

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

Original Application No. 89 of 2025

K.CHANDRASEKARAN
10A/1 Ekambaranather Koil Sannathi Street,
Kanchipuram – 631502
Ph:9443691337
Email: chandroo_1961@yahoo.com

...Petitioner

Vs

1. The Secretary to Government
Education Department,
Secretariat, Chennai – 600009,
Email:schsec@tn.gov.in
2. Chief Education Officer
Education Department,
Kanchipuram – 631502
Email:jtcche@nic.in
3. Inspector of Matriculation School,
Near Rangasamy Kulam (MM Avenue)
Kanchipuram – 631501
Email: deepr@tnpcb.gov.in
4. District Education Officer (Private Schools)
Collectorate Campus,
Kanchipuram – 631501
Email: jceemchn@tnpcb.gov.in
5. The Secretary/Correspondent
Sri Narayanaguru Matriculation School,
No:21/1 Ekambaranather Koil sannathi street,
Kanchipuram-631502
Email:sngms.kpm@gmail.com
6. The President,
Sree Narayana Dharma Sanghom Trust,
Sivagiri mutt Varkala,
Thiruvananthapuram-695141
Email:sivagirimutt@gmail.com

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SECRETARY,
SREE NARAYANA GURU MATRIC. HR. SEC. SCHOOL,
21-21/1, Ekambaranathar Sannathi Street,
KANCHIPURAM - 631502,

7. District Environmental Engineer
Tamilnadu Pollution Control Board,
Plot No. C.P.5-B SIPCOT Vandalur Walajabad Road,
Sriperumbadur, Oragadam
Kanchipuram – 602105
Email:tnpcb.deespr@yahoo.com

... Respondents

COMMON REPLY STATEMENT FILED BY RESPONDENTS 5 & 6

1. The 5th Respondent is the Secretary/Correspondent of Sri Narayanaguru Matriculation School, having address at Number 21/1, Ekambaranathar Sannathi Street, Kancheepuram, 631502.

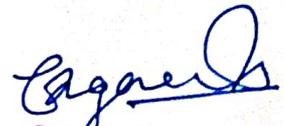
The 6th Respondent is the President, Sree Narayana Dharma Sanghom Trust, Sivagiri Mutt, Varkala, Thiruvananthapuram- 695141.

The address for service of notice, process and summons on the Respondents 5 and 6 is that of their advocates, M/s Ganesh & Ganesh, Mr. S. Saravana Kumar, Mr. K. Jayaraman, Mr. J. Sriram and Mrs. L. Preethi having their office at No.19, Old No.10, Kondi Street, 1st Floor, Parrys, Chennai 600001.

2. The 6th Respondent is the Trust which is managing the affairs of the 5th Respondent School. Hence this Reply statement is being filed in common by the Respondents 5 & 6.

3. The Respondents 5 & 6 at the outset submit that the Original Application filed by the Petitioner is not maintainable and the same is with a vexatious and oblique motive. It is without a genuine cause and so the Application is required to be dismissed with punitive costs being

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KANCHIPURAM - 631502.

imposed on the Petitioner. The Petitioner is a trouble maker and this is not the first application filed by the Petitioner and he has been seriously causing disturbance to the functioning of the 5th Respondent school, which has been in existence for the past 35 years.

4. The 5th Respondent school originally opened its nursery and primary section in the year 1990, thereafter the Directorate of School Education in the year 1998-99 permitted opening of classes from the 1st Standard to the 7th Standard. Thereafter during the years starting from 1999-2000 permission was granted to start classes from the 8th Standard to the 10th Standard and then in 2014 the school was granted permission to be designated as a Matriculation Higher Secondary School pursuant to which classes 11 and 12 were started. The school is presently functioning with 3026 pupils as against the sanctioned strength of 3900 pupils.

4. The school compound wall has been constructed in such a manner that starting from Ekambaranathar Sannithi Street a setback space of around 6-7 feet has been left, but then the house of the Petitioner did not leave any such space and it will start immediately from the periphery of the Ekambaranathar Sannithi Street. From the year 2002, the Petitioner started creating trouble for the institution. He wanted to install a gate facing the compound of the school that too which will give him an entry into the patta land of the school, the same was objected to and so he wanted to wreak vengeance.

5. The Petitioner was originally a Tamilnadu Government sector staff and it is understood he has retired sometime during the year 2019, but then it is not understood as to how he has enrolled himself as

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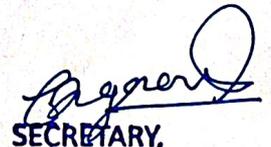


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a lawyer with the Bar Council of Tamil Nadu in the year 2011, that too when he was in full time employment. The Petitioner who is a trouble maker has no regards for the Respondent institution or the students who are studying in the institution. As he was prevented from installing a door/gate which will permit him to walk through the patta land of the Respondent institution, he has resolved himself to disturb and always cause trouble. He used to send bald and baseless petitions with allegations as against the institution and its management to various statutory authorities and cause them to make regular inspections as against the institution, though the institution has been clearly maintaining the standards prescribed by the statutory authorities. As all his attempts failed, he is now before this Honourable Tribunal, with vexatious claims as against the institution.

