

907

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH AT NEW DELHI

REJOINDER BY APPLICANT

In

ORIGINAL APPLICATION NO. 511 OF 2023

IN THE MATTER OF

Priyank Bharati

APPLICANT IN PERSON

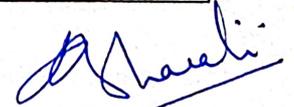
Versus

State of Uttar Pradesh through Chief Secretary, Uttar Pradesh and Ors.

RESPONDENTS

INDEX

S.No	Particulars	Page No.
1.	Rejoinder by Applicant	01 - 03
2.	Annexure 1	04 - 06
3.	Annexure 2	07 - 08



Priyank Bharati
Applicant in Person

Date : 17/12/25
Place : Meerut

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RESPONDENTS

REJOINDER BY APPLICANT

MOST RESPECTFULLY SHOWETH;

I, Priyank Bharati aged about 37 years R/O Jagriti Vihar Meerut hereby solemnly affirm and declare as under:

1. **That, Respondent No. 1 (Chief Secretary, Government of Uttar Pradesh), as well as Respondent 2 (District Magistrate Meerut), Respondent 3 (SDM Mawana) have utterly failed and neglected to prevent and restrain ongoing construction activities in the floodplain area of River Budhi Ganga, situated in Tehsil Mawana, District Meerut, despite their statutory obligations under the prevailing environmental and revenue laws.**
2. **That, despite repeated and continuous emails sent by the Applicant, the soft copy of the cross-section of River Budhi Ganga has not yet been provided to the Applicant. Copies of the relevant emails evidencing such repeated requests are annexed herewith and collectively marked as Annexure 1.**

3. That, the encroachments in the floodplain of River Budhi Ganga, particularly in the Hastinapur region and District Meerut, have not been stopped and continue unabated, in violation of the applicable laws and directions. A copy of the email bringing this fact to the notice of the concerned authorities (Respondent 1, and 2⁽²⁾) is annexed herewith and marked as Annexure 2.
4. That, since the year 2023, construction activities have been continuously carried out in the concerned area, which clearly demonstrates non-compliance with the applicable statutory provisions, regulatory norms, and directions issued by the competent authorities, and therefore cannot, by any stretch of imagination, be construed as compliance.

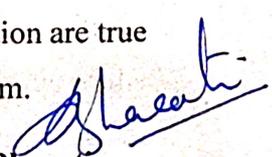
In view of the foregoing facts and circumstances, it is most respectfully submitted that the continued failure of the Respondents to provide the requisite information, prevent illegal encroachments, and restrain ongoing construction activities in the floodplain of River Budhi Ganga amounts to gross non-compliance with statutory duties and binding directions of the competent authorities. Such inaction has resulted in irreversible environmental degradation, violation of the public trust doctrine, and serious prejudice to the rights of the Applicant and the affected ecology. The Applicant, therefore, humbly prays that this Hon'ble Tribunal may be pleased to take appropriate action in accordance with law in the interest of justice, environmental protection, and sustainable river management.

For all the reasons stated above the Hon'ble Tribunal may kindly be pleased to take cognizance of all these facts and to pass appropriate orders to meet the ends of Justice and equity.

AND FOR THIS ACT OF KINDNESS THE APPLICANTS, AS IN DUTY BOUND, SHALL EVER PRAY.

Verification

Verified on this 17th day of Dec. 2025 that the contents of the present Application are true and correct to my knowledge and belief and nothing material is concealed therefrom.


Priyank Bharati

Applicant in Person

Date: 17/12/25
Place: Meerut

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH AT NEW DELHI

ORIGINAL APPLICATION NO. 511 OF 2023

IN THE MATTER OF

Priyank Bharati

APPLICANT IN PERSON

Versus

State of Uttar Pradesh through Chief Secretary, Uttar Pradesh and Ors.

