

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 1151/2024**

IN THE MATTER OF:

SOCIETY FOR PROTECTION OF CULTURE,
HERITAGE, ENVIRONMENT, TRADITIONS AND
PROMOTION OF NATIONAL AWARENESS
(SP-CHETNA)

...APPLICANT

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

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For S P CHETNA


Honey President
APPLICANT

THROUGH

NEW DELHI

DATED: 15.10.2025


RITESH AGARWAL

COUNSEL FOR APPLICANT
GF-30-31, WORLD TRADE CENTRE,
LALIT HOTEL, BABAR ROAD,
NEW DELHI-110001
MOB NO.9999972564

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**REJOINDER BY THE APPLICANT TO THE REPLY FILED BY
RESPONDENT NO. 6 (INDRAPRASTHA GAS LIMITED)**

I, Anil Sood, a senior citizen, S/o Late Sh. M.C Sood, aged about 70 yrs., R/o C-1/1056, Vasant Kunj, New Delhi-110070, do hereby solemnly affirm and state as under:

That I am the President of the Applicant Society and am well acquainted with the facts and circumstances of the present case and as such, competent to make and affirm the present short affidavit. I have gone through the affidavits filed by Respondent No. 6 and a short reply to the same is as under:

MOST RESPECTFULLY SHOWETH:

1. That the applicant has filed O.A. No. 1151/2024 against the respondents, which pertains to "In-Situ Slum Redevelopment and Rehabilitation on Public-Private Partnership model 2019 which was initiated by



DD/Respondent No.3 of Kusumpur Pahadi under Pradhan Mantri Awas Yojana (Urban) situated on Southern Central Ridge Area.

2. The Applicant has gone through the reply filed by Respondent No. 6 (Indraprastha Gas Limited, hereinafter “IGL”) and submits this rejoinder in response thereto. The contents of the reply are denied except to the extent specifically admitted herein.

PARA-WISE REPLY:

A. The contents of **para-A** of the affidavit are **false, untrue** and contrary to the facts available on website of **Respondent No. 3**. The relevant screen shots containing details as downloaded on 06.10.2025 – copies **attached A1 (Colly)**. Further, the Applicant could not download the following documents that are available on the website of **Respondent No. 3 (DDA)**

–

- (a) Kusum Pur Pahadi – Vasant Vihar as Power Point Presentation.
- (b) Signed Minutes of Meeting as available.
- (c) List of JJ Clusters on DDA Land.
- (d) DDA In-Situ Rehabilitation Policy under PMAY.
- (e) Legible copy of **Agenda Item No. 52/2018 (File No. F2(43)2018/PMAY** – along with **Annexure “A” and “B”**. As per **Annexure “A” Respondent No. 3 is responsible for slum on DDA and Central Govt Lands** and **DUSIB is responsible for slums on MCD and Delhi Govt lands.**



Therefore, **Respondent No. 6** could not have been permitted by **Respondent No. 3** despite area admittedly under its control, being part of the Aravali Bio Diversity park and part of Morphological Ridge as per

status report dated 08-04-2025 filed by **Respondent No.(s) 2, and 5** at **running page no.(s) 293 to 301**, thus could not have granted permission undertake digging and providing piped gas connection in Kusumpur Pahadi, as has been done vide **letter No. F-1(II)/AE-II/SPD-1/DDA/2024-25/941** dated **04th November 2024** signed on **24th November 2024** (**Annexure R6/2 – running page no.(s) 413-416**). **Respondent No.3** has made vague and contradictory statements on affidavit in **the Short Reply dated 08-04-2025** relevant text of which is reproduced as under: -

Quote

“4, - At the further outset, it is stated that there is no proposal or further plan for implementation of the said proposal for In-Situ Slum Rehabilitation scheme of Kusumpur Pahadi, referred to under the Original Application.

5 - Moreover, the Kusumpur Pahadi is a jhuggi jhopri cluster forming part of the notified JJ Cluster/JJ Basti as per the List of 675 Notified JJ Bastis released by the Delhi Urban Shelter Improvement Board ("DUSIB"). This list of 675 Notified JJ Bastis was prepared by DUSIB after undertaking an extensive and comprehensive survey of the entire city in pursuance of the directions given by this Hon'ble Court in Ajay Maken v. Union of India & Ors, 2019 SCC OnLine Del 7618. Kusumpur Pahadi is a JJ Cluster with Cluster code 571 under the said list, at s.no.190.

