

**BEFORE THE NATIONAL GREEN TRIBUNAL  
MEMORANDUM OF APPLICATION**

(Under Section 18(1) read with Sections 14, 15 r/w Section 26, 28 of National  
Green Tribunal Act 2010)

Original Application No. 136 of 2024

K.Saravanan

... Applicant

Vs

The Commissioner & Anr.

... Respondents

**INDEX**

<b>SI No.</b>	<b>Description</b>	<b>P No.</b>
1	Affidavit	01-02
2	<b>Annexure A1-</b> Satellite imageries and photos Thenpattinam – of the coastline before and after the Groynes	03-05
3	<b>Annexure A2 -</b> Satellite imageries and Photos of Vadapattinam – of the coastline before and after the Groynes	06-12
4	<b>Annexure A3 -</b> Satellite imageries and Photos of Kadalur – of the coastline before and after the Groynes	13-16
5	<b>Annexure A4-</b> Satellite imageries and Photos of Pudupattinam – of the coastline before and after the Groynes	17-26
6	<b>Annexure A5 -</b> Satellite imageries and Photos of Nemelikuppam – of the coastline before and after the Groynes	27-40
7	<b>Annexure A6 -</b> Satellite imageries and Photos of Semmancheri – of the coastline before and after the Groynes	41-51
9	<b>Annexure A7 -</b> Satellite imageries and Photos of Karikatukuppam – of the coastline before and after the Groynes	52-69

**//Certified to be true copies//**

  
(1921/2011)

**A.Yogeshwaran  
Advocate**

**BEFORE THE NATIONAL GREEN TRIBUNAL  
MEMORANDUM OF APPLICATION**

(Under Section 18(1) read with Sections 14, 15 r/w Section 26, 28 of National Green Tribunal Act 2010)

Original Application No. 136 of 2024

K.Saravanan

... Applicant

Vs

1. The Commissioner of Fisheries and Fishermen Welfare  
Department of Fisheries and Fishermen welfare,  
Government of Tamilnadu  
3rd Floor, Integrated Animal Husbandry and Fisheries Building,  
Nandanam, Chennai - 600 035  
Ph No: 044 – 29510390, Email : [tnfisheries@nic.in](mailto:tnfisheries@nic.in)

2.The Tamilnadu Coastal Zone Management Authority  
Rep by its Member Secretary  
No.1, Jeenis Road, Panagal Building,  
Ground Floor, Saidapet, Chennai-600 015  
Email : [tndoe@tn.nic.in](mailto:tndoe@tn.nic.in), Phone : 044 - 24336594

.. Respondents

**AFFIDVAIT FILED BY K.SARAVANAN**

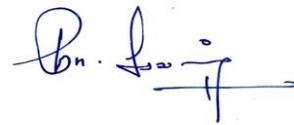
I, K.Saravanan, S/o Kasinathan, aged about 37 years, residing at No. 30, UrurKuppam, Besant Nagar, Chennai – 90, solemnly affirm and sincerely state as follows:

1. The present OA concerns the illegal Groyne fields built by the 1<sup>st</sup> respondent department in contempt of the orders of this Hon'ble Tribunal in OA. No. 4 of 2013 dated 11.04.2022 and without clearance under the CRZ Notification,2011.
2. The 2<sup>nd</sup> respondent TNSCZMA has filed a report dated 29.05.2024 stating at page 7 that no clearance or recommendation has been issued by them under the CRZ Notification,2011.
3. It is submitted that the groynes illegally constructed by the 1<sup>st</sup> respondent has caused severe erosion to the coastline and is seen even past

Muthukaadu and further south in Chennai. Littoral drift has been severely impacted due to the cumulative effect of all these hard structures. The coast is severely starved of sand. Construction of groyne is ongoing at Kadalur.

4. Satellite imagery of the coast before and after the construction of the subject groynes and photos and videos of the coast as on date will show the severity of the problem. It is to be noted that 30-50 meter wide beach has disappeared in most places. These are prime turtle nesting grounds and the destruction of the beach is destruction of sensitive habitat.
5. Since the beach is rapidly eroding, people who have illegally built bungalows on the coast are illegally dumping rocks on the beach in a bid to save their property, compounding the problem.
6. It is necessary to immediately remove
  - a. All the groynes constructed in Chengalpet district, listed by the TNSCZMA and the Groynes in Nemeli village.
  - b. Remove all the rocks dumped by private parties illegally to protect their illegal buildings without further delay.

It is prayed that this Hon'ble Tribunal be pleased to take note of these facts and allow the application as prayed for and thus render justice.