RESPONDENTS

Affidavit

I, Priyank Bharati aged about 37 years R/O Jagriti Vihar , Meerut do hereby solemnly affirm and declare as under:

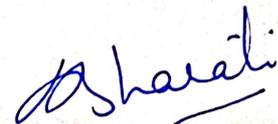
1. That I am the Applicant/Applicant In Person in above mentioned application and I am fully conversant with the facts and circumstances of the case and therefore competent to swear this affidavit.
2. That, the statements made in paragraphs 01 to 04 of this affidavit is true to my knowledge



Applicant In Person

VERIFICATION

Verified on this 17th day of Dec, 2025 that the contents of the present Application are true and correct to my knowledge and belief and nothing material is concealed therefrom.



Applicant In Person

/Deponent

Arshakur 1

04



Priyank Bharati <naturalsciencetrustmrt@gmail.com>

In respect to Original Application No. 511/2023 Hon'ble National Green Tribunal,
New Delhi

1 message

Priyank Bharati <naturalsciencetrustmrt@gmail.com>

Fri, Dec 5, 2025 at 11:40 AM

To: cegangaidupme-up@nic.in, csup@nic.in, Pramod Kumar <eedrainagemeerut@gmail.com>

Cc: "Consultant Judicial-NGT(P.B.)" <judicial-ngt@gov.in>

Bcc: bhanwar jadona <bhanwar09jadon@gmail.com>

Respected Sir,

In connection with Original Application No. 511/2023 pending before the Hon'ble National Green Tribunal, New Delhi, I respectfully submit that I have not yet received the soft copy of the river cross-section data.

I kindly request you to provide the said soft copy at the earliest, as it is essential for further proceedings and preparation of documents related to the matter.

Thank you for your kind cooperation.

Regards,
Priyank Bharati
Applicant

True copy
Shaeeli
17/12/25



Priyank Bharati <naturalsciencetrustmrt@gmail.com>

Request for soft copy of River cross-section Data in OA 511/2023 Hon'ble NGT, New Delhi

3 messages

Priyank Bharati <naturalsciencetrustmrt@gmail.com>
 To: bhanwar jadon <bhanwar09jadon@gmail.com>, cegangaidupme-up@nic.in
 Cc: "Consultant Judicial-NGT(P.B.)" <judicial-ngt@gov.in>

Thu, Nov 20, 2025 at 2:19 PM

Respected Sir,

In connection with **Original Application No. 511/2023** pending before the Hon'ble National Green Tribunal, New Delhi, I respectfully submit that I have not yet received the soft copy of the river cross-section data.

I kindly request you to provide the said soft copy at the earliest, as it is essential for further proceedings and preparation of documents related to the matter.

Thank you for your kind cooperation.

Regards,
 Priyank Bharati
 Applicant

Priyank Bharati <naturalsciencetrustmrt@gmail.com>
 To: bhanwar jadon <bhanwar09jadon@gmail.com>, cegangaidupme-up@nic.in, csup@nic.in

Wed, Nov 26, 2025 at 11:24 AM

----- Forwarded message -----

From: Priyank Bharati <naturalsciencetrustmrt@gmail.com>
 Date: Thu, Nov 20, 2025 at 2:19 PM
 Subject: Request for soft copy of River cross-section Data in OA 511/2023 Hon'ble NGT, New Delhi
 To: bhanwar jadon <bhanwar09jadon@gmail.com>, <cegangaidupme-up@nic.in>
 Cc: Consultant Judicial-NGT(P.B.) <judicial-ngt@gov.in>

Respected Sir,

In connection with **Original Application No. 511/2023** pending before the Hon'ble National Green Tribunal, New Delhi, I respectfully submit that I have not yet received the soft copy of the river cross-section data.

I kindly request you to provide the said soft copy at the earliest, as it is essential for further proceedings and preparation of documents related to the matter.

Thank you for your kind cooperation.

Regards,
 Priyank Bharati
 Applicant

Priyank Bharati <naturalsciencetrustmrt@gmail.com>
 To: csup@nic.in, bhanwar jadon <bhanwar09jadon@gmail.com>, cegangaidupme-up@nic.in, Pramod Kumar <eedrainagemeerut@gmail.com>

Mon, Dec 1, 2025 at 11:40 PM

----- Forwarded message -----

From: **Priyank Bharati** <naturalsciencetrustmrt@gmail.com>

Date: Thu, Nov 20, 2025 at 2:19 PM

Subject: Request for soft copy of River cross-section Data in OA 511/2023 Hon'ble NGT, New Delhi

To: bhanwar jadon <bhanwar09jadon@gmail.com>, <cegangaipurme-up@nic.in>

Cc: Consultant Judicial-NGT(P.B.) <judicial-ngt@gov.in>

Respected Sir,

In connection with **Original Application No. 511/2023** pending before the Hon'ble National Green Tribunal, New Delhi, I respectfully submit that I have not yet received the soft copy of the river cross-section data.

