

**BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 363/2022**

**IN THE MATTER OF:**

VIKRANT TONGAD & ANR. .... APPLICANTS

VERSUS

STATE OF UTTAR PRADESH & ORS. .... RESPONDENTS

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राजय कुमार वाजपेई  
प्रबन्धक  
वर्क सर्किल-5

**RESPONDENT No. 3**

Through

Dated : 07.10.2022  
New Delhi

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**BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 363/2022**

**IN THE MATTER OF:**

VIKRANT TONGAD & ANR. .... APPLICANTS

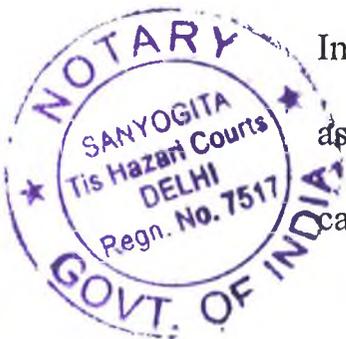
VERSUS

STATE OF UTTAR PRADESH & ORS. .... RESPONDENTS

**SHORT REPLY/COUNTER AFFIDAVIT FOR AND ON  
BEHALF OF RESPONDENT NO.4/ GREATER NEW  
OKHALA INDUSTRIAL DEVELOPMENT  
AUTHORITY(GNIDA).**

I, **Vijay Kumar Bajpai**, S/o **Sh. K. K. Bajpai** Aged about 45 years, working as Manager, having office at Work Circle-V, Plot No-1, Sector-K.P.-IV, Greater Noida, Gautam Buddha Nagar-201310, do hereby solemnly affirm and state as under:

1. That I am working as Manager in the Office of Greater Noida Industrial Development Authority (Hereinafter to be referred as '*Answering Respondent*') and as such in my official capacity I am well acquainted with the facts and circumstances



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of the present case and therefore competent to swear the instant Affidavit.

2. I have read the contents of the Original Application (In short to be referred as '*Application*') under reply and I say that the contents therein to the extent they are inconsistent with the submissions made hereinafter in this affidavit are incorrect and as such denied. Unless any averment or contention is specifically admitted or traversed, the same may be treated as denied. The Answering Respondent is filing present Short Counter Affidavit due to paucity of time and shall file a detailed Counter Affidavit as and when directed by this Hon'ble Court.

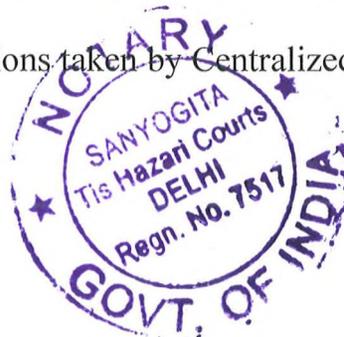
3. That the present Original Application has been filed by the Applicants making baseless allegations against the Respondents and more particularly against the Answering Respondent forso called vast-scale, reckless, excessive, and indiscriminate concretization of roadside and road berms in Greater Noida.



4. It is submitted that the allegations pertaining to concretization of roadsides/road shoulders are completely wrong, incorrect and misleading. It is humbly submitted that all roadside construction in GREATER NOIDA are being carried out by the Answering Respondent strictly in accordance with the directions passed by this Hon'ble Tribunal time to time and the Guidelines issued by the State Government as well as all other Authorities including Ministry of Environment, Forest and Climate Change, Govt. of India, and the Central Pollution Control Board.
5. That the instant Application is bereft of any merit and the same has been filed by the Applicants for gaining cheap publicity and as such the same may dismissed with exemplary cost by this Hon'ble Tribunal. It is humbly submitted that filing of such frivolous Application before this Hon'ble Tribunal not only consumes the precious judicial time of this Hon'ble Court but also hampers the development work being carried out by the Answering Authority for the good of public at large **and to control Air Pollution due to road dust**



6. That the Answering Respondent has always given the Environment and Ecology as top priority and as such has taken several steps and further continuously taking steps in line with directions passed by this Hon'ble Court for making GREATER NOIDA as more environment friendly and dust free area. It is submitted that laying down of interlocking tiles on Granular Sub Base which facilitates easy seepage of rain water into ground is nothing but a balance step taken by the Answering Respondent for making the city dust free while at the same time keeping the same environment friendly.
7. That the Applicants have wrongly averred in the Application that roadsides and road berms are being concretized, possibly for misleading this Hon'ble Tribunal by creating an impression that the act of Answering Respondent is not nature friendly. It is submitted that roadsides has not been concretized at all by the Answering Respondent and it has only laid down **interlocking** tiles on the granular sub base as permitted by this Ho'ble Tribunal in its direction passed time to time and in accordance with State Government Order dated 23.03.2018 and the decisions taken by Centralized Monitory Committee in



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its meeting held on 13.02.2020. Photographs taken by the Answering Respondent showing laying down of Interlocking tiles on Granular Sub Base/Coarse Sand is being annexed herewith and marked as ANNEXURE-R/1 (COLLY.).

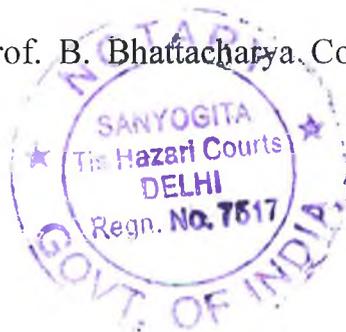
8. It is submitted that instant work of laying down of Interlocking tiles on Granular Sub Base/Coarse Sand on the roadside is being carried out by the Answering respondent pursuant to the decisions taken by the Central Monitoring Committee in its meeting held on 13.02.2020 for making the roads dust free and as such there is no illegality in laying down of Interlocking tiles on the roadside. It is pertinent to mention here that the said Central Monitoring Committee was constituted for prevention of air pollution in National Capital Territory vide order dated 10.11.2016 passed by this Hon'ble Tribunal in O.A. No.21/2014 titled as "*Vardhaman Kaushik Vs. Union of India*". A Copy of the Letter No.1537/.../152/2020, dated 17.02.2020 issued by the Uttar Pradesh State Pollution Control Board to the Chief Executive Officer, GREATER NOIDA thereby intimating the decision taken by the Central Monitoring



Committee in its meeting held on 13.02.2020, is being annexed herewith and marked as ANNEXURE-R/2.

