

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL AT  
NEW DELHI

O.A. NO. 1348 OF 2024

**IN THE MATTER OF:**

ANAND PURI GOVIND GARH TANK ROAD  
RESIDENTS WELFARE ASSOCIATION ... APPLICANT

VS

GOVT OF NCT OF DELHI AND ORS ... RESPONDENTS

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NEW DELHI

DATED: 12.8.2025

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ANAND PURI GOVIND GARH TANK ROAD  
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REPLY ON BEHALF OF RESPONDENT NO.8-FAITH  
ACADEMY TO THE SAID O.A.

**MOST RESPECTFULLY SHOWETH:**

At the outset the answering Respondent No.8-School denies each and every allegation as contained in the said O.A. except to the extent the same are a matter of record or what is specifically admitted hereinafter. All the contentions of the Applicant are denied and nothing be deemed to be admitted for reasons of non-traverse.

REPLY AND OBJECTIONS TO THE SYNOPSIS AND LIST OF  
DATES FILED BY: -

1. It is wrong and denied that on 14.06.1980 the then Lt. governor who was the chairman of DDA inaugurated the park in this area. The petitioner has not identified specifically with metes and bounds as to which park was inaugurated. The location of the

alleged park has not been identified by the petitioner. Whether the park which is shown as the subject matter of the present petition is the play field inside the school or where it was situated when the alleged inauguration took place. There was no such park located behind the Tank Road, Anandpuri area within the jurisdiction of the Prasad Nagar police station area in 1980 which was a place for meeting of senior citizens and playground for the children. No such inaugural stone or otherwise bearing the name of the LG or anybody else was placed or was displaced by the school or Kalindi College. The answering respondent No. 8 is hereby objecting the use of the defamatory word "ENCHROACHER SCHOOL" and the respondent No.8 reserves its rights to sue and prosecute the petitioner along with his accomplices for causing defamation to the respondent school. If any park which was the park existing in 1980 then whether it was within the premises allotted to school or outside the school. No such park ever existed hence not existing as alleged or otherwise. This petition has been filed with malafide intention to harass the managing committee of the school, its staffs and its students and ultimately the parents of the students. Even Anand puri colony which is a J.J. colony under (JHUGGI JHONPRI REMOVAL SCHEME) was not existing in 1980. It came to

existence in the year 2007 and slowly it grew into haphazard growth for the last 10 years and in 2017 this colony was proposed for regularization and ultimately in 2019 the DDA regularized this colony comprising of unauthorized structures dwellers on government land or others land. Now after regularization the residents of erstwhile unauthorized colony have and got registered a resident welfare society without disclosing the aims and objects and list/names of the governing body to this Hon'ble tribunal and the present petition has been filed without any supporting resolution whereby authorizing the person Mr. Ranjeet Kumar. Hence in absence of any such resolution by any duly elected committee approved by the concerned registrar of society, govt. of NCT of Delhi. Hence The present petition has not been instituted by any duly authorized person of the petitioner/applicant society. Hence the petition is liable to be dismissed.

2. It is further wrong and denied that in march 2017 any writ petition against the encroachment of the park was filed by the Faith Academy School. The petitioner has not disclosed the numbers and details or title or ultimate fate of the petition and how the said petition was or is relevant to the issue of park or tank/pond. The

petitioner/applicant is just misleading this Hon'ble tribunal with irrelevant allegations under the garb of averments.

3. It is further wrong and denied that on 04.05.2017 the Hon'ble High Court directed to decide about the park encroachment by Faith Academy School. The subject matter of the said writ petition was the measurement of the play field which was allotted by the DDA by measuring with manual method. Later on, the same DDA measured the land by LASER METHOD which due to its precised method showed some extra land within the permissible limits due to measurement technique. The school has fled a writ petition regarding the method adopted or in alternative to re-measure it with the same method which was used at the time of allotment and not by the LASER METHOD or any other sophisticated method not utilized at the time of allotment. The alleged writ petition cited by the petitioner/applicant was never pertaining to any park rather it was pertaining to the measurement of the play field (0.95 acres allotted to the school by DDA on 26.04.1984 on temporary lease basis rather in the year 1984 a perpetual lease in respect of land for school building and temporary lease for play field was executed on 30.11.1984 where there was a no tank or pond and at that time the petitioner was not even in existence. Later in year around 2015 the

dispute of measurement was raked up by the some interested persons who were interested in encroaching upon the parking sites/parking area meant for the school and available at the outside of the two gates of the school in connivance with the parking contractor and unauthorized tank road market shopkeepers.

