

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

Original Application 131/2025

Vandana Chavan & Ors

... Applicant

Versus

PMC & Ors

... Respondent

AFFIDAVIT IN REPLY ON BEHALF OF RESPONDENT NO 2

I, Yogesh Sopan Alhat, aged 42 yrs, adult, having office at Pimpri Chinchwad Municipal Corporation, Mumbai Pune Road, Pimpri Pune-411018, the Authorized Representative for Respondent No 2 do hereby state and affirm as under.

1. I say that I am working as Executive Engineer in Environment Engineering Department, at Respondent no 2 Corporation and hence I am competent to swear this Affidavit in Reply. I hereby deny all the contents of the said Original Application, save to the extent specifically admitted. Nothing herein may be deemed to be admitted for lack of a specific traverse.
2. At the Outset the Answering Respondent submits that the Respondent No 1 Pune Municipal Corporation has moved IA No 11/2026 Which is an Interlocutory Application for dismissal of the Original Application on the issue of maintainability. The Answering Respondent hereby adopts the said IA in its entirety and joins issues with respect to the challenge of the present Original Application on the issue of maintainability. The Answering Respondent is not filing another I.A. on the same issue in order to avoid prolixity and verbosity.
3. The Answering Respondent further submits that the present Original Application is an indirect attempt to challenge the Environment Clearance dated 12.11.2024 after almost one year

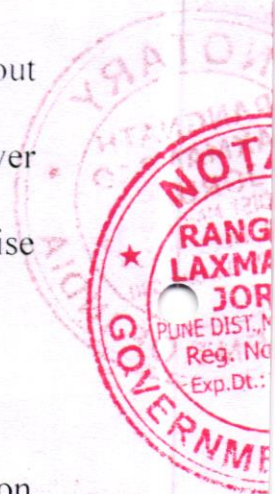


after the said Environment Clearance was issued, since directly challenging the same would be time barred. Further the present Original Application amounts to duplicity of proceedings, taking into consideration the number of Original Applications and Appeals filed with respect to the same issue. Thus the Present Original Application ought to be dismissed on this ground alone.

4. The Applicant is trying to bring in the issue of the present project being hit by the Blue line as per the circular of the irrigation department dated 21.09.1989 and thereby the Applicant is trying to couch it as an issue which involves a substantial question of law relating to the Environment. The Answering Respondent submits that the Environment Clearances dated 16.11.2019 and 12.11.2024 have precisely covered all the above issues and the Applicant is not raising any "Substantial Question of Law relating to the Environment" in the present Original Application.



5. The Answering Respondent submits that Considering that all the issues sought to be raised in the present Original Application are squarely covered by the various ECs granted to the same project and the Original Applicant is merely trying to challenge the EC dated 12.11.2024 and the previous EC without actually doing so. The issue of the carrying capacity of the river has already been previously covered and thus it does not raise any new issue.
6. None of the Grounds raised in the present Original Application are legally valid. The very basis of the Original Application is the indirect challenge to the Environment Clearances which is not permissible by way of an Original Application. The Answering Respondent submits that the EC is a substantive document which has been granted only upon conducting a scientific study, and none of the grounds raised by the Applicant are valid. If the submissions of the Applicant are to be considered, it will negate the whole purpose of obtaining an Environment Clearance. Furthermore, since the EC has not



been challenged, none of the grounds mentioned by the Applicant can be taken into consideration. thus the present Original Application deserves to be dismissed.

S. Shambhi
Adv for Respondent No 2

[Signature]
Respondent No 2
Executive Engineer (Environment)
Pimpri Chinchwad Municipal Corporation
Pimpri - 411018.



Solemnly Affirmed on
this 7th day of April 2026
at Pimpri, Pune

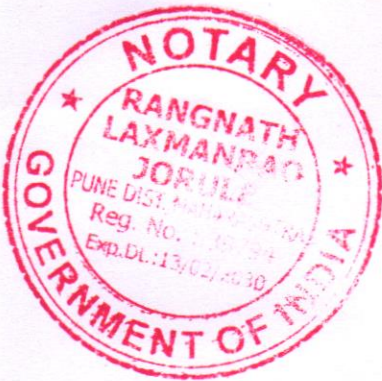


BEFORE ME

[Signature]

RANGNATH LAXMANRAO JORULE
ADVOCATE & NOTARY
GOVT. OF INDIA
Pimpri, Pune Dist.

07 APR 2026



Documents Produced By

Name : maresh prakash Raut

Address : near mauli park, Hingwadi

Mob. No. : 7028230615

Signature : *[Signature]*

To whom I know personally

[Signature]

NOTED & REGISTERED

AT SR. NO. : 24/2026