

BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE
BENCH, AT CHENNAI
ORIGINAL APPLICATION NO. 133 OF 2025

MEENAVA THANTHAI K.R. SELVARAJ KUMAR
MEENAVAR NALA SANGAM,

Represented by its President,
M.R. Thiyagarajan,
S/o Late C. Rajalingam,
Office at No. 48, East Madha Church Street,
Royapuram, Chennai 600 013

...Applicant

Vs

1. Union of India

Through the Secretary,
Ministry of Environment, Forest and Climate Change,
Indira Paryavaran Bhavan, Ali Ganj,
Jorbagh Road, New Delhi 110003

2. Tamil Nadu Coastal Zone Management Authority (TNCZMA)

Through the member secretary,
Department of Environment,
Panagal building, Saidapet,
Chennai 600 015

3. The District Collector,

Collectorate, GST Road,
Chengalpattu 603001

4. Tamil Nadu Pollution Control Board

Through the Chairman,
76, Mount Salai,
Guindy, Chennai 600 032

5. Alampara Hotels and Resorts Private Limited,

Through the Authorized Signatory
94, Kottaikadu Village,
Edaikazhinadu Panchayat,
Chengalpattu District,
Tamil Nadu 603304

...Respondents

For ALAMPARA HOTELS AND RESORTS PVT LTD



Director

COUNTER AFFIDAVIT FILED ON BEHALF OF THE 5TH RESPONDENT

I, J. Govindarajan, S/o Late Mr. K. Jagannadhan, aged about 64 years, Authorized Representative of Alampara Hotels and Resorts Private Limited having office at 94, Kottaikadu Village, Edaikazhinadu Panchayat, Chengalpattu District, Tamil Nadu- 603304 do hereby solemnly affirm and sincerely state as follows:

1. I am the authorized signatory of the 5th Respondent, and I am well acquainted with the facts and circumstances of this case. I am duly authorized and competent to swear this affidavit for and on behalf of the 5th Respondent.
2. At the outset, it is humbly submitted that this application is motivated and filed for collateral purposes.
3. It is submitted that there lies no instance of violation of any of the provisions of the CRZ Notification, 2011 or that of the Environment Protection Act, 1986 or any other law at the time being in force.

BRIEF FACTS

4. The 5th Respondent is a private company registered in the year 2005, having purchased the pertinent property between 2007-2012, admeasuring 45 acres, near the backwaters of Marakkanam on the East Coast Road, between Mahabalipuram and Pondicherry and around 108km from Chennai, having its address at No. 94, Kottaikadu Village, Cheyyur Taluk, Edaikazhinadu Panchayat, Chengalpattu District, Tamil Nadu- 603 304.
5. It is submitted that the said land was originally a prawn hatchery since mid-1980s, wherein the entire ground water in the huge prawn pits that had been dug out was polluted due to the constant pumping of salt water and prawn feed by the hatchery.

For ALAMPARA HOTELS AND RESORTS PVT LTD

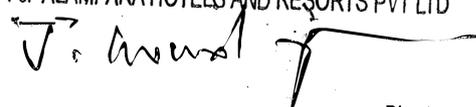


Director

6. It is submitted that it is the 5th Respondent herein who purchased the land with the objective of developing a world class water sports linked eco-resort. The 5th Respondent took efforts to first restore the damage done by the prawn hatchery. By merely stopping further damage, the ground water, soil and environment started restoring itself. Over time, the said pits filled with rainwater attracting a large variety of birds. The 5th Respondent has thus substantially contributed to the restoration of biodiversity on land that had earlier been severely degraded by being used as a prawn hatchery.
7. The promoter-director of the 5th Respondent, Mr. Arun Vasu— President of the Surfing Federation of India and founder of Surf Turf, Covelong— has long been dedicated to the promotion of water sports in Chennai. Surf Turf, Covelong has played a pivotal role in identifying and training local talent for international competitions, including hosting annual international water-sports events. The 5th Respondent company was incorporated with the very intention to provide a safe, sustainable, and high-quality water-sports and camping experience, integrating international collaboration providing state-of-the-art facilities.
8. The 5th Respondent's efforts have been consistently recognized by the Sports Development Authority of Tamil Nadu as well, including a formal appreciation vide letter dated 02.09.2025 while recognizing the 5th Respondent resort as a training hub for athletes preparing for the Asian Games 2026. In addition to ecological restoration, the 5th Respondent has undertaken community-oriented initiatives such as waste-segregation awareness, plastic recycling, local employment, and training of the village youth in water sports, with a focus on education and long-term upliftment.

