

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE AT  
CHENNAI**

(Under Sections 16(h) read with 18(1) of the National Green Tribunal Act,  
2010)

**Appeal No. 77 of 2025**

K. Saravanan

...Appellant

Vs.

The Tamil Nadu Coastal Zone Management Authority & Ors. ...Respondents

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//Certified to be True Copies of the respective originals//

Dated this the 27<sup>th</sup> day of January, 2026



Through

A.Yogeshwaran

Counsel for the Appellant

Ph : 9566254546 | Email : yogeshwaranadv@gmail.com

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...Respondents

**AFFIDAVIT**

I, K. Saravanan, S/o Kasinathan, aged about 43 years, residing at No. 30, Urur Kuppam, Besant Nagar, Chennai – 90, do solemnly affirm and sincerely state as follows:

1. I am the Appellant and am aware of the facts and circumstances of the case, and I am competent to affirm this affidavit. I am filing the present affidavit to bring into record certain information that are necessary for the fair adjudication of the case.
2. It is admitted that the 2<sup>nd</sup> Respondent Project Proponent has commenced activity in the fragile wetland using JCBs and has started digging the wetland and creating embankments in the shallow wetland. The ongoing activity is destroying fragile coastal wetlands in the ecosystem which is sought to be protected by virtue of this Appeal. It is necessary to submit that this is bird migration and nesting season and the wetland is hosting migratory birds. The ongoing activity is causing stress and disturbance to the biodiversity of the wetland.
3. The damage caused by the Respondent cannot be offset, undone or compensated in terms of money. The ecosystem cannot be restored. Interim relief as sought in the appeal ought to be considered by the

P. n. S. S. S.

Hon'ble tribunal. Photographs taken on 23.01.2026 of the project site is annexed as **Annexure A-17**.

4. I submit that copies of the Appeal were served on the Respondents including the project proponent on 22.12.2025. The copy of the email has already been submitted to this Tribunal and also enclosed along with this affidavit as **Annexure A-18**. The appeal was listed on 24.12.2025 before the Hon'ble Tribunal, wherein the 1<sup>st</sup> Respondent was represented by senior counsel and the 2<sup>nd</sup> Respondent was represented by the standing counsel. A period of more than 35 days has elapsed since notice was accepted and papers were served. However, no replies have been filed.
5. There is urgency in the matter and the precautionary principle demands that damage be prevented before it is caused. It is therefore prayed this Hon'ble Tribunal may be pleased to pass interim orders as prayed for in the appeal and thus render justice.

It is humbly prayed that this Hon'ble Tribunal may be pleased to take this affidavit on record and pass such orders as it deems fit, proper and necessary in the interest of the case, and thus render justice.

Solemnly affirmed and signed his name

This the 27<sup>th</sup> day of January, 2026

At Chennai

  
BEFORE ME  
Raghunand  
KAR/3657/2023

ADVOCATE : CHENNAI



Nemmeli - Thiruporur Rd, Thiruporur, Nemmeli,  
Tamil Nadu 603104, India,

Lat: 12.717238, Long: 80.217898

23 Jan, 26, 10:28 am, Friday



26.86° 4 N





Nemmeli - Thiruporur Rd, Thiruporur, Nemmeli,  
Tamil Nadu 603104, India,

Lat: 12.717235, Long: 80.217962

23 Jan, 26, 10:28 am, Friday



26.88° 304 NE











Office of Yogeshwaran A &lt;officeofyogeshwaran@gmail.com&gt;

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**Service of Appeal papers - K. Saravanan Vs. TNCZMA and Ors. - Filing No. : 3305118007232025**

1 message

**Office of Yogeshwaran A** <officeofyogeshwaran@gmail.com>

Mon, Dec 22, 2025 at 1:22 PM

To: ssjtnpcb@gmail.com, drshanmuganathanoffice@gmail.com, dshanmuganathan@outlook.com

Cc: Yogeshwaran Amarneethi &lt;yogeshwaranadv@gmail.com&gt;

Sir,

The subject mentioned Appeal has been filed challenging the clearance dated 03.12.2025 under the CRZ Notification, 2011 for the proposed formation of reservoir over an extent of 4375 acres under phase I and 2574 acres under phase II by the conversion of tidally influenced backwater / salt marsh into freshwater reservoir.

Please find attached the Appeal in the subject-mentioned case. Kindly treat this as service on the Respondents and acknowledge receipt of the same.

The 1st respondent is TNCZMA and 2nd respondent is WRD Planning and Designs Divisions, Water Resources Department.

Thankyou

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Sincerely,

Yogeshwaran A

Ph no: 9566254546

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 **Appeal Kovalam Reservoir\_compressed.pdf**  
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