

BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI

O.A No. 908 of 2022

Sach Sewa Samiti Nyas (Trust) ... Applicant

Versus

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

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Drafted & Filed by:

Place: New Delhi  
Date: \_\_\_\_ .09.2024

*Shivam Sakseena*  
(SHIVAM SAKSENA)

Advocate for Respondent No.4  
210, Lawyers Chamber, C.K. Daphtary Block,  
Supreme Court, New Delhi-01  
Ch.: 011 - 23073983 : MOB : 99718 85963

BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI

1

O.A No. 908 of 2022

In the matter of : -

Sach Sewa Samiti Nyas (Trust) ... Applicant  
Versus  
Ministry of Environment, Forest &  
Climate Change & Ors. ... Respondents

SUPPLEMENTARY REPLY ON BEHALF  
OF RESPONDENT NO.4, GNIDA

The Respondent above named

Most Respectfully Showeth:

1. The present case is pending consideration before this Hon'ble Tribunal, wherein a detailed reply on behalf of the Respondent No.4, Greater Noida Industrial Development Authority (GNIDA) has been filed and the same is on record.
2. Thereafter, the matter was taken-up by the Hon'ble Tribunal for further consideration on 22.8.2024 when submission, on behalf of the Applicant was made, inter-alia, to the effect that:



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Notary Advocate  
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(i). The Green Belt that had been encroached continues to be encroached notwithstanding the demolition of construction on an area of 253 sq. mtrs.

(ii). Plot No.A-1, which has been allotted by the answering Respondent forms part of the Green Belt / Green and is located entirely thereon.

3. It is the categorical submission on behalf of the answering Respondent that both the above contentions urged on behalf of the Applicant are factually incorrect, hence denied. In this regard, the answering Respondent submits the following for the kind consideration of this Hon'ble Tribunal :

(a). A proposed Lay Out Plan of this particular area, based on the Shajra map, was made in the year 1994-1995. Thereafter it received approval of the Competent Authority and was firstly revised in July 1995. Thereafter, further modifications were made on the dates which are mentioned on this plan. A copy of the said plan bearing signatures of the then General Manager (Architecture & Planning) and the then Chairman cum Chief



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Executive Officer is annexed hereto and marked as **ANNEXURE R-4/2** (Annexure R-4/1 was filed along with the reply earlier filed, hence continuity of number is being maintained).

- (b). It is clarified that, when the Plan is initially prepared and is yet to receive the approval from the Competent Authority, the word, “proposed” is written on the plan. Once the plan receives the approval, it bears the signatures of the concerned Officer(s). The proposed plan then there upon becomes the “approved plan”. Annexure R-4/2 refers to certain modifications made and this Annexure bears the date 26.2.1999. This plan is the “approved plan” with modifications made till then.
- (c). A bare perusal of the Plan filed as Annexure R-4/2 would show that a distinction has been maintained between the “Green Belt” and “Green”. The primary land use of the concerned area is Institutional. Accordingly, the land use of Plot Nos.12, 13, 15, 16, 17, 18, 19, 20, 21 and 22 is Institutional while Plot No. 14 is



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for “facility”. The “Green Belt” and “Green” is demarcated by slanting line but the difference lies in the nomenclature.

- (d). The three parallel lines, running between Plot Nos.12, 13, 14, 15, & 16 on one side and Plot Nos.17 to 22 on the other side denotes the Corridor under the High Tension Transmission Line (hereinafter referred to as the Corridor) which, as submitted in the reply earlier filed, has to be left free of any construction. It may also be noticed that somewhat triangular area on the right side of the Plot Nos.12, 13 and 16 is landlocked, therefore, it is incapable of any usage / development as a plot / capable of being allotted. This area being adjacent to the corridor is also demarcated as “Green”.
- (e). Plot No.22 is facing the 80 Mtr. wide Surajpur – Kasna Road. It may be noticed that the shape of Plot No.22 in the plan filed as Annexure R-4/2 is not rectangular. The front side, facing the road, is longer compared to the rear side. Therefore, if the shape of this plot is to be altered to a rectangular, then a triangular portion towards the corridor would emerge.