9. That the Expert Committee constituted by Commission for Air Quality Management (CAQM) for suggesting permanent solution of air pollution menace in pursuance of Order dated 16.12.2021 passed by the Hon'ble Supreme Court in Writ Petition (Civil) No.1135/2020 titled as "Aditya Dubey Vs. Union of India & Ors.", has suggested for oriented action plans for greening/paving of central verges and side walks along the entire road network. It is submitted that laying down of the Interlocking tiles by the Answering Respondent along roadsides is in consonance with the said report and as such there is no illegality as is being alleged by the Applicants. A Copy of the Report of Expert Group dated 12.05.2022 on "Suggestions and Action Plans for permanent solution to air pollution in Delhi and NCR" is being annexed herewith and marked as ANNEXURE-R/3.

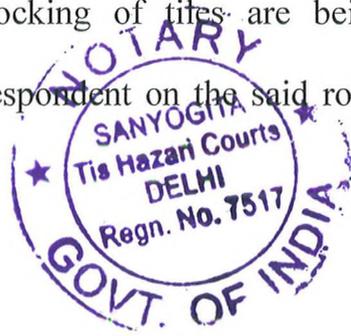
10. That the Policy Guidelines dated 23.03.2022 issued by the State of Uttar Pradesh in consonance with recommendations made by Prof. B. Bhattacharya Committee and accepted by



this Hon'ble Tribunal clearly provides that Interlocking tiles/Brick on Edge may be laid down on Granular Sub Base/WMM.

11. That one meter area around the tree has been left open fully complying the Order dated 23.04.2013 passed by this Hon'ble Tribunal in *Aditya N. Prasad Vs. Union of India, O.A. No.82/2013*. It is humbly submitted by the Answering Respondent that earth work has been done after inspection as per law in all places where the area around the tree was less than one meter. Photographs showing spaces left open around the tree are being annexed herewith and marked as ANNEXURE-R/4 (COLLY.).

12. That a typical road in GREATER NOIDA happens to be 18 meter wide consisting 7.0 meter carriageway, 2.00 meter road shoulder on both sides and 3.50 meter green area both sides including drainage & other services. It is submitted that road shoulders are in fact part of the carriageway left for extension of road in near future as per requirement. It is submitted that present interlocking of tiles are being laid down by the Answering Respondent on the said road shoulders which are



very much part of the carriageway. A Sketch of two 18 meter road in GREATER NOIDA showing carriageway, road shoulder and the green area are being annexed herewith and marked as ANNEXURE-R/5.

13. That the Answering Respondent has taken several steps **like developed 278 parks in 301.40 acre area, total green area of 5000 Hect. road side plantation of trees in 275 km length in developed area and planting 1 to 1.5 lacs trees/year. Every year for making the city green. Also the answering respondent has developed unique dust free zones by planting green grass in 275 km road side patri out of 286 km roads in Greater Noida, at appropriate places throughout GREATER NOIDA. Copies showing plantation of Green Grass in GREATER NOIDA is being annexed herewith and marked as ANNEXURE-R/6.(COLLY).**

14. It is humbly submitted by the Answering Respondent that although environment and ecology is important for human existence however development work is also equally important and as such any development work ought not to be hampered

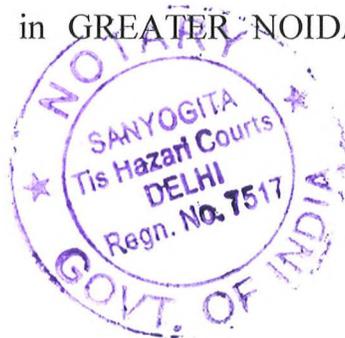


on trivial environment issues if the Answering Respondent has substantially complied with the Existing Environmental norms.

15. It is submitted by the Answering Respondent that this Hon'ble Tribunal ought not permit the person with vested interest to use the Environmental Law as toll for the ulterior purposes.

**PARA WISE REPLY**

16. That the averments made in the Synopsis and List of Dates are denied in to being wrong, incorrect and misleading.
17. That the Contents of Para I & II need no reply being formal in nature.
18. That the Contents of Para III are completely wrong, incorrect and misleading hence denied in to. It is denied that the present Application has raised any substantial question relating to environment. It is also denied that the vast scale, reckless, excessive and indiscriminate concretization of road side and road berms are being carried out by the Answering Respondent in GREATER NOIDA in violation of orders



passed by this Hon'ble Court in *Akash Vashishtha Vs. Union of India*, O.A. No.165/2013, *R.S. Virk Vs. Central Pollution Control Board*, O.A. No.283/2020 and the State Government Order issued in April, 2001. It is submitted that only interlocking tiles on Granular Sub Base/Coarse Sand has been placed on the roadside pursuant to and strictly in accordance with the Uttar Pradesh Government dated 23.03.2018 and the decision taken by the Centralized Monitory Committee, constitute vide Order dated 10.11.2016 passed by this Hon'ble Tribunal in O.A. No.21/2014 titled as "*Vardhaman Kaushik Vs. Union of India*" for prevention of Air Pollution in the National Capital Territory, in its meeting held on 13.02.2020. No concretization has been done on the roadside as is falsely alleged by the Applicants.