Solemnly affirmed and signed his name

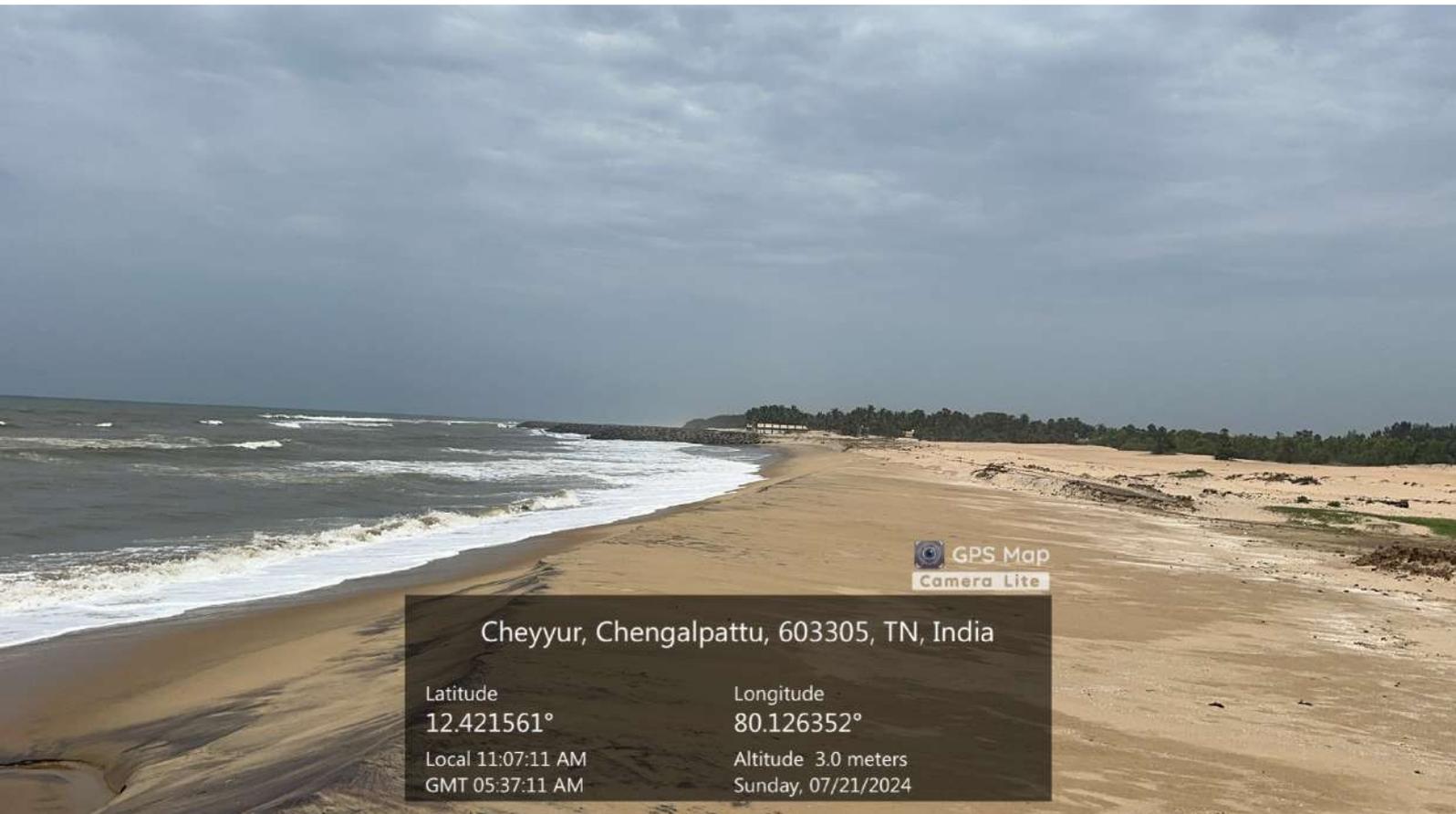
Before Me

Before me  
 Chitana V  
 No 18, Bindavan Street  
 Mylapore, Chennai

This the 22<sup>nd</sup> day of July, 2024 at  
 Chennai

ADVOCATE : CHENNAI

# ANNEXURE A1 - THENPATTINAM







GPS-Map  
Camera Lite

Cheyyur, Chengalpattu, 603305, TN, India

