

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
SOUTHERN ZONE BENCH AT CHENNAI**

IN

ORIGINAL APPLICATION NO. 06 OF 2026

IN THE MATTER OF:

Shuhool Fotedar & Anr. **APPLICANTS**

Versus

The Chairman, The Karnataka Urban Water Supply and Drainage Board
(KUWSBD) & Ors. **RESPONDENTS**

Previous D.O.H: 19.01.2026

Next D.O.H: 13.03.2026

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DATED: 11.03.2026

PLACE: DELHI

FILED BY APPLICANTS (PETITIONERS IN PERSON):



SIGNATURE OF APPLICANT NO.1 (SHUHOOL FOTEDAR)



SIGNATURE OF APPLICANT NO.2 (VINOD FOTEDAR)

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(KUWSBD) & Ors.**RESPONDENTS**

ADDITIONAL AFFIDAVIT ON BEHALF OF THE APPLICANTS:

The Applicants i.e. Shuhool Fotedar and Vinod Fotedar hereby solemnly affirm and declare as follows:

1. That formal notices have been privately issued to each respective respondent via Speed Post as well as electronic mail, and the proof of service is attached as **Annexure A-10** (Colly). Furthermore, this Additional Affidavit has also been forwarded to the respective respondents over E-mail.
2. That during the first hearing of the present matter on 19/01/2026, the Hon'ble Bench requested specific information regarding the case and requested the Applicants to file an Additional Affidavit furnishing the following:
 - How much sewage waste is currently being managed?
 - How many residents reside in the layout?
 - How much waste is currently being produced?
 - What is the status of waste discharging from neighboring localities?

3. The Applicants have provided the information sought by the Hon'ble Tribunal within the corresponding sections of this affidavit. Furthermore, additional relevant information has been incorporated to comprehensively apprise the Hon'ble Tribunal of the critical details and to assist in the adjudication of the matter.

I. Existing Sewage Management Infrastructure at Vasundhara Layout (Current Sewage Waste Managed):

4. That Vasundhara Layout is presently equipped with a decentralized, small-scale Sewage Treatment Plant (STP). The electricity bills for this facility are being paid by the Residents' Welfare Association (RWA) as verbally communicated by the RWA. The Satellite view picture of the STP is annexed herewith as **Annexure – A11**.
5. While the RWA claims that the STP is partially functional, the quality of its output does not inspire confidence that such effluent should be safely discharged. The RWA further claims that it is in touch with CMC Hebbagodi and will undertake the appropriate upgrades after consulting with the CMC. A copy of the letter sent to CMC Hebbagodi by the Vasundhara RWA regarding this matter is annexed herewith as **Annexure – A12**.
6. That this existing infrastructure was explicitly designed and scaled for the specific capacity of Vasundhara Layout. Despite having so much land available to scientifically construct the Underground Drainage/Wetwell/STP, the authorities have for years now chosen sites without due diligence causing public agitation and opposition.

II. Demographic Assessment and Sewage Load Calculation (Residents and Waste Produced)

7. That the existing STP of Vasundhara Layout was designed by the Developer as per the Approved Layout Plan. The approved layout plan which has been

annexed as **Annexure – A5** at Page 38 in the main Original Application officially sanctions a total of 520 plots and currently there are about **200** developed plots in Vasundhara Layout.

8. Applying the standard legal and demographic estimation of 4 residents per household, the population of Vasundhara Layout is calculated as follows:

$$\underline{200 \text{ developed plots} * 4 \text{ persons} = \mathbf{800 \text{ residents}} \text{ (approx.)}}$$

9. Applying the Central Public Health and Environmental Engineering Organisation (CPHEEO) guidelines for Indian urban norms, water consumption is estimated at 135 Liters Per Capita Per Day (LPCD), with sewage generation calculated at 80% of total water consumption. This benchmark of 135 LPCD is given on Page No.10 of the Handbook of Service Level Benchmarking issued by the Ministry of Urban Development, Government of India and is herewith annexed as **Annexure – A13**. The mathematical projection for waste produced is as follows:

$$\underline{800 \text{ residents} * 135 \text{ LPCD} * 0.80 = \mathbf{86,400 \text{ Liters of Sewage Per Day}} \text{ (approx.)}}$$

10. It is submitted that the layout's existing STP was intended to handle this localised load. Furthermore, several occupied residential buildings are situated within a mere 30 feet of this STP.

