

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
Original Application No.363 / 2022

In the matter of : -

Vikrant Tongad & Another	...	Applicants
Versus		
State of U.P and Ors.	...	Respondents

ADDITIONAL REPLY ON BEHALF OF
RESPONDENT NO.4, GREATER NOIDA
INDUSTRIAL DEVELOPMENT AUTHORITY.

The Respondent above named

Most Respectfully Showeth:

1, That the above said Original Application is pending for the consideration before this Hon'ble Tribunal. Earlier, a reply / Counter Affidavit on behalf of Respondent No.4 had been filed and the same is on record. The answering Respondent shall refer to and reply upon the said reply.

2. The above said case was listed before the Hon'ble Tribunal on 25.4.2024 when this Hon'ble Tribunal was pleased to observe in para

2

No. 5 that Respondent Nos.3 and 4 have not specifically mentioned about the remediation of all the violations in the above said area, particularly the one covered by the photographs. The Hon'ble Tribunal was pleased to give one month's time to file the additional reply.

3. It is submitted that Page Nos. 82, 89, 90, 91 and 92 of the Original application allege concretisation in the area of Greater Noida city. The additional reply, in regard to the photographs at the pages mentioned above is as under :

- (i). the photographs dt. 10.5.2022 that have been filed at Page Nos.91 and 92 of the O.A. show that the inter-locking tiles are touching the tree trunk. These inter locking tiles have been removed, which fact may be noticed in the photographs, which are filed as **ANNEXURE R-4/1 and R-4/2** respectively.
- (ii). from the photograph filed at Page 82 it is alleged that concretization is being done. It is submitted that at that stage the road works were being carried out. The road works since then have been completed and there is no concretization along the

road as alleged. On the contrary there is greenery. Copy of the photo is annexed hereto and marked as **ANNEXURE R-4/3**.

(iii). from the photograph at page 89 of the O.A. it is alleged that there concretisation. In response it is submitted that is submitted that there is no concretization. From the photograph at page 89 it can be noticed that in the Parking area, inter locking tiles had been laid. It is submitted that inter locking tiles have also been removed. Photograph of the area near the Yatharth Hospital is annexed hereto and marked as **ANNEXURE R-4/4** (in contrast to page 89 of the Original Application).

(iv). From the photograph at page 90 of the Original Application it is alleged that there is concretization. It is submitted that the photograph is of Noida area as typed on the photo itself. Therefore no additional reply is required to be made by Respondent no. 4 in regard to this photo at Pg 90.

4. It is also submitted that interlocking around the trees have been removed from all other places as well. It is also being ensured that the

mandate of the U.P. G.O. dated 23.08.20218 is adhered to. Wherever necessary only perforated tiles, fly ash bricks etc., as permissible, are used for the bare minimum foot path and the remaining portion is left vacant for plantation of grass, shrubs etc. In this manner, the generation of dust is minimised while percolation of water into the ground is equally ensured. It is further submitted that necessary orders are being issued to ensure that there is no concretization along the road anywhere in Greater Noida and wherever it is the same is removed and that the area alongside the road be developed as green by planting grass & shrubs etc.

5. The answering Respondent submits his unconditional apology for not having filed this Additional Reply within the time granted by this Hon'ble Tribunal in the Order dt.25.04.2024 and prays that in the premises, the present Additional Reply may kindly be taken on record.

RESPONDENT NO.4

through

Shivam Saksera
(Advocate for Resp. No. 4)

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
Original Application No.363 / 2022

In the matter of : -

Vikrant Tongad & Another ... Applicants
Versus
State of U.P and Ors. ... Respondents

AFFIDAVIT

I, Narottam Singh, S/o Late Sh. Gyan Singh, aged about 47 years, having A-7, Sector 23, Noida, presently at New Delhi, do hereby solemnly affirm and state as under :

1. That the Deponent is presently posted as Sr. Manager, Work Circle IV, with the Respondent Authority No.4 and as such I am acquainted with the facts deposed herein below.

2. I state that the accompanying additional reply has been drafted under my instructions. I have read the same and state that the contents thereof are true and correct to my knowledge as derived from the records of the Respondent no. 4, Authority.

