

IN THE HON'BLE NATIONAL GREEN TRIBUNAL, NEW DELHI

OA No. 391 of 2022

IN THE MATTER OF :

Brigadier Paramjit Singh and Other

...Applicants

Versus

State of Haryana and Others

...Respondents

REPLY ON BEHALF OF RESPONDENT No. 2 MUNICIPAL CORPORATION, GURUGRAM

1. That the above subjected OA has been filed primarily against the proposed construction of a commercial complex in respect of which, a notification was published by the Respondent No.3 i.e. Haryana Shehri Vikas Pradhikaran for e-auction to be held on 29.05.2022. Further, it has been prayed for restoration of water body on the land under ownership and control of Respondent No.3. Thus, grievance of the applicant is mainly against the Respondent No.3 and no cause of action has arisen to file the present OA against the answering respondent.
2. That answering respondent is filing present reply dealing with issues of Construction & Demolition (C&D) waste and liberty is being craved to file detailed reply/additional affidavit as and when need arise, with the permission of this Hon'ble Tribunal. The contents of OA may be treated as denied unless those have been admitted specifically.



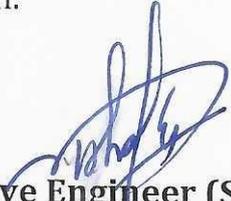
3. That in respect of dumping of Construction & Demolition (C&D) waste on the land referred in the OA, it is humbly submitted that answering respondent is not using the land in question as secondary point for collection and transportation of C&D waste. Rather, same might have been dumped by residents of near vicinity. The applicants have not impleaded those persons involved in dumping of C&D waste on the land in question.

It is worthwhile to mention here that answering respondent has already entered into an agreement with M/s ILFS Environmental Infrastructure and Services Limited (now, Indo Enviro Integrated Solutions Ltd.) to Set up, operate and maintain C & D Waste Management facility for processing of the C&D Waste as per relevant Rules. Accordingly, the concessionaire has already established the C & D Waste processing facility at village Basai (Gurugram) for proper disposal of construction & demolition waste generated in Municipal Limits of Gurugram. The C & D waste is being lifted and sent to this designated site for scientific disposal through the concessionaire.

4. That the land in question falls under Khasra no. 26/26/2 of Village Silokhra, Gurugram and the same is under the ownership of respondent no.3. After receiving request from the respondent no.3, Waste material was immediately lifted and sent to designated site by the answering respondent. The land in question is clean and no malba is presently lying on the spot/site. The photographs of the site are attached as **Annexure R-1.**



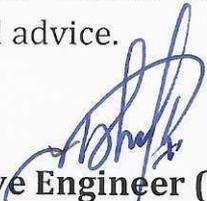
In view of the submissions made herein above, it is humbly prayed that present OA may kindly be dismissed qua the answering respondent. Any directions passed by this Hon'ble Tribunal shall be complied with.



**Executive Engineer (SBM),
Municipal Corporation,
Gurugram.**

Verification:

Verified at Gurugram on 17 day of November, 2022 that contents of the above reply are true and correct as per information derived form the official record and legal submissions are being made as per legal advice.



**Executive Engineer (SBM),
Municipal Corporation,
Gurugram.**

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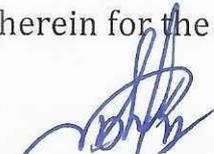
...Respondents

AFFIDAVIT

I, Vishal Garg, Executive Engineer(SBM), Municipal Corporation of Gurugram, do hereby solemnly affirm and declare as under:

1. That I am authorised Representative of respondent No.2 in the present matter. I have made myself conversant with the facts of the present case and therefore, I am competent to depose this affidavit.
2. That the accompanying reply has been drafted by my Counsel under my instructions. Same may kindly be read as part of this affidavit as the same are not being repeated herein for the sake of brevity.




