

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

OA No. 628/2024

IN THE MATTER OF:

Alok Mohan

Applicant

Versus

Escorts Kubota P Ltd & Ors.

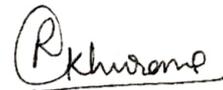
Respondent

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Dated: 29.10.2025

Through



Rahul Khurana, Advocate
A-174 A, 2nd Floor, Defence Colony
New Delhi, 09811894060

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OA No. 628/2024

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Respondent

Additional Affidavit of Sandeep Singh, Regional Officer, Haryana State Pollution Control Board, Faridabad in compliance of order dated 09.09.2025 on behalf of Respondent No.1 and 3

MOST RESPECTFULLY SHOWETH:

I, the deponent in the aforesaid official capacity states as under:

1. The present matter pertains to an application, complaining against the violation of environmental norms by Escorts Kutoba Limited, Faridabad.
2. That on the last date of hearing on 09.09.2025, the Hon'ble Tribunal ordered the following:

"1. Applicant during the hearing has submitted that the area where the house of the applicant and industrial unit of the respondent/project proponent is located is residential area. Though, Counsel for the project proponent has referred to the

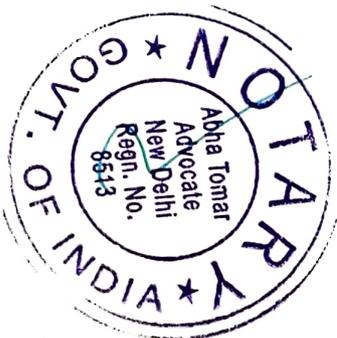


notification dated 12.02.1970 annexure R2/1, page no.190 but it is only a proposal for amendment of the plan. No final notification has been placed on record.

2. Respondent no. 1 and 3 are directed to disclose if the area where house of the applicant and unit of the respondent no.2 is located fall within the residential or industrial area and if it is the residential area whether industrial activity is permissible in the residential area. Respondent no. 1 and 3 are also directed to make the above aspect clear by filing the affidavit supported by documents within three weeks.

10. List on 30.10.2025."

3. It is submitted that in-compliance order dated 09.09.2025, the Haryana State Pollution Control Board (HSPCB), Faridabad Region and the Deputy Commissioner, Faridabad have sought clarification from the Municipal Corporation, Faridabad (MCF), and the District Town Planner (Planning), Faridabad [DTP(P)], regarding the land use status of the site in question—specifically, whether it falls under a residential or industrial zone. Copy of letter dated 18.09.2025 sent by HSPCB to the Commissioner, MCF and the District Town Planner (Planning), Town & Country Planning Department, Faridabad is annexed as **Annexure-R/1**. Copy of letter dated



08.10.2025 sent by Deputy Commissioner, Faridabad to the Commissioner, MCF and the District Town Planner (Planning), Town & Country Planning Department, Faridabad is annexed as **Annexure-R/2.**

4. That vide letter dated 03.10.2025, the District Town Planner, Faridabad (Planning) has informed that as per Final Development Plan Faridabad 2011 A.D, (Published on 17.12.1991), the site in question was falling within Industrial belt of Sector-15A, Faridabad. Further, it is informed that as per published Final Development Plan Faridabad 2031 A.D. (published on 14.03.2018), the site in question is falling within Mixed Land use (Residential/Industrial/Commercial) belt of Sector-15A, Faridabad.

5. That vide letter dated 10.10.2025, the Planning Expert, Municipal Corporation, Faridabad has informed that that first Final Development Plan for Faridabad was published vide notification no. 2930-2TCP-65 dated 19.01.1966 published in Punjab Government (Extra Ordinary) dated 22.01.1966 and subsequent revised development plan published vide notification no. 10427-1C1-74/29529 dated 23.09.1974 published in Haryana Government (Extra Ordinary) dated 24.09.1974,

