BEFORE THE NATIONAL GREEN TRIBUNAL,

(WESTERN ZONE) BENCH AT PUNE

Appeal No. 144 of 2024 (WZ)

BETWEEN

Alchemist Asset Reconstruction Company Ltd.

...Appellant

V/s

Goa Coastal Zone Management Authority & Anr.

...Respondents

AFFIDAVIT IN REJOINDER ON BEHALF OF THE APPELLANT TO THE REPLY FILED BY THE RESPONDENT NO. 2

MOST RESPECTFULLY SHEWETH:

I, Akshat Sharma, S/o Shri S K Sharma, aged about 36 years, working for gain, at A-270, 1st and 2nd Floor, Defence Colony, New Delhi – 110 024, the authorised representative of the Appellant herein above named, do hereby solemnly affirm and state as under:

PRELIMINARY SUBMISSIONS AND OBJECTIONS:

A. I say that the Appellant has filed the captioned appeal which is pending adjudication before this Hon'ble Tribunal. The captioned appeal has been filed against the

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Area Delhi/NCR
Juris Extd. Whole India
MINATI RANI MOHAPATRA

Order dated 13.05.2024 passed by the Respondent No. 1 bearing Ref. No. GCZMA/NGT Matter/D. Appl. No. 15/2023/22-23/38/504, received by the Appellant by post only on 17.05.2024 whereby the Respondent No. 1 has ordered for a part demolition of the structures erected by Respondent No. 2 on site i.e. in Survey No. 100/10 in Village Agonda, Canacona, Goa.

B. I say that despite specific directions by this Hon'ble Tribunal to file reply *vide* orders dated 01.07.2024, 05.08.2024 and 01.10.2024, the Respondent No. 2 miserably failed to adhere to the timelines directed, and finally filed his reply only on 10.12.2024 i.e. after more than 4 months from initial direction to file such a reply. I say that such an act of Respondent No. 2 only goes to show his scant regard towards the directions/ orders passed by this Hon'ble Tribunal.

C. I say that the present case attempts to unearth the glaring arbitrary way of working of the Respondent No. 1 who has all throughout kept its eyes closed towards the illegal running and operations of the *Dream Discovery Sea*

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India

View Resort & Beach Café ("Dream Discovery") by Respondent No. 2. I say that the GCZMA is in connivance with the Respondent No. 2 and has been complicit in permitting and perpetuating commercial misuse of a residential property on encroached land and allowing Respondent No. 2 to create a false narrative in order to justify illegal occupation of land and development of permanent commercial structures thereon, that too in an ecologically sensitive area.

D. I say that taking note of the blatant environmental violations in this case, the Hon'ble Supreme Court *vide* order dated 22.01.2024 in Civil Appeal No. 553 of 2024 ***(Annexure A-7 @Pg. 196-197)*** has already ordered that the Respondent No. 2 herein and his assignees / purchasers will not carry out any commercial activities in the property in question.

E. I say that without the due intervention of the Hon'ble Supreme Court, the Respondent No. 2 along with his purported lessee were blatantly and continuously carrying out illegal and unlawful commercial operations

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris. Extd. Whole India

Alchemist Asset Reconstruction Company Limited A-2/3 (F.F.) (S.F.) Defence Colony New Delhi

on ground, and such carrying out of operations was right under the nose of the Respondent No. 1 authority which turned a blind eye towards the same, and miserably failed to perform its statutory duties.

F. I say that no part of this rejoinder should construe as admission of any sorts, unless anything particular has been admitted therein. I say that the contents of the captioned Appeal are reiterated and reaffirmed as correct.

G. At the outset I say that on a bare reading of the reply filed by Respondent No. 2, it appears as if the said Respondent is trying to divert from the issues under consideration / adjudication by agitating unrelated issues. It is also crystal clear that by way of the impugned order, the Respondent No. 2 has been declared as an offender by the Respondent No. 1 as a part of its structures has been ordered to be demolished.

H. I also say that since no appeal has been filed by the Respondent No. 2 against the Impugned Order dated 13.05.2024 directing part demolition of structures

NOTARY PUBLIC MINATI RANI MUKHOPATRA App. By Govt. of India Regd. No. 16971 Area Delhi/NCR

Asset Reconstruction Company Limited (F.F.) (S.F.) Defence Colony New Delhi

erected in excess of the 2017 permission(s) (411.08 sq. mts.). As such, since the ISLT has shown the plinth of 1160 sq. mts. hence, 748.92 sq. mts. is admittedly to be demolished. The Respondent No. 2 has impliedly accepted the said order to the extent that the structures raised by Respondent No. 2 have been ordered to be demolished in part. Thus, the Respondent No. 2 having accepted the said order can draw no converse inference thereof. As such, the Respondent No. 2 has admitted to the excess construction on plinth of 748.92 sq. mts. and the issue now is restricting to whether the remaining 41.1.08 sq. mts. is also illegal and is required to be demolished.

I. It is submitted that the moot question(s) which arise for consideration of this Hon'ble Tribunal in the captioned appeal, are as under:

a. Whether the Respondent No.1 failed to *de novo* consider objectively all aspects of the case, as directed by this Hon'ble Tribunal in its Judgment and Order dated 03.01.2024, and also failed to

identify illegal structures in the light of the provisions cited in the said Judgment and Order?

b. Whether the Respondent No.1 erred in ordering demolition of certain unspecified parts of the structures raised on Survey No. 100/10 instead of ordering the demolition of all structures raised by Respondent No.2 in Survey No. 100/10 in *toto*?

J. For the ready and kind perusal of this Hon'ble Tribunal, a table showing the illegal encroachment of land by Respondent No. 2 in Survey No. 100/10, and the changes made in occupation thereof, which has been blatantly been discarded by the Respondent No. 1, is appended below:

Particulars	**Area (In Sq. Mtrs.)**		**Total (In Sq. Mtrs.)**
Land belonging to Maria Fernandes on which there was one house as per Form I & XIV	50		50
ISLR survey plan showing two houses in Sy. No. 100/10	**H. No. 438**	**H. No. 439**	79
	47	32	

<table>
<tr><td rowspan="2">Area as per panchayat NoCs of 1984-85</td><td colspan="2">H. No. 438</td><td>H. No. 439</td><td rowspan="2">803</td></tr>
<tr><td colspan="2">338</td><td>465</td></tr>
<tr><td>Google Earth Images from 2002 onwards</td><td colspan="4">Showing no construction on ground</td></tr>
<tr><td rowspan="2">Area as per GCZMA Permissions dated 04.04.2017 in Sy. No. 100/10</td><td>H. No. 438</td><td colspan="2">H. No. 439</td><td rowspan="2">411.08</td></tr>
<tr><td>217.60</td><td colspan="2">193.48</td></tr>
<tr><td>Area encroached by Respondent No. 2 as per ISLR site plan annexed to Joint Site Inspection Report</td><td>-</td><td colspan="2">-</td><td>1160</td></tr>
</table>

K. I further say that in OA/15/2023, this Hon'ble Tribunal undertook a detailed analysis of the facts and law and arrived *inter-alia* at the following finding(s):

a. *M/s Dream Discovery (Respondent No. 2 therein – lessee of the Respondent No. 2 herein)* had been operating the Resort without obtaining any permission from the GCZMA.

NOTARY PUBLIC MINATI RANI MOHAPATRA App. By Govt. Of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India

Architects Assistance Co-operative Company Limited A-210 (F.F.) (S.F.) Defence Colony New Delhi

b. There was a very casual approach on the part of GCZMA not to have gone through the allegations leveled against Respondent Nos. 2 to 4 in the application nor any explanation has been given as to how the area, which was permitted to be constructed, had been exceeded and what action had been taken in respect of the said excess construction.

c. GCZMA ought to have been vigilant while granting permission as to whether the said persons were obtaining permission for their residential purposes or the same was being obtained for a property leased out to other parties for the purpose of commercial use.

d. Respondent No. 2 herein who belong to a traditional Toddy Tapper Community, by way of lease, had transferred the said land to the lessee, who is running full-fledged Resort on the said land and it is also alleged that the said transfer through

lease-deed was effected even prior to grant of impugned permission.

L. I say that since Permission(s) dated 04.04.2017 were *inter alia* given as a benefit to the Respondent No. 2 for being a member of a traditional Toddy Tapper Community (local community), the said Permission(s) could neither have been transferred to a non-traditional community person, nor could those have been used for a purpose other than a dwelling house .

M. I say that pursuant to the filing of the present appeal, the Appellant has independently and without prejudice to the pendency of the present appeal filed before the Court of Civil Judge, Senior Division, Margao, Goa, a Special Civil Suit being SCS/62/2024 *inter-alia* seeking a declaration that the Respondent No. 2 herein is not entitled to an area of land exceeding 50 sq. mts. in the property surveyed under Survey No. 100/10 in Village Agonda, Canacona, Goa. In this regard it is submitted that the relief(s) claimed by the Appellant in the present appeal *vis-à-vis* the relief(s) claimed in the SCS/62/2024

NOTARY PUBLIC App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India RANI MOHAPATRA

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are completely independent of each other. Moreover, the domains and jurisdictions under which the said suit and present appeal have been filed are completely exclusive and not overlapping with one another.

N. It is reiterated at the cost of repetition that the land surveyed under Survey No. 100/10 of village Agonda, Canacona, Goa, admeasures 5350 sq. mtrs., out of which by virtue of a registered Deed of Sale dated 28.06.1982, one Mrs. Janaki Devappa Dessai and four other persons collectively sold their share (5300 sq. mtrs.) in the said Property to *"Elbee Dugal Engineering Co. Pvt. Ltd."* (name changed later to DPDCL), thereby leaving behind only 50 sq. mtrs. land being available in the said survey. Pertinent to take into consideration that in the relevant Form I & XIV for Survey No. 100/10, name of Janki Devappa Dessai (one of the vendors in the aforesaid Sale Deed) is shown under the column *"Name of the Occupant"* and under the *"Other Rights"* column, the name of Ms. Maria Fernandes "having a house" is reflected. Notably, the Respondent No. 2 is son of Ms.

