

**BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI**

**INDEX**

IN

**SUPPLEMENTARY AFFIDAVIT**

IN

**INTERVENTION APPLICATION NO. 288 OF 2024**

IN

**OA NO. 526 OF 2023**

**GANGA SEVA ABHIYANAM AND OTHERS.....PETITIONERS**

**VERSUS**

**UNION OF INDIA.....RESPONDENT**

**IN THE MATTER OF**

**SHRIKANTA MAHESHWARI W/O LATE RAVINDRA KUMAR MAHESHWARI  
R/O 315A/412 JAMUNA BANK ROAD CHAUKHANDI KYDGANJ,  
PRAYAGRAJ 211003**

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Dated: 15/9/2025

Place:

Filed by:

  
(SHRISH CHANDRA)

Advocate,

Enrolment no.: UP3429/2018

Mobile No. +91 6393935163

**BEFORE THE NATIONAL GREEN TRIBUNAL**

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PRAYAGRAJ 211003**

1. That vide letter No. PDA/BP/21-22/0327 dated 13/03/2024 Prayagraj Development Authority had not allowed the purchasable FAR on our proposed Group Housing Scheme due to the Hon. High Courts Order passed in PIL No. 4003/2006 regarding the constructions stopped in HFL+500 area (finally which was disposed) and due to which filed an Intervention Application No. 288 of 2024 in OA No. 526 of 2023.
2. That in the report prepared by Ministry of Jal Shakti Through Central Water Commission in NGT matter Numbered as OA 316 of 2022 the flood plain zone of river Yamuna was carved out from Asgarpur to Prayagraj.

3. That another relevant averment was that the layers were analysed and the total areas affected on a district wise note conveying maximum width of flood inundation from left and right bank was tabulated based on 100 years period return at 200 meters interval which was annexed at Annexure no. 5 of the said report with initial picturization conveyed at page no. 603 with tabulation at page 604. **A copy of the said picturization and tabulation in marked and annexed herewith as Annexure No. SA-1.**
4. That as far as district of Prayagraj is concerned where the property in question happens to be situated, the report starts from page no. 1083 and with specific area present at page 1088 with coordinated arrayed as serial no. 11196 uptill 11204. **A copy of the said coordinates is marked and annexed herewith as Annexure No. SA-2**
5. That when a comparative study from the satellite imagery was drawn the area in question was marked and cited wherein the red lines marks the geo coordinates of the flood plain starting from **25.4298.81.8568 uptill 25.4251.81.8426**. The yellow area is marked as the site in question approval for which is requested.
6. That it can clearly be inferred from the said imagery that the area in question is much beyond the demarcation of the 100-year zone thereby making it axiomatic that the said area has no relevance or connection to be affecting the streamline of the river which is the intended cause of action resulting in inhibitions. **A copy of**

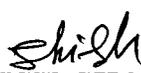
**said imagery is marked and annexed herewith as Annexure No. SA-3.**

7. That the said area does not form part of the affected area and therefore any restriction beyond this area would be in violation of the possessory rights and would also result in loss to the ex-chequer.
8. That in the new proposed and approved Master Plan 2031(Revised) the Prayagraj Development Authority has also marked the HFL, HFL+200 and HFL+500 lines only upon the river Ganga and our site which is on the Bank Road along the Yamuna River there is no such marking. **A copy of said Master Plan is annexed herewith as Annexure No. SA-4**
9. That in light of the said presented facts the requested approval may stand granted else the same would be averse to the interest of justice, equity and good conscience.
10. That the said supplementary shall stand treated as the part of the intervention application and shall stand taken on record.

