

BEFORE THE NATIONAL GREEN TRIBUNAL(SZ), SITTING AT CHENNAI

(Under Section 18(1) r/w S. 14 & 15 of National Green Tribunal Act, 2010)

Original Application No. 013 of 2024 (SZ)

Between:

S. Sivadas

Son of SivaKumar Kulasekar,

No.2, Periyapalayathamman Kilo West Street,
Basin Bridge, Washermenpet, Chennai- 600021.

Mob:- 9176869284

Email Id:- taaur@gmail.com

... APPLICANT

- AND -

1.The Ministry of Environment,
Forest and Climate Change
Rep. by its Secretary,
Indira Paryavaran Bhavan
Jorbagh Road New Delhi - 110 003
Email- mefcc@gov.in
Ph No- +91-11-2301196
And 15 others

...RESPONDENTS

WRITTEN SUBMISSION FILED ON BEHALF OF THE 15TH AND THE 16TH RESPONDENTS

It is most respectfully submitted on behalf of the 15th and the 16th Respondents;

1. The Respondents herein deny each and every averment contained in the Counter affidavit of the 4th and the 11th Respondents & the Applicant & the report filed by the 4th and the 11th Respondents, save those that are specifically admitted hereunder. However, no part of the pleadings of the Respondents shall be deemed to be admitted solely by reason of non-traverse and it may be deemed that every averment in the Counter of the Respondents and the Applicant has been specifically set out in seriatim and traversed.

2. The detailed Counter with material documents filed by the Respondents herein shall be treated as part and parcel of this Written Submission.
3. The Respondents herein also deny the allegation of environmental violation by the Respondents herein and puts the Applicant to strict proof thereof, while the Respondents support the allegations of environmental violations caused by Respondent 11 to 14 in pursuit of their intention to unlawfully enrich.
4. The Respondents submit that the Objections dated 22.06.2026 & the averments and prayers in

A. Injunction Petition in IA No. 104/2024 IN OA 13/2024.

B. Petition for Appointment of Advocate Commissioner in IA NO. 28/2025 IN OA 13/2024.

C. Direction petition in IA NO. 29/2025 IN OA 13/2024.

Shall be treated as part and parcel of this submission. The non-filing of counter to the same clearly amounts to admissions of the averments made by the Respondents herein.

5. The Respondent promoter has not filed any document to controvert the claims of environmental violations and promotion of illegal layout.
6. On the other hand, contrary to the contention of the Applicant, the Respondents herein are not in any way associated with the impugned project. In fact, the 15th and the 16th Respondents herein are the joint owners of the lands in S. No. 195/4A(Pt.), 4B(Pt.), 4C(Pt.), 4D (Pt.) measuring about 1.17 Acres and joint owners of the lands in S. No.

211/1B1A measuring about 0.53 Acres. These lands had been purchased vide document number 43/1990 and 1143/1990 duly registered at SRO Marakkanam.

7. The Respondents are not environment aggressors but primarily the Respondents herein are landowners, senior citizens being one of the several victims of the illegal project named Bhinaya Beach and Bhavishya Beach.
8. That originally the Respondents herein had entered into an agreement dated 16.04.2015 with the 11th Respondent for the outright sale of their lands stated above and received a sum of Rs. 50,000/- as advance while the sale consideration was fixed at Rs. 9,50,20,000/- for 1.70 Acres at Rs. 56,000/- per cent.
9. That Manju Foundations had paid a sum of Rs. 5,00,000/- on 21.07.2015 towards additional sale consideration and had paid a total sum of Rs. 5,50,000/-, while so it had encroached on the Respondent 15 and 16's Private Property and converted it into an unapproved and illegal layout by unilaterally leveling the sand dunes in the entire land parcel.
10. Under the above background, with the ulterior motive to harass the Respondents, the builder has preferred a suit for specific performance of the agreement dated 16.04.2015 in O.s. No. 345/2022 before PDJ, Villupuram by falsely claiming that the subject lands are "*Vacant Lands*" in our possession and by forging the signatures of the Respondents herein and by making false pleadings and inventing cause of action. The copy of the Complaint is annexed with the typed set.

- 11.Regarding the illegal layout by annexation of the Respondents lands, the Respondents have also filed a complaint in R.C.P. No. 01/2024 before the Regulatory Authority, TNRERA and obtained interim relief and the said matter is pending for final arguments.
- 12.The layout project named Bhinaya Beach and others (formed by an act of encroachment over public and private lands) continues to stand in violation of CRZ norms, DTCP norms and Environment Protection act 1986, hence originally the Executive officer, Marakkanam Town Panchayat had issued notices dated 29.10.2015 and 11.01.2016 addressed to M/s. Manju Foundations Private Limited regarding the illegal developments made by the said company without obtaining CRZ clearance and DTCP approval over various Survey Numbers including on the lands of the Respondents in S. No. 195/4A(Pt), 195/4B(Pt.), 195/4C(Pt.), 195/4D(Pt.) and 211/1B1A(Pt.) admeasuring about 1.70 Acres, situated in Marakkanam North Village, Marakkanam Taluk, Villupuram District belonging to the Respondents herein.
- 13.It is submitted that it is only recently the Respondents had obtained knowledge of the above referred notices dated 29.10.2015 (**Page No. 24 of the Counter with typed set filed by R15 & R16**) and 11.01.2016 (**Page No. 22 of the Counter with typeset filed by R15 & R16**) issued by the Executive Officer, Marakkanam Town Panchayat.

Based on the knowledge of the same, the Respondents though not a party to the notice, issued a reply letter dated 10.11.2022 to the Executive officer, Marakkanam Town Panchayat (**Page No. 22 of the Counter filed by R15 & R16**), seeking to comply with his own notice dated 29.10.2015

and 11.01.2016 regarding the illegal developments to the extent of the lands in S. No. 195/4A, 195/4B and 211/1B1A and unconditionally accepted removal of the illegal developments of roads and housing plots made over their lands by M/s. Manju Foundations (P) Ltd, as the title for the same vested with them.

