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BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 165 OF 2025

(Under Section 18(1) read with Sections 14, 15 & 17 of
National Green Tribunal Act 2010)

Kishan Lal & Anr.

...Applicants

VERSUS

The State of Uttar Pradesh & Others

...Respondents

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APPLICANT

Through

Place:
Date:


AMARNATH & BRAJESH KUMAR JHA
Counsels for Applicant
Bungalow No. 8-B, LGF,
Jangpura - B, Main Mathura Road
NEW DELHI - 110014

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**ADDITIONAL AFFIDAVIT / SUBMISSION ON BEHALF OF
THE APPLICANTS TO THE INCOMPLETE AND DEFICIENT
REPORT OF THE JOINT COMMITTEE DATED 22.07.2025**

I, Kishan Lal S/o. Shri Mahipal Singh R/o. House no. 599,
Shahpur, Bamheta, Ghaziabad - 201001, Uttar Pradesh,
presently at Delhi Applicant, do hereby most respectfully
submit the following:



That the report submitted by the Joint Committee (JC) is
incomplete, hypothetical, and not based on factual and
comprehensive inspection of township being development

by the Respondent No. 2. It appears that the said report is a casual report prepared merely on the basis of verbal explanations given by the Project Proponent (PP) during the site visit. It is further submitted that the said report is without proper verification or examination of relevant records, ground realities and physical inspection of entire township.

2. That as stated in para 21 of the Applicant's main application, it has been specifically alleged that the township is situated in two separate parts i.e. H and G Blocks which are located on the west side of the village *abadi*, while the major part of the township comprising Blocks A, B, C, D, E, and F is situated on the south side of the village *abadi*, which is on the north side of the GT Road, covering approximately 250 acres of the entire township area. The group housing project on Plot No. GH-3 comprising individual floors, commercial complexes, and social/community facilities center are all being constructed by the PP in this south-side area.



3. That the Joint Committee in its report has failed to inspect and report on the major part of the township i.e. 250-acre area which comprising Blocks A, B, C, D, E, and F, where extensive developments and constructions activities are ongoing.
4. That the Joint Committee and the Nodal Officer, of District Ground Water Management Council (DGWMC), have inspected only the H and G Blocks of the township, where the group housing projects on Plot Nos. GH-1 and GH-2 are being developed by the PP.
5. That the Joint Committee in its report has not examined all the violations committed by the PP with regard to the approved population density, i.e. 150 dwelling units or 750 persons per hectare with a basic FAR of 1.5 as approved in the DPR, as specifically raised in paras 15 and 19 of the Petition.



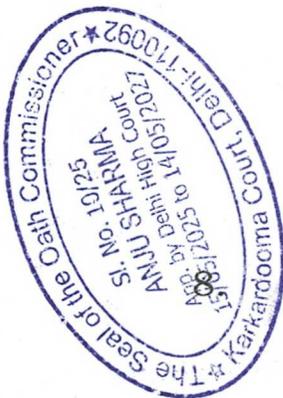
6. That the Joint Committee has further failed to inspect and report on the issues raised in paras 25 to 31 of the Petition. In DPR/layout plan the green area shown as MG1 and MG4 was never purchased by the PP, therefore development of Master Green area does not arise. Likewise the MG2, MG3, MG5, and MG6 which have allocated for Master Plan Green Area have been encroached by PP. Further 37.72 acre of Green Area shown in the DPR/layout plan out of which 7 acres part of G6, GR16, GR8, GR11, GR1a, GR11a, G16, GR3a, GR15, GR18 and GR 27 was never purchased by PP and till date it is in village abadi and possession of villagers.
7. That the Joint Committee in its report has relied upon the inspection report of the Nodal Officer, DGWMC dated 23.06.2025, regarding extraction of groundwater by the PP only for domestic purposes pertaining only to a limited portion of the township (south side of the village *abadi*, i.e., G and H Blocks) but not for entire area of township. Further in its report of Joint Committee does not disclose



the quantity of ground water used for entire built up area of construction of the township i.e. built area of Group Housing on plot no. GH-1, GH-2, GH-3, commercial complexes on plot nos. 1, 5 and 8, around 500 units of floor built area on different part of the township, EWS LIG built area, social and community facility built-up area etc. The report of the Nodal Officer, DGWMC is incomplete for following reasons:

- (i) No details have been furnished regarding the installation and operation of piezometers inspected at the site of group housing on plot no. GH-1 and GH-2.
- (ii) No information has been provided regarding maintenance of a logbook for recording daily groundwater abstraction on the inspected group housing situated at plot nos. GH-1 and GH-2.

That the Joint Committee and the Nodal Officer of DGWMC have not inspected the southern portion of the



township being developed by the PP, and consequently, no report has been submitted with respect to the said area.

9. That the Joint Committee in its report is silent on the issues raised in paras 40, 41, and 49 of the application regarding *illegal felling of green trees* in violation of the U.P. Protection of Trees Act, 1976.
10. That the Joint Committee Report on behalf of District Magistrate, Ghaziabad in para 13 of affidavit stated that the PP has sold the various FSI to construct the group housing society within the project. However, no such documents as alleged sale is enclosed. Moreover, permissions and clearances granted to the PP are not transferable and cannot be sold.



That the Joint Committee in its report has also failed to inspect and report the status of the *Common Sewage Treatment Plant (STP)* of the township. It is submitted that untreated sewage is still being discharged into open

areas within the township premises, as evidenced from photographs dated 31.10.2025 annexed herewith as **Annexure - A.**

In view of the above, it is most respectfully submitted that the report of the Joint Committee is incomplete, inaccurate, and fails to address the core environmental and statutory violations raised in the Application. The said inspection has been confined to a limited portion of the project and does not represent the actual ground situation of the entire township.

PRAYER

In light of the foregoing submissions, it is most respectfully prayed that this Hon'ble Tribunal may kindly be pleased to:

a) Direct the Joint Committee to conduct a thorough inspection of the entire township area including Blocks A to F, commercial plots, and associated infrastructure;

Direct the Joint Committee to verify the issues relating to groundwater extraction, STP functioning, tree cutting,



population density, master plan violations, encroachment of green area master green of the entire township and discharge of untreated sewage; and

- c) Pass such other or further orders as this Hon'ble Tribunal may deem fit and proper in the interest of justice and environmental protection.

Kishan Lal
DEPONENT

VERIFICATIONS:

04 NOV 2025

Identify the Deponent who has signed
thumb impression in my presence

Verified at Delhi on thisday of November, 2025 that the contents of my above affidavit are true and correct and no part of it is false and nothing material has been concealed therefrom.