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ Appt. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India

Maria Fernandes. Thus, the said Respondent No. 2 cannot be entitled to any area / share exceeding 50 sq. mtrs. in the land comprising Survey No. 100/10, in terms of the submission above.

O. It is further submitted that on the basis of him belonging to a Toddy Tapper Community, the Respondent No. 2 applied to GCZMA seeking Permission for reconstruction of House Nos. 438 & 439 in village Agonda, Canacona, Goa, which fact can be corroborated upon perusal of the applications filed by the Respondent No. 2 before the GCZMA in the year 2016.

P. It is submitted that the Permission(s) dated 04.04.2017 *(now set aside under the impugned order passed by Ld. NGT)* to reconstruct House Nos. 438 and 439 obtained by the Respondent No. 2 were palpably mis-utilized by him and his lessee (Project Proponent) to build, construct and operate a full-fledged resort & hotel in the name and style of "*Dream Discovery Sea View Resort & Beach Cafe*", thereby being in direct violation of Condition No. 4 to the Permission(s) dated 04.04.2017.

NOTARY PUBLIC
MINATI RANI MOHAPATRA
App. By Govt. of India
Regd. No. 16971
Area Delhi/NCR
Juris. Extd. Whole India

Asset Reconstruction Company Limited
A-2/0 (F.F.) (S.F.)
Defence Colony
New Delhi

Q. It is submitted that admittedly, the Permission(s) dated 04.04.2017 were mis-utilized by the Respondent No. 2 in as much as the benefits thereof were transferred to a non-traditional community person (lessee) and the said Permission(s) were also used to run and operate a full-fledged commercial establishment in Survey No. 100/10 till the orders passed by the Hon'ble Supreme Court on 22.01.2024.

R. I say that the facts of the present case unequivocally also reveal and establish a direct nexus between the close workings of the Respondent Nos. 1 & 2. It is submitted that the Respondent No. 1 could neither explain its original supervisory lapse, evidenced by its inaction on the Complaint dated 08.06.2022 filed by the Appellant, nor it could explain its persistent lapse while granting the subsequent order dated 13.05.2024. It is submitted that the conduct of the Respondent No. 2 infers turning a blind eye to a Resort being constructed and operated upon under the garb of Permission(s) for reconstructions of houses. A copy of the Complaint dated 08.06.2022

filed by the Appellant is annexed herewith and marked as **ANNEXURE R-1**.

S. It is submitted that there was a clear violation of Condition No. 4 of the Permission(s) dated 04.04.2017 for more than 6 years. Had the intention of the Respondent No. 1 been honest and sincere, it would have taken note of the blatant violations of Permission(s) issued by it while a full-fledged Resort was being constructed and commissioned, and would have exercised its powers prudently and diligently by revoking the Permission(s) dated 04.04.2017 on the basis of Condition No. 5 of the said Permission(s) itself, which Condition is reproduced hereinbelow:

> *"5. This permission is liable to be revoked, if it is found, at any stage, that the application contained false information / wrong plans/ calculations/ documents/ misleading or false information, etc. or account of violation of aforementioned conditions"*

T. It is submitted that had the Respondent No. 1 exercised due diligence, it would have noticed the violation of Condition No. 4 on site which persisted blatantly for over 6 years. Furthermore, had it dug deeper and put

Respondent No. 2 to notice, it would have discovered that there was in fact a lease deed dated 12.09.2016 between the Respondent No. 2 and Mr. Vijay Gokuldas Komarpant *(as admitted by the Respondent No. 2 and which document has not seen light of the day as the Respondent No. 2 has never produced the same before any Court/ Forum)* for exploitation of Houses No. 438 and 439 for commercial purposes even prior to issue of Permission(s) of reconstruction of the said houses.

U. Without prejudice to the above, based on the material on record and the submissions made in the captioned appeal, as well as herein above, I say that the structures raised by the Respondent No. 2 on Survey No. 100/10 are infact, liable to be demolished in *toto*. I say that without adverting to respond to the baseless allegations of the Respondent No. 2, it is now a well established position of fact as under:

a. The Permission(s) dated 04.04.2017 were mis-utilised for being transferred to the lessee (Project Proponent);

b. The structures present on ground have been constructed/ erected by the lessee (Project Proponent) which is in the form of a full-fledged commercial Resort;

c. Since the Permission(s) dated 04.04.2017 have been set aside in its entirety, any commercial structures made in the garb of such Permission(s) are liable to be demolished and brought to ground;

d. Since admittedly the structures on ground were being used as a full-fledged Commercial Resort, an order of partial demolition does not render complete justice;

e. For the sake of argument if it is assumed that after partial demolition the Respondent No. 2 may be permitted to use the remaining structures as a residential house, the structures built on ground are in no shape or form of a residential house. Thus, the entire structures have to be brought to the ground.

NOTARY PUBLIC
MINATI RANI MOHAPATRA
App. By Govt. of India
Regd. No. 16971
Area: Delhi/NCR
Jurisdiction Extd. Whole India

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A-2/0 (F.F.) (S.F.)
Defence Colony
New Delhi

V. I also say and reiterate that the instant case is squarely covered under the second part of Regulation 8 (i) III A (ii) of CRZ, 2011, since the Respondent No. 2's first Application was rejected by the GCZMA under the said provision and, after compliance of the GCZMA directions, the revised Application for reconstruction of houses was approved in favour of the Respondent No. 2. It is also pertinent to state that while by his Application /Revised Application, the Respondent No. 2 sought permission for reconstruction of houses, however, what has actually been done on ground, in pursuance of the said Permission(s) dated 04.04.2017 (now set aside), is a fresh construction of a large commercial resort.

W. I say that in his reply, the Respondent No. 2 has tried to build a new narrative and said that the area of plinth available on ground in Survey No. 100/10 *vis-à-vis* the area of plinth on which Permission(s) were applied for tally for both houses. However, I say that there is no mention in official records, including the Expert Member's Site Inspection Report, about the existence of

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 1697/ Area Delhi/NCR Juris Extd. Whole India

a larger plinth area on ground and/ or Permission(s) being sought for reconstruction on a portion of the said (purported) plinth. The said averment of the Respondent No. 2 is a concocted story, fabricated to justify his illegal activities and actions, which is not borne out from any document on record of the Respondent No.1, available at the time of consideration of Respondent No.2's application and issue of permissions dated 04.04.2017. I further say that on a bare perusal of the Google Earth Images of the subject property as it existed in the year 2016-17 to the present date would unequivocally corroborate the stand of the Appellant that there was no construction or house much less commercial establishment on the land from 2002 to 2016.

X. I also say that the Respondent No. 2 is guilty of convoluting his own submissions. It is submitted that while the Respondent No. 2 continues to agitate his claim regarding the structures on site having a prior commercial usage, on the other hand, there is a document on record i.e. lease deed dated 23.09.2020

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India

Asset Reconstruction Company (India) A-27/0 (F.F.) (S.F.) Defence Colony New Delhi

executed between the Respondent No. 2, his wife and their lessee, which lease bears mention of a prior lease dated 12.09.2016 (which lease deed has been suppressed till date),on the other hand in the website of Dream Discovery the purported lessee publicly claims to have started construction of the commercial resort in December 2020 and putting the same to commercial usage since December 2022. For the ready and kind perusal of this Hon'ble Tribunal, copies of screenshots taken from the website of Respondent No. 2 i.e. https://www.dreamdiscovery.in/ (on 13.07.2023) are annexed as **ANNEXURE R-2 (Colly)**.

PARAWISE REPLY

1. That, the contents of Para 1 in so far as they relate to matter of record, need no reply. However, the remaining contents are denied being wrong and incorrect.

2. That, the contents of Para 2 being matter of record, need no reply.

3. That, the contents of Para 3 being matter of record, need no reply.

4. That, the contents of Para 4, need no reply.

5. That, the contents of Para 5 are wrong and incorrect hence denied. It is submitted that the present Appeal impugns the order dated 13.05.2024 passed by the Respondent No. 1, which order is appealable under Section 16(g) of the National Green Tribunal Act, 2010 ("NGT Act"). It is further submitted that purely environmental issues arising out of violation of CRZ, 2011, as well as violation of terms and conditions of Permission(s) dated 04.04.2017 have been sought to be remedied by this Hon'ble Tribunal. It is further submitted that as regards the resolution of civil disputes, the Appellant has already filed a Civil Suit.

6. That, the contents of Para 6 are wrong and incorrect hence denied.

7. That, the contents of Para 7 are wrong and incorrect hence denied. It is submitted that since the impugned order has been issued only in the name of the Respondent No. 2, the said Respondent has been duly impleaded as a party here and for the same reason Mrs.

NOTARY PUBLIC MINATI RANI MOHAPATRA App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India

Alchemist Asset Reconstruction Company Limited A-2/0 (F.F.) (S.F.) Defence Colony New Delhi

Conceicao Fernandes (wife of Respondent No. 2) is not a necessary party to the present Appeal. Moreover, in the OA/15/2023, *M/s Dream Discovery* (lessee of Respondent No.2) was a party, however, that does not mean that the said *M/s Dream Discovery* is required to be made a party in the present appeal also. The alleged impleadment of other co-owners is also neither warranted nor permissible under the provisions of Section 16(g) of the NGT Act and is only a ploy to divert the issues in the present matter.

8. That, the contents of Para 8 are wrong and mischievous, hence denied.

9. That, the contents of Para 9 are wrong and incorrect hence denied. It is submitted that the contents of captioned Appeal as well as the submissions made hereinabove may kindly be read as part and parcel to the present Rejoinder, as the contents whereof are not being repeated for the sake of brevity.

10. That, the contents of Para 10 are wrong and incorrect hence denied. It is submitted that the present Appeal

raises *inter alia* serious questions about (a) the wilful *malafide* conduct of the Respondent No. 2 in transferring the benefits of the permission dated 04.04.2017 (now set aside) to a person not belonging to a traditional/ local community; (b) the *malafide* conduct of the Respondent No. 2 in raising constructions for commercial exploitation, much in excess of the plinth area over which reconstruction of houses was allowed; and (c) supervisory lapses on the part of Respondent No.1 in discharge of its statutory duties. Furthermore, the present Appeal raises pertinent environmental issue regarding the authority of Respondent No. 1 granting the impugned order on a parcel of land where most of the building/ structure is within 50 mts. of HTL and part of the structure are within 0 to 100 mtrs. of HTL, which is a No Development Zone ("NDZ") and wherein under the relevant provisions of Regulation 8 (i) III A (ii) of the CRZ, 2011, no permission for reconstruction could have been granted by the Respondent No. 1.

