

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

O.A NO. 737 of 2022

I.A NO. 93 of 2023

IN THE MATTER OF:

Amit Aggarwal, ARWSApplicant

Versus

Delhi Development Authority & Ors.Respondent

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APPLICANT

Through

GARIMA KUMAR

Advocate

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PLACE: DELHI

DATE: 14.09.2024

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O.A NO. 737 of 2022

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IN THE MATTER OF:

Amit Aggarwal, ARWSApplicant

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**OBJECTIONS ON BEHALF OF THE APPLICANT TO THE REPLY/
REPORTS FILED BY RESPONDENTS 1-6 IN O.A NO. 737 OF 2022 & I.A
NO. 93 OF 2023.**

MOST RESPECTFULLY SHOWETH:

1. That the above-captioned Application is preferred before this Hon'ble Tribunal reporting the reckless decades-long Depletion of Smriti Van (Reserved Forest Area) part of South Central Ridge Area due to Breach of Professional Duty of Care by way of cultural programs and setting up of dysfunctional STP voluntarily & arbitrarily polluting the natural water body (Macchli Talab) present at the Pristine Green Area, Smriti Van.
2. That the Hon'ble Tribunal vide order dated 08.07.2024 granted the Applicant to file the objections, if any, to the facts disclosed in the reports of the Respondents.
3. That the Applicant at this stage, is filing objections based on the Reports and replies filed till date, while most humbly reserving the liberty to file

more detailed response/objections, if any, in future, should it become necessary.

I. GROUNDS FOR OBJECTIONS/ SUBMISSIONS:

1. That attention on advisory by NGT to CPCB and CAQM is crucial wherein the Hon'ble Tribunal has asked them to explain the reasons for ozone levels exceeding the parameters. It is worth pointing out that R.K Puram is one of the seven hotspots of pollution and SCRA is part of it.
2. That the light of submission of fact/objection is highly crucial at this stage of the matter concerning **STP**;
 - (i) DJB has an existing defunct old STP meant for Sec A Pocket B&C, Vasant Kunj, adjoining Smriti Van but outside the boundary of the same. Concerning the STP in issue, Instead of using the site DDA/DJB installed an illegal STP (**refer Page 150 Item 2 Para (ii) of PCCF Report Annexure-C**) inside the reserve forest area. This is also more or less defunct and under-capacity (**as per Page no. 474 of latest DPCC report dated 04.09.2024**).
 - (ii) This defunct STP is releasing untreated sewage from non-conforming adjoining houses built on SCRA, as per **drawing of SCRA boundary of PCCF Report Annexure-A**.
 - (iii) Previously only open drain water (not sewage) was coming via kuccha drain filtered and oxygenated naturally before reaching the lake. This can be confirmed from the representatives of agencies viz Wetland Authority and Vedic Srijan who surveyed the water body on behest of DDA before installation of STP.

- (iv) After installation of illegal STP and cemented covered drain, without approval from Competent Authority i.e. RMB and CEC, authorities' viz. DDA/DJB/MCD connected the sewage from adjoining houses built on SCRA Govt. lands with the cemented drain. A tweet was forwarded by the Applicant addressing DDA/ DJB on 27.02.2022 to abstain from the activity, but was simply ignored by the professional breachers of law. Same was shared with Mr. Ankit Srivastava, consultant appointed by Delhi Govt. for rejuvenation of water bodies on his Whatsapp mobile no. 096500 50352, but he also ignored the serious matter for the reason known to them.
- A copy of the tweet and Whatsapp intimation in this regard is annexed herein under as ANNEXURE-A(i) & ANNEXURE-A(ii).**

3. That the light of submission of fact/objection is highly crucial at this stage of the matter concerning **Water body (Machhli Talab)**;
- (i) As the name clearly signifies that the lake was once full of aquatic life since DDA had let it out to a contractor, which can be can be ascertained from DDA records, or even otherwise. It has historically acted as a reservoir and could absorb storm water runoff minimizing its impact on surrounding areas. Due to non-functional STP, the water started overflowing daily, transforming it into unhealthy water body. The reasons for lake being unhealthy are given below:
- (a) Catchment area marginalized due to raised level of drain, cordoning off the lake and restricting storm water runoff.
- (b) Since 2015 till 2022 Chhath Ghat reservoir was prepared during winter while restrictions as per GRAP

was in force, using JCB for aggressive excavation. It was then filled with water brought by DJB tankers and reservoir put in place with the help of a bund. During the festivities Pooja was observed sprinkling sindoor and Pooja samagri in the water. After the end of festivities the bund was removed and unchecked polluted water diverted to the lake and everywhere it can flow all over the soil of Smriti Van.