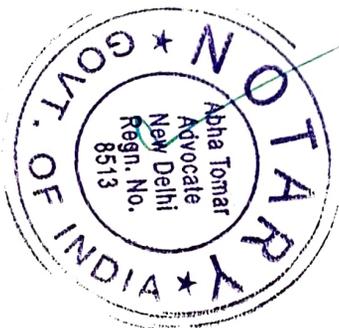


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Final Development Plan for Faridabad-Ballabgarh Controlled Area for 2011 AD published in Haryana Government Gazette (Extra Ordinary) dated 17.12.1991 and subsequent development plan published vide notification no. CCP(NCR)/FDB/FDP-31/2018/694 dated 14.03.2018, a strip of land along Delhi Mathura road (earlier NH-2, now NH-44) in Sector - 15A industrial land use is specified (in FDP dated 14.03.2018 it is shown as mixed land use). Sector 15A might be acquired by Urban Estate Department for HUDA and developed / residential plots have been allotted by HSVP.

It has been further informed that Corporation vide memo no. MCF/CTP/2024/459 dated 09.09.2024 has issued occupation certificate for industrial building constructed at 18/4 Delhi Mathura Road, Faridabad belongs to M/s Escorts Ltd. (now Escorts Kubota India Pvt. Ltd.) on the basis of conveyance deed executed between Governor of Haryana and M/s Escorts Ltd. for setting up industry, consent to establish automobile manufacturing unit by M/s Escorts Ltd. by Haryana State Pollution Control Board bearing that office memo no. HSPCB/Consent/313091420FDBDCT07164427 dated 25.01.2020.

Copy of letter dated 03.10.2025 of the District Town Planner, Faridabad (Planning) and copy of letter dated 10.10.2025 issued by the Planning



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Expert, MCF are annexed as **Annexure-R/3 (Colly)**.

In view of the submissions made herein above, as per information provided by concerned authorities i.e. DTP, Faridabad (Planning) and the Municipal Corporation of Faridabad, industrial use of the plot in question of respondent unit is permissible.


DEPONENT

VERIFICATION:

29 OCT 2025

Verified at New Delhi on this 29th day of October 2025 that the contents of paras no. 1 to 5 of my affidavit are true and correct to the best of my knowledge based on information derived from office record which I believe to be true. Contents of para no.6 are prayer made before this Hon'ble Tribunal. No part of it is false and nothing material has been concealed therein.

Verify the deponent's statement who has signed in my presence




DEPONENT

Certified that the foregoing statement was declared on solemn affirmation before me which has been read over to the deponent who has admitted

It as correct  Notary DELHI

29 OCT 2025



**HARYANA STATE POLLUTION
CONTROL BOARD**

Faridabad Region, Opp. Hewo Appmt., Sector-
16A, Faridabad

Email: hspcbrofr@gmail.com Website:
www.hspcb.gov.in



No/HSPCB/FR/2025/ 965 - 67
To

Dated: 18/09/2025

The Commissioner,
Municipal Corporation, Faridabad

The District Town Planner, (P)
Town and Country Planning Department, Faridabad

Sub: Compliance with directions to clarify land use status of the area in question - Residential or Industrial - and permissibility of industrial activity therein.

Ref: Hon'ble NGT Order dated 09.09.2025.

In this regard, it is submitted that, as per the directions of the Hon'ble National Green Tribunal (NGT) in its order dated 09.09.2025, a clarification is required on whether the unit M/s Escorts Kubota India Pvt. Ltd, located at 18/4 Mathura Road, Faridabad (Latitude: 28.389323, Longitude: 77.314083), located within a residential or industrial zone/area.

In view of the above, you are kindly requested to clarify the land use status of the said area—that is, whether it falls under a residential or industrial area—along with the relevant supporting documents. So that the same may be compiled and submitted before the Hon'ble NGT in compliance with its directions.

DA/ Copy of order dated 09.09.2025.


**Regional Officer
Faridabad Region**

Dated: 

No/HSPCB/FR/2025/

A copy of above is forwarded to the Deputy Commissioner, Faridabad for information and necessary action please.


