

BEFORE THE NATIONAL GREEN TRIBUNAL SITTING

AT PUNE

MEMORANDUM OF APPLICATION

(Under Section 18(1) read with Sections 14, 15 and 20 of the
National Green Tribunal Act, 2010)

Application No. 77 of 2023

Banda Nagaraj Kumar and Anr.)...Applicants


VERSUS

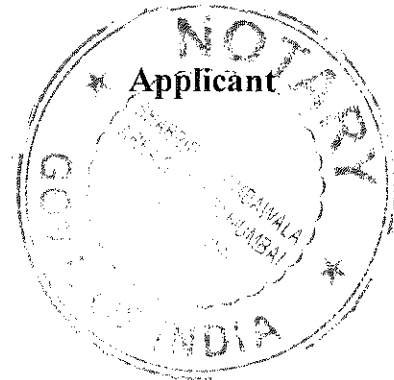
Maharashtra Maritime Board and Ors)...Respondents

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Through

FOR  **RONITA BHATTACHARYA**
Advocate for the Appellants
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BEFORE THE NATIONAL GREEN TRIBUNAL SITTING

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Application No. _____ of 2023

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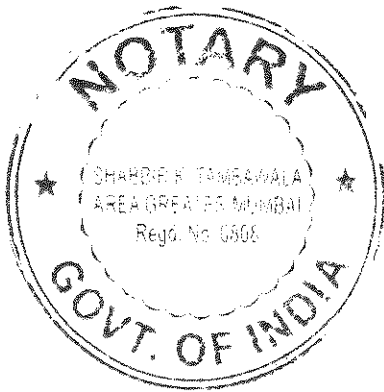
AFFIDAVIT IN REJOINDER ON BEHALF OF THE
APPLICANTS

I, Banda Nagaraj Kumar, Age 68 years residing at 501-Am,
Neelkanth Arcade, Plot 94, Sector-17 , Kopar Khairane, Navi
Mumbai 400709, the Applicant No. 1 herein, do hereby state on
solemn affirmation as follows:

1. I say that I am the Applicant No. 1 in the present Original
Application, OA No. 77 of 2023 and I have read the OA and
am familiar with its contents. I say that I have also read the

affidavit of the Respondent No. 1 dated 27.06.2023 (hereinafter referred to as the "Affidavit") and am familiar with its contents, thus I am competent to affirm and submit the present Affidavit in Rejoinder on behalf of the Applicants in the captioned matter

2. At the outset, I say that I am filing the present Affidavit in Rejoinder to counter the Affidavit in reply filed by the Respondent No.1. At the outset, I deny each and every averment, contention, allegation and/or submission made by the Respondent No. 1 in its Affidavit. Nothing should be deemed to have been admitted by me for lack of specific denial unless the same is specifically admitted by me hereinafter.



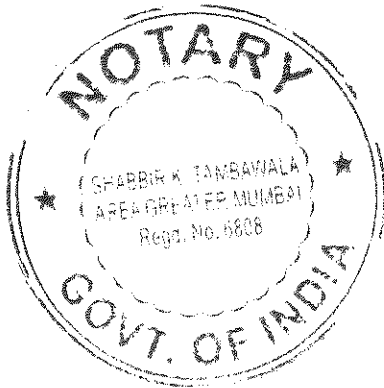
3. I say the Respondent No. 1, in its Affidavit has raised the following averments:
 - a. As a preliminary issue, the Respondent No. 1 has falsely claimed that:
 - i. the present Application is barred by limitation;
 - ii. the Respondent No. 1 has also stated that the Applicants have not challenged the CRZ clearance

granted to the project being executed by the Respondent No. 1, and has cited the same as a preliminary objection of the Respondent No. 1;

iii. the Respondent No.1 has incorrectly claimed that this Hon'ble Tribunal, vide another order passed in a different matter, namely OA 64 of 2021, has permitted a similar project.

b. On merits, the Respondent No. 1 has falsely claimed that:

- i. The project has received necessary clearances;
- ii. The project falls under the scope of permissible activities under the CRZ Notification of 2011 and 2019;
- iii. Various expert bodies have approved the project design.
- iv. The construction of the project is almost completed.

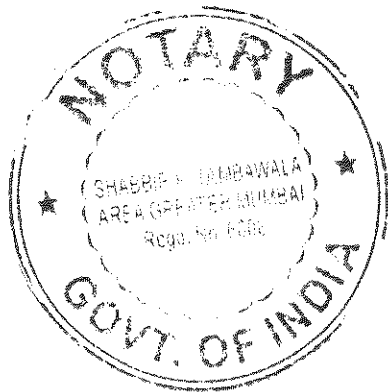


4. I say that the contents of paras 4 form part of the record and do not warrant any specific comment. I deny the averment of the Respondent at para 5 of the Affidavit that it is implementing the project in public interest, as the record in

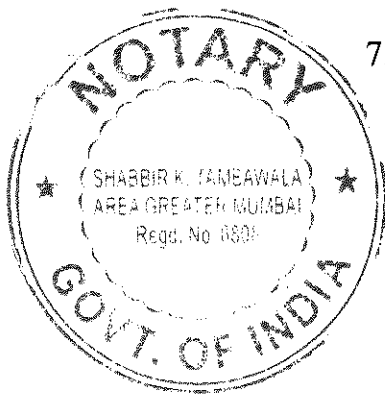
the present matter clearly demonstrates that the project is completely illegal and is in breach of the clearances granted to it thus far.