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- (ii) Further illegal car market is being run on the PWD drain containing oil and other chemicals. During rains the spillage of the catchment finds its way to the lake via Ambience Tower lane / Kishangarh Road.
 - (iii) Storm water mixed with sewage find unrestricted entry into the lake from Kishangarh and other DDA colonies.
 - (iv) Dredging has never been carried out in the lake for removal of extraneous material.
4. That the light of submission of fact/objection is highly crucial at this stage of the matter that the exercise carried out for treatment of water has been reduced to naught because of installation of under capacity STP, with the result untreated water got mixed with treated water at the inlet of lake.
5. That the light of submission of fact/objection is highly crucial at this stage of the matter that **there is no demarcation between storm water and sewage drain.** This is from the main causes of damage to aquatic life defeating the very purpose for which STP was installed. The corrective action now is Removal of under-capacity STP & cemented 2 mtr. wide drain, freeing space of 3700 sq. mtr. of forest land i.e. approx. 370 more

trees. **Real time monitoring system needs to be integrated for an effective lake management and to reduce ozone level.**

6. That the light of additional submission of fact/objection is highly crucial at this stage of the matter wherein it will not be out of place to mention that a new STP with latest technology is in the advance planning stage to revive the defunct STP adjoining Smriti Van on behest of DJB Vice Chairman Mr. Somnath Bharti. His high powered team paid a visit to the site in May 2023 and visualized a high capacity STP treating sewage water from Sector A and Kishangarh routed to Mehrauli treatment plant via open drains crossing South Central ridge. **ANNEXURE-B**

7. That the light of submission of fact/objection is highly crucial at this stage of the matter concerning Smriti Van that Besides causing damage to the lake, the organizers of Chhath /Ramleela/Dussehra Mela caused permanent **loss to the biodiversity**. In reply to a RTI, DDA Horticulture department has stated vide their letter dated 11.08.2020 that 2450 no of trees were planted in the said area over a period of five years most of them have gone missing as on today.

A copy of reply has is annexed herein under as ANNEXURE-C.

8. That the light of submission of fact/objection is highly crucial at this stage of the matter as it has caused irreparable **loss to the environment** due to unrestricted use of diesel generators (in absence of temporary electric meter connection) run even at time when GRAP was in force. It was the violation of Forest (Conservation) Act 1980 whereby all activities are to be carried out from Sunrise to Sun set and there is a complete ban on electric lamps and playing of sound/DJ. It will be also pertinent to note that no such permission was granted in 2018-19 by DDA but Police allegedly helped

the organizers for the conduct of function. **(Refer to Page 29 Annexure A-4 sub Para 4).**

9. That the light of submission of fact/objection is highly crucial at this stage of the matter that as a matter of fact, not only the organizers but the Police licensing authority erred in granting permission without giving cognizance to the fact that the subject site was actually a forest and GRAP was in force. Further Police refrained from complying with DDA (Horticulture) Request time to time even after repeated reminders. They were rather instrumental in getting the show organized and conducted under their protection.
10. That the light of submission of fact/objection is highly crucial at this stage of the matter to mention that incongruity has crept in Govt. map of Smriti Van wherein boundary of SCRA has been incorrectly depicted from Point 171 to 183. This is what we have noticed and there might be more aberrations. This calls for a concerted action bringing the map in conformance to the MPD 1962, 2001, previous boundaries of DDA's regional park AND Forest notification of 24th May, 1994.
11. That the light of submission of fact/objection is highly crucial at this stage of the matter concerning SCRA boundary, it has been said that SCRA area is 626 Hectare including built up area of Mehrauli/part of Kishangarh i.e. approx. 108 hectare as per current Google map. This leaves a net area of 518 hectare of green area available for plantation.
12. That the light of submission of fact/objection is highly crucial at this stage of the matter that if we take the figure of 626 hectare of SCRA as correct,

this short fall of 108 hectares has to be accounted for, by including the un-built /afforest-able area which have not been included as of now. ANNEXURE- D.

13. That the light of submission of fact/objection is highly crucial at this stage of the matter wherein it is highly ironical that Smriti Van of 37/34.51 acres (14 hectare) has been damaged by act of man which otherwise should have been a lush green forest having more than 8000 fully grown trees apart from shrub and vegetation.
14. That the light of submission of fact/objection is highly crucial at this stage of the matter concerning Smriti Van (Reserved Forest of SCRA) that tree felling is a grave offence against environment and the Hon'ble NGT has to intervene from time to time to safeguard the health of public. In a latest reference DDA/LG were alleged to be responsible for giving permission for cutting of 1400 trees in Southern ridge as per the orders of Hon'ble Supreme Court of India.
15. That the light of submission of fact/objection is highly crucial at this stage of the matter in the present case under reference DDA omitted to carry out plantation in Smriti Van (reserve forest area) when it was the most required causing gross aberrations to environment vis-a-vis the felled/depleted trees which gave fruitful service to the society for the period they were alive.

II. OBJECTIONS/ SUBMISSIONS BY THE APPLICANT:

1. That the contents of the Original Application No.737 of 2022 and I.A No. 93 of 2023, along with the annexures may be read as part and parcel of this Objection and are not repeated here for the sake of brevity and to avoid repetition.

2. That on page 140 as per para 4 and 5 in the Report of DPCC, an inspection was conducted on 13.12.2022 by the office of the South Forest Division, Department of Forest and Wildlife, GNCTD, states no violation was made which contradicts its own described report established on page 144 para 15 sub para (ii) and (iii).

