

**BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE BENCH AT CHENNAI
APPEAL NO. 18 OF 2020 (SZ)**

IN THE MATTER OF:

SRIDEVI DATLA

...APPELLANT

VERSUS

UNION OF INDIA & ORS.....RESPONDENTS

ADDITIONAL AFFIDAVIT ON BEHALF OF THE APPLICANT

I, Sridevi Datla, wife of Mr. DRSS Kumar Varma, aged about 50 Years, resident of Door No. 10-37-11, Ramanagar, Visakhapatnam-530002, Andhra Pradesh, do hereby solemnly affirm and state as under:

1 That in addition to the Reply already filed by me on 02.08.2021. I am detailing certain additional facts and submission which are relevant to the issue in hand and may be treated as a part and parcel of my said Reply.

2 At Serial No. 9 of Section (III) Environmental Sensitivity of Form 1, the question that is asked whether there is any area occupied by sensitive man-made land uses (hospitals, schools, place of worship, community facilities). The project proponent however chose not to give any details despite the fact there is one 980 bedded Super Specialty Hospital, 17 dispensaries/hospitals, 260 schools and 12 higher educational institutions located within 10 kilometers radius of the project site.

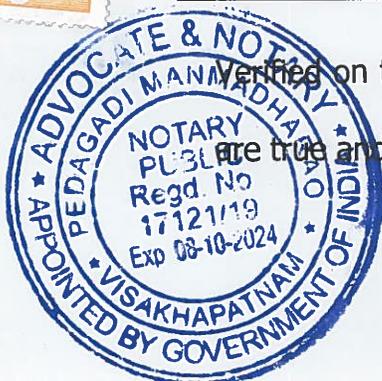
Lists of the above are being Enclosed as ANNEXURE 1

In view of the facts and circumstances as detailed above it is prayed that this Tribunal may be kind enough to pass necessary Orders in the matter.

Sridevi
DEPONENT

VERIFICATION

Verified on this 06/8/2024 that the contents of the above mentioned affidavit are true and correct and nothing material has been concealed therefrom.



PEDAGADI MANMADHARAO
BA, B.L.M.A (E COLLUM MED)
ADVOCATE & NOTARY PUBLIC
(Appointed by Govt of India)
Ministry of Law Affairs, NEW DELHI
D.No 44-18-1/4/2, Thatchetlapalem
VISAKHAPATNAM 5300016
Ph. No. 9442168703 9542225470

ATTESTED
[Signature]
NOTARY
VISAKHAPATNAM
ANDHRA PRADESH
INDIA

Sridevi
DEPONENT



LIST OF 260 SCHOOLS WITH IN 10 KILOMETRES RADIUS OF THE PROJECT SITE

S.N	SCHOOL NAME	LOCATION
1	MPPS NARUPETA	AMATAM RAVIVALASA
2	MPPS BHOGALPURAM (R)	BHOUGHAPURAM
3	MPPS BHOGAPURAM	BHOUGHAPURAM
4	MPPS BHOGAPURAM BC C	BHOUGHAPURAM
5	MPPS GOLLAPETA	BHOUGHAPURAM
6	MPPS SUNDARAPETA	BHOUGHAPURAM
7	MPPS KOYYAPETA	BHOUGHAPURAM
8	MPPS APPANNAPETA	BHOUGHAPURAM
9	MPPS KOLLIPETA	BHOUGHAPURAM
10	MPPS SIMMAPETA	BHOUGHAPURAM
11	MPPS CH K GOLLAPETA	BHOUGHAPURAM
12	INDIRA PRIYADARSINI PRIMARY SCHOOL	BHOUGHAPURAM
13	CHANDRA VIDYANIKETHAN	BHOUGHAPURAM
14	S S N PUBLIC SCHOOL	BHOUGHAPURAM
15	ZPHS BHOGAPURAM	BHOUGHAPURAM
16	CHANDRA VIDYANIKETHAN	BHOUGHAPURAM
17	INDIRA PURIYA DARSHINI HIGHER SECONDARY	BHOUGHAPURAM
18	MPUPS CHAKIVALASA	CHAKIVALASA
19	MPPS AVALANANDIGAM	NANDIGAM
20	MPUPS NANDIGAM	NANDIGAM
21	MPPS MAHARAJUPETA	RAJAPULOVA
22	MPPS SUBBANNAPETA-11	SUBBANNAPETA
23	MPPS BOYAPALEM	KANCHERU
24	MPPA BMMIDIPETA	KANCHERU
25	MPPS KONGAVANIPALEM	KONGAVANIPALEM
26	MPPS PEDAKONDARAJUPETA	KONGAVANIPALEM
27	MPPS CHINAKONDRAJUPETA	KONGAVANIPALEM
28	MPPS KOTTURU	KONGAVANIPALEM
29	MPPS MUKKAM-11	KONGAVANIPALEM
30	MPPS MUKKAM-1	KONGAVANIPALEM
31	MPUPPS R CHANDRAPETA	KONGAVANIPALEM
32	ZPHS MUKKAM	KONGAVANIPALEM
33	MPPS JAGGAYYAPETA	JAGGAYYAPETA
34	MPPS MUNJERU	MUNJERU
35	MPPS GABUVANIPETA	MUNJERU
36	MPPS METTASABBANNAPI	MUNJERU
37	MPPS SIDARTHA COLONY	MUNJERU
38	MPPS PITTAPETA	MUNJERU
39	MPPS RELLIPETA	MUNJERU
40	PV NIKETAN	MUNJERU
41	ZPHS MUNJERU	MUNJERU
42	MPPS MUGADAPETA	VEMPADAPETA
43	MPPS P CHERAKUPALLE	CHERAKUPALLE

