

WP(C) No. 14541 of 2026

MONDAY, THE 22ND DAY OF JUNE 2026

WP(C) No. 14541 of 2026

K.K.N. KURUP & ANOTHER

VS

STATE OF KERALA & OTHERS

ADVS FOR PETITIONER/S:

SRI.K.R.ARUN KRISHNAN, SMT.DEEPA K.RADHAKRISHNAN,
SMT.ASHALATHA K., SMT.ADITHYA V.M.

ADVS FOR RESPONDENT/S:

SRI.K.MOHANAKANNAN

**RAJA VIJAYARAGHAVAN V.
&
K.V. JAYAKUMAR, JJ.**

WP(C) No. 14541 of 2026

Dated this the 22nd day of June, 2026

ORDER

Raja Vijayaraghavan V, J.

This matter was, in fact, reserved for judgment. However, after considering the averments in the Writ Petition, the stand taken by the respondents in their counter affidavit, and the facts and circumstances of the case, we are of the view that the matter requires deeper consideration.

2. Essentially, the prayer in this Writ Petition is for the issuance of directions commanding the respondents to provide adequate and essential public facilities for the pilgrims who throng the Kottiyoor Temple. The reliefs sought include the provision of sufficient rain-proof shelters, clean and hygienic sanitation facilities, separate changing rooms for women, medical aid posts, safe drinking water, and proper pathways. Directions are also sought for making necessary arrangements to ensure effective implementation of measures to prevent overcrowding, stampedes, and similar incidents. Another grievance projected in the Writ Petition is the absence of safe road access, adequate barricades, lighting, and sanitation facilities. The petitioners have also sought directions for the formulation and implementation of a comprehensive Master Plan for the holistic development of the Kottiyoor pilgrimage centre, focusing on sustainable infrastructure, crowd management, traffic regulation,

parking facilities, and environmental protection. Various other reliefs have also been sought.

3. We find that, insofar as the administration of the temple is concerned, a Coordinate Bench of this Court in MFA No. 74 of 1988 and connected cases framed a scheme for the administration of Sree Thricherummanna @ Kottiyoor Devaswom. The said scheme came into force with effect from 06.04.1994. As per the scheme, the administration, control, and management of the Devaswom are vested in the Board of Trustees. The Board of Trustees consists of hereditary trustees, non-hereditary trustees, and one ex officio member, the Rajah of Kottayam or his nominee, along with the President and Secretary of Sri Kottiyoor Perumal Seva Sanghom.

4. Clause 21(i) of the Scheme stipulates that the Chairman of the Board of Trustees or the Executive Officer shall not interfere with the religious or spiritual matters pertaining to the Devaswom.

5. The records placed before us reveal that the Kottiyoor Temple is situated in the forested region of Wayanad District. It is a place of great mythological and religious significance and also possesses considerable environmental importance owing to its location within the Kottiyoor Wildlife Sanctuary and on the banks of the Bavali River. The natural surroundings of the temple include dense forests, river streams, and hilly terrain, and it creates a unique sacred landscape where religious practices and ecology coexist harmoniously. The annual pilgrimage and festival emphasise temporary, eco-sensitive structures,

thereby preserving the fragile ecosystem while accommodating lakhs of devotees. Traditional materials such as bamboo, timber, and thatch are utilised for temporary shelters, ensuring minimal ecological disturbance and easy biodegradability. The conservation efforts undertaken reflect an intrinsic balance between spiritual heritage and environmental concerns, embodying the principle of coexistence between nature and culture.

6. We also take note of the fact that the area was previously governed by the Malabar Private Forest Act, 1948. However, new laws have been enacted, which include the Wildlife (Protection) Act, 1972, the Forest (Conservation) Act, 1980, the Indian Forest Act, 1927, the Eco-Sensitive Zone (ESZ) Guidelines, 2011, issued by the Ministry of Environment, Forest and Climate Change, and the relevant guidelines of the Kerala Forest Department.

7. The Vaishakha Mahotsavam held at the revered Kottiyoor Temple, a 28-day annual festival held during May–June, is one of Kerala's most important religious gatherings. Over the years, lakhs of devotees have thronged the temple to pay their obeisance to the Lord. Only temporary and simple structures are permitted at the Akkare (east bank) shrine. The temple is also surrounded by an 80-acre sacred grove. The Kottiyoor temple complex is situated on gently undulating terrain, with the lowest point of the area lying at approximately 120–125 metres above sea level. The Ikkare temple occupies a slightly higher elevation of 150–155 metres, while the Akkare temple is situated at 135–140 metres, close to the Bavali River, which flows at around 120 metres. Any future development or planning within the

temple precincts must take into account this topography so as to ensure that the natural drainage patterns remain undisturbed.

8. The challenges identified and highlighted in the Writ Petition include logistical overload resulting in severe traffic congestion on narrow roads due to the influx of lakhs of pilgrims during the 28-day festival. This, in turn, adversely affects emergency access. The second concern relates to temporary infrastructure and the annual, labour-intensive exercise of constructing and dismantling all ritual structures at Akkare Kottiyoor using biodegradable materials. Insofar as environmental protection is concerned, considerable difficulties are being faced in managing large pilgrim crowds and the consequent generation of waste within the protected 80-acre sacred grove and the surrounding wildlife sanctuary.