III. Opaque Practices of Adjoining Localities and Threats to Residents (Waste from Neighbouring Localities)

11. That when local residents of Vasundhara Layout attempted to conduct lawful inquiries into the sewage disposal mechanisms of neighbouring layouts, some of the layouts claimed to have STPs but when residents further inquired regarding the exact details of their sewage disposal mechanisms, alarmingly certain residents received threats warning them to cease all inquiries regarding neighbourhood sewage disposal practices. Considering the condition of the Rajakaluves and the open discharge of sewage, it is evident that these

neighbouring layouts either do not have STPs, or if they do, they are non-functional.

12. That Recently one of the neighbouring layout i.e. Amulya Layout forcefully connected to Vasundhara's Private Sewage Network without caring about the overflows within the sewage network of Vasundhara Layout.
13. Considering the contamination of the Kammasandra Lake and groundwater contamination, it is imperative that in such a situation, the City Municipal Council (CMC) Hebbagodi be formally directed to launch an immediate, transparent inquiry into the neighbouring layouts and industrial establishments nearby to identify the source of the unauthorized waste discharge.

IV. Direct Photographic Evidence of Environmental Degradation at Kammasandra Lake

14. That to demonstrate the severe and ongoing environmental violations, reliance is placed upon the annexed photographic evidence detailing the immediate ground reality of Kammasandra Lake and its buffer zone:
15. **Hydrological Impact:** A High-level Satellite view of densely populated north, south and west side of Kammasandra lake and the Kammasandra Lake and its buffer zone is herewith annexed as **Annexure A-14**. The water from Kammasandra lake and its neighbouring lakes potentially flows to Muthanallur lake in the southeast. The East, northeast and southeast region is luckily not a concrete jungle yet and this region can potentially be used for constructing the proposed Wet Well/STP as it is far away from the densely populated regions and won't face public agitation. This region, given the natural flow of water, may support gravity driven sanitation also.
16. **Unauthorized Sewage Discharge (Rajakaluves):** Furthermore, another satellite picture of the Kammasandra Lake is annexed herewith as **Annexure A-15** and is depicting three locations where hazardous sewage water, channeled from local communities and establishments enters the drain that has

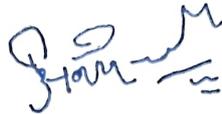
been recently constructed to protect the lake. These channels are most likely natural rainwater channels known as Rajakaluves.

17. **Defective Drainage Infrastructure:** These drains near the Kammasandra lake were supposed to carry the excess water from the Lake to the surrounding drain, but during heavy rains the overflowing drains push contaminated water back to the Lake. Pictures of the drain are annexed herewith as **Annexure A-16**. The pictures showing contamination of the Kammasandra lake and dead fishes have been earlier annexed as **Annexure-A1** at Page No. 20 in the main Original Application. Also, given that the lake water is getting blackish day by day, even during the non-rainy season, it seems that sewage might be leaking from the surrounding drains and finding its way into the lake.
18. **Solid Waste Dumping:** Extensive garbage is also actively being littered along the lake's perimeter and squarely within its protected buffer zone and the photographic evidence for the same is annexed herewith as **Annexure A-17**.
19. **Commercial Exploitation of Contaminated Groundwater:** Highly alarming photographic evidence captures commercial water tankers waiting to be filled directly from borewells situated within the Kammasandra Lake buffer zone. Given the severe toxicity of the Lake and groundwater, the extraction and potential distribution of this groundwater poses an unimaginable risk to human health and public safety. The photograph capturing the water tankers is herewith annexed as **Annexure A-18**.
20. **Ecological Fatalities:** The lethal toxicity of Kammasandra Lake's water is proven by photographic records showing the death of migratory birds and fish. The immediate environment has become fatal to local fauna, further underscoring the severe hazard posed to any humans exposed to or consuming this water. The photographic evidence supporting the same is herewith annexed as **Annexure A-19**.