Dated: 15/9/2025

Place:

Filed by:

  
(SHRISH CHANDRA)

Advocate,

Enrolment no.: UP3429/2018

Mobile No. +91 6393935163



**Table 8: District wise area under inundation corresponding to flood of 100-year return period along with maximum width of inundation both on Left and Right Bank of river Yamuna**

Name of District	Area under inundation corresponding to flood of 100-year Return Period (Km <sup>2</sup> )	Geographical area of district		Maximum Width of inundation (Km)	
		In Km <sup>2</sup>	In %	Left Bank	Right Bank
Faridabad	139.6	745.1	18.7%	4.33	5.99
Mathura	287.7	3348.0	8.6%	4.65	3.71
Palwal	111.7	1363.0	8.2%	8.80	2.72
Gautam Buddh Nagar	91.8	1416.8	6.5%	4.34	2.29
South East Delhi	5.2	101.7	5.1%	0.35	1.56
Kaushambi	87.6	1788.5	4.9%	5.73	-
Etawah	97.1	2326.3	4.2%	2.19	5.31
Agra	167.6	4053.1	4.1%	2.55	5.09
Fatehpur	160.6	4166.0	3.9%	5.86	1.27
Banda	161.8	4449.4	3.6%	-	7.02
Chitrakoot	98.1	3189.9	3.1%	-	6.28
Hamirpur	118.4	3893.7	3.0%	-	8.92
Kanpur Dehat	89.3	3155.9	2.8%	3.94	-
Jalaun	120.2	4563.2	2.6%	-	4.97
Auraiya	51.7	2017.9	2.6%	2.69	-
Firozabad	56.8	2421.5	2.3%	1.90	-
Kanpur	60.8	2997.1	2.0%	1.67	-
Prayagraj	77.6	5470.5	1.4%	3.22	2.73
Aligarh	28.2	3716.9	0.8%	2.77	1.95
Hathras	2.5	1784.3	0.1%	-	
<b>Total</b>	<b>2014(Km<sup>2</sup>)</b>	<b>56969 (Km<sup>2</sup>)</b>			

Furthermore, individual maps for each district were prepared for clear representation of flood inundation (Figure 12).

15 SEP 2025

BERNARD SHUKLA  
Advocate  
13301/2022  
COMMISSIONER  
646.852  
15-9-04

Shri Desai Maheshwar

Aman N-2

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Prayagraj

1088

10706	25.327	81.67	11161	25.4216	81.8044
10707	25.3259	81.6692	11162	25.4235	81.8044
10708	25.3261	81.6673	11163	25.425	81.8041
10709	25.3262	81.6655	11164	25.4239	81.8058
10710	25.3254	81.6643	11165	25.4224	81.8071
10711	25.3242	81.6645	11166	25.4209	81.8082
10712	25.3241	81.6665	11167	25.42	81.8097
10713	25.3247	81.6681	11168	25.4198	81.8117
10714	25.3241	81.6699	11169	25.4194	81.8135
10715	25.3227	81.6705	11170	25.4186	81.8153
10716	25.3217	81.6716	11171	25.4176	81.8165
10717	25.3219	81.6733	11172	25.4158	81.8156
10718	25.3211	81.6751	11173	25.4143	81.8144
10719	25.3197	81.6762	11174	25.4143	81.8127
10720	25.3181	81.676	11175	25.4124	81.8128
10721	25.3177	81.6776	11176	25.4121	81.8142
10722	25.3174	81.6795	11177	25.4134	81.8157
10723	25.3176	81.6814	11178	25.4146	81.817
10724	25.3174	81.6831	11179	25.4157	81.8186
10725	25.3182	81.6845	11180	25.4168	81.8201
10726	25.3192	81.686	11181	25.4179	81.8216
10727	25.3199	81.6877	11182	25.4197	81.8218
10728	25.3202	81.6897	11183	25.4209	81.8216
10729	25.3207	81.6916	11184	25.4202	81.8232
10730	25.3213	81.6935	11185	25.42	81.8252
10731	25.322	81.6953	11186	25.4196	81.8267
10732	25.3227	81.697	11187	25.4199	81.8286
10733	25.321	81.6971	11188	25.4203	81.8305
10734	25.3208	81.6984	11189	25.4206	81.8325
10735	25.3218	81.7001	11190	25.4211	81.8343
10736	25.3228	81.7017	11191	25.4217	81.8362
10737	25.3244	81.702	11192	25.4234	81.8367
10738	25.3256	81.7035	11193	25.4247	81.8378
10739	25.3262	81.7053	11194	25.4234	81.8391
10740	25.3268	81.7072	11195	25.4242	81.8409
10741	25.3279	81.7086	11196	25.4251	81.8426
10742	25.3278	81.7105	11197	25.4258	81.8444
10743	25.328	81.7124	11198	25.4267	81.8461
10744	25.3287	81.7139	11199	25.4273	81.8478
10745	25.3299	81.7153	11200	25.4277	81.8494
10746	25.3298	81.7172	11201	25.4281	81.8513
10747	25.3286	81.7186	11202	25.4286	81.8532
10748	25.3269	81.7193	11203	25.4293	81.855
10749	25.3261	81.7181	11204	25.4298	81.8568

