

**IN THE HON'BLE NATIONAL GREEN TRIBUNAL  
(PRINCIPAL BENCH AT NEW DELHI)**

**IN O.A. No. 793 of 2023**

IN THE MATTER OF:

Environment Protection Society (Regd.)                      Applicant

Versus

Ministry of Environment, Forest and Climate Change and Ors.  
Respondents

**Replication to additional reply of  
Respondent no. 6 dated  
03.03.2025 alongwith additional  
submissions that applicant wants  
to bring to the notice of all for  
adjudication of the matter.**

**Respectfully Showeth:**

1. That the **issues for adjudication** before the Hon'ble NGT are enumerated **at page 6** of the paperbook and the **reply filed by Respondent No. 6 is silent on the issues** before the hon'ble NGT.

That it is apposite to reproduce para no. 4 of Order dated 08.01.2023 of hon'ble NGT hereunder as:

*“Prima facie, the averments made in the application raise questions relating to environment arising out of implementation of the enactments specified in Schedule-I to the National Green Tribunal Act, 2010.”*

2. That the environmental value of full grown green trees is given on **page no. 206** of the paperbook.

3. That GMADA has paid Rs.137 crores (Rupees One Hundred Thirty Seven Crores) as compensation for allegedly non-existent guava trees. GMADA is a cash rich authority.
4. That there has been total lack of application of mind by the authorities for planning of these projects. Merely coming before the hon'ble NGT for adjudication of the issues involved, the authorities have been able to reduce to half, the number of full grown green trees to be cut.
5. That **subject to the condition** that the Chief Administrator GMADA gives written undertaking that GMADA will deposit the environmental loss value of full grown green trees as may be fixed by this hon'ble NGT, the applicant will have no objection for carrying out the widening of road where metalled width of the road is being increased from 7.5 m to 15 m, i.e.
  - (a) Widening of metalled width of road from 7.5 m to 15 m Kumbra Chowk to Bawa White House, Phase 11, SAS Nagar.
  - (b) Widening of metalled width of road from 7.5 m to 15 m Sector 49/64 junction to Sector 48/65 junction SAS Nagar.
6. That the following suggestions may be considered to resolve the issue of widening of roads and at the same time preserving environment:-
  - (i) Whether it is advisable to cut full grown green trees where proposed widening of metalled portion of the road is only 1.5 ft on either side?

(ii) There is a provision of slow carriage way behind the tree rows on all roads of old sectors which can be utilized to decongest traffic.

(iii) Applicant has got all the roads of old sectors measured with Mr. Mehmi, X.En. and his SDOs of GMADA. All roads of old sectors are of 14 m metalled width and tree lanes have been planted just on the edge of the metalled portion. Any attempt to widen the metalled portion by one and a half feet on either side will result in cutting/felling of at least **30,000 full grown green trees**. Cutting/felling of such large number of trees will lead to genocide of human life/bio-diversity.

All the connecting roads from Chandigarh have also been got measured by Mr. Mehmi, X.En. and his SDOs of GMADA alongwith members of the applicant society and are of 14 m to 14.5 m metalled portion with slow carriage way duly constructed behind the rows separating the slow traffic from fast moving traffic.

(iv) Hon'ble Supreme Court in a recent order has observed that to restore the environment, it takes 100 years after plantation of trees.

(v) The road from the SSP chowk to Mohali village can be easily converted into dual carriage way by installing one feet wide concrete curve channels (in

middle of existing metalled portion of the road. The dual carriage way can very easily be constructed with approximately <sup>Rs</sup> 20 lacs and it will save Rs.12 crores for the State Authorities/GMADA. **In addition, no tree will have to be cut on this road.**

Place: Mohali  
Date: 14.04.2025



**President Applicant**  
**Environment Protection Society (Regd.)**  
**S.A.S. Nagar**

Through Counsel



**SHRI KANT RATTAN**  
**ADVOCATE**  
**COUNSEL FOR THE APPLICANTS**