

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE**

**O.A.No. 188 of 2024**

Muhammad Risham

.... Applicant

Versus

District Collector, Kozhikode  
& 5 Ors

.... Respondents

**COUNTER AFFIDAVIT FILED ON BEHALF OF THE 5<sup>th</sup> RESPONDENT  
ALONG WITH ANNEXURES.**

**M/s. KING & PARTRIDGE**

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


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Counsel for the 5<sup>th</sup> Respondent

**Reliance BP Mobility Limited**

  
Authorised Signatory

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

**Original Application No.188 of 2024 (SZ)**

Muhammad Risham,  
House No.12/163, Nambyattil House,  
Naduvannur Post, Kozhikode,  
Kerala- 673 614

...Applicant

VS

1. District Collector,  
Kozhikode Collectorate, Civil Station P.O.,  
Kozhikode - 673 020  
Phone: 0495 2371400  
Email: dckzk.ker@nic.in
2. The Chairman,  
Central Pollution Control Board,  
Parivesh Bhawan, East Arjun Nagar,  
Delhi - 110 032  
Email: ccb.cpcb@nic.in  
Phone: +91-11-43102030
3. The Member Secretary,  
Kerala State Pollution Control Board,  
Pattom P.O., Thiruvananthapuram - 695 004  
Phone: [Phone number]  
Email: [Email]
4. Joint Chief Controller of Explosives,  
Petroleum & Explosives Safety Organization (PESO),  
South Circle, A and D-Wing, Block 1-8, Second Floor,  
Shastri Bhavan, 26 Haddows Road,  
Nungambakkam, Chennai - 600 006  
Email: jtcechennai@explosives.gov.in  
Phone: (044) 28281023
5. Reliance BP Mobility Limited,  
Indian Oil Bhavan,  
8/1079, Avinashi Road,  
Coimbatore - 641 018  
Email: [Unknown]  
Phone: +91 9585958578
6. Shekeen Imbichi Moidy,  
Padikkal House,  
Naduvannur, Koyilandy Taluk,  
Kozhikode District - 673 305  
Email: [Unknown]  
Phone: [Unknown]

...Respondents

**Reliance BP Mobility Limited**

Authorised Signatory

**COUNTER AFFIDAVIT FILED BY THE 5<sup>TH</sup> RESPONDENT**

I, Dileep Kodoth, State Business Development Manager - Kerala, in the abovenamed 5<sup>th</sup> Respondent, Reliance BP Mobility Limited having office at I Floor, Chandrika Chambers, S.A. Road, Vytilla Junction, Cochin - 682 019, having come down to Chennai, do hereby solemnly affirm, and state as follows:

- 1) The 5<sup>th</sup> Respondent, Reliance BP Mobility Ltd ("RBML") is an authorized Oil Marketing Company ("OMC") for retail sale of transportation fuels in India. The Respondent carries out its businesses under the brand name "jio-bp" and offers Indian consumers a full slate of transportation fuels and mobility solutions with market-leading consumer benefits alongside a spectrum of ancillary services. The 5<sup>th</sup> Respondent company adheres to stringent safety, environmental, and operational standards, aligning with national regulations and international best practices. As an OMC, RBML holds a robust track record of compliance with statutory requirements related to the establishment and operation of fuel retail outlets. This commitment is evident through its meticulous adherence to all applicable regulations and guidelines issued by authorities including the Central Pollution Control Board, Petroleum and Explosives Safety Organization etc.
  
- 2) The 5<sup>th</sup> Respondent respectfully submits this counter affidavit in response to the Original Application ("Application") of the Applicant. The 5<sup>th</sup> Respondent denies all and sundry the contentions, averments, statements, submissions and allegations made by the Applicant in the Application, which are inconsistent with and/ or contrary to all that is set out hereinbelow. The 5<sup>th</sup> Respondent states that nothing stated in the Application is admitted, nor should be deemed to have been admitted by or on behalf of the 5<sup>th</sup> Respondent for want of specific non-traverse, or otherwise. The 5<sup>th</sup> Respondent craves leave to file an additional affidavit, if and when necessary.

- 3) It is respectfully submitted that the address mentioned for the 5th Respondent, Reliance BP Mobility Limited, in the cause title as "Indian Oil Bhavan, 8/1079, Avinashi Road, Coimbatore - 641 018" is incorrect and does not pertain to Reliance BP Mobility Limited. Consequently, the notice served at this address is not properly directed to the 5th Respondent. The correct address of the 5<sup>th</sup> Respondent is as below:

Reliance BP Mobility Limited  
I Floor, Chandrika Chambers,  
S.A. Road, Vytilla Junction,  
Cochin – 682 019.

- 4) At the outset, the present Application under Section 18(1) r/w Sections 14 & 15 of the National Green Tribunal Act, 2010 ("Act") is not maintainable in law and the same is liable to be dismissed in limini. This 5<sup>th</sup> Respondent denies the allegations and averments contained in the Application filed by the Applicant. It is submitted that the grievances raised by the Applicant are unfounded, lack substantive merit, thoroughly misconceived in as much as the Applicant has no locus standi to complain against the legitimate and proper exercise of power in granting permissions by the statutory authorities concerned. The Applicant has not demonstrated any tangible injury or infringement of legally protected rights, which renders the present Application unsustainable and necessitates outright dismissal of this Application.
- 5) The material and pertinent facts germane to the present case are set out by this 5<sup>th</sup> Respondent. On 07.05.2021, the 5<sup>th</sup> Respondent, issued a Letter of Intent ("LOI") to the 6<sup>th</sup> Respondent proposing to set up a petroleum Retail Outlet ("RO) at the site measuring 1422.32 sq. m. comprised in land bearing Survey No.198/4, located in Naduvannur Village, Koyilandy Taluk, Kozhikode District, within the State of Kerala ("Site"). **(ANNEXURE – I)**. This step initiated the formal process of establishing the retail outlet in line with the regulatory requirements applicable.

- 6) Subsequently, on 07.07.2021, the 5<sup>th</sup> Respondent submitted an application for the District Magistrate's No Objection Certificate ("DMNOC") under Rule 144 of the Petroleum Rules, 2002 under the Petroleum Act, 1934. **(Annexure II)** It is pertinent to note that the Applicant has raised objections even then before the District Magistrate against setting up a RO at the Site. Further to the same, the District Magistrate investigated the issue through the Tahsildar, Koyilandy, Regional Fire Officer, Fire & Rescue, District Superintendent of Police, Kozhikode Rural and Executive Engineer, Roads Division, Public Works Department. After having the issue thoroughly scrutinized, all the officials have cleared the Site with respect to each of their subject matter and gave their no-objection report to the District Magistrate. The District Magistrate based on the clearance from all the officers concerned, have granted the final DMNOC for establishing the proposed RO vide his proceedings dated 01.12.2023. **(ANNEXURE - III)** In addition, the District Magistrate in his proceedings has recorded that PESO has issued initial approval permitting construction of the proposed RO.
- 7) Subsequent to an application made by 5<sup>th</sup> Respondent by 09.08.2021, Petroleum & Explosives Safety Organization ("PESO") granted the initial approval for construction of the proposed RO to the 5<sup>th</sup> Respondent on 12.08.2021 **(ANNEXURE - IV)**. Later, based on a complaint from the Applicant, the Jt. Chief Controller of Explosives, South Circle, Chennai by his letter dated 18.07.2023 **(ANNEXURE V)**, sought an explanation from the 5<sup>th</sup> Respondent as to why the initial approval granted by PESO shall not be withdrawn. By reply letter dated 20.07.2022 (wrongly mentioned as 2022 instead of 2023) the 5<sup>th</sup> Respondent provided its explanation on the issue raised by the Applicant substantiating with relevant documents **(ANNEXURE - VI)**. PESO after having found the explanation of the 5<sup>th</sup> Respondent satisfactory and appropriate, dismissed and closed the complaint made by the Applicant. This by itself is a conclusive affirmation that there is no deviation and the Site including the layout drawing for the proposed RO is compliant with extant norms.

- 8) Since the Applicant made an objection to the DM, while the processing of application of the 5<sup>th</sup> Respondent for DMNOC was underway, the 6<sup>th</sup> Respondent made a query to the Local Self Government Department, Kerala seeking to know the type/classification/designation of the area in Naduvannur Village where the Site on which RO is proposed to be established. In reply to the query made by the 6<sup>th</sup> Respondent, by letter dated 22.06.2023, the department categorically responded confirming that there are no approved master plan or detailed town planning programs made for the Naduvannur Gram Panchayat area under Kerala Town Panchayat Planning Act, 2016 implying that the area in question did not even have any area earmarked or designated for any particular purpose, leave alone any area designated for residential purpose by local laws **(ANNEXURE VII)**. In addition, on 26.07.2024, the 5<sup>th</sup> Respondent had obtained a certificate enclosed with 100 m radius key plan from the Secretary, Naduvannur Grama Panchayat stating that the area, in Naduvannur Village where the Site on which the RO is proposed is located, is not a designated residential area as per local laws **(ANNEXURE VIII)**.
- 9) Further, building plan permit allowing construction of the proposed RO was also obtained on 27.01.2024 from the local authority concerned, which again endorses the fact that the RO project is not in violation of any applicable statutory norms. **(ANNEXURE IX)**
- 10) In proposing to put up the RO at the Site the 5<sup>th</sup> Respondent has not committed any illegality nor violated any law and/ or fundamental rights of the Applicant and thus there is no cause of action for the Applicant to file the instant Application.
- 11) The 5<sup>th</sup> Respondent states that there is no illegality nor arbitrariness in the actions of the authorities concerned who on being fully satisfied that the Site and the proposed RO of 5<sup>th</sup> and 6<sup>th</sup> Respondents meet all statutory requirements have approved and issued requisite permissions and No Objection Certificates.

- 12) Despite all these clearances approvals and permissions obtained for the proposed RO, the Applicant has repeatedly challenged the compliance and legality of not only the 5<sup>th</sup> and 6<sup>th</sup> Respondent's actions but also the actions of the statutory authorities, including filing complaints and seeking revocation of the PESO initial approval, all of which have been appropriately addressed by the 5<sup>th</sup> Respondent through timely and factual submissions.
- 13) In light of the above, the present application filed by the Applicant is liable to be dismissed on the following preliminary grounds:
- a. The Applicant in the present Original Application No.188 of 2024 lacks the requisite locus standi to approach this Hon'ble Tribunal under Section 18(1) r/w Sections 14 & 15 of the Act as the Applicant has failed to establish any direct, personal, or substantial interest in the matter that would qualify him to seek relief from this Hon'ble Tribunal. Neither there is any substantial question relating to environment involved nor there is any dispute arising from such question as envisaged under Section 14 of the Act. Similarly, the Applicant has not suffered any injury or damage as conceived under Section 18 of the Act giving reason to claim relief, compensation and restitution as provided under Section 15 of the Act. The mere proximity of the Applicant's property to the proposed RO does not suffice to constitute a direct injury or impact on legally protected rights. It is a well-established principle that generalized apprehension, or speculative harm does not meet the threshold for locus standi before the Tribunal.
  - b. The issues raised by the Applicant do not constitute a substantial question related to environment as required under Section 14 of the Act. The Applicant has failed to demonstrate how the establishment of the RO violates environmental norms or laws specified in Schedule I of the Act. The approvals and clearances for the proposed RO were

obtained after complying with all statutory guidelines, including the CPCB's Office Memorandum dated 07.01.2020. The Applicant's concerns appear to be rooted in individual interest rather than a legitimate environmental interest or concern, rendering the Application unfit for consideration under Section 14 of the Act.

- c. The Applicant has neither made nor substantiated any claim arising out of tangible environmental harm or violation of environmental norms that would justify the intervention of this Hon'ble Tribunal under Section 15 of the Act.
- d. The Application is speculative and devoid of any substantial basis, serving only to disrupt a legally compliant project. It is important to emphasize that the burden rests on the Applicant to demonstrate that his claim raises a substantial question of environmental concern. This principle is supported by precedents where the NGT has dismissed applications deemed frivolous or insubstantial, indicating that mere allegations without credible evidence do not meet the Tribunal's threshold for intervention.
- e. Given that the Applicant has not demonstrated a vested legal interest, nor shown that the matter raises a substantial environmental question or involves the contravention of specific environmental laws outlined in Schedule I, this application is not maintainable under Section 18(1) read with Sections 14 and 15 of the Act. The 5th Respondent prays that this Hon'ble Tribunal dismiss the application as it lacks the necessary elements to establish jurisdiction or warrant intervention.
- f. The 5th Respondent has strictly adhered to the CPCB Office Memorandum dated 07.01.2020. The Site and the RO layout as approved by PESO satisfies the siting criteria prescribed for fuel stations. The Applicant's reliance on the Supreme Court's Civil

Appeal No. 421 of 2022 is otiose as the Site and the proposed RO layout approved by PESO are compliant with the prevailing applicable rules and regulations, particularly the siting criteria under the guidelines for setting up of new petrol pumps dated 07.01.2020 issued by the CPCB.