19. That the Contents of Para 1 & 2 are denied for want of knowledge however it is submitted that the Applicants be put to the strict proof of the same.
20. That the Contents of Para 3 need no reply being formal in nature.



21. That the Contents Para 4 are denied in to being wrong, incorrect and misleading. It is specifically denied that vast Scale, excessive and indiscriminate concretization of road side is being carried out by the Answering Respondent in GREATER NOIDA. It is submitted that only interlocking tiles on Granular Sub Base/Coarse Sand are being laid down strictly in line with the directions passed by this Hon'ble Tribunal and the State Government Order issued time to time in this regard.

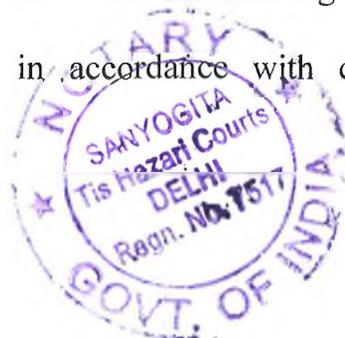
22. That in reply to the Contents of Para 5, 6 & 7 it is submitted that Applicants are intermixing concretization of road side with laying down of interlocking tiles on Granular Sub Base/Coarse Sand in order to confuse and mislead this Hon'ble Tribunal. It is humbly submitted that concretization is completely different from laying down of the interlocking tiles on Granular Sub Base/Coarse Sand. It is respectfully submitted that the Answering Respondent is only laying down interlocking tiles on Granular Sub Base/Coarse Sand as per site requirement and that too in accordance with the decision taken by the Central Monitoring Committee in its meeting held



on 13.02.2020. It is pertinent to mention here that interlocking tiles on granular sub base easily facilitates absorption of rain water in the earth. Rest of the contents are denied.

23. That in reply to the Contents of Para 8, 9, 10, 11, 12, 13, 14, 15 & 16 it is submitted that Policy Guidelines dated 23.03.2018 issued by the State Government in line with recommendations made by Prof. B. Bhattacharya Committee and accepted by this Hon'ble Tribunal vide Order dated 30.07.2018 passed in *Akash Vashishtha Vs. Union of India, Execution No.34/2016*, clearly provides that Interlocking Tiles/Brick on Edge may be laid down on Granular Sub Base/WMM on the roadside. As such, interlocking tiles on Granular Sub Base by the Answering Respondent in the present case is perfectly lawful and in line with the orders passed by this Hon'ble Tribunal. It is submitted that all orders passed by this Hon'ble Tribunal is being duly complied with by the Answering Respondent.

24. That in reply to the contents of Para 17, 18 & 19 it is submitted that the interlocking tiles are being placed completely in accordance with directions passed by this



Hon'ble Tribunal as well as government orders passed time to time as enumerated herein above. Rest of the contents are denied.

25. That in reply to the Contents of Para 20 & 21 it is submitted that all efforts have been made by the Answering Respondent to cover the open land with green area of 5000 Hect and, **about 286 km road side patri in 275 km road has been converted into dust free zone with Plantation** however where the covering of road shoulder with green grass is not possible due to heavy traffic, interlocking tiles have been laid down on Granular Sub Base so that rain water could easily percolate down in the earth. Furthermore laying of interlocking tiles is also in accordance with decision taken by the Centralized Monitory Committee in its meeting held on 13.02.2020. It is pertinent to mention here that Centralized Monitory Committee was constituted vide Order dated 10.11.2016 passed by this Hon'ble Tribunal in O.A. No.21/2014 titled as "*Vardhaman Kaushik Vs. Union of India*" for prevention of Air Pollution in the National Capital Territory. It is humbly submitted that Answering Respondent

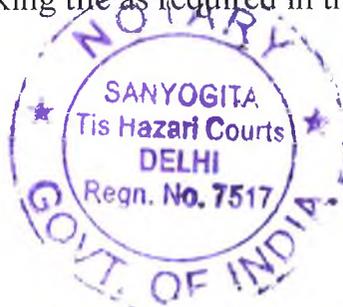


has complied all the orders passed by this Hon'ble Tribunal including the Order dated 03.12.2020 passed by this Hon'ble Tribunal in R. S. Virk Vs. Central Pollution Control Board, O.A. No.283/2020

26. That the contents of Para 22 & 23 are wrong, incorrect and misleading and as such complied denied by the Answering Respondent.

27. That in reply to the Contents of Para 25 & 26 it is submitted that no construction work has been done at least within one meter radius of trunk of trees and as such there is no question of violation of the order dated 23.04.2013 passed by this Hon'ble Court in *Aditya N. Prasad Vs. Union of India*, O.A. No.82/2013.

28. That in reply to the Contents of Para 27 it is submitted that Answering respondent have fully complied the "Guidelines for greening of urban areas and landscape" dated 21.07.2022 issued by the Ministry of Urban Development. It is submitted that Answering Respondent is using only porous tiles/interlocking tile as required in the said guideline.



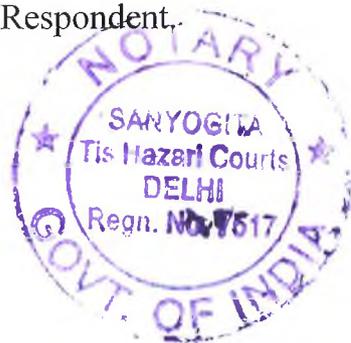
29. That in reply to Para 28, 29, 30, 31 and 32, Answering Respondent wishes to refer and rely on the submissions made herein above.

30. That in reply to the Contents of Para 33 and Para 34 it is submitted that the Answering Respondent is making all efforts for increasing Ground Water level **by constructing rain water harvesting recharge wells at appropriate places** while keeping pace with developmental work. Rest of the contents are denied.