5. With regards to the preliminary objections raised by the Respondent No. 1, I say as follows:

6. I deny that the averments raised at para 7 and 8 of the affidavit that there is any delay on the part of the Applicants in filing the present Application. I say that the Applicants, across paras 32-36 and para 36 of the present Application have explained how it was awaiting the report of the Respondent MMB explaining to the Respondent MCZMA that its construction of the present project is in compliance with the permissions granted to it. I say that the said report was to be provided within 10 days of 10.03.2023, but was not provided to Applicants despite many written requests and reminders. I say that the letter dated 10.03.2023 of the Respondent No. 1 is annexed at Annexure A-19 of the Application and clearly records that it was marked to the Applicant no. 1. I say that it is noteworthy that the Respondent No. 1 has not denied in its Affidavit the fact that



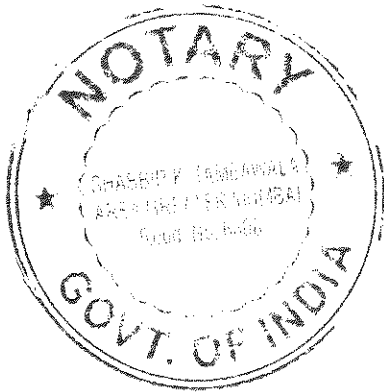
it was to prepare and provide the said report to the Applicants and the Respondent MCZMA, and has not produced a copy of the said report, if it was in fact ever prepared, to its affidavit. I say that the Applicant has sufficiently explained across paragraphs 32-36 and para 38 of the Application that it was awaiting the report of the Respondent No.1 prior to filing the present Application. I hereby adopt and reiterate the said averments and request that they be read as part of the present Affidavit.



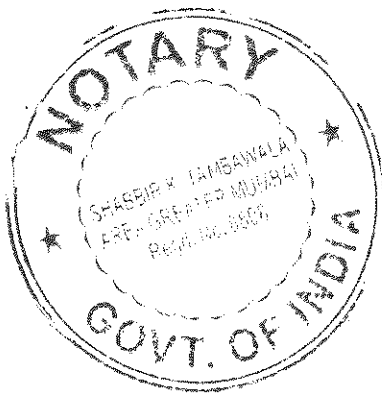
7. I deny that the averment at para 9 of the Affidavit that the Applicants are aggrieved merely by the grant of CRZ clearance to the present project and should have filed an Appeal instead of an Original Application under Section 14 as the Applicants have clearly illustrated in the present Application that the MCZMA while considering the proposal for the proposed project has categorically disallowed any construction on the beach. The Respondent MCZMA has only allowed some landscaping activities and activities permissible under the CRZ Notification, 2011. The extent of the construction being undertaken by the Respondent No. 1, particularly the construction of a road

directly upon the natural sandy beach has categorically been disallowed by the Respondent MCZMA. Therefore the Applicants herein are not seeking to challenge the CRZ clearances granted to the project, but have sought revocation of the CRZ clearances granted to the Respondent No. 1 on the grounds that the Respondent No. 1 has far exceeded, and egregiously breached the terms and conditions of the CRZ clearance granted to it.

8. Further, it is in fact evident that subsequent to the recommendation for the amendment to the CRZ clearance granted by the Respondent MCZMA on 30th June 2021 (Exhibit G page 540 of the Affidavit of the Respondent No. 1), no final CRZ clearance has been granted to the Respondent No. 1 by the SEIAA and it in fact is evident that the Respondent No. 1 has been illegally proceeding with the construction for the project without a CRZ clearance. It is submitted that this issue was specifically pointed out to the Hon'ble NGT during the last hearing of the matter on 03.07.2023, and the Respondent No. 1 did not deny the same. The Respondent no. 1 in fact sought time to take instructions on the said issue, and has not brought on record, till date, any



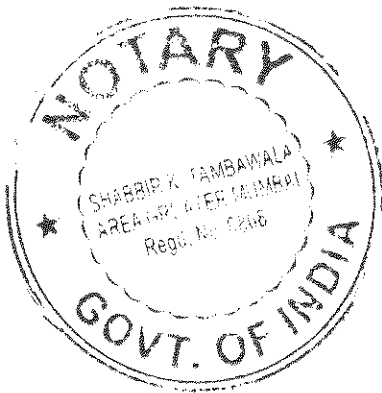
final CRZ clearance which permits the Respondent to construct the road and sea wall/”beautify “and develop Aksa Beach in the way that the Respondent is seeking to do. I say that on this count alone, the construction work of the Respondent no. 1 must be stayed by this Hon’ble Tribunal forthwith, and heavy costs must be imposed on the Respondent no. 1 for illegally proceeding with the construction without the final amended CRZ clearance. The fact that the amended CRZ clearance has not been granted to the project is evident from the fact that the grant of the clearance of the project was discussed at agenda item 16 of the 168th meeting of the MCZMA dated 10.08.2023. I say that the minutes of the said MCZMA meeting have not yet been uploaded on the website of the MCZMA, but a copy of the Agenda of the 168th meeting has been annexed hereto and marked as **Annexure A-1**. The Applicants categorically say that the CRZ clearance granted to the project on 05.03.2019 (at Exhibit G page 540 of the Affidavit of the Respondent No. 1) does not permit the nature of the construction being undertaken by the Respondent No. 1 on Aksa Beach.



