

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

Original Application No. 1247 of 2024

Kings Garden Resident Welfare Society

... Applicant

Versus

State of Punjab and Others

... Respondents

Rejoinder to the reply filed by the Respondent No. 2, 3 and 6.

I N D E X

S.N	Particulars	Date	Pages
1.	Rejoinder	07.03.2025	1-3
2.	Annexure A-9 (aks sajra)	NIL	4-5
3.	Annexure A-10 (relevant part of Jamabandi)	04.03.2025	6-7
4.	Annexure A-10 (relevant part of Jamabandi) (Vernacular)	04.03.2025	8

Chandigarh
Dated: 07.03.2025


(Piyush Sharma)
Advocate / P-2552/2008
Counsel for the Applicant

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Rejoinder to the reply filed by the Respondent No. 2, 3 and 6.

RESPECTFULLY SHOWETH:-

1. That the replies filed by the respective Respondents are manipulated and concocted one. The true facts and circumstances have not been brought before the Hon'ble Tribunal with the sole purpose to defeat the claim of the Applicant.
2. That although the original application filed by the Applicant is a detailed one however the Respondents have not replied to the specific contentions made therein which shows the violation of SWM Rules, 2016.
3. That the reply filed by the Respondent No. 3, 4 and 6 are contradictory to each other. The perusal of the reply filed by the Respondent No. 3, 4 makes it abundantly clear that it is nowhere mentioned that the Schedule I of SWM Rules, 2016 do not apply on the site in question rather the Respondent No. 6 is only distorting the facts by misleading the Hon'ble Tribunal. The perusal of the reply filed by the Respondent No. 3 and 4 clearly shows that the Respondent No. 6 have constructed about 15 honeycomb compost pits for the treatment of organic waste generated from Municipal Solid Waste. The composting site of Municipal Corporation, Jalandhar is situated adjoining to Kings Garden, therefore undisputedly there is a grave

violation of the provisions of Solid Waste Management Rules, 2016. Whereas the perusal of the Para No. 5 of the reply filed by the Respondent No. 6 contains wrong submissions to mislead the Hon'ble Tribunal.

4. That the rules of Solid Waste Management Rules, 2016 are applicable on the site in question especially referred under the Schedule I thus the contentions raised by the Respondent No. 6 are completely wrong and hence denied.
5. That it is relevant to mention here that the wrong figure of wet/biodegradable average waste generation per household out of total 4600 households has been given which is not only unfounded but also unbelievable that only 0.6 KG per day waste is estimated from one household. It is relevant to mention here that about 6 months ago the Respondent No. 6 has given approval to various residential projects near the site in question therefore the total number of households are much more than 4600 as of now and will be increased in near future.
6. That the Respondent No. 6 may not be allowed to construct/operate the composting centre and land fills in question in violation to the rules provided under the Solid Waste Management Rules, 2016.
7. That the Applicant is also producing aks sajra and jambandi which makes it evident that the land where the Respondent No. 6 want to operate composting centre actually it was proposed for construction of school. A copy of above said aks sajra and jamabandi dated 04.03.2025 is being appended as **Annexure A-9** and **A-10** for the kind perusal of the Hon'ble High Court.
8. That the perusal of the above said jamabandi also shows that the land which is being claimed by the Respondent No. 6 does not even belong to Municipal Corporation, Jalandhar.

It is therefore prayed that the original application may kindly be allowed and the Respondent may kindly be directed not to construct/operate the composting centre under challenge.

