

**BEFORE THE NATIONAL GREEN TRIBUNAL SITTING AT
PUNE**

APPEAL NO. 20 OF 2022

Paul Lobo and Ors)... Appellants

Versus

Goa Coastal Zone Management Authority and Anr)... Respondents

LIST OF DOCUMENTS ON BEHALF OF THE APPELLANTS

DATED 30.05.2024

SR NO	PARTICULAR	PAGE NO.
1	Annexure A-1 - Colour images at pages 111-119 of the Appeal Paperbook	111-119
2.	Annexure A-2 - Colour copy of Images at pages 732-738 of the Paperbook (Affidavit of the Appellants dated 09.01.2023)	732-738
3	Annexure A-3 - Colour copy of Images at pages 1199 to 1204 of the Paperbook (Affidavit of the Appellants dated 29.05.2024)	1199-1204
4	Annexure A-4 - Colour copy of recent additional images tendered by the Appellants	1-4

ANNEXURE A-1

Photographs



Photograph 1



Photograph 2

2



Photograph 3

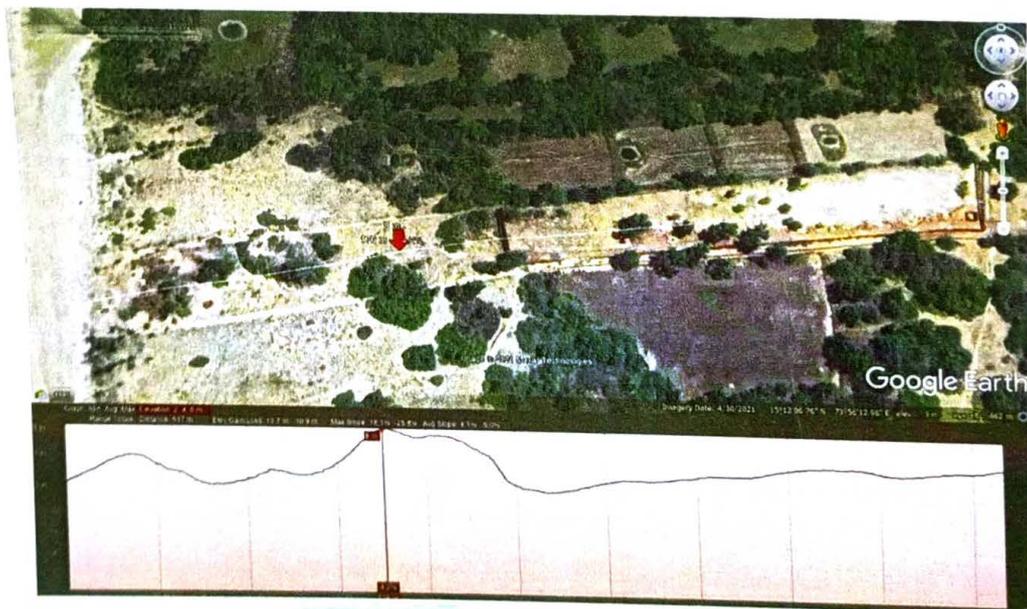


Photograph 4



GE Image showing low-lying field and probable direction of rainwater overflow into the sea.

photo 5



Longitudinal Profile through Sy no. 134/3 of Cavelossim.

photo 6

Proposed location of storm water drain through property



A-huge sand dune aprox 5 to 7 metes height x 40 meters base. is cut and flattened,

B-dark blue line area is partially filled with construction debris over sand of flattened dunes

C-Low lying land is same level with, south side (paddy field s.n 134/4, and north side paddy field s.n134/2

