

BEFORE THE NATIONAL GREEN TRIBUNAL  
South Zone Bench at Chennai, T.N.

O.A No. 71 OF 2023 (SZ).

Between:

Human Rights & Consumer Protection Cell Trust – Regd. No. 1/IV/2014  
Represented By its Managing Trustee: -  
Thakur Rajkumar Singh S/o Late Sri. T. Deen Dayal Singh  
Aged about 52 years, Occupation – Managing Trustee – HRCPC Trust  
BHEL MIG 982, Serilingampally, Hyderabad – 502 032, Telangana  
State. Ph. No.: 8885552997, E-mail Id: hrcpctrust@gmail.com

..... Applicant.

AND

1. The State of Telangana  
Rep. by its Chief Secretary  
& 11 Others.

..... Respondents.

**MEMO Filed By the Applicant – For Appointing Expert**

It is most humbly submitted as follows:

1. The 2nd Respondent – HMDA, has filed its report dated 19.07.2025, which was hosted on the Hon'ble NGT website on 17.09.2025. In the said report, the 2nd Respondent has issued a fresh Re-Preliminary Notification No. 613/HMDA/LPC/Sangareddy/Re-PN/Outside ORR/2025 dated 26.06.2025, pertaining to Varrakunta Lake (Lake ID 1000/89), Bollaram Village, Jinnaram Mandal. The report encloses the new FTL and Cadastral Maps forming the basis of this revised notification.
2. Using the Latitude–Longitude (GEO-Points) furnished by the 2nd Respondent at Page 9 of the Report, the Applicant has plotted the said

points on Google Earth imagery. Additionally, the Applicant has marked a Green Triangle on the Survey of India Map and a Red Triangle on Google Earth, taking (i) the two bund-end points of the adjacent lakes on the northern side, and (ii) the central junction of Mallampet–Bachupally–Gandimaisamma X - Roads, as fixed reference anchors on both maps.

3. Upon simple and direct comparison of the physical geo-referenced points, it becomes evident that the natural and historically existing Varrakunta Lake falls squarely within the triangular zone on both SOI and Google Earth imagery, with its bund aligned North–South. However, the 2nd Respondent’s newly indicated lake location in the 2025 Re-Preliminary Notification is situated far outside these triangulated boundaries and depicts the bund as facing North, which is inconsistent with all available physical, satellite, cartographic, and historical records.
4. The report has been jointly prepared by the 2nd Respondent (HMDA) and the 5th Respondent (District Collector). In view of the discrepancies between the scientific/geo-spatial evidence and the revised notification, there is a reasonable possibility that the new Re-Preliminary Notification may have been prepared in a manner that benefits Respondents 10, 11, and 12, whose real-estate venture lies in the Varrakunta lake.

In these circumstances, and in the interest of maintaining the ecological integrity of the water body and ensuring neutrality, it is just and necessary that an

independent, specialised authority be directed to verify the true and correct location and extent of the lake.

Accordingly, the Applicant most respectfully prays that this Hon'ble Tribunal may be pleased to direct the Commissioner, HYDRAA (Hyderabad Deccan Region Area Authority), 7th Floor, Buddha Bhavan, Hussain Sagar, Ranigunj, Secunderabad – 500003 (Email: commissionerhydraa@gmail.com; Ph: 7207923085) – the statutory expert body constituted by the Government of Telangana for the protection of water bodies within the ORR – to conduct an independent verification and submit a report on the correct FTL boundaries, buffer zones, and geographic placement of Varrakunta Lake (Lake ID 1000/89).

Hence this Memo.