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NIVATI RANI MOHAPATRA
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Regd. No. 16971
Area Delhi/NCR
Juris Extd.
Whole India

Asset Reconstruction Company Limited
A-2/3 (F.F.) (S.F.)
Defence Colony
New Delhi

11. That, the contents of Para 11 are wrong and incorrect hence denied. It is submitted that the impugned order suffers from material infirmities and is inconsistent with the prevailing law. It is submitted that the impugned order has been issued in a very casual, cavalier and one sided manner by ignoring relevant facts and circumstances of the case at hand. It is submitted that the Respondent No. 1 has *inter alia* relied upon certain new documents submitted by Respondent No. 2 which had not been submitted at the time of making original applications for reconstruction permission. The said new documents include patently false, fabricated and fraudulent NOCs of Panchayat (allegedly) dated 1984-85 as a desperate and illegal attempt to substantiate the fact that the structures admeasuring approx. 1053 sq. mtrs. were in existence prior to 1991. In this regard the Respondent No. 1 has completely ignored the fact that even as per their own 137th and 144th Minutes the plinth of the houses had been mentioned as 411.08 sq. mts. (217.60 sq. mts. + 193.48 sq. mts.). The relevant extract

of the 144th Minutes of GCZMA, in respect of Case No. 4.4 pertaining to House Nos. 439 *(@ Pg. 165)* is as under:

> *"**Site Inspection Report:** The site was inspected by Shri. Ragunath Dhume, the then Expert member of the GCZMA, The inspection report indicated that the existing land has residential houses. There exists an access. There exists ornamental trees within hte plot. The proposed plot is within 200 m of HTL. There exists an old house. The house is shown on DSLR plan. The name of Applicant's mother is reflected in Form I & XIV. The applicant belong to a toddy tappers community, Certificate is enclosed to the file. The Applicant has a Certificate of Panchayat stating htat the house tax is payed from 1980-81 till 03/06/2015 regularly. Since the Applicant belong to local community Applicant may be allowed for construction.*
>
> ....
>
> *Now, the Applicant has submitted revised plans in respect of ground floor on the existing plinth.*
>
> *Area of Plinth = 193.48 sq. m.*
> *Proposed Ground floor area = 193.48 sq.m.*
>
> ***Decision:** The Authority noted that the Applicant has now submitted revised plans only in respect to the ground floor by maintaining the existing plinth....."*

Similar notings have been made in the said Minutes in respect of Case No. 4.3 pertaining to House No. 438 *(@ Pg.183)*. As such, the claim of Respondent

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ Appt. By Govt. of India Regd. No. 16971 Area Delhi/NCR Dist. Whole India

Asset Reconstruction Company Limited A-2/0 (F.F.) (S.F.) Defence Colony New Delhi

No. 2 that structure of 1053 sq. mtrs. existed prior to 1991 is false and self-serving. It is also pertinent to state herein that apart from the application of the Respondent No.2 and the permission obtained by him, being for the re-construction of the residential houses, the above referred minutes of GCZMA, as well as the Site Inspection Report of the Expert Member also clearly indicate the usage of the existing structures as residential.

12. That, the contents of Para 12 are wrong and incorrect hence denied. The submission made by the Respondent No. 2 are without any basis and are only surmises and conjectures. However, for the sake of record, it is submitted that the order under challenged is appealable only before this Hon'ble Tribunal under Section 16(g) of the NGT Act and thus, this Hon'ble Tribunal has sufficient jurisdiction to adjudicate the present Appeal. Had it remotely been the intention of the Appellant to (allegedly) misuse the jurisdiction of this Hon'ble

Tribunal, it would not have filed a separate Civil Suit to agitate the civil disputes.

13. That, the contents of Para 13 in so far as it relates to Appellant filing SCS/62/2024 before the Court of Civil Judge, Senior Division, Margao, Goa, being a matter of record, need no reply. However, remaining contents are denied being incorrect. It is also submitted that the pendency of SCS/62/2024 in no manner interferes with and/or obstructs the jurisdiction of this Hon'ble Tribunal to try and adjudicate the present statutory Appeal.

14-15. That, the contents of Paras 14 and 15 are wrong and incorrect hence denied. It is submitted that the issues raised in the OA, as well as the present Appeal, arise out of environmental issues and apprehended damage to the environment of Agonda beach. Furthermore, apart from the environmental issues raised by the Appellant in the present Appeal, the statements made therein only serve to bring out the factual context.

16. That, the contents of Para 16 are wrong and incorrect hence denied. It is submitted that the Appellant herein

NOTARY PUBLIC ★ MINNATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India

was the Original Applicant to OA/15/2023, which was disposed of by this Hon'ble Tribunal *vide* Judgment dated 03.01.2024, wherefrom remand proceedings before the Respondent No. 1 Authority were instituted and the Appellant was given an opportunity of oral and written representation. Thereafter, the impugned order has also been specifically copied to the Appellant, thereby making it a party having sufficient locus to file the present Appeal.

17. That, the contents of Para 17 are matter of record, needs no reply.

18-19. That, the contents of Paras 18 and 19 are wrong and incorrect hence denied. It is submitted that the relief(s) sought by the Appellant in the present Appeal *vis-à-vis* the relief(s) sought in the SCS/62/2024 are completely independent of each other. Moreover, the scope and jurisdiction in which the said cases have been filed are distinct and not over lapping. The only common prayer in the SCS/62/2024 (i.e. Prayer D) and in the present Appeal (i.e. Prayer B) are mere consequential prayers

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 16971 Area Delhi/NCR J-U/S Exld. Whole India

which are wholly dependent upon the grant of the main Prayer(s) which are distinct and independent. It is submitted that the submissions made by the Respondent No. 2 are completely baseless and contrary to law.

20-22. That, the contents of Paras 20 to 22 are wrong and incorrect hence denied. It is submitted that the submissions made by the Respondent No. 2 are completely misplaced and require no interference by this Hon'ble Tribunal. The purported letter dated 12.06.2019 annexed by the Respondent No. 2 as Annexure R-5 is a letter issued by the then Resolution Professional of DPDCL and not by the Appellant. It is submitted that the (then) RP of DPDCL has mentioned about encroachments over land comprising over 70 survey numbers, including Survey No. 100/10 and there is no reference to any specific construction / encroachment on the said Survey No. 100/10. Moreover, it is pertinent to state that as per the public stand of the lessee of the Respondent No.2, the construction of impugned structure began only in the month of December 2020, and

NOTARY PUBLIC MINATI RANI MOHAPATRA App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India

commercial operation whereof commenced w.e.f. December 2022. In this regard the submission of the Respondent No.2 that development and re-constructions were being carried out in the year 2018-19 is wholly incorrect and belied by the information available in the public domain.

23. That, the contents of Para 23 merit no reply.

24-28. That, the contents of Paras 24 to 28 are wrong and incorrect hence denied. It is submitted that the purported House Nos. 438 & 439 in Village Agonda, Canacona, Goa, are situated in Survey No. 100/10, which survey admeasures 5350 sq. mts. in *toto*. It is submitted that even though land / title issues are not relevant for the purposes of the present Appeal, it is pertinent to bring to the notice of this Hon'ble Tribunal that till date the Respondent No. 2 has failed to bring on record the documents based on which his purported title in Survey No. 100/10 may be established. Mere statements, unsupported by documentary evidence, are liable to be ignored by this Hon'ble Tribunal.

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris. Extd. Whole India

It is further submitted that the purported plinth of House No. 438 being 338 sq. mts. and that of house no. 439 being 465 sq. mts. is completely contrary to the registered Sale Deed dated 28.06.1982, and also contrary to ISLR Map. Pertinent to state that this claim of the Respondent No. 2 is also contrary to the Schedule to the lease deed dated 23.09.2020 *(@ Pg. 271 to 317)* entered into between Respondent No. 2, his wife Mrs. Conceicao Fernandes and Mr. Vijay Gokuldas Komarpant, which, reads as under:

"SCHEDULE-I

(DESCRIPTION OF THE SAID HOUSES)

All those two structures which are constructed on part of all that landed property known as "VAL" situated at Val, within the jurisdiction of the Village Panchayat Agonda, Taluka and Sub-District of Canacona, District of South Goa, state of Goa, which is not described in the Land registration office of Quepem nor enrolled in taluka revenue office of Canacona but surveyed under survey no. 100/10 of Village Agonda of Canacona Taluka, and said houses are registered in the House Tax assessment register of the Village Panchayat of Agonda under H. No: 438 and 439 having an area admeasuring 193 sq. mts. and 193 sq. mts. respectively and a Well between them and both the houses alongwith 100 square

NOTARY PUBLIC ★ NINNATI RANI MOHAPATRA ★ Appt. By Govt. Of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India

Alchemist Asset Reconstruction Company Ltd. A-2/0 (F.F.) (S.F.) Defence Colony New Delhi

meters share are collectively bound on four sides as under:-

On the West:-	*Beach land bearing Survey No: 151*
On the East:-	*property bearing Survey No: 100/11 and & also katcha road access which*
On the North:-	*Property bearing Survey No: 100/8*
On the South:-	*Property bearing Survey No: 100/12 and 100/13"*

It is submitted that documents like House Tax Receipts, NoCs etc. do not qualify as documents evidencing ownership and /or title. In fact, the reliance upon and a concocted document being Excise License dated 11.11.1996 *(which was only for a period of approx. 4 ½ months)*, issued much after 1991, does not help the claim of the Respondent No. 2 in any manner to establish that commercial activity was in operation before 1991. The Appellant has already made detailed submission in the captioned Appeal regarding the Panchayat NoCs dated 09.05.1984 and 30.03.1985 being forged and fabricated in all likelihood, which submissions may kindly be read as part and parcel to the

present Paragraph as the contents whereof are not being repeated for the sake of brevity.

