

10649

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

AT NEW DELHI

ADDITIONAL SUBMISSIONS ON BEHALF OF THE
APPLICANT

IN

ORIGINAL APPLICATION NO. 6 OF 2012

In the matter of:

Nizamuddin West Association (Regd.) ... Applicant

Versus

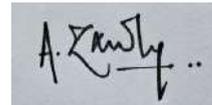
Union of India and Others ... Opposite Parties

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Place: New Delhi

Date: 4.7.24



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1. Applicant has already filed Written Submissions dated 27.06.2024. This is in continuation of that document. It deals with the justification for the specific directions sought in I.A. 72/2024, I.A. 276/2024 and E.A. 5/2024. Given the emergency situation that has arisen on account of the massive overflow of the Barapullah Nallah into the houses of the residents adjoining the Nallah. This attempt is made by the applicant to clearly outline the nature of the reliefs sought in a practical way so that the results may be achieved in the shortest possible time and hopefully during the period of this monsoon itself. The expectation is that the results of the implementation of the orders passed by this Hon'ble Tribunal will be felt during this monsoon period itself by an action plan for

dredging and desilting which should start on a war footing immediately. Secondly, that the STPs which have not been put in place be completed within this year itself. This requires full cooperation by the authorities.

2. To recapitulate, in the earlier written submission dated 27.06.2024, the applicant pointed out that in the NGT order dated 13.01.2015 and 27.01.2021 this Hon'ble Tribunal, time and again directed the setting up of 55 STPs for the Delhi area. This was to be completed by 31.3.2017. This was not done. No explanation has been given by any of the respondents for this non-compliance. The disobedience of the Court orders has directly contributed to the emergency of severe flooding on 28.6.2024 and thereafter.
3. The question before the Hon'ble Tribunal is what meaningful and immediate actions can be taken to bring immediate reliefs **to prevent the recurrence of flooding during the present monsoon** and also permanent reliefs at least by the end of the year 2024 to ensure that all sewage is treated in STPs **by immediately constructing the remaining 17 STPs-** that were ordered to be constructed vide order dated 13.1.2015 and were not so constructed- **before the end of this year.**

Dredging and Desilting

4. On the last date of hearing, the applicant pointed out the 7 stretches of the Barapullah Nallah which required dredging and desilting on a war footing. The applicant also pointed out the length and width of each stretch and depth of approximately 1.8 metres, to arrive at the total volume of debris and sludge etc. to be removed. The total volume comes to approximately 9.16 Lakh cubic metres. On the last occasion, the applicant gave an estimate of Rs. 900 per cubic metre. To dredge and transport the debris from the nallah.

However, based on the recent tender of Irrigation and Flood Control Department for a short stretch of the Barapullah Nallah, the estimate of Rs. 900 per cubic metre. is now revised to Rs. 3000 per cubic metre. Therefore, the total projected amount required for controlled dredging of the Nallah carriageway in all 7 stretches / segments would approximately be Rs. 275 Crores.

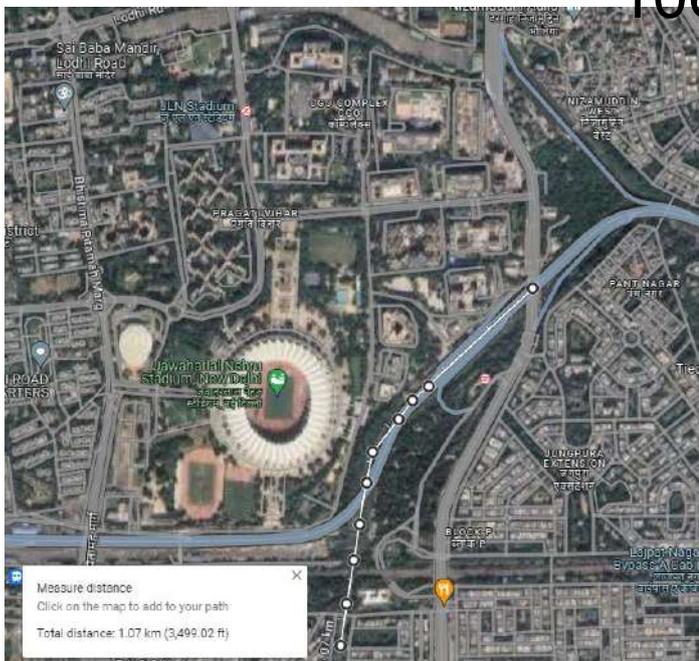
5. Responding to a query of this Tribunal that as to how the dimensions of the stretches (at Page 51 to 59 of the Written Submission dated 27.6.2024) have been calculated, the applicant states that distances have been generated on 'Google Maps' which are annexed herewith as **Annexure-A**.
6. Responding to a query of this Tribunal that as to how the depth of dredging in the stretches (at Page 51 to 59 of the Written Submission dated 27.6.2024) has been calculated, it is submitted that along with the historical photograph of Barapulla Bridge at page 60 of the earlier written submission a scaled photograph is submitted at **Annexure B** hereto, illustrating that approximately 6 feet (1.8 meter) of sludge and debris has filled the entire carriage way of the Barapulla Nallah.
7. The photographs at Annexure B also show the Barapullah Nallah carriageway in the year 2008 i.e., before the construction of elevated road started. The photograph show the chambers constructed in the bed of the nallah to allow the periodic cleaning and servicing of the nallah clearly visible. Current photograph of 2024 show the chamber completely covered in debris and silt, largely left behind durinf the construction of the elevated road.

