

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***Sandeep Bhardwaj****Advocate for Applicant****Ch. No. 687, Western Wing,****THC, Delhi-110054****Mob.: 9582777110****Email: advsandeepbhardwaj14@gmail.com**

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PRINCIPAL BENCH, NEW DELHI
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**REJOINDER ON BEHALF OF APPLICANT TO THE REPLY AFFIDAVIT
OF DISTRICT MAGISTRATE (NORTH)- RESPONDENT NO. 8**

MOST RESPECTFULLY SHOWETH:

PARAWISE REPLY:

1. In response to Para 1, the contention as raised with regard to the R-8's personal to him hence needs no comments.
2. As per the contentions as raised in Para 2 of the reply affidavit, it is factually incorrect in as much as Halqua Patwari Report is not as per the site. It is however further reiterated that the subject pond which is erroneously stated to reiterated to be vacant rather a large tract of the subject pond is under encroachment made by local people including the school. Based on Halqua Patwari Report, the contention raised in Para under reply is wholly misplaced and mis-conceived. The annexed Annexure-A with the report is self explanatory and self speaking regarding the fact.
3. In response to Para 3 of the reply affidavit under reply, it is pointed out that the respondent is deviating from exact position at site. The alleged TSM Demarcation is not at all required in wake of REV/PVT/MMPUR/ TOPO/14DEC22/REV-0 duly signed on 03.06.2015 already carried out

which is available with respondent's office for reason extraneous, the same is not being brought to kind consideration and perusal of this Hon'ble Tribunal.

4. In response to Para 4, the contents as raised regarding the aforesaid land has already been acquired vide Award No 202/1986-87 which is not denied by the applicant. In fact, the applicant in his own original application has already disclosed this information himself and annexed the relevant document. However, such a plea pertaining to the land stands as acquired in no manner strengthened the contention of respondent rather it reflects on respondent that upon a Govt. land, how an encroachment had mushroomed at site and the concerned statutory authority can't absolved of their responsibility for protection, preservation, revival, rejuvenation and beautification of the said historic and ancient water body earmarked for the purpose since very inception.
- 5 & 6 In response to the Paras 5 & 6 of the reply affidavit, it is submitted that the plea taken is of no assistance to respondent. As a matter of fact, the nature, character and status of the land will not undergo a change because of these subsequent statutory changes as referred that has been taken place. The contention as raised is just a subterfuge being adopted by the respondent in order to obligate their responsibilities of protection, preservation, revival, rejuvenation and beautification of the said historic and ancient water body which is of great importance of common utilities.
- 7 & 8 In response to Paras 7 & 8 of the reply affidavit under reply also is of no help to the respondent. The respondent is making the situation more murkier by willfully, deliberately and intentionally placing reliance in documents pertaining to the year 1984-85, but withholding its own survey report i.e. REV/PVT/MMPUR/ TOPO/14DEC22/REV-0 duly signed on 03.06.2015

carried out by same respondent which reflects the true, correct and exact description of the said ancient and historic pond.

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.

Delhi

Dated: 08.11.2025

Through



Applicant



Sandeep Bhardwaj

Counsel for applicant

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ORIGINAL APPLICATION NO 246 OF 2025

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VERSUS

GOVT OF NCT OF DELHI & ORS

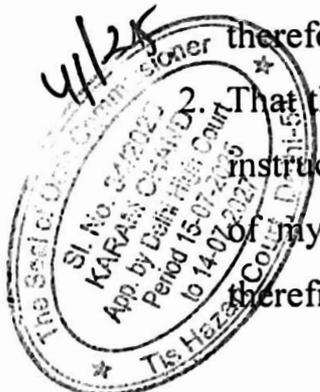
.....RESPONDENTS

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.

2. 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
I identified the deponent who has signed in my presence

VERIFICATION:

Verified on this day ... 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.

NOV 8 2025

Ram Chander Bhardwaj
Uday Ram Bhardwaj
Sandeep
Ram Chander Bhardwaj
DEPONENT

KARASHI CHANDER
Oath Commissioner, Delhi