

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
OA No. 209/2023

IN THE MATTER OF:-  
KAPIL DEV & ANR

...APPLICANT

VERSUS

MUNICIPAL CORPORATION, LUDHIANA & ORS ...RESPONDENTS

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2.	<b>ANNEXURE R1</b> Copy of Photographs of Green Belt created by Municipal Corporation, Ludhiana.	

Filed Through

Place: New Delhi

Date: \_\_.07.2023

**NAGINDER BENIPAL**

Advocate

D/1625/2009

Ch No. 403, Lawyers Chamber Block-I,

Delhi High Court, New Delhi-110003

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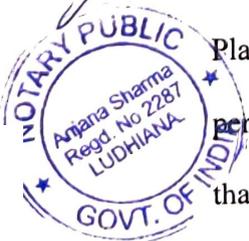
IT IS MOST RESPECTFULLY SHOWETH:

1. The undersigned is posted as Commissioner and thus filing the reply as respondent.
2. That this Hon'ble Tribunal vide order dated 28.03.2023 had directed:

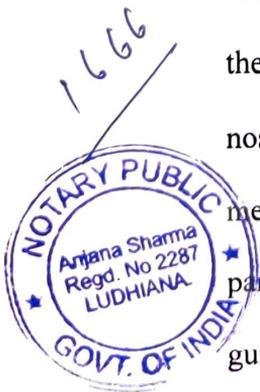
*"3. Prima facie, the averments made in the application raise substantial questions relating to environment arising out of the implementation of the enactments specified in Schedule I to the National Green Tribunal Act, 2010. Let Notices of the application be issued to the respondents.*

*4. Ms. Shena Aggarwal, Commissioner, Municipal Corporation, Ludhiana and Ms. Surabhi Malik, IAS, Deputy Commissioner, Ludhiana and CEO, Ludhiana Smart City Limited, who are present in O.A. 793/2022 titled "Council of Engineers & Ors. Vs. State of Punjab & Ors.", have accepted notice and they seek adjournment for filing of their replies/responses to the application."*

3. That the applicants herein have alleged that Sarabha Nagar and Model Town Extension, Ludhiana have been developed under the Municipal Town Planning Scheme and the impugned areas are Green Belts/Leisure Valley as per TP scheme as well as Master Plan of Ludhiana. It has also been alleged that Municipal Corporation, Ludhiana has constructed extension office along with approach road as well as Scrap Yard/Dump Yard/Store in land of green belt (Leisure Valley). Some private persons have also encroached by raising constructions on green belts at Model Town Extension Funeral Ground Road in violation of law.



4. It is submitted that Municipal Corporation Ludhiana had constructed the office building of Zone D at Sarabha Nagar along Sidhwan Canal, Ludhiana in the year 2000 and no scrap yard/ dump yard/ store has been constructed in land of green belt (Leisure Valley). That Municipal Corporation Ludhiana has developed a green belt on the barren/ abandoned land situated at the backside of Zone D, under Smart City Mission. That M.C, Ludhiana has also undertaken the work of refurbishment of Leisure Valley under Smart City Mission. The total area of Leisure Valley is spread over around 7.25 acres (29300 sqm) of land and hundreds of people daily visit the Leisure Valley along with their families for morning and evening walks. The development of green belt has been duly appreciated by citizens of Ludhiana.
5. It is submitted that the work has been completed and the green area has been developed with 7300 Plants and 475 number of trees with provisions for irrigation system and recharging wells. Out of the total area of 29300 sqm of leisure valley, an area of about 1400 sqm has been developed for parking of four wheelers (cars) and two wheelers which is only 4.77% of the total area of Leisure Valley. Further this parking is only for the visitors coming to the leisure valley and is not a commercial parking in any way. About 7775 nos. of new plants have been planted in the Leisure Valley. It is pertinent to mention herein that no old plant/ tree has been damaged or axed in the parking area and all the trees have been planted/ protected as per NGT guidelines O.A.No. 62/2021.
6. It is submitted that the encroachments in Model Town Extension near funeral ground, is under the Jurisdiction of Improvement Trust Ludhiana.
7. That Municipal Corporation Ludhiana has developed various green belts in Ludhiana under 15<sup>th</sup> Finance Commission and Ludhiana Smart City Mission. The Water Front – 1, Water Front – 2, Leisure Valley, Mini Rose Garden and

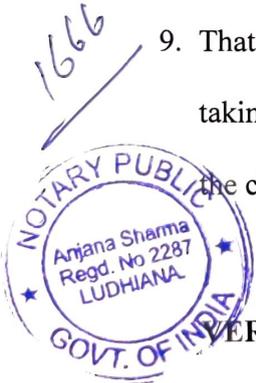


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parks in EWS Colony have been developed under Smart City Mission and green belt along Sua Road Barewal, park in Barewal Awana village, Water Front from Dugri road to Dhuri Railway Line along Sidhwan Canal, green belt on both sides of old GT Road from Sherpur Chowk to Jalandhar Bypass Chowk has been developed under 15th Finance Commission funds. More than 1,00,000 plants and shrubs have been planted in these green belts which were abandoned or vacant lands. Photographs of the Green Belt created by Municipal Corporation Ludhiana are annexed herewith as **ANNEXURE R1**.