- g. Official records from the Town and Country Planning Department and certification from Naduvannur Grama Panchayat confirm that the area where the Site is located is not a residential area designated as per local laws.
  - h. In proposing to put up the RO at the Site the 5<sup>th</sup> Respondent has not committed any illegality nor violated any law and/ or fundamental rights of the Applicant and thus there is no cause of action for the Applicant to file the instant Application.
  - i. There is no illegality nor arbitrariness in the actions of the authorities concerned who on being fully satisfied that the Site and the proposed RO of 5<sup>th</sup> and 6<sup>th</sup> Respondents meet all statutory requirements have approved and issued requisite permissions and No Objection Certificates.
  - j. By proposing to establish a RO this 5<sup>th</sup> Respondent is only exercising its fundamental rights guaranteed under Article 19(1)(g) of the Constitution of India. The Applicant does not have a right to prevent this 5<sup>th</sup> Respondent from exercising its right guaranteed under Article 19(1)(g) of the Constitution of India as long as it does not infringe any law.
- 14) Without prejudice to the above, this 5<sup>th</sup> Respondent craves the leave of this Hon'ble Tribunal to advert to the allegations raised in each paragraph of the Application. The allegations raised by the Applicant herein are liable to be dismissed at this very threshold. This 5<sup>th</sup> Respondent denies each and every allegation contained therein except those that are matters on record and specifically admitted as hereunder.

- 15) With regard to the allegations raised in paragraphs 1,2,3 and 4 each and every allegation is denied. This 5<sup>th</sup> Respondent denies the baseless allegations made by the Applicant regarding the cutting of trees on the land owned by the 6<sup>th</sup> Respondent for the purpose of setting up the RO. It is crucial to highlight that the Site in question is solely owned by the father of the 6<sup>th</sup> Respondent who has the lawful authority to make decisions pertaining to its use, provided that such use complies with applicable legal and environmental regulations. Without demonstrating a direct and substantial impact, the Applicant lacks the locus standi to question the activities conducted on the Site that is owned by a third party.
- 16) Furthermore, the Applicant admits to having sent multiple representations to various authorities and, finding no favourable response, filed this Application before the Hon'ble Tribunal. Such repeated actions without substantiating a genuine environmental threat point to an exercise that may be vexatious in nature, rather than one rooted in a genuine concern for the environment. This Tribunal has dismissed similar applications where the claims were found to be driven by personal grievance or lacking in substantive environmental impact, noting that the NGT's purpose is to address significant environmental issues and not to entertain disputes aimed at causing undue hindrance or harassment.
- 17) The 5<sup>th</sup> Respondent denies the claims made by the Applicant concerning the alleged presence of residential buildings and the registration of a society named "Suraksha Residents Association" around the Site where the RO is proposed to be set up. While the Applicant has asserted that there are multiple residential structures in the vicinity and referred to the registration of a local association, it is important to note that these assertions do not and cannot alter the legal and zoning status of the Site.
- 18) As previously noted, the official communication from the Town and Country Planning Department of Kerala and the Naduvannur Grama

Panchayat has confirmed that the area in question is not designated as a residential area. This position is further supported by the issuance of the necessary approvals and certificates, including the DMNOC, PESO initial approval, Building Plan Permit etc., confirming that the Site adheres to all legal and environmental standards for setting up a RO. Moreover, the mere existence of residential structures or a registered association in proximity does not, by itself, establish a violation of the relevant siting criteria set forth by the Central Pollution Control Board (CPCB) as per its Office Memorandum dated 07.01.2020.

- 19) The compliance documents obtained by the 5<sup>th</sup> Respondent demonstrate adherence to the siting criteria. Any possible argument that an area which does not come under any master plan or having not designated as a residential area today under local laws only for the reason of having many residential properties shall necessarily be designated as a residential area in future at the time of making approved master plan or detailed plan by town planning authorities does not hold water.
- 20) With regard to the allegations raised in paragraphs 5,6,7,8, 9 and 10 each and every allegation contained therein is denied except for those that are matters on record and specifically admitted hereunder. The Applicant has placed reliance on OA 86 of 2019 pursuant to which guidelines were issued by CPCB dated 07.01.2020 for setting up of new petrol pumps. The Applicant's assertion that the PESO initial approval issued on 12.08.2021, post-dates the CPCB guidelines effective from 07.01.2020 itself goes to prove that before granting the initial approval, PESO has considered the CPCB guidelines thereby complementing the assertion of the 5<sup>th</sup> Respondent that there is no violation of norms including the CPCB guidelines dated 07.01.2020.
- 21) It is all the more important to note that when a complaint was made by the Applicant to PESO seeking cancellation of the initial approval granted to the 5<sup>th</sup> Respondent, the same was duly disposed by PESO in favour of

the 5<sup>th</sup> Respondent considering the merits of the case. Moreover, the PESO licensing process by itself involves a thorough evaluation of all conditions pertaining to compliance that will encompass guidelines dated 07.01.2020 issued by CPCB as well. Thus, the fact that the PESO initial approval was obtained after 07.01.2020 does not indicate a violation of the guidelines; rather, it reflects the guidelines are taken into account before granting the same.

22) Additionally, the proceedings of the District Magistrate while granting the DMNOC, the letter dated 22.06.2023 from the Local Self Government Department, Government of Kerala, the certificate dated 26.07.2024 enclosed with 100 m radius key plan from the Secretary, Naduvannur Grama Panchayat stating that the area where the Site is located is not a designated residential area as per local laws clearly demonstrate that the Site does not fall foul with any provision of law and more particularly the siting criteria for petrol pumps under the guidelines dated 07.01.2020 issued by the CPCB.

23) By any count, the timeline does not undermine the legality or appropriateness of getting necessary approvals or permissions. Instead, it underscores the 5<sup>th</sup> Respondent's commitment to compliance and due diligence in adhering to all relevant environmental regulations, as mandated by both the CPCB guidelines and the local authorities. The Applicant's argument, therefore, lacks merit and should not affect the validity of the approvals and permissions obtained by the 5<sup>th</sup> Respondent from statutory authorities.

24) Further, the District Magistrate's order dated 01.12.2023 confirms that the Site was investigated by authorities viz., Thasildar Kolzhikode, Regional Fire Officer & Fire Rescue, DSP, Kozhikode Rural Police, Executive Engineer Road Divisions Public Works Department and as such issued the DMNOC for the RO. The 5<sup>th</sup> Respondent relies on the due diligence of authorities in

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V...

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issuing this NOC, which signifies that the Site has been scrutinized for compliance with relevant environmental and safety regulations.

- 25) Regulatory practices indicate that once DMNOC is obtained from the District Magistrate, it provides a justified assurance that the Site and the proposed RO is compliant with prevailing rules and regulations. The positive outcome of the investigative process, as evidenced by the District Magistrate's order, reinforces the position that the 5<sup>th</sup> Respondent has acted in accordance with all applicable regulations and has ensured compliance with the necessary environmental standards, thereby negating the Applicant's claims regarding violations of the CPCB Office Memorandum.
- 26) With regard to the allegation that the RO is an illegal set up as the residents have been fighting against the establishment of the same, it is submitted that, while a local residents' association may exist, its formation does not impact zoning classifications. The area's zoning status must be established through formal plans, which in this case, do not designate the area as residential. As such, the action of the Applicant filing this present Application against the Respondents herein without clarifying whether the Site where the RO is proposed to be set up is a designated residential area, is misconceived and malafide.
- 27) In light of the above submissions, all the grounds raised by the Applicant (A- F in the Application) are denied and are liable to be dismissed at this very threshold. Further, the Applicant's reference to the Supreme Court's decision in Civil Appeal No. 421 of 2022 dated 14.03.2023 is misplaced as the Site and the proposed RO layout approved by PESO are compliant with the prevailing applicable rules and regulations, particularly the siting criteria under the guidelines for setting up of new petrol pumps dated 07.01.2020 issued by the CPCB.

Reliance BP Mobility Limited

  
Authorised Signatory

- 28) The 5th Respondent submits that it has undertaken a thorough due diligence process in accordance with applicable regulations and guidelines. As part of this due diligence, the 5th Respondent procured a detailed feasibility report to assess the viability of the Site and verified compliance with applicable standards (**ANNEXURE - X**). This report serves as a foundational document upon which subsequent steps and decisions have been based, demonstrating the Respondent's commitment to responsible and compliant site selection.
- 29) It is important to highlight that both the Applicant and the 5<sup>th</sup> Respondent have obtained the necessary permits to establish their respective projects i.e., residential house built by the Applicant and proposed RO on the site thus placing them on an equal footing regarding compliance with applicable laws and regulations. The Applicant would have built his residential building after obtaining Building Plan Permit from the local authority and has also got the property tax levied by the municipal authority. The 5<sup>th</sup> Respondent's RO was proposed to be established only after obtaining the PESO initial approval, DMNOC and Building Plan Permit from relevant authorities. The Application of the Applicant questioning the legality and validity of the permissions and approvals sanctioned by the statutory authorities, attempts to dismiss and disregard the due diligence and scrupulous evaluation exercised by them. Such an action would not only contradict the principles of administrative law, but also undermines the statutory safeguards in place designed to ensure compliance with rules and regulations.
- 30) In view of the above submissions, the 5<sup>th</sup> Respondent reiterates that all necessary approvals and clearances for the proposed RO have been obtained after strict adherence to the applicable environmental, safety, and regulatory standards. The Applicant has not demonstrated any substantive environmental harm or contravention of relevant guidelines that would warrant intervention by this Hon'ble Tribunal. The 5<sup>th</sup> Respondent submits that this Application, rooted in speculative apprehensions and lacking any

substantive evidence, does not meet the threshold requirements for maintainability under the National Green Tribunal Act, 2010.

For the reasons stated herein above, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to dismiss the Original Application No.188 of 2024 with costs and thus render justice.

Reliance BP M  
At  
[Signature]

Solemnly affirmed at Chennai on the day of November 2024 and signed his name in my presence.

BEFORE ME

Raghunanda  
12/11/2024 (KAR/3657/2023)  
ADVOCATE::CHENNAI

Ref. No. RBML/ KL/20-21/NRO/LOI-013

Date: 07.05.2021



To,

Mr Shekeen Imbichi Moidy - Proprietor,

M/s Sithara Fuels,

Utharadath Padikkal House, Naduvannur, Koyilandy Taluk, Kozhikode Dist. PO-673 614.

Retail Outlet site Address:

Survey no 198/4, LHS of Naduvannur –Perambra Road (SH 38),

Naduvannur Village, Koyilandy Taluk, Kozhikode Dist, PO 673 614.

Dear Sir,

**Sub: Letter of Intent for appointment of Dealer for Reliance BP Mobility Ltd's (Reliance BP's) Retail Outlet, as a "Dealer Owned Dealer Operated (DODO) Outlet."**

1. We refer to your application no. 013-KLC025 dated 29.03.2021.
2. We have to place on record that during our recent discussions you have –
  - A) represented and warranted to us that: -
    - i) you are not an existing dealer of any oil company; and
    - ii) you have fully appraised yourself of the provisions of all applicable laws and relevant rules, regulations and notifications relating to business of retail sales of petroleum products and allied products; and
    - iii) you do not have any criminal record; and
  - B) During the course of the discussions we confirm having explained to you that,
    - i) We have been granted authorization by the Government of India for marketing and selling Motor Spirit (MS) and High Speed Diesel (HSD) and we are also a parallel marketer of Auto Liquefied Petroleum Gas (ALPG) and hold the required rating certificate for marketing and selling Auto Liquefied Petroleum Gas under the extant Rules and regulations. We are also in process of engaging with various City Gas Distribution Companies for undertaking distribution and supply of Compressed Natural Gas ("CNG") from various retail outlets.
    - ii) That the pricing of Petroleum products is dynamic.
    - iii) That our Retail Selling Price of petroleum products will/ may vary from that of the Retail Outlets of Public sector or Other Oil Companies, and it could be higher, lower or equal to the Retail Selling Price of adjacent retail outlets of other Oil Marketing Companies.
    - iv) There is or will be no financial subsidy or support available to you;
    - v) That no charge, mortgage or hypothecation can be created by you on the Retail Outlet land and /or assets towards security for the repayment of any loan that you may avail for the operation of the retail outlet.