4. It is further wrong and denied that there was any contempt of the order dated 04.05.2017 by the respondent school or any of its staff and there was no contempt of any nature whatsoever as alleged or otherwise which is evident from the final order dated 01.02.2023 which was passed in the civil contempt case No. CONT.CAS(C) 614/2017.
5. It is further wrong and denied that on 21.02.2018 any grievances related to the alleged park was submitted for the alleged unlawful act at the hand of the school as alleged or otherwise for want of knowledge to then school. However, the answering respondent No. 8 has been wrongly termed as "VIOLATOR SCHOOL", which is false and defamatory in nature and the answering respondent reserves its rights to sue and prosecute all the persons and their accomplices who are responsible for such defamation.

6. It is further wrong and denied for want of knowledge that on 14.03.2018 any application under RTI Act 2005 was filed to the PIO of kalindi College.
7. It is further wrong and denied for want of knowledge that on 07.05.2018 that any reminder letter was sent to Kalindi College as alleged or otherwise.
8. It is further wrong and denied for want of knowledge that on 15.10.2018 that multiple representation was sent to various authorities against Kalindi College or the answering respondent school. The applicant is defaming the answering respondent by using such words as “VIOLATOR SCHOOL” against which the answering respondent reserves its rights to sue and prosecute the petitioner and its accomplices for the defamation.
9. It is further wrong and denied for want of knowledge that on 04.11.2018 a complaint was made to the central police control room. It is not clear that what alleged illegal acts were complained and such assertion and allegation contained under the reply are vague and non-specific as to whether it was related to play field or tank or park or if park then which park as there is no existing park since 1983 when the allotment was made to the petitioner school.

10. It is further wrong and denied for want of knowledge that on 08.11.2018 the office of the alleged ministry issued the direction as alleged or on 10.12.2018 such representation as alleged were made.
11. It is further wrong and denied for want of knowledge that on 10.04.2019 any such writ petition was filed against Kalindi College as alleged. The answering respondent No. 8 has filed writ petitions against the DDA regarding the wrong mode of measurements and coming out a plea by DDA that some extra land is available with the respondent school and such show cause notice by the DDA has been stayed by the Hon'ble High Court of Delhi.
12. It is further wrong and denied that the applicant is pursuing the cause of restoration reclaiming the natural pond or 100ft passage as alleged or otherwise. Rather there was never a pond or 100ft wide passage ever existed in the year 1983 or prior to that.
13. That the present O.A. (Original Application) under reply is most malafide application without any cause of action and the same is liable to be dismissed with costs.

**PRELIMINARY OBJECTION:**

14. That there is no cause of action for the present Petition and the petitioner has filed the present Petition without any cause of action and as such the present Petition is not maintainable and is liable to

be rejected or dismissed. Two writ petitions being W.P ( C ) no. 13732/2021 and W.P ( C ) no.14561/2021 pertaining to play field area and school building area respectively relating to the dispute regarding measurement and extra land area due to two different measurement methods adopted by DDA are pending and there are interim protection granted by the Hon'ble High court of Delhi and applicant has already moved an application for impleadment and vide orders dated 03.12.2021, 12.05.2022, 23.09.2022 and 08.11.2023 passed in W.P ( C ) no. 13732/2021 and interim protection order dated 17.12.2021 passed in W.P ( C ) No.14561/2021 has been made absolute vide order dated 08.11.2023. The copies of order dated **03.12.2021, 12.05.2022, 23.09.2022** and **08.11.2023** passed in W.P (C) No. 13732/2021 are annexed hereto as **Annexure R8/1, Annexure R8/2, Annexure R8/3, Annexure R8/4**, respectively. The copies of interim protection order dated **17.12.2021** and order dated **08.11.2023** passed in W.P (C) No.14561/2021 are annexed hereto as **Annexure R8/5** and **Annexure R8/6** respectively.