9. With reference to para 10 of the Affidavit, I say that the sea wall being constructed by the PWD at Versova Beach has been stayed by the Supreme Court by its order dated 29.08.2023 which has been passed in O.A. No. 64 of 2021 (WZ) against orders dated 23.05.2023 and 17.07.2023 in Review Application No. 04 of 2023 (WZ) in O.A. No. 64 of 2021, and status quo has been directed to be maintained. Next date of hearing is on 7th November, 2023.

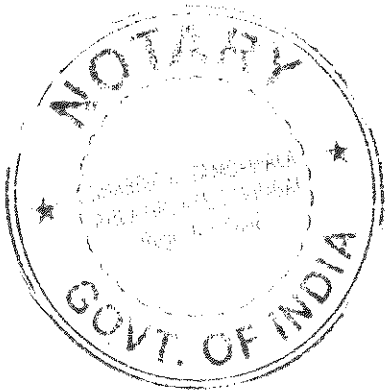
AVERMENTS ON MERITS

10. With regards to the averments of the Respondent No. 1 on merits, I categorically deny each of the said averments and further deny the statement at para 11 that the Applicants have *"failed to make a cogent case"* in its Application.



11. I deny that the present project has received all necessary clearances as contended across paras 12-17 of the Affidavit of the Respondent. At the cost of being repetitive, I say that not only is the project not being constructed in accordance with the recommendations of the MCZMA, nor the

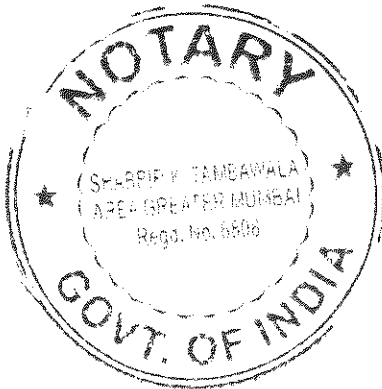
provisions of the CRZ clearance dated 05.03.2019, I say that the Respondent No. 1 has till date not even been granted an amended CRZ clearance for the project. I repeat and reiterate my submissions that the Respondent No. 1 has very evidently exceeded and breached the conditions imposed by the Respondent MCZMA and Respondent SEIAA to the proposed project vide its recommendations and amended CRZ clearance, but also repeat that the Respondent No. 1 has not obtained an amended CRZ clearance from the SEIAA and has been illegally constructing a road on top of the beach without any such permission enabling it to do so. I further deny that the recommendation of the Respondent no.2 for the amendment of the CRZ clearance amounts to the grant of an amended CRZ clearance as contended at para 16 of the affidavit by the Respondent No. 1.



12. With regards to the averments across paras 17-19 of the Affidavit of the Respondent, I categorically deny that the beautification and development of a beach is a permissible activity under either of the CRZ Notifications of 2011 and 2019. I say that there is no provision of either Notification which permits a motorable road, complete with benches, to

be constructed on beaches on sand dunes which are CRZ-1A areas. Neither is the construction of concrete seawalls mentioned as a permissible activity in the CRZ Notification. Instead the CRZ notification only permits “bundling” and erosion control techniques.

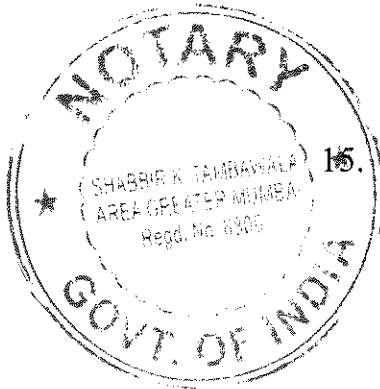
13. I say that the Respondent No. 1 is wrongfully pretending to pass off the present project as being one for preventing erosion of the beach, whereas actually it is a project for the so-called beautification and commercial development of the beach, which is evident from the proposal for the project submitted by the Respondent no. 1 (as reflected in the agenda items titles of the MCZMA minutes when the present project was being considered) as well as the admission made by the Respondent No. 1 at para 13 of its affidavit.



14. With regards to the reports of the CWPRS and IIT Bombay at paras 20-23 of the Affidavit, I further say that the statements made within the report prepared by IIT Bombay at page 547 of the Affidavit shows that:
- a. The beach is found to be “marginally eroding”;

- b. the beach is found to be very "plat" [sic: flat] unlike other locations where its protected by dunes.

Accordingly, I humbly submit that the above mentioned observations show that the said portion of Aksa Beach would actually be suitable for beach nourishment as an erosion control technique instead of the construction of a concrete seawall. I say that the said issue deserves to be examined by this Hon'ble Tribunal, considering the fact that the Respondent MCZMA and SEIAA has categorically disallowed construction work on Aksa Beach and/or its inter-tidal areas.



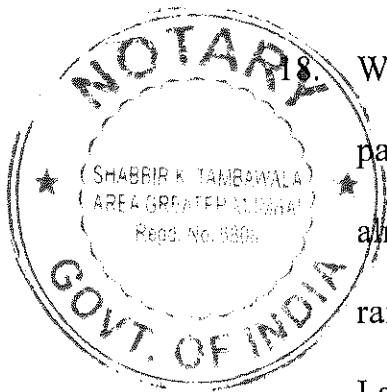
Further at page 553 of the Affidavit, it is recorded by IIT Bombay that sea water reaches the project site where lamp posts were previously present. I say that this indicates that the portion of the beach on which the present project is being constructed is most certainly a tidally influenced portion of the beach and is therefore CRZ I-A area, and not CRZ-II as wrongfully claimed by the Respondent no. 1. Therefore, the region is evidently an inter-tidal area wherein construction cannot be allowed as per the provisions of the CRZ clearance dated 05.03.2019.

