

BEFORE
THE HON. NATIONAL GREEN TRIBUNAL
(WESTERN ZONE – PUNE) 1ST FLOOR, NEW ADMINISTRATIVE
BUILDING, OPP.
COUNCIL HALL, PUNE

AFFIDAVIT IN OA-109 OF 2025

IN THE MATTER OF:-

HASMUKHBHAI BAHECHARBHAI PARMAR,

....The Applicant in Person

VERSUS

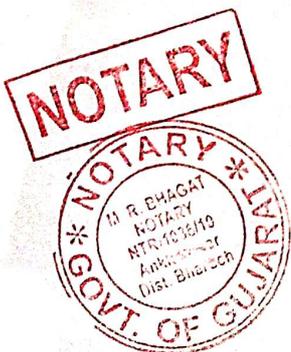
HON. SECRETARY, (WATER RESOURCES) MINISTRY OF NARMADA, WATER
RESOURCE, WATER SUPPLY, AND KALPSAR, GANDHINAGAR & 5 Ors.

.....Respondents

MOST RESPECTFULLY SOWETH THAT:-

I, Hasmukhbhai Bahecharbhai Parmar, Applicant in Person in the OA 109/2025 do here by solemnly affirm and state as under, regarding the order dated 03/11/2025 of the Hon. Tribunal.

1. I respectfully submit that Hon. Tribunal directed me to clarify the position as to whether this is a private dispute of the matter touching the environment or its violation and further that, as far as the information provided by the office of the Collector, the applicant has remedy to the appeal before the Appropriate Forum. In this regard.
 - a. It is submitted with due respect that whatever grievance raised as the applicant in person in this present OA is to remove the encroachment of concrete construction from the floodplain zone of the Narmada River and this grievance neither touches of the my village nor Naugama village but it concerns for the entire floodplain zone of the Narmada river in Bharuch district.
 - b. It is respectfully submitted that whatever concrete construction had been begun by the Respondent no.06 IDEAL CLEAN ROOM LLP at Survey No. 168-B at Naugama village Taluka. Ankleshwar which is situated in the floodplain zone of the Narmada River. Regarding this I gave complaint to the collector office and whatever information provided in an RTI by the office of the Collector regarding my complaint which I have mentioned in this present OA, it is the only additional presentation and only kindly information to the Hon. Tribunal. Regarding the entry removing I haven't prayed before the Hon. Tribunal. So it is my humble prayer that this present OA should be considered and entertained as to remove encroachment from the floodplain zone of the Narmada River only.



[Handwritten Signature]

- c. It is respectfully submitted that I have written about the wall mark of the flood level on the compound wall of the Respondent No.06 in para no. 3.10 on the page no.15 of this present OA and also I have attached the photograph of the wall mark as Annexure-A15 on the page number 117 of paper book.
- d. It is submitted with respect that furthermore, it is my humble request to the Hon. Tribunal that please see the page number 92 and 93 of the paper book. Seeing these two pages, the hon. Tribunal will come across the effect of the flood at this place where the construction of Respondent No.06 is being stood.
- i. The encroachment of the concrete construction of The Respondent No.06 is one of the encroachment among the other such encroachment of the concrete construction in the floodplain zone of the Narmada River.
- e. It is respectfully submitted that the present OA is only touching the Environment regarding to remove whatever encroachment of concrete construction from the floodplain zone of the Narmada River. There are two orders regarding floodplain zone of the Mahanadi of the Hon. Tribunal (EZ) as below,
- i. OA 22/2020 (EZ), Dilip Kumar Samantaray v/s State of Odisha Board & Ors in which *“the directions for keeping floodplain zone of the Mahanadi River at Cuttack free from encroachment and other activities and using the reclaim area only for dense forest.” (the copy of the order has been attached already as Annexure – A08 in the paper book)*
 - ii. OA 68/2020 (EZ), Pradip Kumar Pattnaik v/s Union of India & Ors in which *“there are directions for taking steps for protection of floodplain zone of Mahanadi river, reclaimed land was directed to be developed as dense forest.”*
 - iii. Regarding this, please see the photographs of the various encroachments in the floodplain zone of the Narmada River have been already attached as Annexure – A13 on the page numbers 105 to 113 of the paper book on the present OA.
 - iv. It is my humble request to the Hon. Tribunal that please observe the page number 107 which is the photograph regarding a school named “RMPS SCHOOL” during the flood of the Narmada River. Now it is painful matter that a similar encroachment of GURUKUL (Resident school) is being created just near to the Respondent No.06 which photograph has been attached on the page number 105. Now when if there is huge flood in coming future suddenly what would be the remedy and this will be the huge grievance of mine.