15. That the present Petition is also not maintainable for the reason that the present land use as a play field is a mandatory requirement for recognition or affiliation of a school with Central Board Of

Secondary Education (hereinafter called the CBSE) since about last 43 years and even the past Land Use to institutional land by DDA under their collective wisdom and their expert decision before about more than 43 years, say about 50 years is not causing and even was not causing any present or past ecological imbalance. Moreover, change of land use from barren land to institutional land use cannot be said to have any nexus direct or indirect to the present land use of play field and more particularly when there is no damage to the ecological balance. If the past land use change into institutional land by DDA according to their collective wisdom and expert view and as per their policy and master plan which never caused any ecological imbalance will not give rise to any cause of action. Even otherwise restoration of a water body or pond was/is possible only where the pond was or is physically existing or is still restorable and where the pond as per the petitioner has been completely filled up decades ago say about more than 43 years or about 50 years, no restoration is possible and cannot be revived. This situation is fully covered by the law laid down in *Suo Moto Vs State Of Tamil Nadu (Ngt 2020)*. Even In the Case Law titled as *K.K. Roy vs State of West Bengal (NGT EZ Bench)*, it has been held that mere historical records of a pond if any that

existed 50 years ago do not give rise to a cause of action unless present physical harm or violation of environmental laws continues. In the present case there is also no physical harm and there was/is no violation of any environmental law since the last 43 years when the land was allotted to the respondent no. 8 i.e. the school.

Moreover, the applicant has not come to this Hon'ble Tribunal with clean hands and has suppressed material facts and is guilty of *suppressio veri* and *suggestio falsi* and is liable to be thrown out of the litigation in view of the settled law laid down by the Apex Court in the case reported as **AIR-1994 SC-853**, and the relevant portion is reproduced below: -

“...The Courts of law are meant for imparting justice between the parties. One, who comes to the Court, must come with clean hands. It can be said without hesitation that a person whose case is based on falsehood has no right to approach the Court. He can be summarily thrown out at any stage of the litigation...”.

16. That the applicant, fraudulently and dishonestly with intent to injure or put to fear of injury and annoy the answering respondent No.8-School and to attempt to extort benefit, valuable security or property, has filed the present application, which

he knows that the same is based on falsehood and the said O. A. therefore, is liable to be dismissed on this short ground alone.

17. That there is no cause of action against any respondent at all. Even if it arose in 1980 (though it is not admitted by the Respondent no.8) then the present OA is hopelessly time-barred under section 14 of the National Green Tribunal Act 2010 because since 1984 (post allotment period) the so-called Applicant-RWA which was not even in existence took 40 years (from 1984 to 2024) to approach this Hon'ble Tribunal. The present petition is liable to be dismissed in view of the judgement in *Union of India vs State of Gujarat (2020 SCC NGT 255)* where in it has been held that limitation is to be strictly governed by section 14 of the National Green Tribunal Act 2010 and delay beyond 60 days after six month period can not be condoned and even otherwise time starts from the 1<sup>st</sup> day when the applicant becomes aware of the environment damage or violation. In the present case no such damage or violation was/is there. The present petition /application is also fully covered by the judgement delivered on limitation in *Sukhdev Vihar RWA Vs State (NGT 2019)* wherein it has been held that the tribunal has no power to

condone delay beyond 60 days after six month and even PIL motives cannot override the strict limitation under The NGT Act 2010. The land of the playfield was developed after acquisition lawfully as per law applicable at that time and then converted into Institutional land use by DDA prior to its allotment to the respondent no 8 in the year 1984 as the land even if it was wet falsely called pond ceased to exist decades say about more than forty years ago then no public use or ecological value remained or remains. No ongoing environmental damage or continuing wrong is there. Hence the present O.A. is liable to be dismissed with cost.