Chandigarh
Dated: 07.03.2025

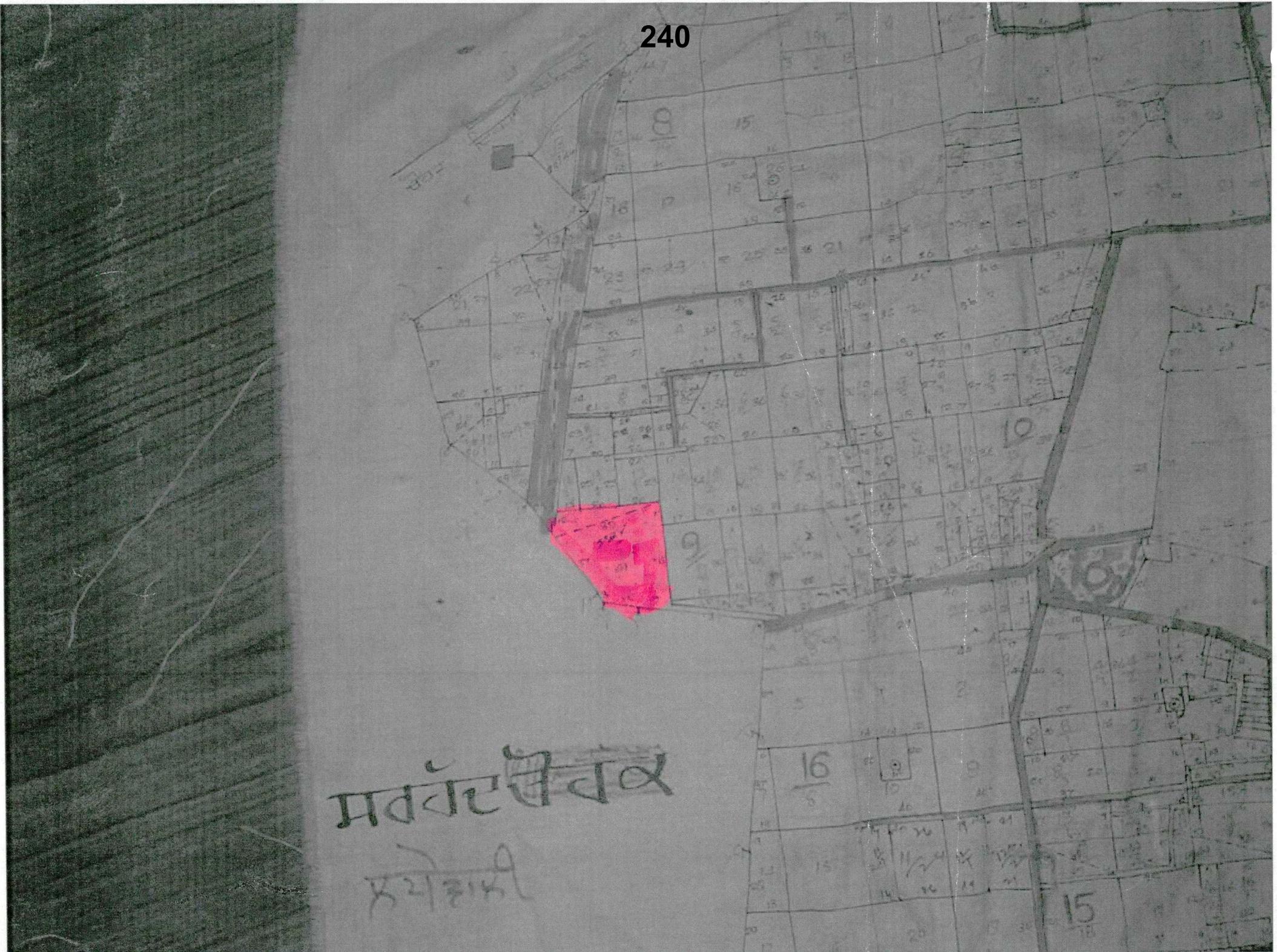

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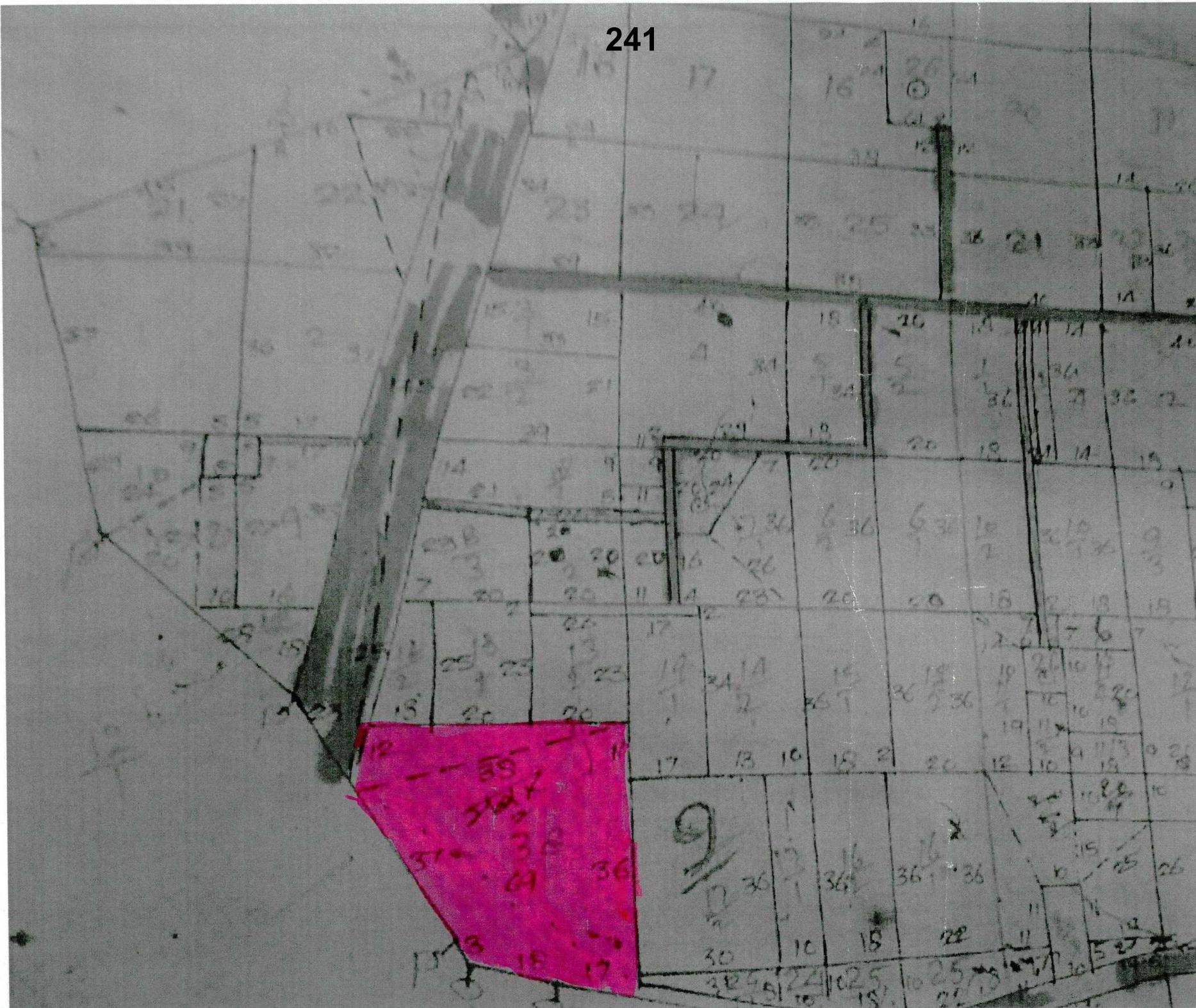
Annexure 9

महाराष्ट्र

सुप्रीम



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True Photocopy

J. R. H.

6

Annexure A-10

Jamabandi

Jamabandi 2021-22 village Nangalshama Hadbast No. 219, Tehsil Jalandhar-1, District Jalandhar

1	2	3	4	5	6	7	8
Khewat Or jamabandi	Khatauni no.	Name of owner	Cultivator Name	Source of irrigation	Muraba and Khasra no.	Area	Remarks
	363		Rafai Aam		38/2	12-0 (0-60-70.28 G.M. veterinary hospital and pond	
XXXXX							
XXXXX							

