

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH AT NEW DELHI

(In Original Application No. 249 of 2024)

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(Er. Kapil Dev)

Petitioner in Person

Date: 13-08-2025

Place: Ludhiana

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
**PRINCIPAL BENCH AT NEW DELHI**  
(In Original Application No. 249 of 2024)

Kapil Dev ..... Applicant

Vs.

State of Punjab & ors ..... Respondents

**Subject:** Additional submission by Applicant regarding continuous contamination of water as on date due to inadequate steps taken till date as well as incomplete submissions by Respondents

Hon'ble sir,

Respectfully Showeth,

The Applicants humbly submit as under:

**REGARDING ACT OF RESPONDENT NO. 3**

1. That despite passing of 11 months, the Respondent No. 3 has not disclosed the Status of land to be purchased for STP at Village Shatabhgarh such delay is resulting in contamination of surface water as well as groundwater table.

2. Further development like preparation of estimate, tender, consent to establishment from PPCB, award of contract for setting up of STP etc. have not been disclosed till Date.
3. The GPS location of proposed location and timeline for setting up of STP has also not disclosed in both the documents filed by R-3.
4. The present status of Road-cut permission from NH Authority for diversion of water flowing from Commercial Market is still not disclosed. Despite raising objections by Applicant, the R-3 has yet not submitted the letter written to National Highway. Further despite mentioning, the detail of estimate cost is also not attached with the Affidavit by R-3.
5. That towards Shiv Shakti Marble side, the sewage can be seen mixing with the water flowing towards the Pond and the condition of water in Pond is very poor and causing contamination of groundwater table. It is pertinent to humbly submit here that non-biodegradable garbage from drain connecting Pond has been cleared but same is staked on its banks even during monsoon seasons too. Six Photographs clicked on 06-08-2025 depicting mixing of sewage and poor condition of pond & its banks are produced herewith as **Annexure P-4**.

**REGARDING CONTAMINATION OF DISTRIBUTORY SITUATED AT**  
**ROAD ALONG CHATTBIR ZOO UNDER R-5**

6. That the Respondent No.5 had submitted in its reply dated 14-01-2025 that STP has been planned and land has been identified in Bakarpur Village and process of transfer of land to R-3 is underway, however not even a single document pertaining to same is produced before this Hon'ble Tribunal.
  
7. That as per R-3 & R-5, the route of sewer pipeline is private land and whether the land has been purchased or not, has not been submitted till date by the respondent MC Zirakpur as the R-5 has submitted that endeavor shall be made to complete the said work within 18-24 months thereafter. If the land couldn't be purchased & transferred in last Seven months, the time sought by R-3 & R-5 to start the project will not start and even after transfer of land in the name of R-3, efforts will be made by Respondents whereas the Respondents should have submitted a deadline to commence the working of STP.
  
8. That as per Annexure R-1 at running page no. 51, the proposed sewer line in red color has been shown upto Main NH near Gurudwara Road. It is pertinent to humbly submit here that after this point, there is natural drain and condition of this natural storm water drain (as detailed at Para

No. 4 of Main Petition) is very critical due to mixing of sewerage. The arrow marked by R-5 at Annexure R-1 depicts that the flow of sewage is towards this natural drain and even earlier, the flow was towards this direction openly. It clearly indicates that the sewage which was flowing openly in Pond will now be discharged in this natural storm water drain which will worsen the conditions. Two Photographs clicked on 06-08-2025 depicting poor condition of impugned Storm Water drainage are produced herewith as **Annexure P-5**.

9. That save and except what has been specifically admitted in this rejoinder, all other statements in the impugned reply by Respondent No. 3 & 5 shall be deemed to have been denied. The Applicant has also submitted important facts in objections dated 24-01-2025 (running Page No. 59-67) with facts. The Applicant do not admit any statements, contentions, or Submissions simply if the Applicant do not deal with them and deny them para-wise. It is further submitted that the Applicant is not filing the para-wise rejoinder to the counter affidavit of the Respondents however, the Applicants seeks leave of this Hon'ble Tribunal to file the same as and when required by this Hon'ble Tribunal.

Keeping in view of the above produced facts as well as health of Public at large, the Applicant humbly prays this Hon'ble Tribunal to kindly consider our prayer and issue directions to initiate proceedings under the provisions of Environmental laws and

impose Environment Compensation on Respondent No. 3 & 5 and applicant humbly prays that besides prayer submitted in Main Petition, the directions may kindly be issued to them to submit transparent action plan and act in time bound manner in true spirit.