**PARAWISE REPLY:**

1-3 That the contents of paragraphs 1 to 3 of the OA need no reply.

**REPLY TO FACTS IN BRIEF**

1. That the contents of paragraph 1 of the facts in brief are denied for want of knowledge, the applicant be put to strict proof of the averments made in the paragraph under reply. It is denied that the applicant has filed the present complaint in the public interest. It is wrong and denied that the present petition is filed by the duly authorized person. There is no mention of any resolution in favour of the person who has signed and got filed or has filed the present Original Application. It is wrong and denied

that the applicant is responsible for developing and /or providing healthy and conducive living environment to its members alleged or otherwise.

2-4. That the contents of paragraphs 2 to 4 of the facts in brief are wrong and are vehemently denied in entirety as though herein specifically set forth and traversed. It is vehemently denied that respondent school is violator or violated the rights of the applicant as guaranteed under Article 21 of the Constitution of India. It is respectfully submitted that the land to the respondent school was allotted about 44 years back by DDA after following the due process, even prior to promulgation of the provisions of The Environment Protection Act 1986. The land allotted to school is at an institutional Area, which is designated for institutions like Schools, Colleges, Temples, etc. & do not contradict to the nature of the Land & its land-use. Before the allotment of the Land in 1981, when the management of the school was looking for a land and moved an application with the DDA and after confirmation of allotment from DDA, the representatives of the respondent-school had visited the Institutional Area, where the land allotted, which was at the dead end of institutional Area, covered with boundary walls, uneven land, water logging at some portion with full of filth & garbage thrown by the resident neighbors. Therefore, it is absolutely wrong and denied that land allotted to the

respondent-school bearing any natural pond or passage was earmarked or reserved for the purpose of recreational/biodiversity park for the residents of the applicant association, as alleged or otherwise. The claim of RWA is false that the purpose of Recreational & Sports Complex was made for the residents of RWA because the Inauguration Stone laid by then Hon'ble Lieutenant Governor Late Shri. Jagmohan is located at Prasad Nagar, which comprises of DDA Flats (LIG & MIG), Prasad Nagar Lake, Prasad Nagar Institutional Area. The RWA is located in Karol Bagh Area which comes under Karol Bagh Constituency, whereas the Prasad Nagar Institutional Area / Prasad Nagar is under the constituency of Patel Nagar. Just because the RWA is a neighbor to this Institutional Area do not gives them a right to claim that it was developed for them. If so, then such examples will make other residents of our city to claim the development of the neighborhood. For example, the residents of Nizamuddin Area then may claim the Delhi Golf Club being developed for them as a neighborhood. Moreover, the inauguration stone do not clarify the size of the Recreational & Sports Complex as per the Annexure A/1 of OA. Also, DDA has developed a public GYM, which is mentioned as Park in the Layout Plan just at the backside of the inauguration stone.

5. That the contents of paragraph 5 of the facts in brief are wrong and are vehemently denied in entirety as though herein specifically set forth and traversed. It is vehemently denied that the DDA map for this area clearly has uploaded Zone-wise Layout Plan (LOP) in its website [www.dda.gov.in](http://www.dda.gov.in), under Planning, under Layout Plan, under Zone -wise Layout Plan, under Planning Zone B (Karol Bagh & City Extension), under Sub-Zone: B6 (Patel Nagar), under 41. Layout Plan for vacant land near Kalindi College Institutional Area (DDA's Plan). We get the Layout MAP for the institutional Area, where the map (uploaded in DDA website) clarifies two things, (1) There is no natural pond, (2) The map indicates a dead-end after the Faith Academy School which divides the RWA Area & Institutional Area as a separate region divided by a closed wall. Therefore, the claim of road being obstructed by the school is false. If the map (Annexure A/2 to OA) with the DDA Layout Plan Map is superimposed, it can be seen that the marking of POND written on the map with no demarcation of the said POND falls towards the region where part of Kalindi College Play Ground, Sai Dham Madir, Santoshi Mata Mandir & CS Institute are located, whereas the boundaries of Faith Academy School is way left. However, it can be clarified by Kalindi College only as the Annexure A/2 of OA is the Layout Plan for Kalindi College which is not clear. That paragraph 3 of the letter dated