FILED BY APPLICANTS (PETITIONERS IN PERSON)



SIGNATURE OF APPLICANT NO.1 (SHUHOOL FOTEDAR)



SIGNATURE OF APPLICANT NO.2 (VINOD FOTEDAR)

VERIFICATION

Verified on this 12th day of March, 2026 at Delhi, that the contents of the above additional affidavit are true and correct to the best of the Deponents' knowledge, derived from records, physical inspections, and photographic evidence, and that no part of it is false and nothing material has been concealed therefrom.



DEPONENT 1 (SHUHOOL FOTEDAR)



DEPONENT 2 (VINOD FOTEDAR)

ANNEXURE A-10 (Colly): Proof of service of formal notices privately issued to each respective respondent via Speed Post and electronic mail.



Department Of Posts

Multiple Article Receipt

Office Name : Dwarka Sec-6 S.O User ID : 10054943

Date & Time : 04/02/2026, 15:41:22

Mode of Payment : Cash

Booking Ref. ID : 1566034404022694200

Sl. No.	Article Number	Product Type	Weight (in gms)	Sender Name	Receiver Name	Base Tar-iff (Incl. VAS)	Remarks	Created
1	ED872589075IN	SP_INLAND_DOC	20	SHUHOOL FOTEDAR	THE CHAIRMAN, KARNATAKA STATE BPOLLUTION CONTROL BOARD , 560001	47		100549
2	ED872589084IN	SP_INLAND_DOC	20	SHUHOOL FOTEDAR	THE CHAIRMAN, KARNATAKA URBAN WATER SUPPLY AND DFRAINAGE BOARD , 560029	47		100549
3	ED872589053IN	SP_INLAND_DOC	20	SHUHOOL FOTEDAR	THE MUNICIPAL COMMISSION-ER, HEBBAGODI CITY MUNICIPAL COUNCIL , 560099	47		100549
4	ED872589067IN	SP_INLAND_DOC	20	SHUHOOL FOTEDAR	THE METROPOLI-TAN COMMISSION-ER, BANGLORE METROPOLI-TAN REGION DEV AUTHORITY , 560001	47		100549

Sl.No.	Charge Details	Items Count	Amount
1	Base Tariff(incl. VAS)	4	188.00
2	CGST	4	17.00
3	SGST	4	17.00
4	Total Tariff	4	222.00
5	Net Amount	4	222.00

3/12/26, 12:30 PM

Gmail - SERVICE OF NOTICE | NGT Order dated 19.01.2026 in O.A. No. 06 of 2026(SZ) – Shuhool Fotedar & Anr.



Shuhool Fotedar 2.0 <shuhoofotedar10b28@gmail.com>

SERVICE OF NOTICE | NGT Order dated 19.01.2026 in O.A. No. 06 of 2026(SZ) – Shuhool Fotedar & Anr.

1 message

Shuhool Fotedar 2.0 <shuhoofotedar10b28@gmail.com>
To: "chairmankwb@gmail.com" <chairmankwb@gmail.com>

3 February 2026 at 11:23

To,
The Chairman, KUWSDB

Date: 3rd February 2026

Ref: Original Application No. 06 of 2026(SZ) titled Shuhool Fotedar & Anr. Vs. The Chairman, KUWSDB & Ors.

Dear Sir/Madam,

Please find attached the Order dated 19.01.2026 passed by the Hon'ble National Green Tribunal, Southern Zone, Chennai in the above-captioned matter.

The Hon'ble Tribunal was pleased to admit the matter and has directed the issuance of notice to all Respondents.

Compliance: In compliance with the said order for Private Notice, I am hereby serving upon you the soft copy of the Order along with the complete Original Application (Petition).

Note on Hard Copy: Please be informed that the physical hard copy of the Original Application has already been forwarded to your office directly by the NGT Registry during the filing process.

Next Date: The matter is posted for the filing of your reply/hearing on 13.03.2026.

Kindly acknowledge receipt of this email.