15 SEP 2025

Prayagraj

HEMANT  
 Reg.No. UP 1500  
 OATH COM  
 High Com  
 Sl.No. 640862  
 15-9-20

Shri Kanta Mohan Singh





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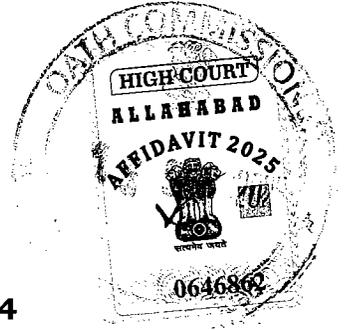
SHRIKANTA MAHESHWARI W/O LATE RAVINDRA KUMAR  
MAHESHWARI R/O 315A/412 JAMUNA BANK RAOAD CHAUKHANDI  
KYDGANJ, PRAYAGRAJ 211003

AFFIDAVIT OF

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MAHESHWARI R/O 315A/412 JAMUNA BANK RAOAD CHAUKHANDI  
KYDGANJ, PRAYAGRAJ 211003

1. That I am the applicant in the above mentioned application and as such I am conversant with the facts and circumstances of the present case.

2. That the contents in the accompanying application from Paras <sup>1579</sup> at pages <sup>3,4,6,8,</sup> are true and correct to the best of my knowledge and belief, based on information derived from the record of the case and legal



Shri Kanta Maheshwari

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submissions made therein are as per the advice of the TA counsel and are believed to be true and correct.

3. That the averments of the facts stated herein above are true to the best of my knowledge and belief and no part of is false and nothing material has been concealed thereof.

4. That the contents of above paragraphs of the present affidavit and the contents accompanying supplementary have been well understood by me.

 R.T.P.

*Shri Kanta Maheshwari*  
DEPONENT

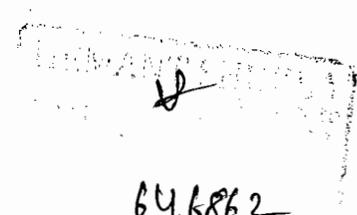
**VERIFICATION**

Verified at \_\_\_\_\_ on this \_\_\_\_\_ that the contents of my above affidavit are true and correct and no part has been concealed thereof.

*Shri Kanta Maheshwari*  
DEPONENT

DATE:

PLACE:

 *15*  
 *15*  
646862  
15-9-2011

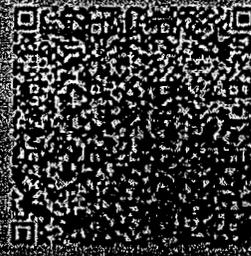
*Shri Kanta Maheshwari*



भारत सरकार  
Government of India



श्रीकांता महेश्वरी  
Srikanta Maheshwari  
जन्म तिथि / DOB: 14/09/1960  
महिला / Female



आधार - आम आदमी का अधिकार



भारतीय विशिष्ट पहचान प्राधिकरण  
Unique Identification Authority of India

पता: W/O: रविन्द्र कुमार माहेश्वरी, Address: W/O: Ravindra Kumar  
मकान संख्या 315ए/412, जमुना बैंक Maheshwari House Number 315A/412,  
रोड, चौखंडी कीडगंज, इलाहाबाद, jamuna Bank Road, Chaukhandi Kydganj,  
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प्रदेश, 211003 Allahabad, Uttar Pradesh, 211003



HEMANT SHUKLA  
Advocate  
Reg. No. U.P. 1520/14/22  
OATH COORDINATOR  
High Court  
646862

15-9-05

Shri Kanta Maheshwari