17.09.1984 to DDA from the society of the school, inter-alia, clearly states that *“The slushy, unused, vacant area adjoining our land has no approach except through our land”*, meaning of slushy area can be muddy area, water logged area & cannot be termed as natural pond in any way, whereas the RWA is translating the word slushy as natural pond which is false. Similarly, the letter of Chief Planner and Commissioner (Planning), DDA, dated 26.09.1983, inter-alia, clearly states that *“there is unused portion behind this institute which we have shown for a park, unfortunately it is not accessible”*. Which clearly establish that (1) There is no pond behind the institute which is now a playground, (2) This place is inaccessible by neighborhood, which means there was no road.

6. That the contents of paragraph 6 of the facts in brief are wrong and are vehemently denied in entirety as though herein specifically set forth and traversed in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. It is vehemently denied that the blockage of the passage by the Faith Academy School has not only caused grave inconvenience to the residents of the applicant association but has also massively contributed to the most raised grievance/concern of Delhi NCR Region, which is the problem of vehicular congestion and resultant air pollution, as alleged or

otherwise. The claim of blockage of road by Faith Academy School is false as it did not exist as per records if the answering respondent. Moreover they have broken-open the wall & made unapproved passage which connects their colony with the main road (John L Dorsey Road) of the Institutional Area at one side and to various other roads of Karol Bagh area (please refer to the satellite image ) . As they have many accesses nearer to their colony from the other two sides, therefore the allegations of the applicant regarding causing grave inconvenience are false. It is respectfully submitted that the respondent school is not located in prominent places like India Gate, Lal Quila, Dhaula Kaun that in any way we can cause any restriction or congestion for traffic or air-pollution which may affect the entire Delhi NCR Region. In fact, the claim of RWA towards the saving of Fossil Fuel, Increase of Green House Gases in and around this area is totally baseless because they themselves are responsible for high-level of pollution in this area. The said residents of the colony, where RWA is located is running/leased out / rented their residential property to run Asia's Largest Cloth Market, famously known as Tank Road Jeans Market/Ready-made Garment Market, creating havoc of unnecessary traffic running through the institutional Area, where thousands of vehicles ( both commercial & personal ) come to the market causing high level of Air & Noise Pollution. ( Photographs of traffic,

market is annexed herewith and marked as **Annexure R-8/7**. It is submitted that even the claim of RWA as their concern towards the environment is also false because even if the President of the RWA or its members may say that they are not doing any commercial activity & It's being carried out by Tank Road Market Association but so far they have not made any complain or Court Case against the Tank Road Market known to us, which indicates the motive behind the RWA that their concern towards environment is selective & motivated with reason unknown after 40 years. The answering respondent most respectfully submits that the Faith Academy School has been known as one of the best schools, maintains its green area & winning several awards year after year for many years. Recently the school participated in the 67<sup>th</sup> Annual Flower Show 2025, conducted by University of Delhi like every year and won following prizes;

1. Best Rock Garden                      1 position
2. Best School Garden                    1 position
3. Best maintained Green Area of a Sr. Sec. School - 1 position

The respondent-school also has a Rain-Water Harvesting System & Solar Panels, which qualifies us to be termed as a Green School. Since, the environmental benefits of maintaining the best Green Area of the Delhi

city, as a school cannot be confined within the school, which means that our neighbors i.e. members of RWA are also benefited 24x7 because of the greenery maintained by the school.

7. That the contents of paragraph 7 of the facts in brief are wrong and are vehemently denied in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. It is submitted that the Respondent-School has never eroded/degraded the soil & cannot destroy the pond which never existed as per school records & the claim of RWA is false. Whereas, regular planting of seasonal plants, vegetation, Rain-Water Harvesting etc. is nourishing the soil and makes it fertile (photographs and rainwater harvesting certificated dated 01.06.2022 are annexed herewith and marked as **Annexure R8/8**. In fact, the Applicant is intentionally challenging only the respondent-school not the Kalindi College as the existence of POND is question is alleged by RWA on both Faith Academy School & Kalindi College, but the RWA is only indicating the Lease Deed of Faith Academy School, which again indicates the wrong motive of RWA unknown to us after 40 years.

