

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

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

Original Application No. 303 of 2024 (SZ)

BETWEEN

1. K. Balasubramanian

19/1, Rasikumaripalayam,
Mohanur, Namakkal- 630 015.

2. Ramkumar Krishnan

Son of Krishnan,
3/199-A, Muthuraja Street,
Valaiyapatti, Namakkal, Valayapatti,
Tamil Nadu- 637 020.

...APPLICANTS

-Vs-

**1. The Government of Tamil Nadu
Represented by Chief Secretary**

Fort St. George,
Chennai- 600 009.
Email: cs@tn.gov.in
Mob: 25671555

2. The Secretary

Industries, Investment Promotion and
Commerce Department
Fort St. George, Chennai- 600 009.
Email. indsee@tn.gov.in
Mob: 25671383

**3. The Principal Secretary to the
Government of Tamil Nadu
Revenue and Disaster Management**

No. of Pages: 1
No. of Corrections:

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

Fort St.George, Chennai- 600 009.
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4. The Managing Director

SIPCOT,

19 A, Rukmani Lakshmi pathy Road,
Egmore,
Chennai – 600 008.
Email: md@sipcot.in
Mob: 45261770

5. The District Collector

District Collectorate,
Thiruchengode,
Namakkal-Trichy Road,
Namkkal – 637 003.
Email: Collrnmk@nic.in
Mob: 04286-281100

...RESPONDENTS

REPLY FILED ON BEHALF OF THE FOURTH RESPONDENT

I, Thiru. Pon Arul Thilagavathy, W/o. M.Rajasekar, Hindu, aged about 54 years, currently working as Deputy General Manager (Legal), State Industries Promotion Corporation of Tamil Nadu Limited (SIPCOT), Chennai 600 008, do hereby solemnly affirm and sincerely state as follows:

1. I am the 4th Respondent herein and as such I am well acquainted with the facts and circumstances of this case as per the case records available in the office.

No. of Pages:
No. of Corrections:

2

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

2. I respectfully submit that the Applicants have filed the present Original Application before this Hon'ble Tribunal with a prayer to quash the order of the 2nd Respondent made in G.O. MS. NO. 75 of the Industries, Investment Promotion and Commerce Department, dated 08.07.2024, which relates to the administrative sanction granted by the Government of Tamil Nadu for establishing SIPCOT industrial park in accordance with the provisions of Tamil Nadu Industrial Purposes Act 1997. The administrative sanction given by the Government of Tamil Nadu after detailed deliberation had been questioned by the Applicant on the allegation that the lands to be acquired includes agriculture lands, grazing lands and alleged water bodies.

3. I respectfully submit that the Applicant has filed this Original application with Interim prayer to pass an order of Interim Injunction, injuncting the Respondent's 1 to 5 and their agent's, men's, representatives from proceeding further, pursuant to G.O.Ms.75 dated, 08.07.2024.

No. of Pages:
No. of Corrections:

3

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

4. At the outset, I am advised to submit that this application is liable to be dismissed as premature as it challenges the administrative sanction granted by the government, which is the forerunner for commencing the acquisition proceeding in accordance with the provisions of Tamil Nadu Acquisition of Land for Industrial Purposes Act stated supra.
5. I respectfully submit that the Administrative Sanction is merely a communication between the requisitioning body and the acquisitioning body before the acquisition of land. The current Original Application, thus, has no cause of action and hence, it is liable to be dismissed as premature.
6. I respectfully state that the Respondents deny all the averments contained in the application, except those that are specifically admitted hereinafter. Before responding to the averments contained in the application, the brief facts of the case for appreciation of this Hon'ble Tribunal are as follows.

No. of Pages:
No. of Corrections:

4

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

BRIEF FACTS OF THE CASE

The brief facts are as follows:

7. It is submitted that the Government of Tamil Nadu, in pursuance of the announcement in the Tamil Nadu State Legislative Assembly, in its Revised Budget for the year 2021-2022, announced its decision that new SIPCOT Industrial Parks will be created in Industrially backward districts such as, Tiruvannamalai, Dharmapuri, Tirunelveli, Virudhunagar, Sivakangai, Villupuram, Namakkal, Theni and Nagappattinam.