It is further submitted that a purported possession of property beyond the area entitled to, in no manner constitutes a lawful possession. Consequently, passing on of a right and interest in the property to a lessee, which right and interest the lessor did not possess, results in the lessee also being in a wrongful possession.

29. That, the contents of Para 29 merit no reply, though the veracity and the genuineness of documents at sub-paras (a) to (i) are seriously disputed. It is submitted that juxtaposed to the copy of Application of the Respondent No.2, alongwith documents, as received by the Appellant from the office of GCZMA under RTI, it is pertinent to note that the documents as mentioned at sub-paras (b), (c), (d), (f), (g), (h) and (i) were not submitted in support of his Application before the GCZMA in the year 2016 and all such documents have surfaced at a much later stage i.e. only in the year 2023.

NOTARY PUBLIC MANJUSHREE RANI MOHAPATRA Appt. By Govt. of India Regd. No. 16971 Area Delhi/NCR Jurisdiction Whole India

Alchemist Asset Reconstruction Company Limited A-2/10 (F.F.) (S.F.) Defence Colony New Delhi

30. That, the contents of Para 30 are wrong and incorrect hence denied. It is submitted that as per law, the contents of a registered document are presumed to be genuine; and the onus to prove otherwise is on person who challenges it. In the instant case, the Appellant has submitted that DPDCL is the lawful owner of 5300 sq. mts. of land in Survey No. 100/10 by virtue of a registered sale deed dated 28.06.1982, which sale deed, as per the information with the Appellant, has not been challenged by the Respondent No. 2 till date.

31. That, the contents of Para 31 are wrong and misleading hence denied. It is submitted that the Respondent No. 2 applied to Respondent No. 1 not as a fisherman or fisherfolk, but took advantage for being a member of the traditional / local community. To buttress the same, it is pertinent to take note of the relevant extract of Regulation 8 (1) III A (ii) of CRZ, 2011, which reads as under:

> *".....Construction/reconstruction of dwelling units of traditional coastal communities including fisherfolk may be permitted between 100*

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India

> *and 200 metres from the HTL along the seafront in accordance with a comprehensive plan prepared by the State Government or the Union territory in consultation with the traditional coastal communities including fisherfolk and incorporating the necessary disaster management provision, sanitation and recommend*

As may be seen, the Regulation in question applies to all traditional coastal communities including fisherfolk and not only to "fisherfolk" and, as per records, the Respondent No. 2 has taken advantage of the said Regulation by claiming to be toddy tapper.

It is further clarified that, the 2016 Application of the Respondent No. 2 seeking permission for repairs/ renovations for reconstruction of existing house was indeed supported by a Certificate dated 06.07.2010 *(at pg. 172)* issued by the *All Goa Toddy Tappers Association* thereby certifying that Mr. Selso A.P. Fernandes belongs to the *CHRISTIAN RENDERS COMMUNITY / CLASS* which is recognized as *OTHER BACKWARD CLASS* for the State of Goa. It is further submitted that the aspect of Respondent No. 2 belonging to the *Toddy Tappers Community* also finds a mention in

the Minutes of 137th and 144th meetings of the GCZMA held on 24.01.2017 and 21.03.2017, respectively.

In pursuance of the above, the Appellant submits that in the present case since the Application of Respondent No. 2 to seek a permission for reconstruction of existing house was premised upon him belonging to a traditional Toddy Tapper Community, the same was considered by the GCZMA, wherein it was recorded in the 137th and 144th meeting of the GCZMA, as under:

137th MoM

".....And a copy of Certificate issued by the Toddy Tapers Association stating that Mr. Selo Fernandes, S/o Late Mr. Pedro Fernandes and Maria Fernandes belongs to the "Christian Renders" Community / Class which is recognized as OBC."

".....The applicant belongs to a toddy tappers community, certificate is enclosed to the file."

144th MoM

".....And a copy of Certificate issued by the Toddy Tapers Association stating that Mr. Selo Fernandes, S/o Late Mr. Pedro Fernandes and Maria Fernandes belongs to the "Christian Renders" Community / Class which is recognized as OBC."

"..... Since the Applicant belong to local Community Applicant may be allowed for construction."

Furthermore, after the rejection of its earlier application, the Respondent No. 2 reiterated its stand of belonging to a traditional community *vide* its another letter(s) *(inwarded on 14.03.2017)* to GCZMA a letter confirming that the Respondent No.2 is from a traditional toddy tapper community. the relevant extract of letter(s) issued by Respondent No. 2 to the GCZMA (inwarded on 14.03.2017), are quoted as under:

To,
GCZMA
Porvorim – Goa

Ref: No. GCZMA/S/16-17/69/2372 Dated: 16/03/2017

Sub: Clearance for proposed reconstruction Hno 438 Bearing Survey no 100/10 Agonda village Canacona Taluka

Sir,

With reference with the above cited subject and decision taken by your authority in the 137th GCZMA meeting on 24th Jan 2017. I am here to submit that I am from the traditional toddy tapper community. And i am hereby submitting my new plans for only the ground floor.

NOTARY PUBLIC
Appt. By Govt. of India
Regd No. 16971
Valid Delhi/NCR
Whole India
TI RANI MOHAPATRA

Alchemist Asset Reconstruction Company Limited
A-21/1 (F.F.) (S.F.)
Defence Colony
New Delhi

Kindly oblige with the matter

Thanking You

Selso Fernandes

Moreover, even the site inspection report of the Expert Member (@Pg. 169-170; and @Pg. 188-189) also lists as follows:

> *"13. Any other information about the site that is relevant to the environment:*
>
> ...
>
> *(3). The applicant belong to a toddy tapper community certificate is enclosed to the file. Also during inspection it is observed that there two adjoining existing structure as indicated in the submitted plan and one of which is a wooden shed.*
>
> ...
>
> *(5). Since the applicant belong to local community- applications may be allowed in construction..."*

It is further submitted that in pursuance of the above, in the Permission(s) dated 04.04.2017 (now set aside), there rightly existed the following Condition no. 4:

> *4. The structure should not be used for commercial purpose and not to be sold or transferred to the non-traditional community."*

32. That, the contents of Para 32 are wrong and incorrect hence denied. It is submitted that the in terms of the captioned Appeal, as well as hereinabove, the Respondent No. 2 blatantly mis-utilized the permission dated 04.04.2017, which has been rightly set aside by this Hon'ble Tribunal.

33. In response to Para 33 it is submitted that the Approvals dated 04.04.2017 have been set aside by this Hon'ble Tribunal *vide* Judgment dated 03.01.2017, which though under Appeal, has not been stayed by the Hon'ble Supreme Court. Even before being set aside, the said Approvals dated 04.04.2017 permitted the Respondent No. 2 to reconstruct House Nos. 438 and 439 and not to erect a massive Commercial Resort.

34. That, the contents of Para 34 are wrong and misleading hence denied. It is submitted that the submissions made in the para under Reply are a clever *albeit* cunning afterthought as the words "structures" have now been used as opposed to the word "house" or "existing house", as clearly mentioned in the Approval dated

NOTARY PUBLIC MINATI RANI MOHAPATRA App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India

04.04.2017 or the terms "residential house" as used in the Site Inspection Report as quoted in Minutes of 137th and 144th meetings of GCZMA held on 24.01.2017 and 21.03.2017, respectively. The said attempt of the Respondent No. 2 is clearly mischievous with an intent to obfuscate the issues at hand.

35. That, the contents of Para 35 merit no reply. However, it is reiterated that the Approvals dated 04.04.2017 were issued only for reconstruction of existing house, with the condition that the structure should not be used for commercial purpose and not to be sold or transferred to the non-traditional community.

36. That, the contents of Para 36 are wrong, mischievous and misleading, hence denied. It is submitted that that the area of respective plinths mentioned in the Minutes of 144th meeting of GCZMA are as under:

House No. 438

Area of the Plinth = 217.60 sq. mts.

Proposed Ground Floor Area = 217.60 sq. mts.

House No. 439

Area of the Plinth = 193.48 sq. mts.

Proposed Ground Floor Area = 193.48 sq. mts.

However, despite the above areas of plinth being wrongly portrayed as existing on site, evidently, based upon the Joint Site Inspection Report dated 10.04.2023 (@Pg. 230-242), the plinth of structures found on site aggregated to 1160 sq. mts. Thus, clearly the Respondent No. 2 has constructed a Mammoth Resort by misusing the permission to reconstruct two houses, which can at best be aggregating 79 sq. mtrs. as per ISLR Report, though as per sale deed they cannot exceed 50 sq. mtrs. Therefore, it is a matter of fact that the Respondent No. 2 extended the plinths and erected a huge commercial structures instead of two residential houses to run the *Dream Discovery Resort* therefrom.

As already submitted above, the Respondent No. 2 is not entitled to an area exceeding 50 sq. mts. in Survey No. 100/10 and without admitting, even the ISLR Map shows the plinth of two houses of Respondent No. 2 as 79 sq. mts. cumulatively. Thus, any claim of the Respondent No. 2 as opposed to a registered sale deed

and/or contemporaneous govt. records is specifically and vehemently denied.

37. That, the contents of Para 37 are wrong and incorrect hence denied. It is submitted that though the Approvals dated 04.04.2017 (now set aside) were issued for reconstruction of house nos. 438 and 439, however, in reality the challenge to the said approvals was made by the Appellant in OA/15/2023 on account of the same being mis-utilized by way of construction of a huge commercial resort by a non-traditional community person to whom the site was transferred by way of a lease, which was directly in violation of Condition no. 4 of the said approvals.

38. That, the contents of Para 38 are wrong and incorrect hence denied. The permission was specifically for reconstruction of House Nos. 438 & 439 on the existing plinth areas measuring 217.60 Sq. mts. and 193.48 Sq mts., respectively.

39. That, the contents of Para 39 are wrong and incorrect hence denied. It is submitted that the present matter has

nothing to do with CRZ-II and the Respondent No. 2 is trying to confuse the issues. It is submitted that the approvals were given for reconstruction of houses situated in CRZ-III under Para 8 (i) III A (ii) of CRZ, 2011, which approvals were obtained by the Respondent No. 2 by suppressing his mischievous design of a commercial usage for which a lease deed had already been executed between Respondent No. 2 and his lessee on 12.09.2016 (i.e. even before the issuance of Permission(s) dated 04.04.2017).