3. That the Annexures are true copies of their respective originals.



I Identify the deponent who has Signed/Put T.I. in my presence

DEPONENT

VERIFICATION:

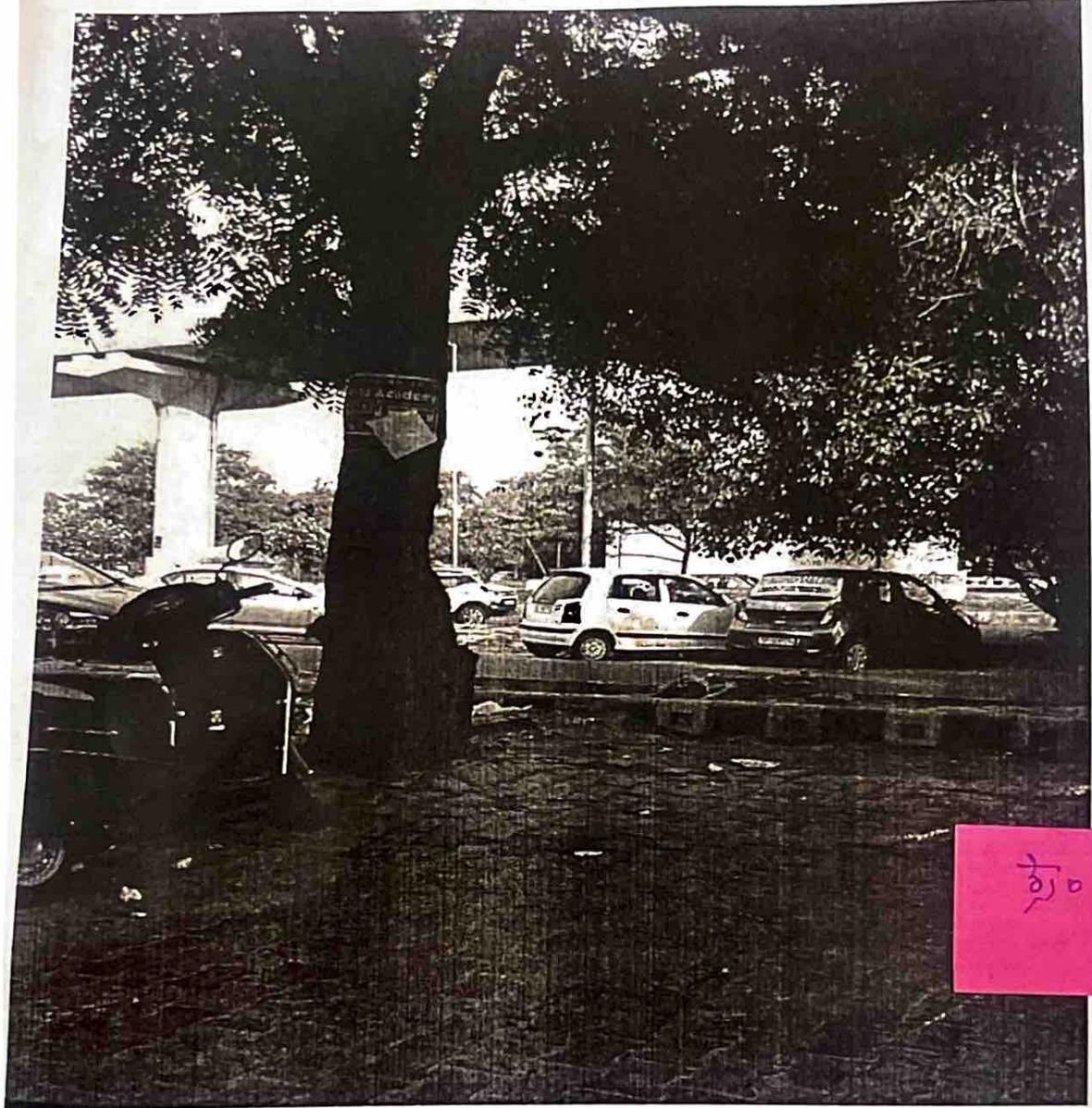
09 AUG 2024

Verified at New Delhi on _____ day of August, 2024 that the factual contents of this Affidavit are true and correct to my knowledge as derived from the records of the case and nothing stated therein is false and nothing material has been concealed there from. The last para is prayer to this Hon'ble Court.