**Reliance BP Mobility Limited.**

**Corporate Office:** Reliance Corporate Park, 5<sup>C</sup>, Second Floor, Thane Belapur Road, Ghansoli, Navi Mumbai 400 701, India.

**Registered Office:** Maker Chambers IV, 3<sup>rd</sup> Floor, 222 Nariman Point, Mumbai - 400 021, India. CIN: U50100MH2015PLC327401

**State Office:** 1<sup>st</sup> Floor, Chandrika Chambers, S.A Road, Vytilla Jn, Cochin – 682019. Kerala. Phone: 0484 4478900.



C) During the course of discussions you have agreed -

- a) To be appointed as non-exclusive Dealer for sales of petroleum products and/or allied at the aforesaid retail outlet at **Survey no 198/4, LHS of Naduvannur – Perambra Road (SH 38), Naduvannur Village, Koyilandy Taluk, P O 673 614, Kozhikode Dist for 30 years;**
  - b) To pay to Reliance BP, within one week from the date of this letter a sum of **Rs 3.54 lacs**(Rupees Three lacs fifty four Thousand only), towards expenses incurred/to be incurred by us as processing charges for processing of documents, administrative expenses etc., plus applicable GST thereon i.e., (Rs.300000+Rs.54000= Rs. 354000) which shall not be refundable under any circumstances. An Invoice in respect of this payment will be issued to you in due course after receipt of the payment.
  - c) To provide an initial non-interest bearing security deposit of Rupees **Twenty Eight lacs (Rs. 28 lacs)** within 15 days of LOI.
  - d) To pay Reliance BP such processing charges and non-interest bearing security deposit as may be determined by Reliance BP towards installation of CNG facility at the Retail Outlet (which shall be at the sole discretion of Reliance BP) within fourteen (14) days of being called upon in writing by Reliance BP.
  - e) To construct, at your own cost, a Retail outlet and lease the Land along with Retail Outlet constructed thereon to Reliance BP for **30 years**.
  - f) To construct, maintain and operate the Retail Outlet in accordance with the standards and guidelines stipulated by us and adhere to the timelines and achieve milestones that may be agreed during the initial joint kick-off meeting and subsequent periodic review and take corrective action as decided during these meetings. Reliance BP shall be entitled to withdraw/cancel the Letter of intent, for any non-adherence to these guidelines/timelines/milestones or non-compliance with the guidelines issued from time to time.
  - g) To meet any and all other terms and conditions intimated by Reliance BP from time to time.
3. Relying upon your aforesaid representations and subject to Title search of your above Land and your fulfilling all the above terms and conditions, it is Reliance BP's intent to appoint you as Dealer for the Retail Outlet located at **Survey no 198/4, LHS of Naduvannur –Perambra Road (SH 38), Naduvannur Village, Koyilandy Taluk, P O 673 614, Kozhikode Dist.**
  4. Kindly note that your appointment is not exclusive and Reliance BP is at a liberty to appoint other dealer/dealers in the foregoing area at Reliance BP's sole discretion.
  5. This Letter of Intent shall be valid for a period of Ninety (90) calendar days from the date hereof, during which period you shall obtain all statutory, approvals, licenses which are required to be obtained by you, and start the construction of Retail Outlet in compliance with the plans and specifications thereof duly furnished by us to you, and also facilitate submission of applications by

**Reliance BP Mobility Limited.**

**Corporate Office:** Reliance Corporate Park, 5C, Second Floor, Thane Belapur Road, Ghansoli, Navi Mumbai 400 701, India.

**Registered Office:** Maker Chambers IV, 3<sup>rd</sup> Floor, 222 Nariman Point, Mumbai - 400 021, India. CIN: U50100MH2015PLC327401

**State Office:** 1<sup>st</sup> Floor, Chandrika Chambers, S.A Road, Vytilla Jn, Cochin - 682019, Kerala. Phone: 0484 4478900.



Reliance BP and follow up/facilitate obtaining of approvals, permissions, licenses which are essential for the commencement work such as NOC of District Authorities, approval from PESO, approval from NHAI/PWD and other authorities as may be required, thereupon an agreement (a copy of which is attached herewith) appointing you as Reliance BP's Dealer for sale of petroleum products (hereinafter referred to as the "the Agreement") shall be executed.

6. The terms and conditions specified herein are not intended to cover all the terms and conditions of the Agreement.
7. In acknowledgement of the acceptance of this Letter of Intent, please sign a copy of this letter in the space provided below and return it to the undersigned, within 7 days from the date of this letter.
8. While returning the accepted copy of this LOI, kindly provide the following information:
  - i.) Name and style of the firm (subject to our approval), in which you would like to operate along with an authenticated copy of the Partnership Deed or any such documents applicable to the particular structure of your firm, if any..
  - ii.) Complete address for correspondence with telephone, e-mail address, and fax numbers
  - iii.) Income Tax Permanent Account Number
9. Upon expiry of this Letter of Intent by efflux of time, neither party shall have any claim of any nature whatsoever against the other

Looking forward to a cordial and mutually rewarding business relationship.

Thanking You,

Yours faithfully,

For Reliance BP Mobility Limited.

Jibu Samuci  
State Business Development Manager – Kerala  
Agreed to and accepted by:

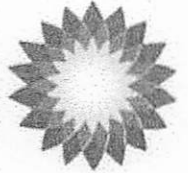
Mr Shekeen Imbichi Moidy – Proprietor --M/s Sithara Fuels

**Reliance BP Mobility Limited.**

**Corporate Office:** Reliance Corporate Park, 5<sup>C</sup>, Second Floor, Thane Belapur Road, Ghansoli, Navi Mumbai 400 701, India.

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**Ref: RBML/DM/NOC/Perambra/21-22/002**

Date: 07/07/2021

To,  
The District Magistrate  
District Collectorate  
Civil Station PO  
Calicut - 673 020.

Dear Sir,

Subject: Application for No Objection Certificate for the proposed New Petroleum Retail Outlet of Reliance BP Mobility Limited at Survey No. 198/4, Naduvannur Village, Koyilandy Taluk, Naduvannur Post, Calicut District, Kerala- 673 614.

We propose to establish a Petroleum Retail Outlet at the said Land situated at Survey No. 198/4, Naduvannur Village, Koyilandy Taluk, Naduvannur Post, Calicut District, Kerala- 673 614.

In view of the above, we enclose herewith 7 copies of drawings duly signed and sealed for you kind perusal.

We would request you to kindly grant "No Objection Certificate" at the earliest in favor of M/s Reliance BP Mobility Limited and forwarding the same along with our application to the Licensing Authority under Petroleum and Explosives Safety Organization (PESO) for obtaining a License in Form XIV, Petroleum Rules 2002.

Kindly issue us 2 copies of approved drawings for our records.

Thanking you,

Yours Sincerely,  
For Reliance BP Mobility Limited.

**Dileep KP**  
State Business Development Manager –Kerala  
(Authorised Signatory)

Encl:a/a

DCKKD/6908/2021-D4

No,1/446951/2021-D4

Procedure dated 01-12-2023 by Additional District Magistrate, Kozhikode

(Presence: Muhammad Rafiq C)

Sub :- Order for grant of no-objection certificate required for obtaining petroleum storage license for setting up petroleum retail outlet at Naduvannoor land in comprised in survey. No. 198/4 of Naduvannoor village in Koyilandi taluk of Kozhikode district - Regarding

Reference:-1.Application dated 07/07/2021 of Reliance BP Mobility Ltd.

2. Report No. TLKKDY/6053/2021-D1 dated 28/06/2022 and 01/11/2023 of Tahsildar, Koilandi

3. Regional Fire Officer's Report No. E-3646/2022 dated 22.10.2022

4. Report No. D2-40422/2023/DR dated 30/09/2023 from District Superintendent of Police, Kozhikode Rural.

6.Report No. dated 10.01.2021 of Executive Engineer from Kerala Public Works Department. ED/NOC/GEN/2021

7. Order No. WF (c) 19348/2023 dated 20.06.2023 of the Hon. High Court

Order No: DCKKD/6908/2021-04 Dated: 01-12-2023

Reliance BP Mobility Limited Company had filed an application for grant of no-objection certificate Rule under 144 of the Petroleum Rules and Regulations, 2002 for the establishment of a petroleum retail out and other petroleum storage license on land included in R.S. No. 196/4 in Naduvannoor village in Koyilandi taluk of Kozhikode district. .

The application was investigated through the (1)Tahsildar, Koilandi (2)Regional Fire Officer, Fire & Rescue.

Kozhikode (3) District Superintendent of Police, Kozhikode Rural (4) Executive Engineer, Roads Division, Public Works Department

According to the investigation reports made available by the Tehsildar, Koilandi vide reference second cited that the proposed land for setting up a petrol pump of Reliance BP Mobility Ltd. is under garden category and is currently there are no boundary disputes or litigation in this land. The land is situated on the west side of the state highway at Ullieri-Perampura SH road. There are no schools, petrol pumps, hospitals, railway canals situated in the vicinity of 50 mts. 10 residential houses, BSNL exchange and 4 commercial buildings have in the vicinity of the land and there are no environmental problems or water flow obstruction due to the installation of petroleum outlet within 50 mts of the specified outlet. It is 10 meters from the house of Shereena Nampyattil, who

DCKKD/6908/2021-D4

complained that the residents and the surrounding residents have filed a complaint against the establishment of the outlet to the District Collector and only 3 out of 10 residential building owners have given their consent. The Tehsildar has recommended as per reference 2<sup>nd</sup> cited that the said place is suitable for setting up a petroleum outlet as there is only a short distance and the place is elevated about 1 m from the road and there are no obstacles for fire prevention and the complaint of the nearby residents can be resolved.

The Tehsildar has certified and submitted including the sketch of the site, Mahassar, Consent, Site plan and other supporting documents.

The Regional Fire Officer, fire and Rescue Division, Kozhikode has provided a no-objection certificate subject to conditions as per reference (3) cited. The District Police Chief Kozhikode Rural has recommended as per reference (4) cited that the new petrol pump of Reliance BP Mobility Limited Company may be given permission.

The Hon. High Court of Kerala in its order dated 05/08/2021 in WP(C) No. 9861/2010 and other related orders GO(MS) No. 67/2020/PWD dated 16/10/2020 Guidelines for access permission to Fuel Stations along State Highways (SH) and major District Roads (MDR) are weakened.

The prior Approval has received from Petroleum & Explosives Safety Organization (PESO) for obtaining petroleum storage license for setting up petroleum retail outlet of Reliance BP Mobility Limited Company Vide No. A/P/SC/KL/14/4429 (1513247) dated 12/08/2022.

A representatives of BP Mobility Limited has informed that as per the Hon. High court order in WPC No. 9881 dated 5-8-2011, and connected cases (GMS) no. 67/2020/PWD dated 16/10/2020, the Govt. Order has been weakened and also said that if the government issues a new order in this regard they will comply with the terms of the order.

Based on the reports shown above and order of Hon. High court of Kerala in WP(C) No. 9881/2020 dated 5-8-21 and connected cases in GO(MS)67/2020/PWD Dated, 16/10/2020 the Government order has been weakened and according to the reports received in this regard it is seen that the no-objection certificate for setting up a petroleum retail outlet on the land can be granted.

In the circumstances it is hereby ordered no objection certificate to Reliance BP mobility company under Rule 144 of Petroleum Rules, 2002 for establishment of petroleum retail outlet on land included in R.S. No. 198/4 at Naduvannur village in Koyilandi Taluk subject to the condition of ensuring adequate security. No-objection Certificate under Rule 144 of the petroleum rules, 2002 shall be prepared separately.

Signed by  
Muhammed Rafeek C  
Date: 01-12-2023 16:10:52

Additional District Magistrate  
Kozhikkode.

