

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE AT  
CHENNAI**

**(Under Section 14, 15 read with 18(1) of the National Green Tribunal  
Act, 2010)**

**Original Application No. 220 of 2024**

N. Ravichandran

...Applicant

Vs.

District Collector, Collectorate, Mayiladuthurai & Ors.

...Respondents

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Dated on this the 25 day of April, 2026

Through



A. Yogeshwaran

Counsel for the Applicant

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

Ph No. 9566254546



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... Respondents

**REJOINDER FILED ON BEHALF OF THE PETITIONER**

I, N. Ravichandran, S/o. Natesan, aged about 59 years, residing at 8/5, Vadakku Theru, Pillaiyar Koil Street, Mel Nangur, Kathiruppu Post, Sirkazhi Taluk, Mayiladuthurai District – 609106 do solemnly affirm and sincerely state as follows:

1. I am the applicant herein and I am aware of the facts and circumstances of the case and competent to affirm this affidavit. I have read the reports and counter affidavit filed by the 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> Respondents and deny the same as false, except to the extent expressly admitted hereunder.
2. I submit that I deny the contents of para 2 to 5 of the report filed by the RDO, Sirkazhi on behalf of the 1<sup>st</sup> Respondent as false and put the Respondent to strict proof of the averments therein. I submit that the Respondent has failed to respond to the averments raised in the application.
3. I submit that in para 4, the Respondent has suppressed the houses, temples, shops etc. located in the vicinity of the 3<sup>rd</sup> Respondent unit. Curiously, in para 4, the Respondent has stated that on the southern side, "a house, more house situated beyond 350 meters. No approved housing plots are here". It is submitted that the fact that Nangur is an ancient village and that the market place, houses in the village are located within 500 meters from the

*N. Ravichandran*

hot mix plant has been suppressed and a strange assertion has been made in para 4.

4. I submit that even this admission in para 4 proves that the 3<sup>rd</sup> Respondent unit is located in violation of the siting guidelines for hot mix plants.
5. I submit that the 2<sup>nd</sup> Respondent TNPCB has filed two reports dated 26.12.2024 and 24.09.2025 and I deny the contents of the same as false, except to the extent expressly admitted hereunder. I submit that I am not traversing the reports parawise and submit the following response.
6. I submit that the 2<sup>nd</sup> Respondent has only relied on the alleged certificate dated 22.09.2023 issued by the Thasildhar and the BDO's certificate dated 22.10.2023 in support of the contention that there are no "approved residential habitations / approved layouts" within 500 meters. It is submitted that these letters have not been filed by the Respondents. The fact that houses, temples and shops etc. are located all around the hot mix plant is not denied. The Respondents are misdirecting themselves by stating that there are no approved layouts. I submit that in any village, especially ancient villages such as the present, there is no concept of approved habitation or approved layout. It is not the Respondent's contention that the entire Nangur village is illegal. It is only in areas being developed now, after the advent of Town Planning laws that layout approval etc. are in vogue. In fact, the Respondents admit that the area is a non-planned area.
7. It is a matter of record and fact that houses are present and the market of the village itself is within 500 meters from the unit. In fact, this Hon'ble Tribunal on 13.08.2025, was pleased to observe as follows

*"Let the Revenue divisional Officer also file a report as to how the 'No objection Certificate' was issued, when there are residential houses within the prohibited distance."*

