

**BEFORE THE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI**

Original Application No. 246 of 2025

IN THE MATTER OF:

Ram Chander Bhardwaj

...Applicant

Vs.

Govt. of GNCT of Delhi & Ors

..Respondents

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Delhi

Dated: 08.11.2025

Through

Sandeep Bhardwaj

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**REJOINDER ON BEHALF OF APPLICANT TO THE REPLY AFFIDAVIT
OF RESPONDENT NO. 1 & 3**

MOST RESPECTFULLY SHOWETH:

PARAWISE REPLY:

- 1 & 2 That in response to Para 1 & 2 of the reply affidavit filed by R-1 & 3, it is pointed out that these Paras are not disputed hence needs no comments.
3. In response to Para 3 of reply affidavit, it is further reiterated that letter dated 13.07.2022 is itself an indicator that the Wetland Authority of Delhi i.e. R-3 was in the knowledge of then existing state of affairs and as well the status of the subject water body which finds mention in the e-mail of Sh. Sushil Kumar along with attached photographs of the site sent to R-3. Notwithstanding the fact that they knew it well before but had been sleeping over their statutory duties to preserve, protect, rejuvenate, restore and beautify such an ancient and historic water body.
4. In response to Para 4 of the reply affidavit, R-3 has derelicted in the duties to further take any effective action for the purpose of enlisting the said water body in the LIST OF WETLAND OF DELHI.

Further it is pointed out that the letter dated 10.06.2025 is only having reference to the subject water body that too after filing the instant application before this Hon'ble Tribunal. Prior to it, R-3 remained in deep slumber and has done nothing except to enter into the present correspondence with R-2 i.e. DDA, being the land owning agency. Since 2019, this issue has remained on papers only despite R-8 being well aware of the whole issue of great importance of public interest as well as of environment interest of the society.

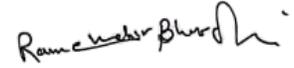
- 5 & 6 In response to Paras 5 & 6 of reply affidavit, it is pertinent to mention here that these Paras are mutually destructive and inconsistent with each other and it is reflected that R-1 & 3 are approbating and re-approbating having these Paras under and are trying to absolve itself of their responsibilities and mandatory obligations to be discharged by them alone though in coordination with R-2 i.e. DDA but they can't abdicate their responsibilities and duties at same.
7. Para 7 of the reply affidavit is personal to themselves. However, they should be put to strict terms for failing in their duties.

Despite appreciating the continuous efforts of an octogenarian applicant/petitioner for protection, preservation, revival, rejuvenation and beautification of the said ancient and historic water body, it is highly surprising the concerned respondent is placing hurdles on each and every path for reason extraneous.

Beside the above, the reply affidavit may not be taken into consideration being improper, baseless and ambiguous reply to application filed by the applicant. The same deserves to be rejected out rightly and

throw in air. The respondent is taking the inconsistent stance and finds to escape from the substantial responsibilities by filing this reply affidavit. Hence, it is requested that this Hon'ble Tribunal would be pleased to discard the reply affidavit filed by the respondent.

It is submitted accordingly.



Applicant

Delhi

Dated: 08.11.2025

Through



Sandeep Bhardwaj

Counsel for applicant

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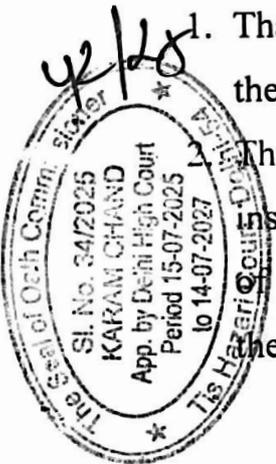
.....RESPONDENTS

AFFIDAVIT

I, Ram Chander Bhardwaj, S/o Sh. Uday Ram Bhardwaj aged about 80 years, R/o H. No. 34, Nai Basti, Mamurpur, Narela, Delhi-110040, do hereby solemnly affirms and declare as under:

1. That I am the applicant in the aforementioned Original Application and therefore competent to swear the present Affidavit.

That the accompanying Rejoinder has been drafted by my counsel on my instructions and the contents of the same are true and correct to the best of my knowledge and belief and nothing material has been concealed therefrom.



Ram Chander Bhardwaj
DEPONENT

Sandeep Verponent who
I identified the deponent who
has signed in my presence

verified on this **08 NOV 2025** of November 2025 at Delhi, do hereby verify and declare that the facts mentioned above are true and correct and nothing material has been concealed therefrom and no part of it false.

Ram Chander Bhardwaj
Sandeep (Adv)
42/25

Ram Chander Bhardwaj
DEPONENT

KARAI
Oath Commissioner, Delhi
08 NOV 2025