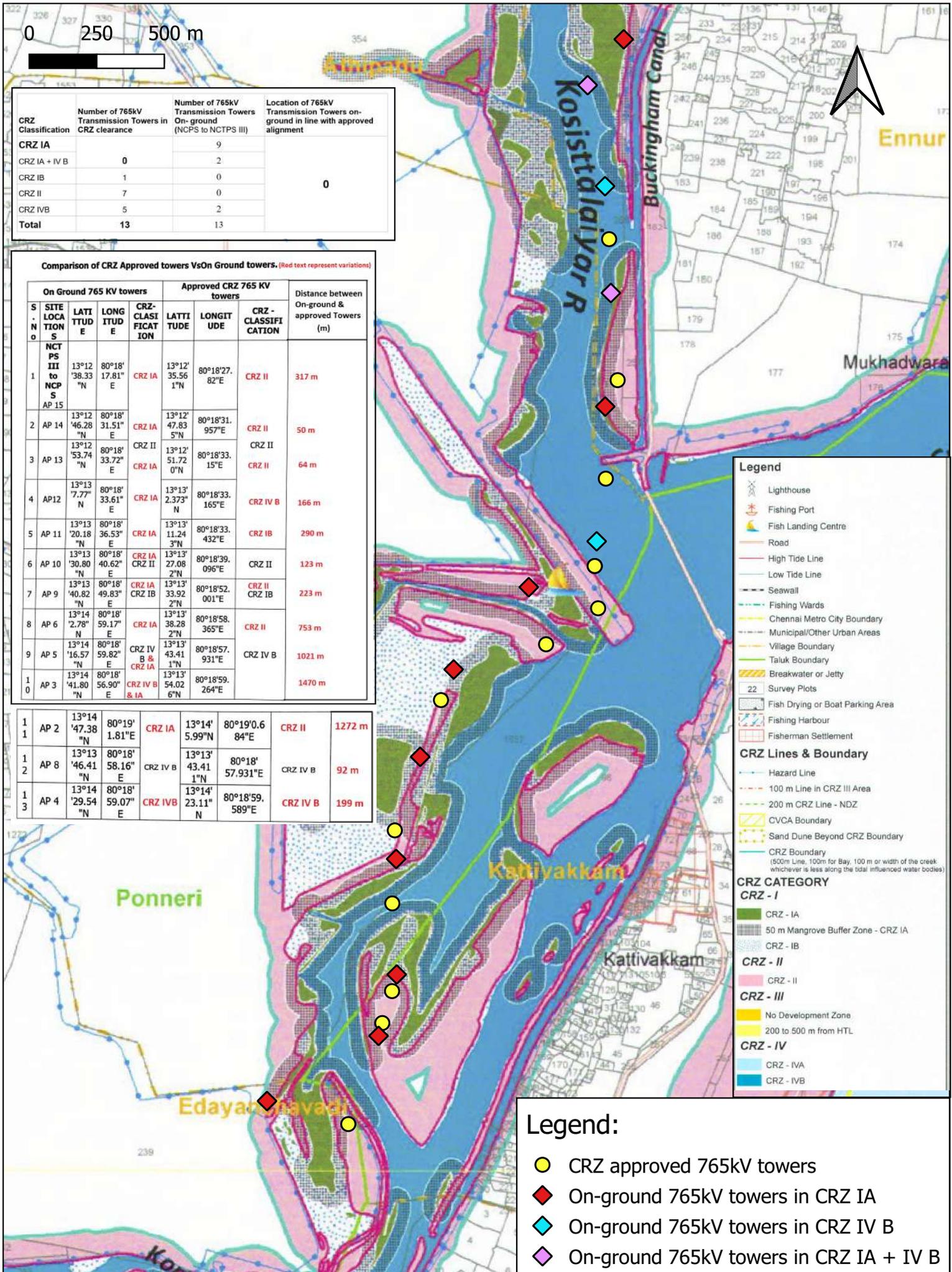
21. It is submitted that the PP has clearly violated the permissions issued – it cannot be contented that the deviation is only by a few hundred meters or less and hence it is not significant. The entire area regulated under CRZ is only 500 meters and deviation means that the CRZ zone classification itself changes, as has been seen from the above instances.

Dated this the 28<sup>th</sup> day of April, 2023 at Chennai



Counsel for the Applicant

Variation of CRZ classification presented over Comparison of CRZ approved 765kV towers Vs On ground 765 kV towers as filed in Objection memo by TANTRANSCO by overlaying on approved CZMP 2018



**INSPECTION REPORT OF THE CHIEF ENGINEER, WRD, CHENNAI REGION, CHEPAUK, CHENNAI-5 AND SUPERINTENDING ENGINEER, WRD, PALAR BASIN CIRCLE, CHEPAUK, CHENNAI-5 ALONG WITH TANTRANSCO OFFICIALS AS ON 14.07.2022 (THURSDAY)**

**DATE OF INSPECTION: 14.07.2022**

**KOSASTHALAIYAR RIVER:**

Kosasthalaiyar is 136 kilometres long and originates near Pallipattu in Thiruvallur District and drains into the Bay of Bengal near Creek. Its northern tributary Nagari river originates in Chittoor district of Andhra Pradesh and joins the main river in the backwaters of Poondi reservoir. Its catchment area is spread over Vellore, Chittoor, North Arcot, Thiruvallur and Chennai Districts. It has a catchment area in North Arcot District where it branches near Kesavaram Anicut and this tributary flows to the Chennai city as Cooum River, while the main river flows to the Poondi reservoir. From the Poondi Reservoir, the river flows through Thiruvallur District, enters the Chennai Metropolitan area, and joins the sea at Ennore Creek.

**BUCKINGHAM CANAL:**

Buckingham Canal is 418 Km in Length and this canal extends 248 Km in Andhra Pradesh and 170 Km in Tamil Nadu. It starts near Pulicat in North and ends at Marakanam Backwaters. The canal interconnects with estuaries and sea mouth at Pulicat, Ennore, Cooum, Adayar and Paramankeni. The North Buckingham Canal has length of 58 Kms from Pulicat to the confluence of Cooum River.

**ENNORE CREEK:**

The flood discharge from the Redhills, North Buckingham canal and Kosasthalaiyar flow to the Ennore creek. At present, the width of flow at mouth is 120M instead of the original width of 400M. When the discharge is in normal condition, there is no possibility of inundation in and around these areas. If Poondi Reservoir releases excess water to a maximum of 1,20,000 cusecs ( i.e. in abnormal condition) then there is possibilities of flooding in Creek Backwater area (flood plains) to the length of 3 KM from Ennore mouth.

The Chairman of Advisory Committee has convened a meeting on 13.07.2022 regarding mitigation and management of flood risk in Chennai Metropolitan area. During the meeting the Chairman of Advisory Committee on mitigation and management of flood risk has directed the WRD officials to submit the report on the subject of flood risk in the water bodies such as Buckingham Canal & Back Waters of Kosasthalaiyar River due to construction of transmission towers by the TANTRANSCO. Based on the above the WRD officials inspected the Buckingham Canal & Back Waters of Kosasthalaiyar River along with TANTRANSCO Officials.