44	AIDED PS K CHERAKUPALLI	CHERAKUPALLE
45	AIDED PS CHITTIVALASA	GUDIVADA
46	AIDED PS CHILLAPETA	GUDIVADA
47	MPPS POLIPALLE	POLIPPLLE
48	MPPS LINGALAVALLASA	POLIPPLLE
49	PMV NEKETHAN	POLIPPLLE
50	ZPHS POLIPALLE	POLIPPLLE
51	MPPS RAJAPULOVA	RAJAPULOVA
52	ZPHS MAHARAJUPETA	RAJAPULOVA
53	MPPS AMATAM RAYAVALLASA	AMATAM RAVIVALASA
54	MPPS DAKKUOETA	AMATAM RAVIVALASA
55	MPPS PINNINTIPALEM	KANCHERU
56	MPPS DIBBALPALEM	KANCHERU
57	MPPS BYREDDIPALEM	KANCHERU
58	MPPS CHEPALAKANCHERI	KANCHERU
59	MPPS YERRAMUSALAYYA	KANCHERU
60	MPPS R KANCHERU	KANCHERU
61	MPPS MUDASALAPETA	KANCHERU
62	ZPHS R KANCHERU	KANCHERU
63	MPPS MARADAPALEM	KAVULAVADA
64	GRACELAND SCHOOL	SAVARAVILLI
65	MPPS GALIPETA	THUDEM
66	MPPS RELIPETA (G)	VEMPADAPETA
67	MPPS BOLLENKULAPALEM	VEMPADAPETA
68	MPPS VEMPADAPETA(G)	VEMPADAPETA
69	MPUPS GUDEPUVALASA	VEMPADAPETA
70	MPPS AMATAM	AMATAM RAVIVALASA
71	MPPS DONKALAPETA	AMATAM RAVIVALASA
72	KGBV BHOGHAPURAM	BHOGHAPURAM
73	MPPS RAVADA	RAVADA
74	MPPS CHINA RAVADA	RAVADA
75	MPPS GOLLAPETA(R)	RAVADA
76	V BHARATHI UPS RAVADA	RAVADA
77	ZPHS RAVADA	RAVADA
78	MPPS VEMPADAPETA	SAVARAVILLI
79	MPPS KUNCHIVANIPETA	SAVARAVILLI
80	MPPS BC SCHOOL SAVARAVILLI	SAVARAVILLI
81	MPUPS SAVARAVILLI	SAVARAVILLI
82	MPUPS UPPADAPETA	SAVARAVILLI
83	MPPS YERUSUPETA	GUDIVADA
84	MPPS SREERAMNAGAR COLONY	GUDIVADA
85	MPPS GUDIVADA	GUDIVADA
86	MPPA JAMMAYYPETA	KAVULAVADA
87	MPPS OEDA JAVYKATADA	KAVULAVADA
88	MPUPS KAVULAVADA	KAVULAVADA
89	MPPS BASAVAPALEM	THUDEM