DEPONENT

VERIFICATION:

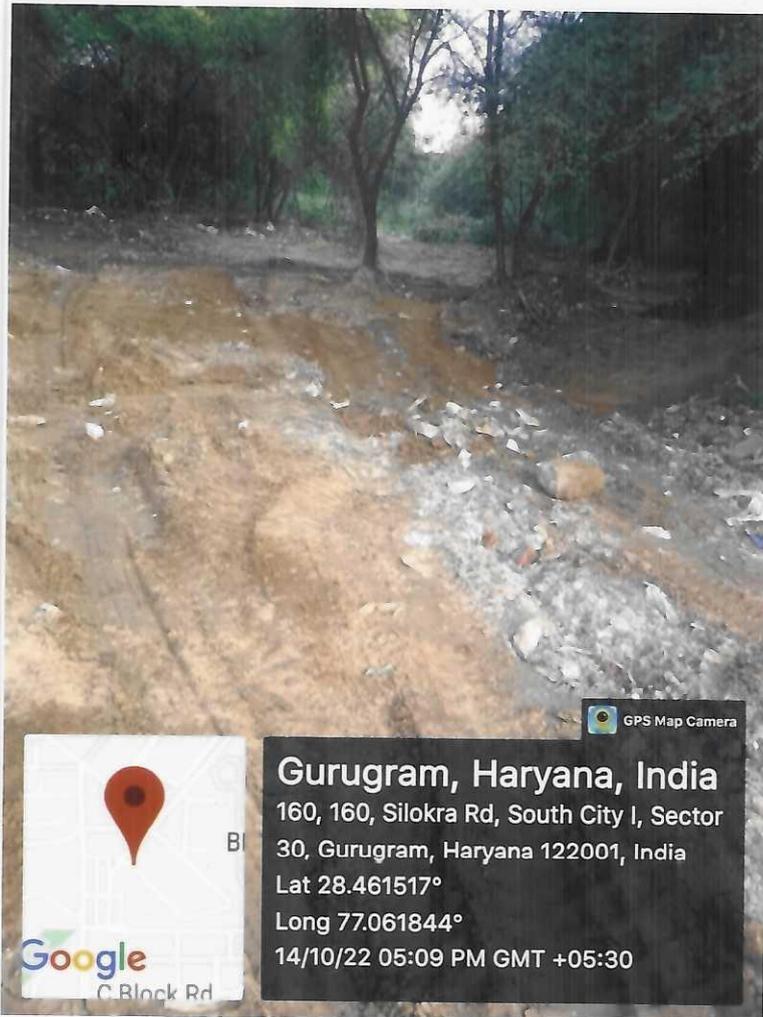
Verified at Gurugram on this 17 day of November, 2022 that the contents of above affidavit are true and correct to the best of my knowledge and information derived from official record. No part of it is incorrect and nothing material has been concealed therefrom.

ATTESTED AS IDENTIFIED


SUMAN
ADVOCATE & ...
DISTT. COURT, GURUGRAM

17 NOV 2022


DEPONENT



GPS Map Camera



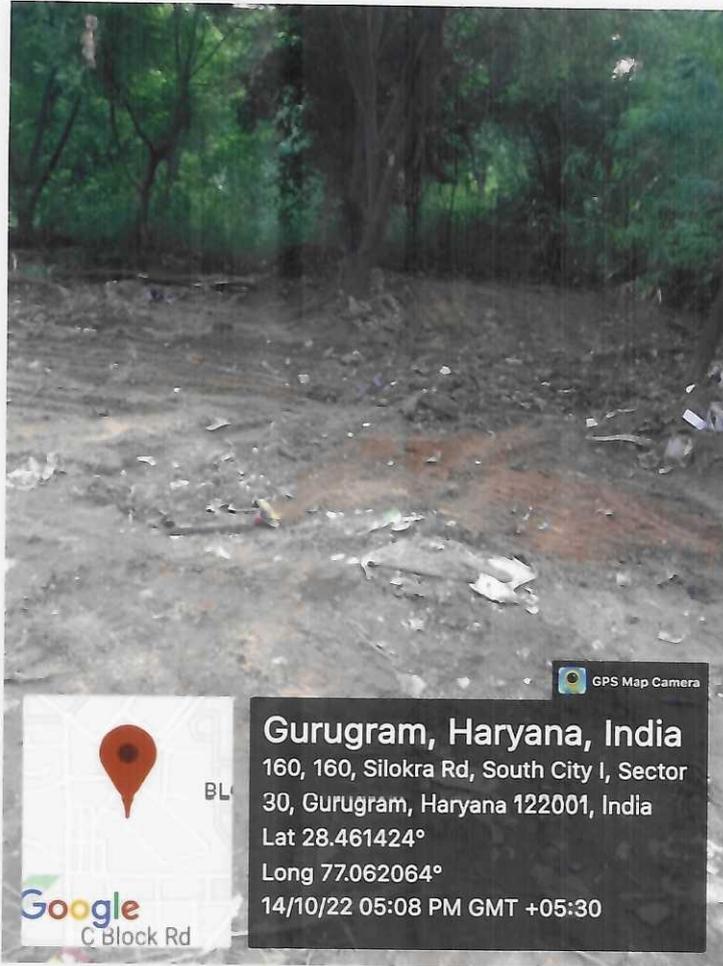
Gurugram, Haryana, India

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30, Gurugram, Haryana 122001, India