**PROPOSAL -1**

In G.O.Ms.No.191 Public Works (R1) department dated 17.8.2020, the permission was accorded to erect transmission towers (7Nos.) in the Ennore Creek Backwaters area and Kosasthalaiyar river for erection of 765KV DC Transmission line from the proposed North Chennai Thermal Power Station Stege-3 plant to the proposed North Chennai 765KV pooling stations. The inspection committee inspected the site of 765KV Transmission towers & the

status report of erection of Transmission Towers for 765KV is furnished in Annexure A.

### **PROPOSAL -2**

Further, TANTRANSCO has applied NOC for erection of Transmission Towers (13 Nos.) 400KV in Ennore Creek Backwaters area and Kosasthalaiyar Area. This proposal was submitted to the Government for obtaining necessary sanction vide the Engineer-in-Chief (WRD), & Chief Engineer (General), PWD, Chennai-5, Letter No. S7(1) / 36384 / TANTRANSCO - ENNORE / OT 5 / 2018-2 , Dated. 08.10.2020 for getting approval. The proposal is in circulation at the Government level. But before getting approval from the Government. The TANTRANSCO started the work of erection of Transmission Towers for 400KV in Ennore Back waters and Kosasthalaiyar Area. The inspection committee inspected the various locations of Transmission Towers and it is informed that out of 13 Nos. of Transmission Towers, 10 Nos of Transmission Towers are located in the Ennore Creek Backwaters area and Kosasthalaiyar area, and 3 Nos. are located in the Saltpan Land of Edayanchavadi Village, The status report of erection of Transmission Towers for 400KV is furnished in Annexure B.

### **PROPOSAL -3**

The Scheme of erection of 765KV DC line on DC tower with Hexa zebra conductor from the proposed North Chennai 765 KV Pooling station to Ariyallur (Villupuram) 765/400KV Substation has been Sanctioned vide G.O (Ms) No. 312 Dated: 26.11.2018.

In this proposal there are 74 nos of Tower erection was granted in the GO. All the 74 nos of towers were erected before 2018. The detailed status furnished in Annexure-C.

**OFFICERS PRESENT:****Water Resources Department:**

- |    |                                  |  |
|----|----------------------------------|--|
| 1. | Er. G. Muralidharan, B.E.,       | Chief Engineer, WRD,<br>Chennai Region,<br>Chepauk, Chennai.                               |
| 2. | Er. A. Muthaiya, B.E.,           | Superintending Engineer, WRD,<br>Palar Basin Circle,<br>Chepauk, Chennai-5.                |
| 3. | Er. A. Jayakumari, B.E.,         | Executive Engineer, WRD,<br>Araniyar Basin Division,<br>Chepauk, Chennai.                  |
| 4. | Er. G. Anbasaran, B.Tech, M.B.A. | Assistant Executive Engineer,<br>WRD, Adayar Basin Sub division,<br>Chepauk, Chennai.      |
| 5. | Er. P. Srinivasa Prakash,        | Assistant Engineer, WRD,<br>Ennore Wharf Section, (I/C),                                   |
| 6. | Er. B. Sundaram, B.E             | Assistant Engineer, WRD.,<br>Cholavaram Irrigation<br>Section, (I/C)<br>Redhills, Chennai. |

**TANTRANSKO:**

- |     |                        |   |
|-----|------------------------|---|
| 6.  | Mr. S. Marimuthu       | Chief Engineer,<br>Civil/Transmission                                   |
| 7.  | Mr. S. Devaraj         | Superintending Engineer,<br>General Construction Circle -1,<br>Chennai. |
| 8.  | Mr. A. Pushpanathan    | Superintending Engineer,<br>General Construction Circle -1,<br>Chennai. |
| 9.  | Mr. G. Thirumurthy     | Executive Engineer,<br>Transmission Line, Construction,<br>Poonamallee. |
| 10. | Mrs. K. Chandravadhani | Executive Engineer,<br>Transmission Line Construction,<br>Chennai.      |

The above officers were jointly inspection in Back water and Kosasthalaiyar River and B- Canal (5no's). The balance tower location's has been inspected by the field officers report was compiled as follows.

**Proposal I****LOCATION DETAILS OF 765KV TRANSMISSION TOWER:**

| SI.No | Location Number | UTM - Coordinates |          | Top level of Pile cap |
|-------|-----------------|-------------------|----------|-----------------------|
|       |                 | Easting           | Northing |                       |
| 1     | AP-2            | 426016            | 1464478  | +1.335 (Existing)     |
| 2     | AP-3            | 425877            | 1464325  | +3.401(Existing)      |
| 3     | AP-4            | 425941            | 1463949  | -1.50(Proposed)       |
| 4     | AP-5            | 425973            | 1463538  | +3.500(Existing)      |
| 5     | AP-6            | 425960            | 1463114  | +2.896(Existing)      |
| 6     | AP-7            | 425942            | 1462817  | -1.50(Proposed)       |
| 7     | AP-8            | 425910            | 1462623  | +2.480(Existing)      |

**Proposal II****LOCATION DETAILS OF 400KV TRANSMISSION TOWER:**

| SI.No | Location Number | UTM - Coordinates |          | Top level of Pile cap |
|-------|-----------------|-------------------|----------|-----------------------|
|       |                 | Easting           | Northing |                       |
| 1     | AP-15           | 427073            | 1468214  | +1.069(Existing)      |
| 2     | AP-16           | 426925            | 1467858  | +1.290(Existing)      |
| 3     | AP-17           | 426958            | 1467560  | +1.517(Existing)      |
| 4     | AP-28           | 425853            | 1464517  | +1.190(Existing)      |
| 5     | AP-29           | 426003            | 1464241  | +2.068(Existing)      |
| 6     | AP-30           | 426012            | 1463866  | +3.280(Existing)      |
| 7     | AP-30A          | 426016            | 1463518  | +1.417(Existing)      |
| 8     | AP-31           | 426025            | 1463121  | +1.051(Existing)      |
| 9     | AP-32           | 426015            | 1462858  | -1.50(Proposed)       |
| 10    | AP-33           | 426006            | 1462486  | -1.50(Proposed)       |
| 11    | AP-35           | 425552            | 1461359  | -1.50(Proposed)       |

**Proposal III****LOCATION DETAILS OF 765KV TRANSMISSION TOWER:**

| SI. No | Location Number | UTM - Coordinates |           |
|--------|-----------------|-------------------|-----------|
|        |                 | Easting           | Northing  |
| 1      | AP-6            | 422242.0          | 1460419.0 |
| 2      | AP-7            | 421907.0          | 1460399.0 |
| 3      | AP-8            | 421737.0          | 1460592.0 |
| 4      | AP-9            | 421592.0          | 1460907.0 |
| 5      | AP-10           | 421317.0          | 1461154.0 |
| 6      | AP-11           | 421069.0          | 1461254.0 |
| 7      | AP-12           | 420898.0          | 1461586.0 |
| 8      | AP-13           | 420682.0          | 1461759.0 |
| 9      | AP-13/1         | 420535.0          | 1461962.0 |
| 10     | AP-14           | 420331.0          | 1462243.0 |
| 11     | AP-14/1         | 420230.0          | 1462569.0 |
| 12     | AP-16           | 419627.0          | 1463243.0 |
| 13     | AP-17           | 419399.0          | 1463432.0 |
| 14     | AP -35          | 412910.0          | 1467253.0 |
| 15     | AP-36           | 412550.0          | 1467091.0 |
| 16     | AP-36/1         | 412171.0          | 1467107.0 |
| 17     | AP-37           | 411787.0          | 1467119.0 |
| 18     | AP-38           | 411412.0          | 1467164.0 |
| 19     | AP-39           | 410778.0          | 1466791.0 |
| 20     | AP-40           | 410510.0          | 1466559.0 |
| 21     | AP-41           | 410388.7          | 1466424.7 |

