

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

Original Application No. 12 of 2025 (SZ)

In the matter of:

Citilights Blessings Apartment Owners Association

... Petitioner

-Vs-

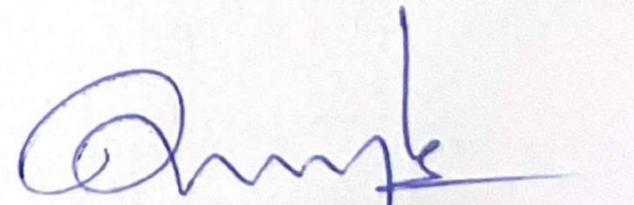
Kelambakkam Village Panchayat & Others

... Respondent

**COUNTER AFFIDAVIT FILED ON BEHALF OF SALT COMMISSIONER
OFFICE, JAIPUR - RESPONDENT NO. 6**

I, C. Raghu, S/o Late Shri. Chakrapani, aged about 59 years, working as the Deputy Salt Commissioner in the Office of the Deputy Salt Commissioner, Chennai, having office at No. 26, Haddows Road, Shastri Bhavan, Nungambakkam, Chennai, do hereby solemnly affirm and sincerely state as follows:

1. I am filing this counter affidavit on behalf of the Respondent No. 6 (Salt Commissioner's Office), herein and as such I am well


(च.रघु / C. RAGHU)
उप नमक आयुक्त
DEPUTY SALT COMMISSIONER
क्षे.का., चेन्नै / R.O., CHENNAI

acquainted with the facts and the circumstances of the case from the records.

2. This respondent denies each and every averment made in the affidavit filed in support of the application as false and incorrect except those that are specifically admitted herein in this Counter Affidavit.
3. The Salt Commissioner's Office (Respondent No. 6) respectfully submits that this counter affidavit in response to Original Application No. 12/2025 filed by the Applicant. The Applicant claims pertain to certain lands situated in Kelambakkam village, Chennai. The Respondent submits the following para-wise reply for the kind consideration of this Hon'ble Tribunal.
4. It is submitted that the subject land situated in Kelambakkam village, along the Kelambakkam-Kovalam Link Road under Survey Number 188 part, was originally under the administrative control of the Salt Commissioner's Organisation (SCO). As per the orders issued by the Department for Promotion of Industry and Internal Trade (DPIIT), Ministry of Commerce & Industry, Government of India, through Salt Commissionerate, the said land measuring 19.03 acres was formally transferred to the Central Public Works Department (CPWD), Government of India, on 19.05.2022. A true copy of the DPIIT order and Mahazar is annexed as annexures. Consequently, as

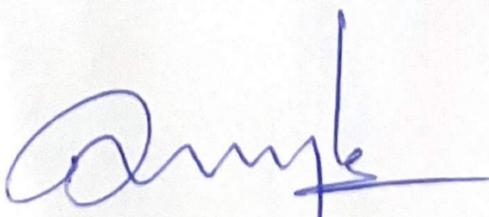


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of this date, the land in question is the property of CPWD, and the Salt Commissioner's Office has no jurisdiction or control over the same.

5. The Respondent No. 6 submits that since the subject land does not vest with the Salt Commissioner's Organization with effect from 19.05.2022, the responsibility for the management and protection of the land now lies exclusively with the transferee department, i.e., CPWD, Government of India. Therefore, no action or liability can be attributed to the Salt Commissioner's Office in this regard.
6. It is reiterated that the subject land has been under the ownership and control of CPWD, Government of India, since 19.05.2022. The land is not a salt pan, nor has it been utilized for salt production. Prior to transfer, the land was classified as a non-salt producing area. The Salt Commissioner's Office has no continuing interest or control over this land.
7. Without prejudice to the specific replies above, the Respondent respectfully submits that the statements, averments, and allegations contained in paragraphs 1, 4 to 7 and 9 to 15 of the Application do not pertain to, nor do they concern, the Salt Commissioner's Office in any manner. These paragraphs relate to matters that are outside the purview, jurisdiction, and functions of this Respondent. Accordingly, no specific reply is warranted from this Respondent in respect of the


(च.रघु / C.RAGHU)
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said paragraphs, and to the extent that any such averments may be construed as referring to this Respondent, the same are specifically denied.

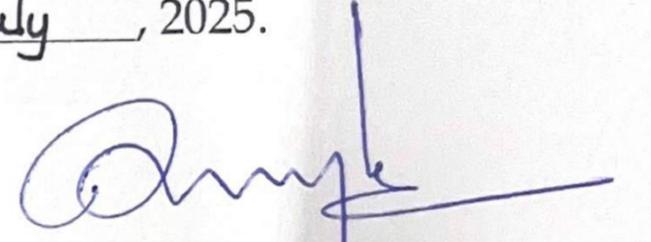
8. The Respondent further submits that the transfer of the subject land to CPWD was carried out strictly in accordance with the Internal Policy Guidelines, 2012, and the orders of the Department for Promotion of Industry and Internal Trade (DPIIT), Ministry of Commerce & Industry, Govt. of India, through Salt Commissionerate. Since the transfer, the Salt Commissioner's Office has/had no jurisdiction, control, or responsibility over the land in question.
9. In view of the above, it is therefore humbly prayed that this Hon'ble National Green Tribunal Court, South Zone, may be pleased to:
 - Discharge the Salt Commissioner's Office (Respondent No. 6 herein) from the present proceedings, as no cause of action survives against it;
 - Direct the Applicant to pursue any grievances relating to the subject land with the appropriate authority, namely the Central Public Works Department (CPWD), Government of India; and
 - Pass such other and further orders as this Hon'ble Tribunal may deem fit and proper in the interests of justice.


(च. रघु / C. RAGHU)
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VERIFICATION

I, C. Raghu, S/o Late Shri. Chakrapani, aged about 59 years, working as Deputy Salt Commissioner in the office of the Deputy Salt Commissioner, Chennai, No. 26, Haddows Road, Shastri Bhavan, Nungambakkam, Chennai, do hereby verify that the contents of this counter affidavit are true and correct to the best of my knowledge and belief. No part of it is false, and nothing material has been concealed therein.

Verified at Chennai on this 25th day of July, 2025.



(**च.रघु / C.RAGHU**)
उप नमक आयुक्त
DEPUTY SALT COMMISSIONER
क्षे.का. चेन्नै / R.O., CHENNAI
6th RESPONDENT

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NATIONAL GREEN TRIBUNAL,
SOUTHERN ZONE, CHENNAI

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...Petitioner

-Vs-

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Others

...Respondent

COUNTER AFFIDAVIT FILED ON
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A. ANURADHA
Counsel for 6th Respondent
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