8. It is submitted that following the announcement made above, the Managing Director, SIPCOT, Chennai addressed the District Collector, Namakkal on 24.03.2022 to identify about 1000-2000 acres of land in a potential area in their district suitable for industrial use for formation of the Industrial Park. Pursuant to the said request, the District Collector, Namakkal, identified and reported about 716.83 acres of both patta and poramboke land comprised in Valayapatti, N. Pudupatti, Arur and Parali villages of Mohannur Taluk, Namakkal District. Based on the details furnished by the District Collector, SIPCOT sent Land Plan

No. of Pages:
No. of Corrections:

5

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

Schedule for the above extent to the District Collector for obtaining Administrative Sanction of the Government for acquisition of the land identified above. However, subsequent to the field inspection, the scheme area had undergone revision and the District Collector, finally reported to SIPCOT about 806.29 acres of land both patta and poramboke identified in Valayapatti, N. Pudupatti and Arur Mohannur Taluk, Namakkal District. Accordingly, SIPCOT sent revised Land Plan Schedule to the District Collector for obtaining Administrative Sanction of the Government for acquisition of 806.29 acres.

9. It is submitted that in continuation, the District Collector, Namakkal has sent Administrative Sanction Proposals to Commissioner of Land Administration and based on the recommendation of Commissioner of Land administration, the Government had accorded administrative sanction to acquire 326.43.50 Hectare (806.29 acres) of patta and poramboke land in total as per orders issued in G.O. Ms. No 75 Industrial, Investment Promotion and Commerce Department dated 08.07.2024 with the condition that the land should not be

No. of Pages:
No. of Corrections:

6

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.



Deputy General Manager (Legal)

covered by water bodies. The details of land to be acquired and alienated, mentioned in the G.O, is as below:

S.No	Name of the villages	Total Patta land in hectare	Total Poramboke land in hectare	Total land in hectare
1	Valayapatty	83.16.15	95.67.35	178.83.50
2	N.Phudhupatty	112.11.00	19.09.00	131.20.00
3	Arur	-	16.40.00	16.40.00
Total in Hectare		195.27.15	131.16.35	326.43.50
Total in Acre		482.32	323.97	806.29

10. It is humbly submitted that the details of lands which are registered as Government Poramboke lands, to be alienated to SIPCOT under the regulations of R.S.O 24, are as detailed below.

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.

No. of Pages:
No. of Corrections:

7


Deputy General Manager (Legal)

List - A
ASSESSED WASTE DRY LANDS

S.No	Block No	Survey No	Area in Hec
N.Pudupatti			
1	2	854/1B	0.31.00
2	8	311/B2A	0.03.00
3	8	311/B2B	0.08.00
4	8	311/B2G	0.09.50
5	8	311/B2H	0.52.50
		Total	1.04.00
Valayapatti			
1	1	682/1	0.11.50
2	3	756/2B	0.38.50
3	3	756/3A	0.06.50
4	3	757/4A	0.01.50
5	3	697/2	1.49.00
6	3	698/2	1.83.50
7	3	704/1	0.34.00
8	5	763/2	0.15.00
9	5	763/3	0.24.50
10	5	767/1	0.89.00
11	5	768/1	1.27.00
12	6	711/1	0.40.50
13	6	712/2	0.07.50
14	6	713/2	0.09.50
15	7	120/2	0.33.50
16	7	120/5	0.09.50
17	7	121/1	0.36.50
18	7	121/8	0.07.00
19	7	122/4	0.91.00
		Total	9.15.00
Arur			
1	1	667/1	16.40.00
Grand Total			26.59.00

No. of Pages:
No. of Corrections:

8

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

List - B

UNASSESSED WASTE DRY LANDS

S.No	Block No	Survey No	Area in Hec
N.Pudupatti			
1	1	61/1	2.80.50
2	4	883/1	1.73.50
3	5	889/2	0.73.00
4	5	889/4	1.88.00
5	5	894/1	0.43.00
6	6	881/1	0.15.50
7	8	311/B2K	0.18.00
		Total	7.91.50
Valayapatti			
1	1	678	1.45.50
2	1	679	2.73.00
3	2	687/1	0.16.00
4	3	697/1	0.80.00
5	3	757/3	0.10.00
6	4	162/1	0.23.00
7	4	162/5	0.28.00
8	4	703	5.03.00
9	4	758/1	0.33.00
10	5	750	2.23.00
11	5	751	2.13.00
12	5	752/2	2.52.00
13	5	753/3	2.09.00
14	5	754/3	2.23.00
15	5	755/3	2.34.00
16	5	762/3	0.37.00
17	5	765	2.03.00
18	5	764	4.14.00
19	5	766/3	1.38.00
20	5	767/2	1.31.00

No. of Pages:

9

No. of Corrections:

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

21	6	710	1.61.00
22	6	714	2.49.50
23	6	759/1	3.02.00
24	6	760	2.66.00
25	6	761	4.47.00
26	6	769	4.88.00
27	7	83/1	1.85.21
28	7	84/1	0.12.53
29	7	120/1	3.94.00
30	7	121/2	0.20.50
31	7	121/4	2.00.50
32	7	122/1	1.62.00
		Total	62.76.74
Arur			
Nil			
Grand Total			70.68.24

List - C

CART TRACK WASTE DRY LANDS

S.No	Block No	Survey No	Area in Hec
N.Pudupatti			
1	5	885/1	0.22.50
2	5	888/2	0.05.00
3	5	894/2	0.40.00
4	6	864	0.50.00
5	6	892/3	0.11.00
6	6	892/4	0.12.50
7	6	892/5	0.07.50
8	7	895/2	0.10.00
9	7	897/1	0.48.50
10	7	899/1	0.25.00
11	7	900/1	0.07.00
12	7	900/3	0.15.00
13	8	311/B2N	0.60.50

No. of Pages:

10

No. of Corrections:

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

14	8	311/B20	0.29.00
		Total	3.43.50
Valayapatti			
1	3	698/1	0.35.00
2	5	753/1	0.06.00
3	5	763/1	0.10.00
4	7	118/6	0.49.50
		Total	1.00.50
Arur			
Nil			
Grand Total			4.44.00

List - D
GRAZING GROUNDS DRY LANDS

S.No	Block No	Survey No	Area in Hec
N.Pudupatti			
1	5	894/3	0.20.00
2	6	891	1.66.50
3	7	899/5	2.25.50
4	6	890/3	1.07.50
		Total	5.19.50
Valayapatti			
1	5	762/1	1.51.00
2	2	691	5.49.00
3	6	649/1 (Part)	15.74.00
		Total	22.74.00
Arur			
Nil			
Grand Total			27.93.50

No. of Pages:
No. of Corrections:

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

List - E
WATER COURSE DRY LANDS

S.No	Block No	Survey No	Area in Hec
N.Pudupatti			
Nil			
Valayapatti			
Nil			
Arur			
Nil			

TOTAL ABSTRACT

List - A	Assessed waste dry lands in all the 3 villages	26.59.00 Hec
List - B	Un Assessed waste dry lands in all the 3 villages	70.68.24 Hec
List - C	Cart Track lands in all the 3 villages	4.44.00 Hec
List - D	Grazing grounds in all the 3 villages	27.93.50 Hec
List - E	Water bodies ponds, canals, river etc in all the 3 villages	Nil
	Total	129.64.74 Hec

11. It is humbly submitted that out of List A to E, the lands listed in List A and B are assessed and unassessed dry lands and hence, they are unobjectionable lands. With regard to the lands listed in List C, the applying body, while applying for approval of

No. of Pages:

12

No. of Corrections:

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

Layout before the concerned Local Bodies and Director of Town and Country Planning, will ensure that necessary provisions will be made in the layout to form roads for public thorough fare as per Tamil Nadu Town and Country Planning Act 1971. As for the grazing grounds in List D, necessary alternative government lands, if available in the nearby vicinity, will be reclassified as grazing lands. Otherwise, the subject transfer of grazing land will be placed before the Empowering Committee constituted by the Government to resort the issues to exempt the provision of providing alternative land. With respect to List E, it is categorically stated that there are no water bodies such as ponds, canals, or rivers on the lands proposed for alienation to SIPCOT. Any allegations suggesting otherwise are entirely false and factually incorrect. No lands pertaining to water bodies are sought to be acquired.

PARAGRAPH-WISE REPLY TO THE APPLICATION

12. The averments contained in Para No. 1 relates to the personal details of the Applicant. The averments in Para No. 2 of the application relates to the prayers sought for in the application.

No. of Pages:
No. of Corrections:

13

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

13. The averments contained in Para No. 3 of the application are categorically denied as being factually and legally untenable. As already submitted, the issuance of an administrative sanction by the Government to a requisitioning authority does not, in any manner, confer a cause of action to challenge the proposed acquisition proceedings. Any such challenge at this preliminary stage is wholly premature and misconceived. It is pertinent to point out that Section 3 of the Tamil Nadu Acquisition of Land for Industrial Purposes Act, 1997 expressly provides for a structured enquiry process. This includes the issuance of a show cause notice to all landowners and interested parties, inviting their objections for due consideration by the competent authority. The statutory mechanism ensures that all grievances are heard at the appropriate stage and by the appropriate forum. In view of the above, the Applicant has prematurely invoked the jurisdiction of this Hon'ble Tribunal, without establishing a valid cause of action. The assertions made in Paragraph 3, alleging violations of environmental law and infringement of the rights of agriculturists, are matters squarely falling within the scope of the enquiry under Section 3 of the Tamil Nadu Acquisition of Land for Industrial

No. of Pages:
No. of Corrections:

14

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

Purposes Act, 1997 and ought to be raised before the designated authorities therein. Moreover, the claim that the impugned proceedings are contrary to judgments of the Hon'ble Courts is entirely unsubstantiated, as the Applicant has failed to cite or rely upon any specific ruling in support of this contention.

- 14.** The averments in Para Nos. 4 and 5 affirmatively support the case of the Respondents. These averments clearly indicate that even at the stage of granting administrative sanction, the Government had duly considered all relevant factors and had consciously limited the proposed acquisition to lands that are unaffected by any water bodies. With regard to the remaining allegations in Paragraph 4, the Applicant is put to strict proof thereof. It is submitted that the process of selecting the site for the proposed SIPCOT Industrial Park involved a comprehensive and meticulous evaluation. Initially, the feasibility of locating the project in the village of Parali was examined, along with other alternative locations. However, based on a thorough assessment of technical, environmental, logistical, and infrastructural parameters, a reasoned decision was taken to establish the project in the villages of Valayapatti, N. Pudupatti, and Arur. This

No. of Pages: 15
No. of Corrections:

15

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

decision was not arbitrary, but the result of a careful and structured decision-making process, taking into account the overall suitability of the site for industrial development in alignment with public interest and sustainable planning norms. Therefore, it is emphatically submitted that the Government of Tamil Nadu granted administrative sanction only after due diligence and detailed deliberation, considering all relevant aspects.

15. It is humbly stated that with regard to Para No. 6 in the application, the statements made therein represent the Applicant's personal opinions, which are not reflective of the actual facts pertaining to the lands proposed for acquisition or transfer under RSO 24. The allegations are general in nature and lack any specific correlation to the subject lands. It is reiterated that no water bodies are included in the lands proposed to be transferred to SIPCOT. The lands identified for the establishment of the SIPCOT Industrial Park in Mohanur Taluk, as per the impugned Government Order, consist solely of Ryotwari Dry Lands. No lands classified as wetlands or those requiring water supply for agricultural purposes are included in the acquisition or

No. of Pages:
No. of Corrections:

16

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

transfer. Consequently, the allegation that the proposed acquisition would disturb water sources is factually incorrect and without basis. Further, no ecological imbalance or adverse environmental impact has occurred or is anticipated as a result of the proposed development. A tentative list detailing the survey numbers and extent of the subject lands is annexed with this Reply for the perusal of this Hon'ble Tribunal. It is also submitted that there exists no legal prohibition or environmental constraint on the acquisition of dry lands classified as grazing grounds. The objection raised in this regard is devoid of merit, unsustainable in law, and liable to be rejected.