DCKKD/6908/2021-D4

✓Recipient :- Reliance BP Mobility Limited Company

Copy:

1. Regional Fire Officer, Fire & Rescue Services, Kozhikode .
2. District Superintendent of Police, Kozhikode Rural
3. Executive Engineer, Public Works Department Roads Division, Kozhikode
4. Tehsildar, Koilandi
5. Village Officer, Naduvannur

I/446951/2023

രേണഭാഷ -മാതൃഭാഷ

കോഴിക്കോട് അഡീഷണൽ ജില്ലാ മജിസ്ട്രേറ്റിന്റെ 01-12-2023 തീയതിയിലെ നടപടിക്രമം

(ഫാജർ: മുഹമ്മദ് റഫീഖ് സി)

വിഷയം :- കോഴിക്കോട് ജില്ലയിൽ കൊയിലാണ്ടി താലൂക്കിൽ നടുവണ്ണൂർ വില്ലേജിൽ നടുവണ്ണൂർ ദേശത്ത് റി.സ നമ്പർ 198/4 ൽ ഉൾപ്പെട്ട സ്ഥലത്ത് പെട്രോളിയം റിട്ടെയിൽ ഔട്ട് ലെറ്റ് സ്ഥാപിക്കുന്നതിന് പെട്രോളിയം സംരംഭണത്തിനുള്ള ലൈസൻസ് ലഭിക്കുന്നതിനാവശ്യമായ നിരാക്ഷേപ സാക്ഷ്യപത്രം അനുവദിക്കുന്നതിന് ഉത്തരവ് - സംബന്ധിച്ച്

- സൂചന :- 1.റിലയൻസ് ബിപി മൊബിലിറ്റി ലിമിറ്റഡിന്റെ 07/07/2021 തീയതിയിലെ അപേക്ഷ
- 2.കൊയിലാണ്ടി തഹസിൽദാറുടെ 28/06/2022, 01/11/2023 എന്നീ തീയതികളിലെ ടിഎൽകെകെഡിഡിവൈ/6053/2021-ഡി1 നമ്പർ റിപ്പോർട്ട്
- 3.റിജിയണൽ ഫയർ ഓഫീസറുടെ 22.10.2022 തീയതിയിലെ ഇ-3646/2022 നമ്പർ റിപ്പോർട്ട്
- 4.ജില്ലാ പോലീസ് മേധാവി കോഴിക്കോട് റൂറലിൽ നിന്നുള്ള 30/09/2023 തീയതിയിലെ ഡി2-40422/2023/ഡിആർ നമ്പർ റിപ്പോർട്ട്.
- 6.കേരള പൊതുമരാമത്ത് വകുപ്പിൽ നിന്നുള്ള എക്സിക്യൂട്ടീവ് എഞ്ചിനീയറുടെ 10.01.2021 തീയതിയിലെ എ5/എൻഒസി/ജനറൽ/2021 നമ്പർ റിപ്പോർട്ട്.
- 7. ബഹു. ഹൈക്കോടതിയുടെ 20.06.2023 ലെ WP (c) 19348/2023 നമ്പർ ഉത്തരവ്

ഉത്തരവ് നമ്പർ: DCKKD/6908/2021-D4 തീയതി: 01-12-2023

കോഴിക്കോട് ജില്ലയിൽ കൊയിലാണ്ടി താലൂക്കിൽ നടുവണ്ണൂർ വില്ലേജിൽ നടുവണ്ണൂർ ദേശത്ത് റി.സ നമ്പർ 198/4 ൽ ഉൾപ്പെട്ട ഭൂമിയിൽ പെട്രോളിയം റീട്ടെയിൽ ഔട്ട് ലെറ്റ് സ്ഥാപിക്കുന്നതിന് പെട്രോളിയം സംരംഭണത്തിനുള്ള ലൈസൻസ് ലഭിക്കുന്നതിന് 2002 ലെ പെട്രോളിയം നിയമങ്ങളും ചട്ടങ്ങളും റൂൾ 144 പ്രകാരം നിരാക്ഷേപ സാക്ഷ്യപത്രം അനുവദിക്കുന്നതിന് റിലയൻസ് ബിപി മൊബിലിറ്റി ലിമിറ്റഡ് കമ്പനി സൂചന (1) പ്രകാരം അപേക്ഷ സമർപ്പിച്ചിരുന്നു.

പ്രസ്തുത സാഹചര്യത്തിൽ ടി വിഷയത്തിൽ തുടർനടപടി സ്വീകരിക്കുന്നതിന്റെ ഭാഗമായി (1) തഹസിൽദാർ, കൊയിലാണ്ടി 2)റിജിയണൽ ഫയർ ഓഫീസർ, ഫയർ & റെസ്ക്യൂ,

I/446951/2023

കോഴിക്കോട്; (3) ജില്ലാ പോലീസ് മേധാവി കോഴിക്കോട് റൂറൽ (4) എക്സിക്യൂട്ടീവ് എഞ്ചിനീയർ, പൊതുമരാമത്ത് വകുപ്പ് റോഡ്സ് ഡിവിഷൻ എന്നിവർ മുഖേന അന്വേഷണം നടത്തുകയുണ്ടായി.

കൊയിലാണ്ടി തഹസിൽദാർ രണ്ടാം പരാമർശം പ്രകാരം ലഭ്യമാക്കിയ അന്വേഷണ റിപ്പോർട്ടുകളനുസരിച്ച് റിലയൻസ് ബിപി മൊബിലിറ്റി ലിമിറ്റഡ് കമ്പനിയുടെ പെട്രോൾ പമ്പ് ആരംഭിക്കുന്നതിനായി ഉദ്ദേശിക്കുന്ന സ്ഥലം തോട്ടം ഇനത്തിൽ ഉൾപ്പെട്ട് വരുന്നതും നിലവിൽ ടി ഭൂമി സംബന്ധിച്ച് അതിർത്തിത്തർക്കങ്ങളോ വ്യവഹാരങ്ങളോ ഇല്ലാത്തതാണെന്നും ടി സ്ഥലം ഉള്ളിയേരി - പേരാമ്പ്ര എസ് എച്ച് റോഡിൽ കരിമ്പാറപ്പൊയിൽ അങ്ങാടിയിൽ സംസ്ഥാനപാതയുടെ പടിഞ്ഞാറ് വശത്താണെന്നും പ്രസ്തുത സ്ഥലത്തിന്റെ 50 മീ. ചുറ്റളവിൽ സ്കൂളുകൾ, പെട്രോൾ പമ്പുകൾ, ആശുപത്രികൾ റെയിൽവേ കനാലുകൾ എന്നിവയൊന്നുമില്ലെന്നും 50 മീ. ചുറ്റളവിൽ 10 വാസഗൃഹങ്ങളും ബി.എസ്.എൻ.എൽ എക്സൈജം 4 വ്യാപാര കെട്ടിടങ്ങൾ നിലവിലുണ്ടെന്നും പെട്രോളിയം ഔട്ട് ലെറ്റ് സ്ഥാപിക്കുന്നത് മൂലം പരിസ്ഥിതി പ്രശ്നങ്ങളോ നീരൊഴുക്ക് തടസ്സപ്പെടുന്ന സാഹചര്യങ്ങളോ നിലവിലില്ലെന്നും നിർദ്ദിഷ്ട ഔട്ട് ലെറ്റിന്റെ 50 മീ. പരിധിയിൽ വരുന്ന താമസക്കാലായവരും പരിസരവാസികളും ഔട്ട് ലെറ്റ് സ്ഥാപിക്കുന്നതിനെതിരെ പരാതി ജില്ലാ കളക്ടർക്ക് നൽകിയതാണെന്നും 10 താമസകെട്ടിട ഉടമകളിൽ 3 പേരിൽ നിന്നും മാത്രമാണ് സമ്മതപത്രം ലഭ്യമായിട്ടുള്ളതെന്നും പരാതി ഉന്നയിച്ച ഷെറീന നമ്പ്യാട്ടിൽ എന്നവരുടെ വീട്ടിൽ നിന്നും ഔട്ട് ലെറ്റ് സ്ഥാപിക്കുന്ന സ്ഥലത്തേക്ക് 10 മീ. കുറഞ്ഞ ദൂരം മാത്രമാണുള്ളതെന്നും ടി സ്ഥലം റോഡിൽ നിന്നും സുമാർ 1 മീ. ഉയർന്നുനിൽക്കുന്നതെന്നും അഗ്നി പ്രതിരോധത്തിന് തടസ്സങ്ങളില്ലാത്തതിനാൽ പ്രസ്തുത സ്ഥലം പെട്രോളിയം ഔട്ട് ലെറ്റ് സ്ഥാപിക്കുന്നതിന് അനുയോജ്യമാണെന്നും സമീപവാസികളുടെ പരാതി പരിഹരിച്ച് ഔട്ട് ലെറ്റ് സ്ഥാപിക്കുന്നതിന് അനുമതി നൽകാവുന്നതാണെന്നും സൂചന 2) പ്രകാരം തഹസിൽദാർ ശുപാർശ ചെയ്തിട്ടുണ്ട്.

ടി സ്ഥലത്തിന്റെ സ്ക്വയർ അടങ്കൽ, മഹസ്റ്റർ, സമ്മതപത്രം, സൈറ്റ് പ്ലാൻ എന്നിവയും മറ്റ് അനുബന്ധരേഖകളും സാക്ഷ്യപ്പെടുത്തി തഹസിൽദാർ സമർപ്പിച്ചിട്ടുണ്ട്.

കോഴിക്കോട് ഫയർ & റെസ്ക്യൂ വിഭാഗം റീജിയണൽ ഫയർ ഓഫീസർ സൂചന (3) പ്രകാരം നിബന്ധനകൾക്ക് വിധേയമായി നിരീക്ഷണ സാക്ഷ്യപത്രം ലഭ്യമാക്കിയിട്ടുണ്ട്. റിലയൻസ് ബിപി മൊബിലിറ്റി ലിമിറ്റഡ് കമ്പനിയുടെ പുതിയ പെട്രോൾ പമ്പിന് അനുമതി നൽകാവുന്നതാണെന്ന് ജില്ലാ പോലീസ് മേധാവി കോഴിക്കോട് റൂറൽ സൂചന (4) പ്രകാരം ശുപാർശ ചെയ്തിട്ടുണ്ട്. ബഹു. കേരള ഹൈക്കോടതിയുടെ 05/08/2021 തീയതിയിലെ WP(c) No. 9881/2020 നമ്പർ ഉത്തരവും മറ്റ് അനുബന്ധ ഉത്തരവുകളിലൂടെയും GO(MS) No. 67/2020/PWD dated 16/10/2020 തീയതിയിലെ Guidelines for access permission to Fuel Stations along State Highways (SH) and major District Roads (MDR) ലെ നിർദ്ദേശങ്ങൾ ദൃഢീകരിച്ചിട്ടുണ്ടായിട്ടുള്ളതാണ്.

ടിസ്ഥലത്ത് റിലയൻസ് ബിപി മൊബിലിറ്റി ലിമിറ്റഡ് കമ്പനിയുടെ പെട്രോളിയം റീട്ടെയിൽ ഔട്ട്ലെറ്റ് സ്ഥാപിക്കുന്നതിന് പെട്രോളിയം സംഭരണത്തിനുള്ള ലൈസൻസ് ലഭിക്കുന്നതിന് പെട്രോളിയം & എക്സിക്യൂട്ടീവ് സേപ്പറ്റി ഓർനൈസേഷൻറെറ (PESO) 12/08/2022 തീയതിയിലെ A/P/SC/KL/14/4429 (P513247) നമ്പർ Prior Approval ലഭിച്ചിട്ടുണ്ട്.

ബഹു. കേരള ഹൈക്കോടതിയുടെ 05/08/2021 തീയതിയിലെ WP(c) No. 9881/20 and connected cases നമ്പർ ഉത്തരവു പ്രകാരം GO(MS) No. 67/2020/PWD dated 16/10/2020

1/446951/2023

സർക്കാർ ഉത്തരവ് ദുർബലപ്പെടുത്തിയ സാഹചര്യത്തിൽ സർക്കാർ ഇതു സംബന്ധിച്ച് പുതിയ ഉത്തരവ് പുറപ്പെടുവിക്കുന്ന പക്ഷം ഉത്തരവിലെ നിബന്ധനകൾ പാലിക്കുമെന്ന് റിലയൻസ് ബിപി മൊബിലിറ്റി ലിമിറ്റഡ് പെട്രോളിയം കമ്പനി പ്രതിനിധി ബോധിപ്പിച്ചിട്ടുണ്ട്.