31. That the Contents of Para 35 are matter of record and hence need no reply.

32. That the contents of Para 36, 37 & 38 are matter of record and thus need no reply.

33. That the contents Para 39 to 51 are concocted, wrong, incorrect, misconceived and misleading and hence denied by the Answering Respondent.



34. That the grounds of Application as enunciated in Para 52 is nothing but repetition of earlier paras and as such the same may be deemed to have replied in terms submissions made herein above.

35. That the prayers of the Application are also denied in view of submissions made herein above.

36. It is, therefore, most humbly and respectfully prayed that this Hon'ble Tribunal may be graciously pleased to dismiss the present Original Application filed by the Applicants with exemplary cost as the same is bereft of any merit.

37. I say that the contents hereof are true and correct to the best of my knowledge and belief and no part of it is false and nothing material has been concealed thereof.

विजय कुमार वाजपेई  
प्रबन्धक  
बर्क सर्किल-5

DEPONENT

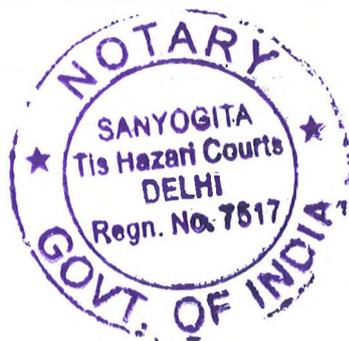
**VERIFICATION**

Verified at *New Delhi* on this *7<sup>th</sup>* day of *Oct*, 2022 that the contents of the above affidavit are true and correct to the best of knowledge and belief and nothing material has been concealed therefrom.

विजय कुमार वाजपेई  
प्रबन्धक  
बर्क सर्किल-5

DEPONENT

*Nishi Kant Singh*  
*D/1396/2016*



**ATTESTED**

NOTARY PUBLIC  
DELHI (INDIA)

- 7 OCT 2022

BEFORE THE NATIONAL GREEN TRIBUNAL PRINCIPAL  
BENCH, NEW DELHI

I.A. No.115/2022

In

ORIGINAL APPLICATION NO.363/2022

**IN THE MATTER OF:-**

VIKRANT TONGAD & ANR.

.....APPLICANTS

VERSUS

STATE OF UTTAR PRADESH & ORS. ....RESPONDENTS

**REPLY FOR AND ON BEHALF OF THE RESPONDENT NO. 4  
NOIDA AUTHORITY TO THE STAY APPLICATION FILED BY  
THE APPLICANT**

**MOST RESPECTFULLY SHOWETH:**

1. That the respondent No. 4 Greater Noida Industrial Development Authority (Hereinafter called as “Answering Respondent”) have filed Reply/Counter Affidavit in the above captioned matter and as such the submissions made therein may be construed as part and parcel of the present Reply and the same are not being repeated herein for the sake of brevity.
2. That the averments made in the Application under reply in nothing but mere reproductions of the submissions made in the Original Application being O/A. No.363/2022 and as such the same may be deemed to have replied in terms of submissions made in Reply/Counter Affidavit filed by the by the Answering Respondent.
3. It is submitted that the allegations pertaining to concretization of roadsides/road shoulders are completely wrong, incorrect and misleading. It is humbly submitted that all roadside construction in NOIDA are being carried out by the Answering Respondent strictly in accordance with the directions passed by this Hon'ble Tribunal time to

time and the Guidelines issued by the State Government as well as all other Authorities including Ministry of Environment, Forest and Climate Change, Govt. of India, and the Central Pollution Control Board.

4. That the Applicants have wrongly averred in the Application that roadsides and road berms are being concretized, possibly for misleading this Hon'ble Tribunal by creating an impression that the act of Answering Respondent is not nature friendly. It is submitted that roadsides has not been concretized at all by the Answering Respondent and it has only laid down interlocking tiles on the granular sub base as permitted by this Ho'ble Tribunal in its direction passed time to time and in accordance with State Government Order dated 23.03.2018 and the decisions taken by Centralized Monitory Committee in its meeting held on 13.02.2020.
5. That the instant Petition/Application is bereft of any merit and the same has been filed by the Applicants for gaining cheap publicity. It is humbly submitted that filing of such frivolous Application and getting stay by misleading this Hon'ble Tribunal not only consumes the precious judicial time of this Hon'ble Tribunal but also hampers the development work being carried out by the Answering Authority for the good of public at large and to control Air Pollution due to road dust.

#### PRAYER

It is, therefore, most humbly and respectfully prayed that this Hon'ble Tribunal may be graciously pleased to:

- i. Dismiss the present Stay Application filed by the Applicants with exemplary cost as the same is bereft of any merit;

- ii. Vacate the interim Stay Order dated 24.05.2022 passed by this Hon'ble Tribunal in the above captioned matter; And pass any other order or such further orders as this Hon'ble Court may deem fit and proper in the facts and circumstances for which act of kindness the Respondent as in duty bound shall ever pray.

विजय कुमार याजपेई  
प्रबन्धक  
बर्क सर्किल-5

RESPONDENT No. 4

Through

Dated : 07.10.2022  
New Delhi

*Nishi Kant Singh*  
Abdhesh Chaudhary, Adv.  
Chaudhary Law Offices  
Advocates  
K-2017, LGF, Chittaranjan Park,  
New Delhi-110019.  
Ph. No. : 011-41053797  
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correct to the best of knowledge and belief and the same is based on official record maintained by the Answering Respondent. That the most respectfully states that the contents of this instant affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed thereof.