Latitude  
12.421554°

Local 11:08:10 AM  
GMT 05:38:10 AM

Longitude  
80.126330°

Altitude 6.5 meters  
Sunday, 07/21/2024

## ANNEXURE A2 - VADAPATTINAM



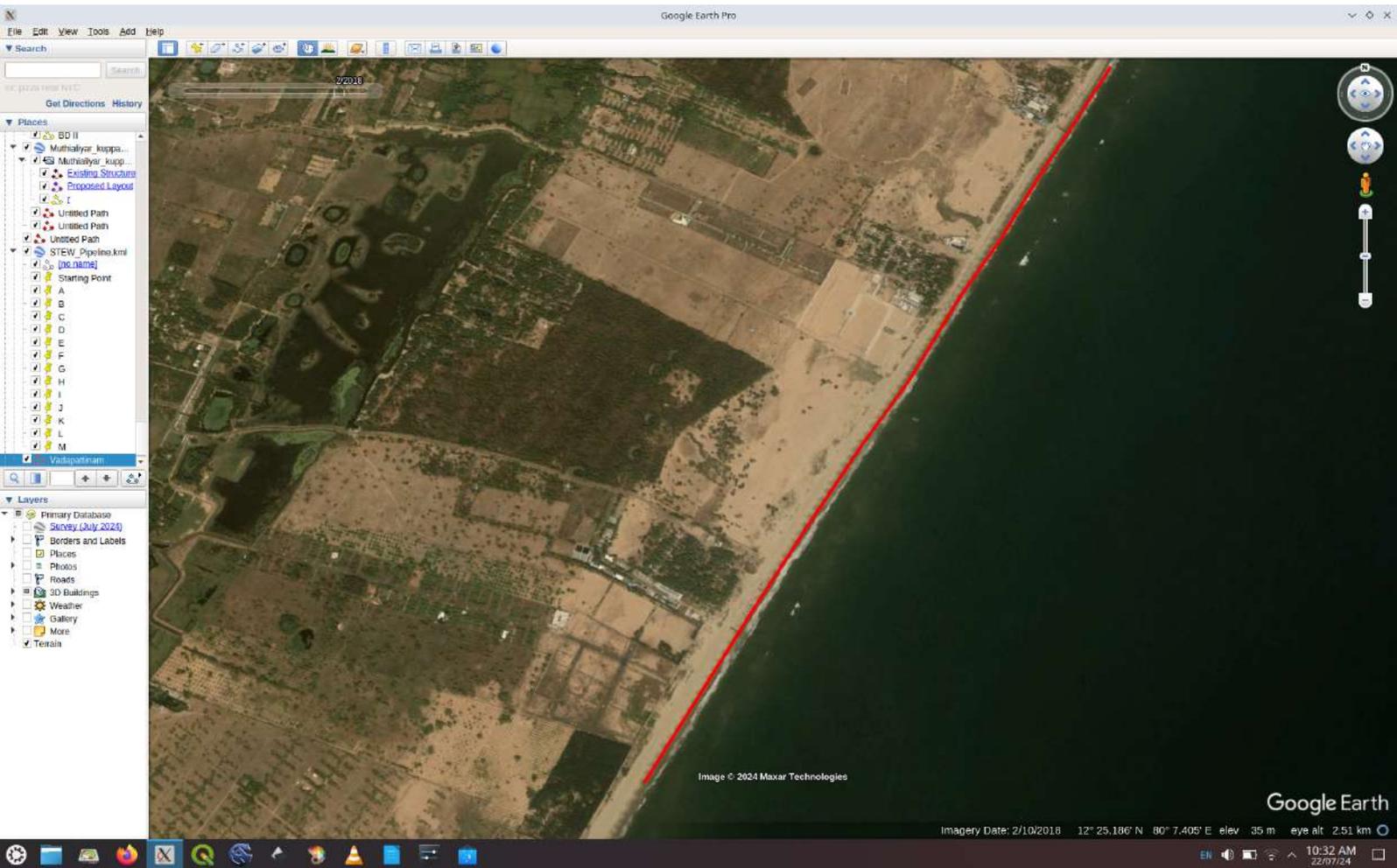




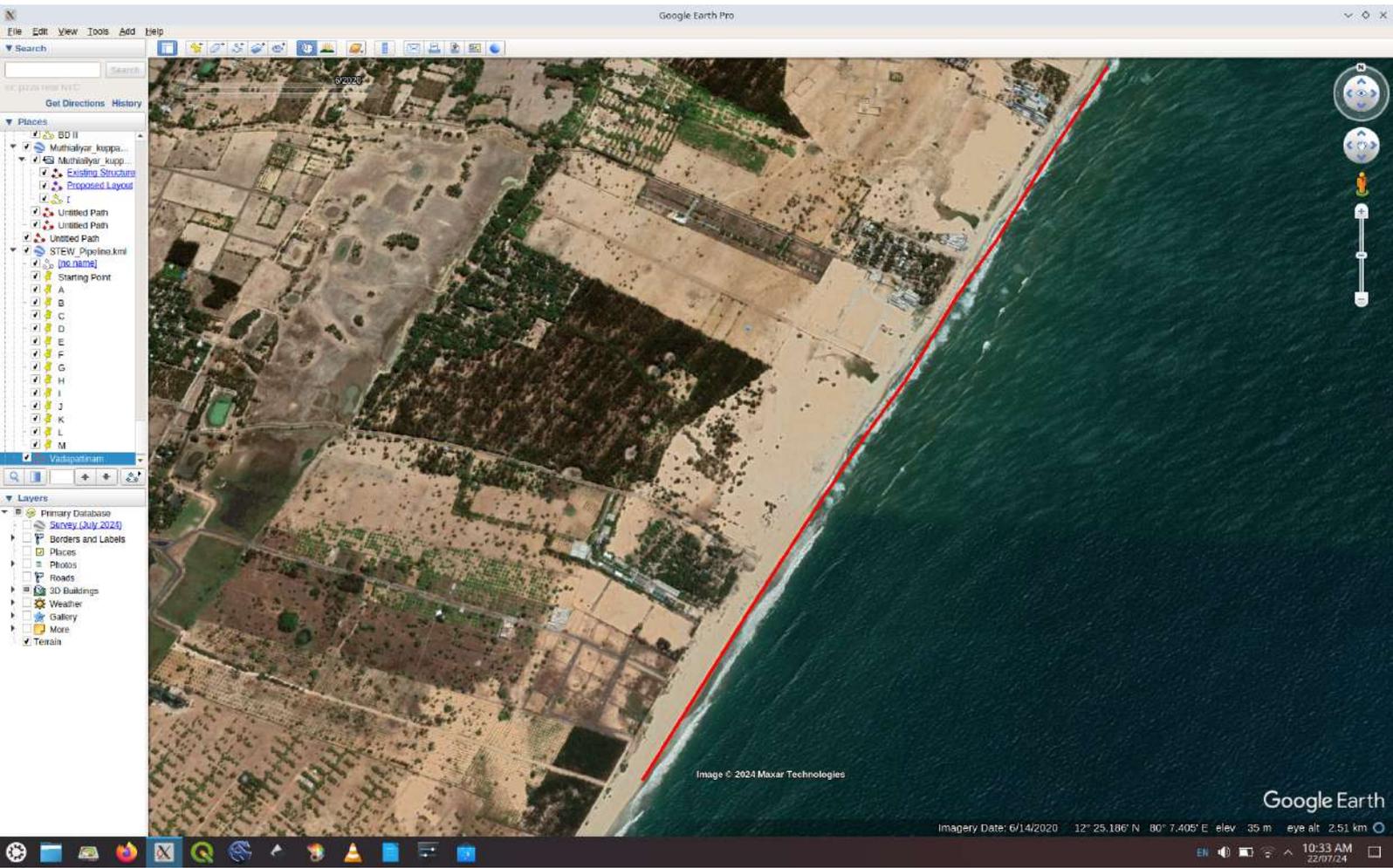


# GOOGLE EARTH IMAGERY OF THENPATTINAM AND VADAPATTINAM

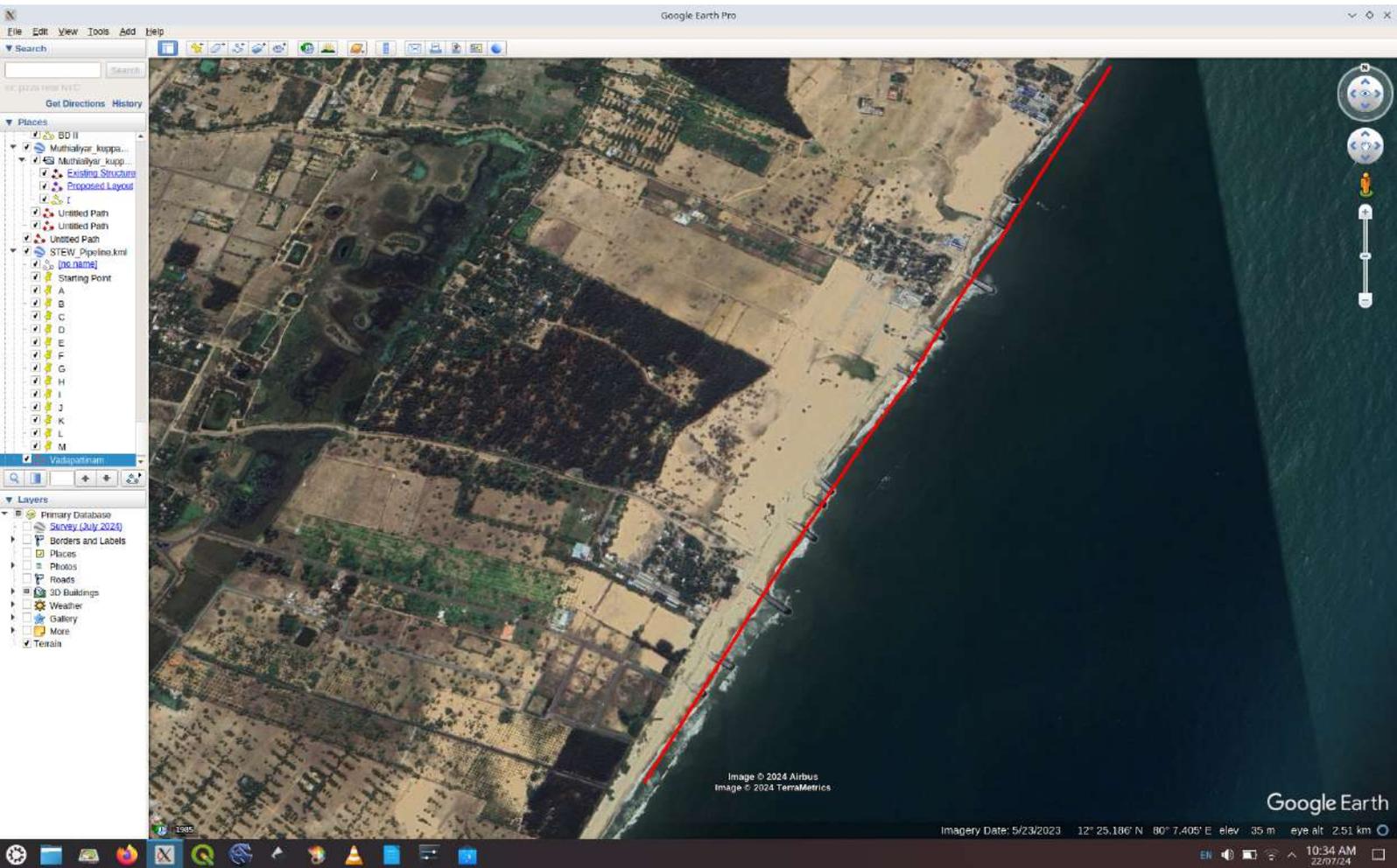
