

BEFORE THE NATIONAL GREEN TRIBUNAL, (SZ),
SITTING AT CHENNAI
O.A. No. 13 of 2024

S. Sivadas

...Applicant

Vs.

The Ministry of Environment and Ors.

...Respondents

REPORT FILED THE 11TH RESPONDENT

I, K. Kumar S/o. Kasi, Aged about 50 years, Director and Authorised Signatory of the 11th Respondent Company having its office at No. 8/57, Sapthaswara Apartments, 1st Avenue Ashok Nagar, Chennai - 600 083 doth hereby solemnly affirm and sincerely submit as follows:

1. I submit that, I am one of the Director of the 11th Respondent Company and as such I am well acquainted with the facts of the case. I submit that, I crave this Hon'ble Tribunal to consider our Reply Statement filed in the Original Application as part and parcel of this Report/Affidavit.
2. I submit that, this Hon'ble Tribunal vide its order dated 06.09.2024 in the above Application had directed us to file every particular detail regarding the lands purchased by us along with its extent. The directive portion of the order is reproduced hereinunder

"8. From the photographs, it appears that the road goes even into the 500 Meters of the HTL. In this regard, we direct the 11th Respondent to file

For MANJU FOUNDATIONS (P) LTD
K. I. S.
Authorised Signatory

every particular with details of the purchase of lands. Let the entire extent of land purchased by them in the area and the extent on which layouts are being developed and also state whether they fall within or outside the prohibited CRZ areas."

3. I submit that, in obedience and in furtherance to the same, we have tabulated herein the details regarding the lands purchased by us along with its Survey Numbers and extent. We have also categorized the Survey Numbers lying under the HTL zone.

ANNEXURE - I


**BHARISHA BEACH, BHINAYA BEACH, BHAVISHYA BEACH &
BHAVITHA BEACH
(FARM LANDS)**

SURVEY NOS.	EXTENT IN ACRES	DATE OF PURCHASE	BELOW 500/ ABOVE 500
195/1 PART	1.57	16.10.2015 & 04.11.2015	(1.48 Acres above 500 mts) (0.09 Acres below 500 mts)
196/5A2B	6.57	16.10.2015	(1.80 Acres above 500 mts) (4.77 Acres below 500 mts)
210/4PART	0.11	16.10.2015	BELOW 500
210/5PART	0.46	16.10.2015	BELOW 500
194/1	0.47	16.10.2015	ABOVE 500
195/3	1.94	16.10.2015	BELOW 500
211/1B	1.58	16.10.2015	BELOW 500

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211/6PART	0.03	16.10.2015	BELOW 500
189/1A PART	0.30	04.11.2015	ABOVE 500
189/3A PART	0.03	04.11.2015	(2 cents above 500 mts) (1 Cent below 500 mts)
189/4A	0.28	04.11.2015	BELOW 500
189/4B1 PART	1.13	04.11.2015	BELOW 500
190/1A PART	3.96	04.11.2015	(1.65 Acres above 500 mts) (2.31 Acres below 500 mts)
194/1 PART	1.26	04.11.2015	ABOVE 500
195/2	0.81	04.11.2015	BELOW 500
195/4D	3.41	04.11.2015	BELOW 500
211/2C	0.99	04.11.2015	BELOW 500
211/3	2.21	04.11.2015	BELOW 500
211/4 PART	2.72	04.11.2015	BELOW 500
211/5 PART	1.22	04.11.2015	BELOW 500
211/6	0.11	04.11.2015	BELOW 500
212/1 PART	1.65	04.11.2015	BELOW 500
212/2 PART	1.68	04.11.2015	BELOW 500

- Total extent of Annexure - I is 34.49 Acres of Farm Lands.
- An extent of 6.97 Acres of lands is lying above 500 mts from HTL.
- An extent of 27.52 Acres of lands is lying below 500 mts from HTL.

