

**BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE**

ORIGINAL APPLICATION NO. 25 OF 2025

IN THE MATTER BETWEEN

Vanashakti & Anr.

... Applicants

Versus

City and Industrial Development Corporation of Maharashtra

(CIDCO) & Ors.

... Respondents

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Advocate for the Applicants

15.05.2025

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ADDITIONAL AFFIDAVIT ON BEHALF OF THE APPLICANTS

I, Stalin Dayanand, aged 59 years, Indian Inhabitant, the Applicant No.2, herein having office at Nandkumar Pawar House, Opp. Shri. Jagganath Darshan Building, MD Kenni Marg, Bhandup Village (East), Mumbai- 400 042 do hereby solemnly state on oath as under:

1. I say that I am filing this affidavit pursuant to the order dated 08.04.2025 by which the Applicants were directed to supply the evidence to demonstrate that the gradient of the hill at Survey No. 24/1/2/3/4 at Village Nanoshi, Tehsil Panvel, District Raigad is more than 1:5.
2. I say that the Applicants are hereby providing the required details through the satellite imagery by calculating the Gradient Ratio on the basis of the formula that **Gradient = Rise (elevation)/ Run (Length)** at the steepest point of the concerned. The rise is the highest elevation minus the start of the steepest side of the hill. The length is the horizontal distance between the path of the rise.





3. I say that the hill on the subject plot does not cover the plot in its entirety but a portion on it and, therefore, the length of the hill portion alone has been measured to determine the slope of the hill as the subject matter of the OA deals *inter alia* with hill cutting and excavation/quarrying. I say that the Google Earth satellite imagery further confirms that the top of the hill is at 59 metres at its highest point from the 50 metres at the point where the hill starts, ^{at 50 metres} therefore the rise is **9 metres** which can be seen at the elevation profile on the satellite imagery and the same is encircled for reference.

4. I say that to assess the 'Run' or length of a hill, the Applicants have identified the steepest length of the hill through the Google Earth image of Survey No. 24 by drawing a path (*straight yellow line in the middle of the plot*) and the said length, as per the satellite imagery, comes to **44.55 metres**. Annexed and marked hereto as **ANNEXURE A-1** is a copy of the screenshot of the satellite imagery providing details of the length and elevation of the hill at Survey No. 24/1/2/3/4 at Village Nanoshi, Tehsil Pannel, NAINA, District Raigad.

5. Upon calculating the Gradient on the basis of the formula as stated aforesaid (**Gradient Ratio = 9 m/44.55 m**), the gradient comes to **1:4.95**, which is greater than 1:5.

6. I further say that without prejudice to the above, the Applicants have taken latest photographs of the subject lands in April, 2025 to demonstrate the vast extent of illegal excavation and hill cutting that has been undertaken. The photos clearly demonstrate the excavation of the hilly soil is being



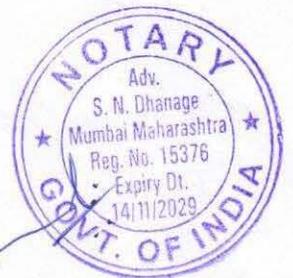


undertaken to flatten the hill and causing grave environmental damage in the region that has the potential of causing landslides, extreme flooding, changing the course of natural catchment area during the monsoon and loss of flora and fauna endemic to the region. Annexed and marked hereto as **ANNEXURE A-2** are photographs clicked by the Applicants in April, 2025.

- 7. I say that to demonstrate the alarming hurriedness with which the entire hill is being flattened, a comparative satellite imagery is being annexed herewith that shows the massive change in the hilly landscape from February, 2024 to April, 2025. Therefore, the application deserves to be heard on an urgent basis and an interim relief in terms of Para 23(d) be granted. Annexed and marked hereto as **ANNEXURE A-3** is a copy of the satellite imagery of February, 2024 and April, 2025 showing historical change to the subject land.
- 8. I say that the instant affidavit may, therefore, be taken on record and that the interim reliefs sought at Para 23(d) in the instant Original Application be immediately granted.

Solemnly declared at Mumbai
On this 15th day of May, 2025

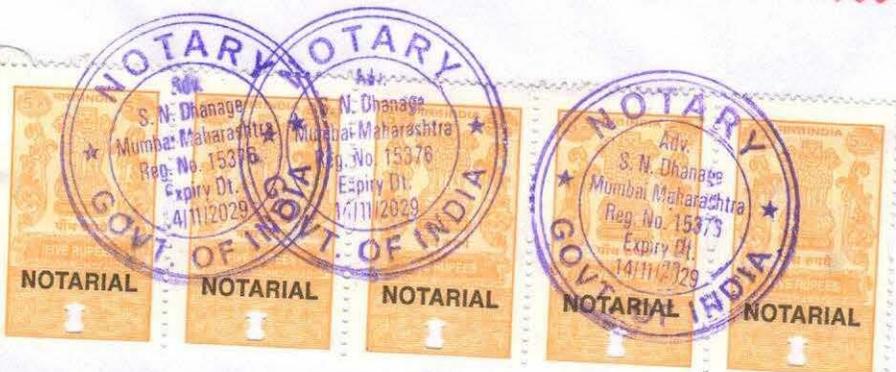
Advocate for the Applicants



Applicant No. 2
BEFORE ME

Dhanage

Adv. S. N. Dhanage
Notary Govt. of India
Regd. No. 15376, MUMBAI (MS)
404-405, 4th Floor, Leaver House,
97/11, Near Central Camera Bldg.,
D. N. Road, Fort, Mumbai - 400001.
Mob.: 8591697834



