

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

**E.A No. 44 of 2024
IN
O. A. No. 143 of 2023**

IN THE MATTER OF:

SUNIL VAID & ANR ...APPLICANTS

Versus

STATE OF U.P & ORSRESPONDENTS

**SUBMISSIONS ON BEHALF OF THE APPLICANTS
WITH AFFIDAVIT**

(FOR INDEX: - Kindly See Inside)

**New Delhi
Dated.....04.2025**


S.A ZAIDI & MANSI CHAHAL
ADVOCATES
CHAMBER NO- 7, TRISHUL TOWER
KAUSHAMBHI, GHAZIABAD U.P
(M):8377863559
EMAIL: mansichahal104@gmail.com

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

**E.A No. 44 of 2024
IN
O. A. No. 143 of 2023**

IN THE MATTER OF:

SUNIL VAID & ANR ...APPLICANTS

Versus

STATE OF U.P & ORSRESPONDENTS

INDEX

<u>S. No.</u>	<u>Particulars</u>	<u>Pages</u>
1.	Submission on behalf of the Applicants with Affidavit	1 - 10
<u>2.</u>	Photographs of the Ambedkar Park, Podium Park, Krishna Park & Chitragupt Park taken on 17.04.2025 showing current status of the parks is annexed as ANNEXURE A/1 (Colly).	11 - 38

New Delhi

Dated.....04.2025

Mansi

S.A ZAIDI & MANSI CHAHAL
ADVOCATES
CHAMBER NO- 7, TRISHUL TOWER
KAUSHAMBHI, GHAZIABAD U.P
(M):8377863559
EMAIL: mansichahal104@gmail.com

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

**E.A No. 44 of 2024
IN
O. A. No. 143 of 2023**

IN THE MATTER OF:

SUNIL VAID & ANR ...APPLICANTS

Versus

STATE OF U.P & ORSRESPONDENTS

**SUBMISSIONS ON BEHALF OF THE APPLICANT
WITH AFFIDAVIT**

MOST RESPECTFULLY SHOWETH:

The Applicant respectfully submits the following points in regard to the parks in questions in the present matter i.e. Krishna Park, Podium Park, Chitragupta Park and Ambedkar Park situated in Vaishali, Ghaziabad:-

- 1.** At the outset, the Applicants acknowledge the improvements and efforts made to improve the conditions of the parks by the Municipal Corporation. However, it is respectfully

submitted that despite some progress, the parks still lacks regular maintenance which demands urgent and consistent attention.

2. Lack of Regular Maintenance: Numerous dry trees and plants are still lying unattended within the parks, creating not only an unsightly appearance but also posing a potential fire hazard and affecting the ecological balance of the green spaces.

3. Improper Solid Waste Management: The parks are littered with solid waste, primarily due to the activities of street vendors who place their food carts along the boundaries of the parks. The waste generated from these vendors is often not collected or disposed of properly, leading to an unhygienic environment.

4. Absence of Daily Cleaning: It is observed that cleaning operations are not being carried out on a daily basis. The accumulation of

garbage, dried leaves, and plastic waste is detrimental to public health and prevents citizens from using the parks for recreational or fitness purposes.

5. Environmental Significance: Public parks serve as the lungs of the city, playing a critical role in maintaining ecological balance, improving air quality, and offering urban dwellers a necessary escape into nature. Their regular upkeep is not only a matter of aesthetics or convenience but is also vital for public health and environmental preservation.

6. Obligations under Central Guidelines: The Ministry of Housing and Urban Affairs and the Ministry of Environment, Forest and Climate Change have issued several guidelines for the development, maintenance, and sustainable use of public parks. These include regular cleaning, pruning of trees, waste segregation, provision of dustbins, public participation in

upkeep, and banning encroachments and unauthorized activities. The current state of the parks indicates a lack of adherence to such guidelines. **Photographs of the Ambedkar Park, Podium Park, Krishna Park & Chitragupt Park taken on 17.04.2025 showing current status of the parks is annexed as ANNEXURE A/1 (Colly).**

SUGGESTIONS BY THE APPLICANT

In light of the above, the Applicant respectfully submits the following suggestions for the kind consideration of this Hon'ble Tribunal:

- a.** The Ghaziabad Municipal Corporation should be directed to ensure daily cleaning and maintenance of the parks, including proper disposal of solid waste.
- b.** Complete removal of dead or dry trees and plants should be undertaken immediately, and new saplings should be planted in their place.

c. Street vendors should not be permitted to encroach upon the periphery or boundary of the parks, and necessary zoning and enforcement measures must be implemented.

d. The Ghaziabad Municipal Corporation may be directed to submit a detailed action plan along with a timeline for regular park maintenance, including monthly audits and public grievance redressal mechanisms.

f. The Ghaziabad Municipal Corporation should also promote citizen involvement through RWAs and civil society for better upkeep and vigilance of the parks.

g. CCTV surveillance, proper signage, and deployment of ground-level sanitation staff should be ensured to prevent misuse and encourage responsible usage.

PRAYER

In view of the above submissions, the Applicant humbly prays that this Hon'ble Tribunal may be pleased to:

- 1) Take note of the ongoing lapses in the maintenance of the parks.
- 2) Direct the Ghaziabad Municipal Corporation to take sustained steps to ensure proper maintenance and environmental integrity of the parks;
- 3) Pass such further orders or directions as may be deemed just and proper in the interest of environmental protection and public welfare.

New Delhi
Dated.....04.2025

Applicants

Through



**S.A. ZAIDI & MANSI CHAHAL
ADVOCATES**

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

**E.A. No. 44 OF 2025
IN
O.A. No. 143 OF 2023**

IN THE MATTER OF:

SUNIL VAID & ANR.

...APPLICANTS

VERSUS

STATE OF U.P. & ORS.

..RESPONDENTS

AFFIDAVIT

I Sunil Vaid S/o Late Shri. O.P. Vaid R/o 2B/65, Sadhna, Vaishali, Ghaziabad, Uttar Pradesh, presently at New Delhi do here by solemnly affirm and declare as under:

1. That I am the Applicant No. 1 in the above noted case therefore I am fully conversant with the fact of the case I am competent to sign and swear this Affidavit.
2. That the accompanying Objections has been drafted by my counsel and the same has been read over and explain to me and I say and declare that the same are true and correct.



3. That the Contents of accompanying Objections be read as part and parcel of this affidavit as the same are not repeated herewith for the sake of brevity.


DEPONENT

VERIFICATION

Verified at Delhi on this day of , 2025 that the contents of my above Affidavit are true and correct to my knowledge and nothing material has been concealed there from.