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 Authorised Signatory

ANNEXURE - II

**BLUE SPOT - I
(DTCP APPROVED LAYOUT LYING ABOVE 500 MTS)**

Survey Nos.	Extent in Acres	Date of Purchase	BELOW 500/ ABOVE 500
180/9	0.54	12.12.2019	ABOVE 500
181/4B3	0.54	12.12.2019	ABOVE 500
181/5B3	0.16	12.12.2019	ABOVE 500
188/1A	0.22	12.12.2019	ABOVE 500
188/1B	6.28	12.12.2019	ABOVE 500
188/2	3.38	12.12.2019	ABOVE 500
188/3	1.17	12.12.2019	ABOVE 500

- Total extent of Annexure - II is 12.29 Acres of Lands and Buildings.
- The Layout has been approved by DTCP No. 44/2021

ANNEXURE - III

**BLUE SPOT - II
(DTCP APPROVED LAYOUT LYING ABOVE 500 MTS)**

Survey Nos.	Extent in Acres	Date of Purchase	BELOW 500/ ABOVE 500
189/1A1B	2.20	20.03.2023	ABOVE 500
189/1B	0.18	13.09.2023	ABOVE 500
189/2A	0.83	13.09.2023	ABOVE 500
189/2B	0.33	12.12.2019	ABOVE 500

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190/1B1	0.04	13.09.2023	ABOVE 500
190/1B3	1.04	13.09.2023 & 20.03.2023	ABOVE 500
190/2	0.74	20.03.2023	ABOVE 500
190/3	2.49	13.09.2023 & 20.03.2023	ABOVE 500
190/28	1.81	20.03.2023	ABOVE 500
191/1A1	2.57	13.09.2023 & 26.06.2023	ABOVE 500
190/1A4	0.36	20.03.2023	ABOVE 500
191/1B	0.14	20.03.2023	ABOVE 500
191/1C	0.57	13.09.2023 & 20.03.2023	ABOVE 500
191/2A3	0.10	20.03.2023	ABOVE 500
191/2B2	0.05	20.03.2023	ABOVE 500
191/2C2	2.61	20.03.2023	ABOVE 500
193/1A2	1.65	20.03.2023	ABOVE 500

- Total extent of Annexure - II is 17.70 Acres of Lands & Buildings.
- The Layout has been approved by DTCP No. 109/2023

ANNEXURE - IV

**VACANT LANDS
(LYING BELOW 500 MTS)**

Survey Nos.	Extent in Acres	Date of Purchase	BELOW 500/ ABOVE 500
212/3A2	6.28	20.03.2023 & 26.06.2023	BELOW 500
212/3A3	0.55	26.06.2023	BELOW 500

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K. V

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213/4A2	0.01	26.06.2023	BELOW 500
213/4A3	0.05	26.06.2023	BELOW 500
213/4A4	0.06	26.06.2023	BELOW 500
213/4B1B1	0.83	26.06.2023	BELOW 500
213/5	0.22	26.06.2023	BELOW 500

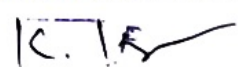
- Total extent of Annexure - IV is 8 Acres of Vacant Lands.
- No permanent structures nor any buildings are situated in Annexure IV lands

ANNEXURE - V

**VACANT LANDS
(LYING ABOVE 500 MTS)**

Survey Nos.	Extent in Acres	Date of Purchase	BELOW 500/ ABOVE 500
174/8	0.15	22.05.2024	ABOVE 500
174/9	0.32	22.05.2024	ABOVE 500
174/10	0.17	22.05.2024	ABOVE 500
174/11	0.16	22.05.2024	ABOVE 500
174/12	0.12	22.05.2024	ABOVE 500
174/13	0.15	22.05.2024	ABOVE 500
174/14	0.62	22.05.2024	ABOVE 500
174/21	0.01	22.05.2024	ABOVE 500

- Total extent of Annexure - V is 1.70 Acres of Vacant Lands.
- No permanent structures nor any buildings are situated in Annexure IV lands.

For MANJU FOUNDATION

 Authorised Signatory

ANNEXURE - VI

**VACANT LANDS
(LYING ABOVE 500 MTS)**

Survey Nos.	Extent in Acres	Date of Purchase	BELOW 500/ ABOVE 500
180/10	0.43	12.12.2019	ABOVE 500
180/11	0.40	12.12.2019	ABOVE 500
180/14A	0.21	12.12.2019	ABOVE 500
181/4B2A	0.19	12.12.2019	ABOVE 500
181/7A2	0.17	12.12.2019	ABOVE 500

- Total extent of Annexure - V is 1.40 Acres of Vacant Lands.
- No permanent structures nor any buildings are situated in Annexure IV lands.

4. I submit that, we have also annexed the Sketch Map of the Layouts and lands purchased by us in Marakanam North Village, Marakkanam Taluk, Villupuram District for effective adjudication and to shed clarity on the subject issue.

Hence for all the above, it is therefore humbly prayed that this Hon'ble Tribunal may be pleased to record the above facts and pass such orders as this Hon'ble Tribunal may deem fit and proper in the circumstances of the case and thus render justice.