14. It is learnt that

- a. the notices were issued as the layout was developed without obtaining planning permission and technical approval as per G.O.M.s No. 134, Municipal Administration and Water Supply Department dated 20.09.2002 and also as the project lands falling within 200 meters of no development zone and within 500 meters of the coastal Regulation Zone and no permission was obtained from Coastal Regulation Zone Management Authority and also on account of violations of section 47(A) of the Town and Country Planning Act 1971.
- b. Form-I notice under section 56 and 57 of the Town and Country Planning Act 1971 has already been served on the Respondent on 18.05.2016.
- c. the Assistant Director of Town and Country Planning, Villupuram Region sent a communication vide Na.Ka. No.161/2016/VR/ dated 01.06.2016 to the Executive Officer to remove the layout stones erected in the unauthorized layout and to remove the A/C sheet roofs built in the subject lands in accordance with G.O. No. 289 Housing and Urban Development Department dated 16.12.2010 and section 56 and 57 of the Town and Country Planning Act 1971.

d. It is learnt that the Executive Officer issued a notice dated 04.07.2016 to the Respondent herein under section 56 and 57 of the Town and Country Planning Act 1971 and Tamil Nadu District Municipalities Act 1920 to remove the layout stones erected in the unauthorized layout and to remove the AC Sheet built in the subject land without obtaining permission from the competent Authorities.

For the reasons known only to the Contesting Respondents, these facts have been suppressed from this Hon'ble Tribunal, hence the guilty parties have not come to court with clean hands and have violated the Doctrine of Clean hands.

15. In the suit for specific performance in O.S. No. 345/2022 (Date of filing of Complaint 09.09.2022), **(Page No. 39 to 50 of the Counter with typed set filed by R15 & R16)** the Respondent builder has averred that the lands under the agreement with the Respondents herein are "Vacant Lands" in their possession, while so in the Proceedings before the Thasildar, Marakkanam in Na.Ka.A2/2142/2022 dated 14.11.2022 **(Page No. 53 to 62 of the Counter with typed set filed by R15 & R16)**, on **10.10.2022, the 11th Respondent promoter had pleaded that**

"மனைப்பிரிவிற்கு பாதை அமைக்கப்பட்டுள்ளதாக தெரிவிக்கப்பட்ட புல எண் 195/4A உரிமை தொடர்பாக இருதரப்பினரும் நீதிமன்றத்தை அணுகியுள்ளனர்".

From the above demonstration, it is clear that the Promoter is repeatedly guilty of misleading and misrepresenting with the sole and conscious intention to get away with its fraudulent activities and to unlawfully enrich itself at the cost of its own customers and the coastal environment by taking the assistance of the Authorities, who are clearly guilty of inaction.

16.It is also seen that the 11th Respondent in the proceedings before the Thasildar in Na.Ka.No.2142/2022 has stated that layout approval application for the projects named Bhinaya beach and others are pending since 22.12.2015 but it pleads before this Hon'ble Tribunal that it has not caused any environmental damage and it only promoted the lands as farm lands in an eco-friendly manner and is patting on its own back.

However, it is clarified that the Respondents are not a signatory to any such application for any environmental clearance or layout approval nor have the Respondents given any authority to any person to seek any approval concerning the lands in S. No. 211/1b1a and 195/4A, 195/4B.

17.The gist of the Order of the Tahsildar Marakkanam in Na.Ka.No.A2/2142/2022 is as follows;

- a. Manju foundations has submitted that it has formed layout road in S. No. 195/4A and there is a title dispute regarding it and it will not undertake any developmental work without clearance from competent authorities, that its application for DTCP approval is pending.
- b. A Part of the lands have been developed by Manju Foundations in housing layout and the remaining lands are lying vacant.
- c. Sand dunes have been levelled beyond 500 meters only.
- d. Order of the Thasildar: That Registration should be done only after obtaining approvals and by following procedure. EB and Building approvals should be granted only by following due process.

18. It is also pertinent to submit that despite our honest representation dated 10.11.2022 the Executive Officer, preferred not to take any action. Hence, we preferred a petition dated 27.12.2022 before the Housing Secretary, The Director, DTCP and the Deputy Director, DTCP, regarding the illegal developments on the Respondents lands, however, till today no action has been taken by these authorities also.

19. Instead of acting as per law, based on its own notices and the letter of the Respondents 15 and 16, the Executive Officer, who is party to this proceeding, alongside the Sub-Registrar, SRO Marakkanam, created an illegal gift deed, without regard to the sand dunes marked in the CZMP, TN95 & the classification of the impugned land as CRZ-III. This act of creating a gift deed for lands which are falling under the CRZ classification for a non-permitted activity under the CRZ Notification, 2011, is against law.

20. The 11th Respondent, realizing the illegality of the project, deliberately preferred not to assess the impact of the illegal project, had flattened the sand dunes and is continuing promoting unapproved housing plots, approved housing plots and unapproved vacant plots (admeasuring to about 20 to 45 cents) by annexing these projects which are contained in a single land bank, thus luring gullible prospects showcasing these mix as varying offers and thus exploiting their customers and the environment with the unfettered assistance of the authorities.

21. It is submitted that although promoted in phases, the project of the 11th Respondent requires prior clearance from the State Level Environment Impact Assessment Authority, as the same is a scheduled activity under the EIA Notification, 2006. The illegal conversion of the coastal lands measuring about 180 Acres, without prior Environmental clearance as per Schedule 8(b) of the EIA Notification, 2006, is an environmental offence.

22. At the risk of repetition it is submitted that **although the projects are promoted in phases and by mixing the varying offerings since they are annexed with each other and form part of a single land bank, and a common agreement between 11th to the 14th Respondents, the map annexed to the gift deed also proves the same, hence the intention to develop the project in phases and as a single unit is made out, thus the impugned projects are attracted by Schedule 8(b) of the EIA Notification, 2006.**

23. It is pertinent to reveal that the entire portions of the gifted lands fall in restricted CRZ-III Zone 0 to 500 meters. The approved Coastal zone management Plan-2011 clearly shows that the site is eco-sensitive with sand dunes.

24. The illegal use of approved layout roads as approach road to the unapproved housing and vacant plot project has put several innocent purchasers and public to trouble and is only creating multiplicity of disputes, while the authorities have been cooperating by creating gift deeds by

violating public policy and not taking any action despite repeated knowledge of the violations.

25. It is seen that although various authorities had issued show cause notice in the year 2015 and 2016, the authorities had failed to pursue further action or impose environmental damages, and the same had further led the 11th Respondent 3 to restart and expand the project by creating gift deeds and today entire 100 Acres in CRZ-III is sold out by the 11th Respondent, without regard to the interim order passed by this Hon'ble Tribunal.