|    |         |          |           |
|----|---------|----------|-----------|
| 22 | AP-42   | 410215.8 | 1466229.8 |
| 23 | AP-43   | 409869.2 | 1465966.1 |
| 24 | AP-44   | 409869.2 | 1465966.1 |
| 25 | AP-45   | 409480.0 | 1465861.8 |
| 26 | AP-46   | 409184.0 | 1465778.0 |
| 27 | AP-47   | 408879.0 | 1465719.0 |
| 28 | AP-48   | 408581.0 | 1465687.0 |
| 29 | AP-49   | 408354.0 | 1465702.0 |
| 30 | AP-50   | 407992.0 | 1465791.0 |
| 31 | AP-51   | 407896.0 | 1466023.0 |
| 32 | AP-52   | 407551.0 | 1466199.0 |
| 33 | AP-53   | 407173.0 | 1466194.0 |
| 34 | AP-54   | 406798.0 | 1466224.0 |
| 35 | AP-55   | 406435.0 | 1466290.0 |
| 36 | AP-56   | 406073.0 | 1466215.0 |
| 37 | AP-57   | 405775.0 | 1465971.0 |
| 38 | AP-78   | 396474.0 | 1463379.0 |
| 39 | AP-79   | 396388.0 | 1463008.0 |
| 40 | AP-80   | 396175.0 | 1462778.0 |
| 41 | AP-81   | 395836.0 | 1462672.0 |
| 42 | AP-82   | 395522.0 | 1462701.0 |
| 43 | AP-82/1 | 395227.0 | 1462799.0 |
| 44 | AP-82/2 | 394933.0 | 1462902.0 |
| 45 | AP-84   | 394455.0 | 1463101.0 |
| 46 | AP-85   | 394080.0 | 1463077.0 |

|    |          |          |           |
|----|----------|----------|-----------|
| 47 | AP-85/1  | 393714.0 | 1463098.0 |
| 48 | AP-86    | 393361.0 | 1463109.0 |
| 49 | AP-87    | 393016.0 | 1462958.0 |
| 50 | AP-88    | 392710.0 | 1462772.0 |
| 51 | AP-89    | 392378.0 | 1462715.0 |
| 52 | AP-90    | 391989.0 | 1462759.0 |
| 53 | AP-91    | 391672.0 | 1462706.0 |
| 54 | AP-92    | 391416.0 | 1462519.0 |
| 55 | AP-93    | 391193.0 | 1462256.0 |
| 56 | AP-94    | 390859.0 | 1462135.0 |
| 57 | AP-95    | 390495.0 | 1462119.0 |
| 58 | AP-96    | 390133.0 | 1462167.0 |
| 59 | AP-97    | 389822.0 | 1462394.0 |
| 60 | AP-97/1  | 389571.0 | 1462577.0 |
| 61 | AP-97/2  | 389314.0 | 1462838.0 |
| 62 | AP-98    | 389061.0 | 1463099.0 |
| 63 | AP-99    | 388710.0 | 1463194.0 |
| 64 | AP-100   | 388363.0 | 1463067.0 |
| 65 | AP-100/1 | 388040.0 | 1462886.0 |
| 66 | AP-100/2 | 387717.0 | 1462705.0 |
| 67 | AP-101   | 387448.0 | 1462556.0 |
| 68 | AP-102   | 386935.0 | 1462088.0 |
| 69 | AP-103   | 386223.0 | 1461950.0 |
| 70 | AP-104   | 385875.0 | 1462080.0 |
| 71 | AP-105   | 385634.0 | 1462351.0 |

|    |          |          |           |
|----|----------|----------|-----------|
| 72 | AP-106   | 385535.0 | 1462706.0 |
| 73 | AP-107   | 385315.0 | 1462943.0 |
| 74 | AP-107/1 | 384988.0 | 1463005.0 |

**PROPOSAL I - (ANNEXURE-A)**

**As per G.O.(Ms)No.191 Public Works (R1)**  
**Department Dt.17.08.2020**

| Sl. No. | Name of Transmission Tower | ID No   | Status of Tower                          | Recommendation by WRD  |   |
|---------|----------------------------|---------|--|--|---|
|         |                            |         |  | Report   | Suggestion  |
| 1       | 765 KV                     | AP - 02 | Erection of Transmission Tower Completed | <ul style="list-style-type: none"> <li>•The Construction of Transmission tower has been completed and also the pile cap found to be in the of bank of Back Waters of Kosasthalaiyar River.</li> <li>•It is observed that the size of the pile cap of the Transmission tower is 7.50m x 4.50m x 1.50m</li> <li>• It is informed that the land in which transmission tower AP-02 was constructed belongs to Kamarajar Port Limited (KPL) and also the lease rent has been deposited by TANTRANSCO to KPL.</li> </ul> | The dumped earth and debris materials which were used for the formation of approach road has to be completely removed and submerged dumped materials have also to be completely removed and taken away from site as per the conditions 19 in the G.O.Ms.No.191 Public works (R1) Department dated: 17.08.2020 |

| Sl. No. | Name of Transmission Tower | ID No   | Status of Tower                          | Recommendation by WRD  |  |
|---------|----------------------------|---------|--|--|--|
|         |                            |         |  | Report   | Suggestion   |
| 2       | 765 KV                     | AP - 03 | Erection of Transmission Tower Completed | <ul style="list-style-type: none"> <li>•The Construction of Transmission tower has been completed and also the pile cap is found to be above the high tide level of back waters of Kosasthalaiyar River. (+1.200m)</li> <li>•It is observed that the size of the pile cap of the Transmission tower is 5.75m x 5.750m x 1.50m.</li> <li>• The Location is tower is closer to the bank of the backwaters of Kosasthalaiyar river</li> </ul> | <p>The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. submerged dumped material have also to be completely removed and taken away from site as per the conditions 19 in the G.O.Ms.No.191 Public works (R1) Department dated: 17.08.2020</p> |

| Sl. No. | Name of Transmission Tower | ID No   | Status of Tower                              | Recommendation by WRD   |  |
|---------|----------------------------|---------|--|---|--|
|         |                            |         |  | Report  | Suggestion   |
| 3       | 765 KV                     | AP - 04 | The construction work is yet to be commenced | <ul style="list-style-type: none"> <li>This transmission tower is proposed to be constructed in centre portion of the Back Waters of Kosasthalaiyar River.</li> </ul>   | The top of pile cap of transmission towers should be at the level of -1.50m(MSL). The construction of transmission tower requires the formation of approach road by dumping earth materials and debris into the backwaters of Kosasthalaiyar river. These dumped earth and debris have to be completely removed and also even if it is in submerged condition as per the conditions 19 in the G.O.Ms.No.191 Public works (R1) Department dated: 17.08.2020 |
| 4       | 765 KV                     | AP - 05 | Erection of Transmission Tower Completed     | <ul style="list-style-type: none"> <li>The Construction of Transmission tower has been completed in the bund portion in between the Buckingham Canal and the Back Waters of Kosasthalaiyar River and also it is noticed that the pile cap is constructed well above the maximum flood level.</li> <li>It is observed that the size of the pile cap of the transmission tower is 5.75m x 5.75m x 1.50m.</li> </ul> | The dumped earth and debris materials which were used for the formation of approach road has to be completely removed and the submerged dumped materials have also to be completely removed and taken away from site as per the conditions 19 in the G.O.Ms.No.191 Public works (R1) Department dated: 17.08.2020  |