low lying land north side, paddy fel s.n 134/2

yellow line wester side across fencing by damaging sand dunes

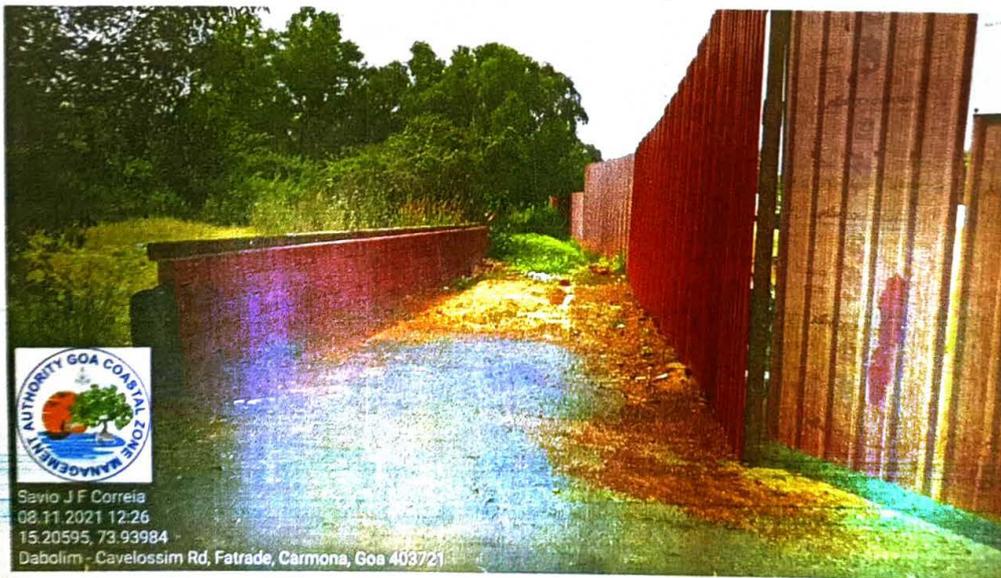
Note- 1) there is no mention of low lying land in the property, which is at same level of paddy fields on both side of the property,
2) there is no mention of western side fencing and damaging of sand dunes,

photo 7

Photographs 1



Photograph 1



Photograph 2

2



Photograph 3



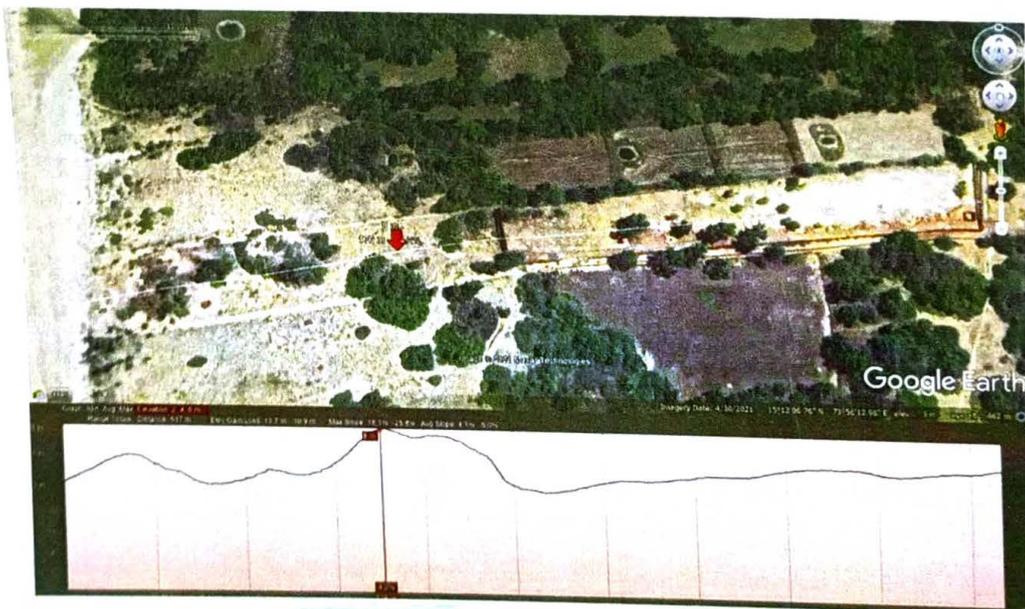
Photograph 4



4

GE Image showing low-lying field and probable direction of rainwater overflow into the sea.

photo 5



Longitudinal Profile through Sy no. 134/3 of Cavelossim.