Regards,
Shuhool Fotedar
Applicant No. 1 (In Person)

2 attachments

 ngt29JanOrder.pdf
517K

 NGT_Petition_CompleteNew-1.pdf
5053K

3/12/26, 12:31 PM

Gmail - SERVICE OF NOTICE | NGT Order dated 19.01.2026 in O.A. No. 06 of 2026(SZ) – Shuhool Fotedar & Anr.



Shuhool Fotedar 2.0 <shuhoolfotedar10b28@gmail.com>

SERVICE OF NOTICE | NGT Order dated 19.01.2026 in O.A. No. 06 of 2026(SZ) – Shuhool Fotedar & Anr.

1 message

Shuhool Fotedar 2.0 <shuhoolfotedar10b28@gmail.com>
To: Hebbagodi CMC <ka.hebbagodi.cmc@gmail.com>

3 February 2026 at 11:37

To,
The Municipal Commissioner, CMC Hebbagodi

Date: 3rd February 2026

Ref: Original Application No. 06 of 2026(SZ) titled Shuhool Fotedar & Anr. Vs. The Chairman, KUWSDB & Ors.

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3/12/26, 12:31 PM

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Shuhool Fotedar 2.0 <shuhoolfotedar10b28@gmail.com>

SERVICE OF NOTICE | NGT Order dated 19.01.2026 in O.A. No. 06 of 2026(SZ) – Shuhool Fotedar & Anr.

1 message

Shuhool Fotedar 2.0 <shuhoolfotedar10b28@gmail.com>
To: mc.bmrda@ka.gov.in

3 February 2026 at 11:40

To,
The Metropolitan Commissioner, BMRDA

Date: 3rd February 2026

Ref: Original Application No. 06 of 2026(SZ) titled Shuhool Fotedar & Anr. Vs. The Chairman, KUWSDB & Ors.

Dear Sir/Madam,

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Applicant No. 1 (In Person)

2 attachments **ngt29JanOrder.pdf**
517K **NGT_Petition_CompleteNew-1.pdf**
5053K

3/12/26, 12:32 PM

Gmail - SERVICE OF NOTICE | NGT Order dated 19.01.2026 in O.A. No. 06 of 2026(SZ) – Shuhool Fotedar & Anr.



Shuhool Fotedar 2.0 <shuhoolfotedar10b28@gmail.com>

SERVICE OF NOTICE | NGT Order dated 19.01.2026 in O.A. No. 06 of 2026(SZ) – Shuhool Fotedar & Anr.

1 message

Shuhool Fotedar 2.0 <shuhoolfotedar10b28@gmail.com>
To: chairman@kspcb.gov.in

3 February 2026 at 11:43

To,
The Chairman, KSPCB

Date: 3rd February 2026

Ref: Original Application No. 06 of 2026(SZ) titled Shuhool Fotedar & Anr. Vs. The Chairman, KUWSDB & Ors.