| Sl. No. | Name of Transmission Tower | ID No   | Status of Tower                          | Recommendation by WRD   |   |
|---------|----------------------------|---------|--|---|---|
|         |                            |         |  | Report  | Suggestion  |
| 5       | 765 KV                     | AP - 06 | Erection of Transmission Tower Completed | <ul style="list-style-type: none"> <li>The Construction of Transmission tower has been completed in the bund portion in between the Buckingham Canal and the Back Waters of Kosasthalaiyar River and also it is noticed that the pile cap is constructed well above the bund portion.</li> <li>It is observed that the size of the pile cap of the Transmission tower is 5.75m x 5.75m x 1.50m</li> </ul> | <p>The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. The submerged dumped materials have also to be completely removed and taken away from site as per the conditions 19 in the G.O.Ms.No.191 Public works (R1) Department dated: 17.08.2020</p>   |
| 6       | 765 KV                     | AP - 07 | yet to be commenced                      | <ul style="list-style-type: none"> <li>This transmission tower is proposed to be constructed in center portion of Back Waters of Kosasthalaiyar River</li> </ul>  | <p>The top of pile cap of transmission towers should be at the level of -1.50m(MSL). The construction of transmission tower requires the formation of approach road by dumping earth materials and debris into the backwaters of Kosasthalaiyar river. These dumped earth and debris have to be completely removed and also even if it is in submerged condition as per the conditions 19 in the G.O.Ms.No.191 Public works (R1) Department dated: 17.08.2020</p> |

| Sl. No. | Name of Transmission Tower | ID No   | Status of Tower                          | Recommendation by WRD  |  |
|---------|----------------------------|---------|--|--|--|
|         |                            |         |  | Report   | Suggestion   |
| 7       | 765 KV                     | AP - 08 | Erection of Transmission Tower Completed | <ul style="list-style-type: none"> <li>• The foundation of Transmission towers has been completed and also the pile cap found to be below the water level.</li> <li>• It is observed that the size of the pile cap of the Transmission tower is 7.60m x 7.60m x 1.50m</li> <li>• It is also informed that it is transmission tower is located in Back Waters of Kosasthalaiyar River.</li> </ul> | The dumped earth and debris materials which were used for the formation of approach road has to be completely removed and the submerged dumped material have also to be completely removed and taken away from site as per the conditions 19 in the G.O.Ms.No.191 Public works (R1) Department dated: 17.08.2020 |

**PROPOSAL II - (ANNEXURE-B)****As per G.O.(Ms)No.191 Public Works (R1) Department****Dt.17.08.2020**

| Sl. No. | Name of Transmission Tower | ID No   | Status of Tower                          | Recommendation by WRD   |  |
|---------|----------------------------|---------|--|---|--|
|         |                            |         |  | Report  | Suggestion   |
| 1       | 400 KV                     | AP - 30 | Erection of Transmission Tower Completed | <ul style="list-style-type: none"> <li>• It is located in the bund portion of B-canal (Western Bank of B-Canal). The pile cap of this Transmission Tower is 4.84m x 4.84m x 1.50m</li> <li>• The pile cap is constructed above the water level.</li> </ul>  | The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. The submerged dumped materials have to be completely removed and taken away from site.  |
| 2       | 400 KV                     | AP - 15 | Erection of Transmission Tower Completed | <ul style="list-style-type: none"> <li>• It is located in the bund portion of B-canal (Western Bank of B-Canal). The pile cap of this Transmission Tower is 6.30m x 3.80m x 1.70m.</li> <li>• The pile cap is constructed above the water level.</li> </ul> | The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. The existing approach road which was formed across the B canal with RCC hume pipes has to be completely removed and taken away from site to ensure free flow of water in the canal. |

|   |        |         |   |   |   |
|---|--------|---------|---|---|---|
| 3 | 400 KV | AP - 16 | Erection of<br>Transmission<br>Tower<br>Completed | <ul style="list-style-type: none"> <li>• It is located in the bund portion of B-canal (Western Bank of B-Canal). The pile cap of this Transmission Tower is 6.30m x 3.80m x 1.70m.</li> <li>• The pile cap is constructed above the water level.</li> </ul> | <p>The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. The existing approach road which was formed across the B canal with RCC hume pipes has to be completely removed and taken away from site to ensure free flow of water in the canal.</p> |
| 4 | 400 KV | AP - 17 | Erection of<br>Transmission<br>Tower<br>Completed | <ul style="list-style-type: none"> <li>• It is located in the bund portion of B-canal (Western Bank of B-Canal). The pile cap of this Transmission Tower is 6.30m x 3.80m x 1.70m.</li> <li>• The pile cap is constructed above the water level.</li> </ul> | <p>The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. The existing approach road which was formed across the B canal with RCC hume pipes has to be completely removed and taken away from site to ensure free flow of water in the canal.</p> |

|   |        |         |  |   |   |
|---|--------|---------|--|---|---|
| 5 | 400 KV | AP - 28 | Erection of Transmission Tower Completed | <ul style="list-style-type: none"> <li>• It is located in the bund portion of B-canal (Western Bank of B-Canal). The pile cap of this Transmission Tower is 6.30m x 3.80m x 1.70m.</li> <li>• The pile cap is constructed above the water level.</li> </ul> | <p>The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. The existing approach road which was formed across the B canal with RCC hume pipes has to be completely removed and taken away from site to ensure free flow of water in the canal.</p> |
| 6 | 400 KV | AP - 29 | Erection of Transmission Tower Completed | <ul style="list-style-type: none"> <li>• It is located in the bund portion of B-canal (Western Bank of B-Canal). The pile cap of this Transmission Tower is 6.30m x 3.80m x 1.70m.</li> <li>• The pile cap is constructed above the water level.</li> </ul> | <p>The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. The existing approach road which was formed across the B canal with RCC hume pipes has to be completely removed and taken away from site to ensure free flow of water in the canal.</p> |

|   |        |          |  |   |   |
|---|--------|----------|--|---|---|
| 7 | 400 KV | AP - 30A | Erection of Transmission Tower Completed | <ul style="list-style-type: none"> <li>• It is located in the bund portion of B-canal (Western Bank of B-Canal). The pile cap of this Transmission Tower is 4.84m x 4.84m x 1.50m.</li> <li>• The pile cap is constructed above the water level.</li> </ul> | <p>The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. The existing approach road which was formed across the B canal with RCC hume pipes has to be completely removed and taken away from site to ensure free flow of water in the canal.</p> |
| 8 | 400 KV | AP - 31  | Erection of Transmission Tower Completed | <ul style="list-style-type: none"> <li>• It is located in the bund portion of B-canal (Western Bank of B-Canal). The pile cap of this Transmission Tower is 4.84m x 4.84m x 1.50m.</li> <li>• The pile cap is constructed above the water level.</li> </ul> | <p>The dumped earth and debris materials which were used for the formation of approach road has to be completely removed. The existing approach road which was formed across the B canal with RCC hume pipes has to be completely removed and taken away from site to ensure free flow of water in the canal.</p> |