**Regional Officer
Faridabad Region**



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Office of The Deputy Commissioner, Faridabad

ANNEXURE R/2 8

Mini Secretariat, Sector-12, Faridabad

Office Phone:- 0129-2227936, 2226604, Email Id - dcfbd@hry.nic.in

To

1. Commissioner, Municipal Corporation, Faridabad.
2. District Town Planner, (P) Town and Country Planning Department, Faridabad.

No. LFA/ 4016 -17 /G-II/2025 Dated:- 08-10-2025

Subject: Compliance with directions to clarify land use status of the area in question- Residential or Industrial – and permissibility of industrial activity therein.

Hon'ble NGT Order dated 09.09.2025.

Please find enclosed herewith a copy of letter No. HSPCB/FR/2025/965-67 dated 18.09.2025 received from RO, Haryana State Pollution Control Board, Faridabad.

You are requested to kindly clarify the land use status of the unit M/s Escorts Kubota India Pvt. Ltd, 18/4 Mathura Road, Faridabad (Latitude: 28.389323, Longitude: 77.314083), located within a residential or industrial zone/area to RO, HSPCB, Faridabad under intimation to this office, so that the same may be complied and submitted before the Hon'ble NGT to comply with the directions in this regard.

This may kindly treated as most urgent.

Encl: As above.


for Deputy Commissioner,
Faridabad.

Endrst No. LFA/ 4018 /G-II/2025 Dated: 08-10-2025

A copy is forwarded to RO, HSPCB, Faridabad for information and necessary action please.


for Deputy Commissioner,
Faridabad.



Office of The Deputy Commissioner, Faridabad

Mini Secretariat, Sector-12, Faridabad

Office Phone:- 0129-2227936, 2226604, Email Id - dcfbd@hry.nic.in

To

RO, HSPCB,
Faridabad.

Memo. 4056 /LFA/G-II /2025 dated: 27/10/2025

Subject: Compliance with directions to clarify land use status of the area in question- Residential or Industrial and permissibility of Industrial activity therein.

Please find enclosed herewith a copy of letter No. 4890 dated 03.10.2025 received from DTP(P), Faridabad and letter No. MCF/CTP/2025/1081 dated 10.10.2025 from Commissioner, MC, Faridabad on the subject cited above.

You are, therefore, requested to comply the directions of the Hon'ble NGT and file the status report as per above letters on behalf of Deputy Commissioner, Faridabad also immediately under intimation to this office.

Encl: As above.


for Deputy Commissioner,
Faridabad.

Endst. No. 4057-59/LFA/G-II /2025 Dated:- 27/10/2025

A copy of above is forwarded to the following for information please:-

1. Commissioner, Municipal Corporation, Faridabad
2. DTP(P), Faridabad.
3. ADA, DC Office, Faridabad.


for Deputy Commissioner,
Faridabad.

201 412

District Town Planner, Faridabad (Planning)

DEPARTMENT OF TOWN AND COUNTRY PLANNING

HSVP Office Complex, Sector-12, Faridabad, Tel No. 0129-2986341

E-mail: ntp9.faridabad.tcp@gmail.com

To,

Regional officer,
Haryana Pollution Control Board,
Faridabad Region, Sector-16A, Faridabad.

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CTM/LTA
P
02/10/25

Memo no.

Dated:-

Subject : Compliance with directions to clarify land use status of the area in question- Residential or Industrial- and permissibility of Industrial activity therein.

Ref: Your office memo no. HSPCB/FR/2025/965-67 dated 18.09.2025.

On the subject cited above, it is informed that as per published Final Development Plan Faridabad 2011 A.D, (Published on 17.12.1991), the site in question was falling within Industrial belt of Sector-15A, Faridabad. Further, it is informed that as per published Final Development Plan Faridabad 2031 A.D. (published on 14.03.2018), the site in question is falling within Mixed Land use (Residential/Industrial/Commercial) belt of Sector-15A, Faridabad. The part copy of both the Final Development Plans Faridabad i.e. 2011 A.D. and 2031 A.D. showing the location of the site in question in red colour, are sent herewith for your information and further necessary action, please.