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(f). Plot No. 22 was allotted by the Respondent No.4 Authority in favour of The Diamond Drill Public School, vide Allotment intimation letter dt. 25.7.1997 (ANNEXURE R-4/3). Plot No.22 was made rectangular on 4.9.1997, as would appear from the lease plan (ANNEXURE R-4/4) annexed to Registered lease dt. 15.6.1998 while the immediate portion adjacent to the Corridor being triangular in shape was left out as would be evident from Annexure R-4/1. Since the land use of Plot No.22 from day one was Institutional, therefore, the land use of the triangular portion also remained Institutional. It is reiterated that the land use of this triangular plot was not "Green" at any point of time.

4. The Applicant has contended that as per the plan annexed to the Licence Agreement dt. 27.5.2003, this triangular portion was treated as part of the Nursery, therefore, it is also a "Green" area. This contention of the Applicant is incorrect. Since at that stage, the triangular portion was lying vacant, though its use was Institutional, with a view to obviate any encroachment etc., it was thought appropriate to make it part of the area to be given for Nursery. It is clarified that the land use of this small triangular portion carved out of



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Institutional plot No. 22 was never changed from Institutional to Green. It is a matter of record that no Nursery was ever developed and the Licence Agreement itself was cancelled. Even otherwise also, the Licence period is long over. The character / land use of any area on which there is no construction and on which for the time being grass or plants, but not trees, is allowed to be grown (though in this case, it was not even Green) does not get altered from Institutional to Green.

5A. Also from the site plan, annexed to the Licence Agreement, it can be noticed that on the right side of this site plan are Plot Nos.22 and 21. The shape of Plot No.22, as allotted, is rectangular as would appear on a combined perusal of Annexure R-4/2 with R-4/1. Further, if the boundary line towards Plot No.21 is extended straight, then it will be clear that the triangular plot, A-1 was carved out of Plot No.22 and lies outside the corridor. The boundary line on the left of the site plan is straight and matches with the boundary line of Plot no.12, which has incorrectly been typed as Plot No.13 on the Site Plan annexed to the Licence Agreement. This location / position can be verified from the fact that on the North of the site plan is the Surajpur – Kasna Road and Plot No. 12 is facing this road on the North side. It may also be noticed

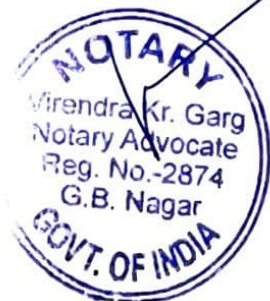


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that this site plan annexed to the License Agreement is neither made to scale nor it bears the signatures of anyone from the Planning Department, therefore, it may not be treated as accurate.

6. The Applicant relies upon a hand drawn map filed at Pg. 25 of its objections to contend that plot No. A-1 lies within the corridor and forms part of the "Green". This contention of the Applicant is equally incorrect. Plot No.A-1 lies completely outside the corridor, which fact is clear from Annexure R-4/1 and R-4/2. According to this hand drawn map, the Green facing the Surajpur – Kasna Road has a width of 54.30 mtrs. This width roughly corresponds to the width of the Corridor. This Corridor, as it proceeds Southwards, is broader compared to its North side, which fact is also confirmed from the shape of the Green in Annexure R-4/1. This hand-drawn site plan itself records that the site plan is not made to scale. It is submitted that this site plan does not prove the case of the Applicant that plot No.A-12 is located right inside the Corridor.

7. While it is correct that after the allotment of Plot No. A-1, the Allottee had made unauthorized and illegal construction on an area of 253 sq. m. into the Corridor. The extent of this illegal and unauthorized



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construction, was confirmed by the Report of U.P.P.C.B. This unauthorized and illegal construction has been completely demolished and the Corridor is totally free of any encroachment. The extent of encroachment can be noticed from a parallel line in Annexure R-4/1, running adjacent to the longest side of the triangular plot, adjacent to the Corridor.