Solemnly affirmed at Chennai *
on this the 17th day of October 2024 *
and signed his name in my presence *
after reading the contents of this *
affidavit herein. *

For MANJU FOUNDATION .

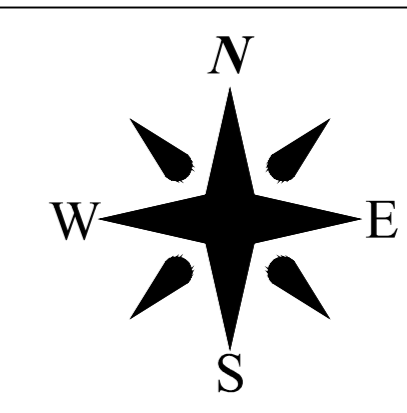
K. K.

Authorised Signatory

BEFORE ME

R.P.
Ms. 3358/23
No. 39, LC/12/
Ch-104.
ADVOCATE

BHARISHA, BHINAYA, BHAVISHYA & BHAVITHA
Survey No: 189/1A1A, 189/3, 190/1A1A1A1A1, 194/1A1A1A,
195/1A, 195/1B1A1, 195/2A1A1, 196/5A2B1A1A, 210/4A,
210/5A1A, 211/1B1A, 211/2C1A1, 211/3A1A1A1, 211/4A1A1A1,
211/5A1, 211/6A, 212/1A1A & 212/2A1A
Total Extent - 34.49 ACRE



1

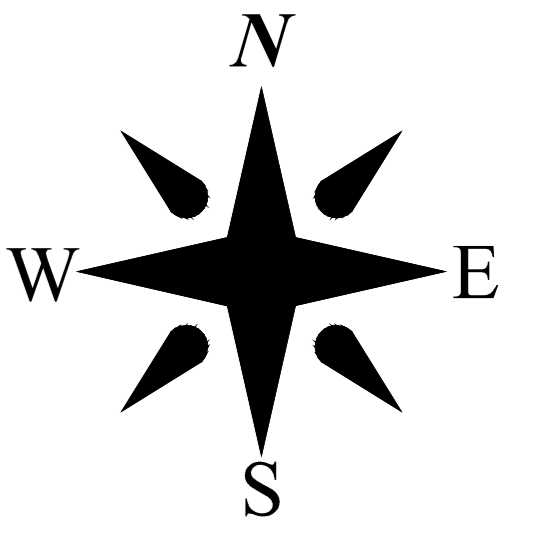


AREA DETAILS		
SURVEY NO	EXTENT (IN ACRE)	
	ABOVE 500 M	BELOW 500 M
189/1A1A	0.30	
189/3	0.02	0.01
189/4A1A1A		0.28
189/4B1AA1		1.13
190/1A1A1A1A1	1.65	2.31
194/1A1A1A	1.73	
195/1A	0.01	0.14
195/1B1A1	0.08	1.34
195/2A1A1		0.81
195/3A1A1A1AA1		1.94
195/4D1A1A1A1A		3.41
196/5A2B1A1A	1.80	4.77
210/4A		0.11
210/5A1A		0.46
211/1B1A		1.58
211/2C1A1		0.99
211/3A1A1A1		2.21
211/4A1A1A1		2.72
211/5A1		1.22
211/6A		0.14
212/1A1A		1.65
212/2A1A		1.68
TOTAL	5.59	28.90


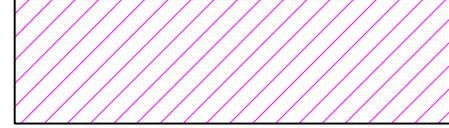
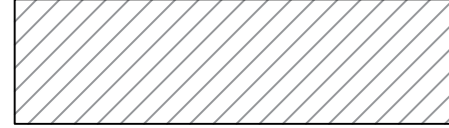

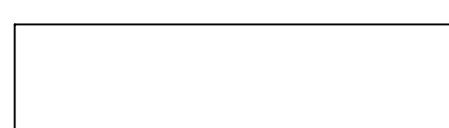
BLUE SPOT - I (Above 500 M From HTL)