## YEAR - 2018



YEAR - 2020



YEAR - 2023



## ANNEXURE A3 - KADALUR





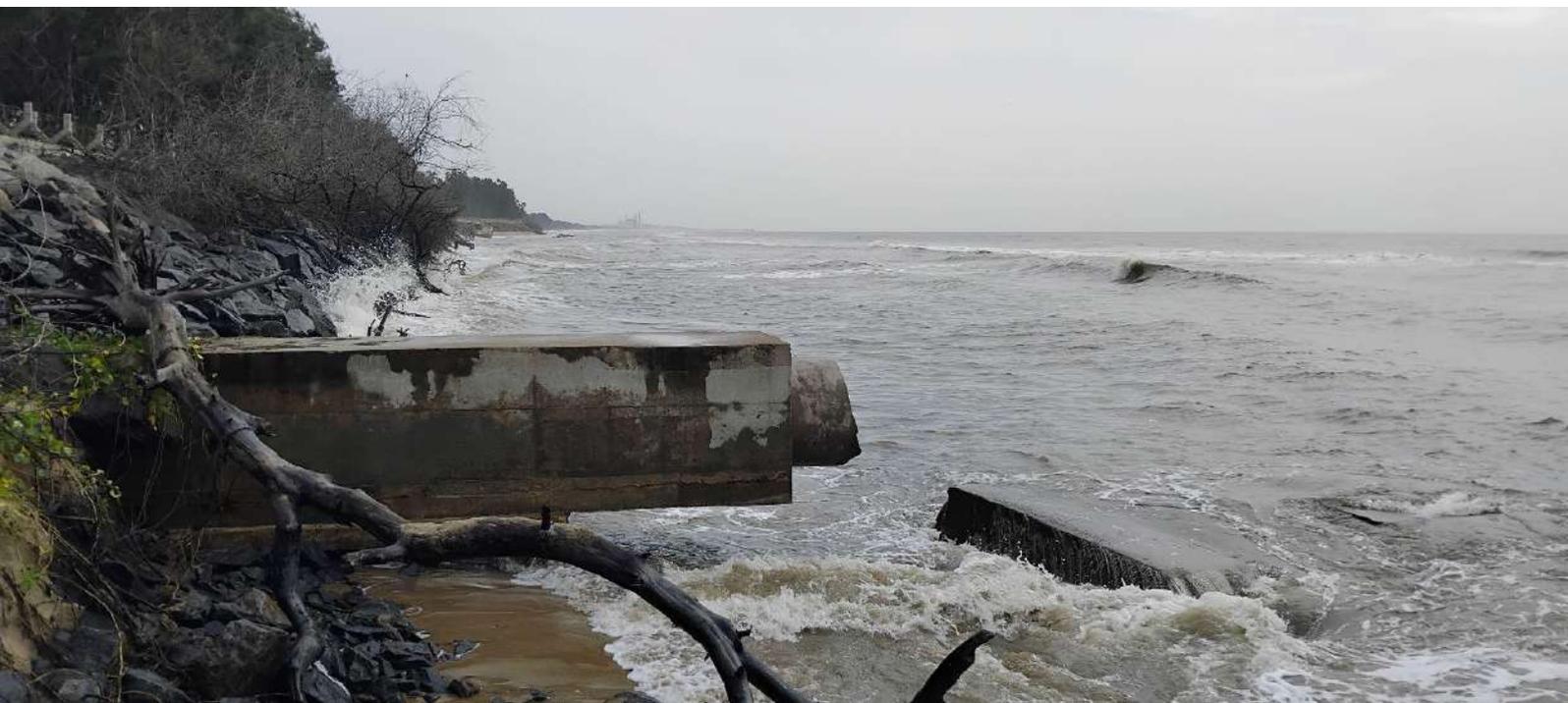




## ANNEXURE A4 - PUDUPATTINAM



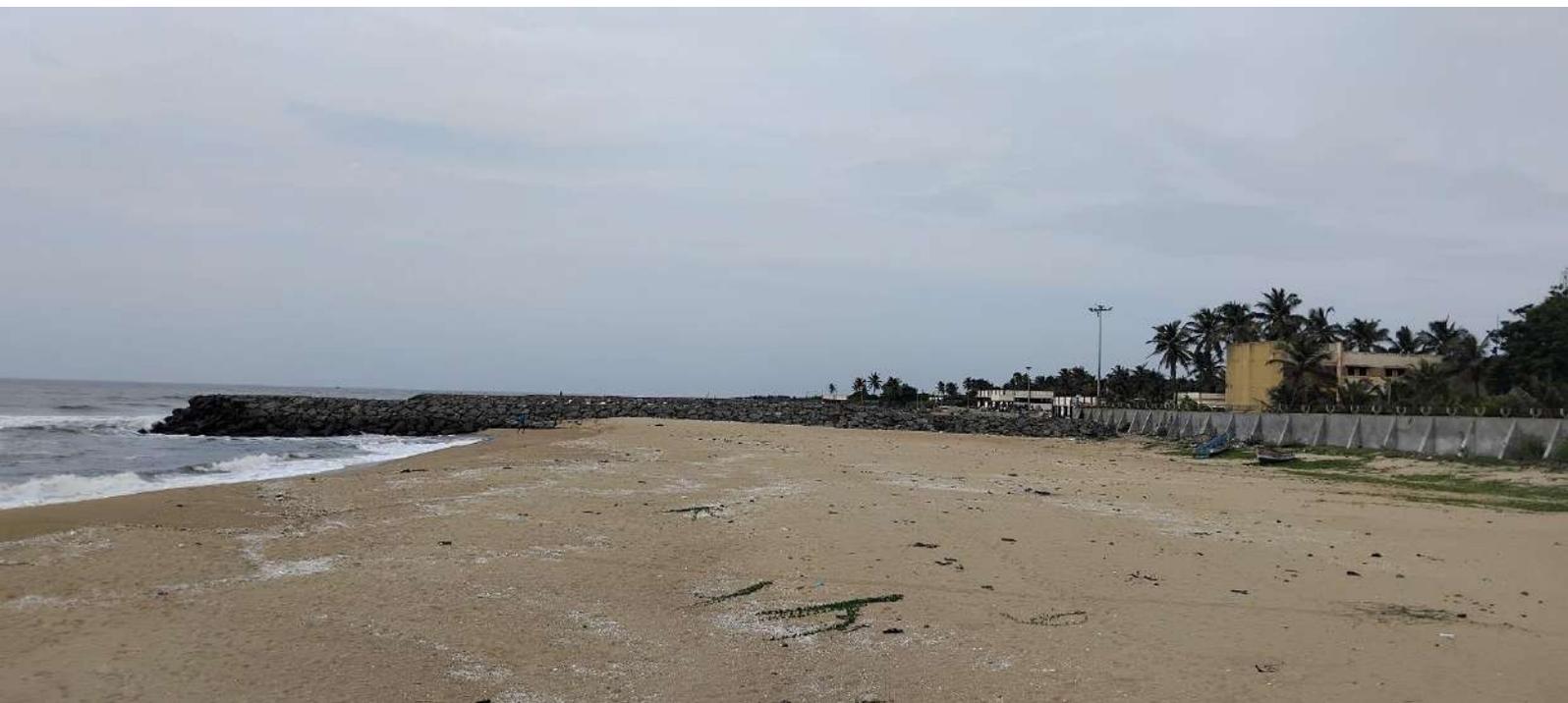




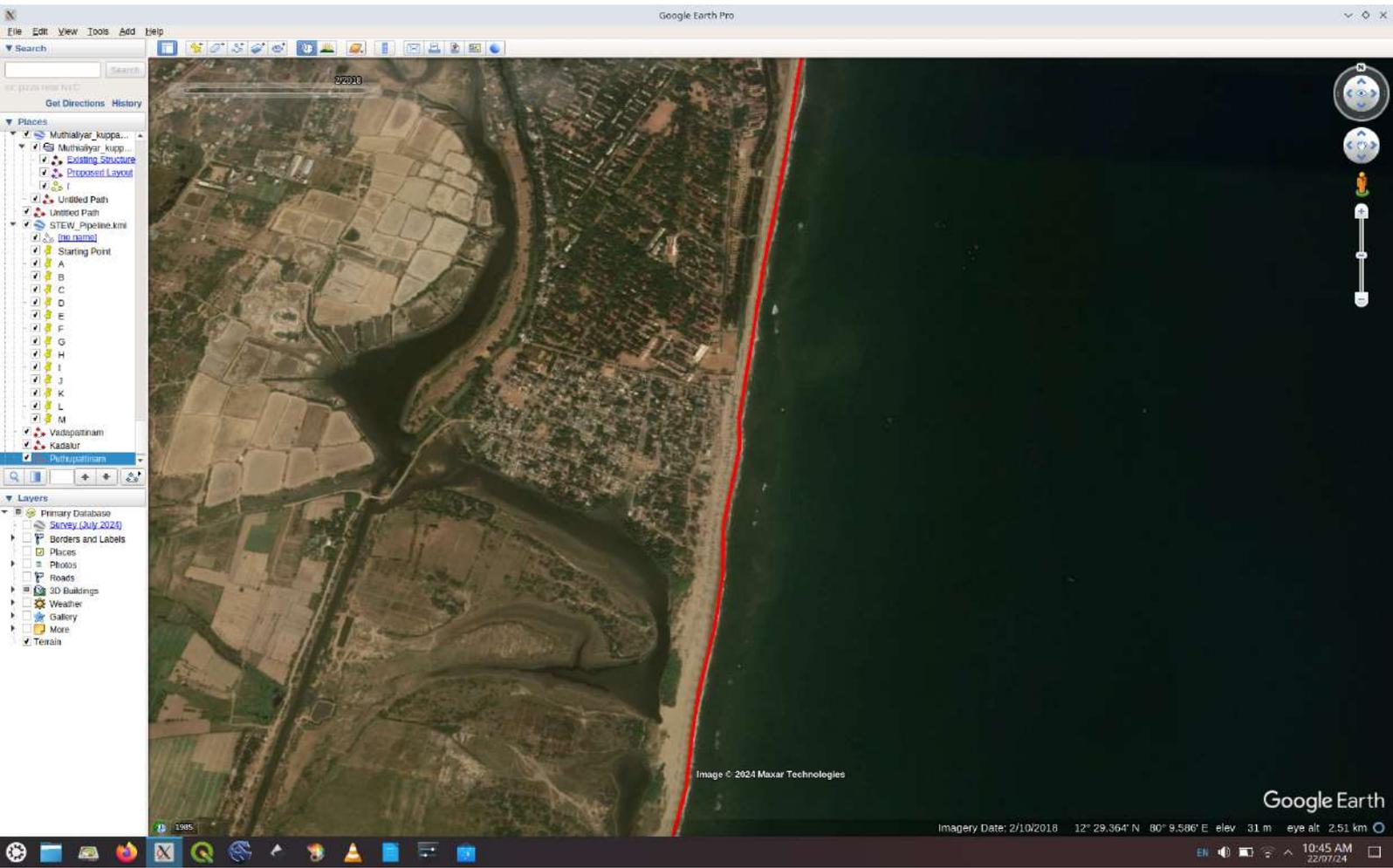




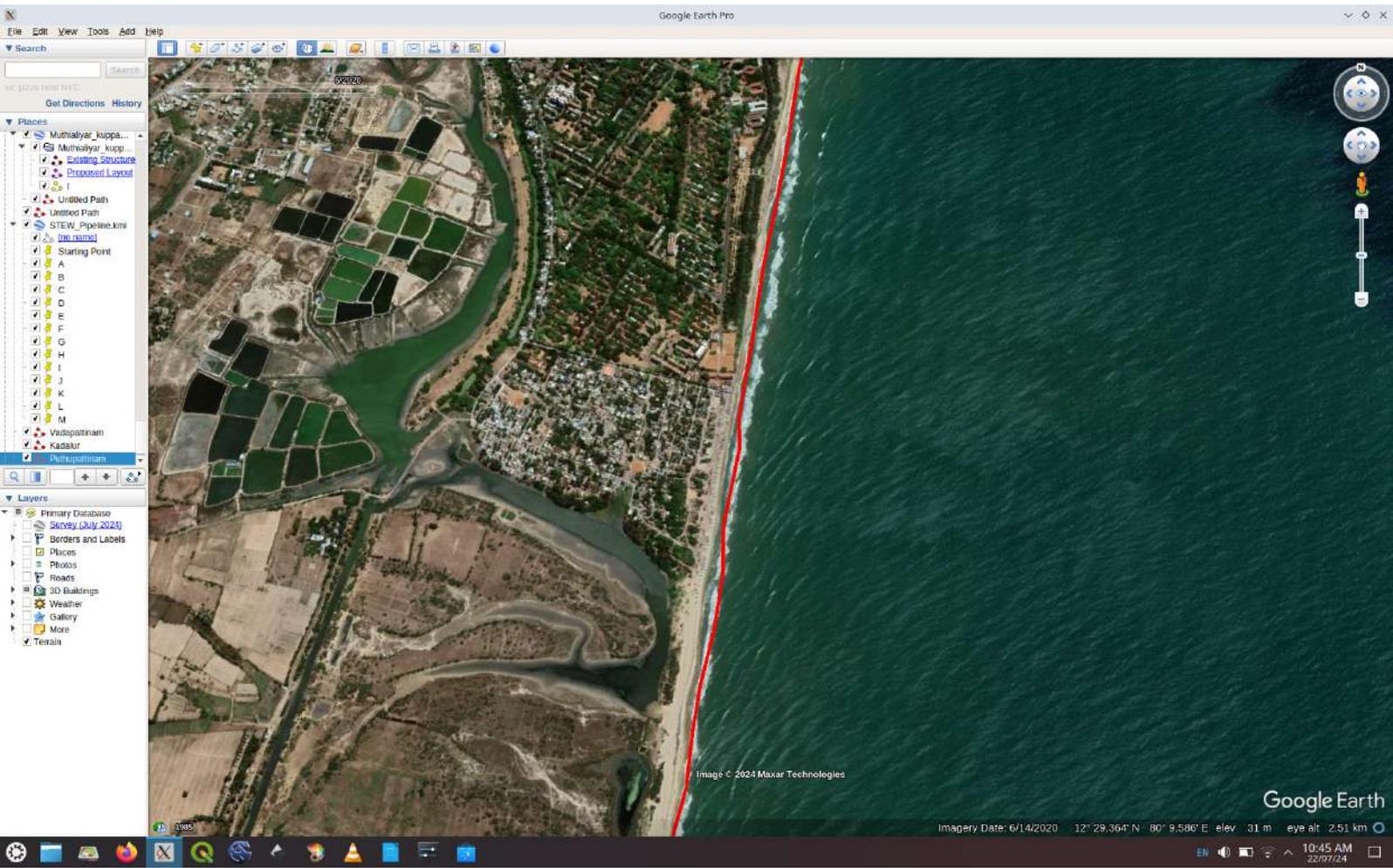