16. With regards to the reports and documentation submitted by the Respondent No. 1 in its affidavit which recommends the construction of a seawall on the Aksa beach for the purpose of preventing erosion of the beach, I say that not one document produced by the Respondent prepared by either the CWPRS and IIT Bombay shows any recommendation for the construction of the road and commercial development of the beach. I further say that the said documents also do not show any consideration of the feasibility of "soft" erosion control techniques such as beach/sand nourishment which were directed for by the Hon'ble NGT in the matter of *C.H Balamohan v Union of India* (OA No. 04/2013 with Appeal No. 18/2017). I say that it is necessary to consider the feasibility of soft measures such as beach nourishment to ensure the permanent strengthening of the beach instead of only hard measures such as constructions of sea walls and groynes.



17. I say that at page 298 of the Affidavit, a paragraph within the EIA report itself notes that "*the best natural defense against erosion is an adequate beach, which causes waves*

to dissipate their energy, without eroding the coast.” I say that it is most important to note that across the board, it is universally accepted that the most effective technique to ensure long term protection of the beach and prevent erosion of beaches is to supplement and strengthen beaches, instead of constructing tidally obstructive “hard constructions” which block the natural tidal flow of water, increasing the flood prone nature of the area and result in a lack of sand and sediment passing on to the landward side of the hard construction, which ultimately leads to the complete erosion of the said sediment deprived landward portion beyond the hard construction.

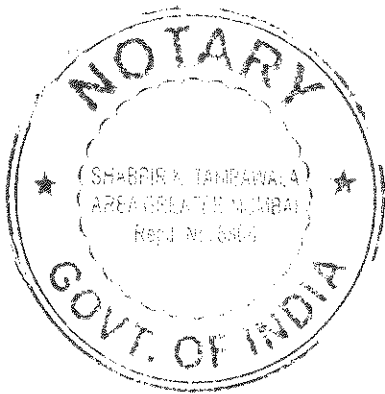


18. With regards to the averments of the Respondent No.1 at paras 24-29 of the Affidavit, that it has allegedly already almost completed the project, and therefore the grievances raised by the Applicants should allegedly not be considered, I say that the admissions of the Respondent that it has been constructing the project without the final amended CRZ clearance should be noted by this Hon'ble Tribunal. At any rate, I further say that the excuse that projects that are detrimental to the environment and are impermissible under

the CRZ Notification of 2011 can be permitted to be retained only on the grounds that they are near completion or are complete, neither can they be permitted to remain intact because the project proponent has spent considerable funds on the project. I say this averment is categorically covered by the judgment of the Hon'ble Kerala High Court in the matter of *Ratheesh K.R v State of Kerala 2013 SccOnLine Ker 14359*, where it was held as follows:

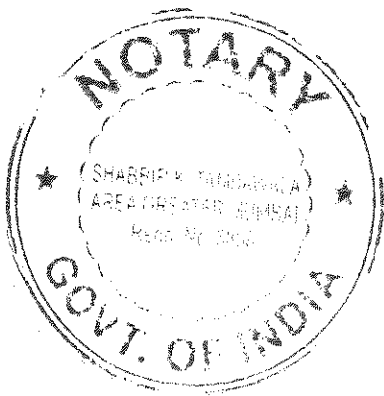
"We have found that the [sic: CRZ] Notification is applicable to the island, the island falls in CRZ-I and construction is impermissible. By merely getting a permit under the Building Rules, it cannot be in the region of any doubt that the company cannot arrogate to itself, the right to flout the terms of the Notification...."

107. At this stage, we must deal with the argument raised before us by the company. It is submitted that a world class resort has been put up which will promote tourism in a State like Kerala which does not have any industries as such and where tourism has immense potential and jobs will be created. It is submitted that the



Court may bear in mind that the company is eco-friendly and if at all the Court is inclined to find against the company, the Court may, in the facts of this case, give direction to the company and the company will strictly abide by any safe-guards essential for the preservation of environment.

108. We do not think that this Court should be detained by such an argument. The Notification issued under the Environment (Protection) Act is meant to protect the environment and bring about sustainable development. It is the law of the land. It is meant to be obeyed and enforced. As held by the Apex Court, construction in violation of the Coastal Regulation Zone Regulations are not to be viewed lightly and he who breaches its terms does so at his own peril. The fait accompli of constructions being made which are in the teeth of the Notification cannot present, but a highly vulnerable argument”.

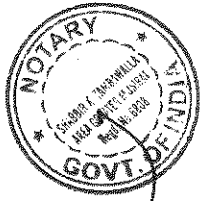


19. It is submitted that the said judgment was later upheld by the Hon'ble Supreme Court of India.



Solemnly Affirmed at Mumbai)
31st August)
Dated this Day of September 2023)