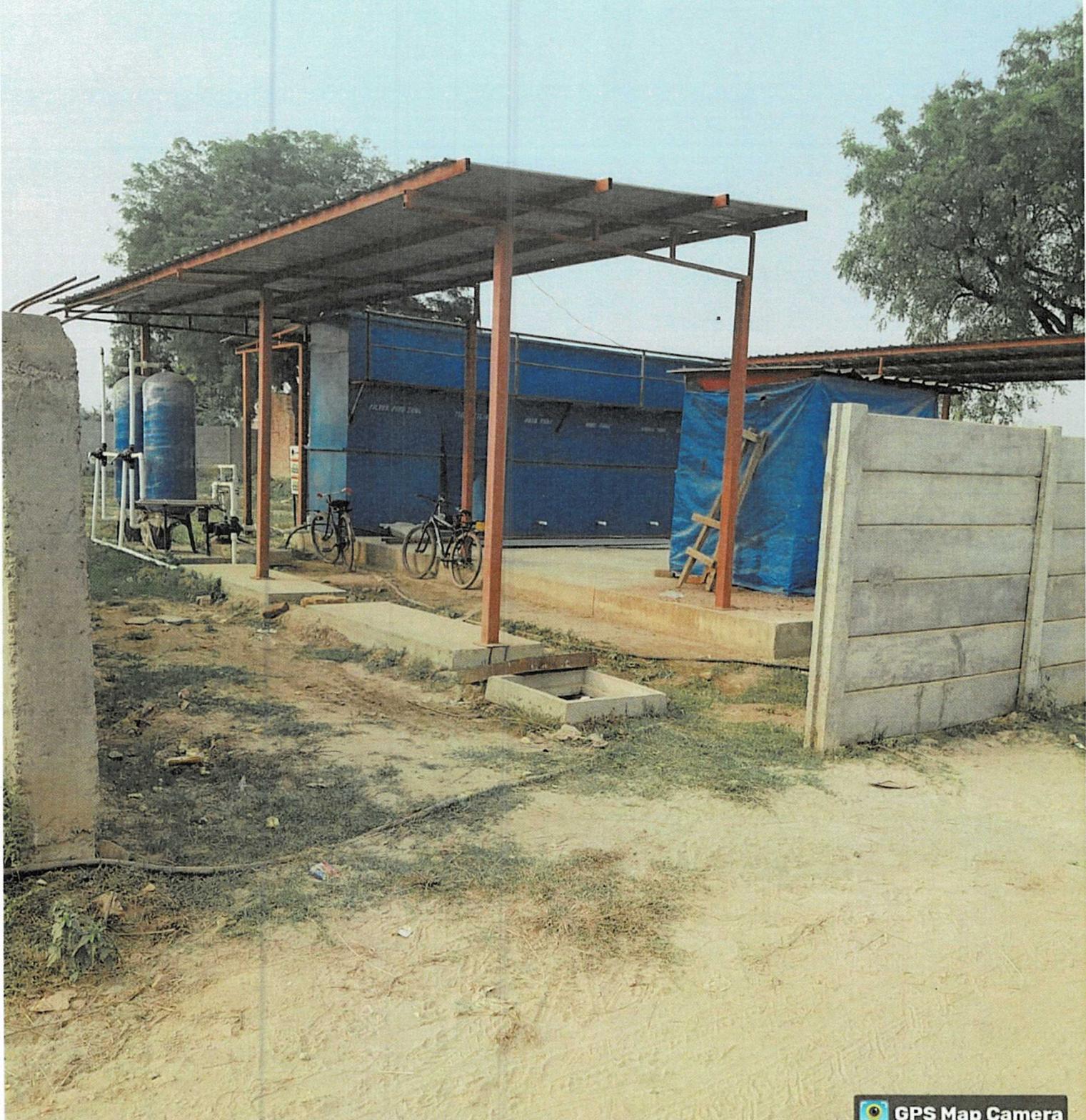
CERTIFIED THAT THE DEPONENT
Shri/Smt./Km. *Kishan Lal*
S/o, W/o, D/o, Sh. *Same as above*
R/o. *Same as above*
Identified by Shri/Smt. *Amar Nath (Adv)*
has solemnly affirmed before me at Delhi
on *04 NOV 2025* at Sl. No. *24/25*
that the contents of the affidavit which have
been read & explained to him are true and
correct to his knowledge.

Kishan Lal
DEPONENT

Oath Commissioner *A*

STP
366

ANNEXURE-A (9)