Sewerage Treatment Plants (STPs)

8. By referring to the Status report dated 23.4.2024 submitted by the GNCTD it was submitted by the applicant on the last date of

hearing that the status report itself shows that **17 STPs are yet to be constructed**. This is admitted by all the respondents. These 17 STPs are expected to deal with the untreated sewage in Delhi as of today. It is undisputed that the volume of this untreated sewage is 297 MGD at the very least. Applicant says so because **of the existing 35 STPs it is now disclosed in the status report that only 10 are functioning**.

9. Taking a rough ball park figure, an average sized 17 MGD STP cost approximately **Rs. 40 Crores** and requires **land to be immediately allotted by the DDA headed by the Hon'ble LG**. The total cost of the above mentioned 17 STPs ranging from a capacity of 2 to 40 MGD is approximately **Rs. 680 Crores** apart from the cost of land. The construction of 1 STP should take approximately 6 month (with a shorter time for a smaller STP), if the work is done on a war footing with labour working in 3 shifts.
10. The DJB has a history of working with professional contractors skilled in the construction and maintenance of STPs. The work of constructing 17 STPs, in the first instance may be divided among various contractors so that the work may start simultaneously and finish before the end of this year.
11. Hence, the applicant prays that the DJB be directed to keep a senior technical person present in Court during the hearing of these proceedings and information be provided forthwith on the following points:
 - a. The location of the proposed 17 STPs together with their individual capacity,
 - b. The cost of each STP,
 - c. The timeline for construction and commissioning on the war footing as stated earlier.