26. The gift deed violates Development control regulations and G.O.(MS). No. 78 dated 04.05.2017 which suggests rules for regularization of unapproved layout and plots, without reference to G.O.(MS). No. 79 dated 04.05.2017 and without following the guidelines, lands classified as agricultural lands are treated as roads under the gift deed.

27. Since the projects in CRZ cannot be regularized, the illegal roads are being obtained as a gift by violating clause 4(2) and 4(6), 5, 7(b) of the G.O.(MS). No. 78 dated 04.05.2017. Thus the authorities themselves are guilty of causing environmental chaos.

28. The formation of layouts and the disputed gift deed violates the Coastal Zone Regulations of the Ministry of Environment and Forest under the Environment (Protection) Act, 1986 (Central Act 29 of 1986), notified in the Gazette of Government of India Extraordinary, Part-II, Section 3, sub-section (ii), dated 6th January, 2011, hence is opposed to public policy and public interest.

29.It can be seen from the Patta annexed to the gift deed that the illegal promoter is only a joint Pattadar, having partial right (if any). Hence there is no legal basis for this document.

MARAKKANAM JOINT PATTA DETAILS
DOC NO: 1361/2026 AS SEEN FROM THE GIFT DEED

S. NO.	PATTA NO.	PATTA NAME	SURVEY NO	EXTENT IN HEC
1	4554	1) Petro Developers Pvt Ltd 2) Kaleena Developers Pvt Ltd 3) Metis Developers Pvt Ltd 4) Arihant Farm Developers	190/1A1A1A 190/21	1.35.19 0.00.15
2	2270	1) Petro Developers Pvt Ltd 2) Nagaraj 3) Loganathan 4) Sathiyamurthy 5) Mohandoss Gandhi 6) Kandhavel 7) Gajapathy 8) Muthukumaran 9) Ezhilarasan 10) Ashok Kumar 11) Ruthramurthy 12) Nandagopal	211/1B1A	0.82.09
3	2269	1)Kaleena Developers Pvt Ltd 2) Petro Developers Pvt Ltd 3) Sathyamurthy 4) Mohandoss Gandhi 5) Kandhavel 6) Gajapathy 7) Ezhilarasan 8) Ashok Kumar 9) Ruthramurthy 10) Nandhagopal 11) Avika Ventures Pvt Ltd 12) N K Surana	210/5A1A	0.41.57
4	2266	1) Kaleena Developers Pvt Ltd 2) Petro Developers Pvt Ltd 3) Vijayakumar	196/5A2B1A	2.23.09
5	2220	1) Kaleena Developers Pvt Ltd 2) Mettis Developers Pvt Ltd 3) Arihant Farm Developers	194/1A1A1	0.56.81
6	643	1) Jayanthi Natarajan 2) Mala Jeyaram 3) S. Balasubramaniyan 4) Pandurangan 5) Chinnarani 6) B. Vijayalakshmi 7) Span Metals Pvt Ltd 8) Shaka Estate & Finance Pvt Ltd 9) Sriraman 10) Ramesh 11) Manju Foundations Pvt Ltd	189/4B2A1A 1	0.64.98

7	602	1) Kamalammal W/o Varadharaju 2) Samikannu S/o Kuppusamy 3) Jeganathan S/o Kuppusamy 4) Thiruvengkadam S/o Kuppusamy 5) Jayanthi Natarajan W/o Natarajan 6) Span Metals Pvt Ltd 7) Manju Foundations Pvt Ltd	195/1A	0.6.00
8	347	1) Span Metals Pvt Ltd 2) Shaka Estate & Finance Pvt Ltd 3) Manju Foundations Pvt Ltd 4) Arihant Farm Developers	189/3B1	0.53.42

None of the Joint Pattadar are party to the gift deed, hence the same is not binding on them/ their rights. The compulsion of the Executive officer to receive the gift deed in violation of law is known only to him.

30. The annexure to the Gift Deed clearly accepts that if it is found later that false statements are made the parties are liable and are subject to legal proceedings by the Registrar, whereas suppressing all facts and the pending proceedings before this Tribunal, the Respondent Promoter, the Sub-Registrar, SRO Marakkanam & the Executive Officer, Marakkanam Town Panchayat have created the gift deed despite having personal knowledge of the interim order of the Hon'ble Tribunal, with due respect the same amounts to contempt of the interim order passed by this Hon'ble Tribunal.

31. **It can be seen from the recitals, that the gift deed is executed for the benefit and usage of the general public as public roads and in compliance with the resolution of Town Panchayat dated 06.09.25, while so, the Joint committee which inspected the site on 12.11.2025 much after the resolution is totally silent about the 50 odd roads formed by the 11th Respondent and also the resolution dated 06.09.2025 which is attached to the gift deed.** The reason for

such unconditional cooperation of the authorities in perpetuating the illegal project is known only to them.

32. It is most pertinent to state that **the Resolution of the Executive Officer Marakkanam and the Board resolution of the 11th Respondent contradict and vary each other**, to demonstrate the same, the table below is created, extracting the relevant particulars from the gift deed;

S.NO	S. NO AS PER SCHEDULE OF GIFT DEED DOC NO: 1361 OF 2026	S.NO AS PER RESOLUTION PASEED BY MANJU FOUNDATION DATED 11/03/2026	AS PER RESOLUTION OF EXECUTIVE OFFICER DATED: 15/09/20026
1	189/1A1A	189/1A1A	189/1A1A
2	189/3A1AA1A	189/3A1AA1A	189/3A1A1A
3	189/3B1	189/3B1	No resolution passed regarding this survey number
4	189/4A1A1A	189/4A1A1A	189/4A1A1A
5	189/4B1AA1A	189/4B1AA1A	189/4B1AA1
6	189/4B2A1A1	189/4B2A1A1	No resolution passed regarding this survey number
7	189/51A1A1A1AA	189/51A1A1A1AA	No resolution passed regarding this survey number
8	190/1A1A1A	190/1A1A1A	190/1A1A1A
9	194/1A1A1	194/1A1A1	194/1A1A1
10	195/1A	195/1A	195/1A
11	195/1B1A	195/1B1A	195/1B1A1
12	195/2A1A1	195/2A1A1	195/2A1A1
13	195/3A1A1A1	195/3A1A1A1	195/3A1A1A1AA1
14	195/4A	195/4A	No resolution passed regarding this survey number
15	195/4D1A1A1	195/4D1A1A1	195/4D1A1A1A1A
16	196/5A2A1	196/5A2A1	196/5A2A1
17	196/5A2B1A	196/5A2B1A	196/5A2B1A1A
18	210/5A1A	210/5A1A	210/5A1A
19	211/1B1A	211/1B1A	211/1B1A
20	211/2A	211/2A	211/2A
21	211/2C1A1	211/2C1A1	211/2C1A1
22	211/3A1A1A1	211/3A1A1A1	211/3A1A1A1
23	211/4A1A1	211/4A1A1	211/4A1A1A1
24	211/5A1	211/5A1	211/5A1
25	211/6A	211/6A	211/6A
26	211/7A	211/7A	211/7
27	212/1A1	212/1A1	212/1A1A
28	212/2A1A1AA	212/2A1A1AA	212/2A1A
29	212/3A1A1A1A1	212/3A1A1A1A1	212/3A1