മുകളിൽ കാണിച്ച റിപ്പോർട്ടുകളുടെ അടിസ്ഥാനത്തിലും ബഹു. കേരള ഹൈക്കോടതിയുടെ 05/08/2021 WP(C) No. 9881/2020 and connected cases നമ്പർ ഉത്തരവ് പ്രകാരം GO(MS)67/2020/PWD Dated, 16/10/2020 സർക്കാർ ഉത്തരവ് ദുർബലപ്പെടുത്തിയ സാഹചര്യത്തിലും ഇക്കാര്യത്തിൽ ലഭിച്ചിട്ടുള്ള റിപ്പോർട്ടുകൾ പ്രകാരവും ബഹു. ഹൈക്കോടതി ഉത്തരവ് പ്രകാരവും ടി ഭൂമിയിൽ പെട്രോളിയം റീട്ടെയിൽ ഔട്ട്ലെറ്റ് സ്ഥാപിക്കുന്നതിനുള്ള നിരാക്ഷേപ സാക്ഷ്യപത്രം അനുവദിക്കാവുന്നതാണെന്നും കാണുന്നു.

ഈ സാഹചര്യത്തിൽ മുകളിൽ കാണിച്ച വകുപ്പുകളിൽ നിഷ്കർഷിച്ചിട്ടുള്ള നിബന്ധനകൾക്കു പുറമെ മതിയായ സുരക്ഷിതത്വം ഉറപ്പാക്കിയിരിക്കണമെന്ന വ്യവസ്ഥയ്ക്കു കൂടി വിധേയമായി, കൊയിലാണ്ടി താലൂക്കിൽ നടുവണ്ണൂർ വില്ലേജിൽ നടുവണ്ണൂർ ദേശത്ത് റി.സ നമ്പർ 198/4 ൽ ഉൾപ്പെട്ട ഭൂമിയിൽ പെട്രോളിയം റീട്ടെയിൽ ഔട്ട്ലെറ്റ് സ്ഥാപിക്കുന്നതിന് പെട്രോളിയം സംഭരണത്തിനുള്ള ലൈസൻസ് ലഭിക്കുന്നതിന് 2002 ലെ പെട്രോളിയം ചട്ടങ്ങൾ റൂൾ 144 പ്രകാരം നിരാക്ഷേപ സാക്ഷ്യപത്രം, റിലയൻസ് ബിപി മൊബിലിറ്റി ലിമിറ്റഡ് കമ്പനിക്ക് അനുവദിച്ചുകൊണ്ട് ഇതിനാൽ ഉത്തരവാകുന്നു. പെട്രോളിയം ചട്ടങ്ങൾ, 2002 ചട്ടം 144 പ്രകാരമുള്ള നിരാക്ഷേപ സാക്ഷ്യപത്രം പ്രത്യേകം തയ്യാറാക്കുന്നതാണ്.

Signed by  
Muhammed Rafeeq C  
Date: 01-12-2023 16:10:52

അഡീഷണൽ ജില്ലാ മജിസ്ട്രേറ്റ്  
കോഴിക്കോട്

✓ സ്വീകർത്താവ് : റിലയൻസ് ബിപി മൊബിലിറ്റി ലിമിറ്റഡ് കമ്പനി

പകർപ്പ്:

- 1. റീജിയണൽ ഫയർ ഓഫീസർ, ഫയർ & റെസ്ക്വ സർവ്വീസസ്സ്, കോഴിക്കോട്
- 2. ജില്ലാ പോലീസ് മേധാവി കോഴിക്കോട് റൂറൽ
- 3. എക്സിക്യൂട്ടീവ് എഞ്ചിനീയർ, പൊതുമരാമത്ത് വകുപ്പ് റോഡ്സ് ഡിവിഷൻ, കോഴിക്കോട്
- 4. തഹസീൽദാർ, കൊയിലാണ്ടി
- 5. വില്ലേജ് ഓഫീസർ, നടുവണ്ണൂർ



भारत सरकार

Government of India

वाणिज्य और उद्योग मंत्रालय

Ministry of Commerce & Industry

पेट्रोलियम तथा विस्फोटक सुरक्षा संगठन (पेट्रो)

Petroleum & Explosives Safety Organisation (PESO)

A और D - विंग, ब्लॉक 1-8, दूसरा तल, शास्त्री भवन, 26 हददुस रोड, नुंगम्बक्कम

चेन्नई - 600006

A & D - Wing, Block 1-8, 2nd Floor, Shastry Bhavan, 26 Haddous Road, Nungambakkam, Chennai - 600006

E-mail : [psc@chennai@explosives.gov.in](mailto:psc@chennai@explosives.gov.in)

Phone/Fax No : 044 - 28287118, 28281023, 28281041, 28287119/28284848

पुर्व अनुमोदन संख्या / Prior Approval No : A/P/SC/KL/14/4429 (P513247)  
संदा में / In,

दिनांक / Dated : 12/08/2021

M/s. RELIANCE BP MOBILITY LIMITED,  
Reliance Industries Ltd, Petroleum Business, 1s,  
8A Road, Vytilla Junction,  
Thiruvananthapuram,  
District: ERNAKULAM  
State: Kerala  
PIN: 682019

विषय / Sub : Plot No. 1984, SH-38 TO ULLYERU/CALICUT TO NADUVANNUR / PERAMBRA, NADUVANNUR, KOYLANDY, Taluka: KOYLANDY, District: CALCUT, State: Kerala, PIN: 673614 में प्रस्तावित पेट्रोलियम वर्ग A,B Retail Outlet ।  
Proposed Petroleum Class A,B Retail Outlet at Plot No. 1984, SH-38 TO ULLYERU/CALICUT TO NADUVANNUR / PERAMBRA, NADUVANNUR, KOYLANDY, Taluka: KOYLANDY, District: CALCUT, State: Kerala, PIN: 673614

महोदय / Sir/Ms,

कृपया आपके उपर्युक्त विषय से संबंधित पत्र संख्या GIN595702 दिनांक 02/02/2021 का सदरमा प्रेषण करें ।  
Please refer to your letter No. GIN595702 dated 02/02/2021 on the subject.

संबंधित पत्र के साथ अर्पित उपर्युक्त अनुमोदन का सफ्ट (सफ्टवेयर)/से-आउट, अर्थात् दस्तावेज Drawing(s) nos. KLC025-05-F00-P3-1103-00 dated 25/08/2021, KLC025-05-F00-P3-1103-00 dated 25/08/2021 को अनुमोदित किया जाता है तथा प्रत्येक अक्षरों की एक प्रति विधिकृत पुरुषिकृत कर संवर्द्धित कर रहीं हैं ।

The Drawing(s) nos. KLC025-05-F00-P3-1103-00 dated 25/08/2021, KLC025-05-F00-P3-1103-00 dated 25/08/2021, showing the site/you/ construction details forwarded with your letter under reference is approved and a copy(of each) of the same is returned herewith duly signed in token of approval.

**Conditions of the Approval-**

The Chief Controller of Explosives's approval for the convenient store shall be mentioned in the standard notes of the drawings.

अनुमोदित प्लान के अनुसार निर्माण होने के पश्चात पेट्रोलियम नियम 2002 के अंतर्गत प्रारूप XIV में अनुसूचि जारी करने हेतु, कृपया निम्नलिखित दस्तावेज इस कार्यालय को प्रेषित करें ।

On completion of the construction as shown in the approved plan please forward the following documents for grant of licence in Form XIV of the Petroleum Rules, 2002.

1. प्रारूप IX (संलग्न) में विषयित भरा हुआ एवं हस्ताक्षरित आवेदन ।  
Form IX (enclosed) duly filled in and signed.
2. पेट्रोलियम नियम 2002 के तहत अनिच्छानु अनुमोदन पोर्टल पर उपलब्ध ई-भुगतान सुविधा के माध्यम से 10250/- (दसि वर्ष- अधिकतम 10 वर्ष तक) का सातरीस शुल्क ऑनलाइन जमा किया जाना है ।  
A license fee of Rs. 10250/- (per year - maximum upto 10 years) to be submitted online through e-payment facility available on online application portal under petroleum Rules, 2002.
3. अनुमोदित अक्षरों की तीन प्रतियाँ ।  
Three copies of the approved drawings.
4. मुख्य विस्फोटक निरीक्षक, कागपुर द्वारा अनुमोदित सूक्ष्म व्यक्ति व्यूज जारी पेट्रोलियम नियम 2002 (संलग्न) के अंतर्गत नियम 130 और 128 में आवश्यक सेफ्टी और टेक टेड प्रमाण-पत्र जो कि संगठन की वेबसाइट <http://peso.gov.in> पर "सक्षम व्यक्ति" अनिच्छानु मॉड्यूल के माध्यम से जन्यता गया है ।  
Safety and Test Certificate as required under rule 130 and 128 of the Petroleum Rules, 2002 (enclosed) issued by Competent person approved by CCE, Nagpur and generated through On-line Competent Person Module available at <http://peso.gov.in>
5. विना प्राधिकारी से प्राप्त "अनुमोदित प्रमाण-पत्र" की मूल प्रति तथा उनके द्वारा विषयित हस्ताक्षरित एवं कार्यालय की मोहर तथा हुआ संवर्द्धित प्लान ।  
Original copy of 'No Objection Certificate' from the District Authority together with site plan duly endorsed by him with his office seal thereon.
6. इस कार्यालय से होनेवाले पत्राचार पर हस्ताक्षर करने के लिए अधिकृत व्यक्ति(यों) के नामों हस्ताक्षर ।  
Specimen signature(s) of the person(s) authorised to sign the correspondence addressed to this office.
7. अनुमोदित प्लान के अनुसार कार्य के पूर्णता की पुष्टि ।  
A confirmation to the effect that all work as per approved drawings has been fully completed by you in all respects.
8. विभिन्न कोणों से लिए गए पेट्रोल पंप के रफीन फोटोग्राफ का एक सेट ।  
One set of colour photographs of the petrol pump taken from different angles.

जी.एस.आर. 519(3) दिनांक 05/06/2000 द्वारा भारत सरकार, पेट्रोलियम तथा प्राकृतिक गैस मंत्रालय द्वारा अधिसूचित आदेश 2000 के "सॉल्वेंट, रेफिनाई और ब्लॉप (Acquisition, Sale, Storage & Prevention of use in Automobiles)" Order 2000 notified by Government of India, Ministry of Petroleum and Natural Gas vide G.S.R. 519(3) dated 05/06/2000.

कृपया ध्यान में अपने सभी पत्राचार में इस कार्यालय की फाइल संख्या A/P/SC/KL/14/4429 (P513247) का सदरमा दें ।  
Please quote this office file No. A/P/SC/KL/14/4429 (P513247) in all your future correspondences.

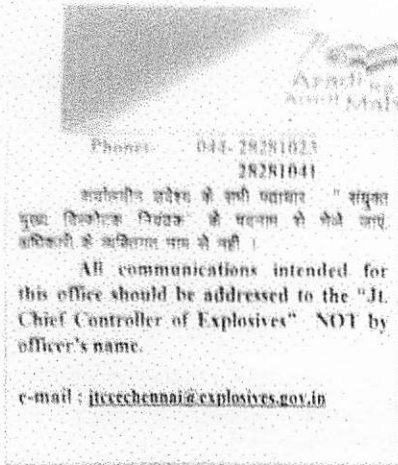
ध्यान में, यह अनुमोदन/अनुमति अन्य प्राधिकारियों से आवश्यक अनुमति/स्वीकृति प्राप्त करने से या तथा लागू अन्य विधियों से मुक्त नहीं देती है ।

This approval/permission, however, does not absolve from obtaining necessary permission/clearance from other authorities or under other statutes as applicable.

भवदीय /Yours faithfully,

(मानोज एन नंदनवर)  
(Manoj N Nandanwar)  
उप विस्फोटक निरीक्षक  
Dy. Controller of Explosives  
उप संयुक्त मुख्य विस्फोटक निरीक्षक  
For Jt. Chief Controller of Explosives  
चेन्नई/Chennai

(अधिक जानकारी के लिए अनुमोदन की स्थिति, शुल्क तथा अन्य विवरण के लिए हमारी वेबसाइट : <http://peso.gov.in> देखें)  
(For more information regarding status, fees and other details please visit our website: <http://peso.gov.in>)  
Note:- This is system generated document does not require signature.