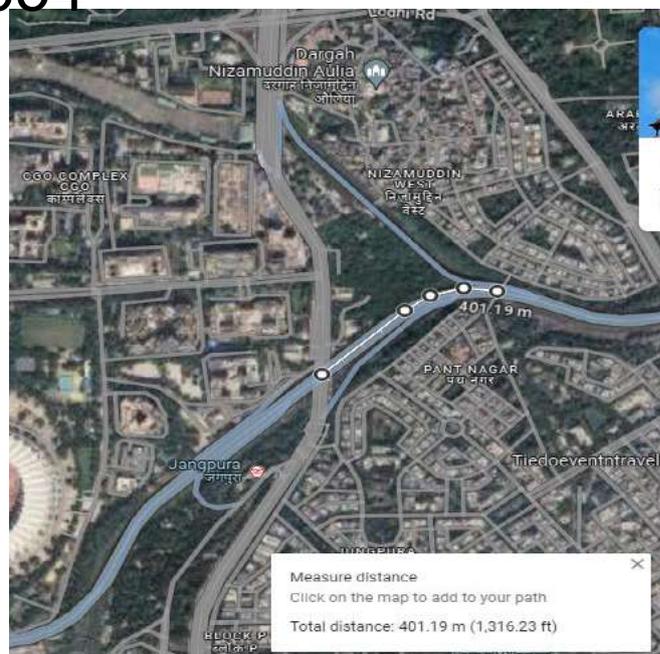


A1-A2

LENGTH: 1070 meters

WIDTH: 60 meters

DEPTH: 1.8 meters

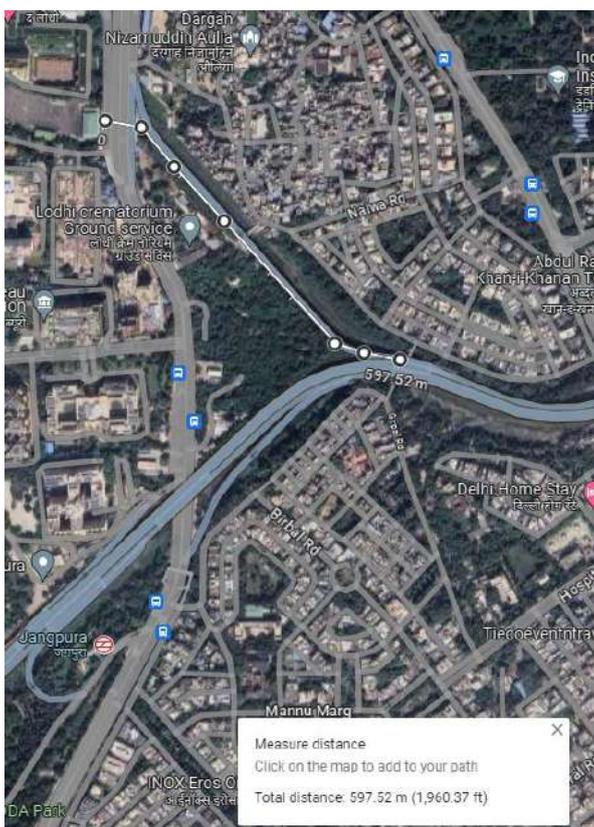


A2-A4

LENGTH: 400 meters

WIDTH: 80 meters

DEPTH: 1.8 meters

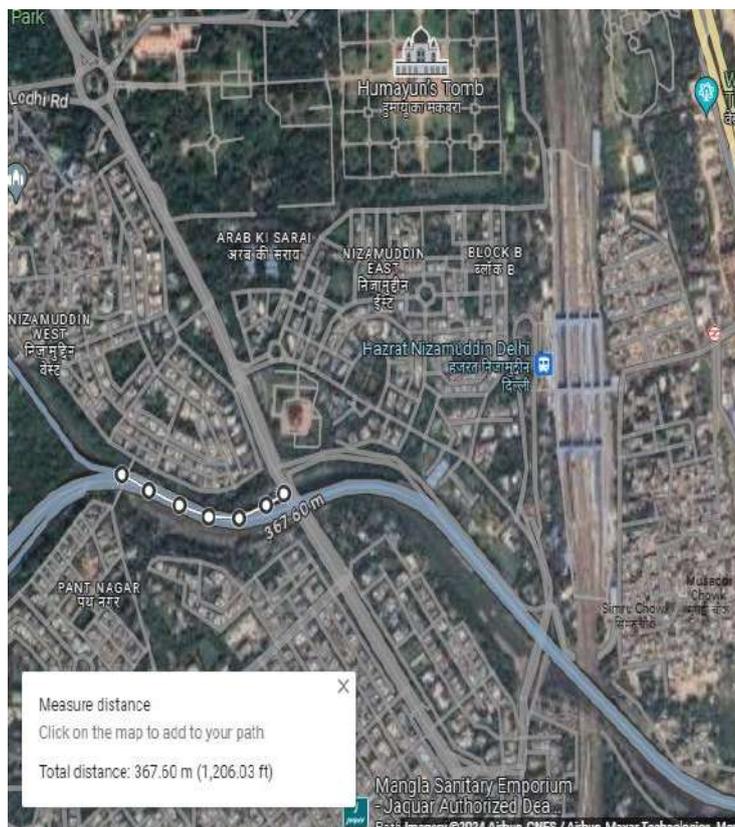


A3-A4

LENGTH: 600 meters

WIDTH: 65 meters

DEPTH: 1.8 meters

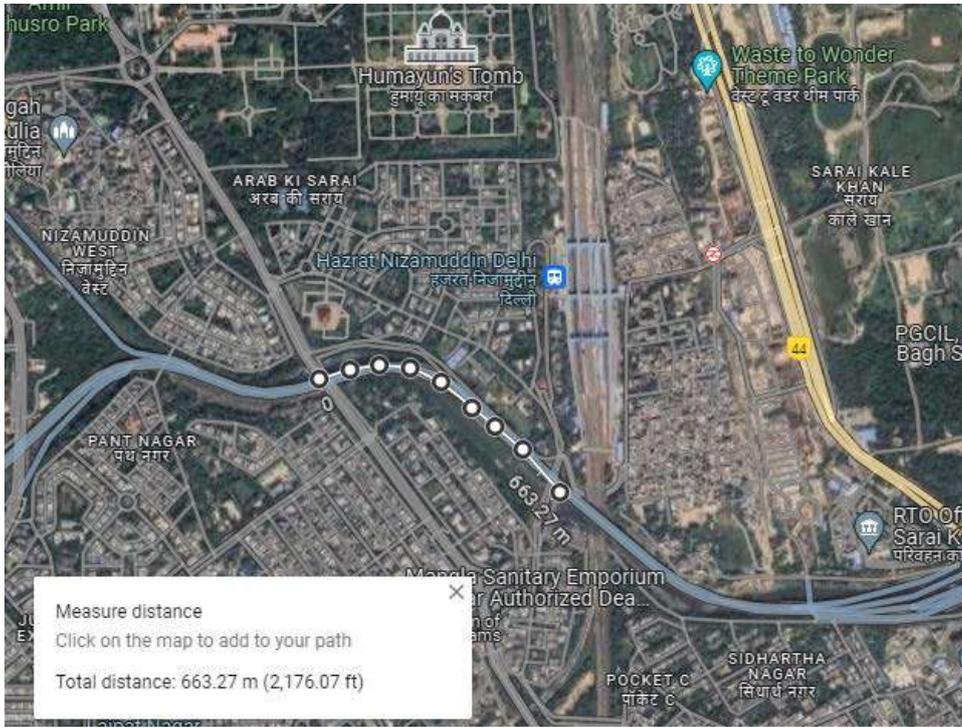


A4-A5

LENGTH: 370 meters

WIDTH: 85 meters

DEPTH: 1.8 meters



A5-A6

LENGTH: 660 meters

WIDTH: 100 meters

DEPTH: 1.8 meters

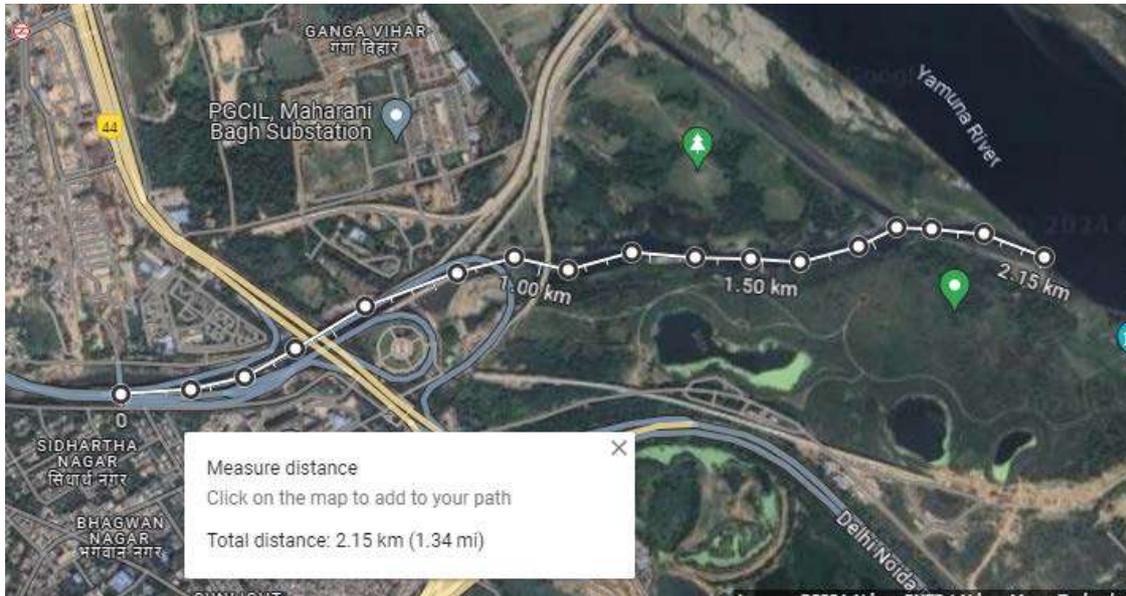


A6-A7

LENGTH: 680 meters

WIDTH: 100 meters

DEPTH: 1.8 meters



A7-B

LENGTH: 2150 meters

WIDTH: 100 meters

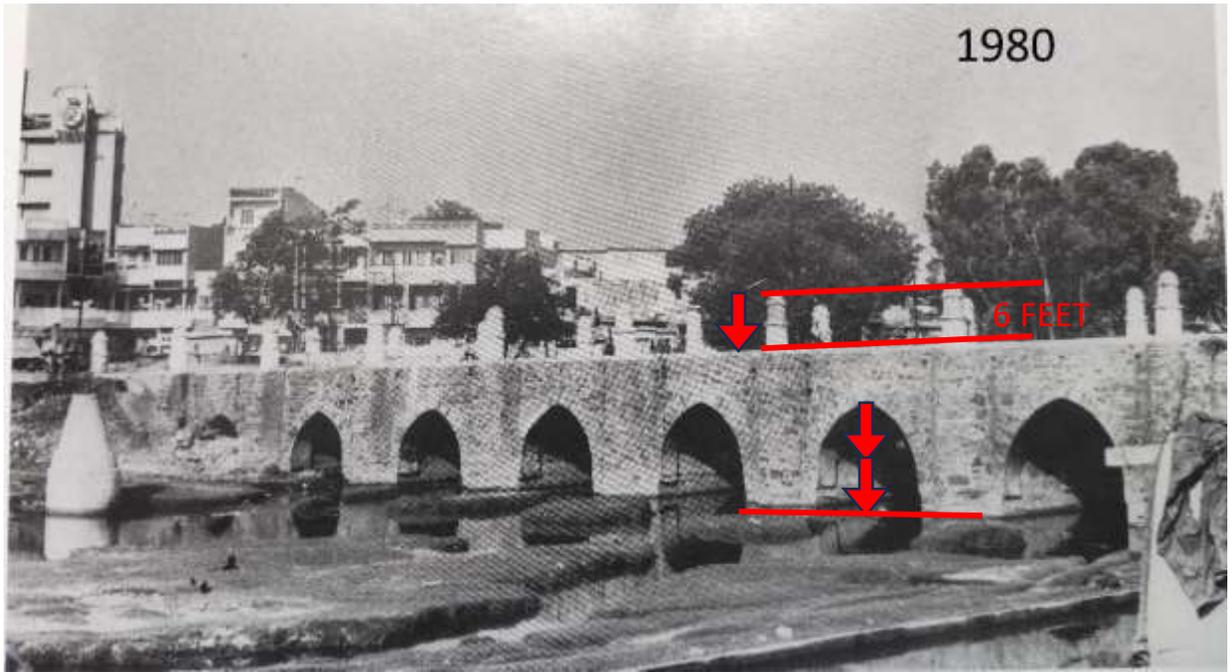
DEPTH: 1.8 meters