*[Handwritten Signature]*

8. However, no such explanation has been furnished to this Hon'ble Tribunal till date. It is submitted that para 11 of the report dated 24.09.2025 of the 2<sup>nd</sup> Respondent, it has been stated that there is a house located 80 meters from the unit. It is not known why a true and complete picture was not presented to this Hon'ble Tribunal. If the reasoning of the Respondent is accepted, then in all villages, especially ancient, old villages which have been inhabited for centuries will be exposed to pollution from hot mix plants like the present. Houses in these villages are not illegal by any stretch of imagination. This Hon'ble Tribunal in Muhammed Risham Vs. District Collector Office, Kozhikode and Ors. (O.A. No. 188 of 2024 in NGT SZ), in the context of CPCB guidelines on siting criteria has already held that in areas that are not planned, presence of houses will have to be taken into account as a disqualifying factor.
9. I submit that the contentions regarding pollution are denied as false and admittedly the Respondent has not inspected the plant when it was operational. The pollution caused by the Respondent has been detailed in the application and are not repeated in the interest of brevity.
10. I submit that the contents of the counter affidavit filed by the 3<sup>rd</sup> Respondent are denied as false and the Respondent blatantly denies that any houses, temples etc. are located in the vicinity of the plant.
11. I submit that the satellite imagery of the area of 500 meters radius around the 3<sup>rd</sup> Respondent clearly shows the presence of houses and the entire village infrastructure and this has not been denied by the Respondents. I submit that I caused a survey of the area through a Government licensed surveyor and the report measuring the distance from houses, temples etc. is filed along with this reply.



12. It is submitted that the fact that houses, temples etc. are located within 500 meters is not a fact in dispute and the 3<sup>rd</sup> Respondent has been permitted in complete violation of the siting criteria prescribed by the TNPCB and its operations have caused serious pollution.

It is therefore humbly prayed that this Hon'ble Tribunal may be pleased to allow the Application as prayed for and thus, render justice.

Solemnly affirmed and signed his name ]  
 this the 25<sup>th</sup> day of April, 2026 at ]  
Sirkali ]