8-9. That the contents of paragraphs 8 & 9 of the facts in brief are wrong and are vehemently denied in entirety as though herein specifically

set forth and traversed in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. The answering respondent is not aware of any such alleged communications as they were never addressed to or received by the answering respondent.

10. That the contents of paragraph 10 of the facts in brief are wrong and are vehemently denied in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. It is vehemently denied that the respondent School is violator or currently using the said piece of land bearing the natural pond (currently buried under the concrete, bearing water underneath) or have violated the covenant or clauses, forming part of the lease, as alleged or otherwise. The entire allegations are derogatory, sham, vague and baseless. The Respondent-School has not made any construction on the land made available to it as playground. The school building has been constructed in three phases with necessary approvals from MCD as per the approved Building Plans on the land available which is under Perpetual Lease but not on the temporary lease which is a playground.

11-12. That the contents of paragraphs 11 & 12 of the facts in brief are wrong and are vehemently denied in entirety as though herein specifically set forth and traversed in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. However, it is respectfully submitted that the matter relating to the Play Ground of the respondent-school is subjudice and as such the Applicant has no right to take any undue benefit of the subjudice matter.

13. That the contents of paragraph 13 of the facts in brief are wrong and are vehemently denied in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. It is vehemently denied that the school destructed the natural pond or has caused significant increase in the number of various health related issues in the Tank Road Anand Puri area, as alleged or otherwise. The allegations of the applicant regarding ground water depletion caused by the school are absolutely false because school has Rain-Water Harvesting System, properly maintained Green Area inside the school campus which is nourishing the soil and charging the ground water during rain. However, the members of RWA & the resident of the said colony area are residing in an area which was once termed as encroached

area. Their houses have been constructed without approved building plans, deviating all the municipal norms, specifically the narrow lanes & spread of concrete all over has left no space for the rain water to charge the ground level, causing accumulation of water in low-line area. Moreover, the unauthorized construction, unauthorized commercial activities in that area are defying all safety norms in terms of Structural Safety, Fire Safety & can cause risk to their own members lives in future. It is most pertinent to mention that Tank Road Market is included in the word's infamous markets.

14-16. That the contents of paragraphs 14 to 16 of the facts in brief are wrong and are vehemently denied in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. However, it is stated that the said publications pertaining to environmental damage are not all concerned with the respondent-School.

17. That the contents of paragraph 17 of the facts in brief are wrong and are vehemently denied in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. It is vehemently denied that the respondent-school encroached

upon the water bodies. It is submitted that the monitoring committee appointed by the Hon'ble National Green Tribunal has tagged 1040 water bodies in Delhi, as per the list the only lake marked in this area is known as "Prasad Nagar Lake/Jheel Park', managed by DDA in a proper manner, surrounded by municipal road & the same is not encroached by the school in any manner. The school is approximately 500 Mtrs away from the said lake.

18. That the contents of paragraph 18 of the facts in brief are wrong and are vehemently denied in entirety as though herein specifically set forth and traversed in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. It is vehemently denied that the respondent-school has completely shut the passage, which is resulting in congestion and traffic as alleged or otherwise.

19. That the contents of paragraph 19 of the facts in brief are wrong and are vehemently denied in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. It is respectfully submitted that the traffic problem is mainly due to the Commercial Activities running in the area & MCD parking

causing numerous traffic problem for which the respondent-school has also filed a case against the Parking Contractor in the Hon'ble High Court of Delhi for parking more than the sanction limit.

20. That the contents of paragraph 20 of the facts in brief are wrong and are vehemently denied in entirety as though herein in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. It is submitted that as per school record it does not exist, secondly for 40 years the RWA did not raised a concern for the said pond from 1981-to 2017, therefore, the allegations of the applicant in the paragraph under reply are totally false and frivolous.