3. That the light of submission is to be put on Page 141 sub para 2 & 3 in the Report of DPCC, concerning water body & STP, stating;

“This water body is used for discharge of waste water coming from residential areas like Mehrauli & Kishangarh, creating hazardous situations for flora and fauna inside water body and also give rise to water- borne diseases.”

“ A sewage treatment plant has been found during site visit in Smriti Van. No prior approval has been obtained from the Central Government for construction of this plant”

Substantially clarifies the status and condition of the water body present at Smriti Van.

4. That the light of submission of fact is to be put on Page 144 Para 15 Sub para (ii) & (iii) Report of DPCC stating;

“(ii).He has agreed to remove the base concrete of the pond and maintain the existing natural pond to be utilized by the flora and fauna of South Central Ridge.

(iii). Representatives of DDA also agreed to remove all interlocking tiles and use only perforated tiles without using any cement to create eco-friendly amenities in the area.”

Substantially clarifies negligence of the concerned authorities towards the preservation of the Reserved Forest Area (Smriti Van) by incorporating interlocking tiles, Concrete Pond etc. at the green forest area. Which suddenly contradicts the report of inspection made on page 140 in para 4.

5. That the light of submission of fact/ objection is to be put on Page 355 para 3 sub para 3.1.4 & 3.1.5 clearly holds DDA responsible for the land, including water bodies/lakes. Henceforth, in a humble submission, it is prayed that the concerned officers responsible for heinous negligence should be traced as per their posting and organizations, held liable for the grave damage to the important part of SCRA (South Central Ridge Area), and fined accordingly.

6. That the light of submission of fact/objection is to be put on Page 356 para 3.2.5 concerning water testing by DJB & DDA:

“To monitor quality of water in the lakes/water bodies on regular basis at least eight times a year, communicate the quality data to DDA and to undertake appropriate action in order to improve the water quality wherever necessary through in-situ bioremediation/ phytoremediation or any other suitable methodology.”

Substantially clarifies negligence of the concerned authorities towards the preservation of the Reserved Forest Area (Smriti Van) by clearly staying limited to getting into the MoU voluntarily only for the Depletion and Encroachment reasons as no benefit is being done to either the water body or the Smriti Van at large.

7. That the light of submission of fact/objection is to be put on Page 356 para 3.2.6 in Report of R-1 DDA regarding cleaning of water-body dredging, stating;

“To carry out physical cleaning of the water bodies/lakes, whenever required and collect/dispose the solid & plastic waste to designated site away from the Water body/lake.”

Are crucial responsibilities not fulfilled by the Respondent.

8. That the light of submission of fact/objection is to be put on Page 356 para 4 in Report of R-1 DDA concerning minutes of the meeting, stating;

“PROJECT MANAGEMENT:

A joint committee of members from the DDA & DJB will be formed to monitor the progress/target achievement and sort out the routine matters related to the site. This committee will meet at least once in every quarter and note its minutes for further reference.”

The records of which are missing on the part of the Respondent.

9. That the light of submission of fact/objection is to be put on Page 357 para 7 stating the list of Concerned authorized persons along with their roles;

“AUTHORIZED CONTACT PERSONS:

There will be at all the times one nominated contact person from each party who will have the obligation to advise all involved parties immediately of any changes. Authorized contact persons are:

From DDA:

Sh. Subhasish Panda, Vice-Chairman, DDA Address: Ist Floor, B-Block Vikas Sadan, INA, New Delhi-110023. E-mail: vcdda@dda.org.in

From DJB:

*Sh. P. Krishnamurthy, Chief Executive Officer, DJB
Address: Delhi Jal Board, Varunalaya Phase-I, Karol Bagh, New Delhi- 110005 Email id: ceodelhLdjb@nic.in”*

10. That the light of submission of fact/objection is to be put on Page 358 sub-para (iv) stating the time period for resolution;
- “iv. The committee shall analyze its decision within 3 months after having received the reference/notice in writing regarding the dispute from the concerned aggrieved party.”*
11. That the light of submission of fact/objection in the favor of the Applicant is to be put on Page 368 para (e) date 05.10.2023 STP dysfunctional as on 25.01.2024, as per the reports of PCCF.
- (i) The Reports of APCCF also states that the dysfunctional STP continues to discharge untreated water into Macchli Talab, adversely impacting the ecosystem.
- (ii) The report also states that the issues include foul smell. Black watercolor, and odor in machli talab.
- (iii) Clear Separation of storm-water drain and sewer lines has not been implemented.
12. That the light of submission of fact/objection is to be put on Page 370 a letter vide dated 06.10.2023 to DDA requesting joint inspection by Dy. Conservator of Forest.
13. That the light of submission of fact/objection is to be put on Page 137 (ANNEXURE R-3), in the counter affidavit filed by R-1/DDA, crucial to point out the fact wherein the orders of Supreme Court is for parks and not forests.