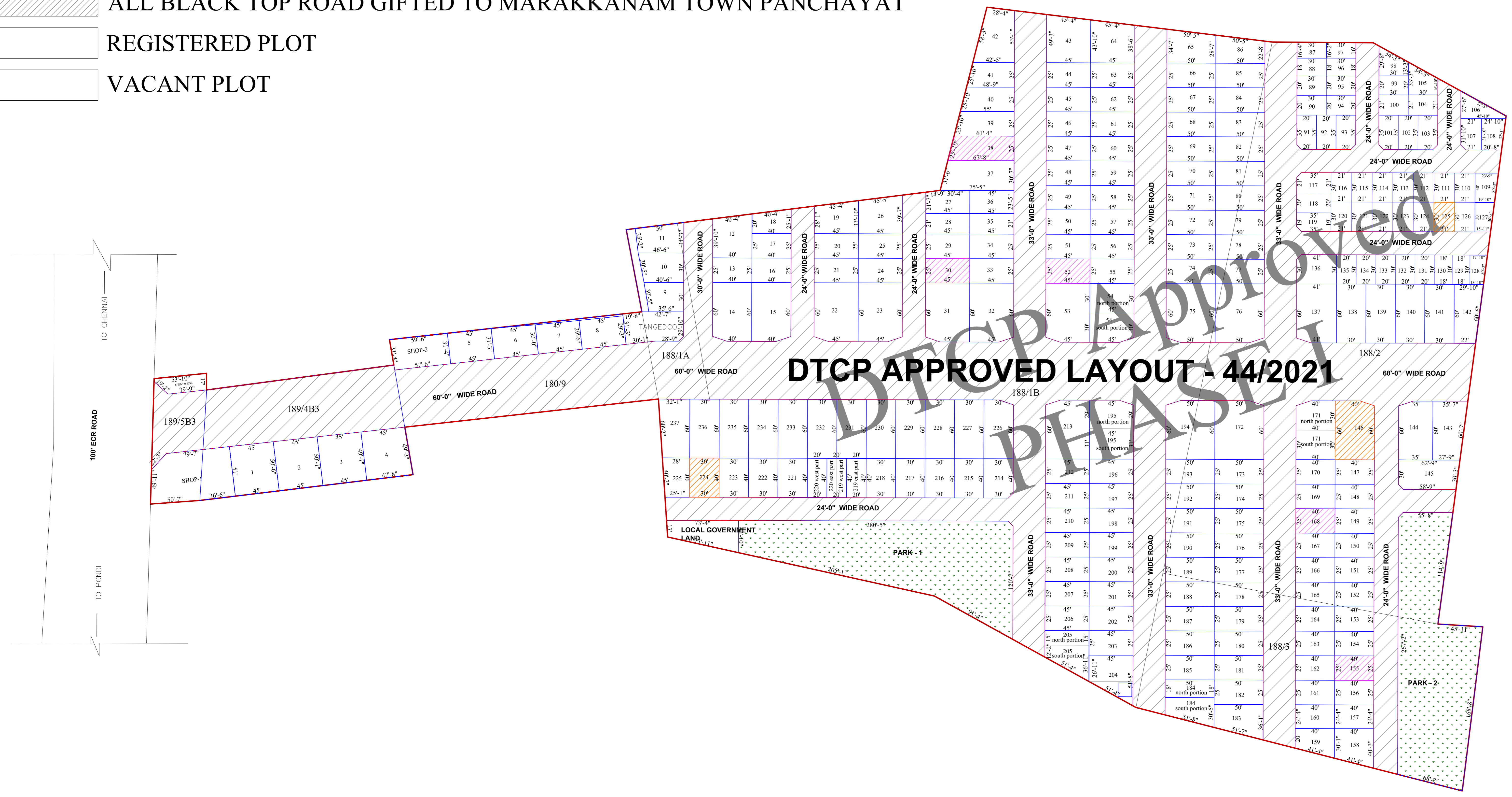
Survey No: 180/9, 181/4B3, 181/5B3, 188/1A, 188/1B, 188/2 & 188/3

Total Extent - 12.29 ACRE



2

-  BUILDING CONSTRUCTION - COMPLETED - 3 UNITS
-  BUILDING CONSTRUCTION - UNDER PROGRESS - 5 UNITS
-  ALL BLACK TOP ROAD GIFTED TO MARAKKANAM TOWN PANCHAYAT
-  REGISTERED PLOT
-  VACANT PLOT

