

BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
O. A. No. 164 of 2024

In the matter of:

Varun Gulati

... Applicant

versus

State of Haryana & Ors.

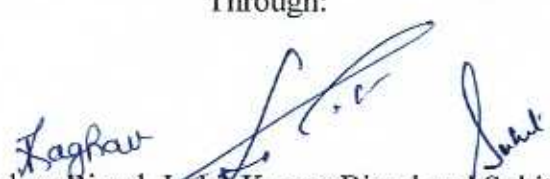
... Respondents

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Place: New Delhi  
Date: 17/6/2026

Through:

  
Raghav Bimal, Lohit Kumar Bimal and Suhit Jain  
Advocates, Anil Bimal & Associates  
Counsels For Applicant  
1818, Sector 17-A, Gurugram – 122001.  
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BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI

O. A. No. 164 of 2024

In the matter of:

Varun Gulati

... Applicant

versus

State of Haryana & Ors.

... Respondents

**ADDITIONAL REPLY ON BEHALF OF RESPONDENT NO. 6  
TO THE COMPOSITE REJOINER FILED BY THE  
APPLICANT**

**MOST RESPECTFULLY SHOWETH:**

1. That the present additional reply is being filed by Respondent No. 6, TDI Infracorp (India) Limited (hereinafter, "R-6" or the "answering Respondent"), strictly in answer to the averments contained in Para 2 (sub-paras 2.1 to 2.7) of the Composite Rejoinder filed by the Applicant, being the portion captioned "*Rejoinder to the Reply of Respondent No. 6 (TDI City)*". The contents of the Reply to the Original Application and the Objections to the Joint Committee Report already filed by the answering Respondent are reiterated and adopted herein, are not repeated for the sake of brevity, and may be read as part and parcel of the present reply.
2. At the outset, R-6 submits that the Rejoinder is misconceived: it proceeds on a selective and out-of-context reading of an internal communication of the answering Respondent, conflates the wholly distinct obligations of HSVP and of the answering Respondent, and seeks to convert the admitted pendency of the external/main sewer connection — which lies squarely within the domain of HSVP — into an alleged "admission" of illegality by the answering Respondent.

**Preliminary Objections / Submissions**

3. That the entire edifice of Para 2 rests on two documents annexed by the Applicant, namely (i) a letter dated 19.07.2025 said to have been issued by R-6 to its Resident Welfare Association (Annexure A/2), and (ii) certain photographs (Annexure A/3). Neither document supports the inference the Applicant seeks to draw.
4. That the answering Respondent's STP facility of 550 KLD capacity is installed at Block-A of the project and is fully functional and operational. As per the plans approved by the Director, Town & Country Planning (DTP), the main sewer lines of Blocks D, E and

F were sanctioned to be connected with the main sewer line of HSVP; however, the laying of the said main sewer line by HSVP is still pending. The answering Respondent has, from time to time, made several communications to HSVP regarding the laying of the said main sewer line, copies whereof are annexed herewith and marked as **Annexure R6/A**.

5. That in the absence of HSVP connectivity for Blocks D, E and F, the answering Respondent is managing the sewage generated from the said Blocks by collecting the same in septic tankers and transferring it to its own STP facility at Block-A for treatment, and is thereafter utilising the treated water for horticultural purposes within the township. The photographs/communications relied upon by the Applicant are therefore liable to be read in this context, and nothing unlawful is made out therefrom. There is no discharge of any untreated sewage by the answering Respondent into any drain, open land or green belt whatsoever.
6. That, as already submitted by the answering Respondent in its previous pleadings, owing to the low level of present occupancy in the project (approximately 22%), the sewage generation is far below the installed STP capacity — the average daily generation being of the order of about 48 KLD as against the installed capacity of 550 KLD — and there is, in effect, zero discharge. The answering Respondent has been continuously engaging with HSVP for the laying of the main sewer line so as to cater to the anticipated generation of sewage in the future, which may exceed the present installed STP capacity once occupancy rises.
7. That the obligation to lay the external/main sewer line and to provide the trunk connection to the township vests in HSVP. The Joint Committee's own Action Taken Report (ATR) dated 28.05.2024 records that the answering Respondent has provided an STP of 550 KLD at site, and the recommendation of the Committee itself contemplates that connectivity of the township's sewerage with the authorities such as PHED/MC/HSVP is to be arranged. The grievance, if any, as to the external connection is in substance a grievance against HSVP's admitted inaction, and no adverse inference can be drawn against the answering Respondent for a default attributable to HSVP.