Bunni
Deponents



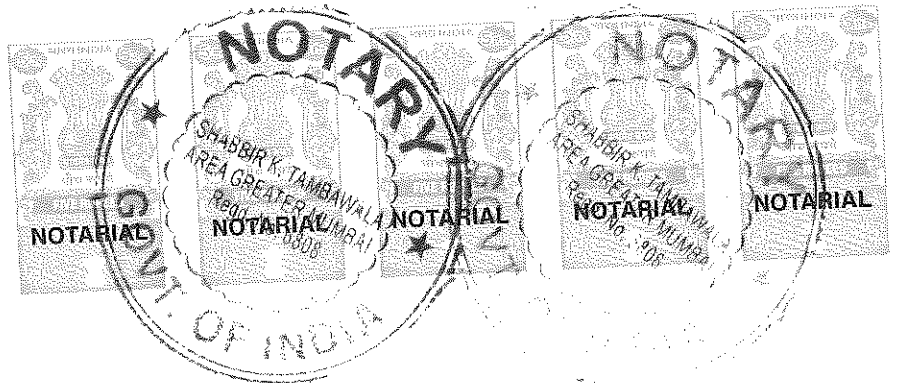
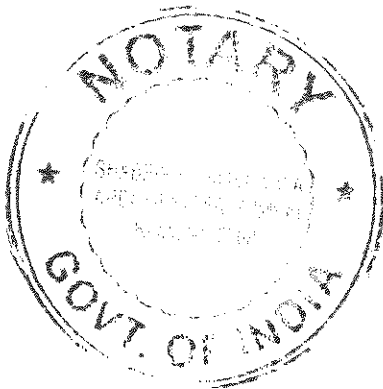
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FOR **RONITA BHATTACHARYA**
Advocate for the Applicants

BEFORE ME

S. K. Tambawalla
BEFORE ME
S. K. TAMBAWALLA
ADVOCATE, HIGH COURT
B-23, Taher Manzil
Nesbit Road, Mazgaon
Mumbai - 400 010
31/8/23

NOTARY & REGISTERED
150HR 31/8/23
Sr. No..... dt.....



581
ANNEXURE - A-1

574

MAHARASHTRA COASTAL ZONE MANAGEMENT AUTHORITY

Tel. No. : 022 22855082
Email:- dir1.mev-mh@nic.in
Website: <https://mczma.gov.in/>

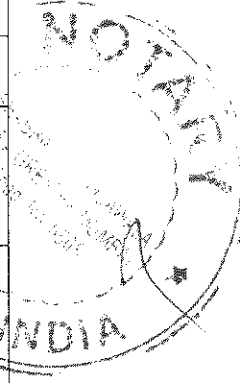
No. MCZMA 2023/CR 21/TC4
Office of the –
Maharashtra Coastal Zone Management
Authority, Environment & Climate Change
Department, 15th Floor, New Administrative
Building, Mantralaya, Mumbai- 400 032
Date: 07th August, 2023

To,
All the Project Proponents

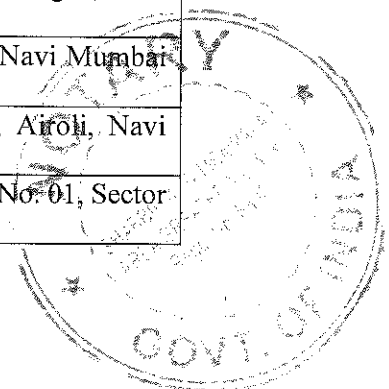
Subject: 168th Meeting of Maharashtra Coastal Zone Management Authority (MCZMA) scheduled on 10th August, 2023

I am directed to inform you that, the 168th Meeting of Maharashtra Coastal Zone Management Authority (MCZMA) under the Chairmanship of Principal Secretary (Environment) is scheduled on **10th August, 2023 at 03.00 pm** onwards through Video Conference. Revised agenda for the meeting are as follows:

Sr. No.	Subject
Part A	
1.	Proposed Staf Quarter at C. S. No. 631 of Vaikunthdham Hindu Cemetery at Reay Road in E Ward, Mumbai by MCGM
2.	Proposed restoration of Worli Fort & landscaping & illumination of surrounding periphery of fort ay Worli Koliwada n G/ South Ward, Mumbai by MCGM
3.	Proposed storm water pumping station, mitre gates/ tidal gates and coarse screen, retaining wall, admin building & allied civil works within the water course of Mogra Nalla situated on the downstream side of 36.60m wide DP road, at village Oshiwara, Andheri (W), K/W ward, Mumbai by MCGM
4.	Proposed reconstruction of building no. 6 for staff quarters & hostel for NHDC on plot no. 23 under possession of NHDC bearing C. S. no., 47 (pt) at Lala Lajpatrai College Road Junction, K. K. Marg at Haji Ali in G/S ward, Mumbai by MCGM
5.	Proposed widening & reconstruction of existing bridge across Mithi River at Mahim Causeway in G/N ward, Mumbai by MCGM
6.	Proposed redevelopment of Worli Koliwada Primary Municipal School at plot bearing CTS no. 2/224 pf Worli Division in G/S ward, Mumbai by MCGM
7.	Proposed reconstruction of Gymnasium Building on Chattrapati Shivaji Maharaj Kridangan on plot bearing CTS No. 1472/C, 1473/C, 1474/C, 1476/C, 1477/A & 1478/A of village Dahisar, NL Complex, Dahisar €, R/N ward, Mumbai by MCGM
8.	Proposed reconstruction of storage water reservoir no. 3 & Municipal office over the top of the proposed reservoir with elevated inspection gallery and construction of elevated internal access within 'Joseph Baptista Garden' in E ward, Mumbai by MCGM
9.	Proposed beautification of Madh Fort on plot bearing CTS no. 1274 (pt) & existing open land on plot bearing CTS no. 1275 (pt) of Madh village, situated in K/W ward, Mumbai by MCGM
10.	Proposal for work of beautification, illumination of seaside plaza at Marine Drive - Water front, Nariman Point, Churchgate, Mumbai by MCGM
11.	Proposed construction of bridge across Oshiwara River and Malad creek in K/W, P/s and P/N ward by MCGM