8. It is categorically submitted that the land use of Plot No.A-1 i.e. the triangular plot when carved out of Institutional Plot No. 22 continued as Institutional. It was never ever converted as "Green" or ever used as "Green" or as Nursery. It lies outside completely the Corridor and not within. The total area of the "Green" as shown in Annexure R-4/1 continues to be 10,570 sq. m., i.e. the figure depicted on the said Annexure R-4/1.

9. It is clarified that in the Master Plan, the land use of Green Belt / Green cannot be changed. On an Institutional plot, inter-alia, abadi extension plot activity is permissible. The relevant page of the Master Plan is annexed hereto and marked as ANNEXURE R-4/5. On this



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triangular plot, which was carved out of the Institutional Plot No.22 .abadi extension was permitted on 31.10.2014.

10. In view of the above, the answering Respondent respectfully submits that the contentions of the Applicant that the land use of Plot No.A-1 is either Green or that is part of the Green Belt OR that it is located inside the Corridor are factually incorrect. The unauthorised and illegal construction made by the Allottee of Plot No. A-1 has already been demolished. It is therefore prayed that in this view of the matter, the Hon'ble Tribunal may graciously be pleased to reject the Original Application.

  
RESPONDENT NO.4  
through

Settled by  
Sh. Ravindra Kumar  
Sr. Adv.

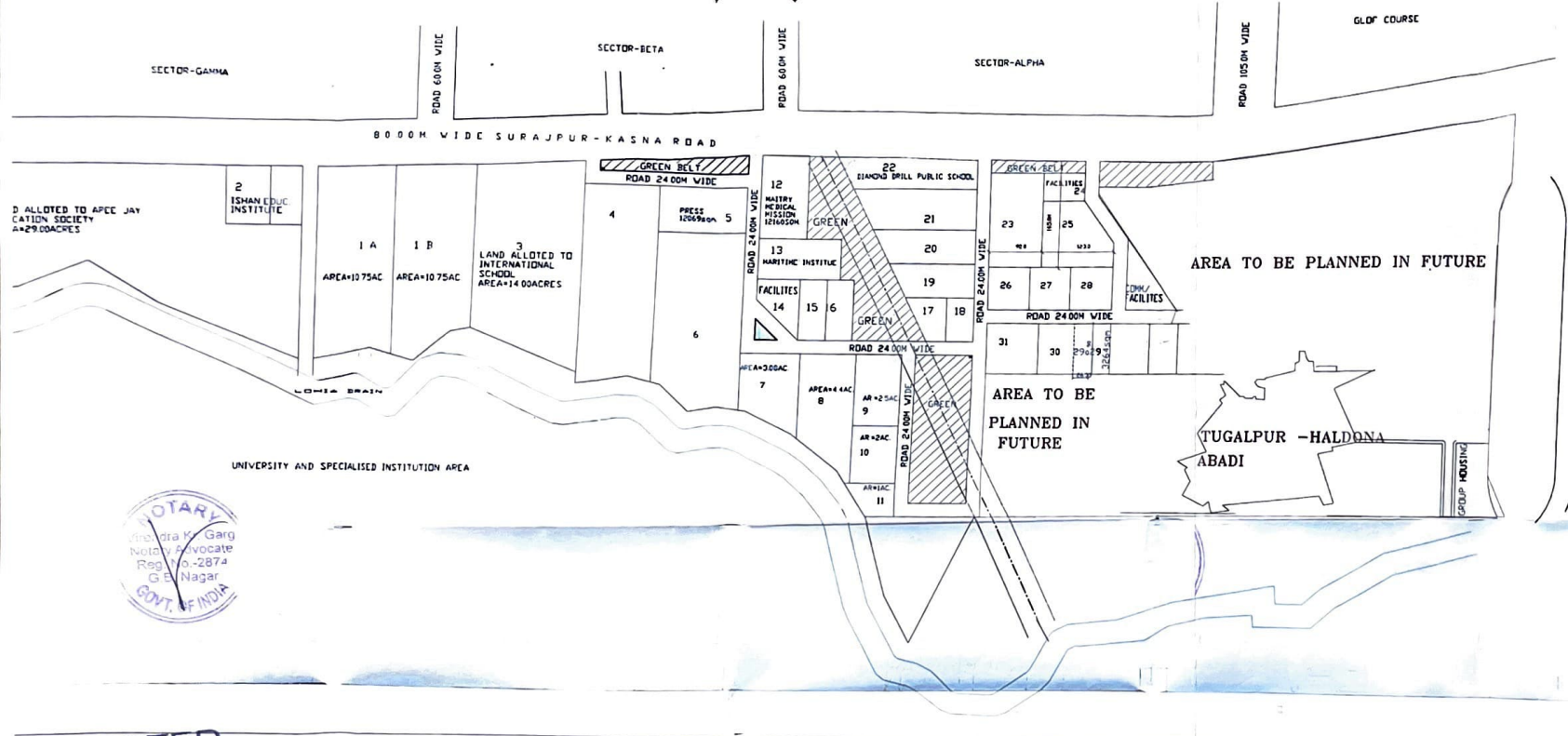
*Shivam Sakseena*  
SHIVAM SAKSENA  
(Advocate for Resp. No.4)