विजय कुमार वाजपेई  
प्रबन्धक

**DEPONENT**

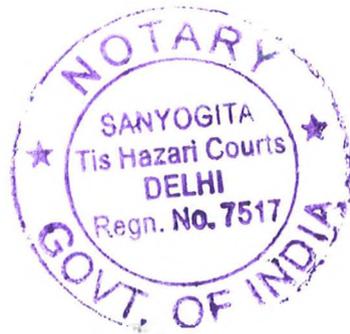
**VERIFICATION**

Verified at New Delhi on this the <sup>7th</sup>..... day of October, 2022 that the contents of the above affidavit are true and correct to the best of my knowledge and belief nothing materials have concealed therefrom.

विजय कुमार वाजपेई  
प्रबन्धक

**DEPONENT**

Nishi Kant Singh  
D/396/2016



**ATTESTED**

**NOTARY PUBLIC  
DELHI (INDIA)**

**- 7 OCT 2022**



MG Rd, Block A, Ansal Golf Links 1, Greater Noida, Uttar Pradesh 201310, India

Latitude 28.450859999999995° Longitude 77.51009666666667°

Local 11:13:01 AM Altitude 150.7 meters  
GMT 05:43:01 AM Sunday, 27-03-2022

T.C  
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Parswanath Edens, Block D, Alpha I, Greater Noida, Uttar Pradesh, India

Greater Noida  
Uttar Pradesh  
India

33°C  
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2022-02-06(Sat) 04:26(PM)

T.C  
A

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ANNEXURE-R/2

R-06  
 20/02/2020  
 उत्तर प्रदेश प्रदूषण नियंत्रण बोर्ड, नोएडा  
 ई-12/1, गेट-1 नोएडा, मोहनपुरा नगर  
 ई-मेल : ronoide@uppcb.com, फोन : 0120-4974652

पत्र संख्या 1537/रा.प्र.वि. -1537/2020  
 दिनांक 11/03/20

विषय-भारत सरकार के सचिव, पर्यावरण वन एवं जलवायु परिवर्तन में दिये गये निर्देशों के सम्बन्ध में।

अवगत कराना है कि वन, पर्यावरण एवं जल वायु परिवर्तन मंत्रालय के जोरदार दिवसीय शिवालय में दिनांक 13.02.2020 को बैठक की गयी। बैठक अपशिष्ट निस्तारण कन्ट्रोलेशन एण्ड डिमॉलेशन निस्तारण, प्लास्टिक कचरा कलेक्शन एवं व्यवस्था निस्तारण, पाबिग सुविधा, रोड डस्ट, अमपेड रोड, मैकेनिकल रीपिंग एवं वाटर रिपैरिंग के कार्यों की समीक्षा की गयी एवं आवश्यक दिशा निर्देश जारी किये गये। आवश्यक विन्दु निम्नवत् है-

- समस्त स्थानीय निकाय द्वारा दोस अपशिष्ट प्रबंधन नियम 2016 के अनुसार कलेक्शन, रीपिंगेशन निस्तारण की पूर्ण व्यवस्था सुनिश्चित की जाये।
- समस्त स्थानीय निकाय द्वारा कन्ट्रोलेशन एण्ड डिमॉलेशन प्रबंधन नियम 2016 के अनुसार कलेक्शन, रीपिंगेशन, उपचार एवं निस्तारण की पूर्ण व्यवस्था सुनिश्चित की जाये।
- समस्त स्थानीय निकाय द्वारा प्लास्टिक वेस्ट मैनेजमेंट नियम 2016 के अनुसार कलेक्शन, रीपिंगेशन, उपचार एवं निस्तारण की पूर्ण व्यवस्था सुनिश्चित की जाये।
- समस्त स्थानीय निकायों में सभी सड़कों पर मैकेनिकल रीपिंग की जाये तथा मैकेनिकल रीपिंग मशीनों पर ऑपरेटरों द्वारा डिमॉलेशन लगाने की व्यवस्था सुनिश्चित की जाये उचित कार्य का रूट चार्ट स्थानीय वेब साईट पर प्रदर्शित की जाये।
- समस्त स्थानीय निकायों में धूल जमित होने वाले क्षेत्रों में वाटर स्पिकलिंग की जाये तथा वाटर स्पिकलिंग मशीनों पर ऑपरेटरों द्वारा डिमॉलेशन लगाने की व्यवस्था सुनिश्चित की जाये उचित कार्य का रूट चार्ट स्थानीय वेब साईट पर प्रदर्शित की जाये।
- समस्त स्थानीय निकायों में किसी भी स्थल पर यदि कन्ट्रोलेशन एवं डिमॉलेशन, दोस अपशिष्ट प्लास्टिक वेस्ट आदि प्रदूषित है उचित हासिल नियमानुसार निस्तारण सुनिश्चित किया जाये।

सचिव महोदय द्वारा उचित विन्दुओं पर अनुपलब्ध आख्या वाली गयी है तथा प्रत्येक मास उक्त मशीनों के पर्याप्त है।

अतः आपसे अनुरोध है कि एक सप्ताह के अन्दर अनुपालन आख्या प्रेषित करने हेतु सम्बन्धित को निर्देशित करने को कृप्य करें।

53558/12/10) Director (Water) SPE/UM/...