Dear Sir/Madam,

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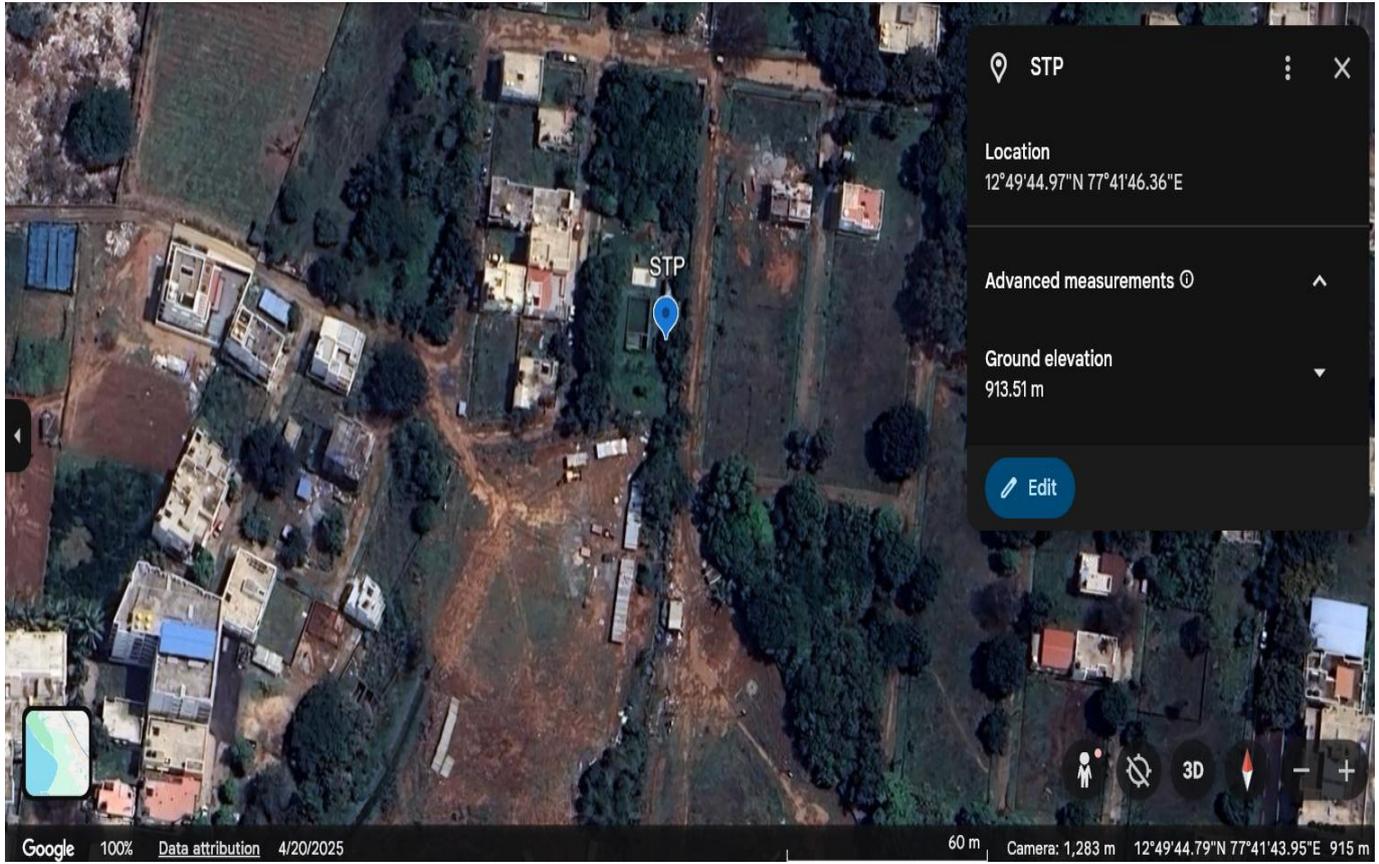
Next Date: The matter is posted for the filing of your reply/hearing on 13.03.2026.

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Applicant No. 1 (In Person)

2 attachments **ngt29JanOrder.pdf**
517K **NGT_Petition_CompleteNew-1.pdf**
5053K

ANNEXURE A-11: Satellite view picture of the semi-functional Sewage Treatment Plant (STP) at Vasundhara Layout.



ANNEXURE A-12: Copy of the letter sent to CMC Hebbagodi by the Vasundhara Residents' Welfare Association (RWA) regarding the STP upgrades.

VASUNDHARA LAYOUT RESIDENTS WELFARE ASSOCIATION

Ref. No.
To,
The Municipal commissioner
CMC.
Hebbagodi,
Hosur Road,
Bengaluru- 560100

Date:
26-03-25

Subject: Request for Confirmation on STP Plan near Vasundhara Layout

Respected Sir,

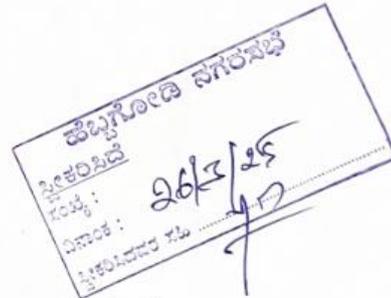
We are currently awaiting confirmation regarding the Sewage Treatment Plant (STP) plan located near Vasundhara Layout. This confirmation is essential for us to proceed with the necessary upgrades to our existing STP.