photo 6

Proposed location of storm water drain through property



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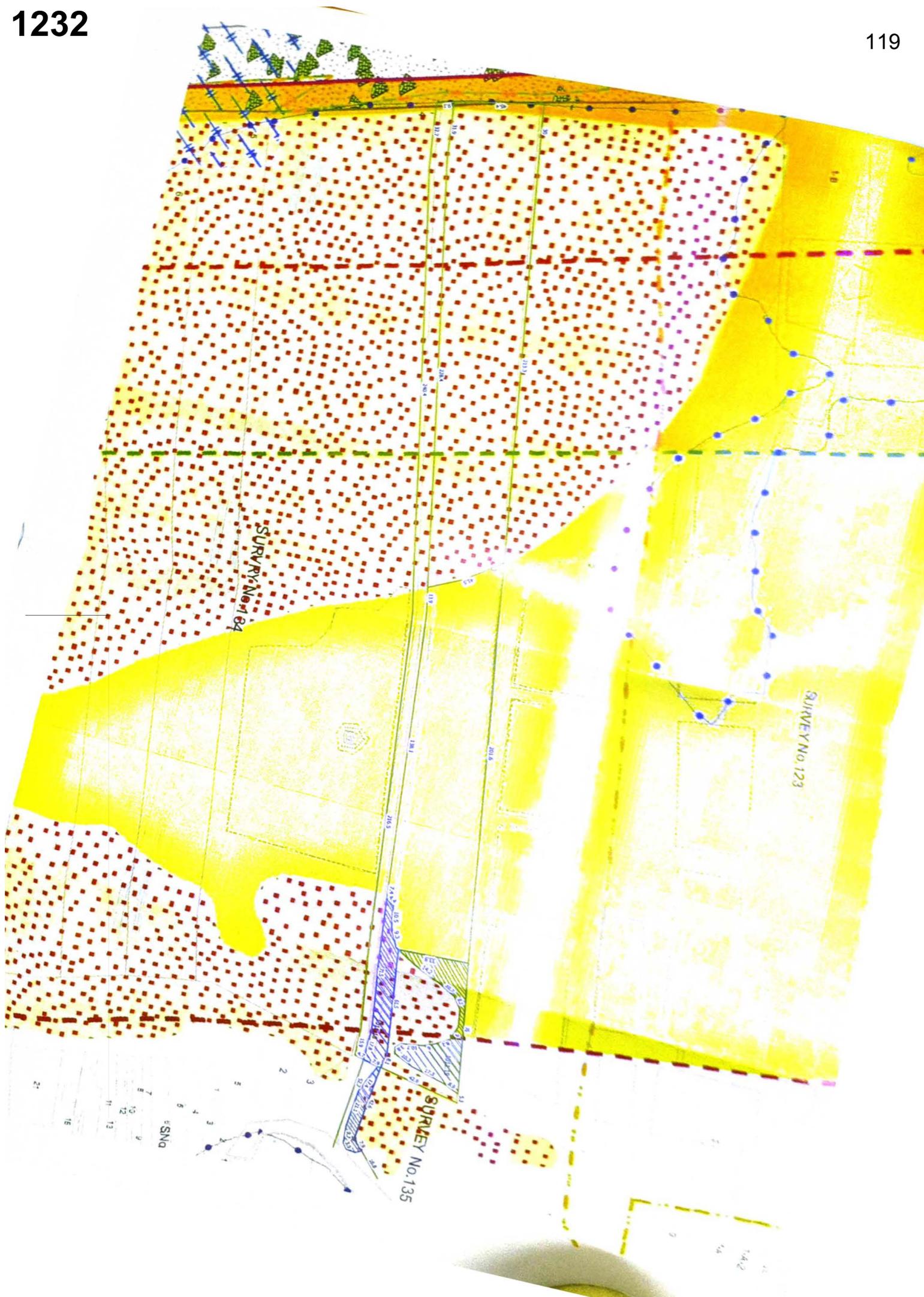
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SURVEY No. 135

SURVEY No. 134

SURVEY No. 123

ANNEXURE A-2



Latitude: 15.201805
Longitude: 73.939432
Elevation: 32.41m
Accuracy: 4.5m
Time: 04-01-2023 15:28
Note: nova

STRUCTURE CONSTRUCTED ON SAND DUNE AT SOUTH-EAST CORNER OF PLOT



Latitude: 15.201799
Longitude: 73.939443
Elevation: 30.41m
Accuracy: 4.5m
Time: 04-01-2023 15:28
Note: nova

COMPOUND WALL CONSTRUCTED ON SAND DUNE ON EASTERN BOUNDARY OF PLOT



Latitude: 15.201687
 Longitude: 73.939586
 Elevation: 30.41m
 Accuracy: 5.0m
 Time: 04-01-2023 15:29
 Note: nova