DEPONENT

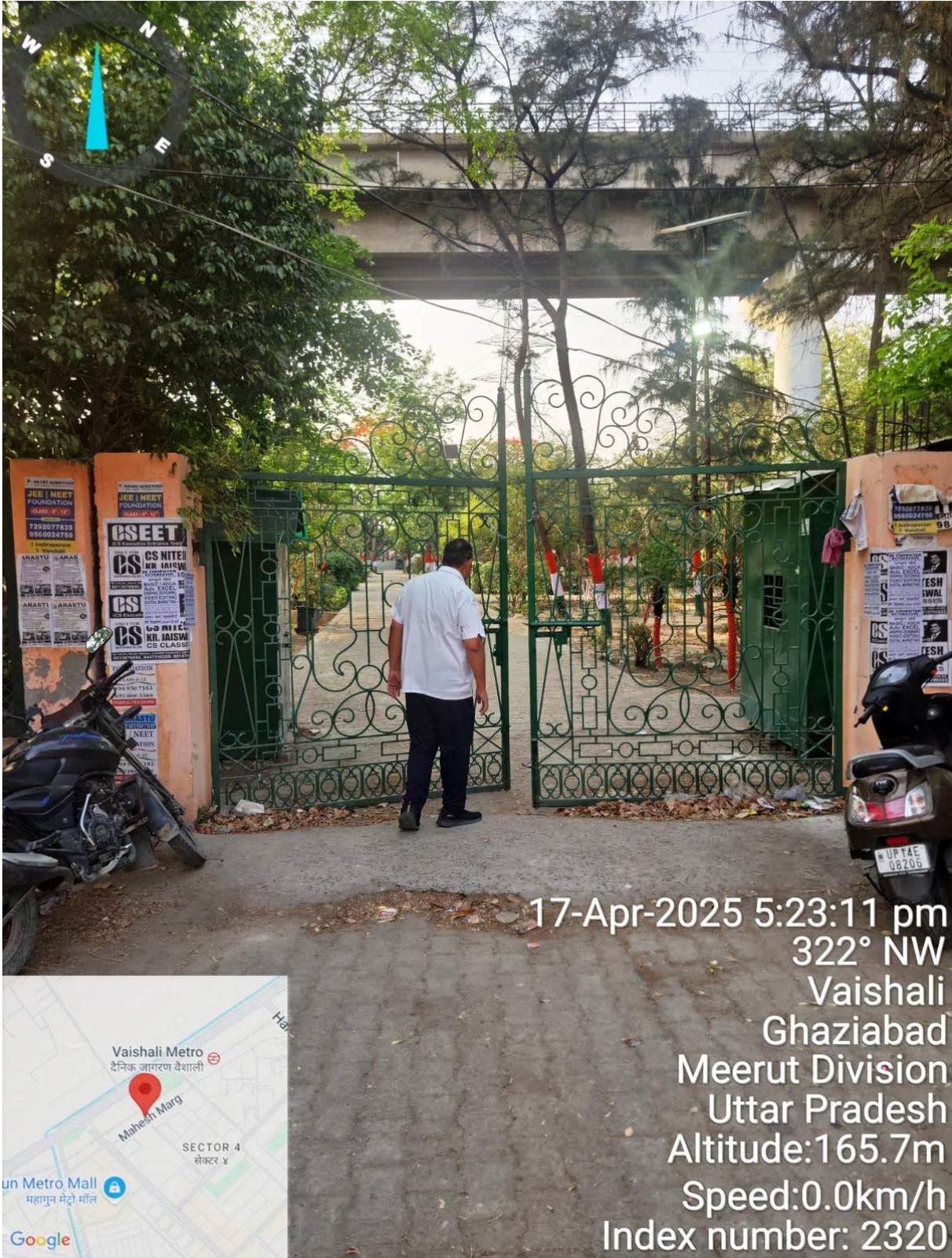


ATTESTED


NOTARY
DELHI (INDIA)

19 APR 2025

PHOTOGRAPHS OF AMBEDKAR PARK











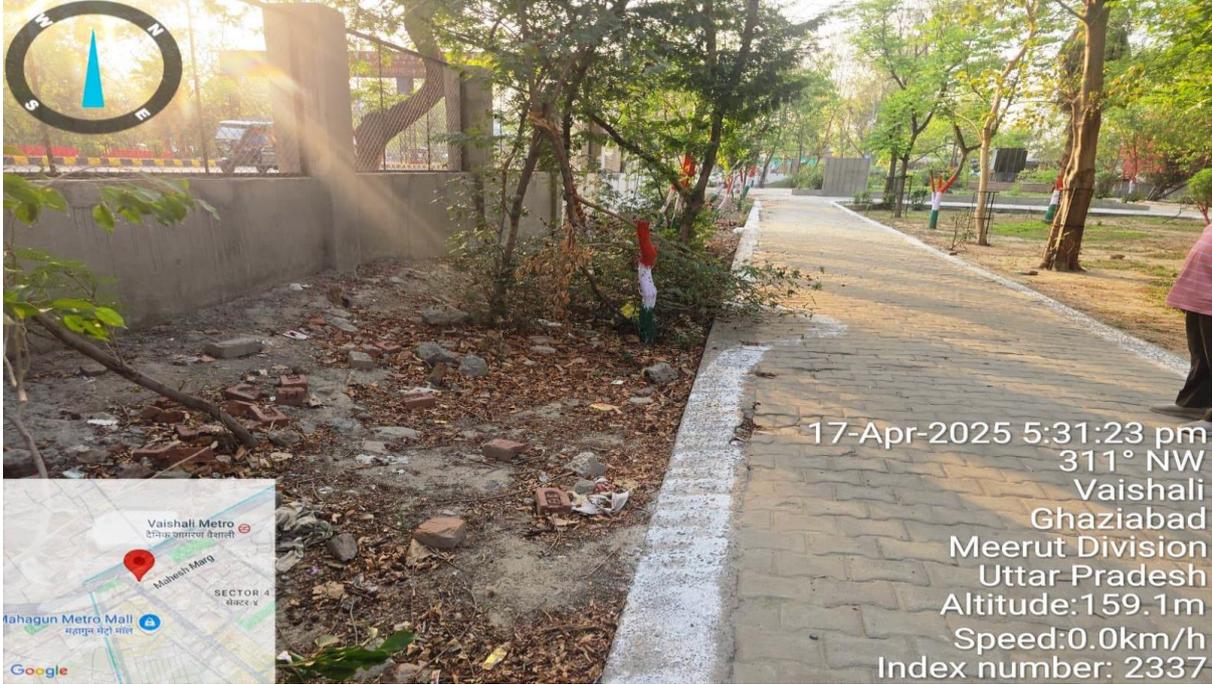
17-Apr-2025 5:30:52 pm
304° NW
Vaishali
Ghaziabad
Meerut Division
Uttar Pradesh
Altitude: 160.6m
Speed: 0.0km/h
Index number: 2336













