

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

**O.A. No. 10 of 2026 (SZ)**

**Ramchandran Nair and Ors.**

**... Applicants**

**VERSUS**

**The Additional District Magistrate and Ors.**

**... Respondents**

**REPLY STATEMENT FILED BY THE 5th RESPONDENT**

**(07<sup>th</sup> April, 2026)**



**M/s. AAV PARTNERS**

**S SARAVANAN**

**E KARTHIKEYAN**

**COUNSEL FOR 5<sup>th</sup> RESPONDENT**

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

**O.A. No. 10 of 2026 (SZ)**

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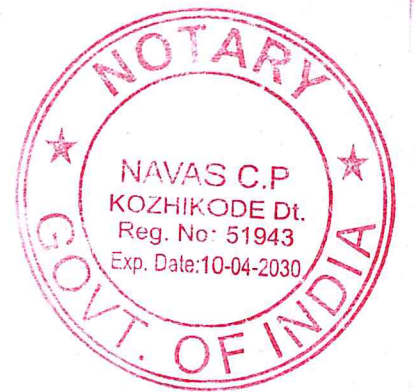
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... Applicants

  
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**VERSUS****1. The Additional District Magistrate**

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**2. The Deputy Chief Controller of Explosives,**

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**3. Varavoor Grama Panchayat**

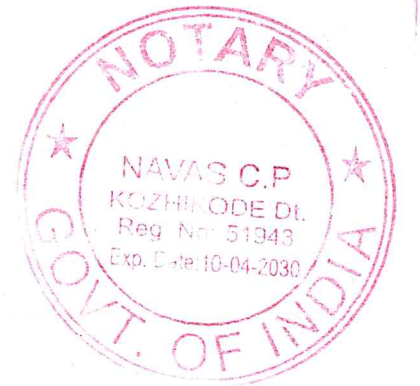
Represented by its Secretary,  
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**4. Kerala State Pollution Control Board,**

Represented by its Chairperson,  
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**5. The Territory Manager (Retail)**

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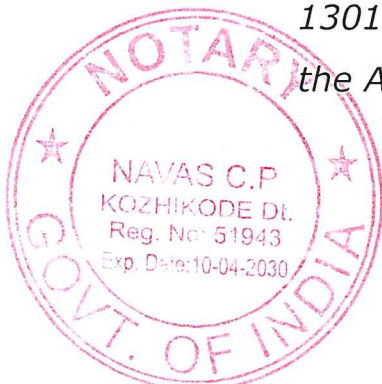
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**... Respondents****REPLY AFFIDAVIT FILED ON BEHALF OF THE 5TH RESPONDENT**

I, M.V.S.N.V. Brahmananda Rao, son of late M.Lakshmi Raja Sekhar, aged 50, years, having office at Retail Territory Office, Bharat Petroleum Corporation Limited, Door No. 2845, YMCA Cross Road, Calicut – 673 001, do hereby solemnly affirm and sincerely state as follows:

1. That I am officiating as the Territory Manager (Retail), Calicut, in M/s. Bharat Petroleum Corporation Limited, the 5th Respondent herein and as such I am well aware of the facts and circumstances of the case and competent to swear this affidavit.
2. That the present Original Application has been filed seeking for the following relief :

*"Prohibit the 5th and 6th Respondents from erecting, commissioning and operating a new Petroleum Retail Outlet at Survey No. 308/2, Thichur Village, Erumapetty Post, Talappilly Taluk, Thrissur District - 680 584, Kerala State in gross violation to the Siting Criteria prescribed by the Central Pollution Control Board (CPCB) in Clause of the Office Memorandum No. B - 13011/1/2019-20/AQM/ 10802-10847 dated 07.01.2020 and the Addendum dated 16.08.2021."*