DEPONENT



ATTESTED
A.N. Singh, Adv.
Notary Public
Govt. of India, New Delhi
09 AUG 2024



7/5/22

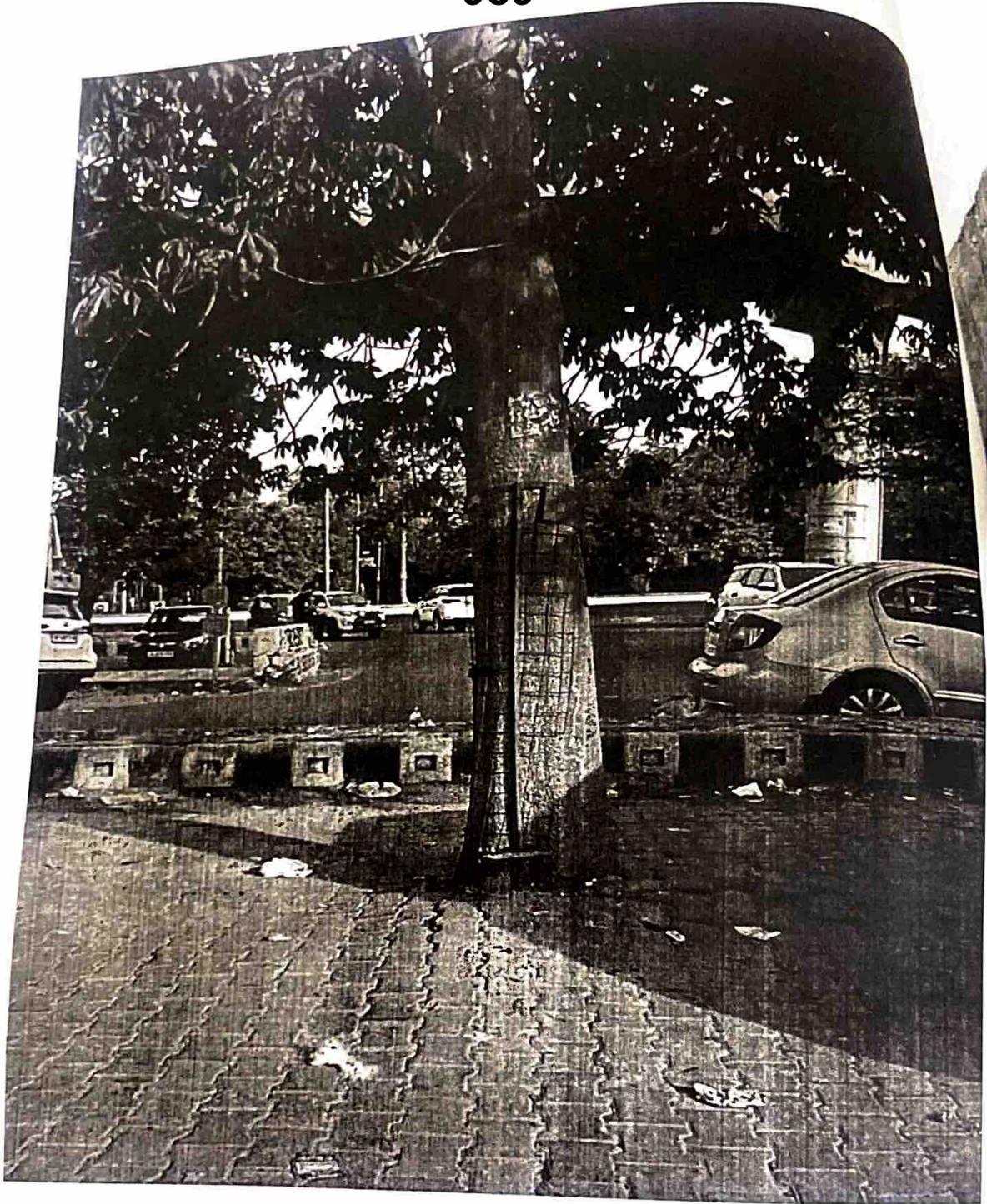
Concretization in Alpha Commercial Belt, Greater Noida. (10.05.2022)