90	MPPS TUDEM GALIPETA	THUDEM
91	MPPS GOLLAPETA TUDEM	THUDEM
92	SSVN SCHOOL	THUDEM
93	ZPHS TUDEM	THUDEM
94	MPPS POTHAYYAPALEM	CHOLANGIPETA PALEM
95	MPPS DENKADA	DENKADA
96	MPPS DENKADA HC	DENKADA
97	MPPS DENKADA BC	DENKADA
98	MPPS DODDIBADUVA	DENKADA
99	MPPS CHANDAKAPETA	DENKADA
100	ZPHS DENKADA	DENKADA
101	MPPS D R PALEM	DWARAPUREDDIPAI
102	MPPS CHERIPOLAM	DWARAPUREDDIPA
103	MPPS GUNUPURU	GUNUPURU
104	KGBC, DENKADA@MOPADA	MOPADA
105	MPPS NATHAVALASA	NATHAVALASA
105	MPPS JUVVIPADU	SINGAVARAM
107	MPPS MAHANTIPETA	SINGAVARAM
108	MPUPS SINGAVARAM	SINGAVARAM
109	MPPS BODDAVALASA	BODDAVALASA
110	MPPS GEDDAPETA	BODDAVALASA
111	BV NIKETAN BODDAVALASA	BODDAVALASA
112	VBV KENDRAM APSP B VALASA	BODDAVALASA
113	ST.M.P.SCHOOL	BODDAVALASA
114	BPS BODDAVALASA	BODDAVALASA
115	PRAVEENYA U.P.SCHOOL	CHINTALAVALASA
116	AIDED UPS APSP	CHINTALAVALASA
117	APSP HS	CHINTALAVALASA
118	MPUPS D TALLAVALASA	D. TALLAVALASA
119	MPPS GANTALAM- H	GANTLAM
120	MPPS JONNADA	JONNADA
121	MPPS AKULAPETA	JONNADA
122	MPPS DUVVUPETA	JONNADA
123	MPPS GOLAGANIPETA	JONNADA
124	ZPHS JONNADA	JONNADA
125	MPPS BANGARURAJUPETA	BANGARRAJUPETA
126	MPPS T KALLALU	D.TALLAVALASA
127	MPPS GUNDAYYAPALEM	MODAVALASA
128	MPPS VALLURU	MODAVALASA
129	MPPS CH VALLURU	MODAVALASA
130	BAJB SCHOOL MODAVALASA	MODAVALASA
131	MPPS MOPADA – 1	MOPADA
132	MPPS KONDRAJUPETA	MOPADA
133	MPPS JAGANNADHAPURAM	MOPADA
134	MPPS MOPADA SCHOOL	MOPADA
135	ZPHS MOPADA	MOPADA

136	MPPS GUNUPURUPETA	GUNUPURU
137	MPPS YETHAPETA	GUNUPURU
138	SRI VASISTA VIDYANIKETA	GUNUPURU
139	ZPHS GUNUPURUPETA	GUNUPURU
140	MPPS VOMMIDODDI	PINATADIVADA
141	MPUPS PINA TADIVADA	PINATADIVADA
142	MPUPS GODDUPALEM	VEDUOLLAVALASA
143	MPPS AMAKAM	AMAKAM
144	MPPS DIBBAGUDDI	AMAKAM
145	MPPS BELLAM	BELLAM
146	MPPS CHINTALAVALASA	CHINTALAVALASA
147	MPPS CH GUNKALAM	CHINTALAVALASA
148	MPPS VENKANAPETA	CHINTALAVALASA
149	MPPS GANTLAM-1	GANTLAM
150	MPPS PEDADA	PEDADA
151	MPPS GUNDALAPETA	PEDATADIVADA
152	MPPS RAGHUMANDA	RAGHUMANDA
153	ZPHS RAGHUMANDA	RAGHUMANDA
154	MPPS VEDULLAVALASA	VEDULLAVALASA
155	MPPS YATHAPETA	AKKIVARAM
156	MPPS AKKIVARAM	AKKIVARAM
157	MPPS GOLLALAPETA	AKKIVARAM
158	MPPS M KALLALU	AKKIVARAM
159	MPPS AKKIVARAM SCHOOL	AKKIVARAM
160	SVP SCHOOL	AKKIVARAM
161	VVNIKETAN AKKIVARAM	AKKIVARAM
162	ZPHS AKKIVARAM	AKKIVARAM
163	MPPS BANTUPALLI	BANTUPALLE
164	MPPS GOMPAVANIPETA	BANTUPALLE
165	MPPS GOLAGAM	GOLAGAM
166	MPPS R TAMMAPURAM	RAJULA TAMMAPURAM
167	MPPS KONADA	KONADA
168	MPPS BG PETA	KONADA
169	MPPS BV PETA	KONADA
170	ZPHS KONADA	KONADA
171	MPPS MATCHAVANIPALEM	KOPPERLA
172	MPUPS K KOPPERLA	KOPPERLA
173	ARDAR UPS KOPPERLA	KOPPERLA
174	APSWRS P KOPPERLS	KOPPERLA
175	MPPS NADIPALLI	NADIPALLE
176	MPPS P NADIPALLI	NADIPALLE
177	ST UPS NADIPALLI	NADIPALLE
178	MPPS KOTTURU	CHINTAPALLI
179	MPPS BOORAPETA	KONADA
180	MPPS VELUDURU	KONADA
181	MPPS KILUGUPETA	KONADA