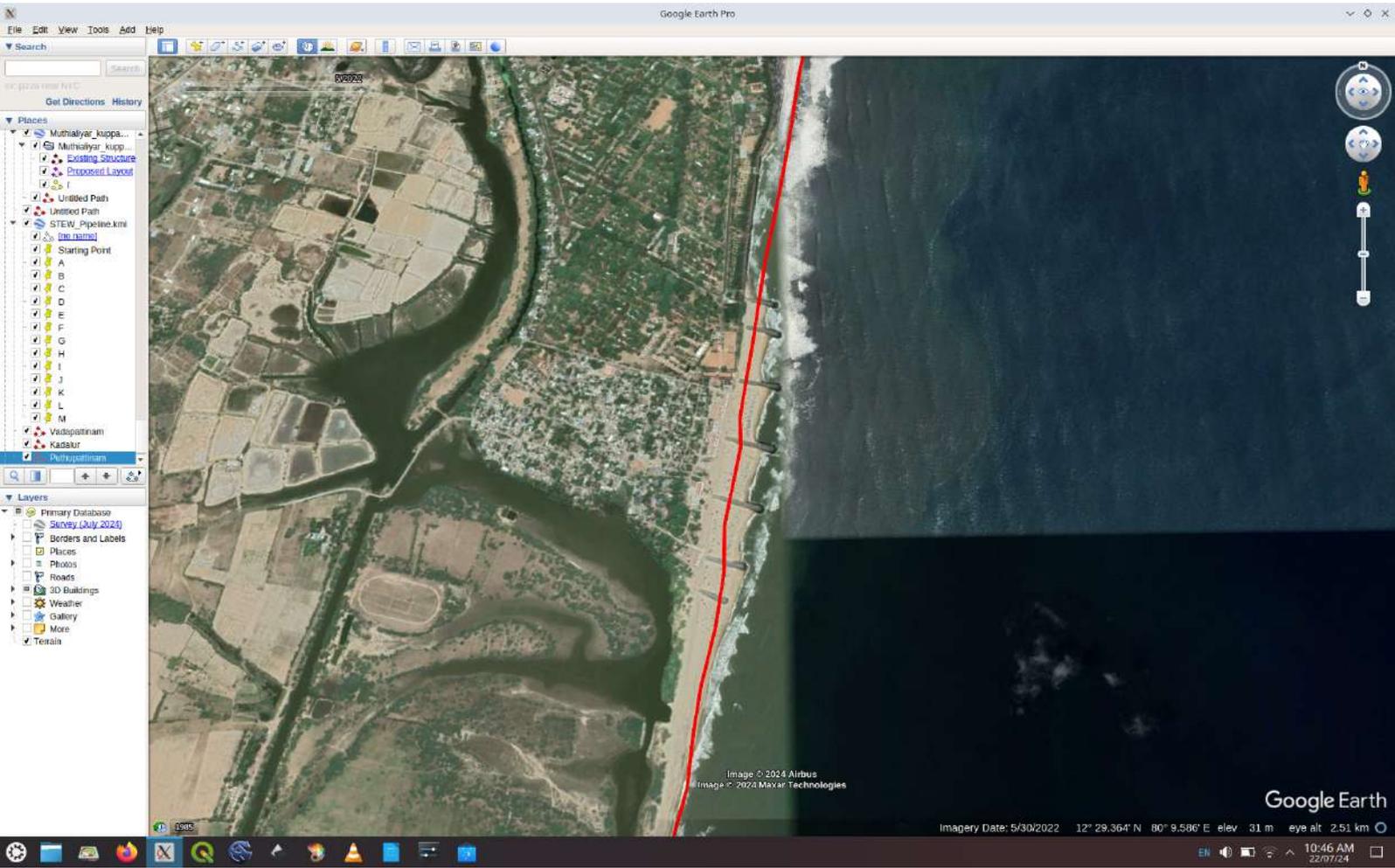
# YEAR - 2018



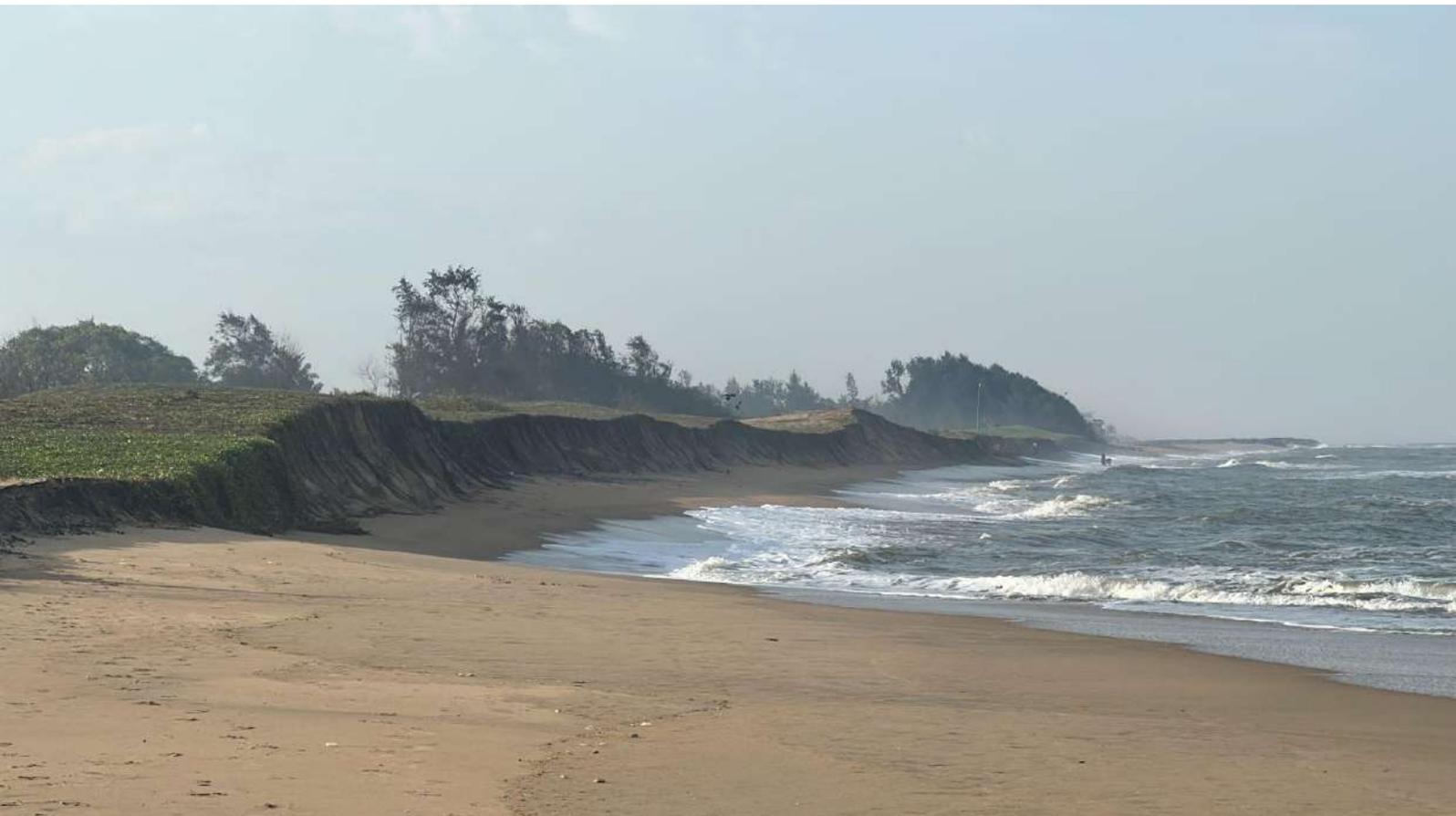
YEAR - 2020



# YEAR - 2022



## ANNEXURE A5 - NEMELI











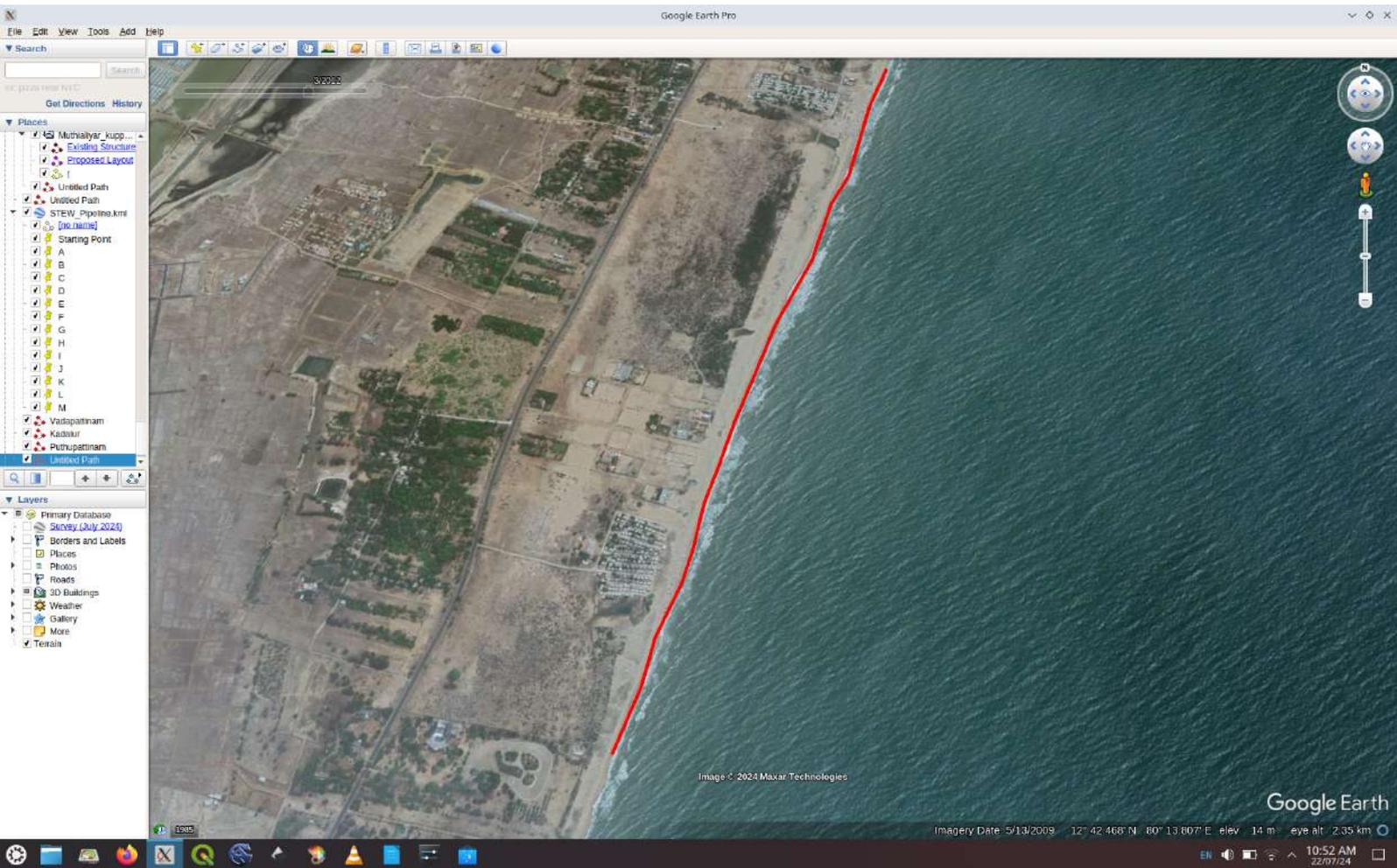




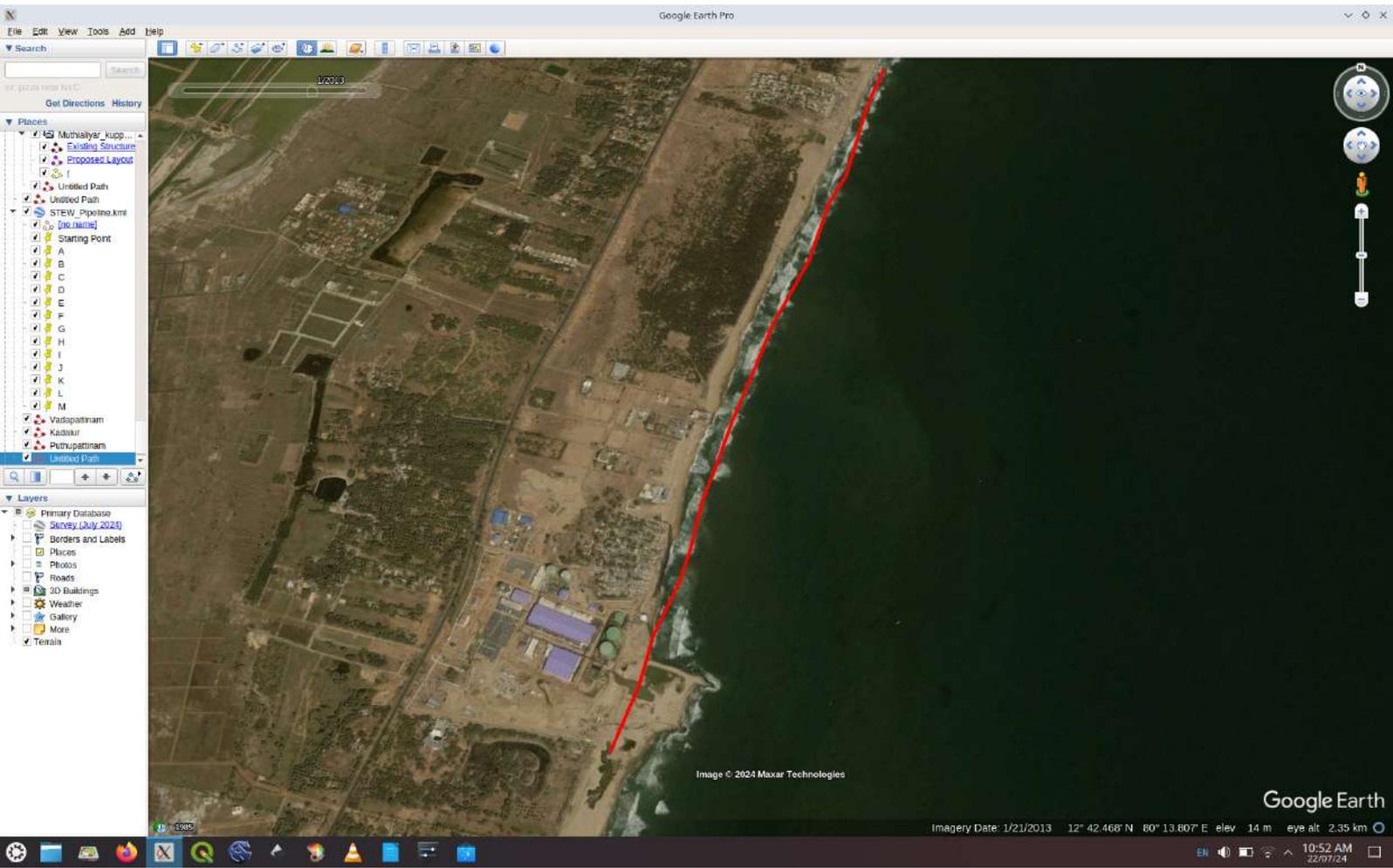




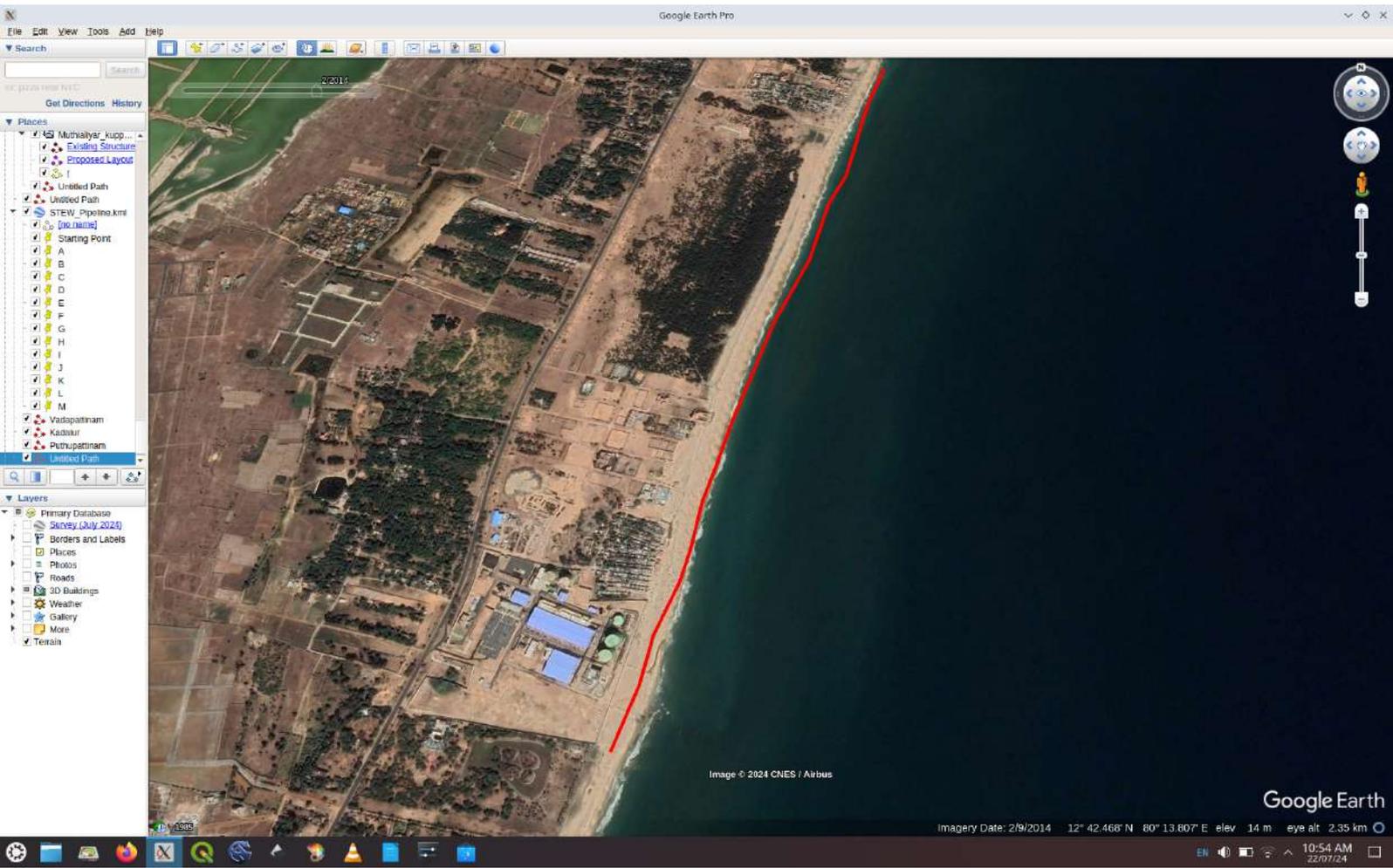
# YEAR - 2009



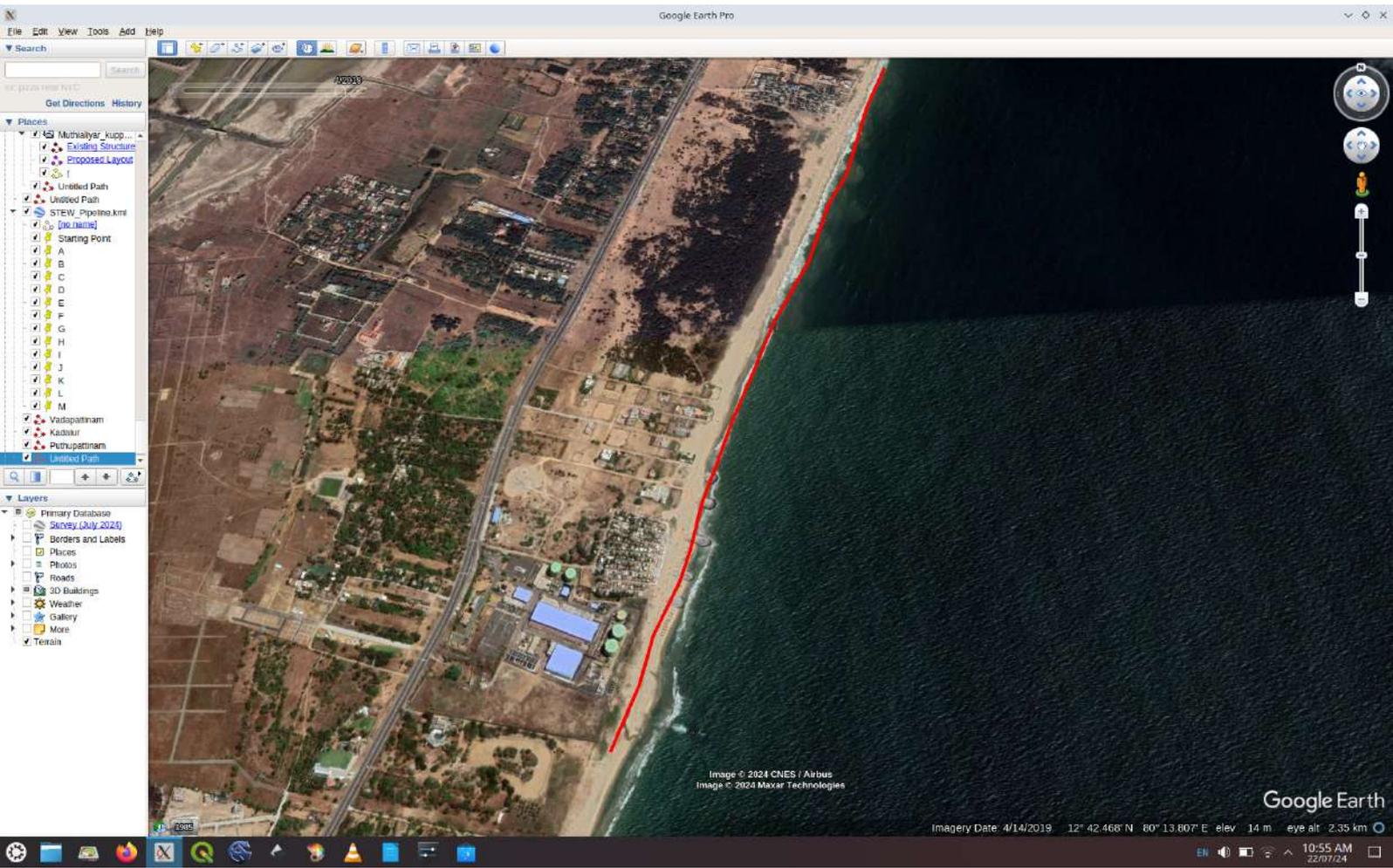