- 16.** It is humbly submitted that with regard to Para No. 7 in the application, the lands proposed for acquisition for the SIPCOT Industrial Park are classified solely as dry lands. No wetlands registered under any irrigation sources have been included in the acquisition process. Therefore, after deep analysis of the revenue records and subsequent field visit, it is hereby denied that the Patta lands, comprising an extent of 195.27.15 hectares, are fertile agricultural lands. There are no water bodies involved in the proposed acquisition proceedings. The other

No. of Pages:
No. of Corrections:

17

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

averments relating to canals and rivers in Para 7 are strongly denied and the Applicant is put to strict proof of the same.

17. It is humbly submitted that with regard to Para Nos. 8 & 9 in the application, the averments that the impugned project is designed in a manner that will severely affect agriculturists and cause significant damage to the environment are hereby denied. There is no basis for the allegation that the water bodies will be destroyed as claimed by the Applicants. The proposed acquisition is inclined with the theory of sustainable development without any adverse impact on ecology and environmental protection.

18. It is respectfully submitted that, with regard to the averments contained in Para No. 10 of the application, the contentions raised by the Applicant are purely speculative, lacking any basis in fact or substantiating evidence. The Applicant, without undertaking any proper assessment of the ground realities or presenting research-based data, has made a hypothetical assertion that the proposed acquisition would render the area uncultivable. Such claims are unsubstantiated and unsupported by any empirical analysis. In any event, it is reiterated that none

No. of Pages: 18
No. of Corrections:

18

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

of the water bodies listed by the Applicant, nor the ayacut areas dependent on them, are included in the lands proposed for acquisition or transfer to SIPCOT. The Applicant has also failed to produce any credible documentary evidence to support the claim that check dams, canals, or other irrigation-related infrastructure are affected by the proposed project. Therefore, these averments are baseless.

- 19.** It is humbly submitted that with regard to Para No. 11 of the application, an extent of 27.93.50 hectares of Government lands, classified as grazing grounds, is included in the proposed area of lands acquired for the purpose of forming the SIPCOT Industrial Park. The Revenue Administration will identify similar lands or lands with double the extent in the villages or their vicinity, and reclassify them as grazing grounds. In the event that such lands are not available, the matter will be referred to the Empowering Committee constituted by the Government for consideration of exemption and relaxation to the extent possible in order to facilitate the implementation of the project.

No. of Pages:
No. of Corrections:

19

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

20. It is humbly submitted that with regard to Para No. 12 of the application, as a matter of fact, the main stream of the Karaibotan river flows through the village of Valayapatti (3.51acres), which is situated on the eastern side of the land acquisition field in the survey number 385/1 and is 1.5 km away from the land acquisition field (Survey number: 83). The wetland registered under the river source with an ayacut extent of 70.89.5 hectares (survey number: 566), located in Valayapatti village, is 450 meters away from the proposed acquisition lands. Neither the river nor its sluices pass through the remaining villages of N. Pudupatti and Arur. Therefore, none of the ayacut lands registered under this waterbody will be adversely affected by the acquisition of lands for the SIPCOT Industrial Park. The Applicant's apprehension that the water bodies will be disturbed by this acquisition is unfounded and it appears that the Applicants are attempting to obstruct the land acquisition proceedings by raising concerns about the water bodies solely to support their claims.