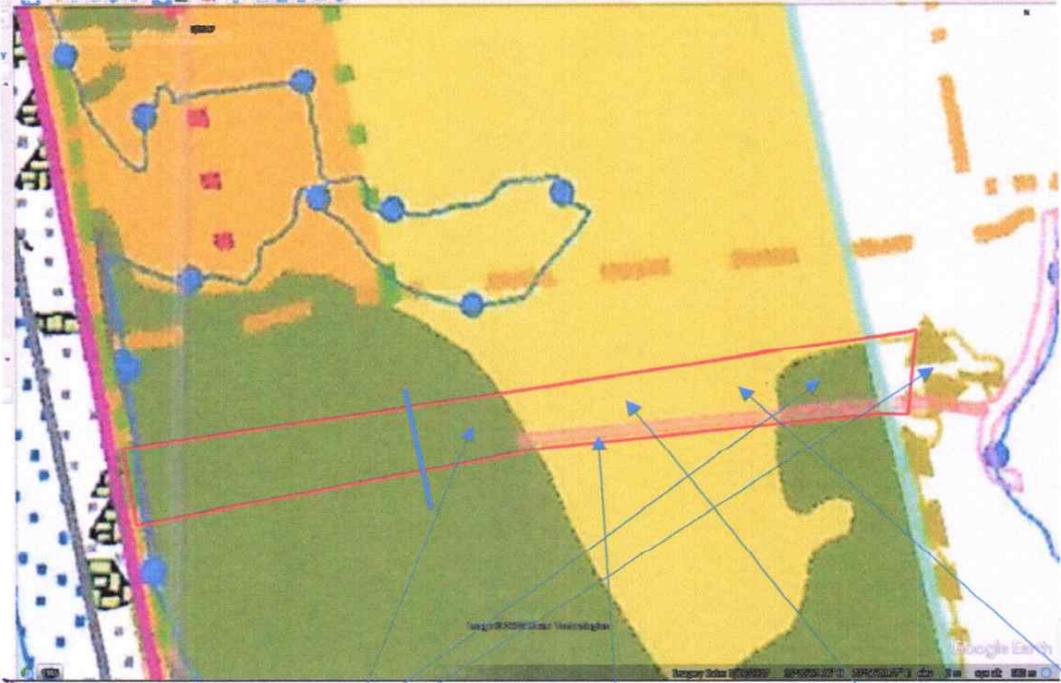
ACCESS ROAD CONSTRUCTED ON SAND DUNE IN SY NO 135/4, CAVELOSSIM



Latitude: 15.201804
 Longitude: 73.939438
 Elevation: 32.41m
 Accuracy: 6.0m
 Time: 04-01-2023 15:27
 Note: nova

INTERNAL ROAD SHOWN ON CZMP DOES NOT EXIST, PROPOSED ROAD AND SOUTHERN WALL ON AREA MARKED AS SAND DUNE ON CZMP

Final CZMP



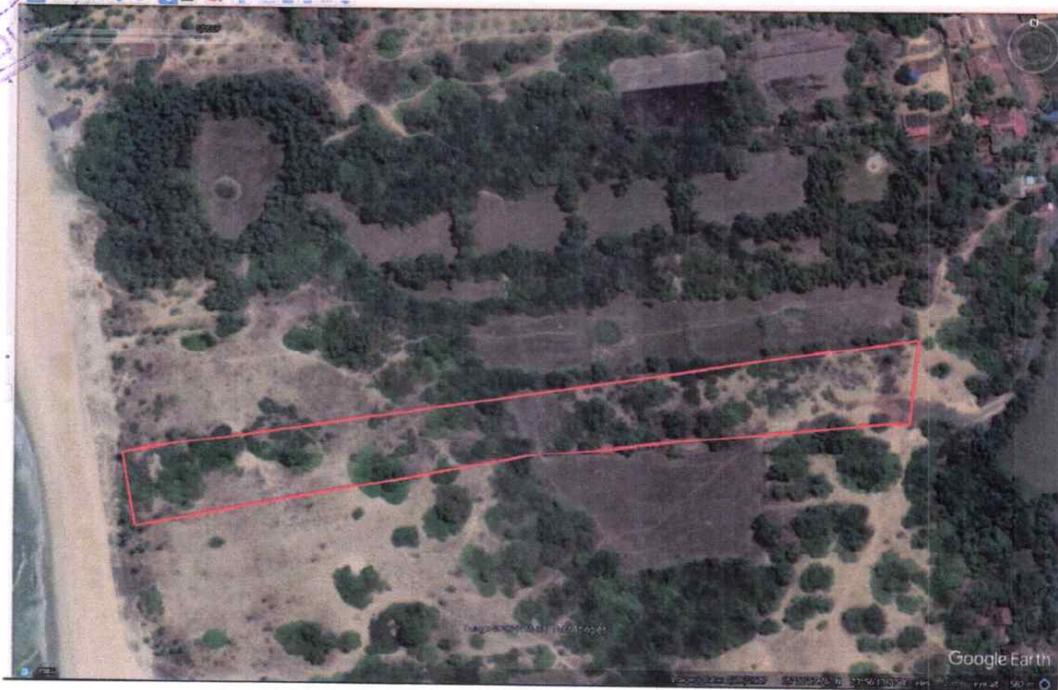
Sand Dunes demarcated within project site Road shown illegally Low-lying area Sand dune not demarcated