क्रमांक /No. AP/SC/KL/14/4429(P513247)

दिनांक /Dated 18-Jul-23

सेवा में /To,

M/s. Reliance BP Mobility Limited,  
Reliance Industries Limited,  
Petroleum Business, 1s  
SA Road, Vyttila Junction,  
Taluka: Vyttila Junction,  
District: Ernakulam,  
State: Kerala PIN: 682019.

SUB : Proposed Petroleum Class A,B Retail Outlet at PlotNo.198/4, SH-38 to Ulliyeri/Calicut to Naduvannur/Perambra, Naduvannur, Koyilandy, District: Calicut, Kerala, PIN:673614.  
Ref : This office prior approval No.A/P/SC/KL/14/4429(P513247) dated 12/08/2021.

Sir,

Prior approval for construction of a retail outlet at the subject location was granted by this office on 12/08/2021. The approved drawing dated 12/08/2021 shows that you have shown several buildings without mentioning their description within 100 mts.around the proposed retail outlet.

Shri. Muhammed Risham has made a complaint that his house is existing at 6 mts. from the boundary of the proposed premises and 20 mts. from the dispenser of the premises and the approval accorded shall be withdrawn as the premises does not meet the requirements of guidelines of CPCB dated 07/01/2020.

It is inferred that you have suppressed the existence of his house at the above mentioned distance around the premises and obtained the approval.

In light of the above, you are requested to explain as to why the subject approval shall not be withdrawn within 7 days from the date of this letter.

Yours faithfully,

  
(P. SEENTIRAJ)

Dy. Chief Controller of Explosives  
for Jt. Chief Controller of Explosives  
South Circle, Chennai

Copy to: The Dy. Chief Controller of Explosives, Ernakulam for information.

for Jt. Chief Controller of Explosives  
South Circle, Chennai

Reimagining  
mobility



20.07.2023

Ref No.: KL/PESO/NRO/KLC025  
Ref. Prior Approval: A/P/SC/KL/14/4429 (P513247)

To  
The Joint Chief Controller of Explosives,  
A and D - Wing, Block 1-8, Second Floor,  
Shastri Bhavan, 26 Haddous Road,  
Nungambakkam, Chennai,  
Tamil Nadu State. PIN: 600 006.

**Subject: Regarding Proposed Petroleum Class A, B Retail Outlet at Plot No.198/4, SH-38 to Ulliyeri/Calicut to Naduvannur/Permbra, Naduvannur, Koyilandy, District: Calicut, Kerala, PIN: 673614.**

**Ref.: Prior Approval No. A/P/SC/KL/14/4429 (P513247), dated 12.08.2021 &**

**Ref.: Letter issued by Dy. Chief Controller of Explosives, South Circle, Chennai, dated 18.07.2023.**

Respected Sir / Madam,

Reference to proposed Petroleum Class A, B Retail Outlet at Plot No.198/4, SH-38 to Ulliyeri/Calicut to Naduvannur/Permbra, Naduvannur, Koyilandy, District: Calicut, Kerala State which was granted Prior approval for construction by your good office, dated 12.08.2021 & The letter issued by Dy. Chief Controller of Explosives, South Circle, Chennai, dated 18.07.2023, we would like to make our humble submissions on the subject matter as below.

Guidelines issued by the CPCB vide its Office Memorandum dated 07.01.2020 for Setting up of new petroleum pumps captured Supreme Court Judgement states that:

*"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."*

Based on our site survey and also as per the document /letter (Attached as Annexure 1) from the Office of the Joint Director, Civil Station, Kozhikode - 673 020, it has been clarified by the Joint Director that proposed site do not fall under designated residential area as per their records. It has been stated in the letter that, as per Kerala Town & Country Planning Act, there is no master plan or zones designated for the area in which proposed retail outlet is located. Hence, it can be construed that house of the complainant is not falling under the "Residential area designated as per local laws". Hence, distance criteria of 30mts from "Residential area designated as per local laws" in line with CPCB guidelines is not pertinent in this case. We humbly make our submission that, the premises for the proposed retail outlet meets the requirements of guidelines by CPCB, dated 07.01.2020.

We would request your good office not to withdraw the prior license granted for construction at proposed location and we humbly request you to provide us an audience for further guidance on this matter.

Yours truly,

Authorised Signature.  
For Reliance BP Mobility Limited.

Encl.:  
Annexure 1 (Letter from the Office of the Joint Director - Kozhikode (22.06.2023)

Cc:  
The Joint Chief Controller of Explosives, Head Office, Nagpur.  
The Deputy Chief Controller of Explosives, Sub-circle Office, Ernakulam.

Reliance BP Mobility Limited.

Corporate Office: Reliance Corporate Park, 5C, Second Floor, Thane Belapur Road, Ghansoli, Navi Mumbai 400 7

Registered Office: Maker Chambers IV, 3<sup>rd</sup> Floor, 222 Nariman Point, Mumbai - 400 021, India. CIN: U50100M

State Office: 1<sup>st</sup> Floor, Chandrika Chambers, S.A Road, Vytilla Jn, Cochin - 682019. Kerala. Phone: 047

LSGD/JD/KKD/494/2023-HZ

22628/2023



Government of Kerala  
Local Self Government Department

നമ്പർ.LSGD/JD/KKD/494/2023-H2

ജോയന്റ് ഡയറക്ടറുടെ കാര്യാലയം,  
സിവിൽസ്റ്റേഷൻ, കോഴിക്കോട് - 673 020,  
ഫോൺ നം.0495-2371916 , 2371799,  
തീയതി.22-06-2023

e-mail: jdlsgdkzd@gmail.com, ddpkzd@gmail.com

നഗരാസൂത്രകൻ,  
കോഴിക്കോട്.

ശ്രീ.ഷമീൻ ഇമ്പിച്ചി മൊയ്ദി,  
ഉത്തരായത്ത് പടിക്കൽ വീട്,  
വാകയാട്, അവിടനല്ലൂർ,  
നടുവണ്ണൂർ-673614.

സർ,

വിഷയം :- ജോയിന്റ് ഡയറക്ടറുടെ കാര്യാലയം, കോഴിക്കോട് - നടുവണ്ണൂർ  
ഗ്രാമപഞ്ചായത്ത്-മാസ്റ്റർപ്ലാൻ പ്രകാരമുള്ള ഇനം വ്യക്തമാക്കുന്നത്  
സംബന്ധിച്ച്.

സൂചന :- താങ്കളുടെ 01/06/2023-ലെ അപേക്ഷ.

.....  
സൂചന പ്രകാരമുള്ള താങ്കളുടെ അപേക്ഷയിൽ താഴെ പറയുന്ന വിവരങ്ങൾ  
അറിയിക്കുന്നു.

നടുവണ്ണൂർ ഗ്രാമപഞ്ചായത്ത് ഉൾപ്പെടുന്ന പ്രദേശത്ത് കേരള നഗര-ഗ്രാമാസൂത്രണ  
ആക്ട് 2016' പ്രകാരമുള്ള അംഗീകൃത മാസ്റ്റർപ്ലാനോ വിശദ നഗരാസൂത്രണ  
പദ്ധതികളോ നിലവിലില്ല എന്ന വിവരം അറിയിക്കുന്നു.

വിശ്വസ്തയോടെ,  
Signed by  
Girish Kumar T K  
Date: 22-06-2023 16:56:34

22628/2023

28 A

ANNEXURE VII  
(English translation)  
of page 28

LSGD

Number. LSGD/JD/KKD/494/2023-H2

Government of Kerala  
Local Self Government Department

Joint Director Office

Civil Station, Kozhikode-673020

Phone No. 0495-2371916, 2371799

Date: 22-06-2023

email - jdlsgdkzd@gmail.com,  
ddpkzd@gmail.com

Town Planner,  
Kozhikode.

Sri. Shekeen Imbichi Moidy,  
Utharadath Padikkal House,  
Vakayad, Avidanallur,  
Naduvannur - 673614.

Sir,

Subject: Joint Director Office, Kozhikode - Naduvannur  
Gramapanchayath - Regarding Category  
as per Master plan

Reference: Your request dated 01-06-2023.

As per above request following below  
given details is being made known.

As per Kerala Town - Panchayath  
Planning Act 2016, there are no approved master  
Plan or detailed town planning programs in  
Naduvannur Grampanchayath area.

Truthfully  
Signed by  
Girish Kumar TK  
Date: 22.06.2023 16:56:34  
TOWN PLANNER

File Reference No: As/3682...Date: 26/2/24

## CERTIFICATE

This is to certify that the area within 50 meters on all sides from the edge of boundary /fencing of the site proposed for Petroleum Service Station/ Retail Outlet at Survey Nos. 198/4 of Village: Naduvannur, Taluk/Tehsil: Koyilandy, District: Kozhikode, State: Kerala, PIN: 673614 as marked on the proposed site/key plan is not a designated residential area as per local laws. The verified copy of site/key plan is attached with this certificate.

This certificate is issued to Reliance BP Mobility Limited to obtain license for Petroleum Retail Outlet from the Petroleum and Explosives Safety Organisation (PESO) at the above referred Survey Nos.

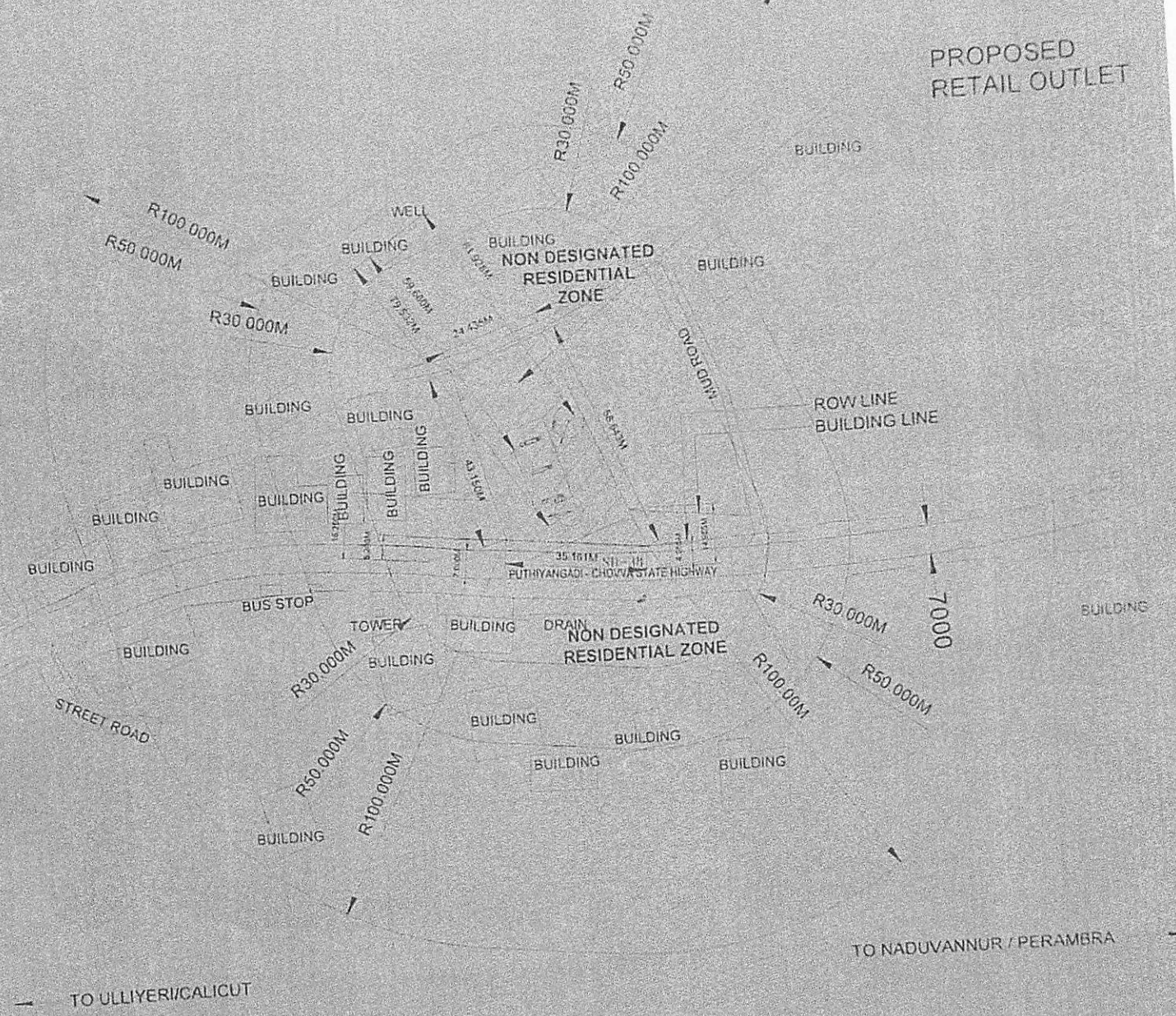
Enclosure: Site / Key plan.