182	MPPS KR PETA DPEP	KONADA
183	MPPS TIPPALAVALASA	KONADA
184	ZPHS TIPPALAVALASA	KONADA
185	MPPS CHINA PASUPAM	PASUPAM
186	MPPS MARRIPETA	PASUPAM
187	MPPS PASUPAM	PASUPAM
188	ZPHS PASUPAM	PASUPAM
189	MPPS KOLLAYAVALASA	PULIGEDDAPETA
190	MPPS YERUKONDA	YERUKONDA
191	MPPS VIJAYAMPURAM	MAJJIVALASA
192	MPPS KARAGNIPETA	MAJJIVALASA
193	MPPS MAJJIVALASA	MAJJIVALASA
194	MPPS LAXMIPURAM	MAJJIVALASA
195	SHALOM EMS MAJJIVALASA	MAJJIVALASA
196	ZPHS LAXMIPURAM	MAJJIVALASA
197	ZPHS MAJJIVALASA	MAJJIVALASA
198	MPPS YERRAYPALEM	ANNAVARAM
199	MPPS PYLAPETA	ANNAVARAM
200	MPUPS ANNAVARAM	ANNAVARAM
211	MPPS PATHAPALEM	CHIPPADA
212	MPPS JEERUPALEM	CHIPPADA
213	MPPS KOSANAVANIPALEM	CHIPPADA
214	MPPS KANCHERUPALEM	CHIPPADA
215	MPUPS CHINANAGAMAYYAPALEM	CHIPPADA
216	MPUPS PEDANAGAMAYYAPALEM	CHIPPADA
217	MPUPS CHIPPADA	CHIPPADA
218	S.S.SARSWATHI VN PS CHIPPADA	CHIPPADA
219	ST.JOSEPHS SCHOOL	CHIPPADA
220	MPPS PATHA MULAKUDDU	MULAKUDDU
221	THE SUN SCHOOL KETINP	MULAKUDDU
222	RAGHU TALENT HS DAKAMARRI	DAKAMARRI
223	CATHERINE PUB SCHOOL	MULAKUDDU
224	CATHERINE PUB SCHOOL MULAKUDDU	MULAKUDDU
225	CATHERINE PUB HS MULAKUDDU	MULAKUDDU
226	MPPS ALLUPETA	DAKAMARRI
227	MPPS DASARIPETA	DAKAMARRI
228	MPPS MUDDADAPETA	DAKAMARRI
229	MPPS DAKAMARRI	DAKAMARRI
230	MPPS MAJJIPETA	DAKAMARRI
231	RAGHUTALENT SCHOOL DAKAMARRI	DAKAMARRI
232	ZPHS MAJJIPETA	DAKAMARRI
233	MPPS NARAYANARAJUPETA	NARAYANARAJUPET
234	MPPS NARAYANARAJUPETA	SINGANABANDA
235	MPPS MADDILAPETA	SINGANABANDA
236	MPUPS KRISHNAMRAJUPETA	SINGANABANDA
237	MPPS CITYNAGARAM	CHIPPADA