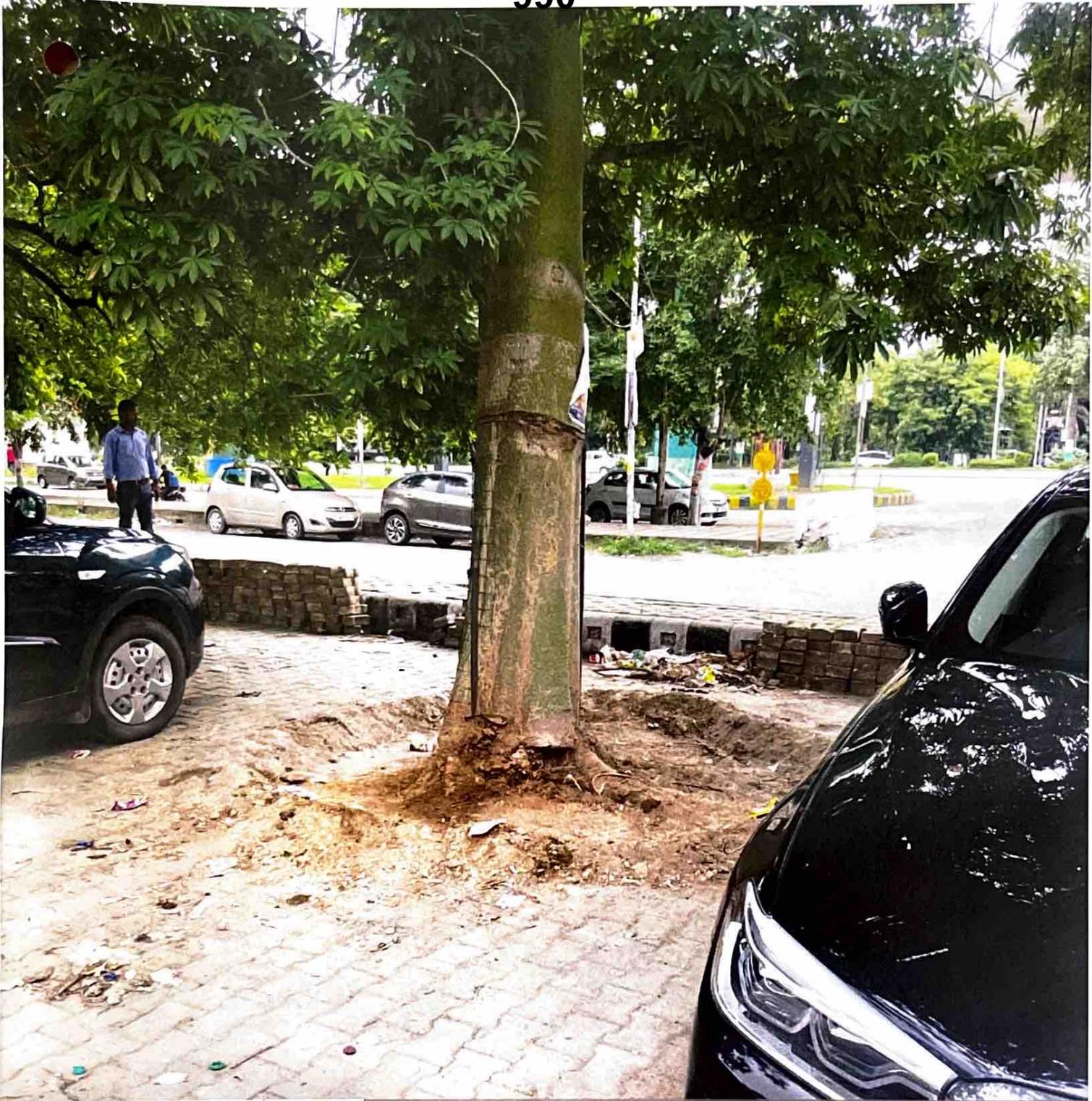
Greater Noida
Uttar Pradesh
India

2024-08-08(Thu) 05:04(PM)

29°C
84°F



Concretization in Alpha Commercial Belt, Greater Noida. (10.05.2022)



312, Alfa Marg, Alpha-1 Commercial Belt, Block E, Alpha 1, Greater Noida, Uttar Pradesh 201308, India