Google earth image of October 2015 shows no road existing within the plot and no access road also (sand dune is cut, but road is not constructed)



Google earth image of December 2015 shows no road existing within the plot and access road has been constructed within the past 2 months



Google earth image of May 2017 shows no road or other constructions exist within the plot and the sand dunes and low-lying area are still intact



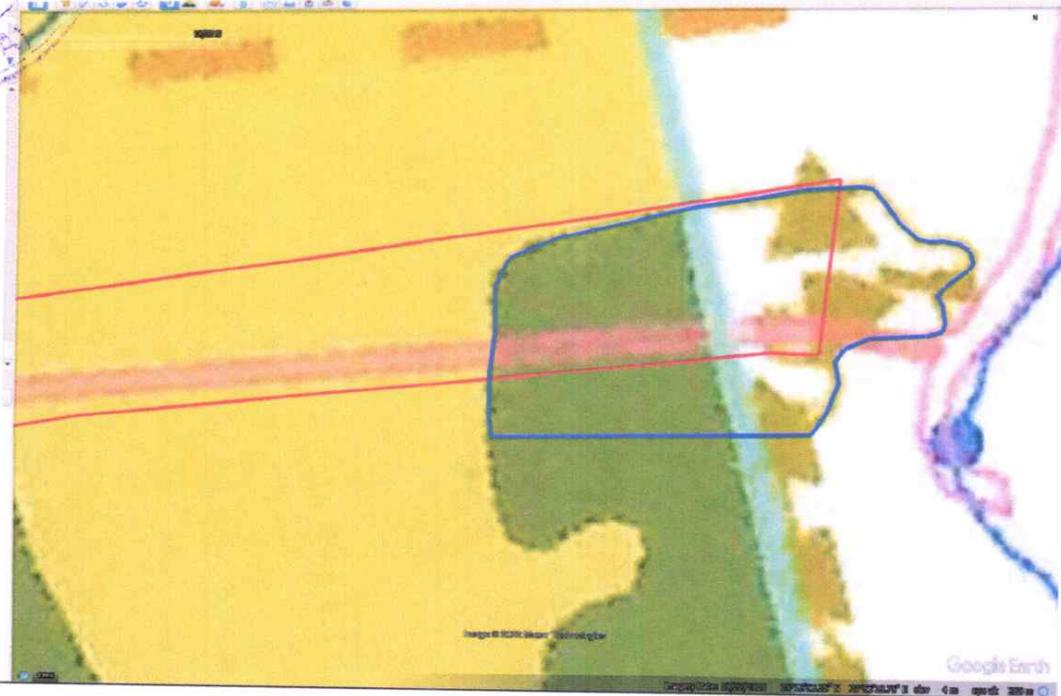
Google earth image of November 2017 shows low-lying area and part of sand dunes are being flattened. No road exists within the plot, but compound wall/fencing is commenced and levelling is carried out



Latest google earth image shows that no road exists within the plot even today



Close up of Google earth image of Oct 2015 showing the absence of any road within the plot and also no access road. However, sand dune is seen partly cut.



CRZ-I demarcation in CZMP disallows (i) compound wall constructions, (ii) the access road to the plot, (iii) the road within the plot of land, (iv) the structure constructed at S-E corner and (v) the structures proposed to be constructed

Low Lying area having an elevation of only 2 m above MSL, part of retention and drainage infrastructure for flood prevention