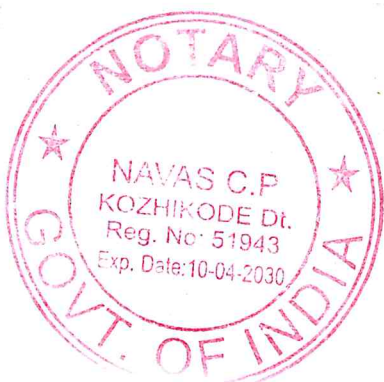



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3. That nothing contained in this Reply Statement shall be construed as an admission of any statement or averment made in the present Original Application save and except what has specifically been admitted by the answering Respondent herein.
4. That the answering Respondent denies each and every averment, which is contrary to and/or inconsistent with what is stated in this statement, as if the same were specifically traversed.
5. That the instant Reply Statement is being filed in order to bring out the true and correct factual position and to specifically deal with the averments and allegations made by the Applicants in the instant Original Application. The answering Respondent reserves his rights and liberty to file a further detailed Statement/Affidavit and additional documents if the situation so necessitates at a later stage.
6. That before traversing into the parawise reply of this Respondent with respect to the allegations raised in the application, it is necessary to set out the factual matrix and approvals obtained for the establishment of the subject retail outlet:
  - i. The subject location in Thichoor Village, Desamangalam Block of Thrissur District is a "Class E" market, classified as a rural location. The population density is strictly less than 700 persons per square kilometer.



  
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ii. The proposed site is completely in adherence to the safety distances as required by the concerned statutory bodies. A Non-Designated Residential Area (NDRA) Certificate by the Tahsildar, Talappilly, was duly issued verifying that an area of 50m around the subject site of the RO site/key plan does not fall under a designated residential area as per local laws.


iii. On 20.05.2025, the 1st Respondent issued the No Objection Certificate (NOC) bearing No. DCTSR/4412/2024-C6 under Rule 144 of the Petroleum Rules, 2002.

iv. It is submitted that the requisite final license from PESO has already been granted on 30.12.2025 after due verification of compliance with all prescribed standards, including CPCB norms and other applicable statutory requirements.

v. It is submitted that the retail outlet is proposed to be constructed by installing state-of-the-art equipment with underground tanks and connecting pipelines that can withstand extreme pressures without any leakage and all the safety measures have been implemented and installed at the subject retail outlet, including double walled concrete tanks and high compound walls around the site.

7. It is submitted that in this regard, it is necessary to reiterate the CPCB guidelines dated 07.08.2020 with respect to Siting Criteria :



  
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### **SITING CRITERIA**

"H. *Siting criteria of retail Outlets:*


*In case of siting criteria for petrol pumps new Retail Outlets shall not be located within a radial distance of 50 meters (from fill point/dispensing units/vent pipe whichever is nearest) from schools, hospitals (10 beds and above) and residential areas designated as per local laws. In case of constraints in providing 50 meters distance, the retail outlet shall implement additional safety measures as prescribed by PESO. In no case the distance between new retail outlet from schools, hospitals (10 beds and above) and residential area designated as per local laws shall be less than 30 meters. No high tension line shall pass over the retail outlet."*

8. That the present application is liable to be dismissed on the following grounds :

#### **I. LIMITATION :**

a. That the subject application is liable to be dismissed on the threshold since the same is filed before this Hon'ble Tribunal beyond the period of limitation stipulated under Section 14 of the National Green Tribunal, Act 2010 which is as follows



  
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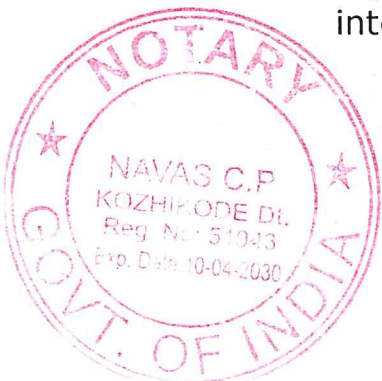



**Section 14 :**

(3) No application for adjudication of dispute under this section shall be entertained by the Tribunal unless it is made within a period of six months from the date on which the cause of action for such dispute first arose:

*Provided that the Tribunal may, if it is satisfied that the applicant was prevented by sufficient cause from filing the application within the said period, allow it to be filed within a further period not exceeding sixty days.*