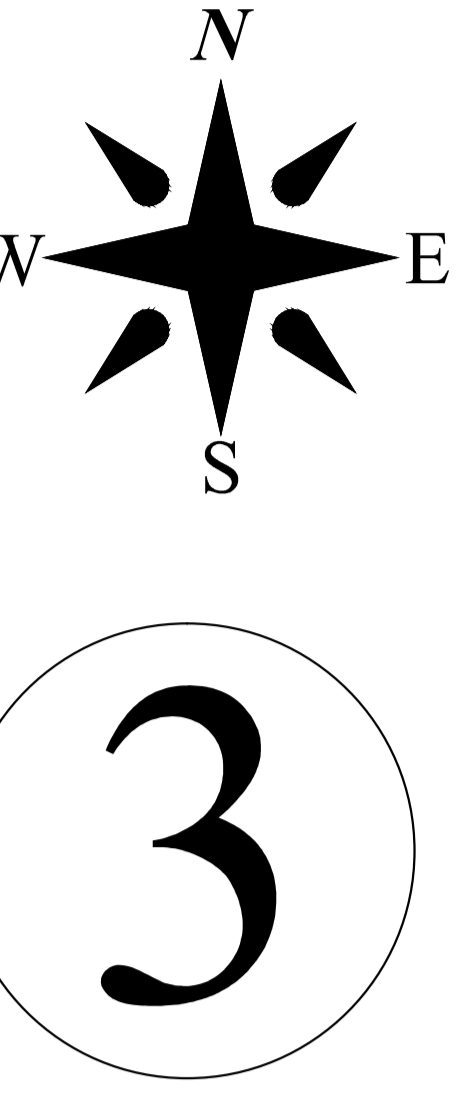


AREA DETAILS	
SURVEY NO	EXTENT (IN ACRE)
180/9	0.54
181/4B3	0.54
181/5B3	0.16
188/1A	0.22
188/1B	6.28
188/2	3.38
188/3	1.17
TOTAL	12.29

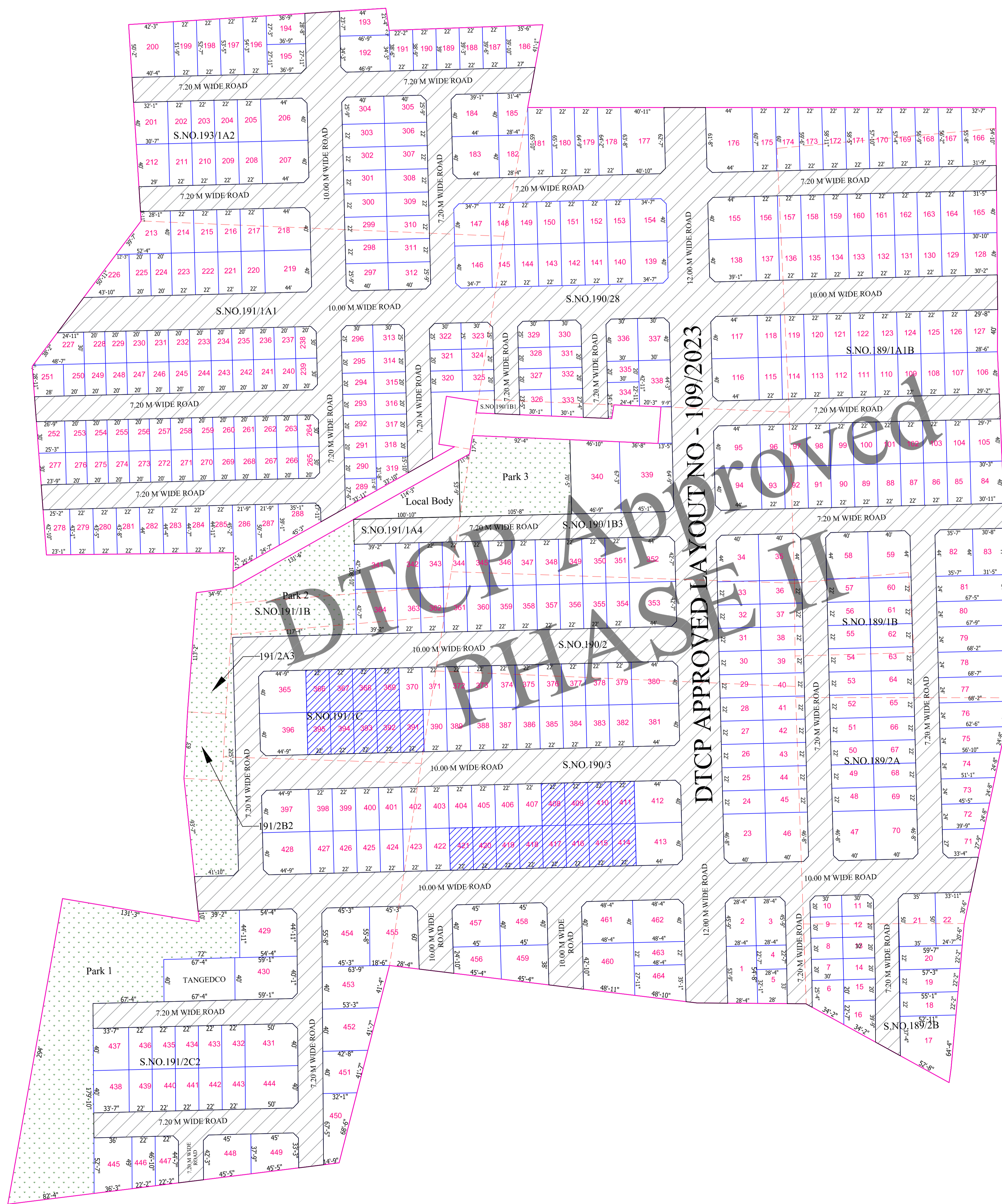
BLUE SPOT - II (Above 500 M From HTL)