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10 ANNEXURE-R-4/2



LEGEND		
VACANT PLOTS SHOWN AS		
PLOT NO	AREA (IN SQM)	AREA (IN HA)
1A	43342.77	10.44
1B	12069.00	3.13
4	12069.00	3.13
5	12069.00	3.13
7	4740.00	1.19
8	4740.00	1.19
9	4740.00	1.19
10	11200.00	2.85
11	116324.00K287AC	29.03
14	4850.00	1.24
15	5000.00	1.27
16	3000.00	0.76
18	1080.00	0.28
19	8190.00	2.07
20	9991.00	2.55
21	14399.00	3.65
23	15180	3.85
24	3467.00	0.88
25	18343.00	4.61
26,28	5510.00	1.40
27	5330	1.36
29	3264.0	0.82
31	117361.39	29.29
1	7000.00	1.76
2	56657.22	14.13
3	12069.00	3.13
12	12160.00	3.13
13	8000.00	2.03
17	3500.00	0.89
22	11300.00	2.87

S.NO.	REVISIONS	DESCRIPTION	DATE
4	Modifications made in layout plan	The layout plan was modified due to site survey	15.02.99
4	Modifications made in layout plan	The layout plan was modified as per the requirements in the layout plan and approved with the consent of the Government on 18/9/98	23/12/98
3	Modifications made in layout plan	Changes made as per site survey. The layout plan was approved by the 29th Board meeting held on 18/9/98	18/9/98
3	Modifications made in layout plan	changes made as per site allotment & site survey	6/2/97
2	Modifications made in layout plan	changes made as per site allotment	25/9/96
1	Modifications made in layout plan	changes made as per site allotment	7/7/95

**PROPOSED LAYOUT PLAN FOR PUBLIC & SEMIPUBLIC AREAS**

SCALE 1:4000      DATE AUG. 1998

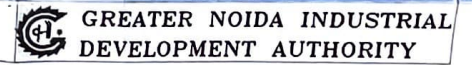
DEALT BY :

LEENU SARGAL SR. MANAGER (PLNG.)      REENA DEVIYANI G.M.(ARCH. & PLNG.)      NITA CHOWDHURY BRIJESH KUMAR A.C.E.O.      C.C.E.O.



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Annexure - R - 4/3

Regd.

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OSD (VN) E-105/97/336  
Dt. 25.7.97

To,

The Diamond Drill Public School  
Educational & Dharmarth Samiti (Regd.)  
R-2/197, Rajnagar  
GHAZIABAD.