40. That, the contents of Para 40 are wrong and incorrect hence denied. It is submitted that the Respondent No. 2 is attempting to obfuscate issues. It is submitted that the Condition no. 4 was rightfully placed in the Approvals dated 04.04.2017 (now set aside) as the same had been granted by the GCZMA in favour of Respondent No. 2 on the account of him belonging to a traditional community. Moreover, there is absolutely no documentary evidence furnished by the Respondent No. 2 on record to prove the alleged commercial usage of

NOTARY PUBLIC MINATI RANI MOHAPATRA App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Jurisdiction Extd. Whole India

structures prior to 1991. The only document that has been placed on record is a licence issued by the Department of Excise (@Pg. 521) being valid from 11.11.1996 to 31.03.1997 for (4 ½ months only), which does not come to the aid of the Respondent No. 2 in any manner. Furthermore, without prejudice, it is submitted that the purported No Objection Certificate (concocted document) of the Village Panchayat dated 17.01.1991 is merely an enabling permission which does not in any manner prove that the said premises were being used commercially.

41. That, the contents of Para 41 are wrong and incorrect hence denied. The purported Excise License dated 11.11.1996 for only a period of approx. 4 ½ months is no proof of continued commercial usage as claimed by the Respondent No. 2. In regard to the above, the submissions made by the Respondent No. 2 are refuted vehemently.

42. That, the contents of Para 42 are wrong and misleading, hence denied. The Respondent No.2 is not referring to

the entire Regulation and is trying to take shelter under the first part of Regulation 8 (i) III (A) (ii) of CRZ 2011, whereas, it is a matter of record that the Respondent No.2's Application was considered and approved by the GCZMA under the second part of the said Regulation. It is submitted that while the first part of the said Regulation prohibits the construction within NDZ area except for repairs or reconstruction of existing authorized structure, the second part of the said Regulation clearly applies to construction / reconstruction of dwelling units of traditional coastal communities between 100 & 200 mts. of HTL.

43. That, the contents of Para 43 merit no reply.

44. That, the contents of Para 44 merit no reply. However, it is submitted that the permissions sought for and granted *vide* Approvals dated 04.04.2017 were for existing houses and not for any alleged "authorized structures" or for commercial use.

45. That, the contents of Para 45 are wrong and incorrect hence denied. It is submitted that the Condition no. 4

was rightfully placed in the Approvals dated 04.04.2017 (now set aside) as the same had been granted by the GCZMA in favour of Respondent No. 2 on the account of him belonging to a traditional coastal community. The remaining submissions have been made with a *malafide* intent to confuse this Hon'ble Tribunal.

46. That, the contents of Para 46 are wrong and incorrect hence denied. It is submitted that no documents whatsoever have been filed by the Respondent No. 2 to prove alleged commercial usage prior to February 1991. Moreover, the principle violation held against Respondent No. 2 in Judgment dated 03.01.2024 was the unlawful transfer of benefits under the Approvals dated 04.04.2017 to his lessee for constructing, operating and running a full-fledged commercial resort with permanent construction, which lessee otherwise has no requisite permission from the GCZMA.

47. That, the contents of Para 47 are wrong and incorrect hence denied. Had the so-called structures been used for commercial purpose, the Expert Member of GCZMA

would have described them as such in the Site Inspection Report and not as "Residential House". The submissions made hereinabove may kindly be read as part and parcel to the present Para, as the contents are not being repeated for the sake of brevity.

48. That, the contents of Para 48 merit no reply.

49. That, the contents of Para 49 are wrong and incorrect hence denied. The submissions made in captioned Appeal as well as hereinabove may kindly be read as part and parcel to the present Para, as the contents are not being repeated for the sake of brevity.

50. That, the contents of Para 50 are wrong and incorrect hence denied. It is submitted that neither the record held by GCZMA nor the Google Earth Images support the Respondent No. 2's contention. A fresh record has been created (which was not submitted at the time of submitting the application for reconstruction of houses) to build a false and misleading narrative. Without prejudice to the above, it is submitted that the principal violation held against Respondent No. 2 in Judgment

dated 03.01.2024 was the unlawful transfer of benefits under the Approvals dated 04.04.2017 to his lessee for constructing, operating and running a full-fledged commercial resort with permanent construction, which lessee otherwise has no requisite permission from the GCZMA. Furthermore, as established in OA/15/2023, the lessee of Respondent No. 2 started his construction of the illegal and unlawful commercial resort in the month of December 2020 and commercial operations thereof commenced from December 2022. Thus, the purported existence of the two houses being prior to 1991 have no relevance to the present case, moreover when the Appellant has specifically refuted the existence of such houses in the backdrop of the area of land being available to the Respondent No. 2 *vis-à-vis* the registered sale deed dated 28.06.1982 and the ISLR Map.

51. That, the contents of Para 51 are wrong and mischievous, hence, denied.

52. That, the contents of Para 52 are wrong and incorrect hence denied, however, it is submitted that as per the

GCZMA Joint Site Inspection Report dated 10.04.2023 (@Pg. 230-231; relevant @Pg. 242) itself, the proximity of structures on site from HTL are mostly within 50 mts. of HTL (and some smaller structures between 50-100 mts. of HTL), as evident upon perusal of the site plan annexed to the Site Inspection Report.

53. That, the contents of Para 53 are wrong and incorrect hence denied. It is submitted that the records of GCZMA leave no room for doubt that permission was sought and given for reconstruction of two houses to a member of the local community. Furthermore, it is also submitted that mere payment of house tax in no manner constitutes either ownership and /or possession.

54. That, the contents of Para 54 are wrong and incorrect hence denied. It is submitted that for the first time the Respondent No. 2 has raised this present defence so as to wriggle out of the barriers of law. It is submitted that the Respondent No. 2 be restrained from making such baseless submissions which are neither borne out of any record nor were never made in OA/15/2023.

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Dist. Extd. Whole India

Asset Reconstruction Company Limited A-10 (F.F.) (S.F.) Defence Colony New Delhi

55. That, the contents of Para 55 are wrong and incorrect hence denied. It is reiterated that there were no plans / maps annexed to the impugned order, as alleged and the reliance placed by GCZMA in the purported NoCs dated 17.01.1991, 09.05.1984 and 30.03.1985 are specifically and vehemently refuted. It is submitted that the NoCs dated 09.05.1984 and 30.03.1985 were never in existence or filed at any stage in 2016 when the Respondent No. 2 filed Application for reconstruction of house without mentioning the area. However, the GCZMA in connivance with Respondent No. 2 gave permission to reconstruct two houses admeasuring 217.60 sq. mts. and 193 sq. mts. (aggregating 411 sq. mts.). It is also submitted that the Google Earth Images falsify the entire case of Respondent No. 2 that structures present on site were constructed prior to 1991. It is reiterated that the purported Panchayat NOCs were furnished by the Respondent No. 2 for the first time only at the time of Joint Site Inspection ordered by this Hon'ble Tribunal and the same attempts to be in line

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 16971 Area: Delhi/NCR Dist. Exld. Whole India

with the area of plinth occupied as present. It is beyond understanding as to why the purported Panchayat NOCs of the year 1984-85 were never originally produced by the Respondent No. 2 at the time of his application for reconstruction of houses in the year 2016 and that why and how such documents have suddenly emerged.

56. That, the contents of Para 56 are wrong and incorrect hence denied. It is submitted that the captioned Appeal raises a pertinent environmental issues to be adjudicated by this Hon'ble Tribunal under Section 16(g) of the NGT Act.

57. That, the contents of Para 57 are wrong and incorrect hence denied.

58. That, the contents of Para 58 are wrong and incorrect hence denied. It is submitted that the contents of captioned Appeal as well as the submission made herein may kindly be read as part and parcel to the present Rejoinder, as the contents whereof are not being repeated for brevity.

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Valid Extd. Whole India

Alchemist Asset Reconstruction Company Ltd. A-27/3 (F.F.) (S.F.) Defence Colony New Delhi

59. That, the contents of Para 59 are wrong and incorrect hence denied. It is submitted that the contents of captioned Appeal as well as the submission made herein may kindly be read as part and parcel to the present Rejoinder, as the contents whereof are not being repeated for brevity.

60. The prayer sought by the Respondent No. 2, in the given peculiar set of facts and circumstances of the present case, deserves to be rejected outrightly by this Hon'ble Tribunal, and correspondingly, the captioned Appeal deserves to be allowed by this Hon'ble Tribunal.

61. That the contents of Para 61 are denied.

62. I say that the contents of Paras A to X, and, Paras 1 to 59 and 60(p) are true to my knowledge, and the contents of Paras 60(p) are based on legal submissions which I believe to be true. The Exhibits annexed are true copies of the original.

NOTARY PUBLIC NOTARIAL NOTARY Minati Rani Mohapatra Delhi Regd. No.16971 SL.No.: GOVT. OF INDIA

IDENTIFIED

PLACE: New Delhi 08 JAN 2025
DATE: 08.01.2025

Appellant

Advocate for the Appellant

ATTESTED
MINATI RANI MOHAPATRA
NOTARY DELHI-R-16971
GOVERNMENT OF INDIA
SUPREME COURT OF INDIA
COMPOUND NEW DELHI
REGISTER Pg./Sl. No.