- 13.1** That as per the first Report of PCCF stating Defunct STP seen with stinking lake in 2022, followed by DPCC/ DDA Report of January'24 same situation was reported . Whereas in July 2024 DPCC reported working STP without proper test Reports of Inflows and Outflows etc.
- (i) However, as a matter of surprising contradiction it is important to note that in the Annexed letter from DJB in the same Report of DPCC, DJB claimed Annual maintenance of STP due to which the STP was shut down-for Annual Maintenance.
 - (ii) The matter of concern that DJB has no vigilance over the STP and is more focused on whitewashing and unreasonable excuses.
 - (iii) Which Annual Maintenance goes on for 2 long years that requires the STP to shut down and remain defunct?
- 13.2** That the light of attention is crucial to be put upon the fact that an under-capacity STP was commissioned in 2021-2022 and remained non-functional till July-2024. A newly established Treatment Plant defunct and closed for years is really very painful.
- 13.3** That the light of attention is crucial to be put upon the fact that Annual Maintenance of a defunct STP is nothing but only a tactic to gain undue time and legitimizing release of untreated sewage in the lake.

14. That the light of submission of fact/objection is to be put on Page 140 para 3 in the Reply of R-2 clearly stating the status of Smriti Van as Reserved Forest Area;

*“ 3. That Smriti van is a part of South Central Ridge notified under section 4 of IFA, 1927, as Reserve Forest, which is under the ownership of Delhi Development Authority (DDA). Map South Central Ridge showing Smriti Van and copy of the notification is annexed as **Annexure-A and B respectively.**”*

15. That the light of submission of fact/objection is to be put on Page 140 para 5, Forest wrongly stated, no offence under DPTA, 1994 were detected on chhath ghat, in Smriti Van, Contradicting its own facts and findings of Smriti van being a reserved Forest. Supporting images of temporary chatt ghat were annexed in the O.A no. 737/2022 and I.A No. 93/2023, and not repeated herein for the sake of brevity.

16. That the light of submission of fact/objection is to be put on Page 170 para (iii) stating Restriction on the de-reservation of forests or use of forest land for non-forest purpose:

Notwithstanding anything contained in any other law for the time being in force in a State, no State Government or other authority shall make, except with the prior approval of the Central Government, any order directing - ;

“ (iii) that any forest land or any portion thereof may be assigned by way of lease or otherwise to any private person or to any authority, corporation, agency or any other organization not owned, managed or controlled by Government;”

Is clearly a breach of law.

17. That the light of submission of fact/objection is to be put along with the relevant data for the No. of trees required to be planted at the Reserved Forest/Forest:
- 1) **FULL HEIGHT TREE (Outer area) of the Reserved Forest/Forest- 400 Trees per Acre***
 - 2) **MIDDLE LEVEL TREE (Middle area) of the Reserved Forest/Forest- 800 Trees per acre**
 - 3) **SHRUBS & OTHER VEGETATIONS (Inner area) of the Reserved Forest/Forest-1200 Trees per acre**
- *4000 sqm=1 acre**
18. That the light of submission of fact/objection is to be put as per the Reports and estimates of PCCF 1500 trees at Smriti Van are old.
19. That the light of submission of fact/objection is to be put as per the records in O.A No. 737/2022 and I.A no. 93/2023 as well as the reports and replies of the Respondents containing factual data that the **Total available area for Plantation at Smriti Van** is 21 acres out of 34.51/ 37 acres, wherein if we spare 5% of the area for other purposes the area comes down to **20 acres** approx.
20. That the light of submission of fact/objection is to be put on **Calculations essential for estimating the total environmental loss and loss to the quality of life & air at large economically** :
- FULL HEIGHT TREE** (Full trees)= 400 x 20 acres = 8000 Trees
- MIDDLE LEVEL TREE** (Small Trees)= 800 x 20 acres = 16000 Trees
- Total Trees = 24000 Trees and more are supposed to be accommodated and planted at Smriti van.
21. That the light of submission of fact/objection is to be put as per the Calculations that:

Out of 8000 Full Height Trees, deducting 1500 Trees (Old Trees which are currently at Smriti Van as per the reports of PCCF) the final required No. of trees are **6500 approx.**

22. That the light of submission of fact/objection is to be put on Calculating the Age of Trees and the losses borne by the Society/City/Environment at large.

- (i) DDA was notified in 1992;
- (ii) A tree takes 10 years to develop fully, according to the fact, the Reserved Forest Area should have been lush Green and full by 2002, which was not the real picture.
- (iii) As per the Inspection by Forest (PCCF) on page 143 para 11, on 13.12.2022, which is 20 years from 2002 and 30 years seeking back from 1992, stating;

“Further it was noticed during inspection dated 13.12.2022 that no compensatory plantation has been found to be done in Smriti Van, Sector –A, Vasant Kunj”

23. That the light of submission of fact/objection is highly crucial at this stage of the matter, as per the price fixed by the Supreme Court Committee for a full tree is Rs. 74,500/- per year .

24. That it is **essential to bring on order The estimated environmental Loss** for 1 Tree in these 20 years of 0 development and care at Smriti van = 20 x 74,500 = **Rs. 14,90,000/- per tree for 20 years.**

25. That it is essential and is henceforth humbly prayed before the Court to **bring on order the total environmental and economic loss to the city’s Smriti van part of SCRA:**

Rs. 14,90,000/- per Tree loss for 20 years x **6500** Trees still required and missing from Smriti van as per calculations done on Para no. 21.