21. That the contents of paragraph 21 of the facts in brief are wrong and are vehemently denied in entirety as though herein in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. It is denied that there is any destructive act or encroachment of the water (natural pond) by the respondent School which is causing immense “loose” to the residents of the Tank Road, Anand Puri Area, as alleged or otherwise.

**REPLY TO GROUNDS:**

(i)-(xix). That the Grounds (i) to (xix) of the O.A. are sham, false and frivolous and are denied in entirety and are not at all available to the applicant in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. It is denied that any act of the answering respondent No.8-School is contemptuous in nature, as alleged or otherwise. It is vehemently denied that the Respondent No.8-School has played mischief or has misrepresented the facts pertaining the land in question bearing natural pond or that the action of the respondent No.8-School is in contravention of the policies or vision of this Hon'ble Tribunal, as alleged or otherwise. It is emphatically denied that the respondent No.8-School caused irreparable damage to the environment or destroyed the ecosystem or topography of the land in question bearing natural pond/lake or that the Respondent No.8-School by its act felling of trees, soil erosion or "concatenation" of the land in question have caused major drop in ground water in the area leading to water scarcity, as alleged or otherwise. It is absolutely denied that the respondent No.8-School in one of its objections to the joint inspection report of the DDA has itself acknowledged the fact of the peculiar topography of the questioned land bearing natural pond/lake, as alleged or

otherwise. It is vehemently denied that the respondent No.8-school are in occupation/possession of the said piece of land bearing natural pond under temporary lease dated 16.04.1984, which obtained this leave on misrepresentation of facts or is already breached and have violated the various clause of this lease, as alleged or otherwise. In fact, the entire allegations of the applicant in this regard are contemptuous in nature as the matter is already subjudice before the Hon'ble High Court of Delhi and it is none of the business of the applicant to interfere in the administration of justice. The answering respondent No.8-School reserves its right to sue the applicant and its office-bearers, in this regard as and when it is so advised. It is stated that judgments cited by the applicant in these Grounds have been delivered on case-to-case basis and decision on one particular case cannot be taken as a precedence. Therefore, the said judgments quoted by the applicant cannot be treated as precedence for disposing of the present case. It is further submitted that irrespective of the above submissions of the respondent No.8-School, that each judgment is a good judgment for the facts of the case in which the said judgment is passed unless any specific new law has been coined or propagated by the Hon'ble Court. It is reiterated that the answering Respondent No.8-School

vide letter dated 17.09.1984 to DDA, inter-alia, clearly states that “*The slushy, unused, vacant area adjoining our land has no approach except through our land*”, meaning of slushy area can be muddy area, water logged area & cannot be termed as natural pond in any way, whereas the RWA is translating the word slushy as natural pond which is false. Similarly, the letter of Chief Planner and Commissioner (Planning), DDA, dated 26.09.1983, inter-alia, clearly states that “*there is unused portion behind this institute which we have shown for a park, unfortunately it is not accessible*” which clearly establish that (1) There is no pond behind the institute which is now a playground, (2) This place is inaccessible by neighborhood, which means there was no road.

22-24. That the contents of paragraphs 22 to 24 of the said OA, as alleged, are wrong and are vehemently denied in entirety as though herein in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity.

25. That the contents of paragraph 22 of the said OA, as alleged, are wrong and are denied. It is submitted that the instant complaint is most malafide and has been filed in gross misuse of the process of law and courts.

26. That the contents of paragraph 26 of the said OA, as alleged, are wrong and are denied in view of the detailed submissions made hereinabove, which kindly be read as part and parcel hereof for the sake of brevity. It is denied that cause of action is still continuing. It is submitted that the present O. A. is without any cause of action and is liable to be dismissed on this ground alone.

The prayer clauses of the O. A. are wrong and denied and the same are repudiated.

It is, therefore, submitted that the said O. A. may kindly be dismissed with costs, being misconceived, devoid of any merit and without any cause of action.