Greater Noida
Uttar Pradesh
India

28°C

82°F

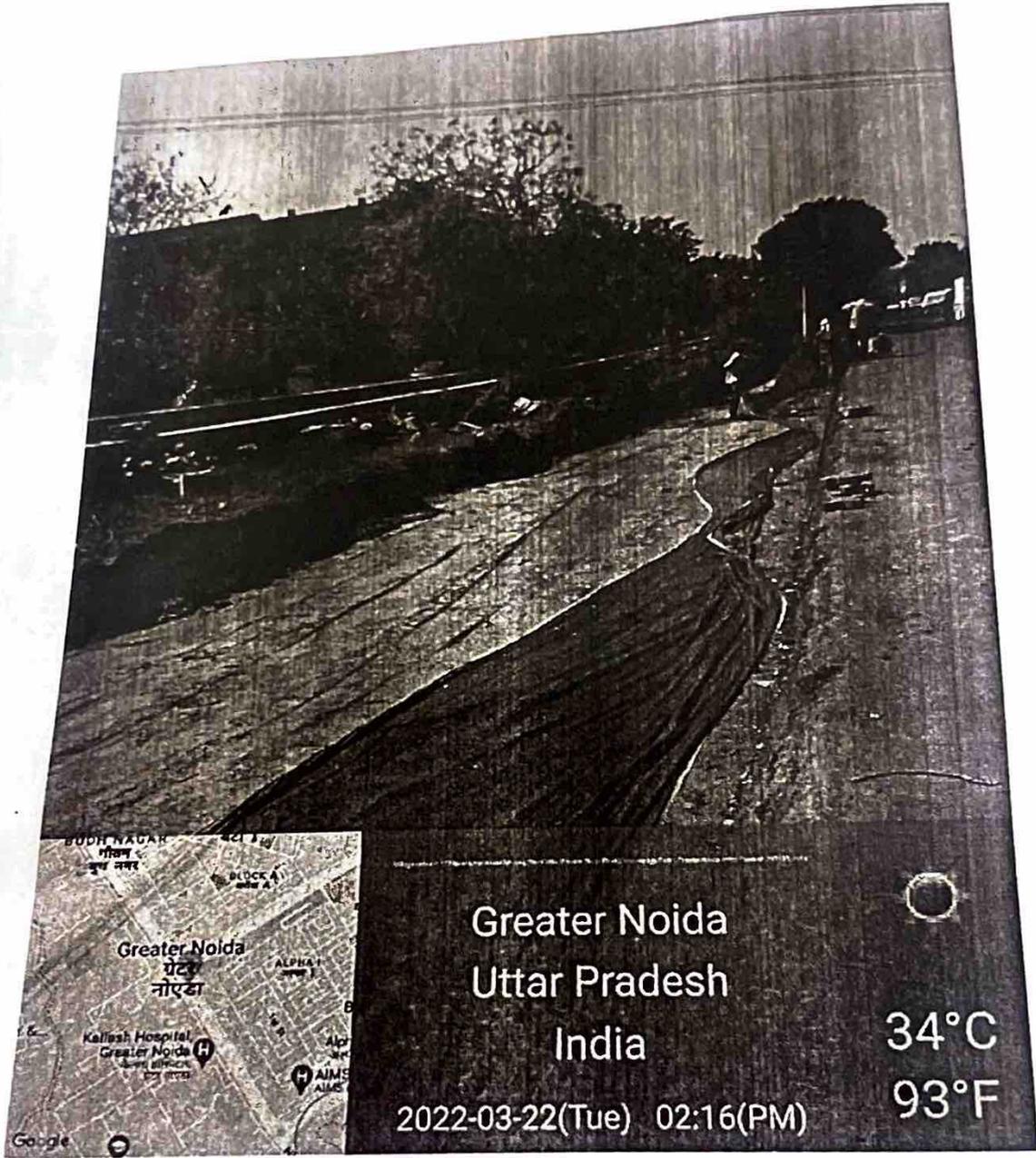
2024-08-08(Thu) 10:06(AM)