|    |        |       |  |  |   |
|----|--------|-------|--|--|---|
| 9  | 400 KV | AP-32 | Erection of Transmission Tower is not started. | <ul style="list-style-type: none"> <li>• It is located in the Western Bank of backwaters of Kosasthalaiyar river.</li> </ul> | The dumped earth and debris materials which are to be used for the formation of approach road has to be completely removed and the submerged dumped materials have to be completely removed and taken away from site. |
| 10 | 400 KV | AP-33 | Erection of Transmission Tower is not started. | <ul style="list-style-type: none"> <li>• It is located in the Western Bank of backwaters of Kosasthalaiyar river.</li> </ul> | The dumped earth and debris materials which are to be used for the formation of approach road has to be completely removed and the submerged dumped materials have to be completely removed and taken away from site. |
| 11 | 400 KV | AP-35 | Erection of Transmission Tower is not started. | <ul style="list-style-type: none"> <li>• It is located in the Western Bank of backwaters of Kosasthalaiyar river.</li> </ul> | The dumped earth and debris materials which are to be used for the formation of approach road has to be completely removed and the submerged dumped materials have to be completely removed and taken away from site. |

|    |        |       |  |  |   |
|----|--------|-------|--|--|---|
| 12 | 400 KV | AP-6A | Foundation work was completed and Erection of Transmission Tower is not started. | It is located in the Western Bank of backwaters of Kosasthalaiyar river. | The dumped earth and debris materials which are to be used for the formation of approach road has to be completely removed and the submerged dumped materials have to be completely removed and taken away from site. |
| 13 | 400 KV | AP-7  | Foundation work was completed and Erection of Transmission Tower is not started. | It is located in the Western Bank of backwaters of Kosasthalaiyar river. | The dumped earth and debris materials which are to be used for the formation of approach road has to be completely removed and the submerged dumped materials have to be completely removed and taken away from site. |

**PROPOSAL III - (ANNEXURE-C)****As per G.O.(MS) No: 312 Public works (R1)****Department dated:26.11.2018.**

| Sl. No. | Name of Transmission Tower | ID No  | Status of Tower                          | RECOMMENDATION BY WRD   |   |
|---------|----------------------------|--------|--|---|---|
|         |                            |        |  | REPORT  | SUGGESTION  |
| 1       | 765 KV                     | AP-6   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.  | The debris dumped for the erection of transmission tower has to be removed completely and free flow of water should be ensured. |
| 2       | 765 KV                     | AP-7 ✓ | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Cement concrete blocks are to be provided with toe wall in the slope of the bund on both side of the pillar for 15m.            |
| 3       | 765 KV                     | AP-8 ✓ | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Cement concrete blocks are to be provided with toe wall in the slope of the bund on both side of the pillar for 15m.            |
| 4       | 765 KV                     | AP-9   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.  | The debris dumped for the erection of transmission tower has to be removed completely and free flow of water should be ensured. |

|   |        |         |  |   |   |
|---|--------|---------|--|---|---|
| 5 | 765 KV | AP-10   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.  | The debris dumped for the erection of transmission tower has to be removed completely and free flow of water should be ensured. |
| 6 | 765 KV | AP-11   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.  | The debris dumped for the erection of transmission tower has to be removed completely and free flow of water should be ensured. |
| 7 | 765 KV | AP-12   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.  | The debris dumped for the erection of transmission tower has to be removed completely and free flow of water should be ensured. |
| 8 | 765 KV | AP-13   | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Cement concrete blocks are to be provided with toe wall in the slope of the bund on both side of the pillar for 15m.            |
| 9 | 765 KV | AP-13/1 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.  | The debris dumped for the erection of transmission tower has to be removed completely and free flow of water should be ensured. |

|    |        |         |  |   |   |
|----|--------|---------|--|---|---|
| 10 | 765 KV | AP-14   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.  | The debris dumped for the erection of transmission tower has to be removed completely and free flow of water should be ensured. |
| 11 | 765 KV | AP-14/1 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Cement concrete blocks are to be provided with toe wall in the slope of the bund on both side of the pillar for 15m.            |
| 12 | 765 KV | AP-16   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.  | The debris dumped for the erection of transmission tower has to be removed completely and free flow of water should be ensured. |
| 13 | 765 KV | AP-17   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.  | The debris dumped for the erection of transmission tower has to be removed completely and free flow of water should be ensured. |
| 14 | 765 KV | AP - 35 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.  | The debris dumped for the erection of transmission tower has to be removed completely and free flow of water should be ensured. |

|    |        |         |  |  |  |
|----|--------|---------|--|--|--|
| 15 | 765 KV | AP-36   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River. | The debris dumped for the erection of transmission tower has <del>to be removed</del> completely and free flow of water should be ensured. |
| 16 | 765 KV | AP-36/1 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River. | Transmission tower near approach road formed to be removed.  |
| 17 | 765 KV | AP-37   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River. | The debris and Construction Waste Materials to be removed.   |
| 18 | 765 KV | AP-38   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River. | The obstructions to be removed below the tower portion.  |
| 19 | 765 KV | AP-39   | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River. | The obstructions to be removed below the tower portion.  |
| 20 | 765 KV | AP-40   | Erection of Transmission Tower completed | Transmission tower constructed in the Water side of Bund Toe.            | River Bund Protection works.   |

|    |        |       |  |  |   |
|----|--------|-------|--|--|---|
| 21 | 765 KV | AP-41 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.                       | The obstructions to be removed below the tower portion.       |
| 22 | 765 KV | AP-42 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.                       | Debris deposited for the Construction of Tower to be removed. |
| 23 | 765 KV | AP-42 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.                       | Debris deposited for the Construction of Tower to be removed. |
| 24 | 765 KV | AP44  | Erection of Transmission Tower completed | Transmission tower constructed in the 2 legs in River Bed & 2 legs in Toe of the Bund portion. | Debris clean and bund to be strengthened                      |
| 25 | 765 KV | AP-45 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.                       | Obstruction below tower should be cleaned                     |

|    |        |       |  |  |   |
|----|--------|-------|--|--|---|
| 26 | 765 KV | AP-46 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River. | Obstruction below tower should be cleaned           |
| 27 | 765 KV | AP-47 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River. | Obstruction below tower should be cleaned           |
| 28 | 765 KV | AP-48 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River. | Obstruction below tower should be cleaned           |
| 29 | 765 KV | AP-49 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River. | Debris and obstructions below towers to be removed. |
| 30 | 765 KV | AP-50 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River. | Obstruction below tower should be cleaned           |