# YEAR - 2013



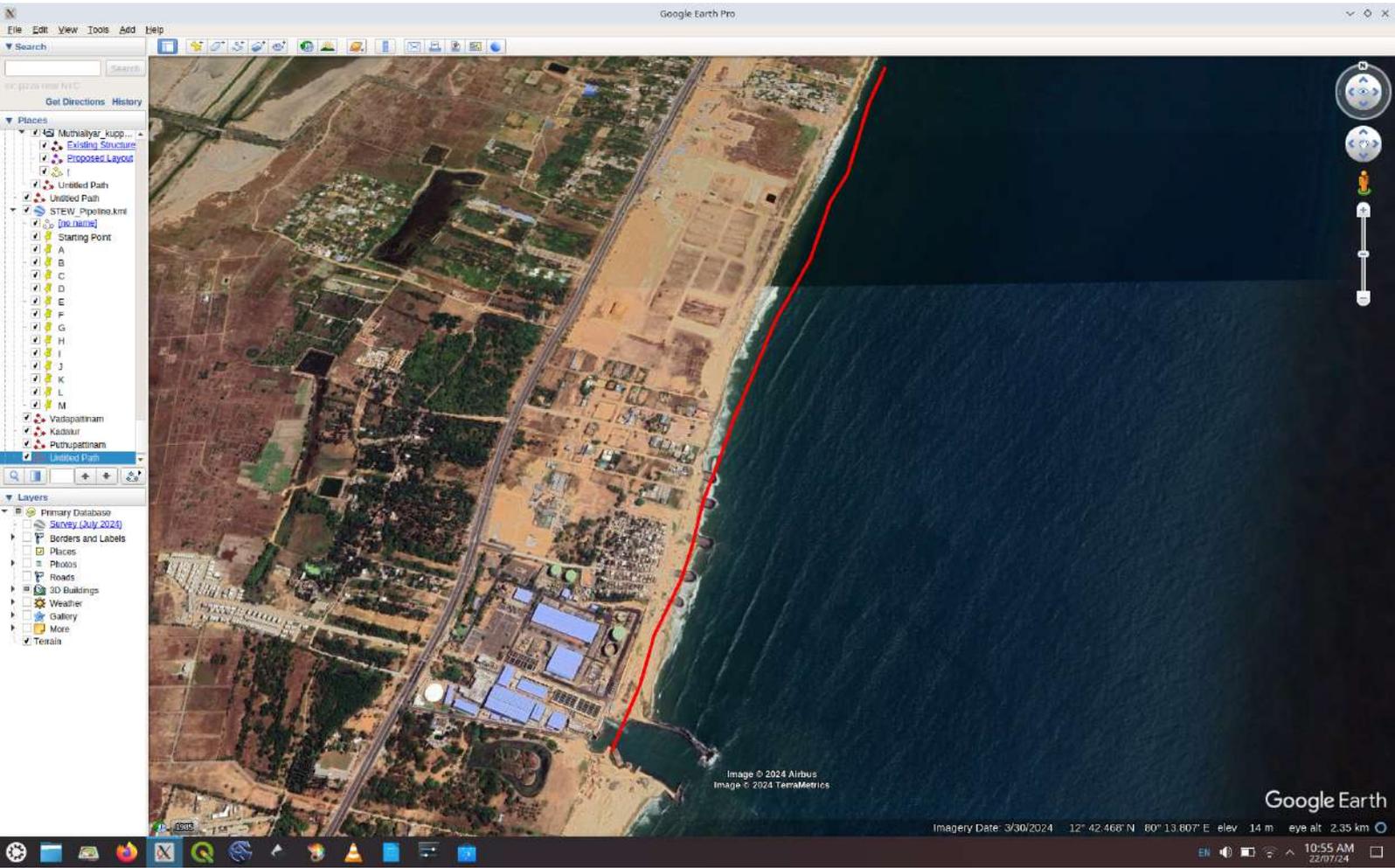
YEAR - 2014



YEAR - 2019



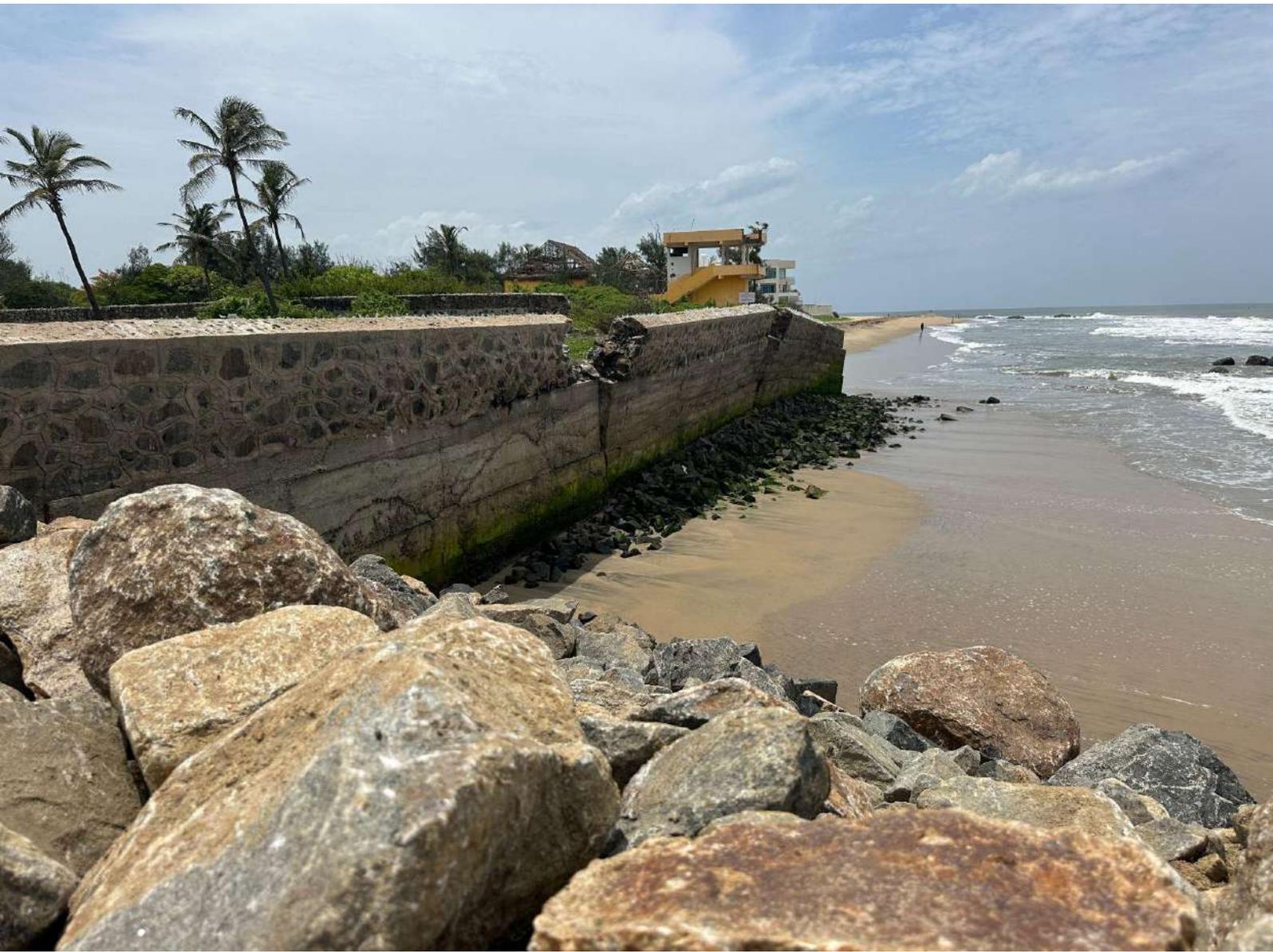
YEAR - 2024



## Annexure A6 - Semmancheri













GPS Map  
Camera Lite

Tiruporur, Kovalam, 603112, TN, India

Latitude  
12.780174°

Local 01:01:13 PM  