Sub Allotment intimation letter.

Sir,

With reference to your application dated 17.4.97, we are pleased to inform you that a plot measuring 10000 sqm. in size for establishing Senior Secondary School in institutional area of Greater Noida has been allotted at the rate of Rs. 500/- per sqm. 50 percent area of the plot has been allotted free of cost.

You are requested to deposit a sum of Rs. 5,00,000=00 as allotment money within 60 days from the date of issue of this letter (i.e. on or before 17 Sept. 97). Balance 80 % amount i.e. 20,00,000=00 is to be paid in six equal quarterly interest free instalments of Rs. 3,33,334=00 each on, 16.12.97, 16.3.98, 16.6.98, 14.9.98, 13.12.98 and 13.3.99 respectively. The amount can be remitted through Bank draft/ Payorder in favour of GREATER NOIDA INDUSTRIAL DEVELOPMENT AUTHORITY Payable at Noida/ New Delhi directly to Oriental Bank of Commerce, G Block, Sector- 20, Noida, Dist. Gautam Budh Nagar under the intimation to this office. Kindly mention the name of your institution and reference of allotment letter at the back of bank draft. The copy of Terms & Conditions for Institutional allotment is attached herewith.

Encl : As above.

Yours faithfully,

*(VALSA R. NAIR)*  
25.7.97



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80.6 M. WIDE SURAJPUK-KASNA ROAD

21.00 M

PLOT NO- 22  
AREA: 11232.02 SQ M

ROAD 24.0M. WIDE

PLOT NO- 21

NOTE  
THE DIMENSIONS ARE  
SUBJECT TO VERIFICATION  
AT SITE

SITE PLAN FOR PLOT NO-  
22, AT PUBLIC & SEM.  
PUBLIC AREA, ALLOTTED TO  
DIAMOND DRILL PUBLIC SCHOOL

SCALE 1:1000

DATE 4-9-97

4/9/97  
PROJECT MANAGER (PLNG)  
S.M. (PLNG AND ARCH)

GREATER NOIDA  
INDUSTRIAL DEVELOPMENT  
AUTHORITY

ATTENDED



Notary Advocate  
Reg. No.-2874  
G.B. Nagar

13.05

GREEN



**REVISED DRAFT**  
**GREATER NOIDA MASTER PLAN 2021**

## 1. INTRODUCTION

Rapid urbanization is an intrinsic part of the development process. One of the major challenges before the nation is to provide for planned neat urban settlements with adequate greenery and open spaces rather than unplanned haphazard and polluted slum like urban settlements. The quality of the urban centre determines the quality of life of the inhabitants. Planning of a new urban centre therefore is of utmost importance for defining the quality of life.

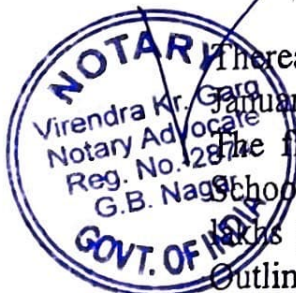
### (A) LOCATION

The new city of Greater Noida is located close to the National Capital of Delhi in the National Capital Region (NCR). It is situated in close proximity to Delhi at a distance of about 25 Kms from the border of Delhi (at Okhla Barrage). The notified area of Greater Noida comprising of 124 villages and about 38000 Ha. Of area is broadly bounded by National Highway 24 in the north-west, river Hindon in the western side and G.T. Road/Northern Railway main line to Calcutta on the eastern side. It is abutting the areas of Noida on its western side and Ghaziabad on the northern side. Due to nearness to Delhi and both these towns being well developed the pressure for development is there on Greater Noida.