NOTARY



f. I came across when the construction was being done at the site and I complained to the Collector office with presenting my grievance regarding to protect the floodplain zone of the Narmada River before that time the Collector office had already given the N.A. permission to them.

2. It is respectfully submitted that my entire grievances reveal on the page No. 16, my entire interim prayers along with the permanent prayers reveal on the page No. 17 in this present OA are regarding to the Environment Aspects only. Among these permanent prayers the four are as under,

3. I respectfully submit that I complaint to the Respondent No.02 dated 05/09/2024 with the two orders of the Hon. Tribunal those reveal what importance of the floodplain zone for the existence of the river.

4. It is respectfully submitted with humble prayer that considering the above facts my OA 109/2025 must be admitted in the interest of justice to protect the floodplain zone of the Narmada River.

Deponent,

HASMUKHBHAI BAHECHARBHAI PARMAR,
Applicant in Person

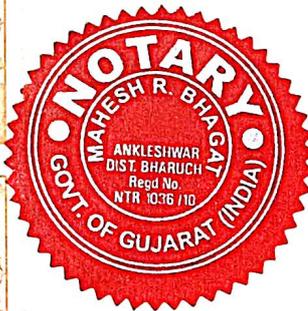
Place:- Ankleshwar

Date:- 18 November 2025

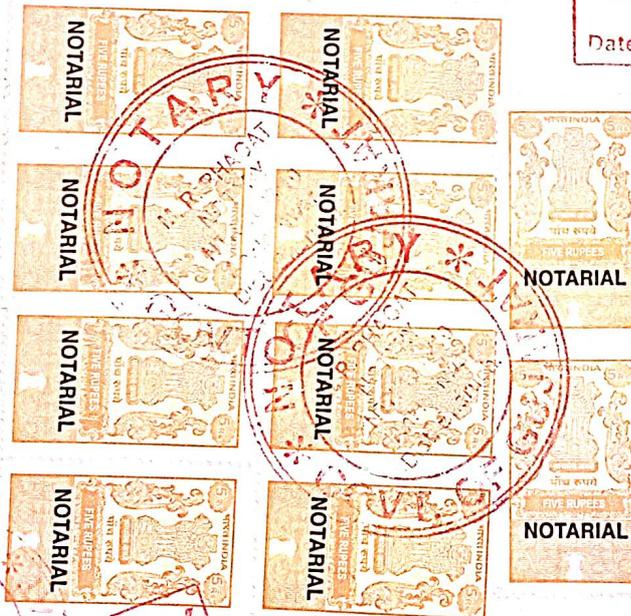
Regd. No. 2443125
Date 18 NOV 2025

SOLEMNLY AFFIRMED
BEFORE ME
M. Bhagat
M. BHAGAT
NOTARY
NTR/1036/10
ANKLESHWAR, DIST. BHARUCH

Mo. 98245 47611
MAHESH R. BHAGAT
NOTARY Docu. Reg. No. 2443125
Date 18/11/25
Reg. No. NTR/ANK/1036/10
Ankleshwar-01, Dist. Bharuch



18 NOV 2025



NOTARY