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For ALAMPARA HOTELS AND RESORTS PVT LTD



Director

9. Despite obtaining all requisite approvals, the 5th Respondent has been subjected to persistent obstruction by certain vested individuals, and the present proceedings are nothing but an attempt to harass the 5th Respondent for extraneous reasons.
10. In furtherance of such individuals with vested interests, it is submitted that the 2nd Respondent herein had issued a show cause notice dated 17.02.2025 to which a detailed reply had been sent dated 17.03.2025. Thereafter, a non-speaking order was passed dated 25.08.2025, contrary to both law and facts, on the file of the 2nd Respondent in Proc. No. P1/113/2024, which has been challenged separately vide Appeal No. 57 of 2025 that is pending disposal before this Hon'ble Tribunal.
11. Thus, in light of the above, the present Application is unsustainable and infructuous.

PARA WISE REPLY

12. I submit that with regards to paragraphs 1 and 2 of the Application, the same is denied as baseless. There is no unauthorized establishment or operation of a resort that is being run by the 5th Respondent. In fact, the 5th Respondent has gone above and beyond to obtain Camping Operator Certificate dated 31.08.2023, permission to conduct water sport activity from Sports Development Authority of Tamil Nadu vide communication dated 20.12.2024 and a building plan approval for the renovation of the already existing super structure vide letter dated 07.12.2024 on the file of the Directorate of Town Panchayat. Moreover, a Survey was obtained from the Institute of Remote Sensing as early as in 2012 and the 5th Respondent is thus not in violation of any of the provisions of the CRZ Notification.
13. I submit that with regards to paragraphs 3 and 4, the same is denied as baseless and irrelevant. The 5th Respondent had ensured that they follow the provisions of the law at the time being in force and hence the provisions of the CRZ Notification have been followed scrupulously.

For ALAMPARA HOTELS AND RESORTS PVT LTD


Director

14. With regards to the averments made out in paragraph 5, the same is denied as baseless. The 5th Respondent has begun its operations only after obtaining Consent to Establish in 2013.
15. With regards to the averments made out in paragraphs 6 to 14, the same is denied as irrelevant. The 5th Respondent once again reiterates that they have obtained all the necessary clearances prior to the commencement of their activities. Notwithstanding the same, as stated above, in light of the order dated 25.08.2025 on the file of the 2nd Respondent in Proc. No. P1/113/2024, the said Application is infructuous and hence not maintainable.
16. With regards to the averments made out in paragraphs 15 to 18, the same is once again denied as baseless. The 5th Respondent reiterates that they are not releasing any untreated effluents into the waters around the CRZ area.
17. With regards to the averments made out in paragraph 19 containing grounds for this application, the same is denied as baseless. The 5th Respondent had not violated any provision of law at the time being in force and hence, the present application is not maintainable. At any rate, in light of the order dated 25/08/2025 on the file of the 2nd Respondent in Proc. No. P1/113/2024, the said Application is infructuous.

For the reasons stated above it is humbly prayed that this Hon'ble Court may be pleased to dismiss the present Application with costs and thus render justice.

Solemnly affirmed at Chennai
On this the 17th Day of March 2026
And signed in my presence

For ALAMPARA HOTELS AND RESORTS PVT LTD


Director

BEFORE ME
MS/410/2021
383, New Addl. (Law Chambers, Madhav High
Court - 106
ADVOCATE: CHENNAI

**NATIONAL GREEN TRIBUNAL,
SOUTHERN ZONE, CHENNAI**

O.A. No. 133 of 2025

**Meena Thanthai K.R. Selvaraj Kumar
Meenavar Nala Sangam**

.... Applicant

Vs

Union of India & 4 Ors.

... Respondents

**COUNTER AFFIDAVIT FILED BY THE 5TH
RESPONDENT**

M/s.

S.R. Raghunathan (MS/698/1997)

K.V. Kartik Subramanian (MS/2206/2019)

COUNSEL FOR THE 5TH RESPONDENT

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