30	212/3A2A1A1A	212/3A2A1A1A	No resolution passed regarding this survey number
31	213/1A1A1	213/1A1A1	213/1A1
32	213/2A1	213/2A1	No resolution passed regarding this survey number
33	213/3A1A	213/3A1A	213/3
34	213/4A1A	213/4A1A	213/4A1
35	213/4A2	213/4A2	No resolution passed regarding this survey number
36	213/4B1A	213/4B1A	213/4B1
37	213/4B1B	213/4B1B	No resolution passed regarding this survey number
38	Not gifted	Not gifted	210/4

In view of the same, the gift deed is a collusive & illegal document.

33. Apart from the above un-condonable deliberate and planned scam, **an extent of 89154.255 Sgm is gifted by the 11th Respondent herein, but the Executive officer had passed an illegal resolution to accept 69773.65 Sgm of lands as roads.** Hence the 11th Respondent is guilty of fraud.

34. It is urged that the resolution dated 06.09.2025 is a self-serving document and proof of connivance between the parties and cannot be a reason to violate CRZ laws and violate the undertaking given to the District Collector by the 11th Respondent on 11.07.2016 in its reply to the show cause notice dated 11.06.2016 and this Gift deed serves as a fresh and continuous cause of action against the conniving violators.

35. The resolution Dated 06.09.25 of the Executive Officer, proposed to obtain roads in unapproved layouts named Bhinaya Beach, Bhavishya Beach and other layouts in S. No. 189/1A1A, 189/3A1A1A,

189/4A1A1A, 189/4B1AA1, 190C/1A1A1A, 194/1A1A1, 195/1A, 195/1B1A, 195/2A1A1, 195/3A1A1A1AA1, 195/4D1A1A1A1A, 196/5A2A1, 196/5A2B1A1A, 210/4, 210/5A1A, 211/1B1A, 211/2A, 211/2C1A1, 211/3A1A1A1, 211/4A1A1A1, 211/5A1, 211/6A, 211/7, 212/1A1A, 212/2A1A, 212/3A1, 213/1A1, 213/3, 213/4A1 and 213/4B1, Contrary to this, the 11th herein made a specific claim before the District Collector that it confines its developments to Survey Numbers 189 (Part), 190 (Part), 191(Part), 192(Part), 194(Part), 195(Part), 196(Part), 211(Part) and not other survey numbers stated in the notice and not belonging to it and any development in the said land is no way connected to it. **Hence it is proven that the 11th Respondent has been developing entire 100 Acres of lands falling in CRZ area since 2015 and it has gifted about 22 Acres as roads under the gift deed, while pleadings before this Hon'ble Tribunal in its counter that it had only purchased 34.49 Acres below 500 Meters and developed the same as eco-friendly farm plots, that too without annexing the alleged layout map of the farm plot project.**

36.The show cause notice dated 11.06.2016 issued by the District Collector is not yet adjudicated and similarly the show cause notice issued by the Executive officer dated 29.10.2015, 04.07.2016 are not adjudicated and the environmental issues beg for full and final adjudication. The continuous coastal erosion and marking of the sand

dunes in the CMZP and the tribunal now deriving knowledge of the same, coupled with failure on part of the authorities to act has left this Hon'ble Tribunal to take action under Section 14 and 15 of the Act for environmental remedy.

37. It is urged that the 15th and the 16th Respondents also filed their objections to the report of the 4th Respondent with typed set of documents on 3rd March 2025. It can be seen from the objections and list of documents that;

- a. A representation dated 03.10.2024 (Page No. 3 to 7 of typed set dated 3rd March 2025) was made before the Authorities, **requesting them to inform the date and time of inspection to allow the Respondents to join for the same and assist you in identifying the Respondents lands and other lands that have been illegally developed and marketed by Manju Foundations, in connivance with its Vendors cum Partner namely Pedro Developers Private Limited and 2 others (R12 to R14 in O.A. No. 13/2024).** However despite best efforts, no opportunity was granted by the Authorities nor our documents with representation was considered.
- b. **Photos of illegal housing layout developments on the lands of R 15 and 16 in S. No. 195/4 and 211/1B1A by an act of land grabbing by Manju Foundations were annexed (Page No. 9 to 11 of typed set dated 3rd March 2025).**
- c. Order of the Hon'ble Regulatory Authority (TNRERA) in C. No. 87/2020 was also filed wherein the Hon'ble Authority in Para 6 has held as follows **(Page 38 to 39 of typed set dated 3rd March 2025);**

"6. The Respondent has further submitted that the Complainant has first to prove his locus standi to file this complaint and until he proves his locus standi to file this complaint against this Respondent, this complaint is liable to be dismissed at threshold. **The Respondent has also stated that they had initially entered into a memorandum of Agreement of Sale dated 22.04.2015 with Metis Pvt. Ltd., Kaleema Pvt. Ltd., Pedro Pvt. Ltd., for**

purchasing an extent of 157.905 ACRES of land from them. As per the said agreement, the Respondent herein had initially purchased an extent of 34.49 acres of land from Metis Pvt. Ltd., Kaleema Pvt. Ltd., Pedro Pvt. Ltd., Metis Pvt. Ltd. vide two Sale Deeds dated 16.10.2015, registered as Doc.No.3603/2015, on the file of SRO, Marakkanam and vide document dated 04.11.2015, registered as Doc.No.3972/2015, on the file of SRO Marakkanam. After purchasing the said 34.49 acres of land, the Respondent had developed the same into 1500 residential Plots under four different categories namely.