6 - It is further stated that Kusumpur Pahari is not situated within or part of the South-Central Ridge, as sought to be alleged. The area of Moradabad Pahari Area is a protected forest, as per Forest Notification F. No. F.SCO.32(C)Noti. 80-81, dated 10.04.1980. The area of Kusum Pahari is part of Aravali Biodiversity Park. Since there are about 2000 households within the notified cluster, in view of the Aravali Biodiversity Park and restrictions in constructions there was no proposal to move forward with the project for in-situ rehabilitation. – (running page No.(s) 304 and 305)



Once admittedly the area is part of Aravali Bio Diversity Park, and part of Morphological Ridge, no development could have taken place in view of judgment pronounced by Hon'ble Supreme in the cases of: -

- (i) Delhi Development Authority vs. Kenneth Builders & Developers Ltd. & Ors. Order dated 29 June 2016 in CIVIL APPEAL NO. 5370 OF 2016.
- (ii) Dr. G.N. Khajuria & others vs Delhi Development Authority & others- 1995 (5) SCC 762.

Respondent No. 3 instead of protecting and restoring the Park is legalising illegal encroachments of not only park but also of Morphological Ridge by facilitating piped gas supply.

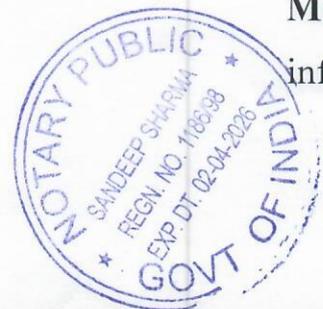
B. The contents of **Para B** do not merit any reply.

PRELIMINARY SUBMISSIONS

C. That the contents of Para "C" are matter of record, hence do not merit any reply.

D. The contents of Para "D" are matter of record, hence do not merit any reply.

E. Contents of para 'E' to the extent of Impleadment are matter of record. It may be worthwhile to state here that Respondent No. 6 was first informed through email on **11.12.2024** annexed as "**Annexure A**" of **IA No. 156/2025 at running page no.(s) 256 and 257 along with photographs** when the digging had just commenced. As a follow up to said email one **Mr. Harmeet Kataria – Cell No. 9910569500 on 14th December 2024** informed applicant that work has been started after obtaining due



permission from DDA – [para-9 at running page no. 261]. Thus, Respondent No. 6 was aware of ongoing proceedings and cannot take shelter of Impleadment on 09-04-2025.

F. The contents of these paragraphs is a matter of fact hence merits no response.

G. That, the contents of Para “F” as stated are vehemently denied in view of status report dated 08.04.2025 filed by **Respondent No.(s) 2, and 5 at running page no.(s) 293 to 301. Respondent No. 2 & 5** have admitted that the area pointed out by the Applicant falls within the territorial jurisdiction of **West Forest Division, Department of Forest and Wildlife, GNCTD**. However, the **Department of Forests and Wildlife, GNCTD (West Forest Division) does not have the possession of the said area**. Further it has been admitted that some parts of the Kusumpur Pahari falls under the Morphological Ridge. It has further been reiterated that no permission has been given for the "In Situ Slum Redevelopment and Rehabilitation on Public Private Partnership mode 2019" proposed to be implemented by the Delhi Development Authority (DDA) in Kusumpur Pahari by the Department of Forest and Wildlife, GNCTD or Ridge Management Board (RMB).

H-K. The contents of paras H to K are denied. Once it is established that the work has been carried out without obtaining prior approval of Respondent No. 5, **Respondent No.6** cannot claim any immunity particularly when it was informed.

PARA WISE REPLY TO REPLY ON MERITS



1-3: That the contents of these paragraphs are vehemently denied and the contents of the O.A are reiterated.

PARA WISE REPLY TO REPLY ON GROUNDS

- A. That, the contents of this paragraph are vehemently denied, and Ground A of the O.A. is reiterated.
- B. That the contents of this paragraph are vehemently denied and Ground B of the O.A, in view of Status Report filed by **Respondent No. 2 & 5** that too when the fact of ongoing proceedings were within knowledge of **Respondent No.6.**
- C. That the contents of paragraphs C-F are denied and Grounds of the O.A. are reiterated.