17-Apr-2025 5:27:44 pm
246° SW
Vaishali
Ghaziabad
Meerut Division
Uttar Pradesh
Altitude:163.7m
Speed:0.0km/h
Index number: 2324



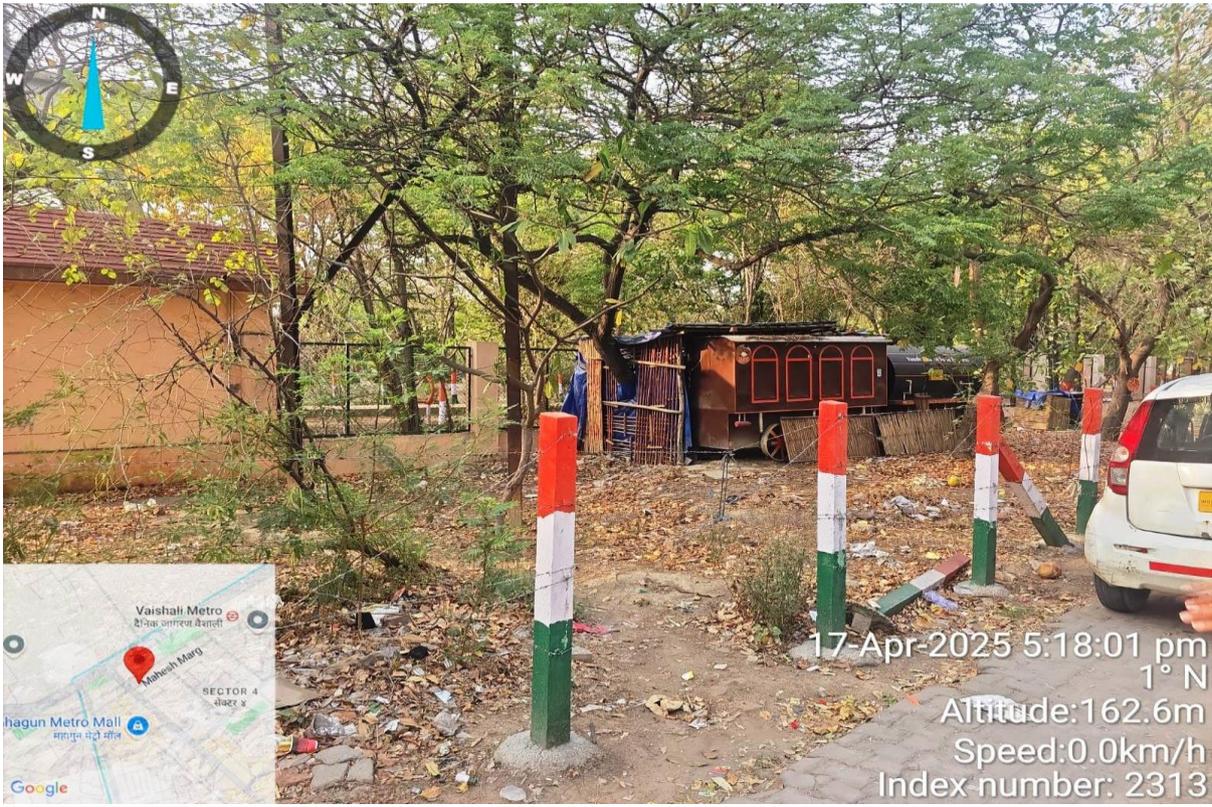


17-Apr-2025 5:24:41 pm
28° NE
Vaishali
Ghaziabad
Meerut Division
Uttar Pradesh
Altitude:164.1m
Speed:0.0km/h
Index number: 2321