21. It is humbly submitted that with regard to Para Nos. 13 & 14 of the application, the details of the cultivated area and its

No. of Pages:

20

No. of Corrections:

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

produce, among other factors, were thoroughly examined by the applying body prior to the finalization of the project. Then, the proposal was subsequently approved by the Government as these details align with those in similar cases where acquisition proceedings have been initiated. It is further submitted that any landowner claiming to be aggrieved is at liberty to raise objections during the enquiry proceedings under Section 3(2) of the Tamil Nadu Acquisition of Land for Industrial Purposes Act, 1997, before the Land Acquisition Officer and Special District Revenue Officer (Land Acquisition), who will consider such objections on their merits and pass appropriate orders. The references made by the Applicant regarding the alleged presence of deer and the dependence on meikal poromboke lands are unsubstantiated personal assertions. These claims, if genuinely believed to be relevant, may be presented with proper supporting evidence during the enquiry under Section 3(2) of the Tamil Nadu Acquisition of Land for Industrial Purposes Act, 1997, wherein all such matters will be duly assessed in accordance with law.

22. It is humbly submitted that with regard to Para No. 15, the resolutions of the Gram Panchayat were duly considered prior to

No. of Pages:
No. of Corrections:

21

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

the finalization of the project and the Government has taken an informed decision in this regard. The objective was to make Tamil Nadu the most industrially advanced State in India, thereby increasing employment opportunities in rural area and enabling balanced regional growth of industries impartially across the State of Tamil Nadu. It is widely acknowledged that there has been a significant migration of agriculturists and villagers from rural to urban areas in pursuit of stable employment and improved livelihoods through industrial opportunities and the vast employment opportunities created in urban areas. Considering all these important factors in the light of the objections raised by the gram panchayats and the people of the area, an appropriate decision was taken to acquire the lands for the purpose of establishment of an industrial park. Such an action had been approved by the Hon'ble Supreme Court as an aspect of sustainable development and hence, the allegations of the Applicant, that the action of the Government is in violation of the judgments of the Hon'ble Courts and environmental laws of the lands, are not sustainable in law. Further, the Applicant has not specifically mentioned any judgment of the Courts of Law and the relevant provisions of the environmental laws which they have

No. of Pages:

22

No. of Corrections:

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.



Deputy General Manager (Legal)

averred to have been violated. Hence, factually also, the allegations are bereft of particulars and devoid of merits.

23. It is humbly submitted that with regard to Para No. 16 of the application, the authorities of SIPCOT have obtained all necessary permissions and consents from the Tamil Nadu Pollution Control Board for the earlier projects. Prior to implementing the project, the applying body will ensure that all required approvals as mandated by law are duly obtained and adhered to. Further, according to the District Census Handbook, Namakkal- Census of India 2011¹, the suppressed class, namely the Scheduled Caste and Scheduled Tribe, account for nearly 23% of the population of the district. The Government is committed to improve and enhance the livelihoods of the socially marginalized people. Further, out of the total of 8,98,245 workers, more than 50% are non-agricultural workers. Namakkal district is noted for truck and lorry external body building industry, which dates back to 1956. Throughout India, Tiruchengode in the Namakkal district is known for its body building for truck, trailer, tanker and rig units. Finished trucks and rig units are exported to foreign

countries from Namakkal. There are about 300 units in Namakkal and 100 units in Tiruchengode in the Namakkal district which are engaged in truck body building activity. Ashok Leyland's Driver Training Institute in Namakkal serves as the first of its kind to have been established in Namakkal. Apart from this, the poultry industry also plays an important part in the economy of Namakkal. Thus, these factors were duly considered by the authorities in arriving at the decision to promote the economic development of the district and to uplift both, the marginalized communities and the industries that contribute to the nation's foreign exchange earnings. Accordingly, the decision to acquire the lands was taken only after careful and comprehensive deliberation of all relevant considerations. The individual interests which the Applicant is espousing has to give way to the overwhelming public interest behind the acquisition of the subject-matter lands. Hence, the allegations to the contrary contained in Para No. 16 are denied. The statistics given by the Applicant regarding the number of factories and the related allegations are vague and unspecific as the Applicant has not stated his own source of information, nor has attached the relevant records regarding the same. Further, the general

No. of Pages:
No. of Corrections:

24

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

allegation made by the Applicant regarding the TDS levels being high in the Namakkal District and the pollution of the water in lakes, rivers, ponds and agricultural lands can only be stated to be denied when there are no specific particulars for this Respondent to rebut. Hence, the averments in this para are totally baseless.