991

Annexure R 4/3

82
~~88~~

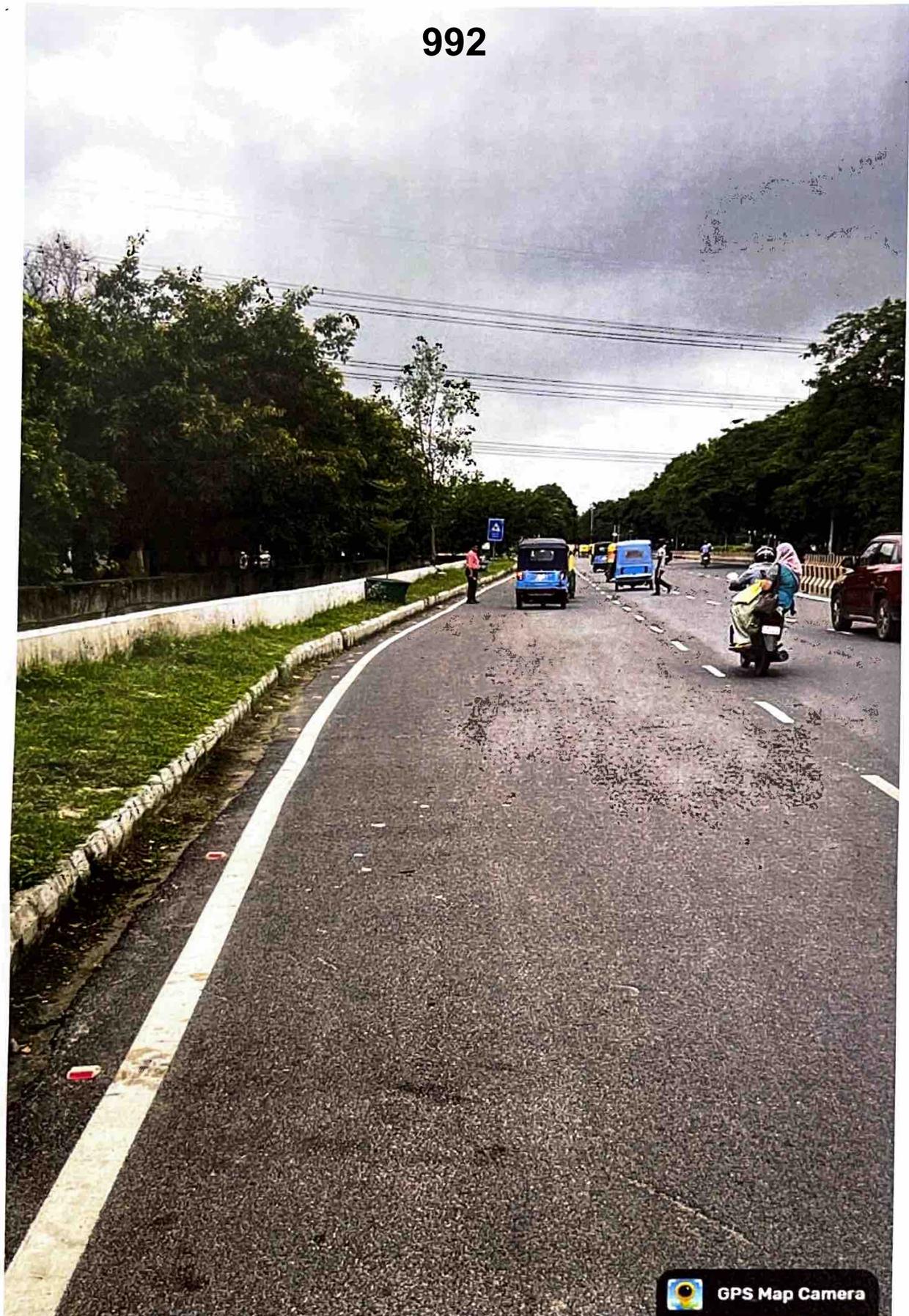
11



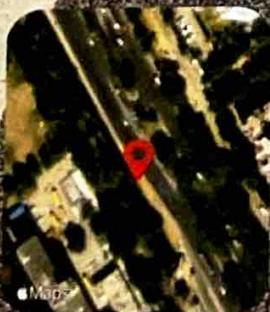
Roadberms being prepared for concretization in Greater Noida.