### (B) BACKGROUND

The creation of Greater Noida is an outcome of the intensive pressure of the National Capital of Delhi on its periphery. On the east of Delhi, abutting the border, is located the notified area of Noida which is a planned township. Just outside the notified area of Noida, the pressures for development around Delhi and DMA started manifesting in the form of haphazard growth by colonizers and speculative land dealings in the area. The Government of Uttar Pradesh was concerned with unplanned growth in the area and initially declared it as notified area under U.P. Regulations of Building Operations Act, 1958 on 19<sup>th</sup> Sept., 1989, under U.P. Industrial Area Development Act, 1976.

Thereafter, the Government of Uttar Pradesh vide notification dated 28<sup>th</sup> January 1991 constituted Greater Noida Industrial Development Authority. The first Master Plan was got prepared by the Authority in 1992 from School of Planning & Architecture as a consultant. The plan was for 5.00 lakhs population and was then revised in NCR Plan context in 1996 as Outline Development Plan 2001 for Surajpur-Kasna sub regional centres.



## 10.2 Use Premises

Use premises means one of the many sub-divisions of a use zone, designated at the time of preparation of layout plan, for a specific main use or activity.

There shall be use premises as designated in para 10.3.

Use activities permitted in use premises are given in para 10.4

## 10.3 USE PREMISES PERMITTED IN USE ZONES

### USES/USE ACTIVITIES PERMITTED IN USE PREMISES

Sl.No.	Use Premises	USE ZONES							T1	T2	IG	Agri.	II
		R	C	M	I	Green areas							
						P1	P2						
1a.	Abadi Expansion Plots	P	NP	P	P	NP	NP	P	P	P	P	P	
1.	Amusement and Entertainment Park	NP	NP	NP	NP	P	NP	NP	NP	NP	NP	NP	
2.	Bank	P	P	P	P	NP	NP	P	P	NP	NP	P	
3.	Barat Ghar	P	P	NP	NP	NP	NP	NP	NP	NP	NP	NP	
4.	Burial and Cremation ground, cemeteries	NP	NP	NP	NP	NP	NP	NP	NP	NP	P	NP	
5.	Bus depot and workshops.	NP	NP	P	NP	NP	NP	P	P	NP	NP	NP	
6.	Bus terminal, LRT terminals/Metro Station and terminal	NP	P	P	P	NP	NP	P	P	NP	NP	P	
7.	Cargo and booking office	NP	P	P	NP	NP	NP	P	P	NP	NP	P	
8.	Cinema/Multiplex	NP	P	P	NP	NP	NP	P	P	NP	NP	P	
9.	Clinical Laboratory	P	P	P	P	NP	NP	NP	NP	P	NP	P	
10.	Community Centre/Auditorium/Banquet Hall	P	P	P	P	P	NP	P	P	P	NP	P	
11.	Convenient/Sector Shopping	P	NP	P	P	NP	NP	P	P	P	NP	P	
12.	Courts	NP	NP	NP	P	NP	NP	NP	NP	NP	NP	NP	
13.	Creche and Day Care Centre	P	P	P	P	NP	NP	P	P	NP	NP	P	
14.	Dairy Farming/Poultry farms	NP	NP	NP	NP	NP	NP	NP	NP	NP	P	NP	
15.	Dharamshala	P	P	NP	NP	NP	NP	P	P	NP	NP	NP	
16.	Dispensary	P	P	P	P	NP	NP	P	P	NP	NP	P	
17.	Drive in cinemas	NP	P	NP	NP	P	NP	NP	NP	NP	NP	NP	
18.	Educational Institutions including Training Centre	NP	NP	NP	P	NP	NP	NP	NP	P	NP	P	
19.	Fair Ground	NP	NP	NP	P	P	NP	NP	NP	NP	NP	NP	
20.	Farm House	NP	NP	NP	NP	NP	NP	NP	NP	NP	P	NP	
21.	Gas Godowns	NP	NP	P	NP	P	NP	NP	NP	NP	P	NP	
22.	Golf Course	NP	NP	NP	NP	P	NP	NP	NP	NP	NP	NP	
23.	Higher Secondary School	P	NP	NP	P	NP	NP	NP	NP	NP	NP	P	
24.	Hospital	P	NP	NP	P	NP	NP	NP	NP	NP	NP	P	
25.	Hostel, Guest House, Boarding House, Lodging house	P	P	P	P	NP	NP	P	P	NP	NP	P	
26.	Hotel	NP	P	NP	P	NP	NP	P	P	NP	NP	P	
27.	Hawkers area	P	P	P	P	P	NP	P	P	P	NP	P	
28.	Industrial plot/flatted factory plot	NP	NP	P	NP	NP	NP	NP	NP	NP	NP	P	
29.	IT Park/ unit enabled services	NP	NP	P	P	NP	NP	NP	NP	NP	P	P	
30.	Milk Chilling Centers	NP	NP	P	NP	NP	NP	NP	NP	NP	NP	NP	
31.	Motel	NP	NP	NP	NP	NP	NP	NP	P	P	NP	P	
32.	Motor garage and workshop	NP	P	P	NP	NP	NP	NP	P	P	NP	NP	