24. The allegations contained in Para No. 17 are denied. The health and hygiene of the residents of Namakkal District have always been accorded the highest priority. It is incomprehensible to the Respondent how the statements made by the Applicant in Para 17 could be construed as militating against the establishment of an industrial park, which is intended to facilitate the upliftment and economic development of the local population—particularly those from marginalized communities—by improving their standard of living and livelihood. The establishment of the industrial park forms part of a broader objective to ensure balanced and inclusive development across the districts of the State. In any event, concerns relating to public health and environmental pollution shall be addressed appropriately and in a timely manner as and when they arise, in

No. of Pages:
No. of Corrections:

25

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

strict compliance with applicable laws and conditions of the approval prescribed by the statutory authorities.

25. It is humbly submitted that with regard to Para No. 18 of the application, the allegation regarding a decrease in groundwater levels is hypothetical and can primarily be attributed to weather conditions, particularly during periods of drought. Such occurrences are common in areas where the project is being implemented. SIPCOT has not received any reports of groundwater level depletion at any of its previously implemented project sites. Moreover, the establishment of an industrial park in a given area is not, in itself, known to have any adverse impact on groundwater levels. The Applicant's presumption to the contrary is unfounded and unsupported by any geological study or empirical research. The assertion of severe water scarcity allegedly resulting from declining groundwater levels is entirely unsubstantiated. No scientific study or report by any independent body has been cited in support of the averments made. Accordingly, the allegations contained in Paragraph 18 are devoid of merit and are liable to be rejected in their entirety.

No. of Pages:
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26

For STATE INDUSTRIES PROMOTION
CORPORATION OF TAMILNADU LTD.


Deputy General Manager (Legal)

- 26.** It is humbly submitted that with regard to Para No. 19 and 20 of the application, the averments are merely a repetition of the water bodies issue. As no wetlands were included in the land acquisition process undertaken by SIPCOT, these averments lack merit and any basis whatsoever. Further, the cases said to have been registered against persons in the district are matters relating to public order and rule of law and the Applicant is put to strict proof of the other averments and allegations contained para 19.
- 27.** It is humbly submitted that the averments made are general in nature. Any hardship that may be faced by the villagers as a result of the implementation of the SIPCOT Industrial Park will be duly considered by the Government, which shall take appropriate remedial measures, as may be warranted.
- 28.** It is humbly submitted that with respect to the grounds set forth in the Application, it is respectfully submitted that a specific rebuttal to each and every ground will be advanced at the time of oral arguments and through written submissions, as the issues raised are essentially mixed questions of law and fact, if not pure questions of law.

In light of the above submissions, this Respondent prays that the Hon'ble Tribunal may be pleased to accept the same and pass appropriate orders, and thus render justice.

For STATE INDUSTRIES PROMOTION CORPORATION OF TAMILNADU LTD.