|    |        |        |  |   |   |
|----|--------|--------|--|---|---|
| 31 | 765 KV | AP-51. | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | Debris and obstructions below towers to be removed. |
| 32 | 765 KV | AP-52  | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | Debris and obstructions below towers to be removed. |
| 33 | 765 KV | AP-53  | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | Obstruction below tower should be cleaned           |
| 34 | 765 KV | AP-54  | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | Obstruction below tower should be cleaned           |
| 35 | 765 KV | AP-55  | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | Obstruction below tower should be cleaned           |

|    |        |       |  |   |  |
|----|--------|-------|--|---|--|
| 36 | 765 KV | AP-56 | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | The obstructions to be removed below the tower portion.            |
| 37 | 765 KV | AP-57 | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | The obstructions to be removed below the tower portion.            |
| 38 | 765 KV | AP-78 | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | Erected in the Right of way necessary protection works to be done. |
| 39 | 765 KV | AP-79 | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | Erected in the Right of way necessary protection works to be done. |
| 40 | 765 KV | AP-80 | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | <u>Bund Portion damaged to be strengthened.</u>                    |

|    |        |         |  |   |  |
|----|--------|---------|--|---|--|
| 41 | 765 KV | AP-81   | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | Erected in the Right of way necessary protection works to be done. |
| 42 | 765 KV | AP-82   | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | Erected in the Right of way necessary protection works to be done. |
| 43 | 765 KV | AP-82/1 | Erection of Transmission Tower completed | Transmission tower constructed in the left bank of River bed of Kosasthalaiyar River. | Erected in the Right of way necessary protection works to be done. |
| 44 | 765 KV | AP-82/2 | Erection of Transmission Tower completed | Transmission tower constructed in the River bed of Kosasthalaiyar River.              | Erected in the Right of way necessary protection works to be done. |
| 45 | 765 KV | AP-84   | Erection of Transmission Tower completed | Transmission tower constructed in the out of PWD Boundary.                            | Out of PWD Boundary  |

|    |        |         |  |   |   |
|----|--------|---------|--|---|---|
| 46 | 765 KV | AP-85   | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Bund Portion damaged to be strengthened.            |
| 47 | 765 KV | AP-85/1 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Debris and obstructions below towers to be removed. |
| 48 | 765 KV | AP-86   | Erection of Transmission Tower completed | Transmission tower constructed in the River Bed of Kosasthalaiyar River.  | Debris and obstructions below towers to be removed. |
| 49 | 765 KV | AP-87   | Erection of Transmission Tower completed | Transmission tower constructed in the River Bed of Kosasthalaiyar River.  | Debris and obstructions below towers to be removed. |
| 50 | 765 KV | AP-88   | Erection of Transmission Tower completed | Transmission tower constructed in the River Bed of Kosasthalaiyar River.  | Debris and obstructions below towers to be removed. |

|    |        |       |  |  |  |
|----|--------|-------|--|--|--|
| 51 | 765 KV | AP-89 | Erection of Transmission Tower completed | Transmission tower constructed in the 2 legs in River Bed & 2 legs in Toe of the Bund portion. | River Bund Protection works.             |
| 52 | 765 KV | AP-90 | Erection of Transmission Tower completed | Transmission tower constructed in the 2 legs in River Bed & 2 legs in Toe of the Bund portion. | River Bund Protection works.             |
| 53 | 765 KV | AP-91 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bed of Kosasthalaiyar River.                       | River Bund Protection works.             |
| 54 | 765 KV | AP-92 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bed of Kosasthalaiyar River.                       | Obstructions below towers to be removed. |
| 55 | 765 KV | AP-93 | Erection of Transmission Tower completed | Transmission tower constructed in the Toe of the Bund portion of Kosasthalaiyar River.         | River Bund Protection works.             |

|    |        |         |  |   |  |
|----|--------|---------|--|---|--|
| 56 | 765 KV | AP-94   | Erection of Transmission Tower completed | Transmission tower constructed in the River Bed of Kosasthalaiyar River.  | River Bund Protection works.             |
| 57 | 765 KV | AP-95   | Erection of Transmission Tower completed | Transmission tower constructed in the PWD Boundary area.                  | Inside the River bed                     |
| 58 | 765 KV | AP-96   | Erection of Transmission Tower completed | Transmission tower constructed in the River Bed of Kosasthalaiyar River.  | Inside the River bed                     |
| 59 | 765 KV | AP-97   | Erection of Transmission Tower completed | Transmission tower constructed in the River Bed of Kosasthalaiyar River.  | Obstructions below towers to be removed. |
| 60 | 765 KV | AP-97/1 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Bund Portion damaged to be strengthened. |
| 61 | 765 KV | AP-97/2 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | River Bund Protection works.             |

|    |        |          |  |   |   |
|----|--------|----------|--|---|---|
| 62 | 765 KV | AP-98    | Erection of Transmission Tower completed | Transmission tower constructed in the River Bed of Kosasthalaiyar River.  | Debris and Obstructions below towers to be removed. |
| 63 | 765 KV | AP-99    | Erection of Transmission Tower completed | Transmission tower constructed in the River Bed of Kosasthalaiyar River.  | Debris and Obstructions below towers to be removed. |
| 64 | 765 KV | AP-100   | Erection of Transmission Tower completed | Transmission tower constructed in the River Bed of Kosasthalaiyar River.  | Bund strengthened. Portion                          |
| 65 | 765 KV | AP-100/1 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Not affecting the flow                              |
| 66 | 765 KV | AP-100/2 | Erection of Transmission Tower completed | Transmission tower constructed in the PWD Boundary area.                  | Not affecting the flow                              |
| 67 | 765 KV | AP-101   | Erection of Transmission Tower completed | Transmission tower constructed in the PWD Boundary area.                  | Not affecting the flow                              |

|    |        |        |  |   |   |
|----|--------|--------|--|---|---|
| 68 | 765 KV | AP-102 | Erection of Transmission Tower completed | Transmission tower constructed in the PWD Boundary area.                  | Not affecting the flow                                  |
| 69 | 765 KV | AP-103 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Obstructions below tower and Bund Portion strengthened. |
| 70 | 765 KV | AP-104 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Debris and Obstructions below towers to be removed.     |
| 71 | 765 KV | AP-105 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Bund strengthened. Portion                              |
| 72 | 765 KV | AP-106 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Not affecting the flow                                  |
| 73 | 765 KV | AP-107 | Erection of Transmission Tower completed | Transmission tower constructed in the River Bund of Kosasthalaiyar River. | Not affecting the flow                                  |

|    |        |          |  |   |                        |
|----|--------|----------|--|---|------------------------|
| 74 | 765 KV | AP-107/1 | Erection of Transmission Tower completed | Transmission tower constructed in the PWD Boundary area | Not affecting the flow |
|----|--------|----------|--|---|------------------------|

### **Observations (Proposal I & II):**

- All 20 Nos. of transmission towers (7 Nos of 765KV and 13Nos. of 400KV) are located in Ennore Creek Backwaters Area of Kosasthalaiyar River.
- The Tower No. AP-4, AP-7 to be erected across backwater. The Tower AP-8 is located in the backwaters of Kosasthalaiyar River.
- The TANTRANSCO Officials informed that the land portion in between Buckingham Canal and Back Waters of Kosasthalaiyar River (near the KPL Main Gate) is classified as uppalam (Salt pan land) belongs to Kamarajar Port Limited. It is also suggested that any permanent construction activities should not be carried out by KPL in the above said area
- When comparing the linear water way of Backwater the area occupied by pile cap is meagre, the volume occupied by the pile cap for 765KV (5Nos.) and 400KV (8 Nos.) are 199.40 m<sup>3</sup> and 464.70 m<sup>3</sup> respectively and the total volume of pile caps is 664.10 m<sup>3</sup>. There are sufficient back water vacant land area is available in the site, hence the submersion volume has spread over these vacant land. Considering these aspects, the pile cap of the transmission towers would not have any significant impact on floods in back water of Kosasthalaiyar river which experiences a tidal exchange and it acts as a flood plain during the monsoon season. However, further erection of Towers of 2 Nos. of 765KV and 3Nos. of 400KV, Pile cap should be laid below the bed level

of -1.500 m with respect to MSL is recommended and it could not affect the flow of Ennore Creek Backwaters.