1. Barisha Beach **Residential** Plots - 266
2. Bhinaya Beach **Residential** Plots - 228
3. Bhavishya Beach **Residential** Plots - 493
4. Bhavitha Classic **Residential** Plots - 513

7. The Respondent has also submitted that after developing the purchased land into plots, the Respondent has promoted the same and called for prospective purchasers for the said plots. The Respondent has also stated that the patta has also been obtained with respect to the property purchased by them. **Out of 1500 plots developed by the Respondent, they have sold 980 plots to various persons through registered sale deeds.**

Contradicting this admission the Respondent promoter, after annexing the order copy in C. No. 87/2020 with his reply in C. No. 1/2024 before the Regulatory Authority (TNRERA) filed a reply stating that:

(In Page No. 54 typed set dated 3rd March 2025)

5...It may not be out of place here to mention that we have not made any developments nor put up any construction within the CRZ zone. It is pertinent to note that we have not destroyed any Sand Dunes. It is our contention that, we have not made any developments below the 500 mts. coming under the purview of CRZ zone. I submit that, we had only sold the lands as farm lands

without any developments and thus being so, there arise no question of destroying the sand dunes as alleged by the complainant.

(In Page No. 56 of the typed set dated 3rd March 2025)

8... Further we are not developing any projects in Eco Sensitive and No development zone, CRZ zone and the allegation put forth by the complainant is hereby denied as false and baseless. The Respondent also admits that the Complainant are the land owners of the survey numbers as stated above.

From the above exercise, it is clear that the respondent never approaches any forum with clean hands and takes different, contrary and contradictory positions before each forum to somehow manage to obtain a favorable order. Therefore, such a party is not entitled to be heard on merits.

- d. Affidavit of Objections to the report of the 4th and the 11th Respondent had been filed by the Respondents 15 and 16 (Page No. 73 to 76 of the typed set dated 3rd March 2025) and the same may be treated as part of this submission.

38. Coming to the Objections with documents filed by the Applicant to the first report of the Joint committee, it can be seen from the documents contained in the typed set with the objections that;

- a. The illegal developments by the Promoter were covered in the New Indian Express as early as on 01.12.2015 (Page 18-20).
- b. The illegal developments by the Promoter were covered in an Article in ABP Nadu (Page 27-38).
- c. The **sale deed dated 08.04.2022** pertaining to unapproved housing plot No. 99 measuring 1000 sft. In the layout named Bavishya Beach Supreme clearly proves violation by the 11th Respondent (Page 39 to 48).
- d. The **sale deed dated 19.06.2024** pertaining to unapproved housing plot No. 114 **measuring 1000 sft.** In the layout named Bavitha

Beach Classic clearly proves violation by the 11th Respondent (Page 58 to 72).

- e. **The representation dated 24.09.2024 (Page No. 82 to 89) with enclosures submitted to the Joint Committee by SPAD further prove the silence of the authorities and the brazen violation by the Promoter. The documents proving violations filed are;**

39. **Google/ Satellite Images with Photographs** & Latitude and Longitudinal details and description of the impugned site & each violation (Page No. 190 to 252)

- a. Development of illegal layout developments,
- b. Construction of unauthorised model house in approved portions,
- c. Installation of EB poles with Street Lights towards sea shore and
- d. flattening of sand dunes and
- e. tampering with sea shore Poramboke lands & erection of fencing stones in the impugned site.

40. **G.O.M.S. NO. 146**, establishing the subject site as Turtle Nesting Zone, thereby falling in **CRZ-IA and CRZ-III**, No Development Zone. (Page No.140 to 143)

41. **Guideline Value** of lands in S. No's. 189, 195, 194, 196, 210, 211, 212, 213 of Marakkanam North Village, to establish promotion of residential plots by fixation of guideline values in the impugned site. (Page No. 144 to 189)

42. **Photographs** with Latitude and Longitudinal details of illegal developments in the residential layouts named **BARUNA BEACH AND BARSHANS BEACH AT KHEEZE PETTAI VILLAGE** promoted by the 11th Respondent. (Page No. 99 to 138).

Unfortunately, the entire representation with the enclosures were never considered by the Joint Committee while preparing its report and the developer has used the opportunity to drag the proceedings and sell all the

unapproved plots and create a gift deed citing requirement of the road for the illegal plot purchasers.

43. In view of the specific direction of this Hon'ble Tribunal **dated.....**, referred above, upon knowledge, the applicant in its representation has also provided details, photographs and evidences of illegal layout in Kilpettai Village, Marakkanam Taluk by the 11th Respondent, but neither the same was revealed before this Tribunal nor any action taken on the same by the Authorities till date.

44. Now, coming to the second report of the committee dated 05.12.2025, it is urged that the subject report does not deal with the entire extent of 180 Acres but speaks only about 52.94 Acres (In page 8) of lands lying beyond 500 meters of HTL which have been approved by DTCP and also speaks about 34.49 Acres (In Page 5) developed with 500 meters of HTL. Thus, out of the extent of 180 Acres only 87.43 Acres have been inspected even as per the report.

45. This report specifically states that sand dunes are available beyond 700 meters of the HTL, it is not clear how sand dunes/ coastal dunes will form beyond 700 meters but not within, possibly an act of god to facilitate the project or perhaps this physical feature read with the TN 95 map would prove destruction of sand dunes by the promoter to form the illegal coastal layout.

46. The Respondents 15 and 16 herein have also admitted in the counter, the existence and destruction of sand dunes by the builder

and the respondent builder himself had not specifically denied the presence of sand dunes and the destruction of sand dunes by it. Viewed from this angle, when the inspection of the site is made after destruction of sand dunes, they are not going to be found in the site, but are only going to be found in the neighboring sites which remain undeveloped and un-tinkered.

47. The finding in Page 6, Para 9 of the report refers to two lane (60 feet) tar road formed as part of the main access road to the 40 Acre unapproved housing layout named Bhinaya Beach (below 500 m). However, the two lane/ 60 feet tar road is not formed over lands in S. No. 195/4D but rather on lands in S. No. 192, 194/1, 174/2, 10, 11, 12, 13, 14, 195/4a, 195/1, 211/2a, 211/6.

Further, contrary to the finding there are two 60 feet/ two lane tar road both connecting ECR road to sea, this has not been revealed in the report.