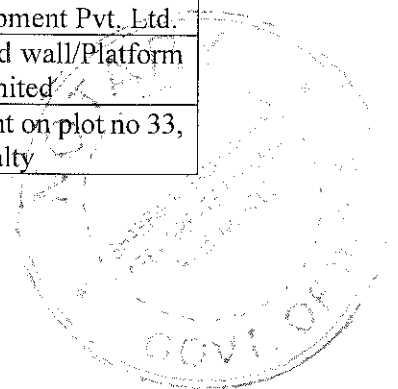
12.	Proposed construction of bridge across boundary Nalla near MHADA bus depot at Mulund € connecting to the proposed 18.30 m wide DP road up to Hari Om Nagar near boundary of Thane Jurisdiction by MCGM
13.	Proposed construction of Earthen Bund along Water front at Kanjur Municipal Solid Waste (MSW) processing facility Eastern Express Highway, Kanjur Marg €, Mumbai by MCGM
14.	Proposed exclusion of NDZ on plot bearing C. S. no. 1A/11 (pt) and 1A/12 (pt), Wadala, M/W ward, Mumbai for Storm Pumping Station, Mitre Gates / Tidal Gates and other allied facilities at Mahul Nalla by MCGM
15.	Proposed development of the Balkum – Gaimukh Road, Thane by TMC
16.	Proposal for amendment in CRZ Clearance for Anti Sea Erosion Measures to sea front development & beatification at Aksa beach, Madh, Mumbai Suburban by MMB
17.	Proposed widening of existing approach road and strengthening of existing jetty at Jaigad, Dist. Ratnagiri by MMB
18.	Proposed construction of protection wall and beautification at Erangal beach, Mumbai by MMB
19.	Proposed construction of anti sea erosion bund and development of tourist amenities at Silver beach, Madh, Mumbai by MMB
20.	Proposal for dredging of rock in the navigational channel at Diwale village, Belapur, Navi Mumbai by MMB
21.	Proposed construction of sloping ramp and approach road at Koperkhairane Sector 19, Navi Mumbai by MMB
22.	Proposed construction of sloping ramp at Juhu Gaon Talav, Navi Mumbai by MMB
23.	Proposed construction of sloping ramp at Airoli near Sector 20, Navi Mumbai, Dist. Thane by MMB
24.	Proposed construction of jetty, platform and approach road at Khar Approach road at Khar Ambivali, Tal. Kalyan, Dist. Thane by MMB
25.	Proposed construction of Fish Drying platform at Madh Patwadi, Koliwada & Madh Vatargalli, Mumbai Suburban, Mumbai by Harbour Engineering Division, Navi Mumbai
26.	Proposed construction of boat repairing yard and extension of the existing jetty at Gorai Koliwada, Mumbai by Harbour Engineering Division, Navi Mumbai
27.	Proposed construction of fish drying platform at Kadeshwari Devi Mandir, Bandra, Mumbai and construction of ramp at Patilpada, Khardanda Koliwada, Mumbai by Harbour Engineering Division, Navi Mumbai
28.	Proposed construction of fish drying platform and boat basin at village Talpasha, Madh, Mumbai by Harbour Engineering Division, Navi Mumbai
29.	Proposed construction of fish drying platform at Madh Madhlapada in Mumbai Suburban by Harbour Engineering Division, PWD
30.	Proposed construction of anti sea erosion bund at Murud, Dist. Raigad by Harbour Engineer, PWD
31.	Proposal for Kharland Scheme at Elaye Joshiwada (patthar), Tal. Devgad, Dist. Sindhudurg by PWD, Sindhudurg
32.	Proposed Coastal Road from Amra Marg to JNPT at Ulwe Node, Navi Mumbai by CIDCO
33.	Proposed construction of school at Plot No. 15A, Sector 10 A, Airoli, Navi Mumbai by NMMC
34.	Revalidation of CRZ clearance for proposed Sport Complex at Plot No. 01, Sector 13, Ghansoli, Navi Mumbai by NMMC