The dredging and desilting of the Barapullah Nallah has to be done in 7 segments for which the data is given below:

Segment	Estimated Volume of debris	Estimated cost in clearing / cleaning the Nallah including lift and lead at Rs. 3000 per cubic meter.
A1-A2	LENGTH: 1070 meters WIDTH: 60 meters DEPTH: 1.8 meters VOLUME: 115,560 cubic meters	Rs. 34.66 Crores
A2-A4	LENGTH: 400 meters WIDTH: 80 meters DEPTH: 1.8 meters VOLUME: 57,744 cubic meters	Rs. 17.32 Crores
A3-A4	LENGTH: 600 meters WIDTH: 65 meters DEPTH: 1.8 meters	Rs. 20.98 Crores

	VOLUME: 69,966 cubic meters	
A4-A5	LENGTH: 370 meters WIDTH: 85 meters DEPTH: 1.8 meters VOLUME: 56,304 cubic meters	Rs. 16.89 Crores
A5-A6	LENGTH: 660 meters WIDTH: 100 meters DEPTH: 1.8 meters VOLUME: 119,520 cubic meters	Rs. 35.85 Crores
A6-A7	LENGTH: 680 meters WIDTH: 100 meters DEPTH: 1.8 meters VOLUME: 110,160 cubic meters	Rs. 33.04 Crores
A7-B	LENGTH: 2150 meters WIDTH: 100 meters	Rs. 116.10 Crores

	DEPTH: 1.8 meters VOLUME: 387,000 cubic meters	
Total	Volume- 916,254 cubic meters	Rs. 274.84 Crores



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Historical photo of Barapulla nala before construction of Elevated road, 2008, showing clear carriage way.



Current photo of Barapulla nala , 2024, showing only 2.0 M (6Feet-8 Inches) clear carriage way below the bridge



**BEFORE- RECENT DREDGING
MUD STACKED INSIDE NALA**



**28.6.2024- STACKED MUD IS
UNDER WATER**



**STACKED MUD AND DEBRIS ALL
WASHED INTO NALA**



**WATER IN NALA BELOW
MATHURA ROAD**