Equals total loss = Rs. 9,685,000,000/- (Rs. 9.6 billion total environmental loss and loss to quality of human life in Delhi, only due to miscarriage of vigilance of responsibility and loyal duty of the concerned officers/authorities).**

****the estimate is only for the minimum value calculated, to calculate the precise grave loss, expert level Committee of the concerned authorities along with the Applicant & one Authorized person of the Applicant under the Hon'ble Judgeship of the NGT is prayed to be executed.**

- 26.** That it is essential and is henceforth humbly prayed before the Court to **bring on order the total environmental and economic loss to the city's Smriti van part of SCRA that is about Rs. 9.6 Billion.**
- 27.** That it is furthermore essential and is henceforth humbly prayed before the Hon'ble National Green Tribunal to **bring on order/record the total environmental and economic loss (Per Year) to the city's Smriti van part of SCRA:**
- (i)** Rs. 74,500/- x 6500 Trees = 48 Crores per Year
= 4 Crores per Month, 13 lakhs per Day
- 28.** That it is furthermore essential and is henceforth humbly prayed before the Hon'ble National Green Tribunal to call for the Records/Diaries/Record Books of DDA and other Respondents so that the actual data, names of officers responsible for grave negligence and disastrous environmental deficit, Minutes of Meetings, and per day action taken in this regard can be recovered before the Hon'ble Tribunal.

29. That the light of submission of facts/objections above-mentioned are highly crucial at this stage of the matter to prevent miscarriage of justice with regards to the negligence caused to the lungs of full metropolitan city of Delhi by the irresponsible acts of officers in charge.

PRAYER

In light of the above submissions, it is most respectfully and humbly prayed that this Hon'ble Tribunal may be pleased to:

- A. Bring on Record the Objections submitted by the applicant.
- B. Bring on Record the Total Environmental and economic loss caused to the lungs of City of Delhi i.e **Rs. 9.6 billion (Rs. 9,685,000,000/-)**
- C. Call for records/ minutes of meetings/ diaries of the Respondents for the sake of transparency.
- D. The estimated loss of 9.6 Billion rupees is minimum calculated value. The tally will surely be higher if other factors are taken into account considering loss to pristine biodiversity at Smriti Van (SCRA). It is requested that an expert Committee under the Hon'ble Judgeship of the NGT, other learned authorities and the Applicant / petitioner, Advocate for the Applicant/Petitioner & the expert person authorized by applicant (details/qualifications of expert person can be furnished before the court, with due leave of the Hon'ble court) be constituted and authorized to assess the loss. Once the report is submitted, the Applicant may be given an opportunity to share his view point for its enforcement.
- E. It is most humbly prayed and submitted before this Hon'ble court that the *Ad populum fallacy*/ bandwagon fallacy that Smriti Van is a park should be removed with public awareness (signboards displayed at entrance and prominent places), restricting Non-forestry activities and restoring its status as a Reserve Forest.
- F. Pass any other order that the court may deem fit and just in the interest of justice and environmental protection.

Through

Garima APPLICANT
GARIMA KUMAR
Advocate

Enrl. No. D/2443/2020
Ch. No. 410, New Lawyers' Chambers
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Mob. : 8929804746 9821711678

(GARIMA KUMAR)

ADVOCATE FOR THE APPLICANT

PLACE: DELHI

(M) 8929804746, 9821711678

DATE: 14.09.2024

Singhgk1997@gmail.com

VERIFICATION

I, Amit Aggarwal, S/o Sh. R.L Aggarwal aged 56 years, Applicant, ARWS, Sector- 'A' Pocket 'B' and 'C', Vasant Kunj, New Delhi- 110070, do hereby verify that the contents of the above facts covered in Objections and Submissions from S. No. 1- 29 are true to the best of my knowledge and the grounds covered therein are based on legal documents-properties and that there is no suppression of any material fact.

DATE: 14.09.2024

PLACE: DELHI



APPLICANT

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

O.A NO. 737 of 2022

I.A NO. 93 of 2023

IN THE MATTER OF:

Amit Aggarwal, ARWSApplicant

Versus

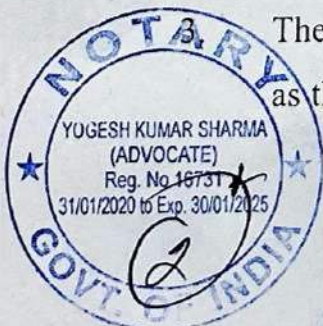
Delhi Development Authority & Ors.Respondent

AFFIDAVIT

I, Amit Aggarwal, S/o Sh. R.L Aggarwal, aged 56 years, Applicant, authorized by ARWS, Sector-A Pocket B and c Vasant Kunj, New Delhi- 110070, do hereby solemnly affirm on oath and declare as under:

1. That I am the Applicant in the Captioned Application and conversant with the facts and circumstances of the present case and hence I am competent to swear the present affidavit.
2. That the Accompanying Objections/submissions of facts has been drafted as per my suggestions and satisfaction and is based on the records obtained from public domain and personal information of the Applicant. I have fully gone through and understood the contents therein.

The contents of the present rejoinder may be read as part of this affidavit as the same are not being repeated herein for the sake of brevity.