Line demarcating 200 m from HTL



Sand dunes demarcated on final CZMP

Sand dune not demarcated on final CZMP



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1199

ANNEXURE A -3

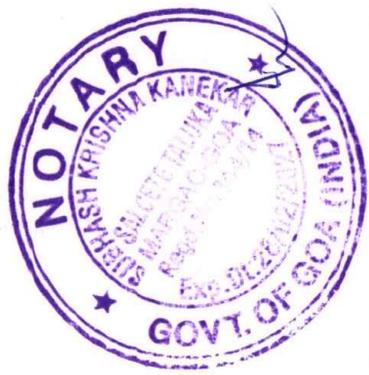


Appellant No 1's homestay

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1200

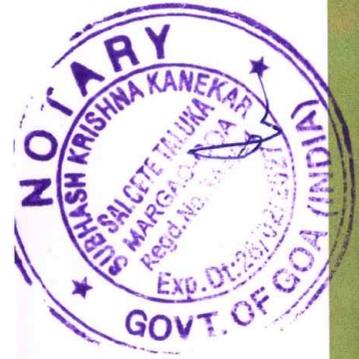
1200 1241



Appellant No 3's residence, where he rents a few bikes

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ANNEXURE A-2

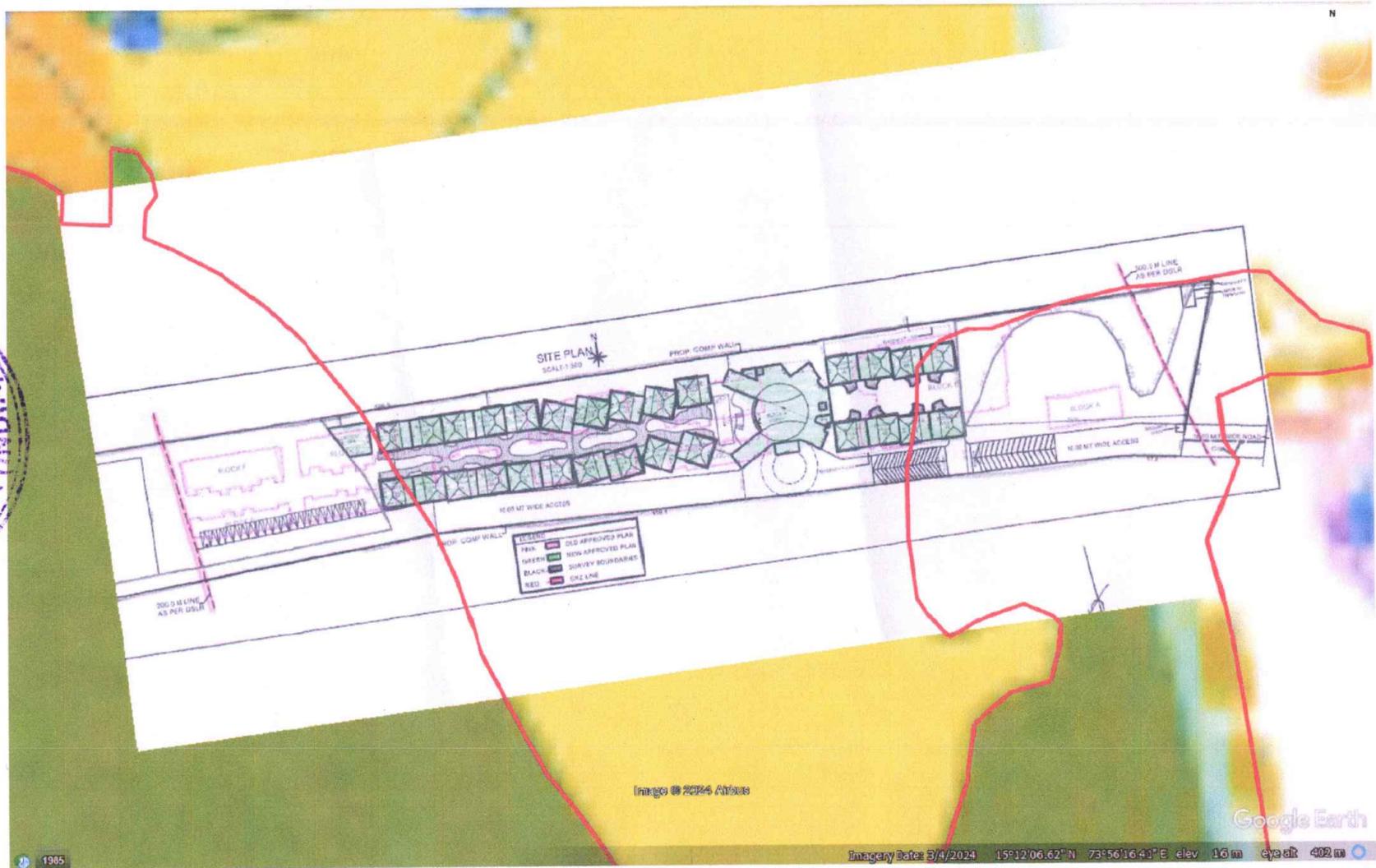
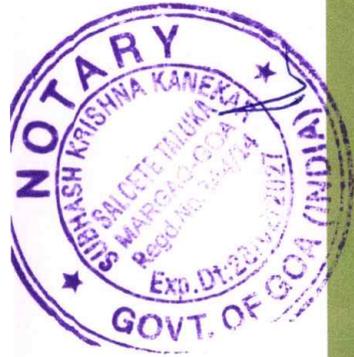


CZMP 2011 is overlaid on Google Earth image and Sand dunes identified and demarcated on CZMP 2011 (in olive green) are marked with red lines