GMT 07:31:13 AM

Longitude  
80.254421°

Altitude 2.9 meters  
Sunday, 07/21/2024





Tiruporur, Kovalam, 603112, TN, India

Latitude  
12.778918°

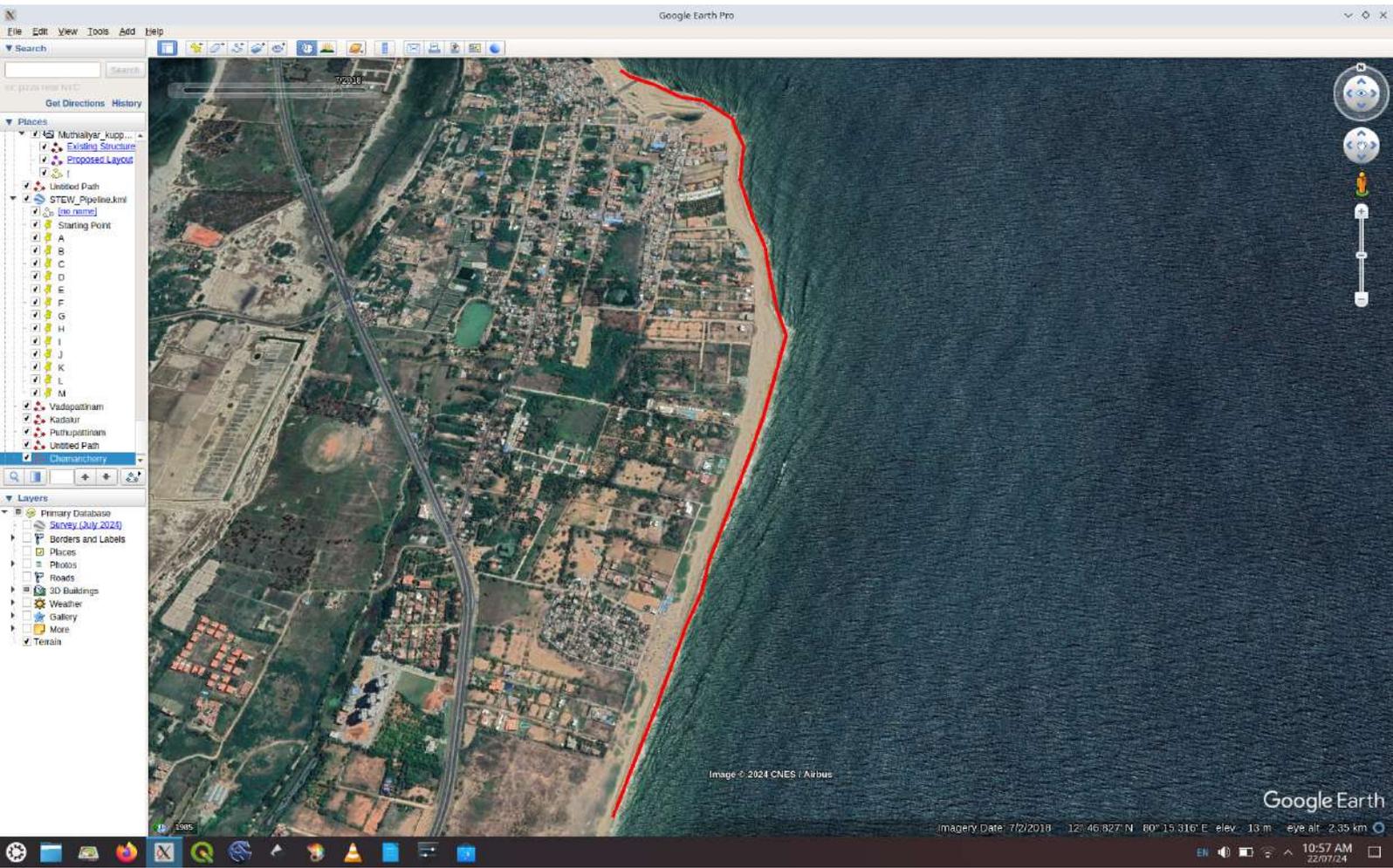
Longitude  
80.253940°

Local 01:09:20 PM  
GMT 07:39:20 AM

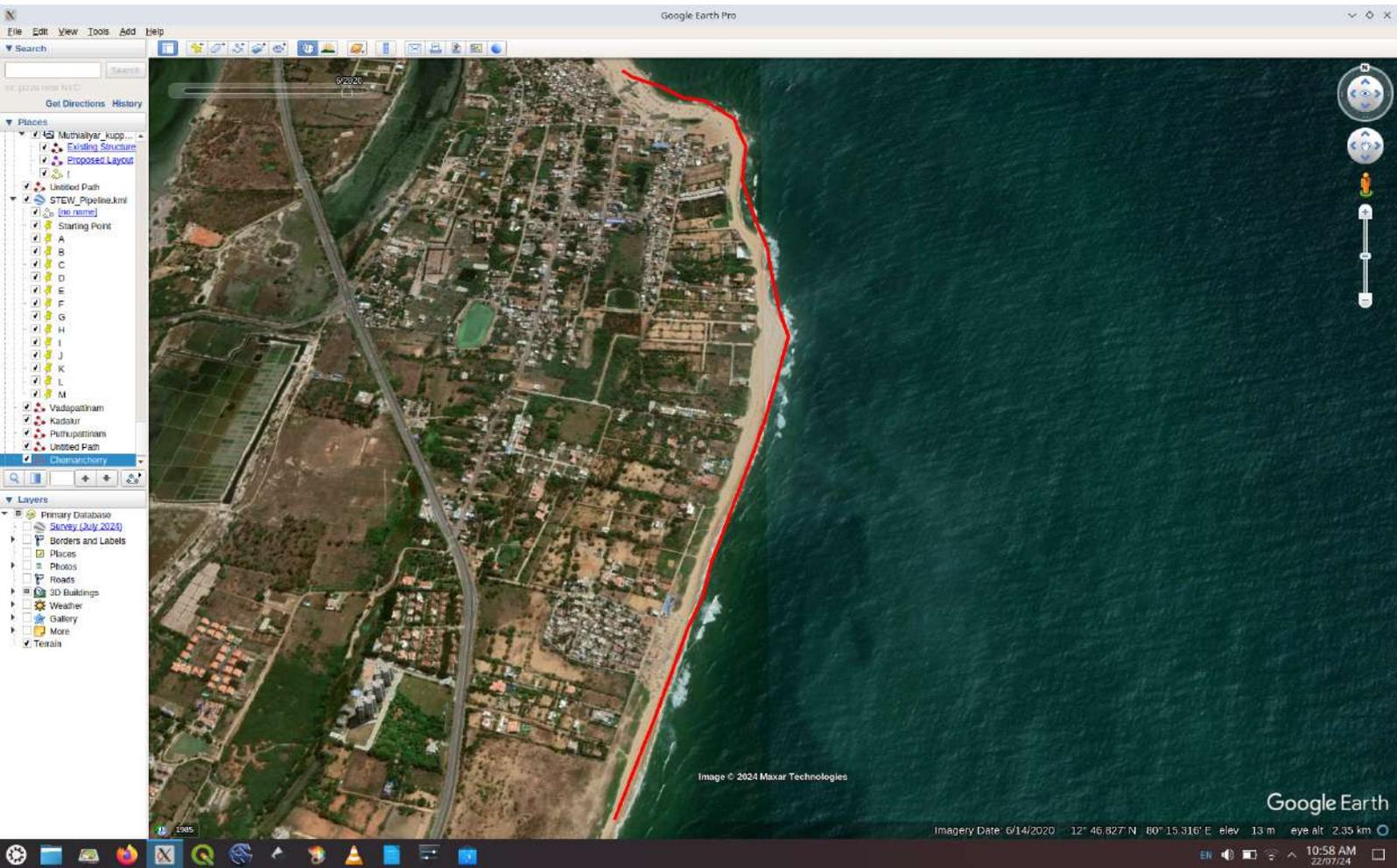
Altitude 2.5 meters  
Sunday, 07/21/2024