DEPONENT

VERIFICATION

Verified at New Delhi on this **19 SEP 2024** day of September 2024. I, the above named Deponent, do hereby, solemnly affirm and declare that the contents of paragraphs 1 to 3 of this affidavit are true and correct to my knowledge as derived from the information available from Public domain and nothing material has been concealed therefrom.



Anil Aggarwal

DEPONENT

Garima
GARIMA KUMAR
Advocate

Enrl. No. D/2443/2020
Ch. No. 410, New Lawyers' Chambers
Patiala House Courts, New Delhi-110001
Mob. : 8929804746 9821711678

I identified the deponent who has signed in my presence

CERTIFIED THAT DEPONENT has solemnly affirmed before me that the contents of the above which have been read & explained to him are true and correct to his knowledge.

Yogesh Kumar Sharma
YOGESH KUMAR SHARMA
Notary Public
Delhi

19 SEP 2024

← Post



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Follow

@DelhiJalBoard A natural way of treating waste water! Funny, gross misuse of public funds, huge civil structures that too in the south central ridge of @official_dda samriti van vasant kunj. Really very shameful. @uditprakash please intervene. Very painful.



18:05 · 27 Feb 22

1 Quote



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15 January 2022

Messages and calls are end-to-end encrypted. No one outside of this chat, not even WhatsApp, can read or listen to them. Tap to learn more.

Hello Ankit ji
We need to discuss urgently about water body in smriti van vasant kunj. Probably over the years many civil engineers had raped this ridge land along with your delhi govt's chhat puja and idol immersion program. Please help this beautiful land from becoming a sewage treatment plant with drains and chambers all over visible.
Thanks and regards
Amit Aggarwal
President ARWS
Sector A/B&C Vasant Kunj
& Project head, URJA

11:18 ✓✓

20 January 2022

Hello Ankit
Hope you are doing well and your dear one has recovered.
Please connect whenever you are free.
Regards

14:42 ✓✓

2 March 2022



GATI on Twitter
"@DelhiJalBoard A natural way of tre...
twitter.com

<https://twitter.com/GATI32505622/status/1497913168227491844?t=9I78YfkVR3Btm4dknmkGAw&s=08>

13:54 ✓✓

20 February 2024

Your security code with Ankit Srivastava Water Bodies changed. Tap to learn more.

23 February 2024

Your security code with Ankit Srivastava Water Bodies changed. Tap to learn more.

12 March 2024

Your security code with Ankit Srivastava Water Bodies changed. Tap to learn more.

8 April 2024

File No: Pr.11012/1/2024-O/o Dir (T-III) NMCG

भारत सरकार
जल शक्ति मंत्रालय
जल संसाधन, नदी विकास एवं गंगा संरक्षण विभाग
राष्ट्रीय स्वच्छ गंगा मिशन

पहली मंजिल, मेजर ध्यान चंद नेशनल स्टेडियम,
निकट इंडिया गेट, नई दिल्ली - 110001,
दिनांक: 05th जुलाई, 2024

सेवा में,

Dr Kapil Sharma,
National Institute of Technology, Delhi,
A-7, Institutional Area,
Near SRHC Hospital Narela,
Delhi-110040 (Email: kapilkumar@nitdelhi.ac.in)

Subject: DPR for "Construction of 1 MGD STP alongwith other associated/allied works at Sector-A Vasant Kunj to feed Treated water to the Shamsi Talab in Mehrauli, Delhi through laying of line between the proposed DSTP and Shamsi Talab alongwith 15 years O&M i/c two years Defect Liability Period (DLP)" for consideration under Namami Gange Programme.

Sir,

This has reference to TPA appraisal received from NIT Delhi for the subject proposal vide Email dated 13.06.24, for a verified cost of Rs. 38,73,11,318.85 including 15 years O&M.

Subsequently, it was noticed that the appraised cost is for 5 MLD requiring further interpolation to 4.54 MLD. The matter was discussed with concerned DJB officials at NMCG Office on 14.06.24 for submission of revised cost, as required. DJB has accordingly revised the cost on 19.06.24 to Rs. 35,83,47,827.22 (Annexed) with 15 years O&M i/c 2 years DLP.

Therefore, thus revised cost is being sent to yourself, for your comments please.

This issue with the approval of competent authority.

Yours faithfully,

Annexure: As above

Pravir
05.07.24
(डॉ. प्रवीण कुमार)
Director (T), NMCG

Copy to: -

1. The Chief Engineer (WB), Delhi Jal Board, Room No. 113, Varunalaya Phase-II, Karol Bagh, New Delhi-110005

Internal Circulation: -

PS to (DG)/ED (Projects), NMCG.

Summary of cost for the project "Construction of 01 MGD Sewage Treatment Plant along with other associated / allied works at Sector-A Vasant Kunj to feed treated water to the Shamshi Talab in Mehrauli through laying of line between the proposed DSTP and Shamshi Talab, Delhi, along with Five years Operation & Maintenance Including two years Defect Liability Period."

(Amount in Rs.)