992

12



 GPS Map Camera



Greater Noida, UP, India

Institutional Area, Greater Noida, 201306, UP, India

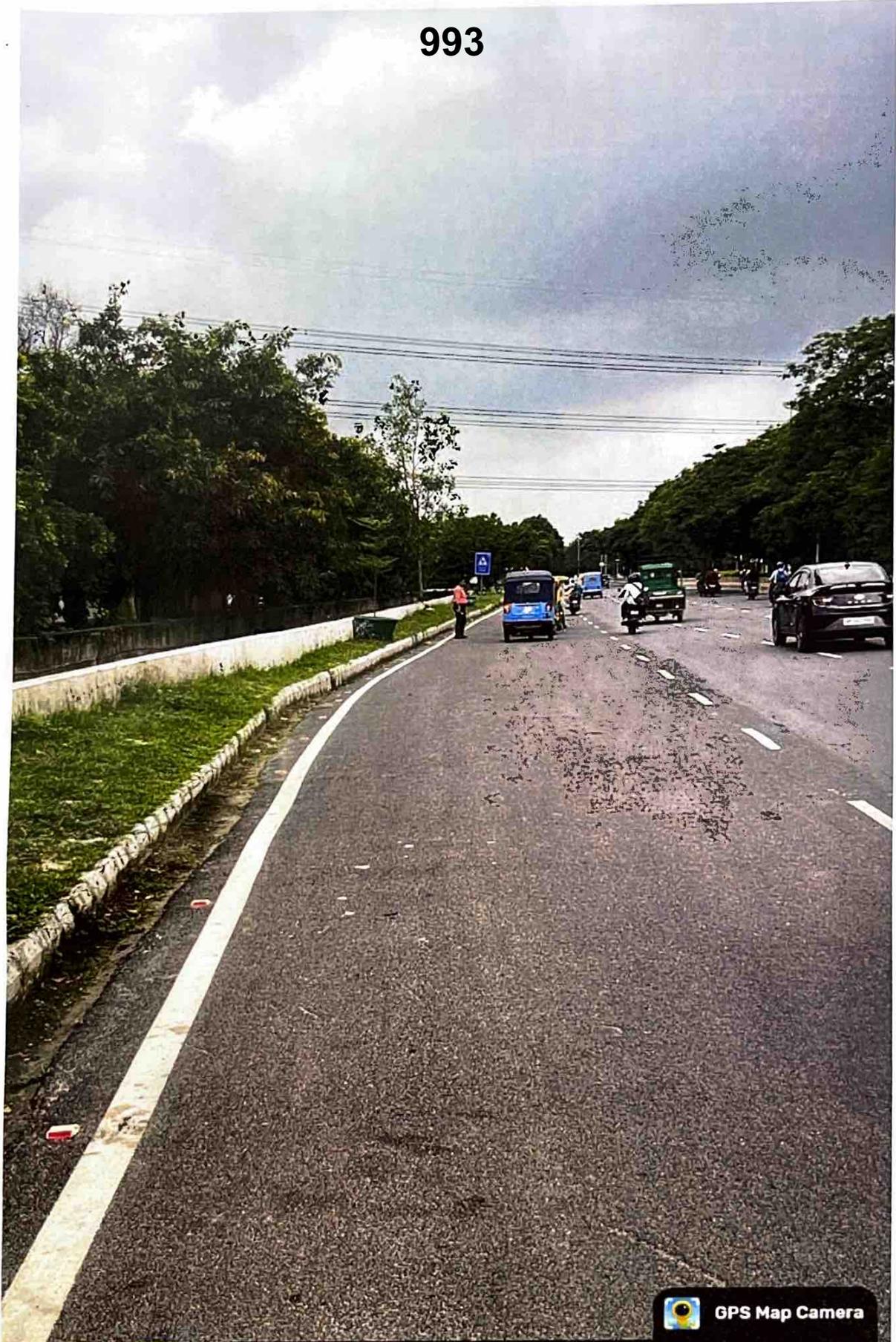
Lat 28.472354, Long 77.505186

08/08/2024 10:06 AM GMT+05:30

Note : Captured by GPS Map Camera

993

13



 GPS Map Camera



Greater Noida, UP, India

Institutional Area, Greater Noida, 201306, UP, India

Lat 28.472355, Long 77.505185

08/08/2024 10:06 AM GMT+05:30

Note : Captured by GPS Map Camera



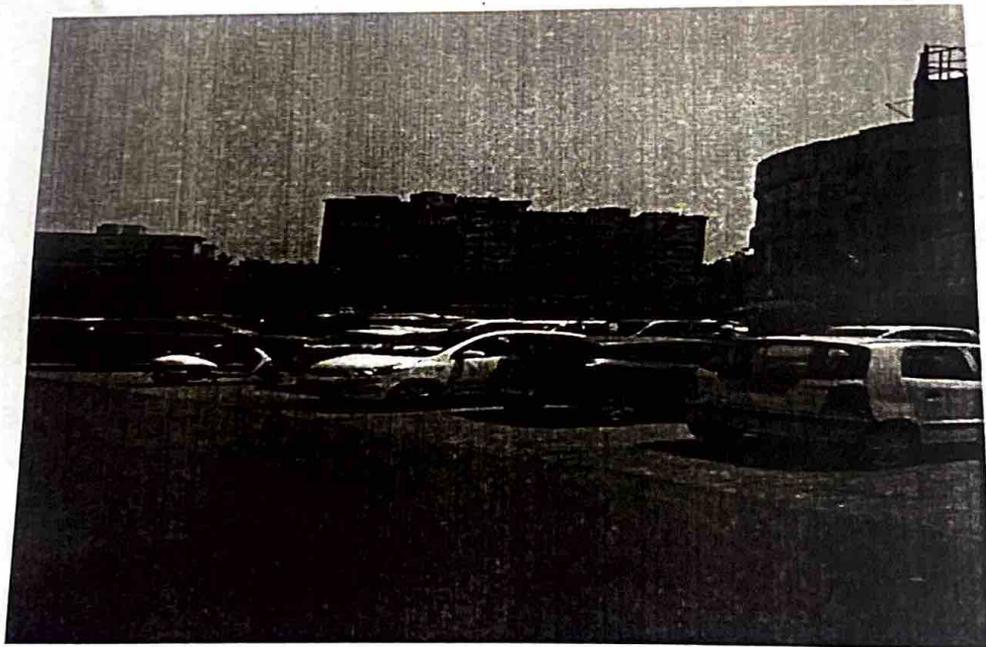
994

Greater Noida, UP, India
Institutional Area, Greater Noida, 201306, UP,
India
Lat 28.473734, Long 77.504331
08/08/2024 10:21 AM GMT+05:30
Note : Captured by GPS Map Camera





Entire roadberms been concretized near Yatharth Hospital in Greater Noida.



Entire roadberms been concretized near Yatharth Hospital in Greater Noida.