48. The report is silent about housing layout formed in S. No. 195/4a, 195/4b, 211/1b1a and 211/1a and 211/5 and details of its ownership which vests with the Respondents herein.

49. This report is also silent about the number of unapproved housing plots (measuring 600 to 3000 sft), the number of unapproved vacant plots (measuring 20 cents and above), their maps and the linear measurements of the plots and a detailed map showing access to each of these unapproved projects from the approved layouts.

50. Contrary to the report, there are no two-way/ 60 feet road providing access from Ecr road to sea in lands in S. No. 189/4a, 189/1a, 190/1a, 195/2, 195/4d, 211/2c, 211/3, 212/ 1,2. However these survey numbers bear housing plots and unapproved vacant plots with 30 feet and 40 feet tar road and motorable newly formed roads.

A map showing the annexation of approved, unapproved housing plot and unapproved vacant plot project has not been filed superimposing the layout maps with the cadastral maps with CRZ classification thus the report is totally an act of dilution of the violations by the builder.

51. For reasons not known, there is no finding pertaining to the classification of the impugned lands as CRZ-III and there is no report on the land use of the impugned site.

52. In Page 9, the report deals with R.S. No. 192 (Communal Poramboke land). Also, the finding in Para a, page 9 that inter alia, Manju foundations purchased lands in S. No. 192 is incorrect, rather it only converted part of this government land into 60 feet two-way road by an act of encroachment, this road was removed by the government pursuant to an order of the Hon'ble Madras High Court in WP No. 20713/2013 but the government land has been re-encroached and the respondent promoter started marketing the same as access road having layout access from Ecr road to sea, this resulted in filing of the injunction petition (IA 104/24) by us, before this Hon'ble Tribunal and no counter has been preferred in the same.

53. **Admittedly there are no buildings in land in S. No. 192(Part), but the existence and formation of 60 feet tar road has not been**

revealed for reasons not known, the development in the land in S. No. 192(Part) has been accepted by the promoter itself in its reply dated 11.07.2016 to the show cause notice dated 11.06.2016 issued by the District Collector. Hence there cannot be a claim contrary to it.

54. It can be seen from the map annexed to the gift deed that the unapproved projects annex with each other but the annexation of these lands with the approved layouts is not revealed neither in the report of the committee nor by the promoter in its report.

55. It is specifically averred that about 100 acres that have been developed fall below 500 m of the HTL, but these facts are not reported. **It can be seen that the approved plot project annexes with the unapproved plot project and the unapproved hosing layout project, therefore the entire 180 odd acre project constitutes a single land bank.**

56. The sole report filed by the respondent promoter pursuant to the order of this tribunal is also incomplete and does not reveal details of 180 Acres of land which it has promoted and sold and for which it also has sale deeds as stated below;

**TOTAL 150 ACRES ALREADY PURCHASED BY THE 11TH
RESPONDENT OUT OF THE 180 ACRES DEVELOPED**

<u>S. No.</u>	<u>Document Number</u>	<u>Executant</u>	<u>Claimant</u>	<u>SURVEY NO</u>	<u>EXTENT</u>
1	3061/2019 12/12/2019	1) Pedro Developers Ltd 2) Metis Developers Pvt Ltd	Manju Foundations (P) Ltd	188/1A 188/1B 188/2 188/3 189/2	22.0 CT 6.28 CT 3.49 CT 1.19 CT 33.0 CT

		3) Kaleena Developers Pvt Ltd			Total 11.51 Acres
2	1091/2023 20/03/2023	1)Pedro Developers Ltd 2) Kaleena Developers Pvt Ltd 3)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	189/1B 189/2A 190/1B3 190/2 190/3	18.0 CT 88.0 CT 94.0 CT 73.0 CT 2.46 CT Total 5.19 Acres
3	1092/2023 20/03/2023	1)Pedro Developers Ltd 2)Metis Developers Pvt Ltd 3) Kaleena Developers Pvt Ltd	Manju Foundations (P) Ltd.	212/3	2 ACRE Total 2.00 Acres
4	1392/2023 20/03/2023	1)Pedro Developers Ltd 2)Metis Developers Pvt Ltd 3) Kaleena Developers Pvt Ltd	Manju Foundations (P) Ltd.	189/1A1	2.20 ACRE
5	1880/2023 15/05/2023	1) Kaleena Developers Pvt Ltd 2)Metis Developers Pvt Ltd	Lakshmi PR Doc: 1612 / 2012 773 / 2012 774 / 2012	213/1	30.0 Cents
6	1882/2023	Pedro Developers Ltd	Anto Prabhu G	213/4B	22.0 Cents
7	1884/2023	1)Pedro Developers Ltd 2) Kaleena Developers P Ltd 3)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	212/3, 213/4B	22.0 Cents

8	1885/2023	1)Kaleena Developers Pvt Ltd 2)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	213/1	26.0 Cents
9	2514/2023	1)Pedro Developers Ltd 2) Kaleena Developers P ltd 3)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	212/3, 213/4A, 213/4B	6 Acre
10	2515/2023	1)Pedro Developers Ltd 2) Kaleena Developers P ltd 3)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	191/1A1, 193/1A	4 Acre
11	2692/2023	1)Pedro Developers Ltd 2) Kaleena Developers P ltd 3)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	190/1A1A1 A1A	1 Ac 81.0 Cents
12	3686/2023	1)Pedro Developers Ltd 2) Kaleena Developers P ltd 3)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	190/1B3	10.0 CT
13	2198/2024	1)Pedro Developers Ltd 2) Kaleena Developers P ltd 3)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	193/1A1, 193/1B, 193/2	3 AC 54 CT
				194/2	37.0 CT Total 3.91 Acres