I kindly request you to provide the said soft copy at the earliest, as it is essential for further proceedings and preparation of documents related to the matter.

Thank you for your kind cooperation.

Regards,
Priyank Bharati
Applicant

True Copy
Shashi
17/12/25

Request for immediate prohibition of construction activities and removal of encroachments in the floodplain of Budhi Ganga, District Meerut (In reference to OA 511/2023 in Hon'ble NGT, New Delhi)

1 message

Priyank Bharati <naturalsciencetrustmrt@gmail.com>
To: dmmee@nic.in, namamigange.meerut@gmail.com, csup@nic.in
Cc: "Consultant Judicial-NGT(P.B.)" <judicial-ngt@gov.in>

Mon, Dec 15, 2025 at 8:33 PM

15.12.2025

To
The Chairman
District Ganga Committee
Meerut, Uttar Pradesh

Subject: Request for immediate prohibition of construction activities and removal of encroachments in the floodplain of Budhi Ganga, District Meerut (In reference to OA 511/2023 in Hon'ble NGT, Principal Bench New Delhi)

Respected Sir,

I respectfully submit this application to bring to your kind notice the continuing and serious violations taking place in the floodplain area of **Budhi Ganga River, in District Meerut**, despite the matter being **sub judice before the Hon'ble National Green Tribunal (NGT), New Delhi**.

It is pertinent to state that **floodplain zoning and river demarcation of Budhi Ganga are presently under process by the Irrigation Department**, and until the completion of such demarcation and zoning, **all construction and developmental activities are legally required to remain completely prohibited** in the concerned riverine and floodplain areas.

However, it is a matter of grave concern that **illegal constructions, encroachments, and land alterations are continuously taking place in the Budhi Ganga floodplain region of Hastinapur as well in other areas in District Meerut**, without any effective preventive or punitive action from the concerned authorities. Despite repeated complaints and representations, **no strict or deterrent action has been initiated**, thereby causing irreversible damage to the river ecosystem and posing a direct threat to its natural flow, flood-carrying capacity, and ecological integrity.

I respectfully submit that under **Section 55 of the Ganga (Rejuvenation, Protection and Management) Authorities Order, 2016**, the **District Ganga Committee is vested with the powers and functions to prevent encroachments, regulate activities, and ensure protection of the Ganga and its tributaries**, which undoubtedly includes **Budhi Ganga**, being a historically and ecologically significant paleochannel and tributary system of the River Ganga.

The continued inaction in this matter is not only **contrary to the statutory mandate of the District Ganga Committee**, but also defeats the very objective of river rejuvenation and protection envisaged under the said Order and various directions of the Hon'ble NGT.

Therefore, I humbly request your good office to:

1. **Immediately impose a complete ban on all construction and developmental activities** in the floodplain and demarcation zone of Budhi Ganga, Hastinapur as well as in other areas in District Meerut, until floodplain zoning and demarcation are lawfully completed.
2. **Initiate strict action against illegal encroachments and unauthorized constructions**, including issuance of stop-work notices and removal proceedings, in accordance with law.
3. **Ensure compliance with the ongoing proceedings before the Hon'ble NGT**, so that no irreversible damage is caused during the pendency of the matter.

Failure to take immediate action may result in permanent loss to the river system and may also amount to **dereliction of statutory duty** under the Ganga (Rejuvenation, Protection and Management) Authorities Order, 2016.

I trust that your esteemed office will take **prompt and decisive action** in the larger public interest, environmental protection, and rule of law.

Thanking you.

Yours faithfully,

Priyank Bharati

Copy to :

1. Hon'ble NGT, Principal Bench New Delhi
2. Chief Secretary, Uttar Pradesh

True copy
Shankh
17/12/25

 Budhi Ganga urgent letter.pdf
98K