Place : Hyderabad  
Date : 25-11-2025



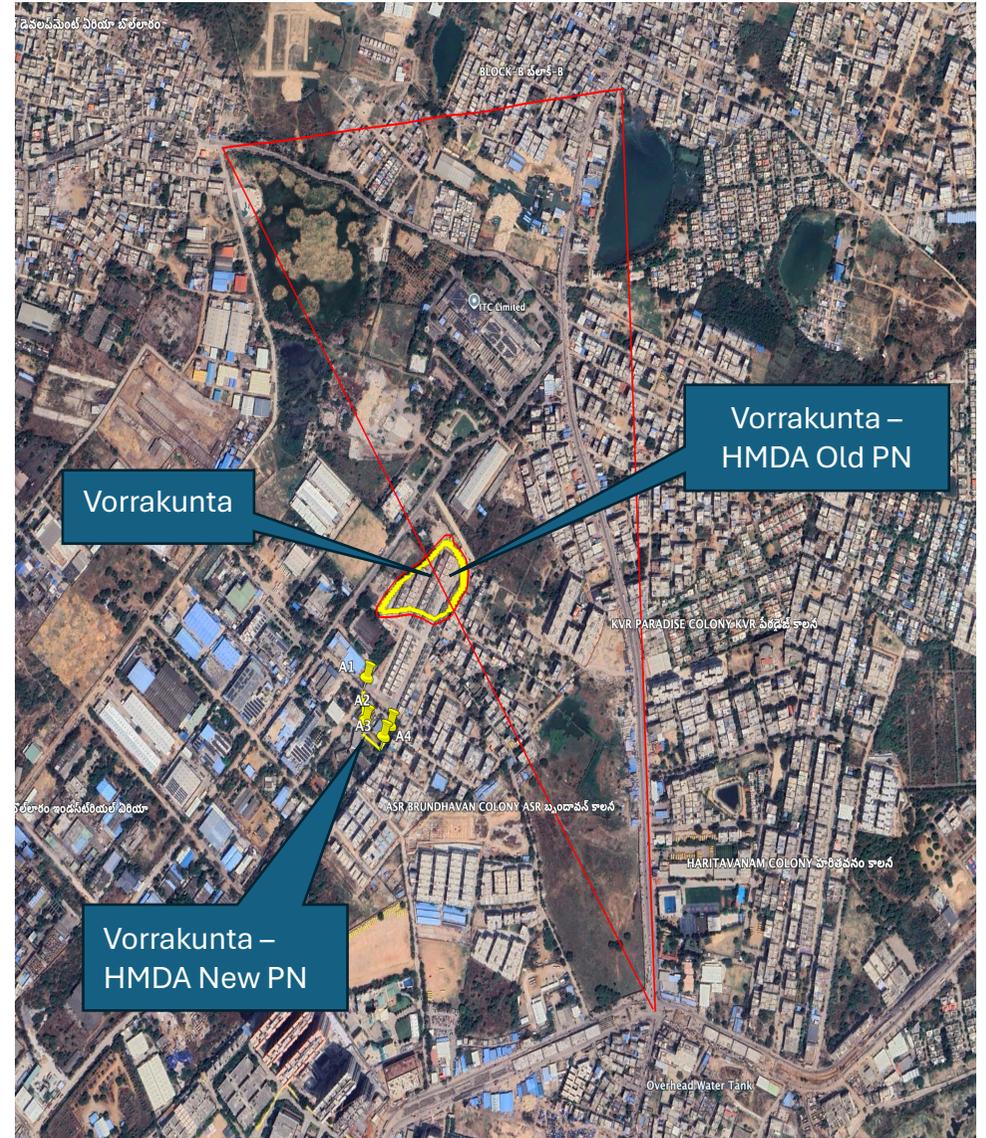
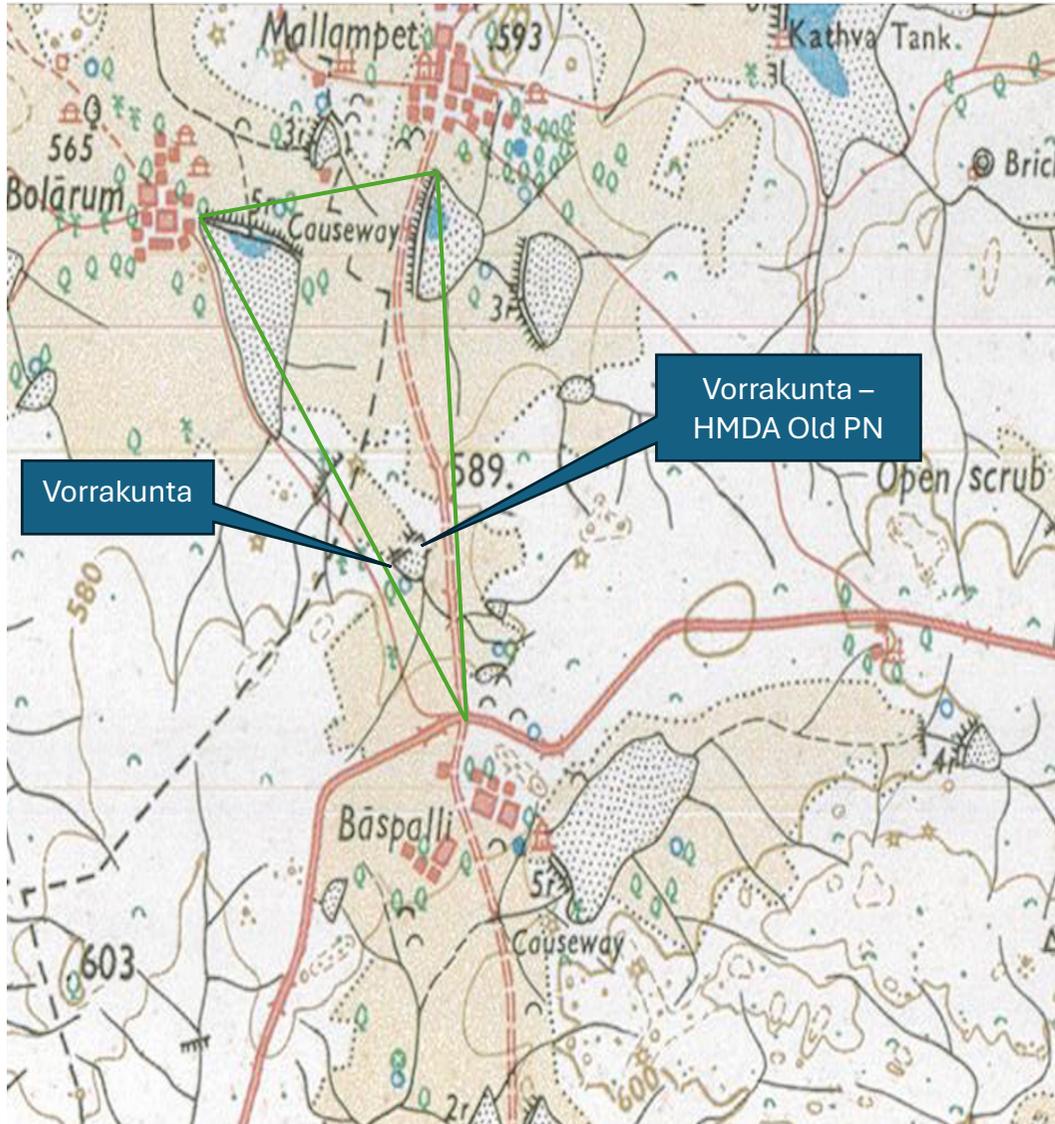
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**Enclosures :**

S.No.	Date of Document	Document Details	Page Nos.
1.	25-11-2025	Photographic comparison of the Survey of India Map and Google Earth imagery, marking the original position of Varrakunta Lake vis-à-vis the new location projected in the HMDA's Re-Preliminary Notification.	1

# Location Of Vorrakunta 1000/89 – Bollaram Village, Sangareddy District, Telangana.

Location of Vorrakunta in SOI [Between Green Triangle] & Google Earth Image [Between Red Triangle]



The New HMDA Preliminary Location is being shown far away from the SOI location.

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**Applicant – For**  
**Appointment of Expert.**

Date of Filing : 25-11-2025.

Filed By : Applicant [Party-In-Person]

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