14	2199/2024	Pedro Developers Ltd	Manju Foundations (P) Ltd.	174/10, 174/11, 174/12, 174/13, 174/14, 174/21, 174/8, 174/9	1.86 Acres
15	2200/2024	1)Pedro Developers Ltd 2) Kaleena Developers P Ltd 3)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	189/3B, 189/4B2	3 AC 22 CT
				195/4B	22.0 CT
				211/2A, 211/2B	1AC 86.5 CT 5.30 acres
16	2201/2024	1)Pedro Developers Ltd 2) Kaleena Developers P Ltd	Manju Foundations (P) Ltd.	196/3 196/5A1 196/5A2A	86.5 CT 51.0 CT 65.0 CT 202.5 Cents
17	2202/2024	1)Pedro Developers Ltd 2) Kaleena Developers P Ltd 3)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	195/1A 196/5A2A 211/7 213/1A1 213/2 213/3 213/4A1 213/4B1A	15.0 CT 1.46 AC 2.38 AC 2.26 AC 1.26 AC 2.51 AC 1.44 AC 4.69 AC 16.15 Acres
18	2203/2024 22/05/2024	1)Pedro Developers Ltd 2) Kaleena Developers P Ltd 3)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	189/1A1A, 189/3A, 189/4B1AA 1	5.20 AC
				195/1B1A1	1.30 AC
				195/3A1A1 A1AA1	57.0 CT
				195/4D1A1 A1A1A	5.0 CT
				196/5A2B1 A1A	3.68 AC
				211/2C1A1	17.0 CT

				211/3A1A1 A1	12.0 CT
				211/4A1A1 A1	63.5 CT
				211/5A1	33.5 CT
				211/6A	2.23 AC
				212/1A1A, 2A1A, 3A1	19.28 AC
					TOTAL 33.57 ACRES
19	2204/2024	1)Pedro Developers Ltd 2) Kaleena Developers P Ltd 3)Metis Developers Pvt Ltd	Manju Foundations (P) Ltd.	190/1A1A1 A1A1, 190/21	3.99 AC
				194/1A1A1 A	8.58 AC
					12.57 ACRES
20	518/2026	1)Pedro Developers Ltd 2) Kaleena Developers P Ltd	Manju Foundations (P) Ltd.	210/5A1A	16.5 CT
				210/4A, 210/5A1A	13.5 CT
				211/1A	57.0 CT
					Total 87 Cents
21	3060/2019	1)Pedro Developers Ltd 2)Metis Developers Pvt Ltd 3)Kaleena Developers P Ltd	Manju Foundations (P) Ltd. Pvt Ltd	180/9	54.0 CT
				180/10	43.0 CT
				180/11	40.0 CT
				180/14	22.0 CT
				181/5B1	16.0 CT
				181/4B2A & 181/4B2B	41.0 CT
				181/2,3,4 181/7A2	31.0 CT 17.0
					2.64 AC
22	3972/2015	Kaleena Developers Pvt Ltd	Manju Foundations (P) Ltd. pvt ltd	189/3A Old no: 113	0.03 CT
				189/4A Old No: 114	0.28 CT

				189/4B1 Old No.114	1.13 CT
				189/1A Old no: 112/1	0.30 CT
				190/1A Old No: 116/1, 2, 121	3.96 CT
				211/5 Old No : 99/5	1.22 CT
				194/1 Old No: 122/1, 2 , 123	1.26 CT
				195/1 Old no: 115/1	0.29 CT
				195/2 Old No. 115/4	0.81 CT
				211/2 C Old No. 99/3, 9	0.99 CT
				211/3 Old No. 99/4	2.21 CT
				211/4 Old No. 99/6	2.72 CT
				211/6 Old No. 99/2 & 8	0.11 CT
				212/1 Old No. 100/1, 2	1.65 CT
				212/2 Old No. 100/1, 2	1.68 CT
					22.05 Acres
23	3603/2015	1)Kaleena Developers Pvt Ltd & another	Manju Foundations (P) Ltd. Pvt Ltd	195/1 Old No. 118/1	1.28 CT
				210/4 Old No. 98/3	0.11 CT

				210/5 Old No. 98/8	0.46 CT
				194/1 Old No. 122/1,2 123	0.47 CT
				195/3 Old No. 115/2	1.94 CT
				211/1B Old No: 99/1	1.58 CT
				211/6 Old No. 99/2	0.03 CT
				196/5A2B Old No.125/3,4 ,5,6	6.57 CT 12.44 Acres

57. Moving forward, the Notice dated 11.01.2016 issued by the Executive Officer, Marakkanam (Page No. 22 of the Typed set of R15 and R16). The Notice dated 11.01.2016 issued by the Executive Officer, Marakkanam (Page No. 22 of the Typed set of R15 and R16) prove cognizance taken by the authority to the illegal layouts, hence to contradict himself into cresting a gift deed amounts to blowing hot and cold and playing into the hands of the promoter.

58. The Writ Petition No. 20713/2016 and compliance report therein (Page No. 32 – 36 of the Typed set of R15 and R16) filed by the District Collector clearly proves that the lands in S. No. 192 (Part) which is a communal Poramboke was encroached upon by the Respondent promoter for the purpose of forming a 60 feet tar road.

With the very same intention, the lands of the Respondents in S. No. 195/4A and 195/4B and 211/1B1A were encroached upon to form housing plots and layout roads in the year 2015 by the Respondent Promoter and now pending disposal of this application the lands in S. No. S. No. 195/4A and 211/1B1A were gifted as a part of the gift deed, without regard to the rights of the Respondents herein.

In this context, it is prayed that the layout framework of the layouts named "Bhinaya Beach and others" suffer from lack of contiguous access and are promoted by an act of land grabbing or private and government lands.

59. Further, it can be seen from Page 81 of the typed set of the Applicant that the Department of Environment, issued a letter dated 20.02.2023 in Letter No. T1/1046/2021 based on the representation of one Mr. 1. R. Sarvesh Kumar dated 04.05.2021, 2. Representation from one M/s. Arihant Farm Developers dated 20.02.2023, 3. Representation from S. Sivadas dated 27.01.2023 instructed the Forest range officer to inspect the area to check if there was any violation of CRZ, 2011 and submit a report before 27.02.2023, in compliance with the same, Mr. Saravanan, Range officer, attached to the Department of Environment and Climate Change submitted his inspection report dated 24.02.2023 with photographs clearly stating that he inspected the site with the Village Administration Officer on 22.02.2023 and **upon joint inspection it was identified that within 30 meters electrical connection, pipes were installed for drinking water in the CRZ area. Buildings are also constructed without**

permission and CRZ clearance. It is also seen that the residential houses are being suit next to the sand dune in this area.

60. **The 6th Photograph therein concerning the EB Building shows that in S. No. 212- CRZ-1A construction is made without CRZ clearance and the photo of existing sand dunes are seen in Page No. 86 and Photo in Page 87 which is the TN 95 map, clearly shows that the lands lie in CRZ-1A and CRZ-III No development Zone** and despite the letter dated 16.03.2023 in R.C. No.P1/1046/2021 Dated 15.03.2023 issued by the Member Secretary TNSCZMA to the District Collector, Villupuram and the District Environmental Engineer, TNPCB, Villupuram, no action had been taken.