मुकुंश कुमार वैश्य  
 वरिष्ठ प्रबंधक  
 पूर्व सचिव-6, नोएडा

(अ) अमित कुमार मिश्रा  
 क्षेत्रीय अधिकारी

प्रतिनिधि- निम्नलिखित को सूचनाओं एवं जानकारी हेतु प्रेषित।

- विभागाध्यक्ष, मोहनपुरा नगर।
- मुख्य पर्यावरण अधिकारी, गेट-1, उद्योग प्रदूषण नियंत्रण बोर्ड, मोहनपुरा नगर।

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 17/03/2020

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REGIONAL OFFICE  
UTTAR PRADESH STATE POLLUTION CONTROL BOARD, NOIDA  
E-12/1, Sector-1, Noida, Gautam Buddha Nagar  
E Mail: [ronoida@uppcb.com](mailto:ronoida@uppcb.com), Phone: 0120, 4974552

Ref. No.1537/Gov. Letter.-152/2020

Dated: 17.02.2020

To

1. Chief Executive Officer, New Okhla Industrial Development Authority, Sector-6, Noida
2. Chief Executive Officer, Greater Noida Industrial Development Authority, Greater Noida
3. Chief Executive Officer, Yamuna Express Way, Industrial Development Authority, Greater Noida
4. Executive Officer- Municipal Council, Dadri, Nagar Panchayat Bilaspur/Dankaur/Jahangirpur/Jewar/Rabupura

**Subject:** Regarding directions issued by the Secretary, Ministry of Environment, Forest and Climate Change, Government of India.

Sir

This to inform you that a meeting was held on 15.02.2020 in the office of Ministry of Environment, Forest & Climate Change, Jorbag, Delhi. Works related to waste material disposal, construction and demolition

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disposal, plastic waste collection and its disposal, parking facility, road dust, unpaved road, mechanical sweeping and water sprinkling was reviewed and necessary directions were issued in the meeting.

Necessary points are as follow-

1. Complete management of collection, segregation and disposal in accordance with Solid Waste Management Rules, 2016 be insured by all the local bodies.
2. Complete management of collection, segregation, treatment and disposal in accordance with Construction and Demolition Management Rules 2016 be insured by all the local bodies.
3. Complete management of collection, segregation, treatment and disposal in accordance with Plastic Waste Management Rules, 2016 be insured by all the local bodies.
4. Mechanical sweeping be done in all the local bodies and placing of GPS Device on all the mechanical sweeping machines be insured so that rout chart of said work could be displayed on the website of local bodies.
5. Water sprinkling be done in dust affected areas of all the local bodies and placing GPS Device on all the water sprinkling

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machines be insured so that rout chart of said work could be displayed on the website of local bodies.

6. Roads be made dust free and pavements either be made green pavement or interlocking be done on it.
7. If construction and demolition waste, solid waste plastic waste etc. are stored at any place within the local body area then disposal of the same as per law be insured.

Compliance Report on aforesaid points has been asked by the Secretary and in every month review meeting is proposed.

Hence it requested to you that concerned officer be directed for submitting compliance report within a week.

Sincerely

Sd/-

(Dr. Anil Kumar Singh)

Regional Officer

Copy issued to the following for information and necessary action:

1. District Magistrate, Gautam Buddha Nagar
2. Chief Environment Officer, Uttar Pradesh Pollution Control Board, Lucknow.

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ANNEXURE-R/S

Report of the Expert Group on "Suggestions and Action Plans for permanent solution to air pollution in Delhi and NCR"

12<sup>th</sup> May, 2022

1. The mandate

The Hon'ble Supreme Court of India in its order dated 16.12.2021 (Civil) No 1135 in the matter of Aditya Dubey (minor) and Anr vs UOI & Ors directed the Commission for Air Quality Management (CAQM) that with a view to "find permanent solution to the air pollution menace occurring every year in Delhi and NCR, suggestions may be invited from the general public as well as the experts in the field."

The Commission through advertisements published on 24.12.2021 in three leading national dailies each in Hindi and English and also by uploading the same on the website of the Commission, invited suggestions within 14 days of publication to this effect. As per the order of the Hon'ble Supreme Court, suggestions received were to be examined by an Expert Group to be constituted by the Commission for the said purpose before finalization of the policy to curb air pollution.

Accordingly, the Commission for Air Quality Management (CAQM), vide order dated 7.1.2022, constituted an Expert Group with the following terms of reference:

- i) To consider the suggestions received from the general public and experts in the field with a view to finding out permanent solution for the air pollution menace occurring every year in Delhi and NCR.
- ii) To recommend suggestions for formulating permanent solutions for the air pollution menace.
- iii) To suggest a policy to curb air pollution before finalization.

Expert Group was also advised to interact with interveners, experts, and others as Expert Group feels necessary and submit the report within 2 months of constitution.

The approach followed by the Expert Group to formulate suggestive policy to curb air pollution in region is summarized below

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Dust and pollution mitigation through forest sinks is important to control pollution. This green walling is needed against desertification and ingress of dust and cleansing of toxic gases. High level protection will have to be accorded to the entire stretch of Aravalli range in Haryana and Delhi and its different categories of forest areas.

At the national level, the National Mission for a green India has been revised in line with the Nationally Determined Commitment (NDC) target. Afforestation of over 24 million hectares is targeted in convergence with ongoing central and state government schemes and funds available under CAMPA.<sup>20</sup> Currently, a central level MIS for tracking scheme-wise and state-wise outcomes is being developed. This can be further refined for the entire NCR region. Also, the Nagar Van scheme is an opportunity for greening in the NCR sub-regions. Under central government funding, urban local bodies and others can help to establish Nagar vans in 10-50 hectares of land and vaticas in 1-10 ha land.

Several sub-regions have begun to implement this scheme. While Haryana has a clear plan, Ghaziabad has implemented two afforestation projects taken up – Miyawaki forest that include Sai Upvan in area of 96 x 16 sqm, with 5000 trees planted in total (more than 25 species) and 6000 sqm area in Pratap Vihar with 20,000 trees planted in total (approximately 40 species). Such efforts need to continue to augment the per-capita green cover in cities.<sup>21</sup>

Greening and plantations: targeted action plan and timelines.