During our previous discussions with the officials, it was indicated that we would not need to undertake any modifications to our STP due to the proposal for a larger government STP situated nearby. However, we have recently learned through media reports that the government STP proposal has been relocated to a different site.

In light of this new information, we kindly request your confirmation on the STP plan to enable us to move forward with our reworking plans.

Thank you for your support in this regards.

Date: 26-03-25
Place: Bangalore



From

Vasundhara Layout Residents welfare association & Vasundhara Layout Residents
Vasundhara Layout,
Ananth Nagar Phase 3
Bengaluru-560 100

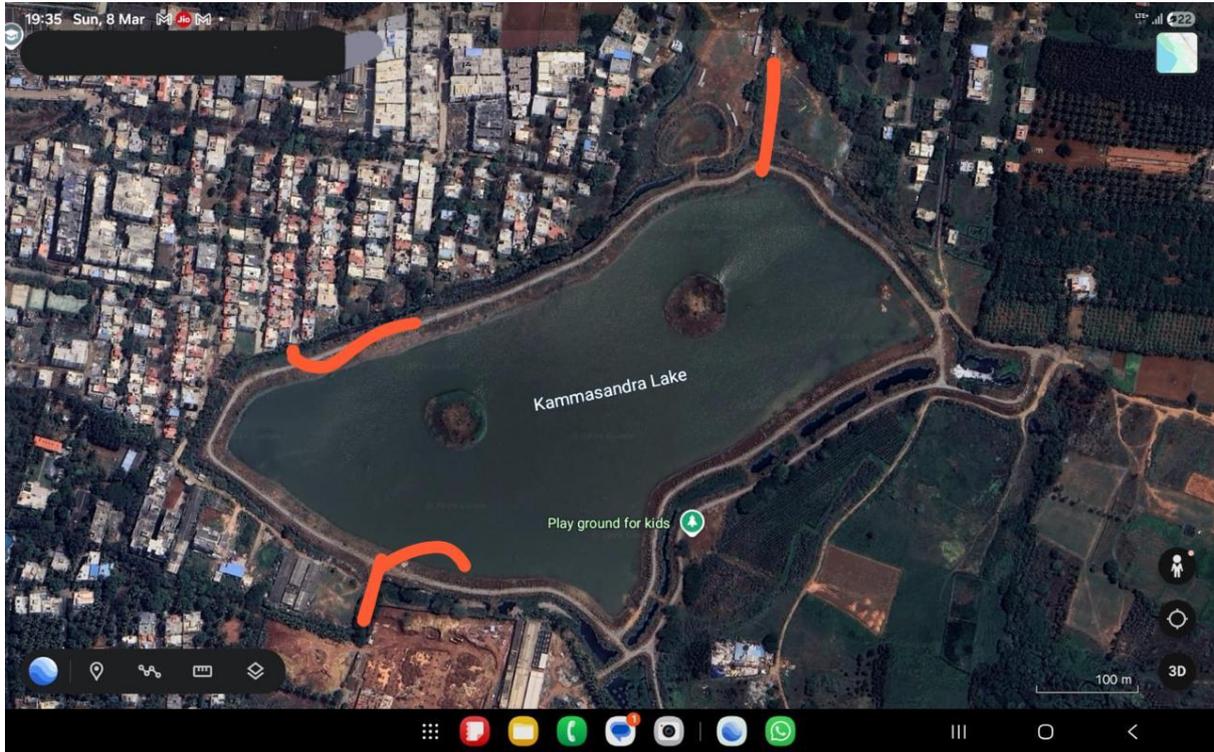
ANNEXURE A-13: Copy of Page No. 10 of the Handbook of Service Level Benchmarking issued by the Ministry of Urban Development, Government of India.