Signature

Name and Designation

Office MANOJ. O.  
PEN: 577245  
SECRETARY  
NADUVANNUR GRAMPANCHAYAT  
Pin. 0496048173



# 100M RADIUS ENLARGE KEY PLAN KLC025-PERAMBRA

M. M. MOJ. O  
Secretary  
Naduvannur Grama Panchayat  
Phone: 9496048173



## APPENDIX B2

[See rule 6(17)&amp;9(4)]

SITE APPROVAL AND BUILDING PERMIT  
Naduvannur Grama Panchayat Kozhikode

Permit No. : A2-BA(84006)/2024		Dated: 06/03/2024													
Ref:- Application No. : A2/728/2024 Dated: 13/02/2024 from Sri/Smt : IMBICHI MOIDI UTHRADATHU PADIKKAL, AVITANALLUR, Vakayad.P.O, Kozhikode, Kerala-673614, India															
Site approval and permission is granted for the <b>Erection, Digging Well</b> in near the building No. <b>12/163</b> in Survey/Re survey No <b>S-198/4 R-198/51, S-198/4 R-198/65</b> Village <b>Naduvannur</b> Taluk <b>Quilandy</b> District <b>Kozhikode</b> for <b>New Construction Hazardous(163 Sqm), New Construction Hazardous(244 Sqm)</b>															
purpose subject to the conditions stated below :															
2 New Construction, 1 unit of Digging Well, Total building Area 407 in Sqmeter. petrol pump with an areasof 407m [Permit is Valid Upto Five Years-(05/03/2029) and Permit for Digging of Well is Valid Upto Three Years-(05/03/2027) and cannot be extended]															
(1) Adequate safety measures shall be ensured for protection against damage to health, life, buildings and property of the workers and inhabitants around, during and after building construction. The owner and the developer shall be solely responsible for any such damages.															
<b>(a) Setbacks (m) (minimum &amp; average)</b>															
Building	Front	Rear Side	Side - 1	Side 2											
1st Construction	31.51	2.04	1.50	3.48											
2nd Construction	8.60	21.00	10.54	8.77											
<b>(b) Plot Area (sq m) - 1412</b>															
<b>(c) FSI : 0.09 Coverage : 28.82</b>															
<b>(d) Details of proposed building</b>															
Construction	Floor	AreaType	Residential	Special Residential	Educational	Medical/Hospital	Assembly	Office/Business	Mercantile/Commercial	Industrial G1	Industrial G2	Storage	Hazardous	Multiplex Complex	Total
1st Construction	Ground Floor	Building Area											163		163
1st Construction	Ground Floor	Floor Area											132.6		132.6
2nd Construction	Ground Floor	Building Area											244		244
2nd Construction	Ground Floor	Floor Area											0.1		0.1

Signature :

Name &amp; Designation : O MANOJ

Secretary

Place : Naduvannur

Date : 06/03/2024

Naduvannur Grama Panchayat Kozhikode





# SAMARA CONSULTANTS & DEVELOPERS

An NSIC Certified Company No. NSIC/GP/COG/2019/69958

Approved to

MINISTRY OF ROAD TRANSPORT & HIGHWAYS

सड़क परिवहन और राजमार्ग मंत्रालय  
भारत सरकार

## FEASIBILITY REPORT FOR THE CONSTRUCTION OF A RETAIL OUTLET ALONG NATIONAL HIGHWAY

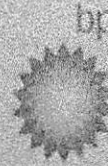
**Location Details** : Sy No:198/51,198/53  
Naduvanur Village  
Koyilandy Taluk  
Kozhikode District, Kerala State

**Stretch** : Puthiyangadi – Chovva Stretch

**STATE Highway** : SH 38

**Name & Address of the Client** : Imbichimoidy Uthradath Padikkal  
s/o Pakkrukutty  
uthradath Padikkal Vakayad  
Avitanallur  
Vakayad  
Quilandy Kozhikode  
Kerala -673614

**Name of the Company** : Reliance BP Mobility Ltd..



Regd Office : 1st Floor, Kondapillil Building, Near Civil station  
Kakkanad, Cochin, Kerala - 682 030 Toll Free No : 1800 891 8560  
+91 9387917560, +91 7306335512 samaraconsultant@gmail.com  
info@samaraindia.in www.samaraindia.in GST No: 32AC0FS2805P12R  
Bangalore | Cochin | Kollam



Dear sir,

**Sub :- Report on feasibility of the proposed fuel station site bearing survey no. 198/51,198/53 in Naduvanoor village, Koyilandy taluk, Kozhikode district on SH38 (Puthiyangadi-Chovva Stretch)**

**Ref :-** (1) site Survey Dated 08.02.2021  
(2) RW/NH-33032/01/2017-S&R Dt 26.06.2020

The feasibility Report on the proposal for the construction of a new retail outlet on SH38 in survey no. 198/51,198/53 in Naduvanoor village, Koyilandy taluk, Kozhikode district, Kerala State enclosed herewith for your reference. The observation given below are based on the above reference (1) and (2)

**OBSERVATIONS**

1. The proposed site is on the LHS of the undivided carriageway of SH 38 (Puthiyangadi – Chovva Stretch) at Naduvannur Village, koyilandy Taluk, Kozhikode District, Kerala state.
2. The Available **Right Of Way** at proposed site location is **11.70m**
3. The **population** of Naduvannur Panchayat is **26,659** as per census 2011 and hence it is falling under Urban stretch.
4. The proposed retail outlet plot is of irregular in shape, available frontage and depth of the plot are 35.07 m and 44 m respectively. Hence it is in compliance with the minimum plot size criteria of PWD Norms which is 30m x 30m for setting up a retail outlet in Urban stretch.
5. The nearest fuel station on opposite side of proposed retail outlet plot is situated at a distance of 1900 towards **Puthiyangadi** side. As per PWD norms the minimum distance between fuel stations should be 300m on both

sides of the highway for undivided carriageway. So the existing site condition is satisfactory.

6. Distance from intersection with any category of road of carriageway width more than 3.5m. There is an intersection road on same side of the plot at a distance of 27m (towards chovva) having a width of 3m. The other road is 105m (towards puthiyangadi) having a width of 3m. There is another intersection at 110m (towards puthiyangadi) having a width of 3m.

According to the PWD guidelines, road with a carriageway width of more than 3.5m and an ROW more than 5.5m should be considered as an intersection. Hence it is in compliance with PWD norms.

7. Location Coordinate of the proposed site is 11.47014,75.77308

8. Traffic volume along this route is comparatively High and the traffic volume 35000 vehicles per day.

#### Remarks

- a) Catch drain as per the design is to be provided along the front boundary of the proposed plot to the entire length and rain water harvesting tank of required capacity is also required.
- b) The minimum distance between Building structure and the plot boundary abutting SH shall be 13m
- c) A toilet block as per PWD Norms is mandatory at the Retail Outlet premises. (Please refer to the figure attached)

14

**Inference:**

With respect to our site visit and PWD norms dated 16.10.2020, we are pleased to inform you that the proposed site is suitable for the construction of a retail outlet.

For Samara Consultants & Developers

*hike*  
Inspected by: Er. FASEEL N.P

Report by: Er. AJMAL BASHEER

Checked by: Er. AGIN ROSE PYNADATH

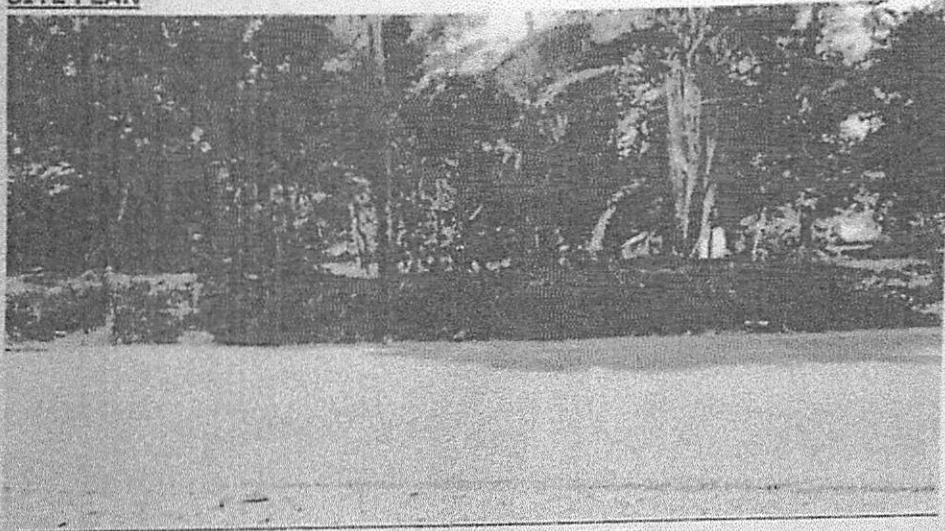
Encl:

1. Site plan
2. Typical Layout of the proposed Retail Outlet
3. Toilet Block drawing as per NH norms



*lx*

**SITE PLAN**

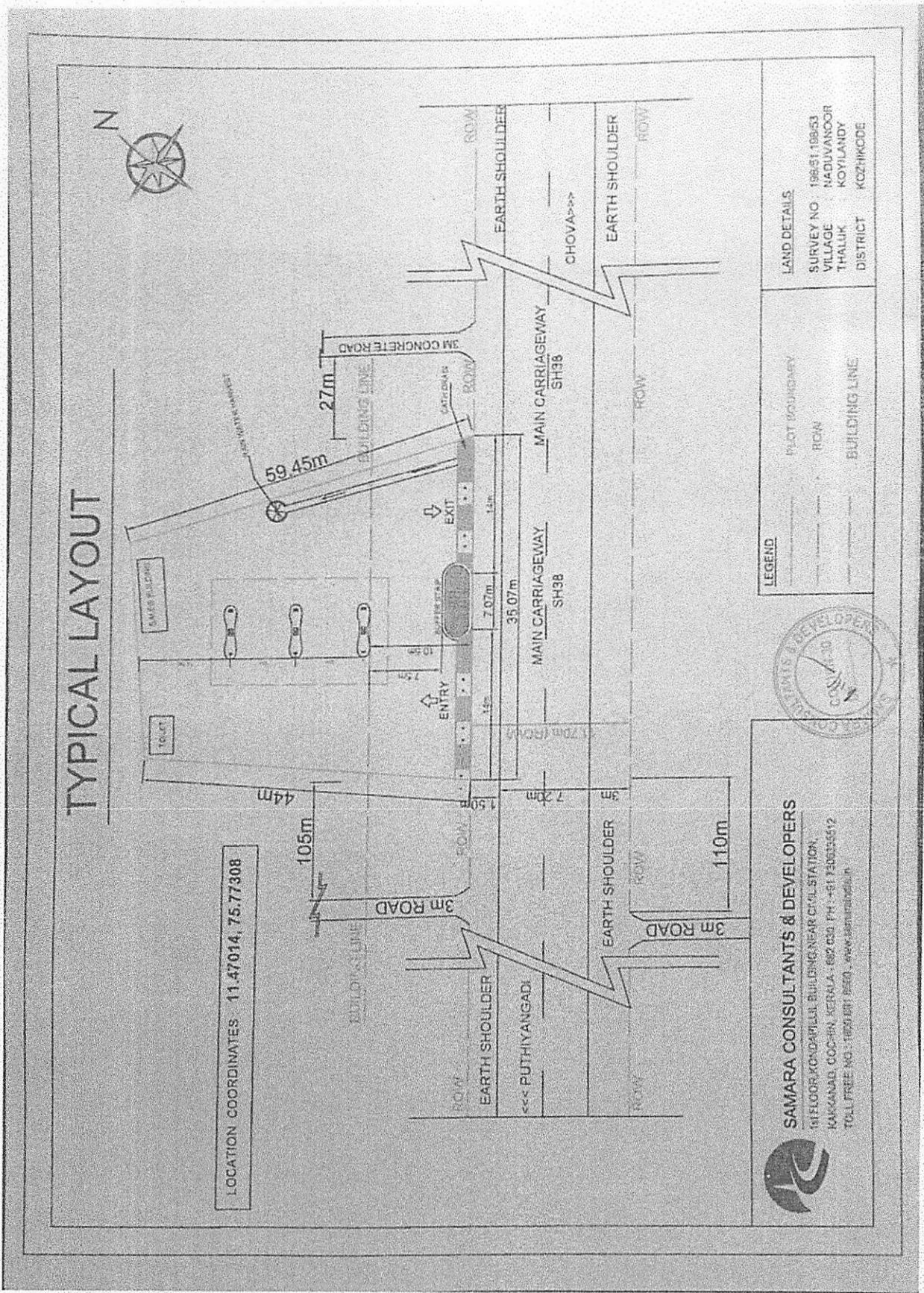


**PROPOSED RETAIL OUTLET**

Google location coordinates: 11.47014,75.77308



M1



TYPICAL LAYOUT

LOCATION COORDINATES - 11.47014, 75.77308

LEGEND

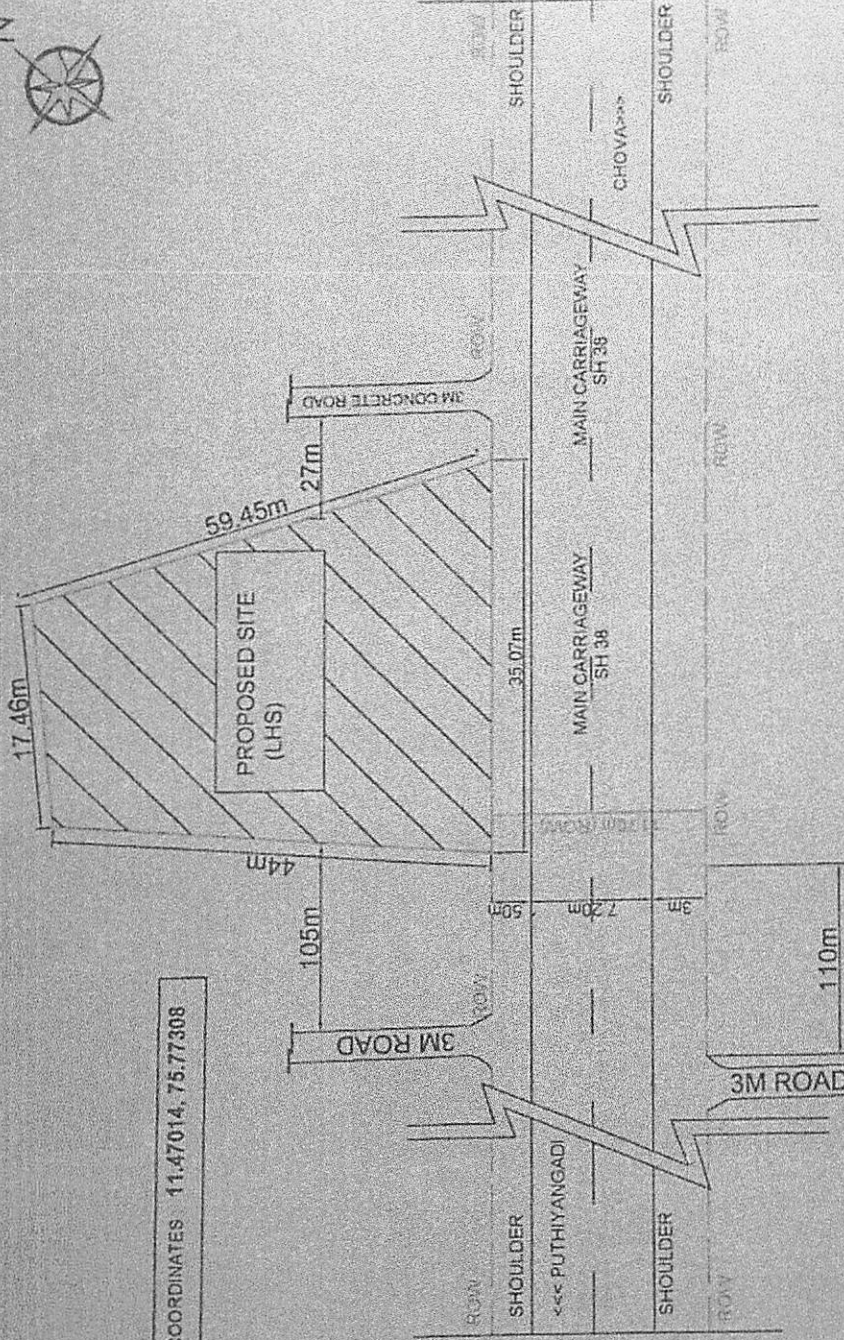
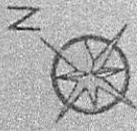
- PLOT BOUNDARY
- ROW
- BUILDING LINE



**SAMARA CONSULTANTS & DEVELOPERS**  
 16 FLOOR KONDAPILAI BUILDING NEAR CIVIL STATION,  
 KAKKANAD COCHIN, KERALA - 682 033. PH - +91 7320315512  
 TOLL FREE NO. - 1653811 0500. WWW.SAMARADEV.COM

LAND DETAILS  
 SURVEY NO. 198/ST/198/53  
 VILLAGE NADUVANCOOR  
 THALUK KOYLANDY  
 DISTRICT KOTHIKODE

**SITE PLAN**



LOCATION COORDINATES 11.47014, 75.77308

**LAND DETAILS**

SURVEY NO.	19845/19A53
VILLAGE	NADUVANKOOR
THALUK	KOVELANDY
DISTRICT	KOZHIKODE

**LEGEND**

● PLOT BOUNDARY  
 --- PROPOSED ROW

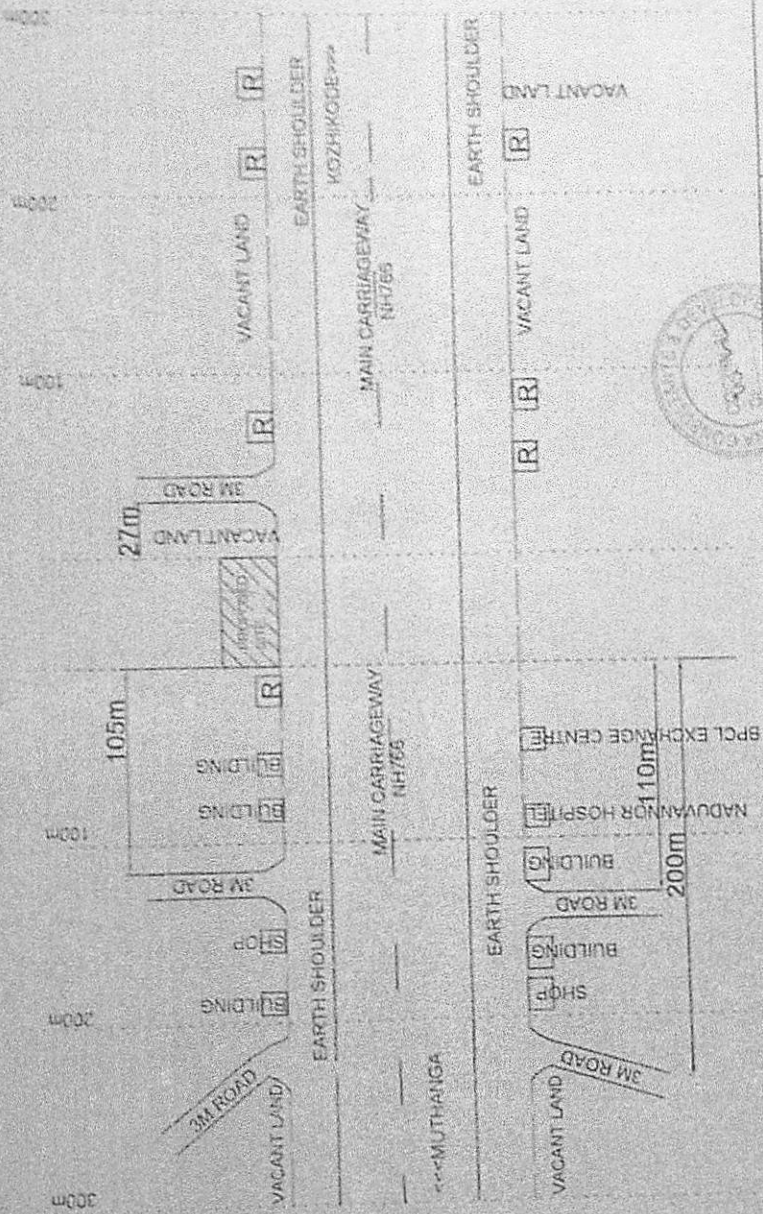


**SAMARA CONSULTANTS & DEVELOPERS**  
 1st FLOOR, KONDAPILLIL BUILDING NEAR CIVIL STATION,  
 KANKANAD, COCHIN, KERALA. - 682 030. PH. +91 7309335512  
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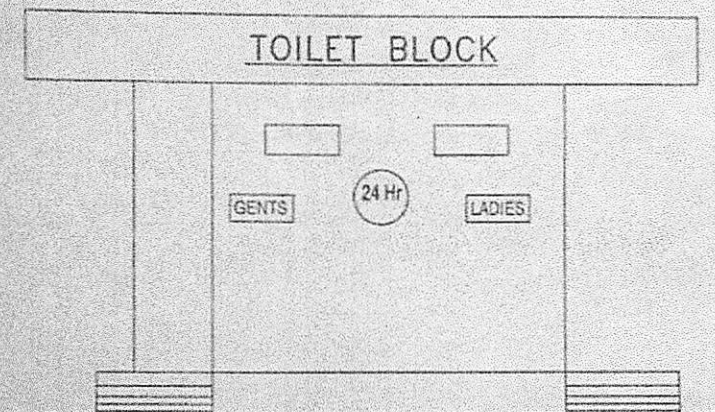
# SITE PLAN

LOCATION COORDINATES 11.47014, 75.77305

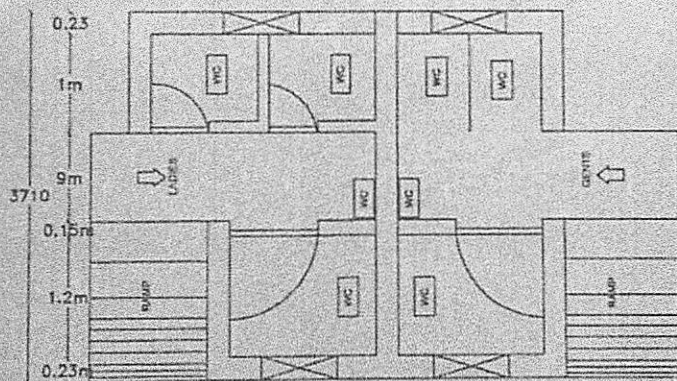
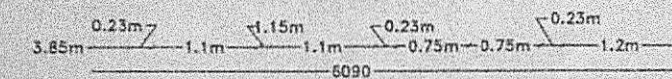


LEGEND	LAND DETAILS
	SURVEY NO 1985/51, 1985/53 VILLAGE NADUVANNOOR THALUK KOYILANDY DISTRICT KOZHIKODE
	Remarks

**SAMARA CONSULTANTS & DEVELOPERS**  
 THE PLOT DEVELOPERS, P. 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000



FRONT ELEVATION OF TOILET BLOCK



PLAN OF TOILET BLOCK

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE**

**O.A.No. 188 of 2024**

Muhammad Risham

.... Applicant

Versus

District Collector, Kozhikode  
& 5 Ors

.... Respondents

**COUNTER AFFIDAVIT FILED ON BEHALF OF THE 5<sup>th</sup> RESPONDENT  
ALONG WITH ANNEXURES.**

**M/s. KING & PARTRIDGE**

**C.MOHAN**

**M.KUMARESAN**

2<sup>nd</sup> Floor, Catholic Centre,  
No. 108, Armenian Street,  
Chennai – 600 001.

Mob:9840029865

9942036873

Email: [chevananmohan@gmail.com](mailto:chevananmohan@gmail.com)

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