NOTED & REGISTERED
Page No. 92 Sr. No. 4114
Date 15 MAY 2025

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ANNEXURE A-218

Ruler

Line Path Polygon Circle 3D path 3D polygon

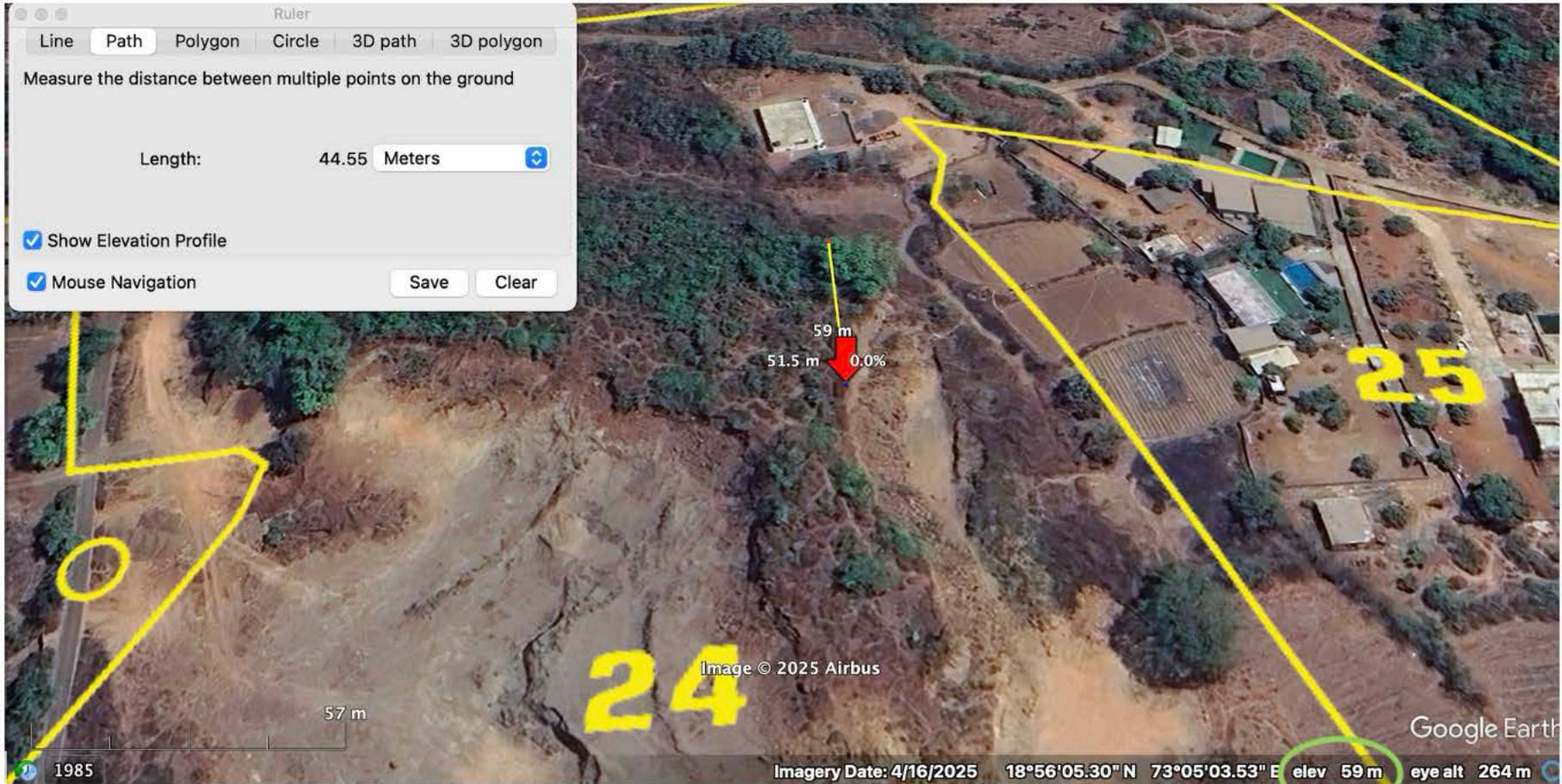
Measure the distance between multiple points on the ground

Length: 44.55 Meters

Show Elevation Profile

Mouse Navigation

Save Clear



The Golf
[Signature]

All Photographs clicked in April, 2025



















The copy
L. S. /

Satellite Image – Feb 2024



Satellite Image – April 2025



Time copy
L. S. S.

**BEFORE THE NATIONAL GREEN
TRIBUNAL, WESTERN BENCH
SITTING AT PUNE
O.A. NO. 25 OF 2025**

IN THE MATTER BETWEEN

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ADDITIONAL AFFIDAVIT

Dated this 15th Day of May, 2025

ZAMAN ALI

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