Policy interventions	Sub-region	Responsible authorities	Timeline as per plan period
Expanding the net of "Nagar Van" and Nagar Vatika, wherever feasible, in urban agglomerations and cities in NCR, including adoption of MIYAWAKI technique for dense	Delhi and all NCR districts	Forest Deptt. And Urban Affairs Deptt. NCR State Govts	As per plan to be developed

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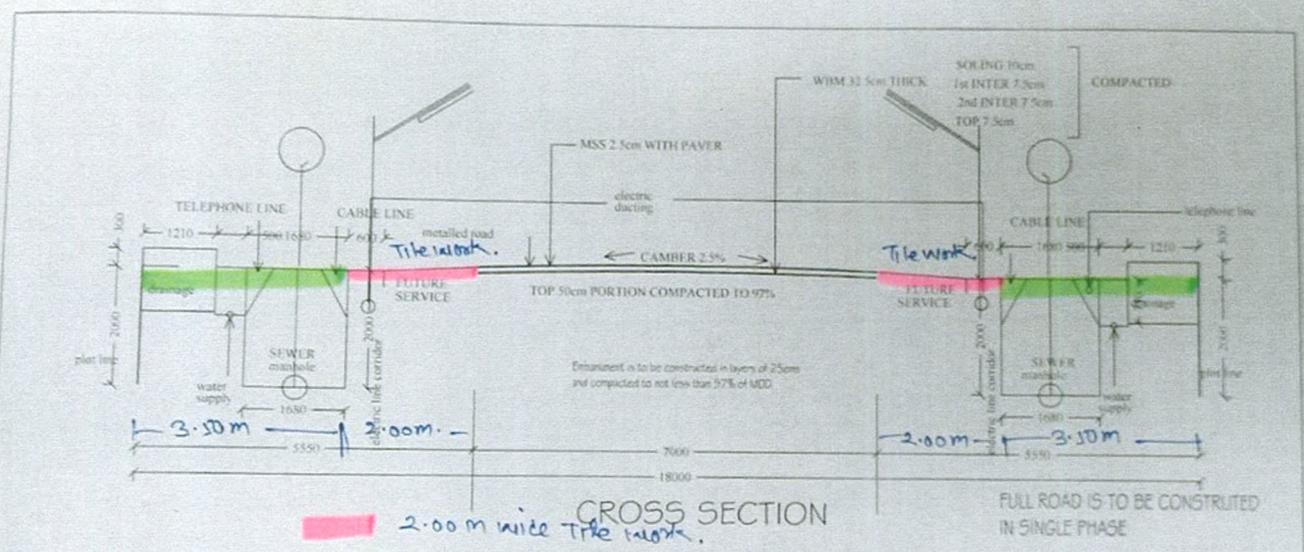


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**Greater Noida, Uttar Pradesh, India**  
 FG26+GCQ, Sector Omega 1, Block A, Ansal Golf Links 1,  
 Greater Noida, Uttar Pradesh 201310, India  
 Lat 28.451231°  
 Long 77.511535°  
 07/10/22 11:23 AM

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**CROSS SECTION**  
 2.00 m wide Tile work.  
 3.50 m wide Green Area.

NOTE  
 1st PHASE - TOTAL 32.5cm THICK CRUST THICKNESS WITH 4COATS OF WBM AND 2.5cm THICK MSS WITH PAVER IN METALLED WIDTH 7.00M.

STRENGTHENING (IF REQUIRED) AFTER 5 YEARS WITH BM 5.0cm AND 2.5cm THICK SDC  
 OR  
 RESURFACING WITH 2.5cm THICK MSS WITH PAVER.

NOTE  
 (1) IF THE M.T.J.L.T. LINE IS TO BE TAKEN ACROSS THE ROAD, THE PIPES FOR SAME SHALL BE LAID BELOW THE ROAD FOR WHICH THE SPACING / DIAMETRE OF PIPE SHALL BE INTIMATED BY S.M.(ELECT.)

18.00M WIDE ROAD CROSS SECTION	
	DATE MARCH 2000
SR. MRG (PLNG)	G.M.(PLNG & ARCH)
GREATER NOIDA INDUSTRIAL DEVELOPMENT AUTHORITY	

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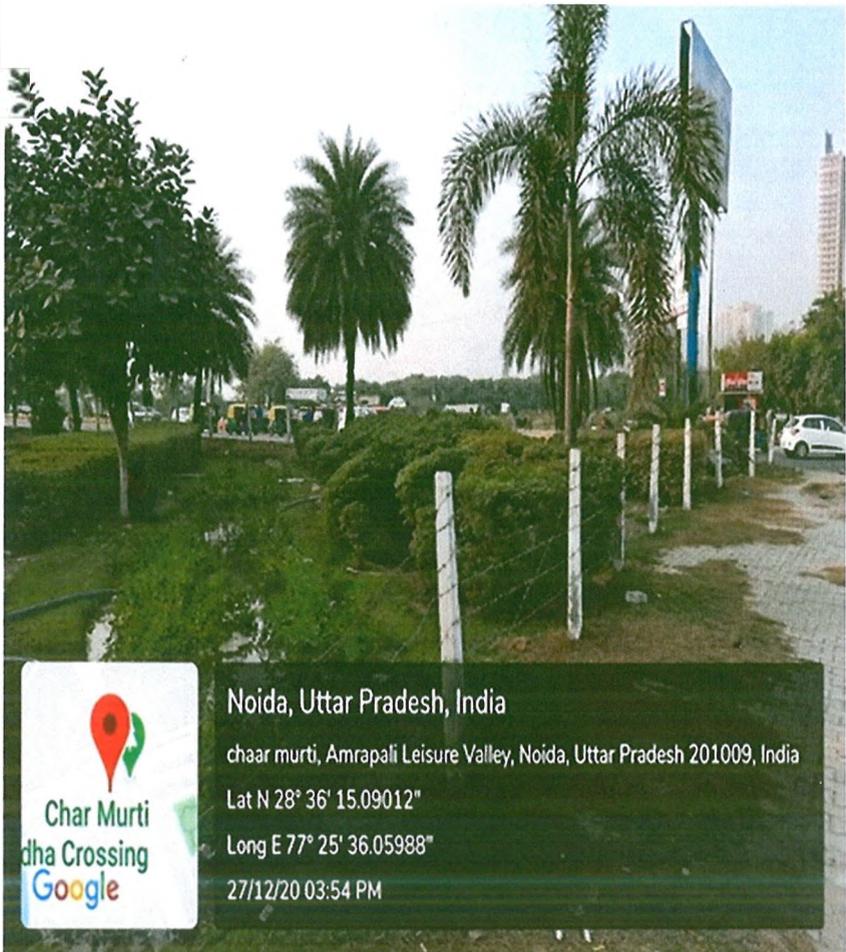
ANNEXURE-R16 (Loty) 34