S. No.	Items	Quantities	Approved Cost	Remarks
A	Basic capital Cost			
1	Civil work for STP	Estimated cost	38180650.09	(Cost included GST/1.12) for 1 MGD i.e 4.54 MLD
2	Civil work for disposal line	Estimated cost	3852076.50	(Cost included GST/1.12) for 1 MGD i.e 4.54 MLD
3	Mechanical works	Estimated cost	57076239.10	(Cost included GST/1.12) for 1 MGD i.e 4.54 MLD
4	Electrical works	Estimated cost	13809487.46	(Cost included GST/1.12) for 1 MGD i.e 4.54 MLD
5	Instrument works	Estimated cost	8103049.12	(Cost included GST/1.12) for 1 MGD i.e 4.54 MLD
	Total CAPEX		121021502.27	
	Sub Total (A) : Basic Capital Cost		121021502.27	
B	Centage (applicable on basic capital cost)			
B1	Cost of project preparation @ 4% (maximum) of basic capital cost		4840860.09	A maximum 4% each of AA&ES basic capital cost/ awarded capital cost (whichever is lower) is admissible towards (a) DPR preparation and (b) supervision fees. However, payments for DPR preparation and supervision fees to Executing Agencies (EAs)/ Consultants are to be made as per actuals based on the scrutiny of supporting documents furnished by them for such claims (Reference: NMCG circular No. No. G-35/10/2020 - BUDGET NMCG dated 19.01.2023)
B2	Cost of project supervision @ 4% (maximum) of basic capital cost		4840860.09	
	Sub Total B - Centage		9681720.18	
C	Q&M cost for 1st 15 years, excluding power charges including 2 years DLP		138811078.88	Admissible components include costs towards Manpower, Maintenance, Chemicals etc
			138811078.88	
D	Power charges for 1st 15 years		37896591.94	To be reimbursed on actual basis by NMCG.
			37896591.94	
E	Other work components (without GST)			
E1	Land acquisition		0.00	To be met by State Govt.

E2	Utility shifting @ 2% of cost of Civil work for STP		763613.00	Indicative provision. To be reimbursed as per actual based on details to be provided.
Sub Total E – Work Components			763613.00	
F	Other components (GST applicable)			
F1	Communication & Public Outreach		0.00	Provision is indicative. Payment will be as per actuals within the ceiling indicated.
F2	Governance and Accountability Plan (GAPP)		0.00	Provision is indicative. Payment will be as per actual within the ceiling indicated.
F3	Environmental Mitigation and Monitoring Cost (ESAMP) @ 1% of cost of Civil work for STP	Lumpsum	381806.50	The cost provisions relate to interventions on noise control, dust bins and good environment condition etc. and are the responsibility of the contractor.
Sub Total – F – Other Components			381806.50	
G	Statutory Duties			
G1	Labor cess	1% of basic capital cost	1210215.02	
Sub Total G			1210215.02	
H	GST			
H1	GST on A+B+F	18%	23595305.21	
H2	GST on O&M cost excluding power (C)	18%	24985994.20	Power costs are excluded as these are to be reimbursed as per actuals.
Sub Total H - GST			48581299.41	
Total Cost of project A+B+C+D+E+F+G+H			358347827.22	

Sybil
EE (L&B) - II

Vikram
AE

S. S. S.
JE

[Handwritten signature]

505
DELHI DEVELOPMENT AUTHORITY
OFFICE OF DEPUTY DIRECTOR (HORT.)
HORTICULTURE DIVISION NO. IV
SHEIKH SARAI, PH. I, N.D. 17

ANNEXURE-C 26

No. F. 9(3)20-21/Hort. IV/DDA/ 879

Dated: 11/08/20

To,

Sh. Amit Agrawal,
1094, Sector A, pocket B, Vasant Kunj,
New Delhi-110070.

Sub: Seeking information under RTI Act 2005.

Ref: DHSE Office Letter No. F2(14)19/RTI appeal/Hort./DDA/440 dated 28.07.2020.

Please refer to your RTI application vide Registration No. DDATY/R/20/00188 dated 28.01.2020 for seeking information under RTI Act 2005. In this regard, the matter was listed for hearing on 27.07.2020. And as per the direction issued by Director (Hort.) SE, DDA to the undersigned vide above referred reference for providing the detail of expenditure of last 05 years, the required particulars asked by you are given as under:

1. The yearly plantation details is given as under :

S. No.	Year	Plants (In Nos.)
1.	2015-16	600 Nos.
2.	2016-17	500 Nos.
3.	2017-18	200 Nos.
4.	2018-19	150 Nos.
5.	2019-20	1000 Nos.
		2450 Nos.

2. The yearly maintenance expenses incurred by Horticulture Division IV, DDA is listed as below:

S. No.	Year	Expenditure (In Rs.)
1.	2015-16	1405131
2.	2016-17	618000
3.	2017-18	1060516
4.	2018-19	2451662
5.	2019-20	2187117

The reply of all other paras has already been furnished to you vide this office letter No. F.9(3)19-20/Hort. IV/DDA/369 dated 12.03.2020 (copy enclosed).

Encl: As above.

Deputy Director (Hort.)
Horticulture Division IV, DDA

Copy to:

1. The Director (Hort.) SE, DDA for information please & w.r.t. your office letter No. DHSE.F2(14)19/RTI appeal.Hort./DDA/440 dated 28.07.2020.
2. The Assistant Director (Hort.) IV/HD-IV, DDA.