8

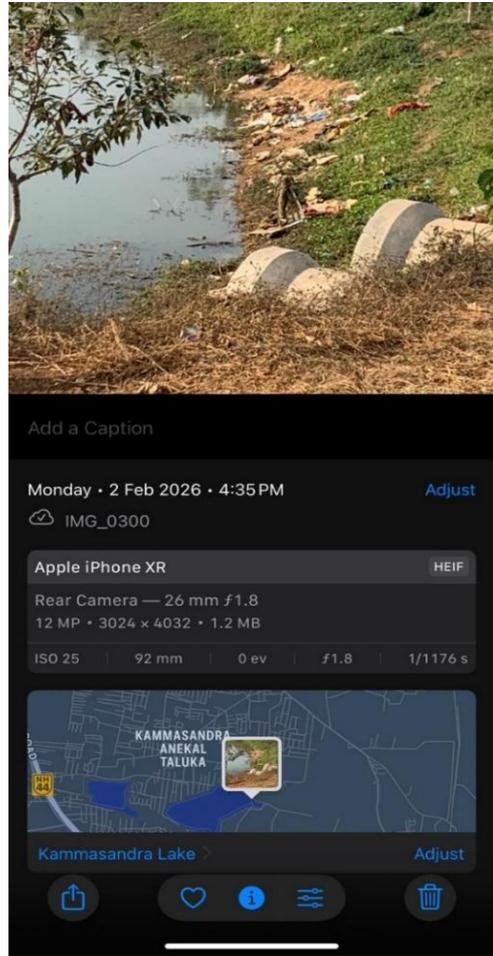
BENCHMARKS AT A GLANCE

2.1 Water Supply Services		
S. No.	Proposed Indicator	Benchmark
2.1.1	Coverage of water supply connections	100%
2.1.2	Per capita supply of water	135 lpcd
2.1.3	Extent of metering of water connections	100%
2.1.4	Extent of non-revenue water (NRW)	20%
2.1.5	Continuity of water supply	24 hours
2.1.6	Quality of water supplied	100%
2.1.7	Efficiency in redressal of customer complaints	80%
2.1.8	Cost recovery in water supply services	100%
2.1.9	Efficiency in collection of water supply-related charges	90%
2.2 Sewage Management (Sewerage and Sanitation)		
S. No.	Proposed Indicator	Benchmark
2.2.1	Coverage of toilets	100%
2.2.2	Coverage of sewage network services	100%
2.2.3	Collection efficiency of the sewage network	100%
2.2.4	Adequacy of sewage treatment capacity	100%
2.2.5	Quality of sewage treatment	100%
2.2.6	Extent of reuse and recycling of sewage	20%
2.2.7	Efficiency in redressal of customer complaints	80%
2.2.8	Extent of cost recovery in sewage management	100%
2.2.9	Efficiency in collection of sewage charges	90%
2.3 Solid Waste Management		
S. No.	Proposed Indicator	Benchmark
2.3.1	Household level coverage of solid waste management services	100%
2.3.2	Efficiency of collection of municipal solid waste	100%
2.3.3	Extent of segregation of municipal solid waste	100%
2.3.4	Extent of municipal solid waste recovered	80%
2.3.5	Extent of scientific disposal of municipal solid waste	100%
2.3.6	Efficiency in redressal of customer complaints	80%
2.3.7	Extent of cost recovery in SWM services	100%
2.3.8	Efficiency in collection of SWM charges	90%
2.4 Storm Water Drainage		
S. No.	Proposed Indicator	Benchmark
2.4.1	Coverage of storm water drainage network	100%
2.4.2	Incidence of water logging/flooding	0

ANNEXURE A-15: Satellite picture of Kammasandra Lake depicting three locations where hazardous sewage water enters the newly constructed drain (Rajakaluves).



ANNEXURE A-16: Photographs of the drain near Kammasandra Lake.



ANNEXURE A-17: Photographic evidence of solid waste and garbage littered along the perimeter and protected buffer zone of Kammasandra Lake.



GPS Map Camera
Bengaluru, Karnataka, India
Phase 2, Bommasandra, Bengaluru, Karnataka 560100, India
Lat 12.823912, Long 77.694180
Monday, 09/03/2026 06:41 PM GMT+05:30
Note : Captured by GPS Map Camera

ANNEXURE A-18: Photographic evidence of water tankers extracting contaminated groundwater from borewells within the Kammasandra Lake buffer zone.



ANNEXURE A-19: Photographic evidence demonstrating ecological fatalities, including dead migratory birds and fish.