Date: 13-08-2025

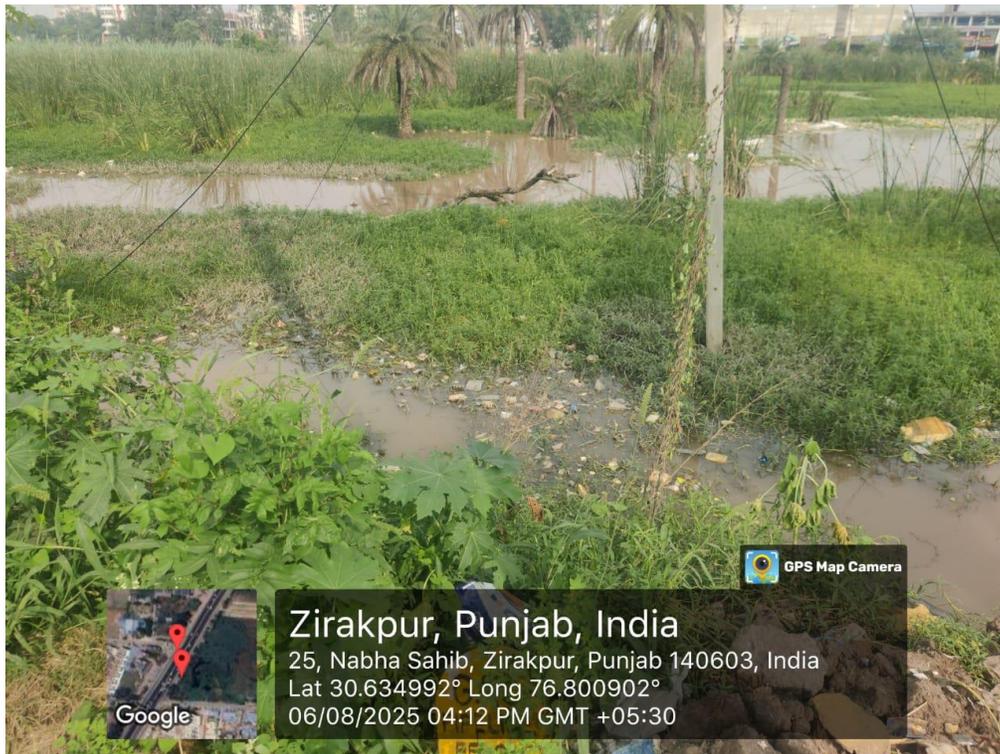
Er. Kapil Dev

Place: Ludhiana

(Petitioner in Person)

ANNEXURE P-4







ANNEXURE P-5



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH AT NEW DELHI

(In O.A No.249 of 2024)

IN THE MATTER OF:

KAPIL DEV

APPLICANT

VERSUS

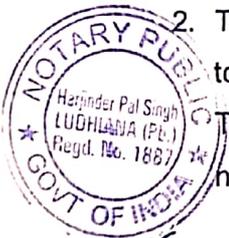
STATE OF PUNJAB & ORS

RESPONDENTS

AFFIDAVIT

Er. Kapil Dev (aged 49 years) s/o Sh. Jagdish Chander, r/o 186-E, BRS Nagar, Ludhiana do solemnly affirms as under:

1. That I am Applicant in the Original Application No. 249 of 2024 subjudice before this Hon'ble Tribunal and I am fully conversant with the present Additional Submission being filed and competent to swear to this affidavit.
2. That I have read the accompanying Additional Submission from paragraphs 1 to 9 from pages 1 to 6 and have understood the contents thereof. The facts stated there in are true and correct to the best of my knowledge and nothing has been concealed there from.



1345  
13-08-2025

3. That the Annexures are true copy of it' originals.

Certified that the affidavit S.P.A.C.P.A. has been readover & explained to the deponent executant who seemed directed to the same at the marking thereof.

VERIFICATION

Verified at Ludhiana on this 13th day of August 2025, I the above-named deponent, do hereby verify that the contents of the above affidavit are true and correct. No part of it is false and nothing material has been concealed there from.

DEPONENT

DEPONENT

know the Deponent/Executants personally and he/she has Signed/Thumb impression in my presence.

ATTESTED AS IDENTIFIED

NOTARY PUBLIC  
LUDHIANA (PB)

13 AUG 2025

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Kapil Arora <aroraengineers@gmail.com>

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## Service of documents in OA 249 of 2024

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**Arora Engineers** <aroraengineers@gmail.com>

Thu, Aug 14, 2025 at 12:39 PM

To: cs@punjab.gov.in, dc.mhl@punjab.gov.in, eomczirakpur@yahoo.in, ca@gmada.gov.in, eic.pwssb@punjab.gov.in, sachar\_anand@yahoo.co.in

Dear sirs,

PFA copy of Additional Submisison as service of document by Petitioners in O.A 249 of 2024

Regards

Er. Kapil Dev  
Petitioner No. 1  
O.A. 249 of 2024  
M: 9872007872



**Additional Submission by Applicant dt 13-08-2025 in OA 249 of 2024.pdf**  
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