

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
OA NO. 311/2022**

In THE MATTER OF:
Dr. Jeet Singh Yadav

.....Applicant

Versus

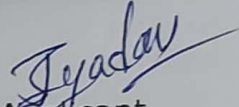
Govt. of NCT of Of Delhi & Ors

.....Respondent

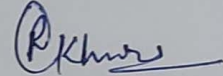
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Filed By


Applicant

Through



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Date:01.02.2025
Place: New Delhi

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**ADDITIONAL AFFIDAVIT ON BEHALF OF APPLICANT IN
COMPLIANCE OF ORDER DATED 13.12.2024**

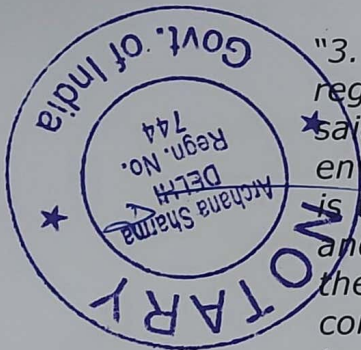
I, Dr. Jeet Singh Yadav, S/o Late Sh. Raghubir Singh, R/o H.No. 635, village and post office, Mundka, New Delhi, aged about 54 years do hereby solemnly affirm and state as under:-

1. That present OA has been filed seeking restoration of water bodies at village Mundka (Delhi). This Hon'ble Tribunal vide order dated 08.05.2023 directed the Respondent no. 3-DDA to place on record copies of the relevant revenue record related to ponds i.e. Shangoosar Jodhi, Guga Jodhi, Gulli Jodhi which has been converted into public parks.

2. That this Hon'ble Tribunal vide order dated 13.09.2023 noted the grievance of the applicant herein as under:

"3. The grievance of the applicant in the present case is regarding illegal conversion/encroachments over the above said ponds in village Mundka and the questions relating to environment which arise in the present case are as to what is the status of the above said ponds in the revenue record and what is the present status as per the existing position of these ponds. The above said ponds are stated to have been converted into public parks and the questions also arise as to when the ponds were converted into public parks, whether the procedure prescribed was followed for conversion, whether any encroachment has been made on any part of the above said parks by any person, whether any construction has been raised over any part thereof if so where and what remedial measures including removal of encroachments and demolition of existing structures have been taken/are to be taken."

3. That none of the authorities has filed the relevant record as directed vide order dated 13.09.2023 but tried to mislead this Hon'ble Tribunal by hiding the material facts.



Jeet Singh Yadav

Identify the document
signed / not ()

Jeet Singh Yadav

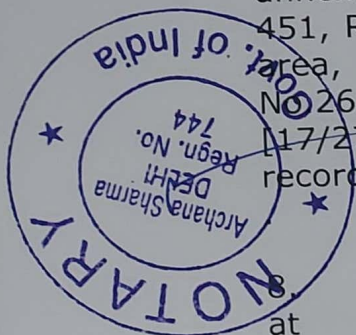
4. That this Hon'ble Tribunal vide order dated 12.10.2023 granted time to file relevant documents to applicant and the Respondent No.1 and 7.

5. That the applicant sought information and revenue record of ponds in village Mundka. The applicant was provided copy of Khatoni pertaining to ponds land in village Mundka. Copy of application under RTI and copy of Khatoni provided under RTI are at page no.262 and 263 respectively. As per said Khatoni, water body exists on 6 Khasra numbers and their respective areas of each pond is also provided. The Khasra Numbers are as under: 142, 163, 178/1, 373/1, 17/27, 190/1.

6. That list of water bodies of Delhi is available at https://dpgs.delhi.gov.in/sites/default/files/DPGS/generic_multiple_files/list_of_water_bodies_bdo.pdf. The complete PDF file is annexed with composite rejoinder as ANNEXURE-R/1 (Pg 294-392, Relevant entries at Sr No.550-554, Pg No.382-383 with Khasra No.s, area, direction/opinion etc). The water bodies mentioned at Sr. No.550 to 554 mentioned in said PDF files also contains the Khasra No. and area [178/1(1-19), 373/1(15-18), **190/1 (16-5)**, 142(3-1) and 163(4-16)] as mentioned in Khatoni placed at Pg No.263. The Respondents have admitted the water body namely Shishuwala Pond at Khasra No.**190/1**. Waterbodies are required to be restored on other khasra numbers also. There is direction/suggestion to protect/restore the water body.