35.	Proposed construction of building on land bearing plot no. 34, sector 11, Node CBD Belapur, Navi Mumbai by M/s Patel & Associates (MPSC)
36.	Proposed construction of Major Bridge across Kelshi Creek on Revas-Reddi Coastal Highway MSH 4, Tal. Dapoli, Dist. Ratnagiri by MSRDC
37.	Proposal for strengthening and extension of jetty at Bandra, Tal. Andheri, Dist. Mumbai for Versova Bandra Sea link by MSRDC
38.	Extension to accorded CRZ clearance for Kalyan Ring Road project in Thane District by MMRDA
39.	Proposal for construction of spur line and approach road to proposed Kasheli depot of Mumbai Metro Line - 5 (Thane - Bhiwandi - Kalyan) by MMRDA
40.	Amendment in CRZ area of Worli Metro Station and allied activities by MMRCL
41.	Extension of validity of CRZ clearance for proposed redevelopment of Transit Camp with Transit, EWS & MIG types Tenements on land bearing at S. no. 113 (pt), CTS no. 356 A (MHADA land) Kannamwar Nagar, Vikhroli €, Mumbai by MHADA
42.	Proposed creation, development and beautification of open land on plot bearing CTS no. 1213 (pt), ROS 1.5 Juhu Koliwada, Santacruz (W), K/W ward, Mumbai by MHADA
43.	Proposed construction of bungalow for Disaster Management Authority raigad and resident deputy collector raigad in Alibag Municipal Council area by Alibag Municipal Council
44.	Proposed construction of Valmiki Samaj Hall at Siddharth Nagar at Alibag, Dist. Raigad by Alibag Municipal Council
45.	Proposal for repair work of Smashan Bhoomi at Govind Nagar in Alibag Municipal Council, Alibag, Dist. Raigad by Alibag Municipal Council
46.	Proposed construction of Police Quarters and RPI Headquarter building at CTS No. 1180, 1181 and S. No. 119 at Alibag, Tal. Alibag, Dist Raigad by Raigad Police
47.	Proposal for reconstruction of Minor Bridge on Vihoor Mohalla to Pair Mohalla Road on VR - 29 in Km 1/500, Tal. Murud, Dist. Raigad by PWD, Alibag
48.	Proposed restoration & repairing of existing road in Survey no. 38 (1) & 39 (1) at Murud Janjira, Tal. Murud, Dist. Raigad by Murud Janjira Municipal Council
49.	Proposed Pipeline (20inch diameter) from JNPT to Uran Terminal, Dist. Raigad by BPCL
50.	Proposed Maharashtra Coastal Police Training Academy on plot bearing S. no. 75 of village Killa, Tal. & Dist. Ratnagiri by Superintendent of Police, Ratnagiri
51.	Proposed reconstruction of Boat Club on plot bearing S. no. 256/A, 256/B, CTS no. 886, 885 at village Khed, Tal. Khed, Dist. Ratnagiri by Khed Municipal Council
52.	Proposal for beautification in the campus of Swayambhu shri Dev Velneshwar Temple, Tal. Guhagar, Dist. Ratnagiri by PWD, Chiplun
53.	Proposal for setting up temporary seasonal structures for beach shacks, deck-beds, Umbrellas, huts & other structures at Are Ware Beach, Dist. Ratnagiri by Director of Tourism
54.	Proposed reconstruction of Vegetable Market & commercial building on plot bearing CS no. 1242 at Malvan, Tal. Malvan, Dist. Sindhudurg by Malvan Municipal Council
55.	Proposed Sewage Treatment Plant at Idgha road Bhiwandi, Dist. thane by BNMC
56.	Proposed drilling of Ten (10) Exploratory Wells in offshore block MB-QSHP-2018/1 in Gujrat and drilling of four (4) Exploratory Wells in offshore block MB-QSHP-2018/2 in Western Offshore Basin, Mumbai by ONGC

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57.	Proposed drilling of four exploratory wells in offshore block MB-OSHP-2018/2 in Western Offshore Basin Mumbai by ONGC
58.	Proposal for repairs of damaged sea wall at INS Shikra by INS Shikra
59.	Proposed laying of new water pipeline from Cuffe Parade to TIFR, Mumbai by Tata Institute of Fundamental Research
60.	Proposed Eco-tourism activity along with renovation of existing Embankment on agricultural land along survey no. 268, 269 of village Gorai, Mumbai Suburban and S.no. 172 of Village Uttan, Dist. Thane by Water Resources Department
61.	Proposed restoration & conservation work of Janjira Dharavi Fort and development of Narvir Chimaji Appa Statue & surrounding area at Chowk in Mira bhayandar, Dist Thane by MBMC
62.	Proposed work of de silting and cleaning of 8 number of nallas at various locations in Mira Bhaindar Municipal Corporation
63.	Proposed upgradation of Reves-Reddi Coastal Highway MSH-04 to two lane with paved shoulder Package IB, from Murud Taluka in Raigad to Bankot village in Dist. Ratnagiri by MSRDC
64.	Amendment in CRZ clearance for proposed construction of Creek Bridge across Dharamtar Creek joining Karanja to Revas in Dist. Raigad by MSRDC
Part B	
65.	Proposed residential building on plot bearing S. No. 218 H No. 2, 5, 7, 8, 9, 10, 11, 12, 13, 15, 16, 17 and S. No. 6B, 7, 8 at Village Uttan, Bhayader Tal. & Dist. Thane by M/s. G J Infra
66.	Proposed redevelopment of the building on plot bearing CTS no. 1110/8 of village Bandra D at Union Park Road, Khar (W), H/W ward, Mumbai by Shri. Rupinder Singh Arora
67.	Proposed construction of residential building on plot bearing S. no. 129, H. no. 3 at village Malgund, Tal. & Dist. Ratnagiri by Shri. Surendra Daulat Salvi & others (Shri. Pravin Chandrakant Javalkar)
68.	Proposed vertical expansion of existing building on land bearing plot no 60, CTS No. 326 of village vile parle, JVPD Scheme, Vile Parle (W), Mumbai by Shri. Jayant Himmatlal Joshi
69.	Proposal for development on land bearing plot no. 105A, Sector 50 E, Nerul, Navi Mumbai by M/s Disha Architects (Yogesh Sarjine)
70.	Proposed redevelopment of building on plot no. 27 of Jai Hind Society having CTS no. 599, Vile Parle (W) at N. S. Road no. 12, Village Vile Parle (W), Jai Hind Society, Mumbai by Shri. Jatin D. Saraiya & Others
71.	Proposed construction of building on pot bearing CTS No. 1069 & 1070 of village pahadi Goregaon at Bangur nagar, Goregaon (W), Mumbai by Shri. Manish Karnik
72.	Proposed reconstruction / redevelopment of the existing building known as "Madhusudhan House" situated on plot bearing CS no. 2L/738 of Malbar Cumballa Hill Division at ML Dahanukar Marg, Mumbai by M/s Godrej Properties Ltd.
73.	Proposed development of beach resort on plot bearing S. no. 4/1/7 at Mandve Tarfe Zirad, Tal. Alibag, Dist. Alibag by Shri. Arundhati Dilip Bhonsle & Smt. Neha Dilip Bhosle
74.	Proposed development of a captive passenger jetty terminal on west coast near village Theronda, Tal. Alibag, Dist. Raigad by M/s Pavor Development Pvt. Ltd.
75.	Proposed repairs / reconstruction of Sea Retaining wall/compound wall/Platform at TCI Industries Ltd, Colaba, Mumbai by M/s TCI Industries Limited
76.	Proposed development of residential cum commercial development on plot no 33, 34 & 35, Sector 9 at Ghansoli, Navi Mumbai by M/s Alliance Realty