9. Since the temple festival is conducted during May–June, coinciding with the monsoon season, the safety of devotees crossing and navigating the Bavali River during heavy rains is yet another issue that needs redressal. It also appears that, notwithstanding the large influx of devotees, scientific methods of waste management are not being adequately implemented. The records indicate that during the 2024 festival season alone, the footfall was approximately 40 lakh devotees in this environmentally sensitive zone, leading to significant congestion. The administration is also required to coordinate numerous local communities having specific traditional rights in relation to various festival rituals and processions.

10. The petitioners have further highlighted that the roads leading to the temple are poorly maintained and steep, making access difficult, particularly for

elderly and differently-abled devotees. Another issue highlighted is the insufficiency of parking facilities. It is stated that thousands of vehicles, including buses and motorcycles, are used by devotees to access the temple, but adequate parking facilities are lacking. The temple also does not possess sufficient space to cater to the needs of devotees, including the conduct of Annadanam. As a consequence, concerns relating to cleanliness and food safety are also raised.

11. We find from the records that approximately 40 acres of Government land remain unutilised. The National Institute of Technology (NIT), in its report on the Sustainable Development and Ecotourism Management of Kottiyoor, has recommended that the said land be utilised for parking facilities. Various proposals have also been made for the erection of temporary structures using local and reusable materials to ensure sustainability, cultural appropriateness, and reversibility. The report further recommends the installation of bio-toilets and composting facilities using locally available materials such as bamboo, laterite, timber, and clay tiles, following sustainable and reversible design principles. It also recommends the construction of temporary rope bridges during monsoon seasons and festivals to ease the movement of devotees by providing alternative crossing routes.

12. Insofar as crowd management and accessibility are concerned, the report recommends the establishment of organised parking and vehicle drop-off zones to alleviate overcrowding. It is suggested that designated parking areas on the periphery of the temple site be developed to accommodate private vehicles and two-wheelers, thereby minimising congestion near the sacred premises. Separate drop-off zones for buses and larger vehicles have also been proposed to enable

devotees to disembark safely without obstructing pedestrian movement. The report further recommends the erection of temporary bamboo or timber fences for crowd regulation and safety without disturbing the natural ecosystem of the temple. The introduction of a virtual queue and the assessment of the carrying capacity of the temple are also to be ascertained to ensure that the pilgrims are not subjected to undue hardship. We are of the view that the issues raised in the Writ Petition concern environmental protection, forest conservation, wildlife management, public infrastructure, crowd regulation, and pilgrimage administration, all of which require consideration by the various statutory authorities so that the issues faced by the devotees can be addressed before the ensuing festival season.

13. Accordingly, we deem it appropriate to suo motu implead the following authorities as additional respondents in this Writ Petition:

(Addl. R6) Union of India, through the Secretary, Ministry of Environment, Forest and Climate Change, Indira Paryavaran Bhawan, Jor Bagh, New Delhi — 110003.

(Addl. R7) Principal Chief Conservator of Forests & Head of Forest Force, Office of the PCCF & Head of Forest Force I Floor, Vanalakshmi, Forest Headquarters, Vazhuthacaud, Thycaud P.O., Thiruvananthapuram - 695014;

(Addl. R8) The Chief Wildlife Warden, O/o the PCCF (Wildlife) & Chief Wildlife Warden, II Floor, Vanalakshmi, Forest Headquarters, Vazhuthacaud, Thiruvananthapuram, Kerala - 695014;

- (Addl. R9) The Conservator of Forests, O/o the Chief Conservator of Forests (Northern Circle), Northern Circle Office, Forest Complex Kannothumbal, Thana P.O., Kannur, Kerala - 670012;
- (Addl. R10) The Divisional Forest Officer, Divisional Forest Office, Kannur Forest Division, Forest Complex, Kannothumbal, Thana P.O., Kannur, Kerala - 670012;
- (Addl. R11) The Director, Kottiyoor Wildlife Sanctuary, Kandappunam - Nellyodi Road, Kottiyoor, Kannur District, Kerala, India - 670674;
- (Addl. R12) The Kerala State Pollution Control Board (KSPCB), represented by its Member Secretary, Pattom P.O., Thiruvananthapuram – 695 004;
- (Addl. R13) The Secretary, Local Self Government Department (LSGD), Government Secretariat, Thiruvananthapuram - 695001; and
- (Addl. R14) The Secretary, Kottiyoor Grama Panchayat, Kottiyoor P.O., Kannur District, Kerala, PIN - 670651.

14. The Registry shall carry out the impleadment. The learned ASGI shall take notice for and on behalf of the MoEFCC. The learned Government Pleader shall take notice for additional respondent Nos. 7 to 11 and 13. The learned Standing Counsel takes notice for additional respondent No. 12. Issue notice to the Secretary, Kottiyoor Grama Panchayat, by Speed Post. The learned ASGI, the learned Government Pleader, and the learned Standing Counsel shall obtain instructions

WP(C) No. 14541 of 2026

from the respective respondents regarding the measures that may be adopted to address the issues faced by the revered temple.

Tag this matter along with WP(C) No. 20262 of 2026 and post on 03.07.2026.

Sd/-
**RAJA VIJAYARAGHAVAN V,
JUDGE**

Sd/-
**K.V. JAYAKUMAR,
JUDGE**

APM