Taxation No. 39948 Total page 36

employee name, designation : Jasveer Copy operator, mutation Centre, Jalandar-I

total fee: 900

Page 36 and 26 printing date: 04.03.2025 03:30:56:210 pm

The revenue record of Patwari is recorded in the computer till date 04.03.2025

Certified to be true and correct translation/Relevant Extract



Advocate

1	2	3	4	5	6	7	8
ਖੇਵਟ ਨੰ:/ ਮਾਲ/ਪੱਤੀ, ਨੰਬਰਦਾਰ	ਖਤੋਨੀ ਨੰਬਰ/ ਲਗਾਨ	ਮਾਲਕ ਦਾ ਨਾਂ ਅਤੇ ਵੇਰਵਾ	ਕਾਸ਼ਤਕਾਰ ਦਾ ਨਾਂ ਅਤੇ ਵੇਰਵਾ	ਸਿੰਚਾਈ ਦਾ ਸਾਧਨ	ਮੁੱਕਾ ਅਤੇ ਖਸਰਾ ਨੰਬਰ	ਰਕਬਾ ਅਤੇ ਭੌਂ ਦੀ ਕਿਸਮ	ਵਿਸ਼ੇਸ਼ ਕਥਨ
	363		ਰਵਾਏ ਆਮ		38/2	12-0 (0-60-70.28) ਗੈ.ਮੁ. ਪਸੂ ਹਸਪਤਾਲ ਵਾ ਫੁੱਪੜ	
					39ਮਿ ਨ	1-15 (0-8-85.25) ਗੈਰਮੁਮਕਿਨ	
					41	5-7 (0-27- 6.34)	
						5-2 (0-25-79.87) ਗੈਰਮੁਮਕਿਨ ਸਕਲ	
						0-5 (0-1-26.46) ਗੈਰਮੁਮਕਿਨ ਜਠੇਰੇ	
					42	0-16 (0-4-4.69) ਗੈਰਮੁਮਕਿਨ ਗਰਾਉਂਡ	
				ਕੁਲ	ਕਿੱਤੇ 4 ਮਿੰਨ 1 ਸਾਲਮ 3	19-18 (1-0- 66.56)	
						19 ਕਨਾਲ 18 ਮਰਲਾ (1 ਹੈਕਟੇਅਰ 0 ਏਅਰ 66.56 ਸੈਟੇਅਰ) ਗੈਰਮੁਮਕਿਨ	
						12 ਕਨਾਲ 0 ਮਰਲਾ (0 ਹੈਕਟੇਅਰ 60 ਏਅਰ 70.28 ਸੈਟੇਅਰ) ਗੈ.ਮੁ. ਪਸੂ ਹਸਪਤਾਲ ਵਾ ਫੁੱਪੜ	
						1 ਕਨਾਲ 15 ਮਰਲਾ (0 ਹੈਕਟੇਅਰ 8 ਏਅਰ 85.25 ਸੈਟੇਅਰ) ਗੈਰਮੁਮਕਿਨ	
						0 ਕਨਾਲ 16 ਮਰਲਾ (0 ਹੈਕਟੇਅਰ 4 ਏਅਰ 4.69 ਸੈਟੇਅਰ) ਗੈਰਮੁਮਕਿਨ ਗਰਾਉਂਡ	
						0 ਕਨਾਲ 5 ਮਰਲਾ (0 ਹੈਕਟੇਅਰ 1 ਏਅਰ 26.46 ਸੈਟੇਅਰ) ਗੈਰਮੁਮਕਿਨ ਜਠੇਰੇ	
						5 ਕਨਾਲ 2 ਮਰਲਾ (0 ਹੈਕਟੇਅਰ 25 ਏਅਰ 79.87 ਸੈਟੇਅਰ) ਗੈਰਮੁਮਕਿਨ ਸਕਲ	

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Annexure A-10
(vernacular)

True Photocopy
Relevant
Part 1/8