### **Observation for Proposal III:**

The Scheme of erection of 765KV DC line on DC tower with Hexa zebra conductor from the proposed North Chennai 765 KV Pooling station to Ariyallur (Villupuram) 765/400KV Substation has been Sanctioned vide G.O (Ms) No. 312 Dated: 26.11.2018.

These Tower lines are erected along Kosasthalaiyar River Bed & Bank portions from Edayanchavadi village to Vembedu Village towards upstream side of Kosasthalaiyar River. The 74 no's of towers has been constructed before 2018. It is observed that TNEB as violated the terms & conditions of PWD, WRD., mentioned in the G.O(Ms) No.312, Dated:26.11.2018.

The complaine report is submitted as follows.

- The tower no's AP-6, AP-9, Ap-10, AP-11, AP-12, AP-13, AP-14, AP-16, AP-17, AP-35, AP-36, AP36/1, AP-37, AP-38, AP-39, AP-41, AP-42, AP-43, AP-45, AP-46, AP-47, AP-48, AP-49, AP-50, AP-51, AP52, AP-53, AP-54, AP-55, AP-56, AP-57, AP-78, AP-79, AP-80, AP-81, AP-82, AP-82/1, AP-82/2, AP-86, AP-87, AP-88, AP-91, AP-92, AP-94, AP-96, AP-97, AP-98, AP-99, AP-100 (49 no's) were located in the river bed and causing hindrance to the free flow of water. And violating the condition no-IV mentioned in the GO as "***There should not be any hindrance to the free flow of water through the existing river to the downside***".
- The tower no's AP-7, AP-8, AP-13, AP-14/1, AP-40, AP-44, AP-85, AP-85/1, AP-89, AP-90, AP-93, AP-97/1, AP-97/2 were erected in the bund of Kosasthalaiyar river and the bund has been disturbed and damaged. Which needs to be restored original standard. These 13 no's of towers erected inside the river side of the bund are violating the condition no -VII mentioned in the GO as "***While Constructing the***

*pillar in front of the bund toe, the bund will be protected from the erosion of which, Cement Concrete block of Rough stone Revetment is to be provided with toe wall in the slope of bund for both sides of pillar for a length of 15m, thereby the erosion will be protected".*

- The tower no's AP-6, AP-9, AP-10, AP-11, ~~AP-13/1~~, AP-14, AP-16, AP-17, AP-35, AP-36, AP-37, AP-42, AP-43, AP-44, AP-49, AP-50, AP-52, AP-53, AP-55, AP-56, AP-57, AP-86, AP-87, AP-88, AP-92, AP-97, AP-98, AP-99, AP-103, AP-104 (30 No's) were constructed and the waste materials, debris, Dumped soil were not removed and damaged the river structure and hence violating the condition no -XVI & XVII mentioned in the GO as "**Condition no- XVI: After the completion of the work, the waste materials used should be removed completely and Condition no- XVII: After the completion of the work, the damaged portion of the river structure if any, should be set right and restored to the original condition.**

**Action taken by the WRD., for addressing public representation through advisory committee.**

1. During the Site Inspection on 14.07.2022, the WRD Officials gave oral instructions to TANTRANSCO Officials to remove the approach road laid towards the erection of transmission towers and completely remove the dumped earth and debris which are completely submerged under water before the onset of North East Monsoon. Also in the completed work it was observed that debris and dumped earth still present in the site which have to be removed completely and damaged river and bund portion has to be restored to its original standard as per guidance of WRD Engineers.
2. The WRD Officials gave instructions to TANTRANSCO Officials to stop the work of erection of transmission towers once the onset of North East Monsoon and the work shall be resumed only after the end of North East Monsoon season.
3. The WRD has proposed the construction of training walls for an estimate amount of Rs. 146.48 Crores on North and South of Ennore sea mouth aiding the sustainable opening of Ennore sea mouth by which all the flood discharges from various water bodies like North Buckingham Canal, Kosasthalaiyar river, surplus course of Puzhal Reservoir and back waters of Kosasthalaiyar river will be easily confluenceing towards the Bay of Bengal.
4. With regard to various pollution aspects in the backwaters of Kosasthalaiyar river by North Chennai Thermal Power Station (NCTPS), the Hon'ble National Green Tribunal has given directions to stop the dumping of fly ash in the backwaters of Kosasthalaiyar river and to restore the backwaters of Kosasthalaiyar river to its original standards. Accordingly WRD has submitted an estimate to NCTPS for the work of Dredging of backwaters of Kosasthalaiyar river from Atthipattu bridge to confluence of Ennore creek which amounts to Rs.28.00 Crores. This

- work will enhance carrying capacity in the backwaters of Kosasthalaiyar river and restore the ecosystem of Ennore creek.
5. A comprehensive study has to be made to assess the flood carrying capacity and deviation in the tidal flow of waterbodies like Buckingham Canal, Kosasthalaiyar river and backwaters of Kosasthalaiyar river which has occurred due to the construction of transmission towers at the Ennore wetland complex.
  6. The transmission towers which are laid within the Kosasthalaiyar River, Decreasing the linear waterway of the Kosasthalaiyar river, at that specific locations the river width must be Widened to the previous existing linear water way and by providing the flood protection wall to be constructed for ensuring free flow in the Kosasthalaiyar river.

*[Signature]*  
22/7/12  
Executive Engineer, WRD.,  
Araniyar Basin Division,  
Chepauk, Chennai-5

*[Signature]*  
22/7/12  
Executive Engineer, WRD.,  
Kosasthalaiyar Basin Division,  
Thiruvallur.

*[Signature]*  
22/7/12  
Superintending Engineer, WRD.,  
Palar Basin Circle,  
Chepauk, Chennai-5.

*[Signature]*  
Chief Engineer, WRD.,  
Chennai Region,  
Chepauk, Chennai-5.