7 That another list of water bodies of Delhi as available at https://dpgs.delhi.gov.in/sites/default/files/DPGS/generic_multiple_files/list_of_water_bodies_agency_wise.pdf mention at Sr. No.263 about 6th water body at Khasra No.17/27 as mentioned in Khatoni also. The list of PDF file of water bodies (agency wise) is annexed as ANNEXURE-R/2 with composite rejoinder (Pg 395-451, Relevant entries at Sr No.263, Pg No.445 with Khasra No.s, area, direction/opinion etc). The water bodies mentioned at Sr. No.263 in said PDF files also contains the Khasra No. and area [17/27 (11-8)], as mentioned in Khatoni placed at Pg No.263. It is recorded that Natural Water body exists at site.

That another list of water bodies/ponds of Delhi is available at https://dpgs.delhi.gov.in/sites/default/files/DPGS/generic_multiple_files/dda_6_0.pdf. Said list is annexed with composite rejoinder as ANNEXURE-R/3 (Pg 453-460, Relevant entries at Sr No.37-42, Pg No.457-458 with Khasra No.s, area etc). The water bodies mentioned at Sr. No.37 to 42 mentioned in said PDF files also



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contains the Khasra No. and area [178/1(1-19), 373/1(15-18), 190/1 (16-5), 142(3-1) and 163(4-16)] as mentioned in Khatoni placed at Pg No.263.

9. That it is incorrectly stated by SDM Punjabi Bagh during course of hearing on 13.12.2024 that waterbody/pond in respect of which restoration has been sought by the applicant, not recorded in revenue record. Mere non-mention of specific name of water body in Revenue Record (annexures annexed with composite rejoinder) cannot be ground to refute the waterbodies in record. Mentioning of village name, Khasra number and Rakba/Area of Pond/water Bodies is clear proof of existence of pond in revenue record. The applicant reserves liberty to initiate appropriate proceeding for making false statement before this Hon'ble Tribunal.

After passing of order dated 13.12.2024, the applicant put efforts to obtain more documents relating to waterbodies sought to be restored. The applicant could trace one map w.r.t. Lal Dora Year 1908-09. Copy of map showing status of some land of village Mundka in Lal Dora Year 1908-09 is annexed herewith as **ANNEXURE-R/1**. *The Principal Secretary (Revenue)-cum-Divisional Commissioner may kindly be directed to file an affidavit w.r.t. Chakbandi proceedings of village Mundka with record of Chakbandi proceedings and waterbodies/Johar/Talab of village mundka.*

10. That applicant has filed his submissions dated 07.11.2024 (Pg 484-512) placing on record the photos as some examples of encroachments on lands in question. If water bodies are not being restored, not only water level of ground water will continue to decrease but these lands would be remain subjected to further encroachments.

In view of the submissions made herein above, it is humbly submitted that Respondents i.e. NCT of Delhi, DSIIDC and DDA may kindly be directed to restore the waterbodies at village Mundka.

[Signature]
Deponent

Verification:

Verified at New Delhi on this 1st February that the contents of the aforesaid additional affidavit are true and correct to the best of my knowledge which I believed to be true. No part of it is false nor has anything material been concealed therefrom.