8. That Municipal Corporation Ludhiana plants about 30,000 plants (trees and shrubs) in Ludhiana city every year for creation of green buffers along road sides, centre verges and plantation of trees in vacant lands like parks, schools and community places in Ludhiana.

9. That Municipal Corporation Ludhiana has always been very diligent in taking steps towards creation of Green Belts for benefiting the residents of the city by providing better environment conditions.



verified that the affidavit has been read over & explained to the deponent who seemed perfectly understand at some at the time making thereof.

DEPONENT

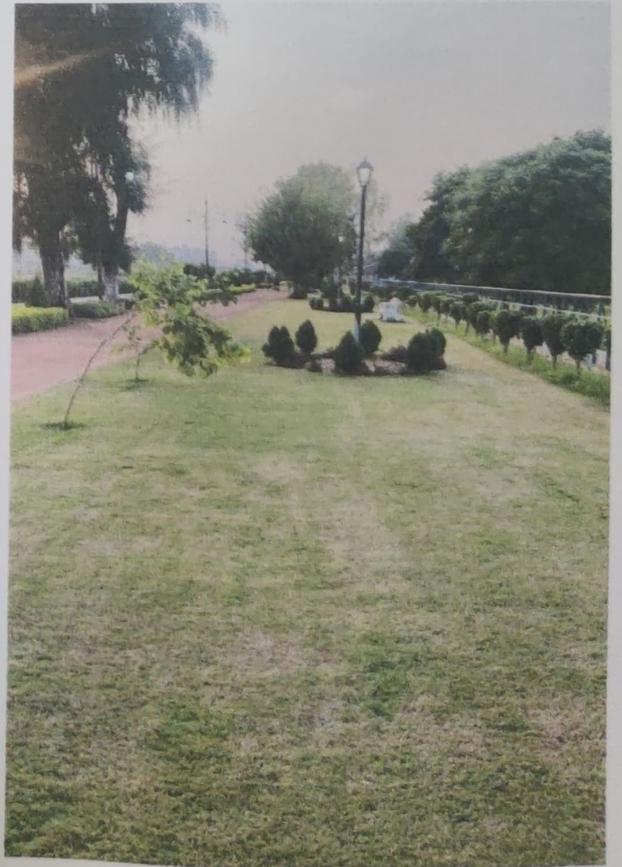
**VERIFICATION**

Verified at Ludhiana, of the 07 day of August, 2023 that the contents of the above reply in so far as they relate to factual position are true upon the information derived from the official record and in so far as they relate to the legal submissions are true upon the advice received and believed by me to be true. Rest is by way of submissions before this Hon'ble Tribunal.

has Signed before me  
I know him/her personally

ATTESTED AS IDENTIFIAL  
NOTARY PUBLIC LUDHIANA (PB)

DEPONENT

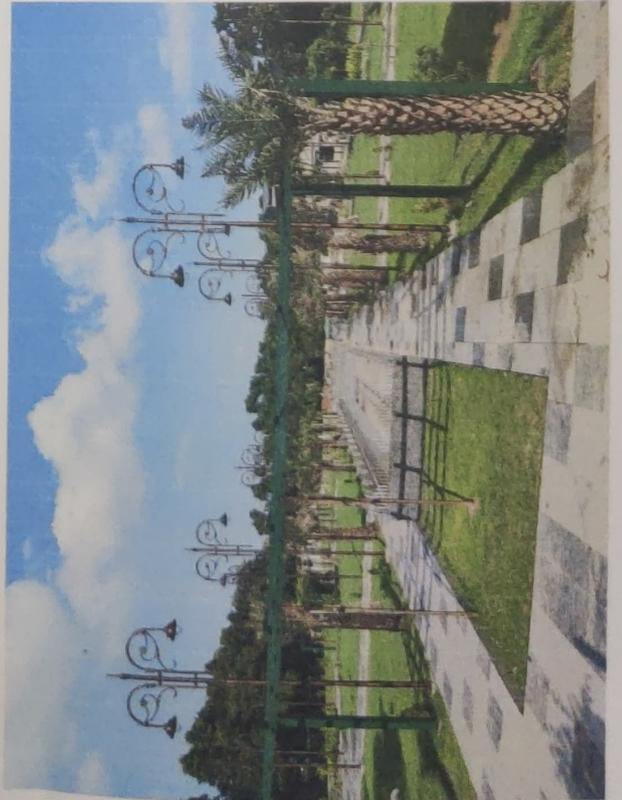
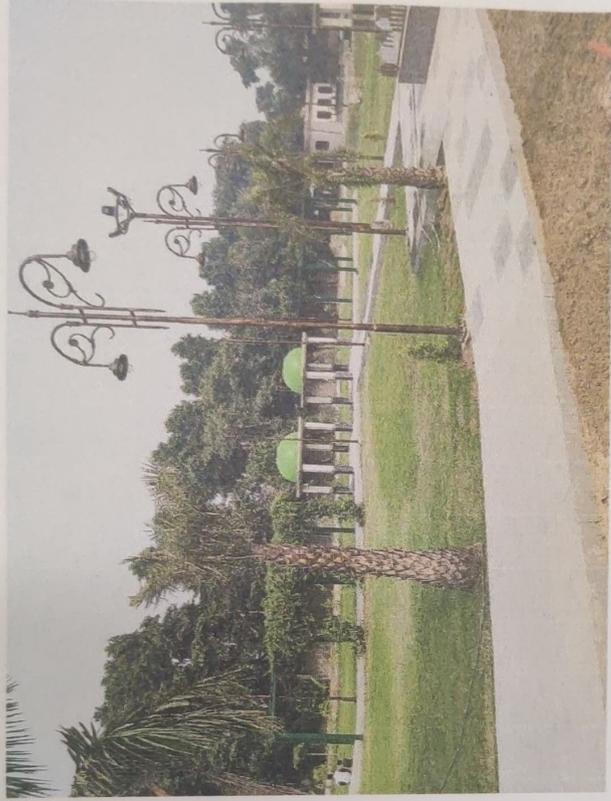