DA/As above

1
District Town Planner,
Faridabad.

Endst. No. 4890

Dated: 3/10/25

✓ A copy is forwarded to Deputy Commissioner, Faridabad for information, please.

ME
District Town Planner,
Faridabad.



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Municipal Corporation, Faridabad
 B.K. Chowk N.I.T Faridabad -121001, Haryana-India
 Tel. : 0129-2411649, 2411664, 2415549
 Fax : 0129-2416465



From

Commissioner,
 Municipal Corporation,
 Faridabad.

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17/10/25

CTM/LFA

15/10/25

To

Deputy Commissioner,
 Faridabad.

Memo No. MCF/CTP/2025/ 1081

Dated: 10/10/2025

Sub: Compliance with the directions issued by Hon'ble NGT to clarify land use status of the area in question – residential or industrial and permissibility of industrial activities therein.

Kindly refer to your office memo no. 4002/G-1/2025 dated 25.09.2025 in the subject matter. In this context it is informed that first Final Development Plan for Faridabad was published vide notification no. 2930-2TCP-65 dated 19.01.1966 published in Punjab Government (Extra Ordinary) dated 22.01.1966 and subsequent revised development plan published vide notification no. 10427-1C1-74/29529 dated 23.09.1974 published in Haryana Government (Extra Ordinary) dated 24.09.1974, Final Development Plan for Faridabad-Ballabgarh Controlled Area for 2011 AD published in Haryana Government Gazette (Extra Ordinary) dated 17.12.1991 and subsequent development plan published vide notification no. CCP(NCR)/FDB/FDP-31/2018/694 dated 14.03.2018, a strip of land along Delhi Mathura road (earlier NH-2, now NH-44) in Sector – 15A industrial land use is specified (in FDP dated 14.03.2018 it is shown as mixed land use). Sector 15A might be acquired by Urban Estate Department for HUDA and developed / residential plots have been allotted by HSVP.

This Corporation vide memo no. MCF/CTP/2024/459 dated 09.09.2024 has issued occupation certificate for industrial building constructed at 18/4 Delhi Mathura Road, Faridabad belongs to M/s Escorts Ltd. (now Escorts Kubota India Pvt. Ltd.) on the basis of conveyance deed executed between Governor of Haryana and M/s Escorts Ltd. for setting up industry, consent to establish automobile manufacturing unit by M/s Escorts Ltd. by Haryana State Pollution Control Board bearing that office memo no. HSPCB/Consent/313091420FDBDCTO7164427 dated 25.01.2020 therefore the question arises by RO HSPCB vide that office memo no. 965-67 dated 18.09.2025 is not maintainable.

This is for your information and taking further necessary action please.



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Municipal Corporation, Faridabad
 B.K. Chowk N.I.T Faridabad -121001, Haryana-India
 Tel. : 0129-2411649, 2411664, 2415549
 Fax : 0129-2416465



Santosh
 Planning Expert,
 For Commissioner.

Encl. As above.

Endst. No. MCF/CTP/2025/

Dated:-

A copy of above is forwarded to Regional Officer, Faridabad region, Haryana State Pollution Control Board, Opposite HEWO Apartment, Sector -16A, Faridabad for information in reference to that office memo no. 965-967 dated 18.09.2025.

/

Planning Expert,
 For Commissioner.

Endst. No. MCF/CTP/2025/

Dated:-

A copy of above is forwarded to District Attorney, MCF for information in reference to that office memo no. 2586 dated 26.09.2025.

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Planning Expert,
 For Commissioner.

Endst. No. MCF/CTP/2025/

Dated:-

A copy of above along with Deputy Commissioner, Faridabad office memo no. LFA/4002/G-1/2025 dated 25.09.2025 is forwarded to Estate Officer, HSVP and LAO, Urban Estate, Faridabad and District Town Planner (Planning) Faridabad for information and with a request to provide the requisite information relates to their offices directly to Deputy Commissioner, Faridabad, please.

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Planning Expert,
 For Commissioner.