Deputy Director (Hort.)
Horticulture Division IV, DDA



Search Google Earth

A



Qutub Minar
कुतुब मीनार

LAKHI
NATH KUTI
लाखी
नाथ कुली

MEHRAULI
महरीली

KISHANGARH
VILLAGE
किशनगढ़ गाँव

Forest Area
फॉरेस्ट एरिया

800 m

POCKET B



3D

← Measure



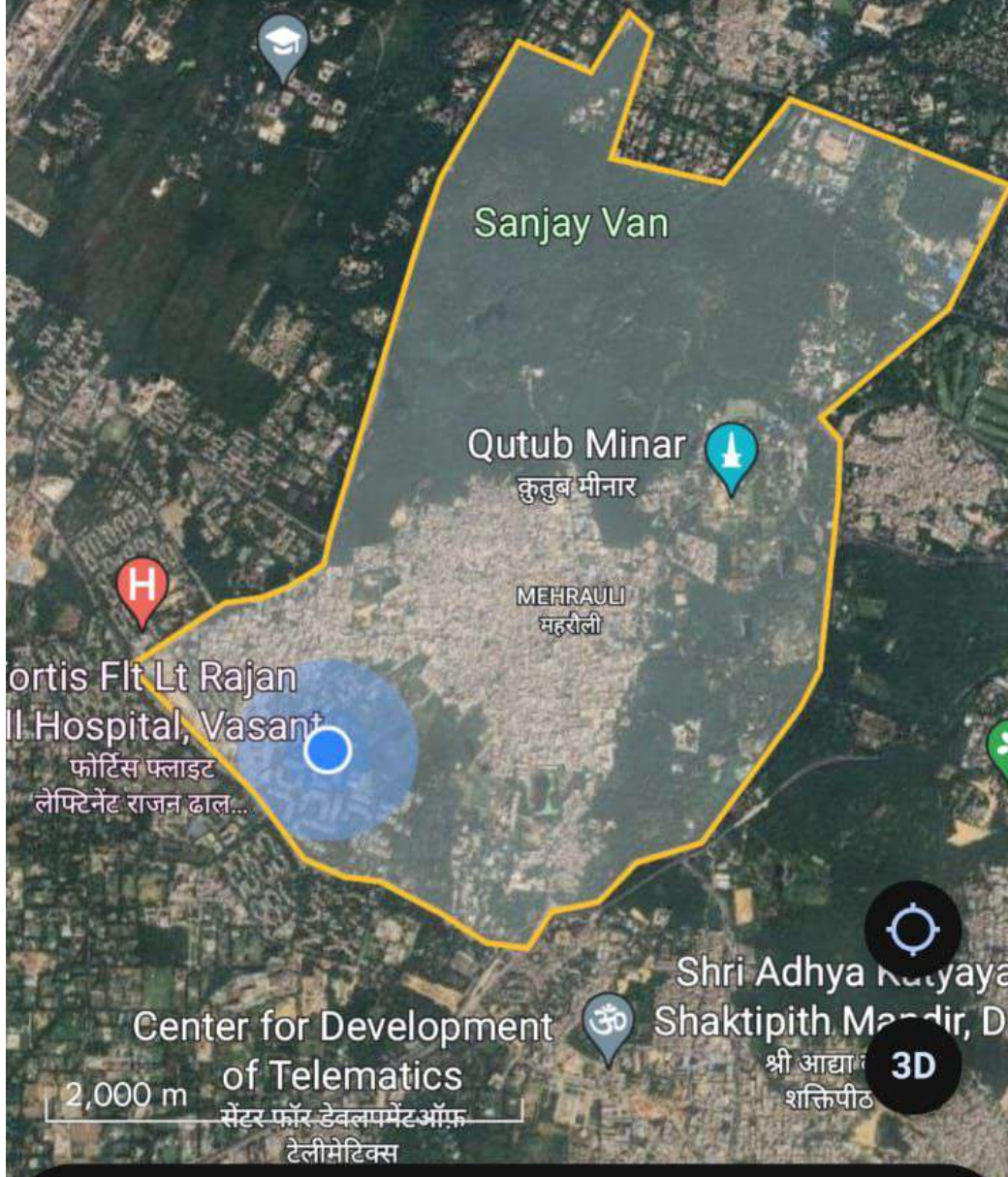
Move the map and add points to measure distances and area

Perimeter
6,017.54 m

Area
108.57 ha

Save to project

Search Google Earth



Sanjay Van

Qutub Minar
कुतुब मीनार

MEHRAULI
महरीली

Fortis Flt Lt Rajan
Hospital, Vasant
फोर्टिस फ्लाइट
लेफ्टिनेंट राजन ढाल...

Center for Development
of Telematics
सेंटर फॉर डेवलपमेंट ऑफ़
टेलीमेटिक्स

Shri Adhya Katyaya
Shaktipith Mandir, D
श्री आद्या
शक्तिपीठ

← Measure



Move the map and add points to measure distances and area

Perimeter
12,701.22 m

Area
713.87 ha

Save to project