238	MPPS KEETINPETA	MULAKUDDU
239	MPPS REKHAVANIPALEM	MULAKUDDU
240	MPPS MARADAPALEM	MULAKUDDU
241	MPPS TALLAVALASA	TALLAVALASA
242	MPPS YETHAPETA	TALLAVALASA
243	MPPS RAYANIPETA	TALLAVALASA
244	MPS CHITTILLA AGRAHRAM	TALLAVALASA
245	MPPS JEERUPETA	AMANAM
246	MPS N V KALLALU	AMANAM
247	MPPS AMANAM	AMANAM
248	ZPHS AMANAM	AMANAM
249	MPPS SYINADA	AYINADA
250	MPPS LINGANNAPETA	B.R.TALLAVALASA
251	MPPS BOTSAPETA	B.R.TALLAVALASA
252	MPPS B. TALLAVALASA	B.R.TALLAVALASA
253	ZPHS B.R.TALLAVALASA	B.R.TALLAVALASA
254	MPPS BUDDIVALASA	BUDDIVALASA
255	MPPS BUDDIVALASA AGA	BUDDIVALASA AGAR
256	MPPS GEDDAPETA	KORADA
257	MPPS DUVVUPETA	KORADA
258	MPPS KORADA	KORADA
259	OAKRIDGE INTERNATIONAL SCHOOL	MAHARAJUPETA
260	AMEYA WORLD SCHOOL	SANGIVALASA

MPPS - MANDAL PARISHAD PRIMARY SCHOOL

MPUPS - MADAL PARISHAD UPPER PRIMARY SCHOOL

ZPHS - ZILLA PARISHAD HIGH SCHOOL



SUPER SPECIALITY 980 BEDDED HOSPITAL within 10 KILOMETERS RADIUS OF PROJECT SITE .

NRIIMS ,Sanghivalasa Bheemilipatnam was started in the year 2012 with the intent to educate and groom qualified doctors who can contribute to the society. The institution is under the affiliation of Dr.NTR University of Health Sciences. Spread across 10.75 lakh sq.ft the campus includes the college, hospital, staff quarters and hostels.

The Medical College have sanctioned with 150 seats of MBBS and 66 seats of PG courses. The existing infrastructure can serve up to 200 MBBS seats.

It is attached to Anil Neerukonda Hospital that has 980 beds, 200+doctors,advanced labs and Diagnostic centres including MRI and CT Scan.

List of hospitals within 10 kilometers Radius of Project site

- 1 Community Health Centre - Bhogapuram
- 2.PHC - Denkada
- 3 SURYA NURSING HOSPITAL -Tagarapuvalasa
- 4.PADMAVATHI NURSING HOSPITAL Tagarapuvalasa
- 5 VIJAY HOSPITAL- Tagarapuvalasa
- 6 AROGYA HOSPITAL- Tagarapuvalasa
- 7.Dr PRASAD HOSPITAL-Tagarapuvalasa
- 8.ESI HOSPITAL-Tagarapuvalasa
- 9 MOTHER THERESA HOSPITAL- Tagarapuvalasa
- 10 DR RAMAKRISHNA HOSPITAL- Tagarapuvalasa
- 11 UNIT HOSPITAL - Jonnada
- 12 RANGURI RAMBABU HOSPITAL-Tagarapuvalasa
- 12MUKHYAMANTRI e - Eye AROGYA KENDRAM - BHOGAPURAM
- 13 Dr YOGANAND CHILDRENS Hospital -BHEEMUNIPATNAM
- 14 V G NAIDU CLINIC - Tagarapuvalasa
- 15 NAIDU HOSPITAL- BHEEMUNIPATNAM
- 16 GIMSR Speciality OPD CENTRE -BHEEMUNIPATNAM
- 17 GPHC - Bheemunipatnam

**LIST OF 12 HIGHER EDUCATIONAL INSTITUTES ,ENGINEERING ,PHARMACY etc
within 10 Kilometers of Project site .**

- 1 Miracle Educational Group of Institutions - Munjeru village -Bhogapuram
- 2 Avanti Institute of Engineering and Technology- cherukupalli - Bhogapuram
- 3 Avanti Institute of Pharmaceutical sciences- Cherukupalli -
- 4 Anil Neerukonda Institute of Technology and Sciences -Sanghivalasa
- 5 Lendi Institute of Engineering and Technology- Jonada.
- 6 Lendi Institute of Engineering and Technology- Thagarapuvalasa
- 7 Praveenya Institute of Marine Engineering- Dakamarri
- 8 Raghu College of Pharmacy - Dakamarri
- 9 Raghu Engineering College - Dakamarri
- 10 Raghu Institute of Technology - Dakamarri
- 11 Vizag Institute of Technology - Dakamarri
- 12 MVGR Engineering college - CIntalavalasa