RL.Srinivasan RL.srinivasan &lt;rlsrinivasanrlsrinivasan@gmail.com&gt;

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**Illegal ongoing encroachment of Kosasthaliyar floodplains at Ennore Village by TANTRANSCO amidst NGT's order to remove temporary structures in the event of monsoon- Request for Action.**

4 messages

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RL.Srinivasan RL.srinivasan <rlsrinivasanrlsrinivasan@gmail.com>

7 December 2022 at 17:42

To: secy-moef@nic.in, ro.moefccc@gov.in, roefcccl@gmail.com, forsec@tn.gov.in, tndoe@tn.gov.in, tn@envvis.nic.in, collrtr@tn.gov.in, deeambattur@gmail.com

Date: 07.12.22

To: The Secretary,  
Ministry of Environment, Forests and Climate Change  
Indira Paryavaran Bhavan, Jor Bhagh Road, Aliganj  
New Delhi 110001  
[secy-moef@nic.in](mailto:secy-moef@nic.in)

To: Deputy Director General of Forests (C),  
Ministry of Env., Forest and Climate Change, Integrated Regional Office,  
Ist and IInd Floor, Handloom Export Promotion Council, 34, Cathedral Garden Road, Nungambakkam,  
Chennai – 34  
[ro.moefccc@gov.in](mailto:ro.moefccc@gov.in), [roefcccl@gmail.com](mailto:roefcccl@gmail.com)

To: The Secretary (E&F)  
Government of Tamil Nadu  
Secretariat, Chennai 600009  
Email: [forsec@tn.gov.in](mailto:forsec@tn.gov.in)

To: Director (Environment)/Member Secretary, TNCZMA  
Panagal Building  
Saidapet, Chennai 600015  
Email: [tndoe@tn.gov.in](mailto:tndoe@tn.gov.in) , [tn@envvis.nic.in](mailto:tn@envvis.nic.in)

To: The District Collector/  
Chairperson, District Coastal Zone Management Authority (CZMA)  
Thiruvallur  
Email: [collrtr@tn.gov.in](mailto:collrtr@tn.gov.in)

To: District Environment Engineer/Member Secy, District CZMA  
Tamil Nadu Pollution Control Board  
77 South Avenue, Ambattur Industrial Estate, Chennai 600058  
Email: [deeambattur@gmail.com](mailto:deeambattur@gmail.com)

Date: 07.12.2022

Respected Sir/Madam

**Subject: Illegal ongoing encroachment of Kosasthaliyar floodplains at Ennore Village by TANTRANSCO amidst NGT's order to remove temporary structures in the event of monsoon- Request for Action.**

The National Green Tribunal in the matters of OA No. 93 of 2022 (SZ) & OA No. 67 of 2022 (SZ) relating to violations in ongoing construction of electrical transmission towers in North Chennai pertaining to 765kV and 400kV transmission lines on 10.11.2022 has directed TANTRANSCO as follows- *“We direct the 1st respondent to immediately remove the temporary structures and make clear the way for the water to flow freely saving the city from one more deluge”* . The NGT order dated 10.11.2022 is attached in (Annexure 1).

However, TANTRANSCO has illegally laid access roads inside Kosasthaliyar floodplains area of Ennore Village at Survey Number 252 for erection of transmission tower in an unapproved location at CRZ IA GPS co-ordinates 13°15'45.06"N, 80°19'20.82"E , unapproved by CRZ clearance dated 01 November 2019 instead of removing the already laid roads to comply with the above mentioned NGT order. Photographs dated 04.12.2022 of the encroachment are attached in (Annexure 2). Map showing illegal laying of access road leading to location that is not along the approved alignment of the transmission line system is shown in (Annexure 3).

It is to be noted that the floodplains hold water now (as shown in the pictures) and this ongoing illegal reclamation works by dumping construction debris, foreign soil has encroached and reclaimed the floodplains.

The Indian Meteorological department has forecasted “cyclonic storm and heavy rainfall” in Northern part of Tamilnadu. Given these forecasts, the highest alert- a red warning (meaning ‘take action’) will reign over the state on Friday, December 9.

In the event of intense rainfall, the existing encroachment will aggravate flooding and hence speedy action is required. We request you to direct TANTRANSCO to comply with the NGT order dated 10.11.22 and remove the illegal encroachments- “road” at Kosasthaliyar floodplains area of Ennore Village and to take action as per law against the offender.

Thank you  
Kumaresan, Ennore  
R.L. Srinivasn, Ennore

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### 3 attachments

-  **Annexure 1- NGT order dated 10.11.22.pdf**  
185K
-  **Annexure 2- Paraval encroachment photos dated 4.2.22.pdf**  
1352K
-  **Annexure 3 -Map.pdf**  
3422K

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**Mail Delivery Subsystem** <mailer-daemon@googlemail.com>  
To: rlsrinivasanrlsrinivasan@gmail.com

7 December 2022 at 17:42

## Address not found

**Item No. 09(i) & (ii):**

BEFORE THE NATIONAL GREEN TRIBUNAL  
SOUTHERN ZONE, CHENNAI

**Original Application No. 93 of 2022 (SZ)**

**&**

**Original Application No. 67 of 2022 (SZ)&**

**I.A. No. 162 of 2022(SZ)**

(Through Video Conference)

IN THE MATTER OF

R.L. Srinivasan, Chennai

...Applicant(s)

*Versus*

Tamil Nadu Transmission Corporation & ors.

...Respondent(s)

With

Kumaresan Sooluran, Thiruvallur

...Applicant(s)

*Versus*

Tamil Nadu Transmission Corporation & ors.

...Respondent(s)

**Date of hearing: 10.11.2022.**

**CORAM:**

**HON'BLE SMT. JUSTICE PUSHPA SATHYANARAYANA, JUDICIAL MEMBER**

**HON'BLE DR. SATYAGOPAL KORLAPATI, EXPERT MEMBER**

**O.A. No. 93 of 2022(SZ)**

For Applicant(s):

Mr. A. Yogeshwaran

For Respondent(s):

Dr. Kuna Suryanarayana for R2

**O.A. No. 67 of 2022(SZ)**

For Applicant(s):

Mr. A. Yogeshwaran

For Respondent(s):

Dr. Kuna Suryanarayana for R2

Mr. Sai Sathya Jith for R3.

Dr. D. Shanmuganathan for R4 and R5.

**ORDER**

1. As per earlier order dated 10.10.2022, we had directed the 1<sup>st</sup> respondent to remove the temporary structures put up for erection of towers in view of the North-East monsoon giving them liberty to reconstruct the temporary structure for erecting the towers after the monsoon is over.
2. In obedience to the order, though they have removed the temporary passages from the river, the Learned Counsel for the applicant has produced photographs stating that in many places debris remained as such, particularly in between two towers the temporary passage laid is left untouched. He also pointed out that only the shallow gravel was removed which is visible from the photographs and they have not removed the debris to the original depth.
3. As the Meteorological Department has forewarned of heavy rainfall for the whole of this week, we direct the 1<sup>st</sup> respondent to immediately remove the temporary structures and make clear the way for the water to flow freely saving the city from one more deluge.
4. Post the matter on 16.12.2022.

.....J.M.  
(Smt. Justice Pushpa Sathyanarayana)

.....E.M.  
(Dr. Satyagopal Korlapati)

O.A. No. 93/2022(SZ)&  
O.A. No. 67/2022(SZ) &  
I.A. No. 162/2022(SZ)  
10th November, 2022. (AM)

Annexure 1- Photos dated 04.12.22 of illegal road laid by TANTRANSKO



Annexure 1- Photos dated 04.12.22 of illegal road laid by TANTRANSKO



**Annexure 1- Photos dated 04.12.22 of illegal road laid by TANTRANSKO**



# Illegal ongoing encroachment of Kosasthaliya floodplains at Ennore Village by TANTRANSSCO