NOTARY PUBLIC ★ MINATI RANI MOHAPATRA ★ App. By Govt. of India Regd. No. 16971 Area Delhi/NCR Juris Extd. Whole India

ATTESTED
MINATI RANI MOHAPATRA
ADVOCATE (NOTARY)
Mob. No.: 8130128457

08 JAN 2025

Alchemist ARC

Registered Office:
A-270, 1st & 2nd Floor, Defence Colony, New Delhi-110 024
✆ 011-46562580-83 F/ 011-46562584
E-Mail : admin@alchemistarc.com
Website : www.alchemistarc.com
CIN : U74999DL2002PLC117052

Dated : 08.06.2022

To,

1. The Chairman
   Goa Coastal Zone Management Authority
   Panaji
   Goa

2. The Member Secretary
   Goa Coastal Zone Management Authority
   Panaji
   Goa

O/o Member Secretary 08/06/22
Goa Coastal Zone Management Authority
C/o Dir... of Environment & Climate Change
Dempo Tower 4th Floor
Patto Plaza Panjim Goa - 403001

Sub:- **ILLEGAL & UNAUTHORIZED CONSTRUCTION OF A TOURIST RESORT BY THE NAME "DREAM DISCOVERY" ON SURVEY NO.100/10, IN AGONDA VILLAGE, CANACONA TALUKA, GOA AND COMMERCIAL EXPLOITATION THEREOF**

Sir,

1. It is submitted that the undersigned is the authorised representative of Alchemist Asset Reconstruction Company (AARC) which is the Sole Mortgagee of 3,58,814 sq.mts. of land spread over 70 Survey Numbers viz. 93/1, 93/2, 94/1, 95/3, 95/5, 95/8, 95/9, 95/10, 95/13, 95/16, 96/1, 96/3, 96/6, 96/7, 96/8, 96/12, 96/14, 96/15, 96/16, 96/17, 96/18, 96/19, 96/20, 96/21, 96/22, 97/7, 97/8, 98/1, 98/2, 98/3, 98/4, 98/6, 98/7, 99/4, 99/5, 100/1, 100/3, 100/5, 100/6, 100/7, 100/8, 100/9, 100/10, 100/11, 100/12, 100/13, 100/14, 100/15, 100/16, 100/17, 101/1, 101/3, 101/6, 101/7, 101/8, 101/9, 101/14, 101/15, 101/16, 101/17, 101/18, 101/19, 101/20, 101/21, 101/22, 101/23, 101/24, 102/1, 102/3, 102/6, 102/7 and 105/4 situated in Village Agonda, Taluka Canacona, Goa including Survey No.100/10 on which the subject property has been unauthorizedly erected / constructed.

2. It is further submitted that the undersigned has already brought to the notice of this august Authority the fact of multiple encroachments and unauthorised constructions on the aforementioned survey numbers vide letter dated 18.04.2022.

3. It has now come to the notice of the undersigned that one Selso Fernandes of Agonda-Canacona has illegally and unauthorizedly constructed a Tourist Resort

True Copy

popularly known as "Dream Discovery" on Survey No.100/10, Village Agonda, Canacona which, as explained in para 1 above, stands mortgaged to the undersigned.

4. When the undersigned made enquiries, it has come to the knowledge that a Permission Letter No.GCZMA/S/16-17/69/34 dated 04.09.2017 has been issued by the GCZMA for reconstruction of House bearing No. 439, located in Survey No. 100/10 as well as a Tax Assessment / Calculation Order issued by the Town & Country Planning Department, Taluka Office Canacona – Goa No.TPC/CT/Agonda/100/10/17/429 dated 27.09.2017 for the said Residential Property House No.439 measuring 193.48 sq.mts. It is apparent that the said House has been converted into a Tourist Resort for Commercial Exploitation and also a much larger area has been occupied in the garb thereof without requisite permissions.

5. Also as per CRZ notification 2011, the beach at Agonda has been designated as turtle nesting site and protected under the Wildlife Protection Act, 1972 and no developmental activities are permitted in this area. Further in gross violation of the guidelines the construction carried out is of RCC and is a permanent construction which is evident from the photographs attached. Copy of photographs are annexed as **ANNEXURE – 1**.

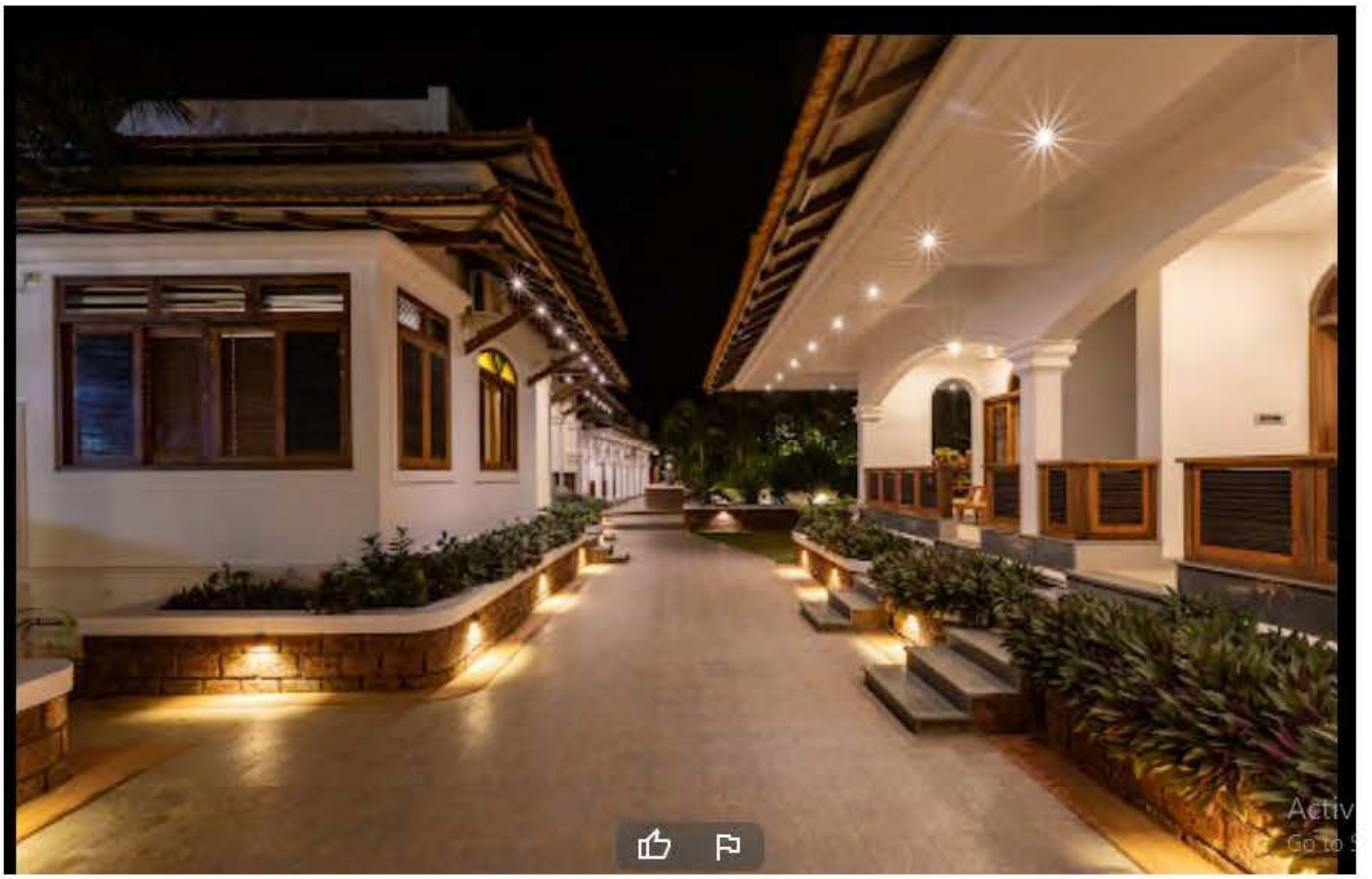
6. In view of the foregoing, it is requested that necessary action under law may kindly be taken forthwith against the offenders who have erected / constructed an unauthorized Tourist Resort on the land in Survey No.100/10, Village Agonda, Canacona Taluka, Goa and demolition order for the same should be passed.