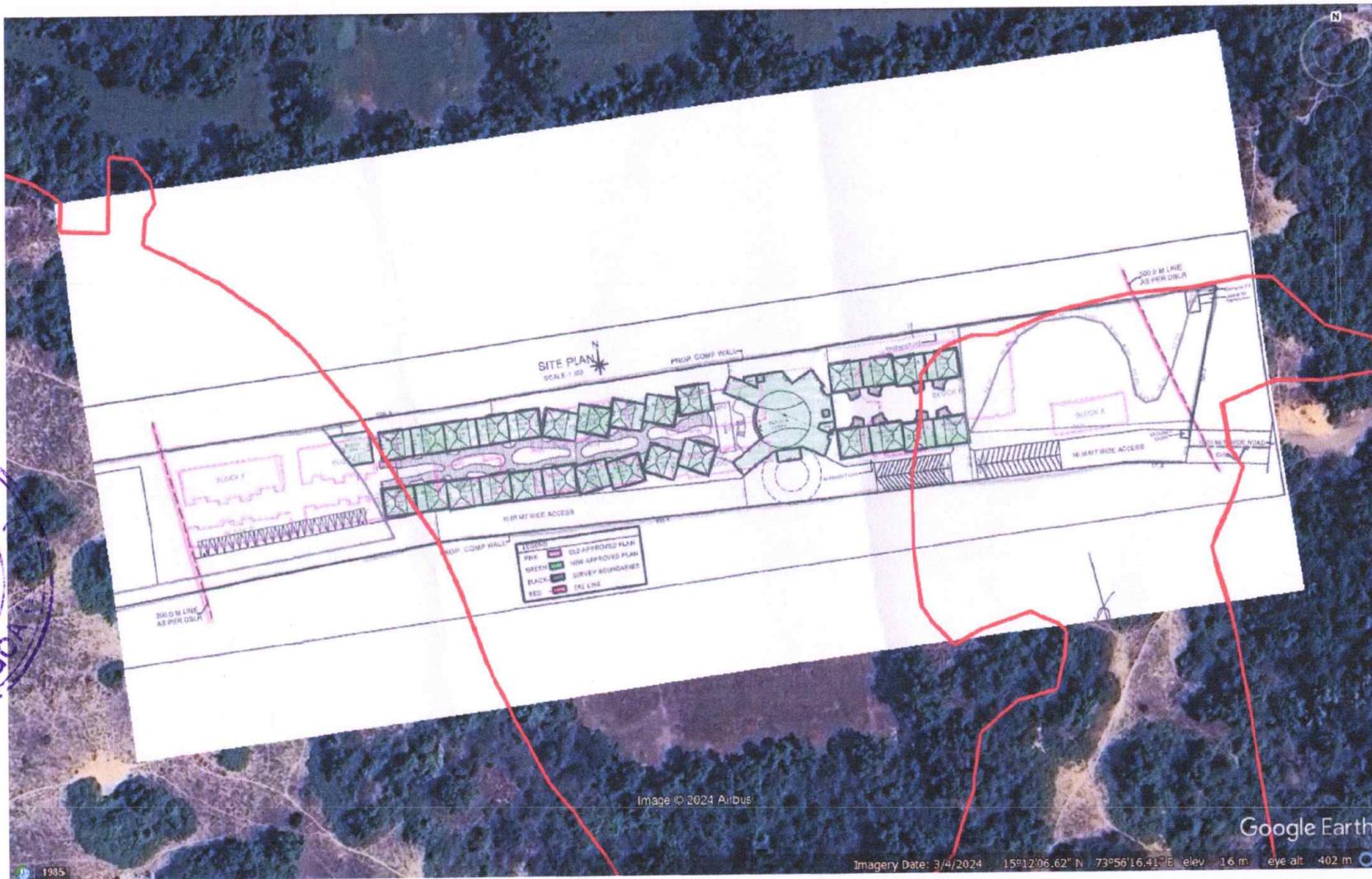
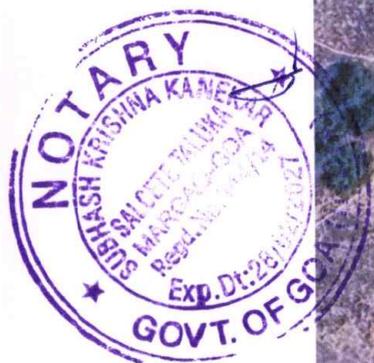
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1202

1202 1243



CZMP 2011 is overlaid on Nova final plan, and Sand dunes identified and demarcated on CZMP 2011 are marked with red lines



Nova final plan overlaid on Google Earth image clearly shows gross violations of CZMP 2011 have taken place/are proposed as detailed in paragraphs 13, 14 and 15 of the affidavit in rejoinder