GPS Map  
Camera Lite

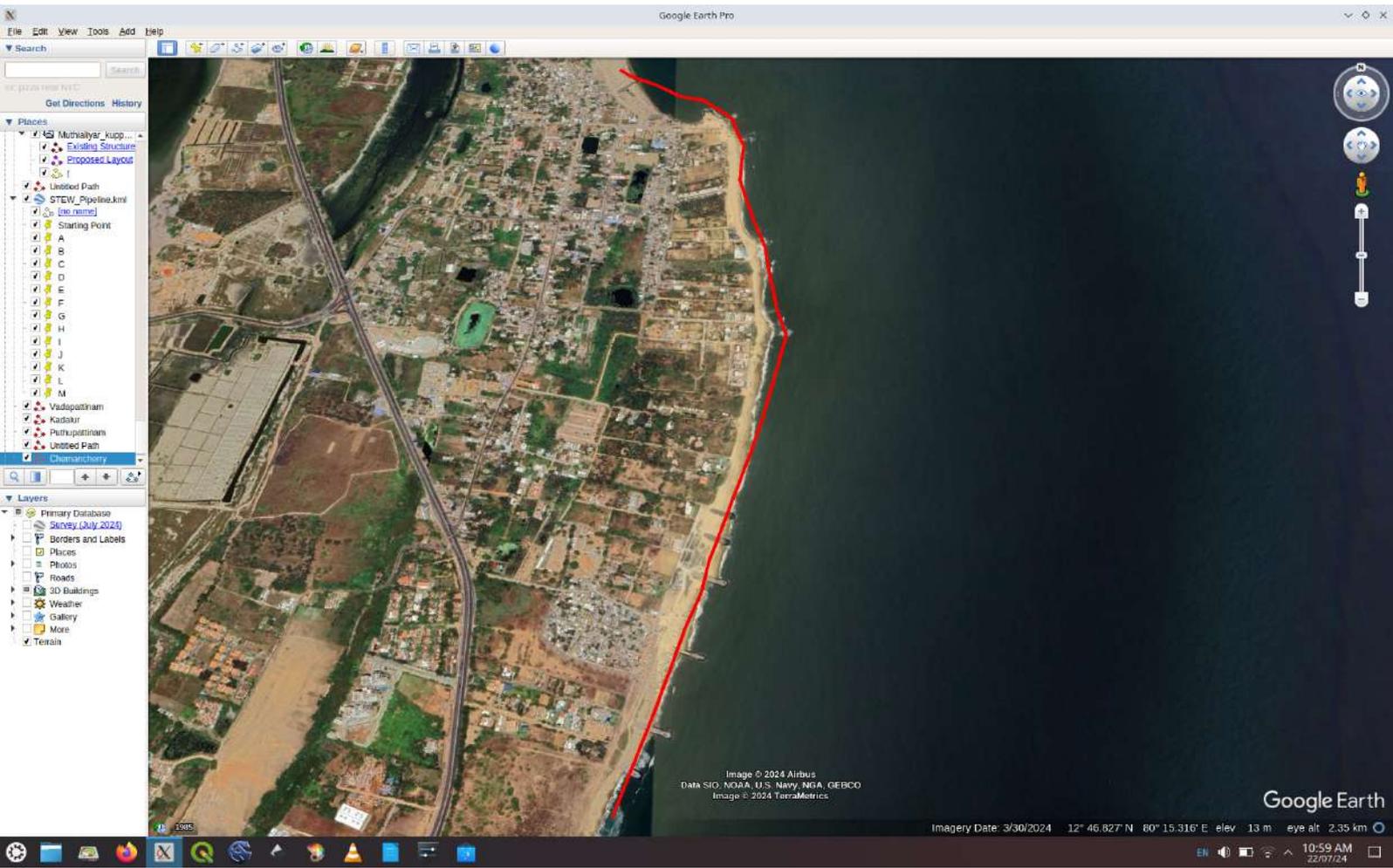
# YEAR - 2018



YEAR - 2020



# YEAR - 2024



## ANNEXURE A7 - KARIKATTUKUPAM

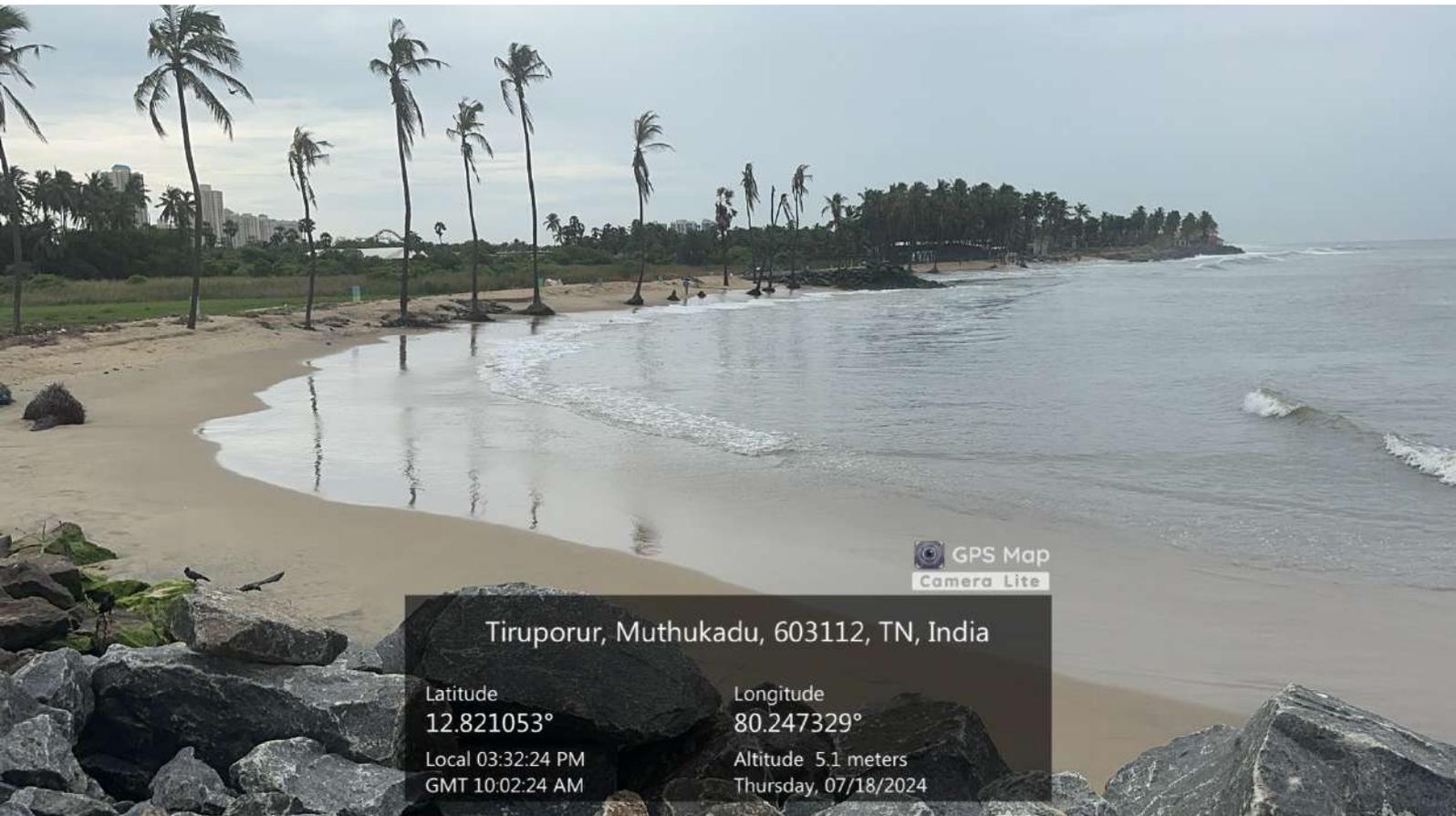












GPS Map  
Camera Lite

Tiruporur, Muthukadu, 603112, TN, India

Latitude  
12.821053°

Longitude  
80.247329°

Local 03:32:24 PM  
GMT 10:02:24 AM

Altitude 5.1 meters  
Thursday, 07/18/2024









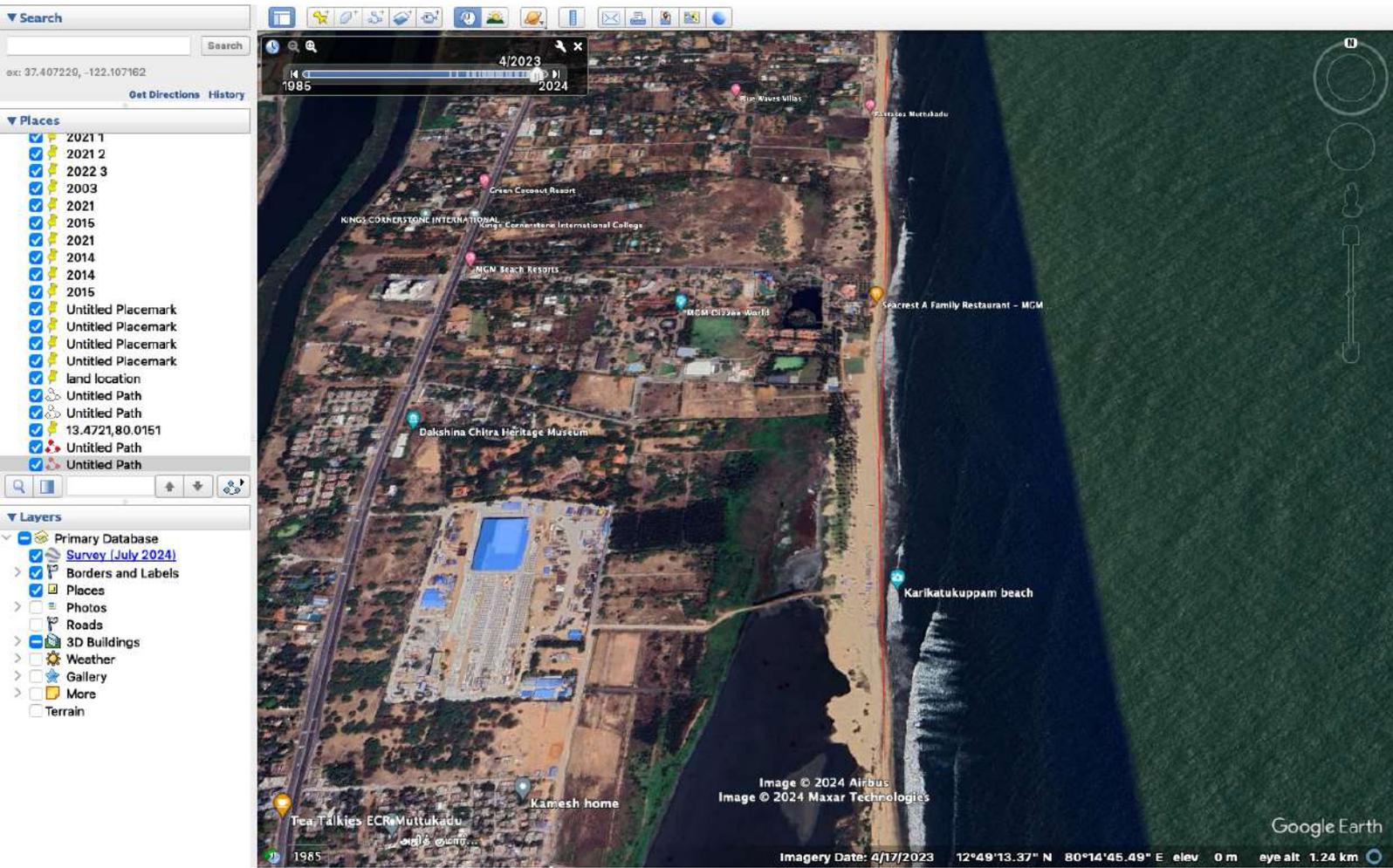




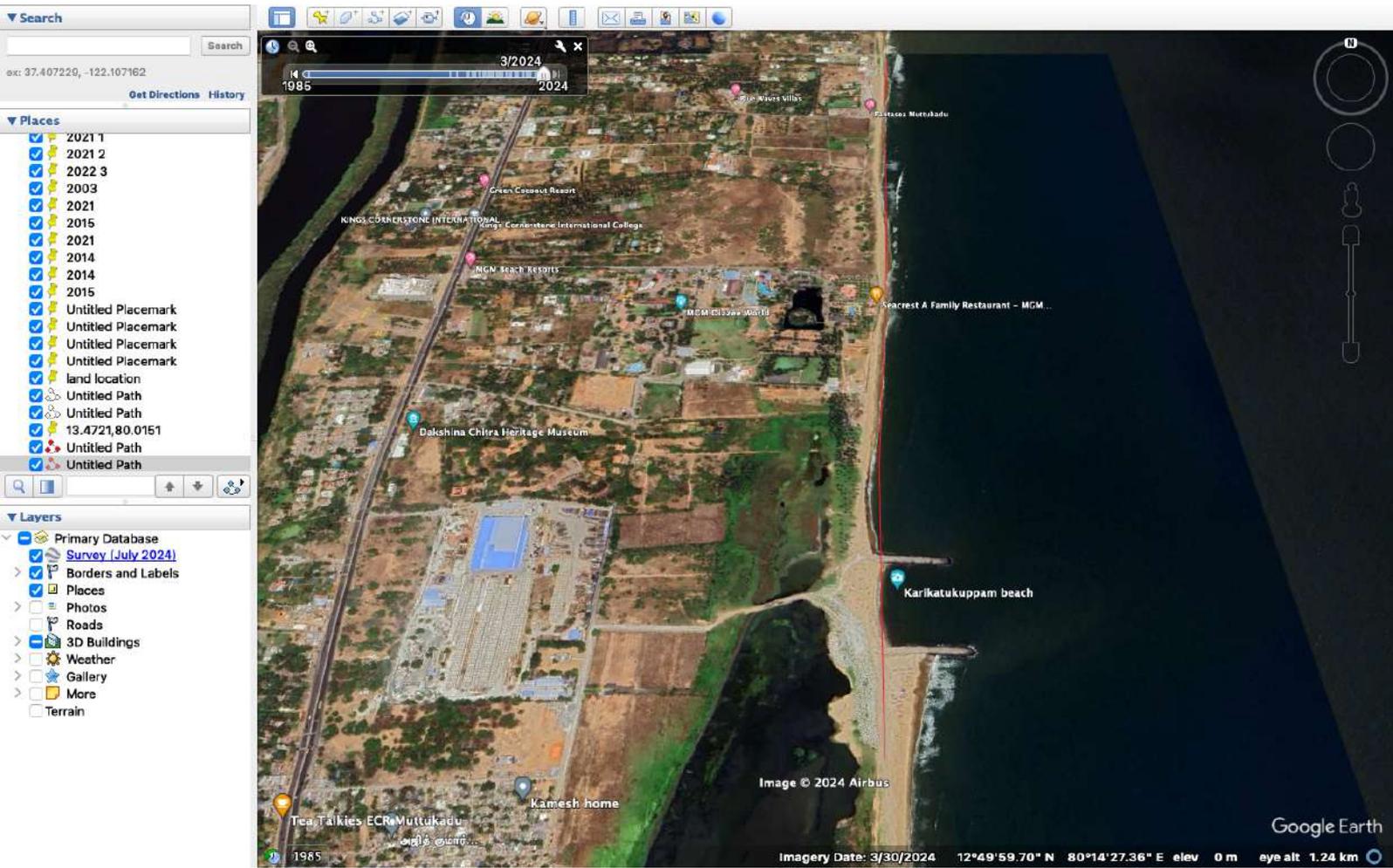




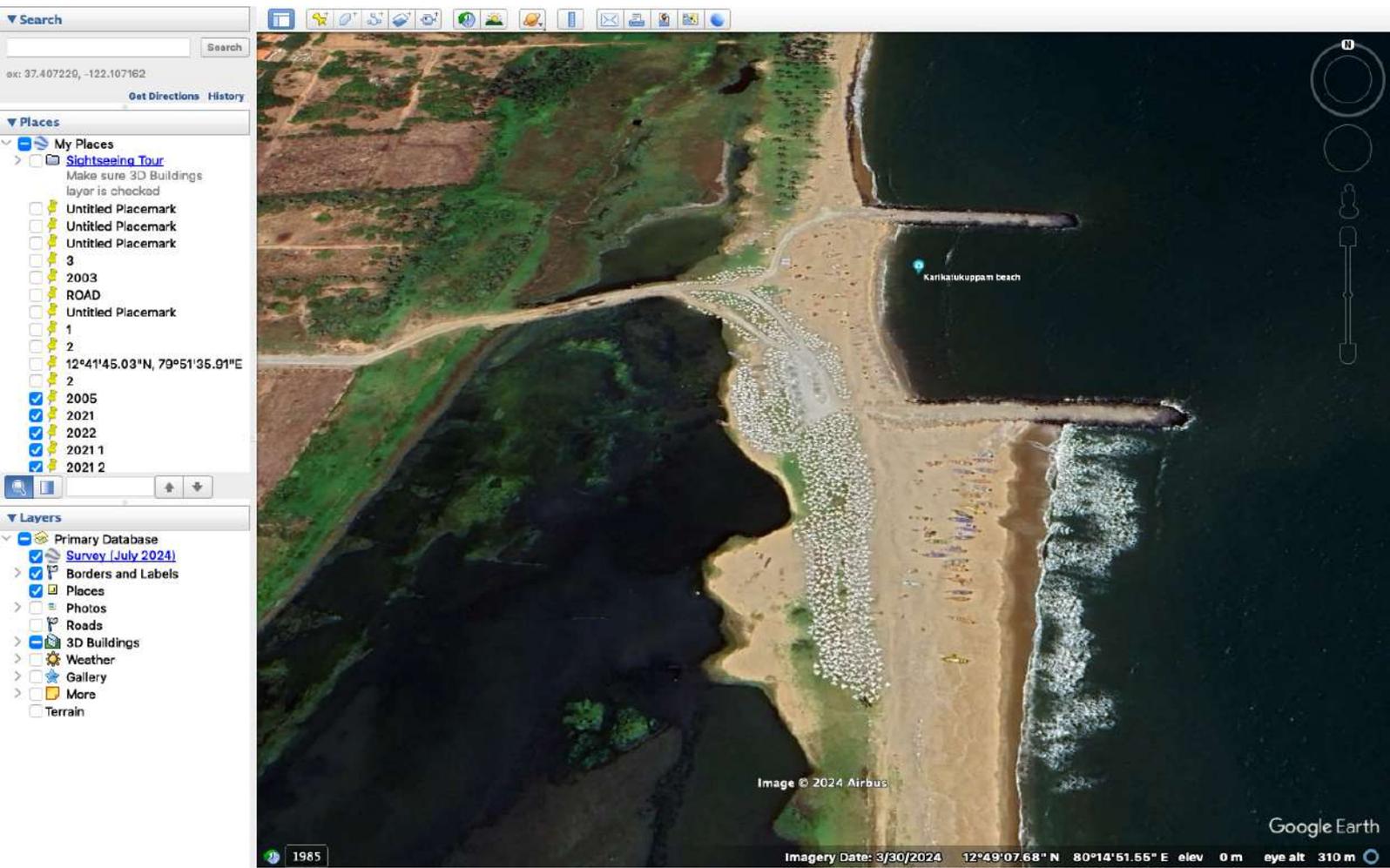
# YEAR - APRIL 2023



# YEAR - 2024



# YEAR 2024 (TETRAPODS)



# YEAR - 2024 (WITH GROYNES)