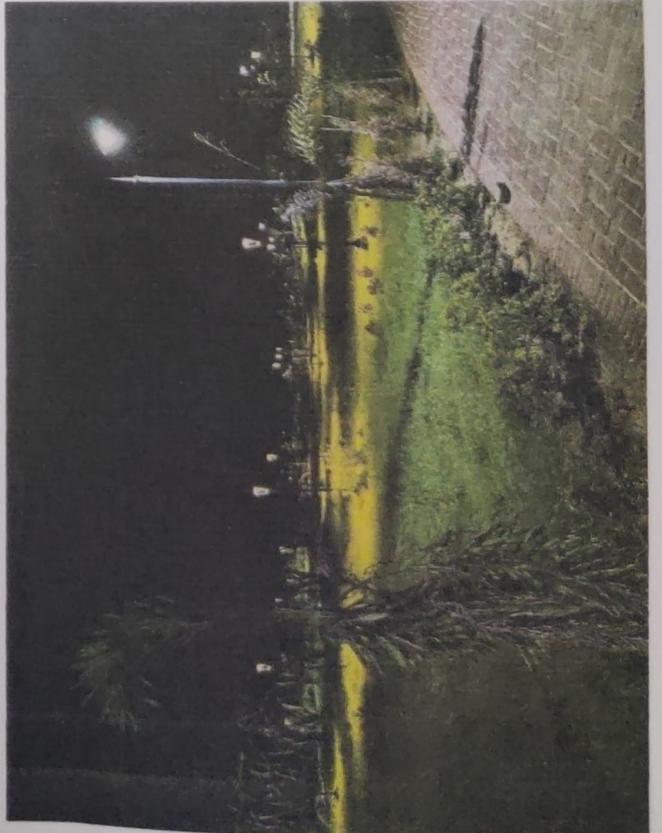
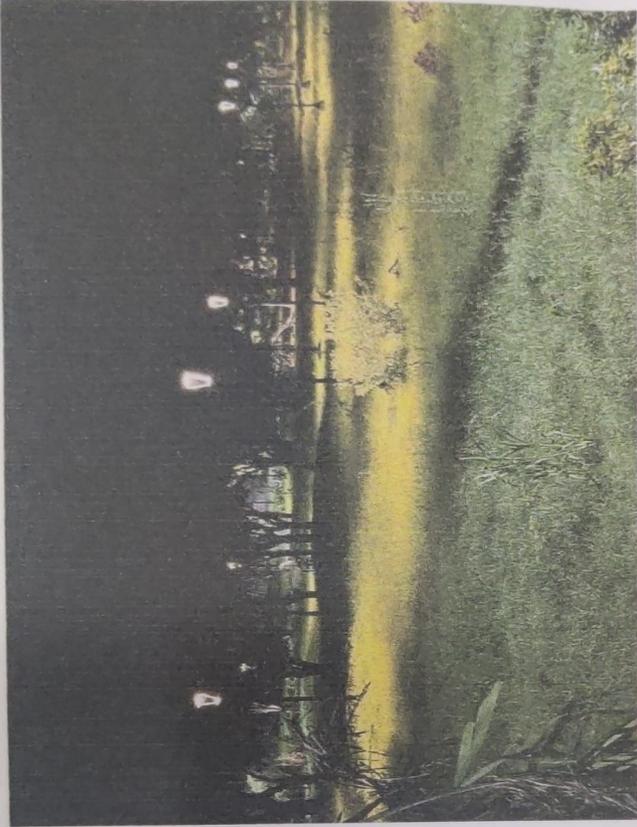
Along Sui road Bareilly



Mimosa rose garden



*Wesme valley*



L'esme valley



Green Belt along Sadhuwari Canal 33