- b. It is submitted that the applicants had knowledge about the establishment of the subject retail outlet and cause of action first arose as early as on 15.01.2024 when the alleged objections were sent against establishment and the Applicants ought to have filed any application by 15.07.2024, within 6 months as per Section 14 of the Act.
- c. However, a period of 2 years have since passed and the applicants had not approached this Hon'ble Tribunal within the period and had chosen to approach only on 19.01.2026 and therefore, the present Application is liable to be dismissed for being filed much beyond the period of limitation and no sufficient cause has also not been provided, which makes it evident that it is only an application filed with vested interests.



  
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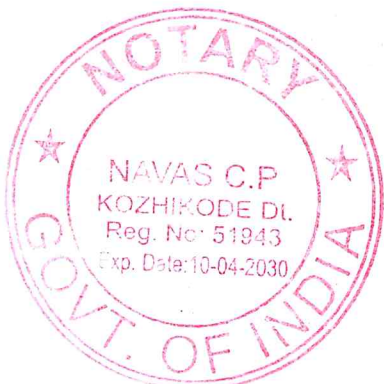
  
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d. It is submitted that the application is squarely barred by the limitation period as prescribed under Section 14(3) of the National Green Tribunal Act, 2010. That even assuming without admitting that the period would start from the date of issuance of the NOC, the Applicants themselves admit in the application that the NOC was issued by the 1st Respondent on 20.05.2025. The statutory period to challenge any environmental aspect relating to the project under Section 14 is 6 months from the date the cause of action first arose. The present Application, has been filed on 19.01.2026, i.e., approximately 8 months after the issuance of the NOC, well beyond the 6-month statutory limit.

## II. Allegation of Proximity to a Water Body:

a. It is humbly submitted that the allegation raised by the Applicants that the proposed site is situated within 50 meters of a water body is entirely baseless, legally untenable, and factually incorrect. It is submitted that the Tahsildar, Talappilly has issued a categorical Certificate dated 08.02.2025 (Ref: No: TLKTPY/2706/2024-A7), clearly certifying that *"there is no water bodies as per revenue records within 50 meters of radial distance from the land comprised in survey number 308/2-1 and 308/2-2 at Thichur Village, Talappilly Taluk, Thrissur District"*.



  
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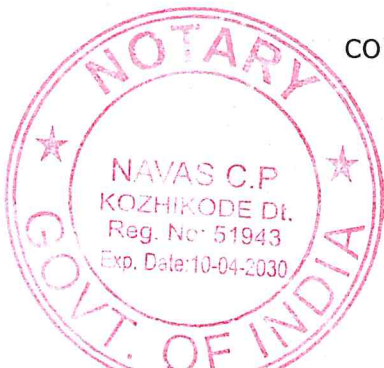
  
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b. The contention of the Applicants that a private "well" within 50 meters constitutes a "water body" under the purview of CPCB siting guidelines is not valid and incorrect. Wells are artificial man made structures and cannot be brought under as natural surface water bodies such as lakes, ponds, streams, rivers, wetlands, canals, and creeks as mentioned under the CPCB Guidelines in the Addendum dated 16.08.2021. Therefore, there is no violation with respect to the retail outlet situated in proximity to any water bodies.

### III. Allegation of Proximity to an Anganwadi:

- a. It is submitted that safety distances from all nearby buildings and establishments are in conformity with statutory requirements and siting criteria. The allegation that an Anganwadi exists within 14.5 meters of the proposed site is misleading and false and the same is denied.
- b. It is submitted that the said Anganwadi did not exist at the subject structure at the time the Non-Designated Residential Area (NDRA) certificate was issued by the Tahsildar, Talappilly for the proposed outlet. At that relevant time, the said building was being utilized merely as a Village Club. The Anganwadi has been shifted to this building only recently on 6.11.2025 and moreover, sufficient distance of 30m is available from the dispensing unit, vent pipe and underground storage tanks of the retail outlet and the compound wall of the Anganwadi.