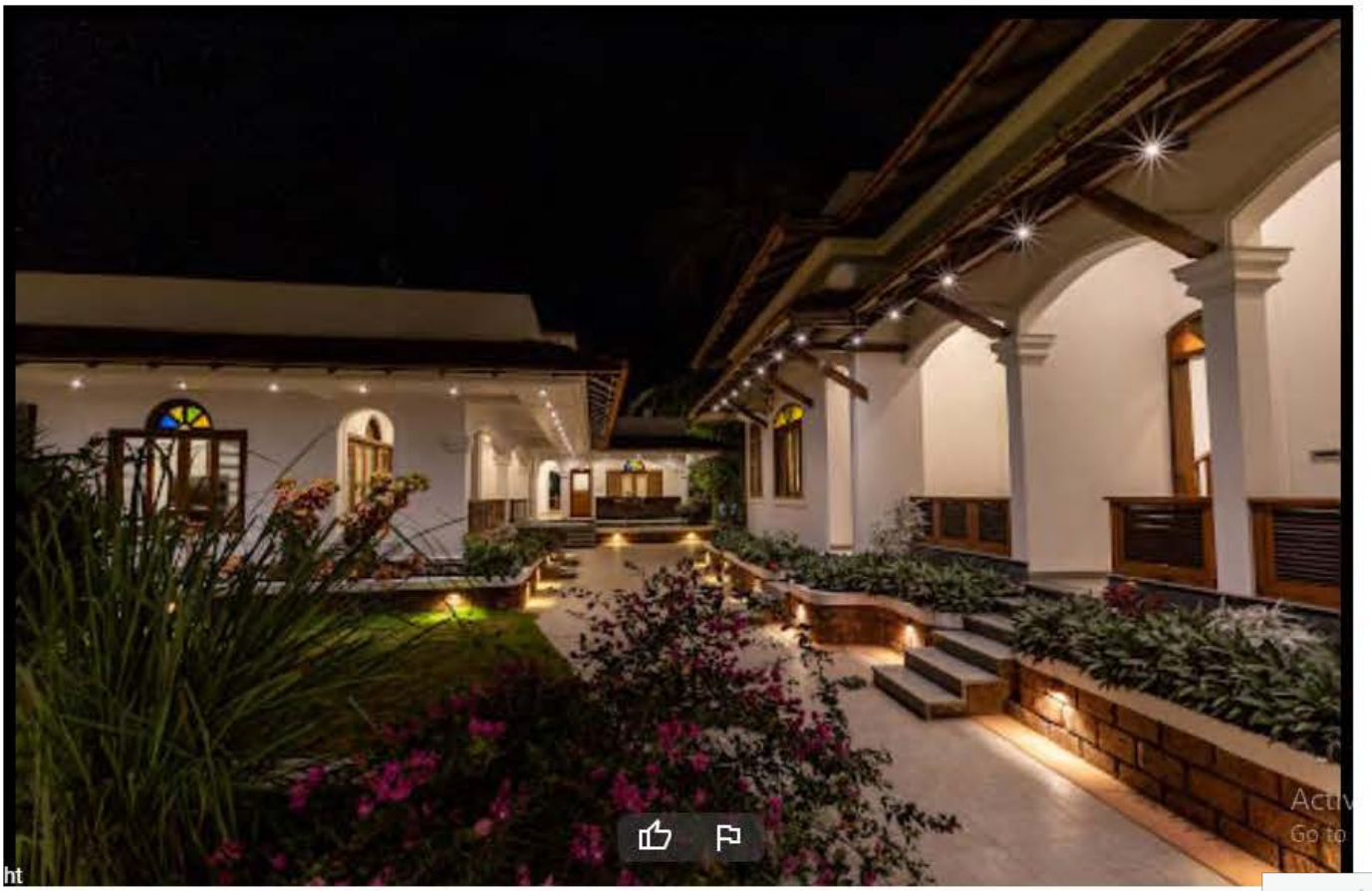
Yours faithfully,

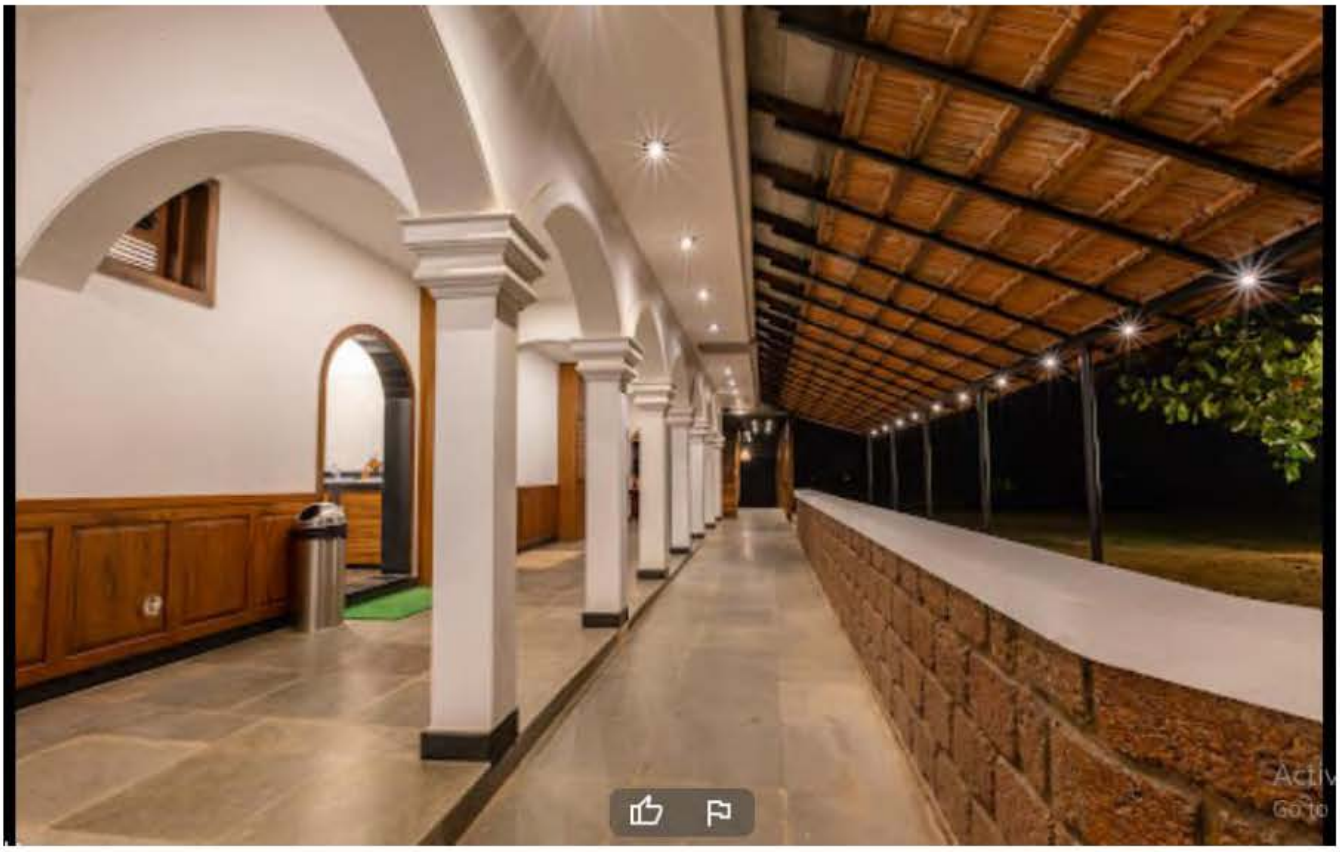
For Alchemist Asset Reconstruction Company Limited

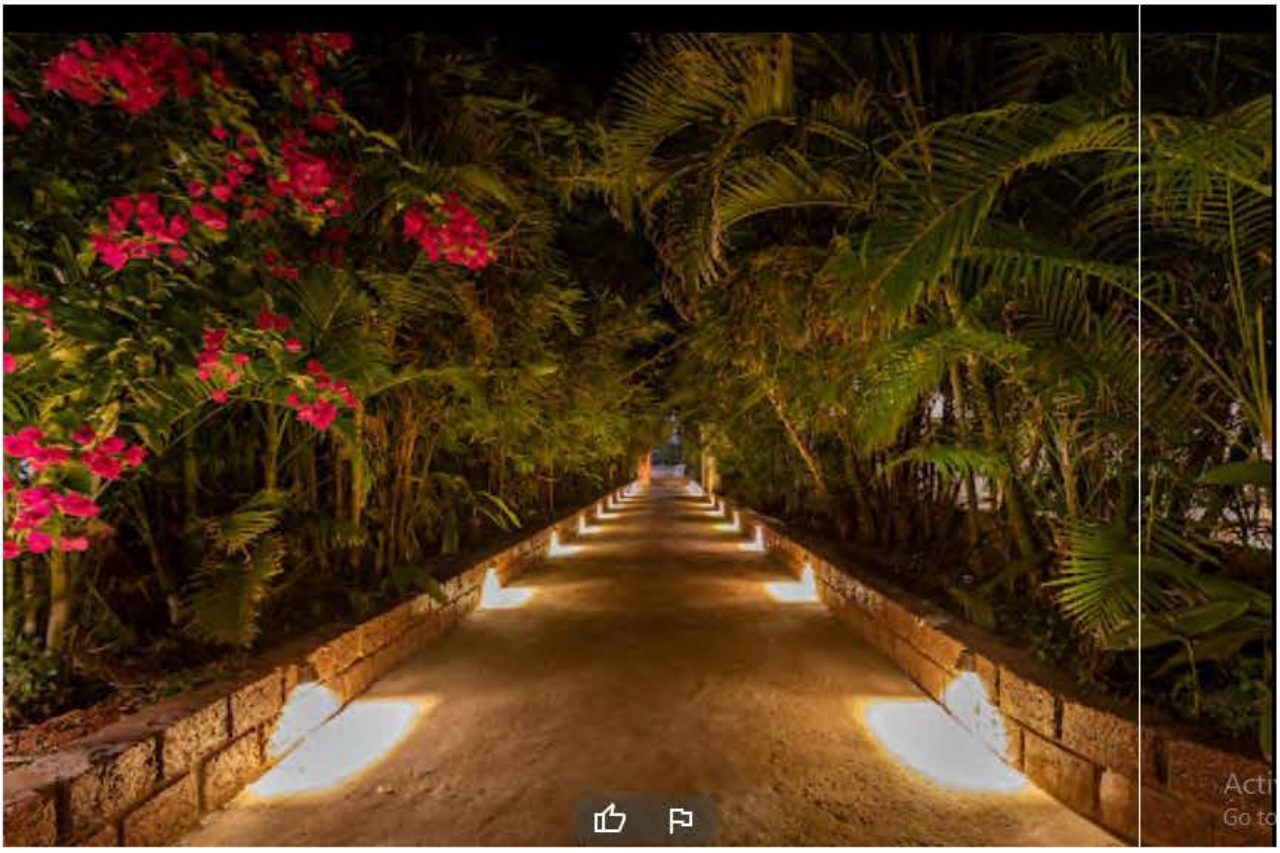
Akshat Sharma
[Authorised Signatory]