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1204 1245



Red lines demarcating sand dunes identified by CZMP 2011 overlaid on Google Earth image clearly show that fresh CRZ-I violations have already taken place

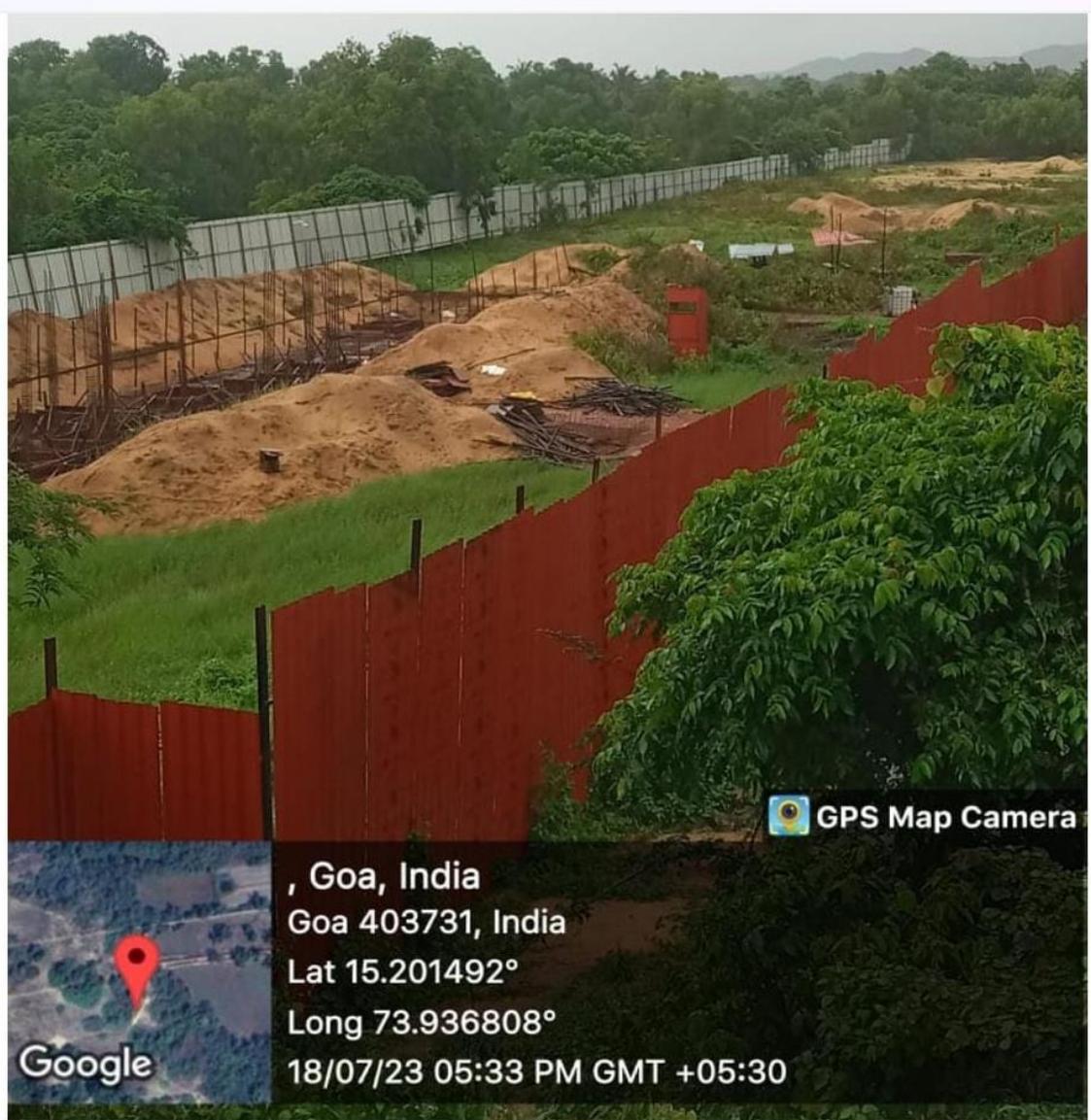
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Trench being dig for compound wall in 200 meters crz, by cutting sand dunes ,sand dunes height is approx 40 meters, it is a long range of approx 800meters from Navy wall to Sr.No, 123



The wall constructed on the southern side of sy no 134/3, Cavelossim village has completely blocked the natural drainage and flow of flood water



Construction has started in sy
no 134/3, Cavelossim village in
the past 2-3 weeks