**Para-wise Reply:**


8. That the contents of Para 2.1 to Para 2.4 are wrong and denied; and are answered in terms of the preliminary objections / submissions raised / made hereinabove.

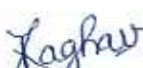


9. That the contents of Para 2.5 are wrong and denied; and are answered in terms of the preliminary objections / submissions raised / made hereinabove. It is submitted that on-site treatment (R-6's STP) and the external connection (HSVP's) are distinct subjects; affirming one and awaiting the other is consistent, not contradictory.
10. That the contents of Para 2.6 are wrong and denied; and are answered in terms of the preliminary objections / submissions raised / made hereinabove.
11. That the contents of Para 2.7 are wrong and denied and are, in any event, irrelevant to the controversy before this Hon'ble Tribunal. The reference to a press release dated 29.03.2025 of the Directorate of Enforcement (ED) and to proceedings, if any, under the Prevention of Money Laundering Act, 2002 is extraneous to the limited environmental issue arising in the present Original Application. Any such proceedings are independent, are at a preliminary/provisional stage, are sub judice before the appropriate forum, and constitute mere allegations which are denied; a provisional attachment, even if any, is not an adjudication of guilt and establishes no environmental violation by the answering Respondent. It is further submitted, without prejudice, that the imposition of Environmental Compensation by HSPCB upon the answering Respondent is itself the subject matter of a pending application for personal hearing/revocation, and the said matter being sub judice, no adverse inference may be drawn at this stage. The said averment is liable to be disregarded.
12. That in view of the above, both the composite rejoinder and the Original Application, as against Respondent No. 6, are liable to be dismissed.
13. That the answering Respondent reiterates the prayers contained in its reply to the Original Application and in its objections to the Action Taken Report.

Place: New Delhi

Date: 17/06/2026

Through:

For TDI INFRACORP INDIA LIMITED  
  
 Authorised Signatory  
 Respondent no. 6

    
 Raghav Bimal, Lohit Kumar Bimal and Suhit Jain  
 Advocates, Anil Bimal & Associates  
 Counsels for Respondent no. 6  
 1818, Sector 17-A, Gurugram – 122001.  
 Ph: +91-9540-095-755  
 Email: lohit.bimal@anilbimal.com

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... Respondents

**AFFIDAVIT**

I, Om Prakash Dhingra s/o Sh. Ladhu Ram r/o C-116, Ghanta Ghar, Hari Nagar, New Delhi – 110064, do hereby solemnly affirm and state on oath as under:

1. That I am the authorized representative of M/s. TDI Infracorp India Ltd. who is the respondent no. 6 in the present case and I am fully conversant with the facts and circumstances of the case and competent to sign and swear this affidavit.
2. That I have read and understood the contents of accompanying reply and state that the contents stated therein are true to my knowledge and based on my information, belief and legal advice.
3. That the contents of the accompanying reply may kindly be read as part and parcel of this affidavit and the same are not being repeated herein for the sake of brevity.

Place: New Delhi

Date: 17/06/2026

For TDI INFRACORP INDIA LIMITED  
*Om Prakash Dhingra*  
Authorized Signatory  
DEPONENT

**Verification:**

Verified at New Delhi on this 17th of June 2026 that the contents of the above affidavit are true to the best of my knowledge and belief and no part of it is false and nothing material has been concealed therefrom.