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Sl.No.	Use Premises	USE ZONES						T1	T2	IG	Agri.	IIT
		R	C	M	I	Green areas						
						P1	P2					
33.	Museum, Art Gallery, Exhibition Centre.	P	P	P	P	NP	NP	NP	NP	P	NP	P
34.	Night Shelter	P	P	P	NP	NP	NP	P	P	NP	NP	NP
35.	Nursery and Kindergarten School	P	NP	NP	NP	NP	NP	NP	NP	NP	NP	P
36.	Nursing Home	P	P	P	P	NP	NP	P	P	NP	NP	P
37.	Offices	P	P	P	P	NP	NP	NP	NP	NP	P	NP
38.	Oil depot	NP	NP	P	NP	P	NP	NP	NP	P	P	NP
39.	Open air theatre	P	P	NP	P	P	NP	NP	NP	P	P	P
40.	Orchard	P	NP	P	P	P	P	P	P	P	P	P
41.	Orphanages	P	NP	NP	P	NP	NP	NP	NP	NP	NP	NP
42.	Park	P	P	P	P	P	P	P	P	P	P	P
43.	Parking	P	P	P	P	P	P	P	P	P	P	P
44.	Petrol Pump/Fuel Station	P	P	P	P	P	P	P	P	P	P	P
45.	Plant Nursery	P	NP	P	P	P	P	P	P	P	NP	P
46.	Play ground	P	P	P	P	P	P	P	P	P	NP	P
47.	Police Lines, Civil Defense and Home Guards	NP	NP	NP	P	NP	NP	NP	NP	NP	NP	NP
48.	Public Utilities and Services/facilities	P	P	P	P	P	P	P	P	P	P	P
49.	Railway freight godowns.	NP	NP	P	NP	NP	NP	P	P	NP	NP	P
50.	Recreational Club	P	P	P	P	P	NP	NP	NP	P	NP	P
51.	Religious premises	P	NP	P	P	NP	NP	NP	NP	P	NP	P
52.	Research & Development Centres.	NP	NP	P	P	NP	NP	NP	NP	P	NP	P
53.	Residential group housing (flatted).	P	NP	P	P	NP	NP	NP	NP	NP	NP	P
54.	Residential plot/plotted housing.	P	NP	P	P	NP	NP	NP	NP	NP	NP	NP
55.	Restaurant	P	P	P	P	NP	NP	P	P	P	NP	P
56.	Rural Centre	NP	NP	NP	NP	NP	NP	NP	NP	NP	P	NP
57.	Shooting range	NP	NP	NP	NP	P	NP	NP	NP	NP	NP	NP
58.	Shopping Centres	NP	P	P	P	NP	NP	P	P	P	NP	P
59.	Social and Cultural Centre	P	NP	NP	NP	NP	NP	P	P	P	NP	P
60.	Specialised parks/theme parks and gardens	P	P	P	P	P	P	P	P	P	P	NP
61.	Sports Complex/Centre	NP	NP	P	P	P	NP	NP	NP	P	NP	NP
62.	Sports City	P	NP	NP	P	P	NP	NP	NP	P	NP	NP
63.	Storage, godowns and warehousing, cold storage	NP	P	P	NP	NP	NP	P	P	NP	P	NP
64.	Swimming Pool	P	NP	P	P	P	NP	NP	NP	P	NP	NP
65.	Transport booking office (rail, road and air)	NP	P	P	P	NP	NP	P	P	NP	NP	P
66.	Transport Nagar	NP	NP	P	NP	NP	NP	P	P	NP	NP	P
67.	Vending Booth, Kiosks	P	P	P	P	P	P	P	P	P	NP	P
68.	Weekly Market	P	P	NP	NP	NP	NP	NP	NP	NP	NP	NP
69.	Wholesale Trade	NP	P	NP	NP	NP	NP	P	P	NP	NP	NP
70.	Women's Hostel	P	NP	NP	P	NP	NP	NP	NP	NP	NP	NP
71.	Zoo	NP	NP	NP	NP	P	NP	NP	NP	NP	NP	NP