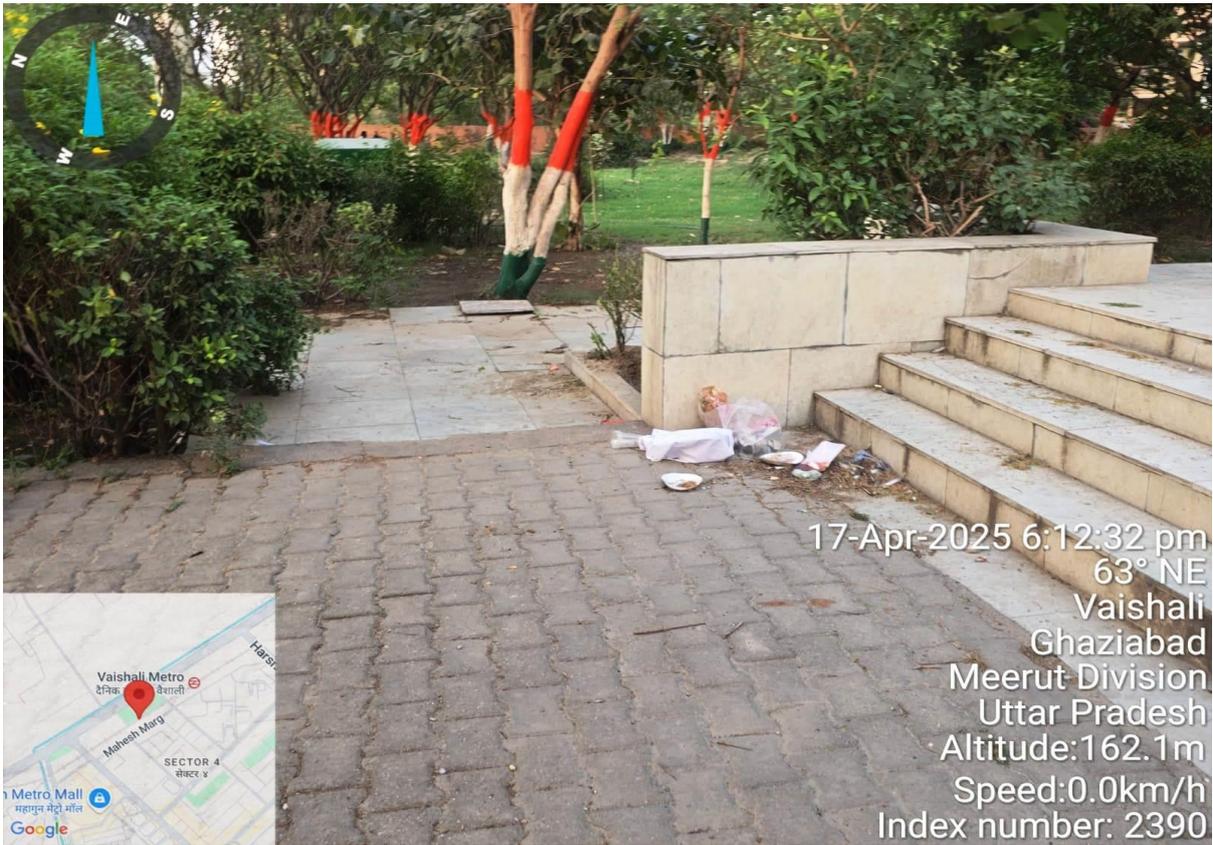


17-Apr-2025 5:29:54 pm
243° SW
Vaishali
Ghaziabad
Meerut Division
Uttar Pradesh
Altitude:163.4m
Speed:0.0km/h
Index number: 2332





PHOTOGRAPHS OF PODIUM PARK





PHOTOGRAPHS KRISHNA PARK







PHOTOGRAPHS OF CHITRAGUPT PARK







33





35