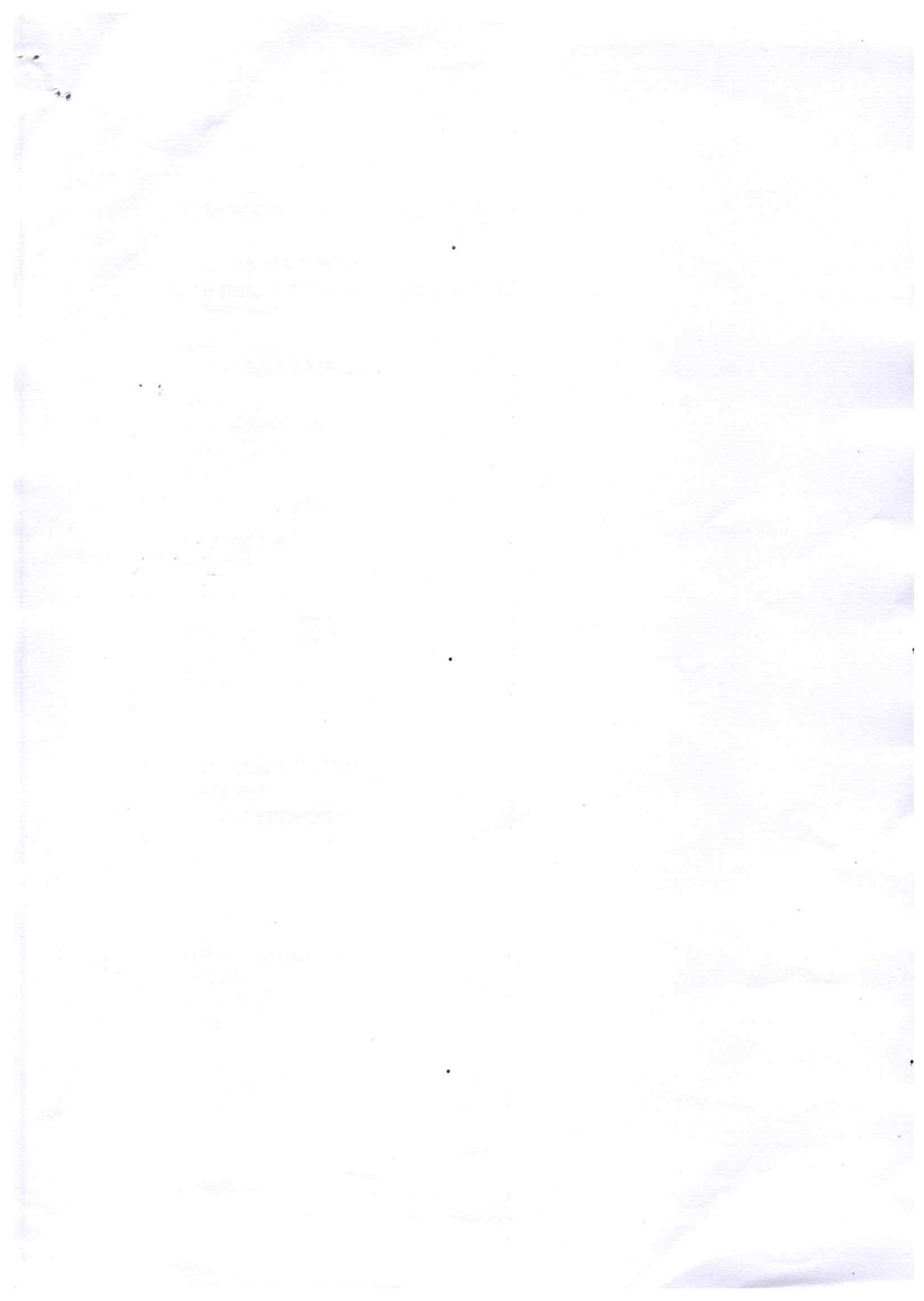
Deputy General Manager (Legal)

Solemnly affirmed on this the
day of June 2025
and signed his name
in my presence



BEFORE ME

A. B. (4022/2019)
B. Balaji
No. 390, New Addl. Law Chambers,
MC Building, Chennai - 104.
ADVOCATE



**BEFORE THE HON'BLE NATIONAL
GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI
Original Application No. 303 of 2024 (SZ)**

IN THE MATTER OF:

K. Balasubramanian,
Namakkal and Another.

...Applicant(s)

Vs.

The Govt. of Tamil Nadu,
Rep by its Secretary,
Chennai and Ors.

...Respondent(s)

**REPLY FILED ON BEHALF
OF THE
FOURTH RESPONDENT**

Advocate for Respondent
Thiru. Abishek Murthy,
& Kritheeshwaran,
Advocate, Chennai.