Place: New Delhi

Date: 17/06/2026

For TDI INFRACORP INDIA LIMITED  
*Om Prakash Dhingra*  
Authorized Signatory  
DEPONENT

17 JUN 2026

ATTESTED

NOTARY PUBLIC  
GOVT. OF INDIA





To,

Dated: 07-08-2024

Regional Officer,  
(Panipat Region)  
Haryana State Pollution Control Board  
SCO No. 55, Sec-25, HUDA, Panipat  
Haryana-

Subject: Information Regarding Sewer Line Connection for D,E and F Block TDI CITY Sec-38 & 39 Panipat -Hr.

Dear Sir

I hope this message finds you well. As you are aware, the main sewer line of TDI City D, E and F Block is scheduled to be connected with the main sewer line of HUDA. However, the laying of the main sewer line by HUDA is still pending. In the interim, as per the approved service plan of the DTCP department Haryana (DTCP Approved Service Plan attached for your reference). We are managing the sewer disposal by collecting septic tankers from D, E & F blocks and transferring the contents to our 550 KLD capacity STP plant in A- Block. After treatment, the water is being effectively used for horticulture purposes.

Thank you for your attention to this matter.

Please let us know if you need any further information.

Thanking You.

Yours faithfully,

For M/s TDI INFRACORP (INDIA) LIMITED



(Authorized Signatory)





To,

Dated: 08-08-2024

Regional officer,  
District Town Planner DTP Panipat,  
Office Complex, near Toll Plaza,  
Sector - 18, HUDA,  
Panipat, Haryana-132103

**Subject: Information Regarding Sewer Line Connection for D,E and F Block TDI CITY Sec-38 & 39 Panipat -Hr.**

Dear Sir

I hope this message finds you well. As you are aware, the main sewer line of TDI City D, E and F Block is scheduled to be connected with the main sewer line of HUDA. However, the laying of the main sewer line by HUDA is still pending. Could you please inform us when the laying of HUDA sewer line laid and connected it to our existing sewer system?

In the interim, as per the approved service plan of the DTCP department Haryana (DTCP Approved Service Plan attached for your reference). We are managing the sewer disposal by collecting septic tankers from D, E & F blocks and transferring the contents to our 550 KLD capacity STP plant in A- Block. After treatment, the water is being effectively used for horticulture purposes.

Thank you for your attention to this matter.

Please let us know if you need any further information.

Thanking You.

Yours faithfully,

For M/s TDI INFRACORP (INDIA) LIMITED

(Authorized Signatory)

Received Complaint TDI

9/8/2024

प्रबन्धक लिपिक  
जिला नगर योजनाकार (म)

TDI INFRACORP (INDIA) LTD.  
(Formerly known as Taneja Developers & Infrastructure (Panipat) Ltd.)

To,

Regional officer/ XEN- HSVP PANIPAT  
District Town Planner Panipat,  
Office Complex, near Toll Plaza,  
Sector - 18, HSVP,  
Panipat, Haryana-132103

Dated: 01-04-2025

Subject: Request Regarding Sewer Line Connection for TDI CITY Sec-37 & 39 Panipat -Hr.

Dear Sir,

I hope this message finds you well. As you are aware, the main sewer line of TDI City is scheduled to be connected with the main sewer line of HSVP. However, the laying of the main sewer line by HSVP is still pending. Could you please inform us when the laying of HSVP sewer line laid and connected it to our existing sewer system?

In the interim, as per the approved service plan of the DTCP department Haryana (DTCP Approved Service Plan attached for your reference). We are managing the sewer disposal by collecting septic tankers and transferring the contents to our 550 KLD capacity STP plant in A-Block. After treatment, the water is being effectively used for horticulture purposes.

Thank you for your attention to this matter.

Please let us know if you need any further information.

Thanking You.

Yours faithfully,

For M/s TDI INFRACORP (INDIA) LIMITED



[ Received on  
2/4/25 ]

[ P  
2/4/25 ]

(Authorized Signatory

TDI INFRACORP (INDIA) LTD.  
(Formerly known as Taneja Developers & Infrastructure (Panipat) Ltd.)

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U G F, Vandana Building, 11 Tolstoy Marg,  
Connaught Place, New Delhi - 110 001  
Tel : 4311 1111(100 lines) Fax : 43111199  
URL : www.tdiinfracorp.com Email : info@tdiinfracorp.com