 GPS Map Camera

Ghaziabad, Uttar Pradesh, India 

Jfvm+f4w, Shahpur Bamheta, Ghaziabad, Uttar Pradesh 201002, India

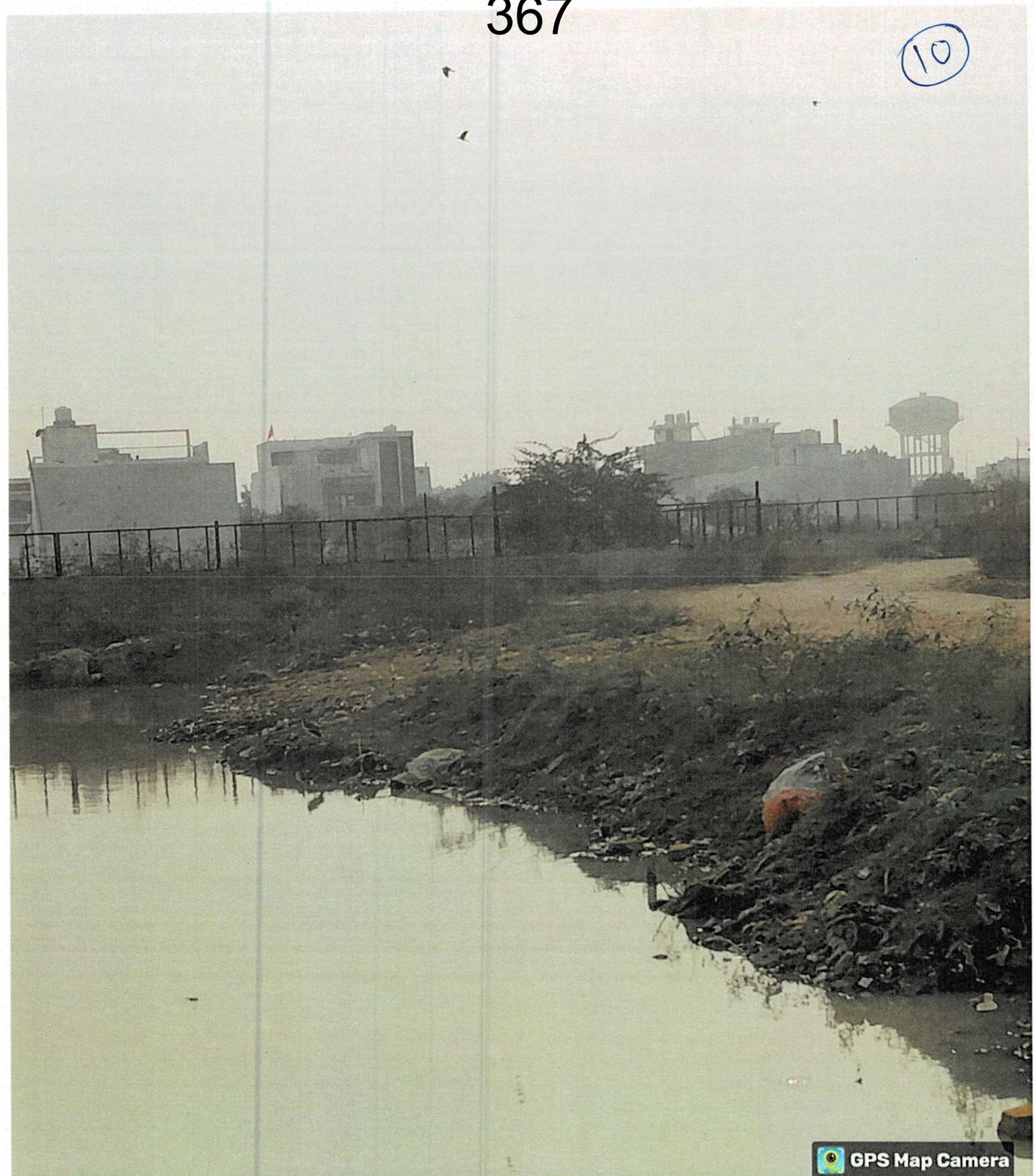
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Friday, 31/10/2025 03:26 PM GMT +05:30



367

10



GPS Map Camera

Ghaziabad, Uttar Pradesh, India 

Jaipuria Sunrise Greens, Near Bamheta, Shahpur Bamheta,
Ghaziabad, Uttar Pradesh 201002, India

Lat 28.642125° Long 77.480571°

Friday, 31/10/2025 03:25 PM GMT +05:30



368

11



GPS Map Camera



Ghaziabad, Uttar Pradesh, India 

Jaipuria Sunrise Greens, Near Bamheta, Shahpur Bamheta,
Ghaziabad, Uttar Pradesh 201002, India

Lat 28.642127° Long 77.480567°

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