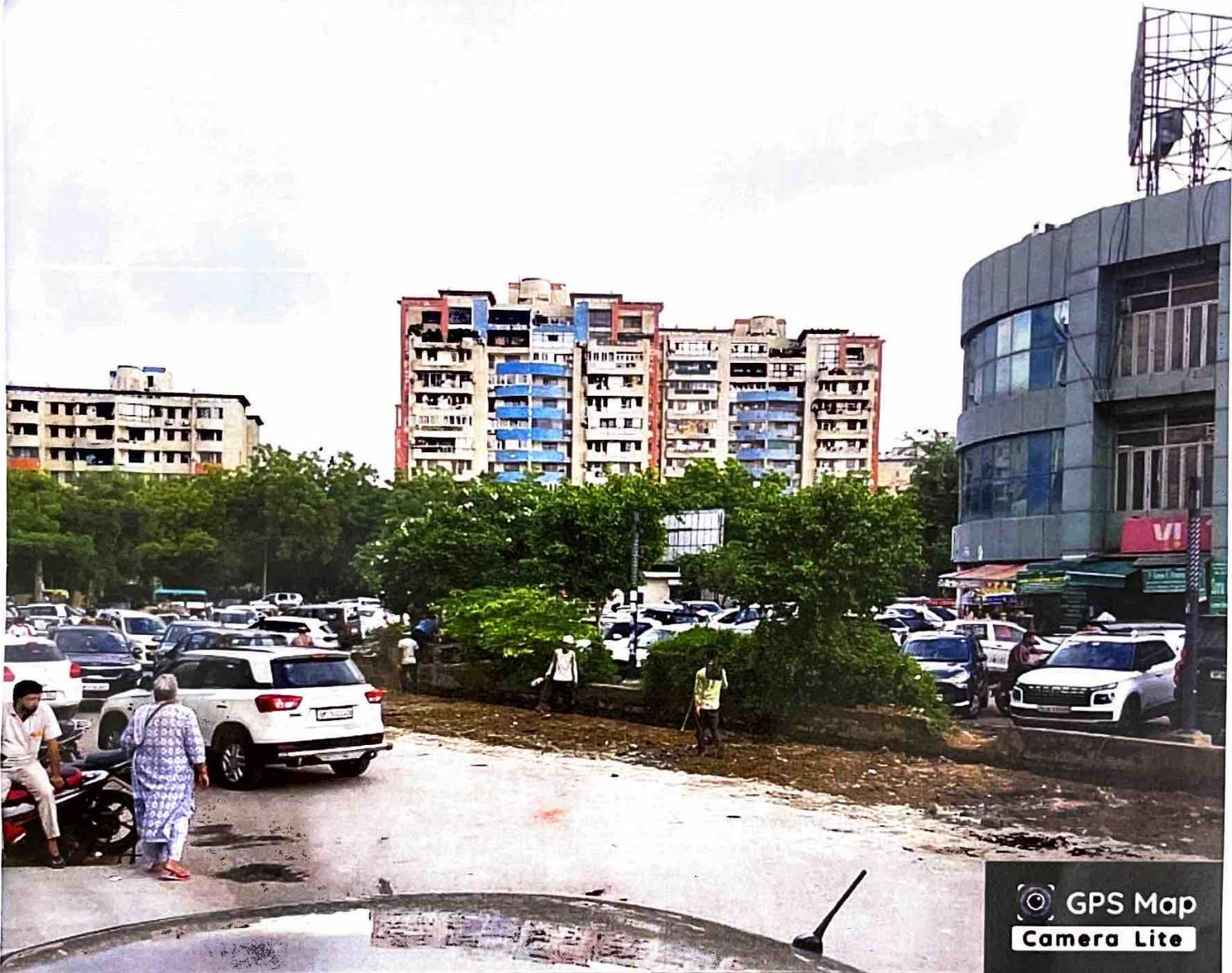


GPS Map Camera

Check In ग्रेटर नोएडा, उत्तर प्रदेश, भारत
FG25+JM9, ब्लॉक A, अंसल गोल्फ लिंक्स 1, ग्रेटर नोएडा, उत्तर प्रदेश 201310, भारत
Lat 28.451518°
Long 77.509357°
08/08/24 05:07 PM GMT +05:30



Goole



GPS Map
Camera Lite

FG25+JM9, Block A, Ansal Golf Links 1, Greater Noida, Uttar Pradesh
201310, India

Latitude

28.4516183°

Local 05:07:53 PM

GMT 11:37:53 AM

Longitude

77.50938977°

Altitude 198 meters

Thursday, 08.08.2024

Note : d-222



998



GPS Map Camera

Greater Noida, Uttar Pradesh, India

FG25+JM9, Block A, Ansal Golf Links 1, Greater Noida, Uttar Pradesh 201310, India

Lat 28.451585°

Long 77.509314°

08/08/24 05:05 PM GMT +05:30

Google