\* P-Permitted, NP-Not Permitted, R-Residential, C-Commercial, M-Industrial, I-Institutional, P1-Recreational green P2- Nurseries and Horticulture, Transportation, T2- Multi Modal Transport Hub & Multi Modal Logistic Hub, Agri-Agricultural, IIT- Integrated Industrial Township

All use premises not covered in the above table, shall be permissible in various use zones after approval of the Authority's Board.

Uses permissible in Multi Modal Transport Hub & Multi Modal Logistic Hub will be as per Activities and uses approved by Govt.

TESTED  
Virendra Kr. Garg  
Notary Advocate  
Reg. No.-2874  
G.B. Nagar



BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI

O.A No. 908 of 2022

In the matter of :-

Sach Sewa Samiti Nyas (Trust)

Versus

Ministry of Environment, Forest &  
Climate Change & Ors.



**ATTESTED**  
Virendra Kr. Garg  
Notary Advocate  
Reg. No.-2874  
G.B. Nagar

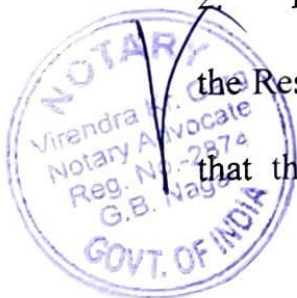
Applicant  
Respondents

AFFIDAVIT

I, Sudheer Kumar, S/o late Sh. P.L. Katiyar, aged about 55 years resident of G-04, Sector 27, Noida, presently at New Delhi, do hereby solemnly affirm and state as under :

1. That the Deponent is presently posted as Senior Manager (Plng.) with the Respondent No.4 Authority and as such I am competent and authorized to affirm this affidavit on behalf of the answering Respondent.

2. I state that the accompanying Supplementary Reply on behalf of the Respondent No.4 has been drafted under my instructions and I state that the contents thereof are true and correct to my knowledge as



**ATTESTED**

Virendra Kr. Garg  
Notary Advocate  
Reg. No.-2874  
G.B. Nagar

derived from the records of the case. The annexures to the Reply are true copies of their respective originals.



DEPONENT

VERIFICATION:

Verified at New Delhi on            day of    Sept. 2024    that the contents of this Affidavit are true and correct to my knowledge as derived from the records of the case and nothing stated therein is false and nothing material has been concealed there from.



DEPONENT



ATTESTED

Virendra Kr. Garg  
Notary Advocate  
Reg. No.-2874  
G.B. Nagar

Sudheer Kumar S/o. P.L. Katyal  
जो प्रमाणित करता हू कि श्री-----  
श्री-----निवासी-----  
जिनकी पहचान श्री-----  
के की आज दिनांक-----जो-----  
बड़े प्रातः/सायं मेरे सम्मुख इस शपथ पत्र  
को सुनकर व समझ उक्त तस्वीकार किया  
संख्या-----