6. The Petitioner who was periodically indulging in harassing the school management and the trust management, again started a more active trouble in the year 2020, when a gate was being installed by the school on its compound wall which was facing the Sannathi Street. The said gate became a necessity considering various factors for the welfare and benefit of the students. The gate was also a necessity at times of use during an emergent eventuality. To prevent this installation of gate, the Petitioner filed a complaint with the Inspector of Police, Sivakanchi Police Station, but after enquiries it was found that the complaint was absolutely false and the Respondent institution continued and installed the safety gate. Thereafter the Petitioner files a suit as against Mr. Chandran @ Chatroopanandasamy in OS 32 of 2020 before the District Munsif Court at Kancheepuram. The suit was decreed with an order of permanent injunction being granted exparte for the Petitioner to enjoy his property without any disturbance from the defendant in the

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suit. The said suit was again an act of waste as against the Respondent institution by the Petitioner without any element of truth in it.

7. The Petitioner then claiming himself to be the President of Kanchinagara Tax Payers Association on the 20th of January 2024, lodges a complaint before Police higher officials as against the Respondent institution, pursuant to which enquiries were conducted by the B1, Sivakanchi Police. The enquiries revealed that the complaint of the Petitioner was futile, with no element of truth in it.

8. Thereafter the Petitioner lodges a baseless complaint as against the institution on the 08th of April 2024 with completely false allegations and impunities through the Chief Ministers Cell. To this complaint enquiries were also duly conducted by the District Education Officer and the same was also duly defended and disproved by the Respondent institution. This Respondent institution has also given replies to the District Education Officer, to the District Fire Officer. Though these replies along with the proceedings of the concerned statutory authorities were communicated to the Petitioner, he was not satisfied and instead he writes a letter on the 18th of June 2024 containing blank accusations and use of unsavoury language as against the Respondent institution and its officials in the board and also as against statutory authorities. His impunities also include allegations of graft as against statutory authorities.

9. As a continuation of the tirade as against the Respondent institution, the present complaint has been lodged before this Honourable Tribunal, which has no cause. The filing of the memorandum before this Honourable Tribunal is nothing but an abuse of process. The Petitioner

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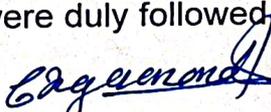


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is taking advantage of the badge around his neck (advocate) and is critically using it with utter disregard for law. The only motive of the Petitioner is to close down the Respondent institution which is successfully running with 100% pass percentage and without any blemish in its activities. For the said purpose the Petitioner has embarked on this untiring journey of abuse and slander. His motives should never be allowed to succeed and it is a very fit case for this Honourable Tribunal to impose punitive costs on the Petitioner to the tune of Rs.1 Crore.

10. Now coming to the allegations as found in the memorandum/application it is hereby replied as follows:

- a) There is no noise pollution as is being alleged and the use of speakers and its volume are within permitted decibel levels.
- b) There is no disturbance to any other resident in Ekambaranathar Sannithi Street, except for the Petitioner. The allegation that the school is functioning in an area of 6000 sq.ft is completely false. The school is actually functioning in an area of 23693 sq.ft as against the prescribes norms of 19202 sq.ft.
- c) The activities of the Respondent institution have never disturbed the peace of the locality or the surrounding areas. The school operates only 7 active buses and the same are parked at the space available in the Sree Narayana Sevashramam premises at No. 1 Narasingarayar street, kancheepuram which is just 400 meters away. The traffic management and parking of vehicles are always organized with no disturbance to any person using the street or the locality.
- d) There is no violation of Environment (Protection) Act or its related rules and regulations.
- e) No hazardous activities were carried out or conducted during lockdown period and all the restrictions as imposed were duly followed.



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- f) The cause of ill health to the Petitioner has no connection with the activities of the Respondent Institution and there is no noise pollution as is being alleged.
- g) The waste generated from the Respondent Institution is being disposed as per standard operating procedures and there is no environmental hazard or pollution being caused.
- h) There are sufficient rest rooms for the children of the school and the staff of the school and there is proper drainage disposal system.
- i) The sanctioned strength of the children to be accommodated in the school is much more than the present strength of children and hence the allegation of dumping or shoving students in class rooms is only a myth.
- j) The structural stability of the institution is certified. The Fire prevention facilities installed in the Respondent institution are also in order. There is requisite No-Objection Certificate from the fire department.
- k) There is also sanction for conducting classes for the Respondent institution approved by the Chief Education Officer at Kancheepuram.
- l) The City Health Officer of Kancheepuram Corporation has certified the building, its accommodation and also the sanitary facilities available in the institution.
- m) There is no pollution to Air, Water and there is no improper disposal of solid waste and sanitary waste.
- n) There is also no violation of Bio-Medical waste management by the institution.

In the circumstances, the petition in OA 89 of 2025 only has to be dismissed with punitive costs of Rs.1 Crore being imposed on the Petitioner and thus render justice.

Dated at Kancheepuram on this 06th day of August 2025.



Counsel for Respondent 5 & 6



For Respondent 5 & 6

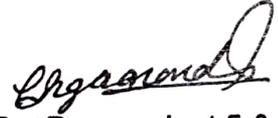
SECRETARY,
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VERIFICATION

I, Mr. Swami Yogananda Theertha, son of Mr. K. K. Vasu, Secretary of Sri Narayanaguru Matriculation School 5th Respondent and also on behalf of the 6th Respondent, having address at Number 21/1, Ekambaranathar Koil Sannathi Street, Kancheepuram, 631502 do hereby verify and declare that the statements contained in paragraphs 1 to 10 above are true to the best of my knowledge and belief.

Verified at Kancheepuram on this 06th day of August 2025

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For Respondent 5 & 6

SECRETARY,
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And 6 others

...Respondents

COMMON REPLY STATEMENT FILED BY THE RESPONDENTS 5 & 6

**M/s. Ganesh & Ganesh
(ROC 60050/2017)
Counsel for Respondents 5 & 6
Mobile No. 99529 68593
advhemkumar1@gmail.com**