77.	Proposed redevelopment of residential building on plot bearing C. S. no. 590 of Malabar & Cumballa Hill Division, Nepean Sea Road, Mumbai by M/s Kupati Builders Pvt. Ltd & Kapi Builders Pvt. Ltd.
78.	Proposed addition / alterations and internal changes in the existing building know as Marine Mansion on plot bearing CTS no. B/757 of village Bandra at B. J. Road, Bandra (W) in H/W ward, Mumbai by Shri. Subhash S. Runwal
79.	Proposed Slum Rehabilitation Scheme on plot bearing C. S. no. 876(pt), 877 to 880 and C. S. no. 894 (pt) to 897 (pt) of Worli Division, situated at Khar Abdul Gafar Khan Marg, G/S ward, Worli, Mumbai by M/s Sattadhar Constructions Pvt. Ltd.
80.	Proposed SRA scheme on 'Worli Adarsh Nagar Sagar Darshan CHSL' on plot bearing C S no. 5 (pt), & 15 (pt) Division Worli, Adarsh Nagar, Worli, G/S ward, Mumbai by M/s Chintaharni Chintpurni Realtors LLP
81.	Proposed construction on residential building on land bearing plot no. 2, Sector 15, Taloja, Navi Mumbai by M/s Planet Builders & Developers
82.	Proposed redevelopment of the building on plot bearing CTS no. D/900C/8, plot no. 707 of village Bandra-D at existing 12.20m wide 21st road, Bandra (W), in H/W ward, Mumbai by Shri. Dilip D. Jogeshwar (M/s New Laxmi CHSL)
83.	CRZ status for the survey no. 109/1, village Versave, Near Fountain Hotel, Eastern Express Highway, Mira Bhayandar Municipal Corporation, Thane by M/s IPCA Laboratories Ltd.
84.	Proposed construction of holiday homes on plot bearing Gut No. 356/2 & 357 at mauje kolgaon, Tal. Alibag, Dist. Raigad by Shri. Suni Haripanth Pophale
85.	CRZ Status for land bearing proposed SRA scheme on plot bearing CS no. 5 (pt), 16 (pt), 209 (pt), 827 (pt) and plot behind CS no. 15, 826 & 991 of Worli Division, Janta Colony, Worli, Mumbai by M/s Chintaharni Chintapurni Realtors LLP
86.	Proposed redevelopment of residential building on property bearing CTS no. 1110, 1110/1 to 13 of village Versova at 18.30 wide D P Road, Andheri W, K/W ward, Mumbai by Shri. Aiyub I Patel (M/s Olive Developers)
87.	Proposed development of residential project on plot bearing Gut no. 115 at mauje Dhokawade, Tal. Alibag, Dist. Raigad by M/s Sobo Estate Developers Pvt. Ltd.
88.	Proposed residential building on plot bearing on S. No. 284 (pt), S. No. 389 of village Juchandra, Tal. Vasai Dist Palghar by Shri. Nivrutti H Mhatre
89.	Proposed resort on plot bearing S. no. 93/18 A, 93/19, 93/21 of village Vayangni, Tal. Vengurla, Dist. Sindhudurg by Shri. Chetan Jasvant Mehta

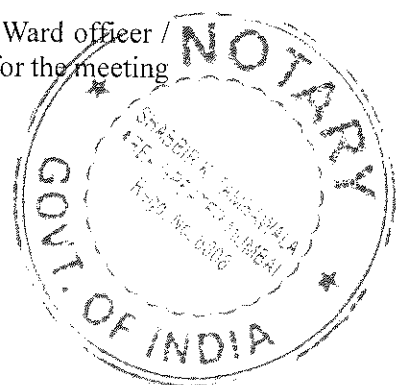
Sd/-
(Abhay Pimparkar)
Director, Environment
& Member Secretary, MCZMA

Copy Submitted to: PA to Chairman, MCZMA

Copy to: All members of MCZMA to attend the online meeting

Imp. Note: For all Govt. Projects it is to ensure that Senior Officials such as Ward officer / Chief Engineer / Dy. Chief Engineer / Executive Engineer shall remain present for the meeting for the presentation.

*True Copy
&
Advocate*



BEFORE THE NATIONAL GREENTRIBUNAL
MEMORANDUM OF APPLICATION

(Under Section 18(1) read with

Sections 14, 15 and 20 of the National Green

Tribunal Act, 2010

Application No. 77 of 2023

Banda Nagaraj Kumar and Anr... Applicants

versus

Maharashtra Maritime Board and

Ors

...Respondents

AFFIDAVIT IN REJOINDER

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