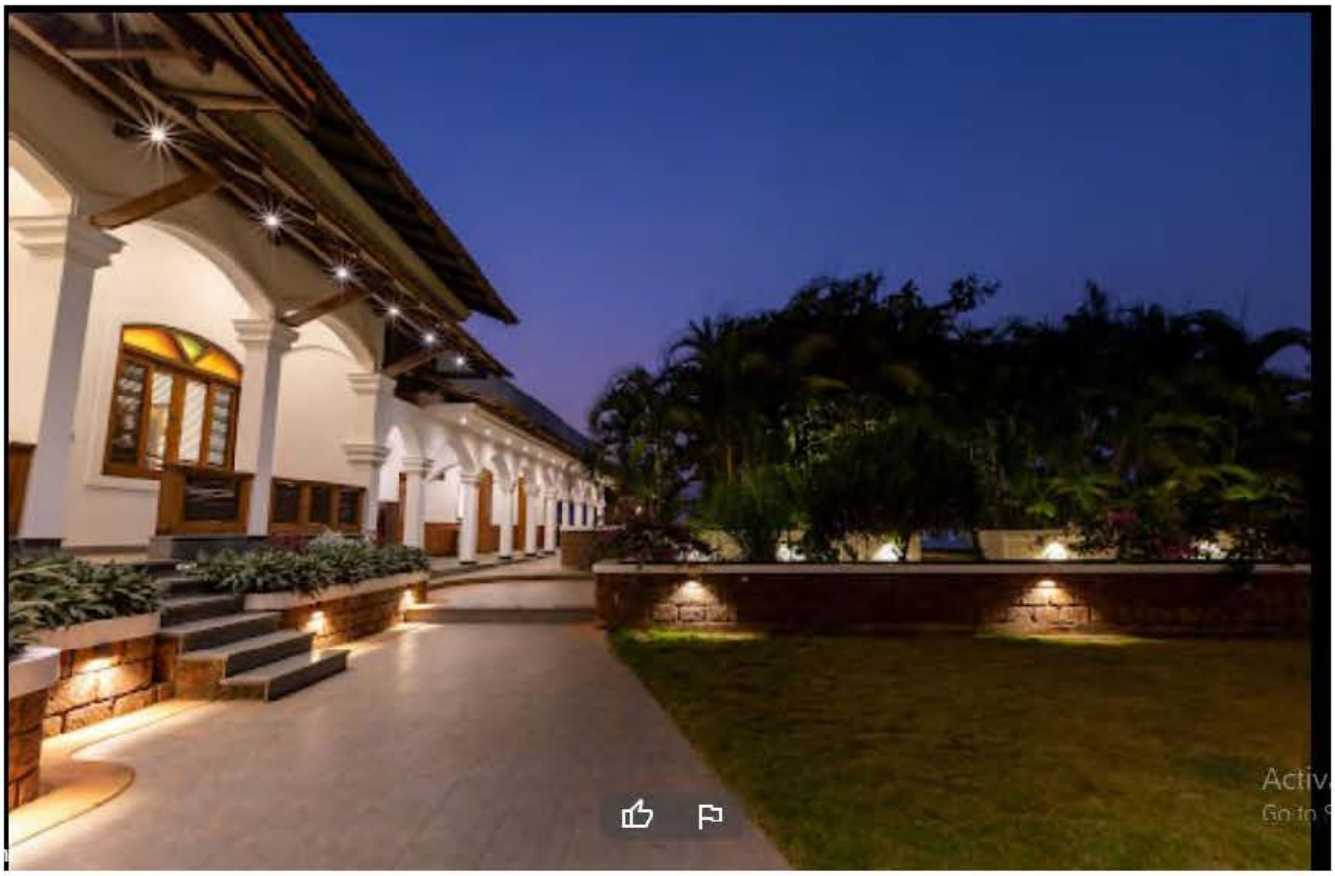
True Copy





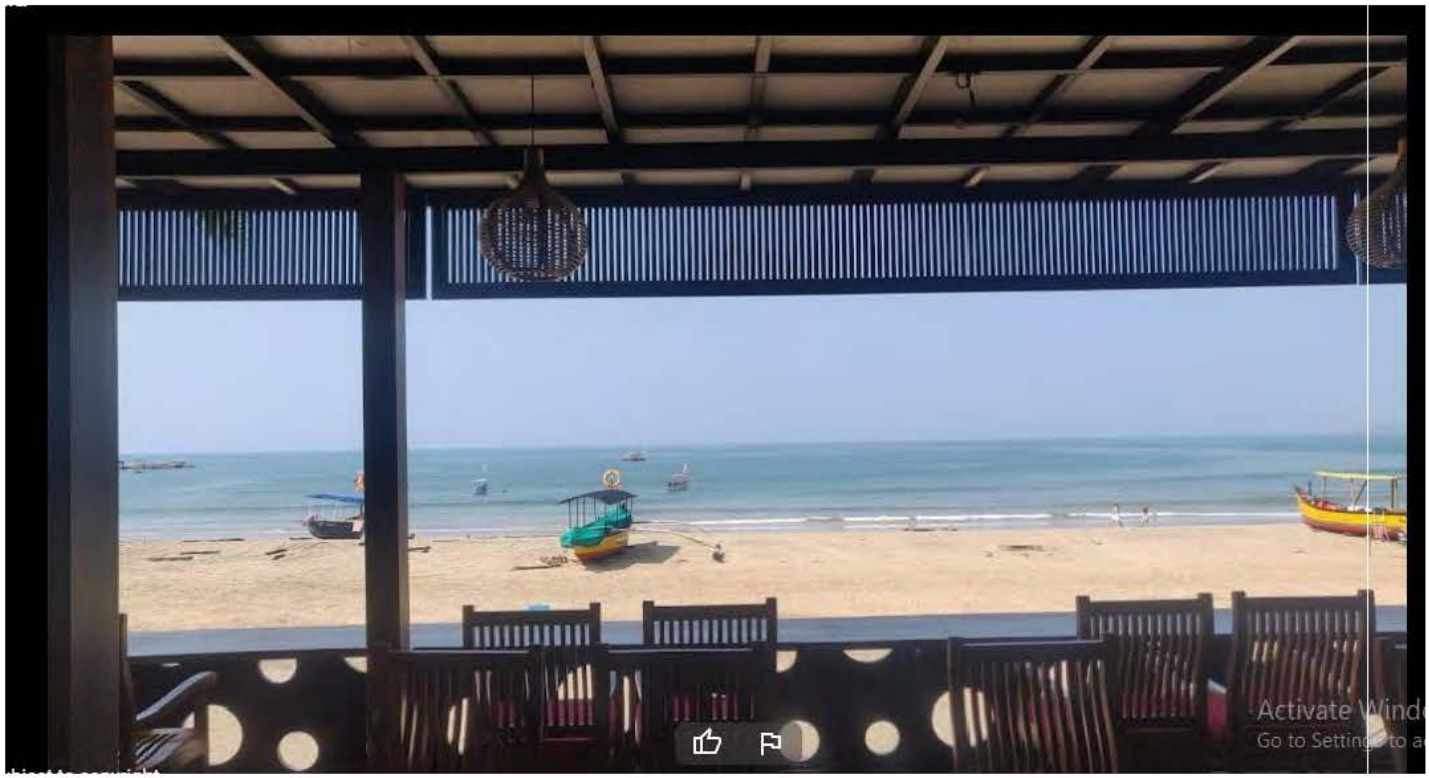


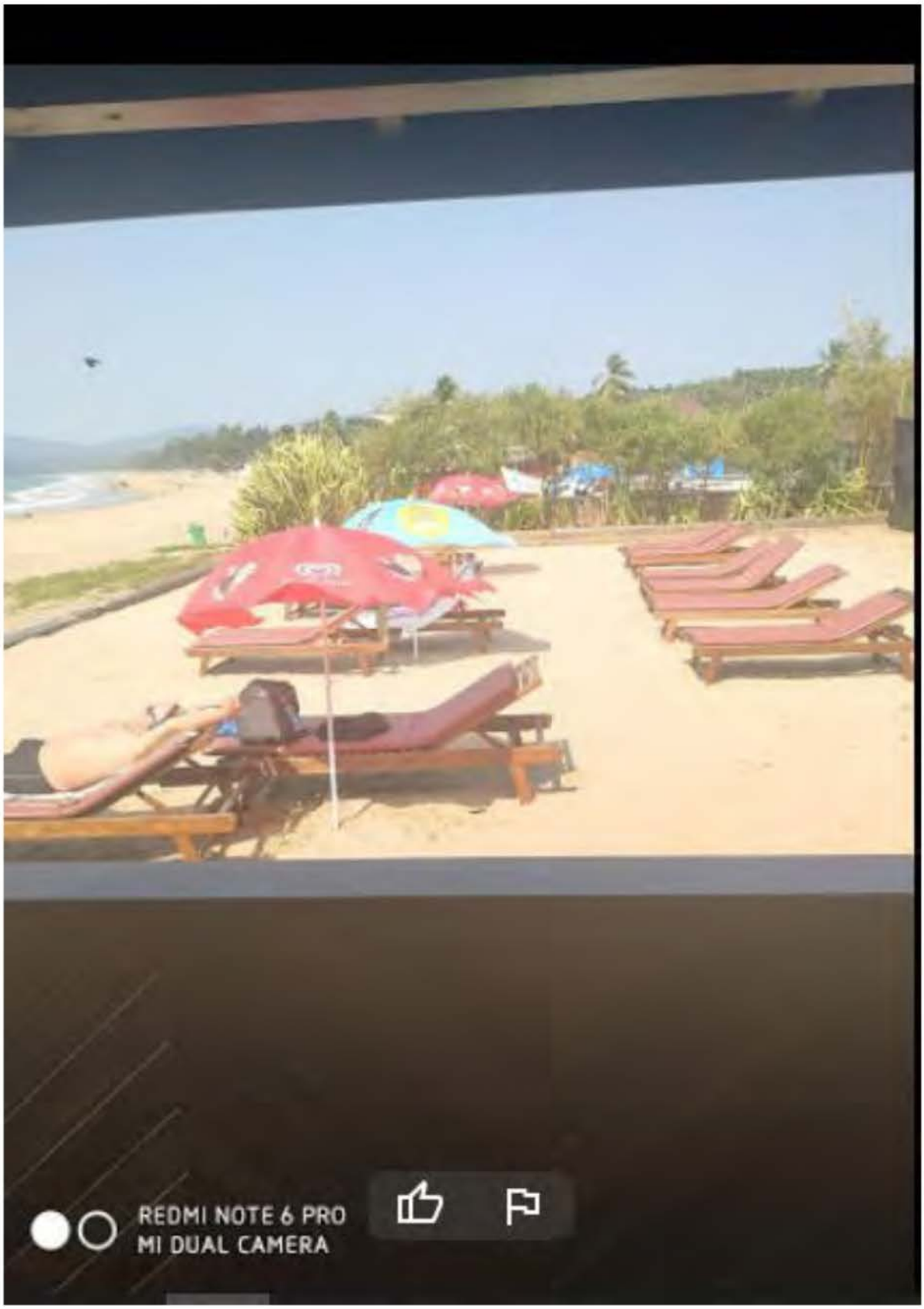





Shot on OnePlus


Activate Windows
Go to Settings to activate Windows.




REDMI NOTE 6 PRO
MI DUAL CAMERA

About Us

Finding Inspiration in Every Turn

Dream Discovery group is a registered company under Partnership Act of Govt Of India . Our Company is also recognised by Tourism Department , Govt. of Goa.We started a journey in December 2020 with Sea Facing beach cafe and then exactly after two years that is in December 2022 we opened as a full fledge resort . We are located right on the world famous Agonda Beach which is also known as Turtle Beach.Our moto is to cater world class service to our guest who will visit our resort for their holiday.Our Resort offers Five star category Accomodations mouth watering food in our sea facing beach cafe . For further details or enquiry please feel free to contact us through email ,phone call or whatsApp.