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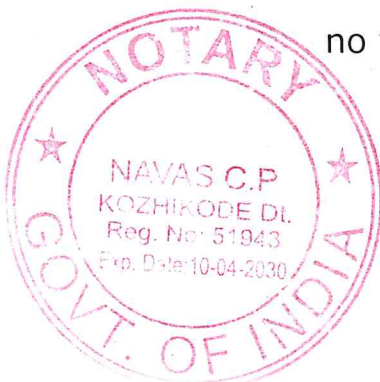
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#### IV. Allegation of Proximity to Residential Buildings:

- a. It is submitted that from the photographs furnished by the applicant, the nearby alleged residential houses are all situated in an area that is not designated as Residential and therefore, the Siting Criteria with respect to CPCB Guidelines will not strictly apply to the said houses.
- b. As per the Non-Designated Residential Area (NDRA) Certificate issued by the competent authority, the RO site/key plan is not classified as a designated residential area as per the local laws.
- c. Furthermore, as stated above, the Thichoor Village location is a Class E market (rural location) with a population density of less than 700 persons per square kilometer. Therefore, the CPCB guidelines will not apply to the said site since the same is not a designated residential area and there is no restriction for the establishment of the retail outlet. It is further submitted that the mere presence of a residential building will not automatically mean the CPCB guidelines will come into play unless or until the area the house is located is designated as a residential area.
- d. Therefore, the construction of the retail outlet is in strict adherence to the NOC issued by the District Magistrate, and no violation has been made on the field.



  
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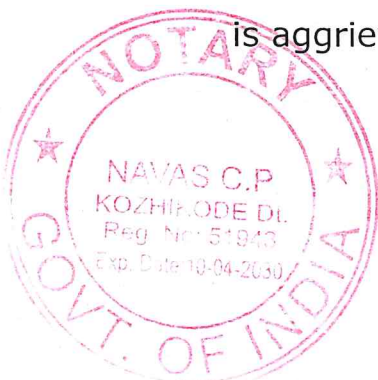



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## V. Safety Standards and Potential Hazards:

- a. It is submitted that all safety standards prescribed to prevent unforeseen hazards are strictly complied with at all times to ensure that there is no hazard to resident neighbors or employees of the said petroleum retail outlet.
  - b. It is submitted that as prescribed in the governing orders, distances from schools, hospitals, and residential areas, along with NOC requirements from fire services, district authorities, and pollution boards, are strictly followed by the Corporation.
  - c. It is submitted that measures to prevent oil spills, including double-walled underground tanks and vapor recovery systems are implemented in the subject site.
  - d. It is submitted that the final grant of license by PESO shall only be upon physical verification of compliance with all these prescribed standards.
9. It is further submitted that the allegation that the 1st Respondent issued the NOC mechanically without conducting an enquiry under Rule 144(5) of the Petroleum Rules, 2002, is vehemently denied. The NOC was issued only after obtaining reports from the Revenue Department, Police Department, Fire Department, and the Local Authority, evaluating possession, traffic density, local area development planning, and public safety and after ensuring that the site complies with the siting criteria. Further, if the Applicant is aggrieved by the NOC issued, the same ought to be challenged



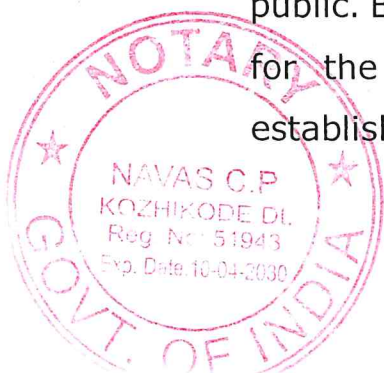
  
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in the appropriate forum and this Hon'ble Tribunal lacks the jurisdiction to check the veracity of any challenge to the NOC.