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Long 77.061844°

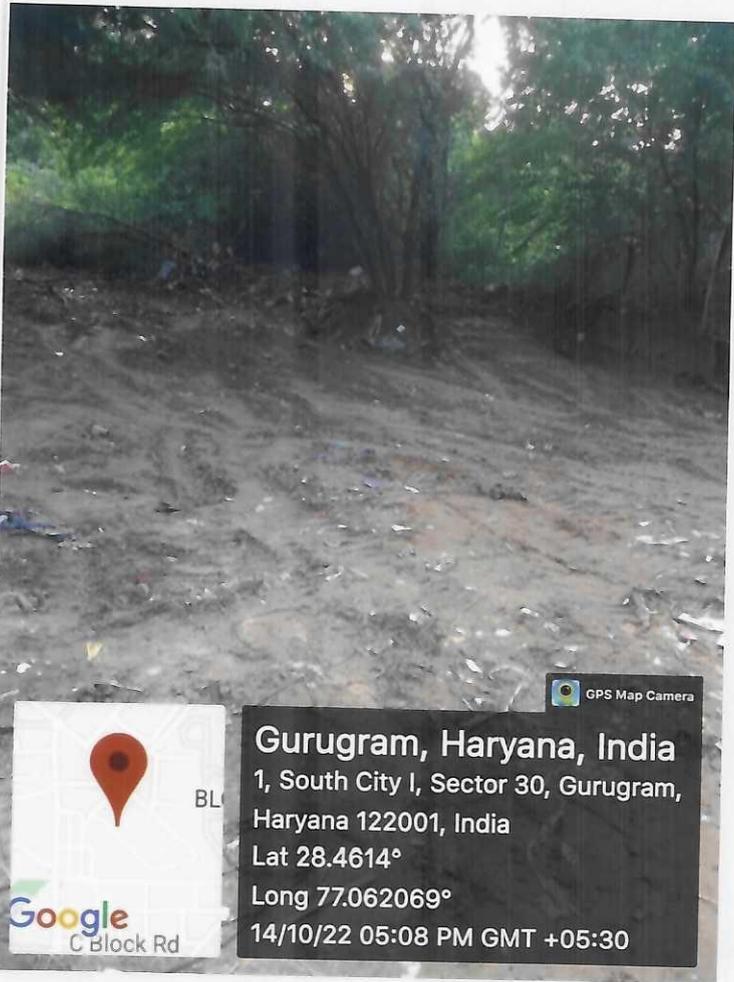
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GPS Map Camera