Survey No: 189/1A1B, 189/1B, 189/2A, 189/2B, 190/1B1, 190/1B3, 190/2, 190/3, 190/28, 191/1A1, 191/1A4, 191/1B, 191/1C, 191/2A3, 191/2B2, 191/2C2 & 193/1A2

Total Extent - 17.70 ACRE



- BUILDING CONSTRUCTION - UNDER PROGRESS - 21 UNITS
- ALL BLACK TOP ROAD GIFTED TO MARAKKANAM TOWN PANCHAYAT
- REGISTERED PLOT
- VACANT PLOT

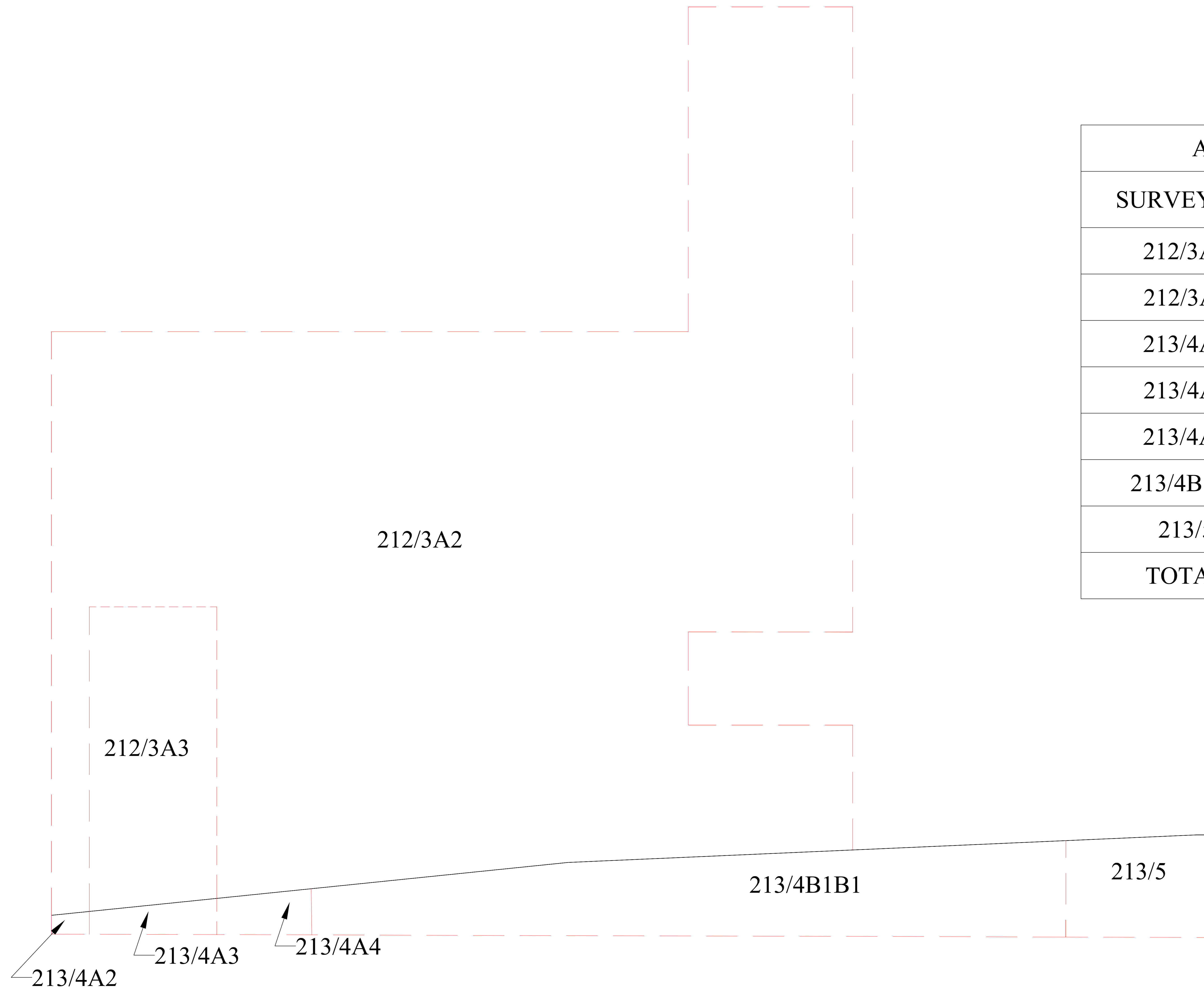
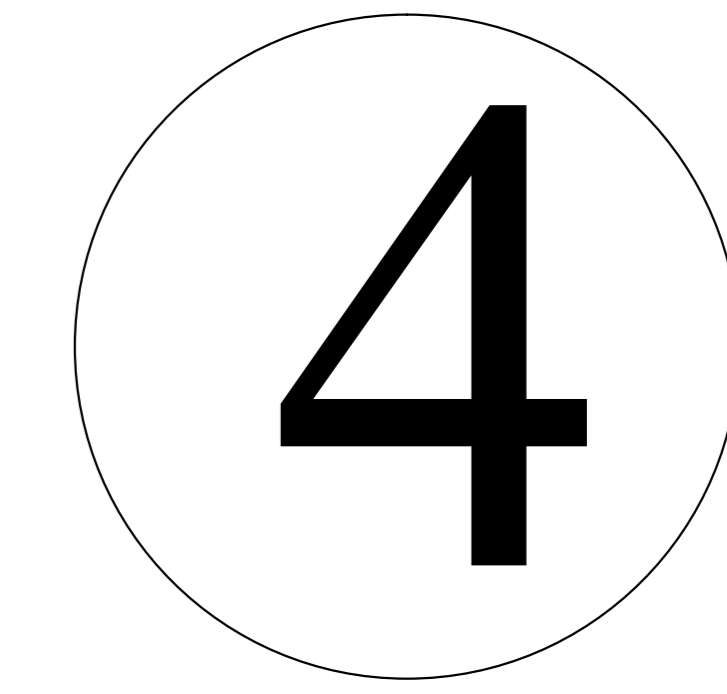
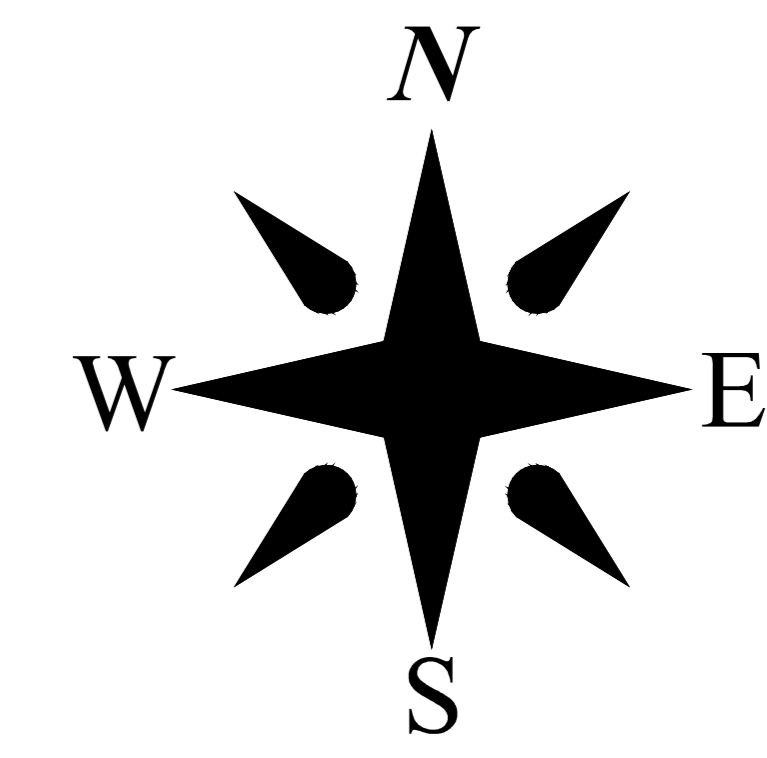