*N. Ravi*

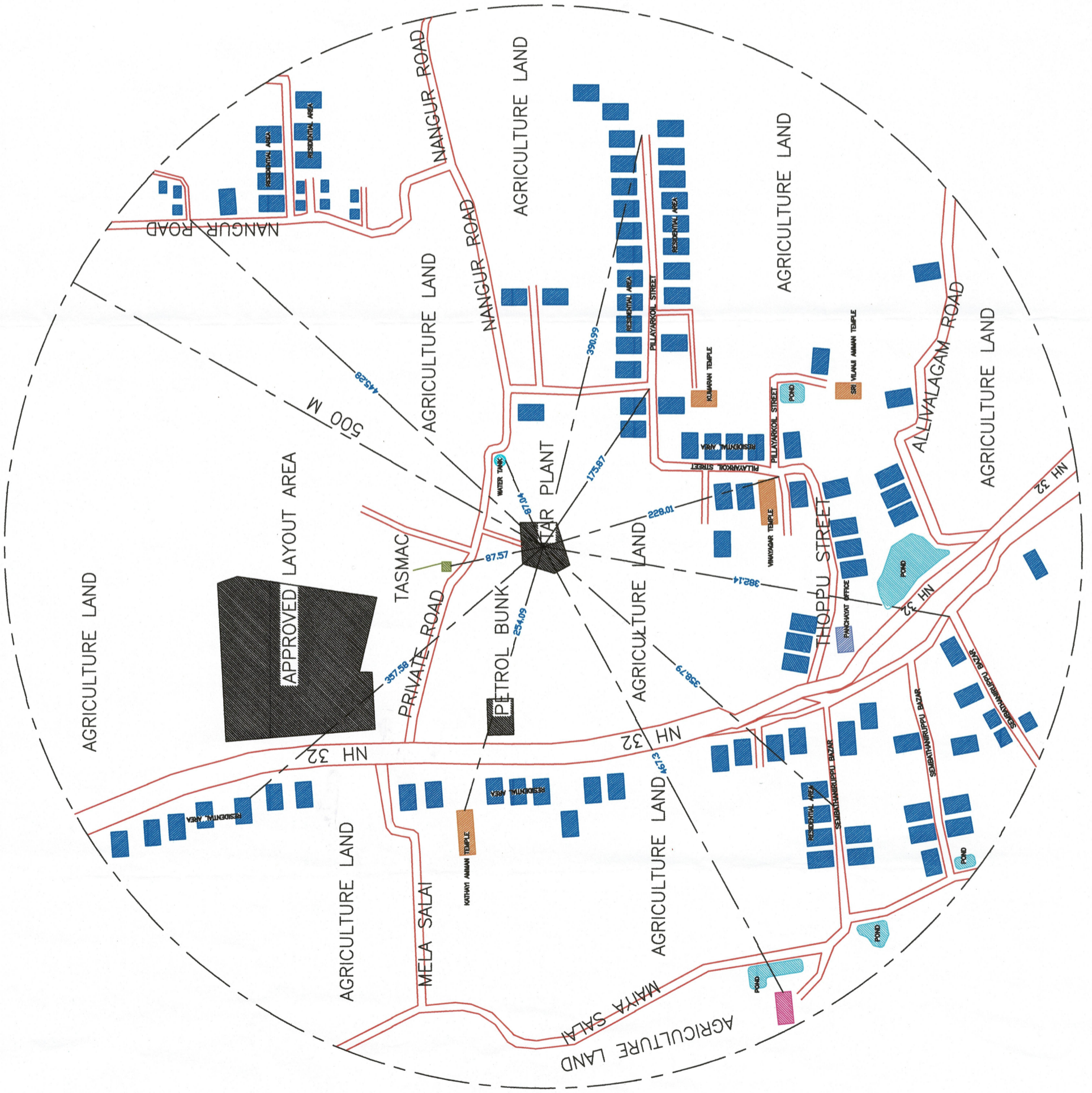
BEFORE ME

*[Signature]*  
 25/4/2026



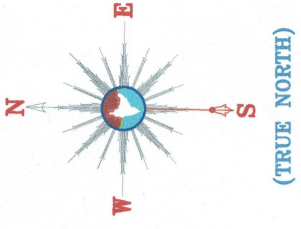
**V. VENKATESAN, B.A., B.L.,**  
 Advocate & Notary Public,  
 Cutchery Road,  
 Sirkali-609 110.

# Topo Plan Showing Around the radius of 500 M for the PETROL BUNK & TAR PLANT At Kathiruppu Village, East Cost Road ,Mayiladuthurai District



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## Annexure A1



NOTE  
ALL DIMENSIONS ARE IN METER  
SCALE --- 1 : 1000

COLOR INDEX	---
ROAD	---
RESIDENT BUILDING	---
TEMPLE BUILDING	---
HOSPITAL BUILDING	---
POND	---
WATER TANK	---
PANCHAYAT OFFICE	---
TASMAC	---

OWNER

SURVEYOR

*Spalenny vs*  
**Er. Balamurali Shivasanmugam**  
 Government Licensed Surveyor  
 Mayiladuthurai.  
 License No : 2024/18/0020  
 Cell : +91 96295 85058

AUTHORIZATION



Office of Yogeshwaran A <officeofyogeshwaran@gmail.com>

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## Service of Rejoinder in O.A. No. 220 of 2024 - N. Ravichandran vs. DC and Ors.

1 message

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Office of Yogeshwaran A <officeofyogeshwaran@gmail.com>

Sun, Apr 26, 2026 at 10:57 AM

To: ssjtnpcb@gmail.com, dshanmuganathan@outlook.com, drshanmuganathantnoffice@gmail.com

Sir,

Please find attached the rejoinder in the subject mentioned Original Application.

Kindly treat this as a service on the Respondents and acknowledge the receipt of the same.

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Sincerely,

Yogeshwaran A

Ph no: 9566254546



**OA 220 of 2024 Rejoinder.pdf**

5060K



Office of Yogeshwaran A <officeofyogeshwaran@gmail.com>

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**Service of Rejoinder in O.A. No. 220 of 2024 - N. Ravichandran vs. DC and Ors.**

1 message

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**Office of Yogeshwaran A** <officeofyogeshwaran@gmail.com>  
To: kmvijayanassociates@gmail.com

Sun, Apr 26, 2026 at 11:17 AM

Sir,


Please find attached the rejoinder in the subject mentioned Original Application.

Kindly treat this as a service on the Respondents and acknowledge the receipt of the same.

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Sincerely,  
Yogeshwaran A  
Ph no: 9566254546

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