Gurugram, Haryana, India
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30, Gurugram, Haryana 122001, India
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Long 77.062064°
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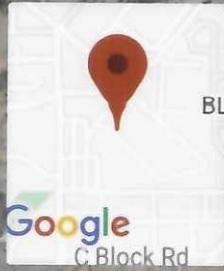
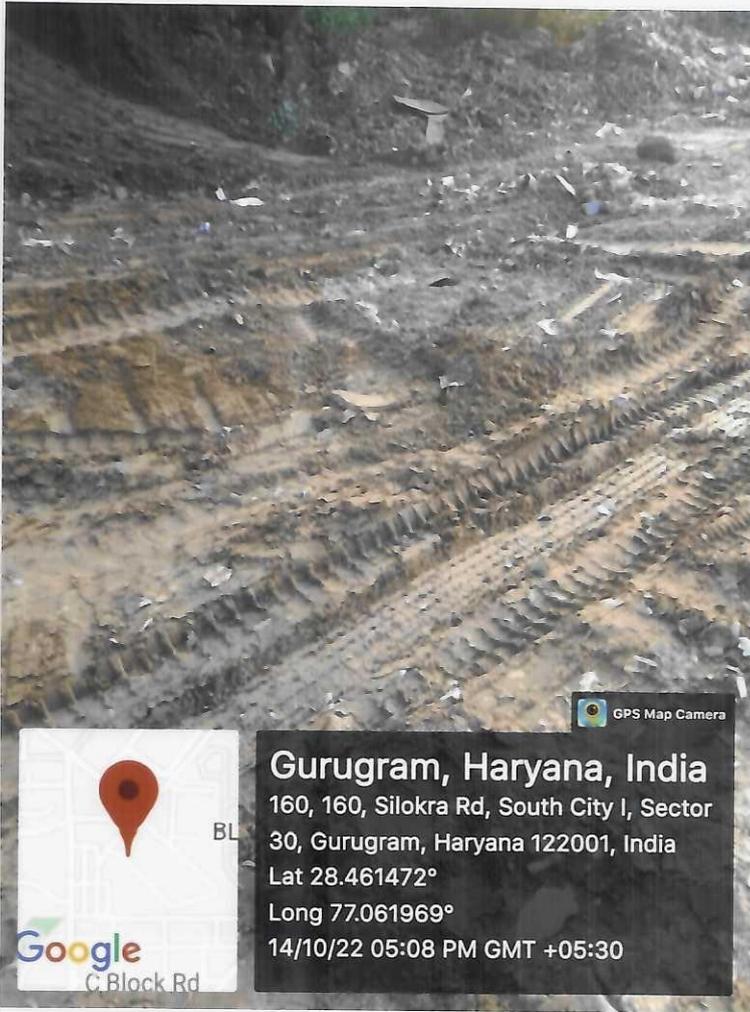
Gurugram, Haryana, India

1, South City I, Sector 30, Gurugram,
Haryana 122001, India

Lat 28.4614°

Long 77.062069°

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Gurugram, Haryana, India

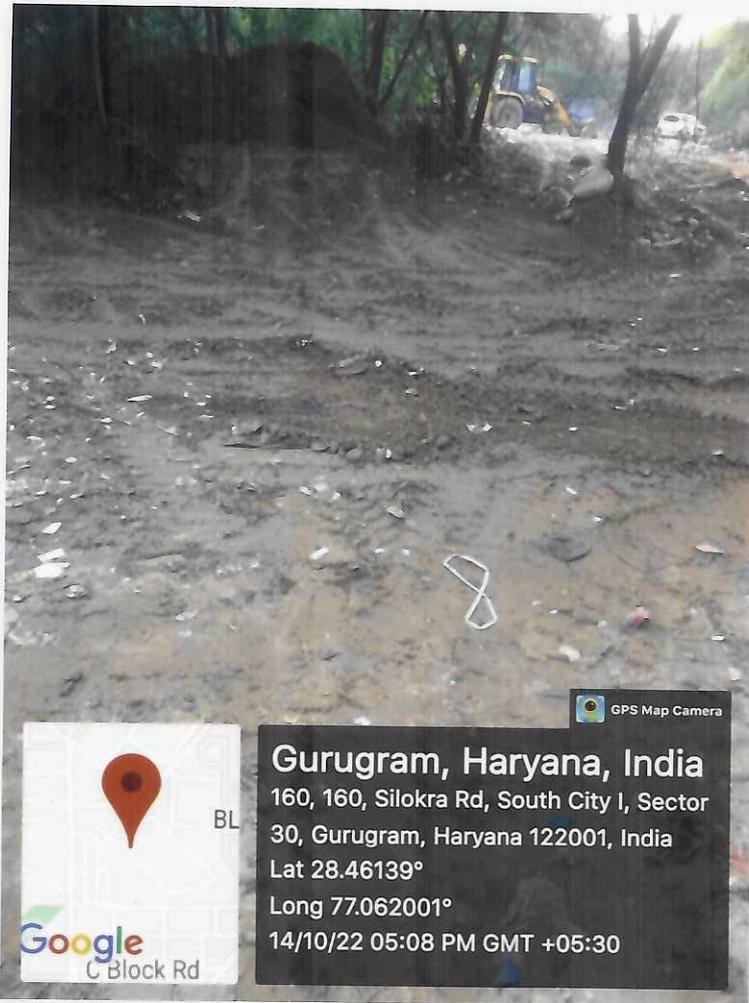
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30, Gurugram, Haryana 122001, India

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GPS Map Camera



GPS Map Camera



Gurugram, Haryana, India

160, 160, Silokra Rd, South City I, Sector
30, Gurugram, Haryana 122001, India

Lat 28.46139°

Long 77.062001°

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