AREA DETAILS	
SURVEY NO	EXTENT (IN ACRE)
189/1A1B	2.20
189/1B	0.18
189/2A	0.83
189/2B	0.33
190/1B1	0.04
190/1B3	1.04
190/2	0.74
190/3	2.49
190/28	1.81
191/1A1	2.57
191/1A4	0.36
191/1B	0.14
191/1C	0.57
191/2A3	0.10
191/2B2	0.05
191/2C2	2.61
193/1A2	1.65
TOTAL	17.70

VACANT LANDS (Below 500 M From HTL)

Survey No: 212/3A2, 212/3A3, 213/4A2,
213/4A3, 213/4A4, 213/4B1B1 & 213/5

Total Extent - 8.00 ACRE



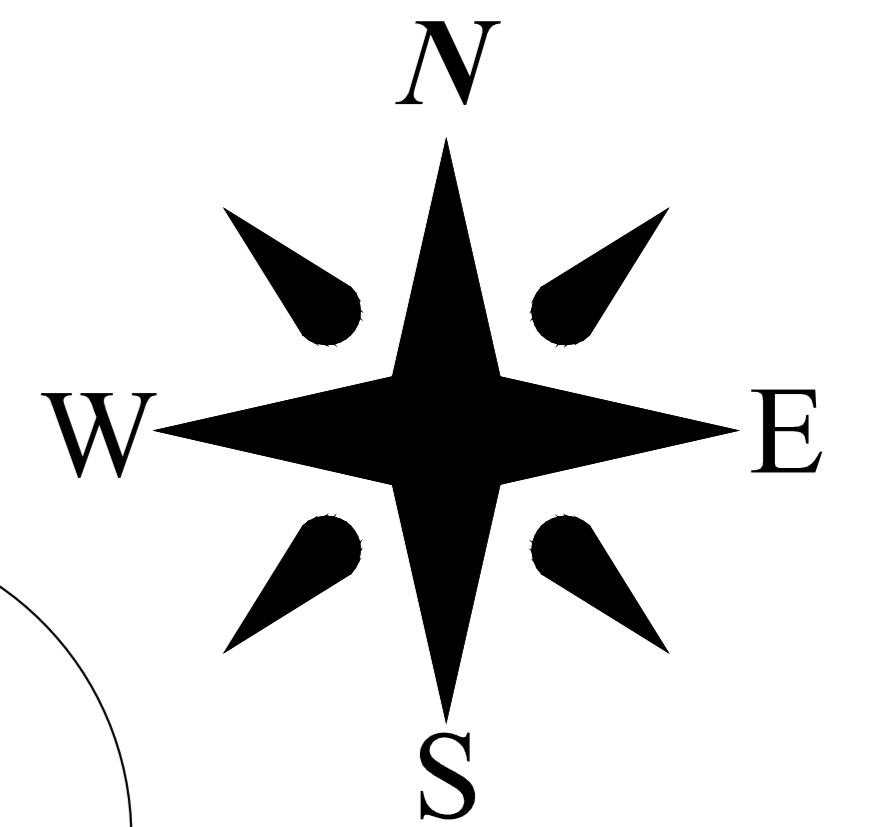
AREA DETAILS	
SURVEY NO	EXTENT (IN ACRE)
212/3A2	6.28
212/3A3	0.55
213/4A2	0.01
213/4A3	0.05
213/4A4	0.06
213/4B1B1	0.83
213/5	0.22
TOTAL	8.00

VACANT LANDS (Above 700 M From HTL)

Survey No: 174/8, 174/9, 174/10, 174/11, 174/12, 174/13, 174/14 & 174/21

Total Extent - 1.70 ACRE

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AREA DETAILS	
SURVEY NO	EXTENT (IN ACRE)
174/8	0.15
174/9	0.32
174/10	0.17
174/11	0.16
174/12	0.12
174/13	0.15
174/14	0.62
174/21	0.01
TOTAL	1.70

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**REPORT FILED BY THE 11TH
RESPONDENT**

M/s. Sarvabhauman Associates
Krishna Prasad R
Shabeer Ali H
Surya Narayanan R
Counsel for 11th Respondent
PH : 8939792974