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IN THE Hon'ble National Green Tribunal, Principal Bench, New Delhi

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In the matter of:

O.A. No. 363/2022

Vikrant Tongad & Anr.

Plaintiff(s)/ Petitioner(s)/ ... Appellant(s)/ Applicant(s)

VERSUS

State of Uttar Pradesh & Ors.

... Defendant(s)/ Respondent(s)

KNOW ALL to whom these presents shall come that I/WE the above named----- RESPONDENT No. 4 - GNIDA ----- do hereby appoint

VIJAY KUMAR BAIJAI - AR OF R 4 (GNIDA)

Mr. ABDHESH CHAUDHARY (D/2498A/1999)
Ms. MANISHA SURI (D/412-H/2000)
Mr. NILENDU VATSYAYAN (D/2561/2005)
Mr. NISHIKANT SINGH (D/396/2016)
Ms. GEETANJALI SETIA (D/3817/2020)



ADVOCATE(S) for

CHAUDHARY LAW OFFICES

Office at : K-2017, (L.G.F), CHITTARANJAN PARK, NEW DELHI - 110019; Ph. No. 011-41053797, (M) 9810075174
Email: chaudharylawoffices@gmail.com

Hereinafter called the Advocate(s) to be my/our Advocate(s) in the above noted case & him/them:-

- (1) To act, appear and plead in the above noted case in this Court, or any other Court to which th transferred, or the Court where the same may be tried or heard and also in the appellate Courts.
(2) To accept notice/process of Court on my behalf.
(3) To sign, file and present all pleadings, replications, rejoinders, appeals, cross-objections, pet affidavits, objections, affidavits, applications, including applications for execution, restorative and compromise, or such other petitions or affidavits or other documents as may be deemed proper for the prosecution of the said case in all its stages.
(4) To file and take back documents.
(5) To withdraw or compromise the said case.
(6) To take out execution proceedings.
(7) To deposit, withdraw and receive moneys, cheques and other instruments and grant receipts there
(8) To do all other acts and things as may be deemed necessary or required to be done in the course of the said case.
(9) To appoint and instruct another advocate(s) and authorize him/her/them to exercise the powers and authority hereby conferred whenever the Advocate(s) may think fit to do so and to sign a power of attorney on my/our behalf for the said purpose.

And I/We do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and purposes.

And I/We the undersigned do hereby agree not to hold the Advocate(s) or his substitute responsible for the result of the said case.

And I/We the undersigned do hereby agree that in the event of the whole or any part of the fee agreed by me/us to be paid to the Advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these presents this the 7th day of Oct., 2022.

Accepted subject to terms of fee.

Signature of Abhesh Chaudhary

(ABDHESH CHAUDHARY)

Signature of Manisha Suri

(MANISHA SURI)
E. No. D/412-H/2000
Mob.: 9810075174

Signature of Nishikant Singh

(NISHIKANT SINGH) (NILENDU VATSYAYAN) (GEETANJALI SETIA)

Signature of Vijay Kumar Bajpai

Signature of Client
Plaintiff(s)/ Petitioner(s)/ Appellant(s)
Applicant(s)/ Defendant(s)/ Respondent(s)

Identified
Geetanjali Setia
D/3817/2022



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## ग्रेटर नौएडा औद्योगिक विकास प्राधिकरण

(उ० प्र० सरकार का उपक्रम)

प्लॉट सं० - 01, नालेज पार्क-4, ग्रेटर नौएडा सिटी - 201310

जिला - गौतमबुद्ध नगर, उत्तर प्रदेश

दूरभाष - 0120-23360130, फ़ैक्स-0120-23360131



कोड संख्या : 837  
नाम : विजय कुमार वाजपेयी  
पदनाम : प्रबंधक  
पता : H-56A, सेक्टर-22,  
नौएडा



मान्य अवधि: 31.12.2022

धारक के हस्ताक्षर

जारी करने वाले अधिकारी के हस्ताक्षर



CHAUDHARY LAW OFFICES <chaudharylwoffices@gmail.com>

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**Advance Service of Short reply/Counter Affidavit on behalf of Respondent no. 4/ Greater Noida Industrial Development Authority**

---

CHAUDHARY LAW OFFICES <chaudharylwoffices@gmail.com>  
To: vashistha.akash6@gmail.com

Fri, Oct 7, 2022 at 4:16 PM

In re: O.A. no. 363 of 2022 titled as Vikrant Tongad Anr. vs. State of UP & Ors.

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Dear Sir,

Enclosed please find attached the short reply/counter affidavit for and on behalf of the respondent no. 4/Greater Noida Industrial Development Authority in the aforesaid matter.

Kindly acknowledge the same.

Regards  
Geetanjali Setia  
Advocate

---  
for Chaudhary Law Offices  
Advocates  
K-2017,(LGF)  
Chittaranjan Park  
New Delhi-110 019.  
+91-11-41053797

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 **Vikrant Tongad - Short reply - GNIDA.pdf**  
17111K