[Signature]
Deponent

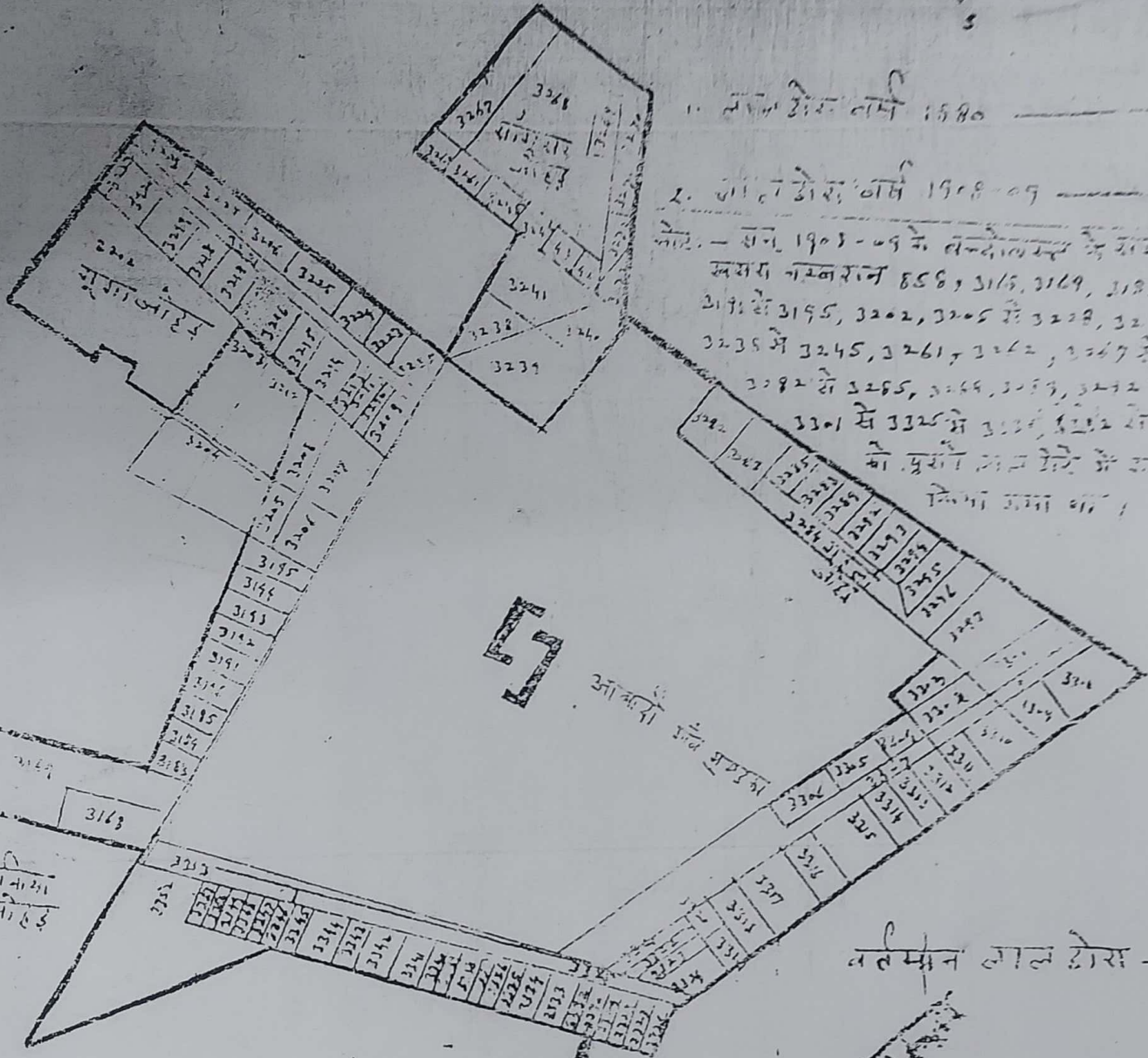
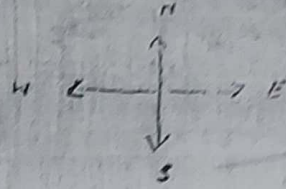
Certified that the foregoing statement was declared of solemn affirmation before me which has been read over to the deponent who has admitted

It as Correct

Notary DELHI

E. 1 FEB 2025

गाँव का नाम - गाँव
 वर्ष 1880
 वर्ष 1908-09



1. गाँव का क्षेत्र वर्ष 1880
 2. गाँव का क्षेत्र वर्ष 1908-09
 नोट - वर्ष 1908-09 के लन्दन-वर्क के याम में
 कसरी नम्बर 858, 316, 317, 318 से 3186
 319 से 3195, 3202, 3205 से 3208, 3235,
 3238 से 3245, 3261, 3262, 3267 से 3273,
 3282 से 3285, 3288, 3289, 3292 से 3294
 3301 से 3325 से 3328, 3332 से 3333
 को प्रयोग में लिये जायेगा

वर्तमान बाल दोस

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Rahul Khurana <rkhuranalegal@gmail.com>

Additional Affidavit of applicant in OA No.311/2022 Dr Jeet Singh Yadav Vs GNCT of Delhi

1 message

Rahul Khurana <rkhuranalegal@gmail.com>

1 February 2025 at 21:51

To: advocateishaansharma@gmail.com, Legal Consultus <legalconsultus@gmail.com>, danubeconsulting@gmail.com, jmalawoffices@gmail.com, pujakalra09@gmail.com, "S. C. Ladi & Co. Associates" <associates@scladi.com>

Dear Sir/Madam,

Additional Affidavit on behalf of the applicant is attached herewith as advance service.

Thanking you,

Regards,
Rahul Khurana,
Advocate-on-Record
Supreme Court on India
Mobile No. 9811894060

**Addl Aff Applicant OA 311 Jeet Singh.pdf**

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