PRAYER

In view of the above, the Applicant respectfully prays that this Hon'ble Tribunal may be pleased to:

1. Reject the reply filed by Respondent No. 6 as untenable as the permission has been obtained after issuance of notice by this Hon'ble Tribunal on 10.09.2024 and communication dated 11.12.2024.
2. Direct Respondent No. 3 to place on record the documents detailed in Para "A" above before Hon'ble Tribunal.
3. Direct Respondent No. 6 to immediately restore the area to its original shape at its own cost and risk.
4. Pass imposition of environmental compensation on IGL.
5. Grant any other relief deemed just and proper in the interest of justice and environmental protection.





DEPONENT

VERIFICATION:

I deponent above named do hereby verify that the contents of the above affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed nor is any wrong statement made therein.

Verified at New Delhi on this 15th day October of 2025



DEPONENT

Ritika
IDENTIFIED BY



ATTESTED

NOTARY PUBLIC
DELHI (INDIA)

15 OCT 2025

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- ▶ **Tenders**
- ▶ **Documents regarding PMAY/ISR meeting with Developers**
- ▶ **Standard Operating Procedure (SOP) for In Situ Rehabilitation/Redevelopment Projects.**
- ▶ **PPT**
- ▶ **Policy**
- ▶ **Approved Minutes**
- ▶ **Approved minutes**
- ▶ **Minute**
- ▶ **List of JJ Clusters**



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▸ Policy

▸ Approved Minutes

▸ Minute

▸ List of JJ Clusters

- LIST OF JJ DWELLERS OF KATHPUTLI COLONY DECLARED IN-ELIGIBLE BY EDC.
- LIST OF JJ DWELLERS OF KATHPUTLI COLONY ELIGIBLE BY EDC / APPELLATED AUTHORITY.
- DEEPAK COLONY DILSHAD GARDEN (CODE NO.630)-Notice-List
- BHOOMIHEEN CAMP KALKAJI (CODE NO.385)-Notice-List
- DILSHAD COLONY DILSHAD GARDEN (CODE NO.633)-Notice-List
- Kalander COLONY DILSHAD GARDEN (CODE NO.631)-Notice-List
- NAVJIVAN -J.L. NEHRU CAMP GOVIND PURI KALKAJI (CODE NO.386)-Notice-List
- List of JJ Clusters on DDA land



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Documents regarding PMAY/ISR meeting with Developers

Standard Operating Procedure (SOP) for In Situ Rehabilitation/Redevelopment Projects.

PPT

Policy

- > DDA In-Situ Rehabilitation Policy under PMAY
- > DUSIB Policy-2015
- > DUSIB Protocol-1
- > PMAY Guidelines

Approved Minutes

Minute

List of JJ Clusters



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Re; Rejoinder to Reply by Respondent No. 6 - IGL

From Anil Sood (SPChetna) <anilsood@spchetna.com>

Date Wed 15-10-2025 11:32

To wadhwapriya73@gmail.com <wadhwapriya73@gmail.com>

Cc vcdda@dda.org.in <vcdda@dda.org.in>; vcdda@dda.org.in <vcdda@dda.org.in>; sahayk@gmail.com <sahayk@gmail.com>; pccf-gnctd@delhi.gov.in <pccf-gnctd@delhi.gov.in>; sahayk@gmail.com <sahayk@gmail.com>; Gigicgeorge.adv42@yahoo.co.in <Gigicgeorge.adv42@yahoo.co.in>; oicnd-cgwb@nic.in <oicnd-cgwb@nic.in>; chugh.divye@gmail.com <chugh.divye@gmail.com>

1 attachment (4 MB)

Rejoinder Affidavit to the reply by R-6.pdf;

Madam

Attached is the rejoinder to Reply filed by Respondent No. 6 - IGL. Kindly acknowledge the receipt.

With best wishes & kind regards

Anil Sood

Hony President - SPCHETNA

TEDx Speaker, Recipient of Man of Excellence Award 2023

A 414-415 , Somdutt Chamber -1

5 Bhikajicama Place,

New Delhi.

email: anilsood@spchetna.com

Cell. +91-9971117801

Web site: www.spchetna.com

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