The findings in this report has not been controverted by the other contesting Respondents.

61. In his letter dated 29.08.2023 in Lr. No.3230/DEE/TNPCB/VPM/Complaint/2023, relying on the above inspection report dated 22.02.2023 by the forest range officer attached to the Department of Environment & the Complaint petition dated 07.02.2023 has stated as below in his proceedings; (Page 68 of the Applicant's typed set);

...the site was inspected by the officials of Department of Environment, Chennai on 22.02.2023 and noticed that the building is being constructed in the said area and also drinking water pipeline and power supply arrangement done around 30 meters distance from the HTL without obtaining CRZ clearance.

"Based on that the said site was inspected by the officials of Department of Environment, Chennai on 16.05.2023 along with the TNPCB officials and noticed that during inspection **three residential buildings were constructed in the said location within their fencing and adjacently another plots were developed by Thar Road, Street Light, Electric Power Control Room towards seaside within CRZ 1A, also building**

has constructed beyond CRZ 1A and sand dune found at a distance of 800 m from the HTL in southern Manju Foundation Pvt. Ltd.

Again, the said site was inspected by the officials TNPCB officials on 19.07.2023 and observed that noticed that 7 residences have been constructed & 1 residence under construction and the remaining vacant 231 plots in DTCP approved 12.269 Acres located 500 meters away from the HTL. However, sand dune (Ecologically sensitive area) was found adjacent to the DTCP approved plots (Manju Foundation) in Northern direction.

Adjacent to the DTCP approved plots, additional plots had been developed by laying Thar Road, 13 Electrical poles towards seaside which falls within CRZ 1A and CRZ III (NDZ).

...The Chairman of DCZMA committee members has decided to obtain from the project proponent showing the CRZ mapping of LTL, HTL, super imposing the proposed site and other salient features such as land use location of sand dunes with reference to the site from the Institute of Remote Sensing, Anna University, Chennai.

In this regard, letter was addressed to the project proponent to furnish the CRZ mapping of LTL, HTL, super imposing the lay out site and other salient features such as land use location of sand dunes with reference to the site obtained from the Institute of Remote Sensing, Anna University, Chennai vide Letter No. RC. No. F. DCZMA/CRZ/COMPLAINT/VPM/2023, dated 07.07.2023. **At present the project proponent has not furnished above said details so far.**

And subsequently rather than taking effective action, the authorities preferred to dilute the matter and kept all proceedings against the developer in abeyance, which amounts to continuous dereliction of duty & negligence.

Further when the sand dunes are recorded in the inspection report dated 22.02.2023 of the forest range officer, the absence of the same in the subsequent inspections, read with the specific findings of presence of sand dunes in northern and southern side of the

lands held by Manju Foundations prima facie establishes the destruction of sand dunes.

62. The Photos attached to the Page Numbers 89 to 92 of the Applicants typed set clearly prove coastal Erosion in the neighboring land which is obviously due to the levelling and destruction of sand dunes in the impugned 180 Acre site. And page number 93, 94 is the copy of the TN 95 map, clearly shows that the lands lie in CRZ-1A and CRZ-III No development Zone, hence the developments are totally contrary to law.

63. It is pertinent to note that the 11th Respondent has not filed its layout sketch of Bhinaya Beach & others, however the same has been uploaded by the 15th and the 16th Respondent in its typeset (Page No. 109), from which it is derived that;

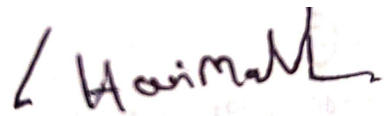
- a. S. No. 210/5A entire extent is developed as a layout (Part ownership alone with the 11th Respondent).
- b. S. No. 211/1A entire extent is developed as a layout (Part ownership alone with the 11th Respondent).
- c. S. No. 211/1B1A entire extent is developed as a layout (Part ownership alone with the 11th Respondent).
- d. S. No. 195/4B entire extent is developed as a layout (land belongs to the Respondent 15 and 16).
- e. S. No. 211/2A entire extent is developed as a layout.
- f. S. No. 195/3a1a1aa1 entire extent is developed as a layout.
- g. S. No. 195/1B1A entire extent is developed as a layout.
- h. S. No. 194/1a1a1a(Pt.) 60 feet layout road is formed and annexed as part of the layout.
- i. Government land in S. No. 194/2(Pt.) 60 feet layout road is formed and annexed as part of the layout.

- j.** S. No. 174/9, 10, 11, 12, 13, 14 60 feet layout road is formed and annexed as part of the layout.
- k.** Government lands in S. No. 174/2(Pt.) and 192(Pt.) 60 feet layout road is formed and annexed as part of the layout.

The layouts are being promoted from 2015, hence, the Ownership documents with Revenue records since 2015 for the same have not been produced by the 11th Respondent as they stand in the names of its Vendor cum associates, government and third parties.

Also, without the (a) to (k) the lands would not be contiguous and 60 feet layout approach road from ECR road to sea shore cannot be formed. These facts have not been revealed by the parties who have come to this Hon'ble Tribunal with soiled hands and at the outset, do not deserve to be heard on merits.

64. In view of the above, this Hon'ble Tribunal shall record the admissions and the evidences filed by the Respondents herein and consider the matter on merits and pass orders in the interest of Environment and thus render Justice.



COUNSEL FOR THE RESPONDENTS 15 AND 16

**BEFORE THE NATIONAL GREEN TRIBUNAL(SZ),
SITTING AT CHENNAI**

(Under Section 18(1) r/w S. 14 & 15
of National Green Tribunal Act, 2010)

Original Application No. 013 of 2024 (SZ)

Between:
S. Sivadas
Son of SivaKumar Kulasekar,

... APPLICANT

- AND -

1.The Ministry of Environment,
Forest and Climate Change
And 15 others

...RESPONDENTS

***WRITTEN SUBMISSIONS FILED
ON BEHALF OF THE 15TH AND THE
16TH RESPONDENTS***

R. Ashwanth,
M Ananda Kumar
Hari Mahesh
Advocates
98407 00341

COUNSEL FOR THE
RESPONDENTS 15 AND 16