10. Further, it is also submitted that the Applicants have already approached the Hon'ble High Court of Kerala in Writ Petition (WP(C) No. 2473 of 2025) and the same was filed on March 2025 and when the Hon'ble High Court was not inclined to grant the relief as prayed for, the Applicants chose to withdraw the Writ Petition and approach this Hon'ble Tribunal and this above conduct clearly amounts to forum shopping. Moreover the Applicants have not approached this Hon'ble Tribunal with clean hands nor have they filed the application within the period of limitation and as such the same is liable to be dismissed.
11. It is submitted that this Respondent (BPCL) is a Public Sector Undertaking and is ready and willing to install any additional safety measures as may be directed by this Hon'ble Tribunal or the State Pollution Control Board or any other authority.
12. That, there will be no serious danger to the health and safety of the public, since, this Respondent has taken necessary precautions and safety measures for the establishment of the subject retail outlet.
13. That the retail outlet is dispensing petroleum product i.e. MS and HSD & CNG, which are essential commodity to the motoring public. Besides, huge amount of money is invested by the company for the construction and commissioning of the retail outlet, established in accordance with law.



  
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 BHARAT PETROLEUM CORPORATION LIMITED  
 कालीकट - 673 001 CALICUT - 673 001



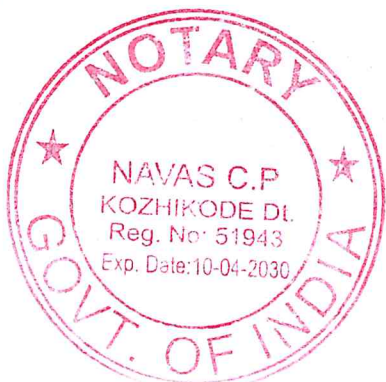
14. That after knowing of all the above, the applicants have approached this Hon'ble Tribunal for vested interest at a premature stage, at the instance of Rival retail outlet dealer and there is no public or environment interest is involved in the present issue, hence the present application is liable to be dismissed with huge cost.
15. That the applicants with an ill intention to stall the operation of the subject retail outlet, has filed the present application and the same is an abuse of process of law. Further, they are not entitled to any relief as claimed in the present application.
16. For the reasons stated above, it is therefore humbly prayed that this Hon'ble Tribunal may be pleased to dismiss the above application with heavy cost and pass such further or other orders as this Hon'ble Tribunal may deem fit and proper in the circumstances of the case and thus render justice.

Dated at Kozhikode on this the 07<sup>th</sup> day of April 2026

Roan

**5<sup>th</sup> RESPONDENT**

एम. वी. एस. एन. वी. ब्रह्मानंद राव  
M. V. S. N. V. BRAHMANANDA RAO  
प्रदेश प्रबन्धक (रीटेल) Territory Manager (Retail)  
भारत पेट्रोलियम कॉर्पोरेशन लिमिटेड  
BHARAT PETROLEUM CORPORATION LIMITED  
कालीकट - 673 001 CALICUT - 673 001



Navas C.P.  
NAVAS C.P  
Advocate & Notary  
Roll No: K/159/2013  
CPM House, Peedikapurayil  
Paroppadi, Kozhikode-673012  
Ph:9496345616

**VERIFICATION**

I, M.V.S.N.V. Brahmananda Rao, son of late M.Lakshmi Raja Sekhar, aged about 50, having address at Apartment No. 8-C, Lifestyle Tower, Near Homeo College, Karapparamba, Calicut, PIN Code- 673010, do hereby verify that the contents of paras 1 to 15 are true to the best of my knowledge and paras 1 to 15 are believed to be true on legal advice and that I have not suppressed any material fact.

Verified at <sup>Kozhikode</sup> \_\_\_\_\_ on this the 07<sup>th</sup> day of April, 2026

Brahmananda

**5<sup>th</sup> RESPONDENT**

एम.वी.एस.एन.वी. ब्रह्मानंद राव  
M.V.S.N.V. BRAHMANANDA RAO  
प्रदेश प्रबन्धक (रीटेल) Territory Manager (Retail)  
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Literate deponent solemnly affirmed and

signed before me at Calicut

On 7/04/2026

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Date 07/04/2026