For FAITH ACADEMY

S. Robert

Hon. Manager

RESPONDENT NO.8-SCHOOL

THROUGH ITS AUTHORISED REPRESENTATIVE/MANAGER

MR. S. ROBERT

THROUGH



(M. QAYAM-UD-DIN & CO.)

ADVOCATES FOR RESPONDENT NO.8

CONSULTATION ROOM,

DELHI HIGH COURT, NEW DELHI-110003

MOB.9811030056

Email: [advocateqayamsaab@gmail.com](mailto:advocateqayamsaab@gmail.com)

NEW DELHI

DATED: 12.8.2025

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
AT NEW DELHI

O.A. NO. 1348 OF 2024

**IN THE MATTER OF:**

ANAND PURI GOVIND GARH TANK ROAD  
RESIDENTS WELFARE ASSOCIATION ... APPLICANT

VS

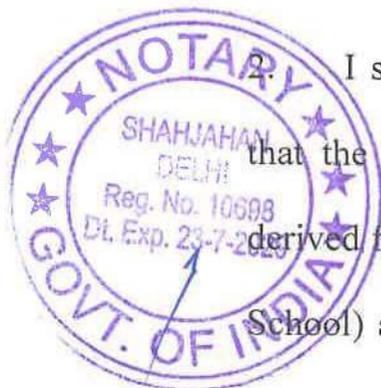
GOVT OF NCT OF DELHI AND ORS ... RESPONDENTS

**AFFIDAVIT**

I, S. Robert, aged about 78 years, son of Mr. R. L. Sebastian, Honorary Manager of the Faith Academy, at John L. Dorsey Road, Prasad Nagar, New Delhi do hereby solemnly affirm and declare as under: -

1. That I am Honorary Manager of Respondent No.8-School in the above noted matter. I am conversant with the facts and circumstances of the present case and in such capacity, competent and authorized to depose by way of this affidavit.

I say that I have gone through the accompanying reply and I say that the facts stated therein are true and correct to my knowledge as derived from the official record of the Faith Academy (Respondent No.8-School) and legal submissions are based upon the legal advice received



and believed by me to be true. Rest is submission before this Hon'ble Court.

3. The contents of the accompanying reply be read as part and parcel hereof for the sake of brevity.

For FAITH ACADEMY

S. Subash

Hon. Manager  
DEPONENT

VERIFICATION:

12 AUG 2025

Verified at New Delhi on this \_\_\_ day of August, 2025 that the contents of paragraphs 1 to 3 of my above affidavit are true and correct to my knowledge and belief. Nothing material has been concealed therefrom.

For FAITH ACADEMY

S. Subash

Hon. Manager  
DEPONENT

M. Qayam-ud-Din 12 AUG 2025

**M. QAYAM-UD-DIN**  
Advocate-On-Record  
SUPREME COURT OF INDIA  
Ch. No. 207, S-Block, Delhi High Court  
Lawyer's Chamber, New Delhi-110003  
M: 9811030056, advocateqayamsaab@gmail.com

I identify the Deponent who  
has signed in my Presence



CERTIFIED THAT THE DEPONENT  
has solemnly affirmed that the contents of the affidavit which he has sworn to are true and correct to the best of his knowledge and belief.  
47

Annexure R8/1



\$~25(1)

\* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

+ W.P.(C) 13732/2021 &amp; CM APPLS. 43393-94/2021

CHRISTIAN EDUCATIONAL SOCIETY C/O FAITH ACADEMY  
SR. SECONDARY SCHOOL ..... PetitionerThrough: Mr. C. Mohan Rao, Senior Advocate  
with Mr. L.B. Rai, Mr. Qyamuddin  
and Mr. Shivam Shukla, Advocates.

versus

DELHI DEVELOPMENT AUTHORITY &amp; ORS. .... Respondents

Through: Mr. Anupam Srivastava, ASC for  
GNCTD with Mr. Varun Mishra and  
Mr. Anupam Srivastava and Mr.  
Ujjwal Malhotra, Advocates for R-5.  
Ms. Saroj Bidawat, Senior Panel  
Counsel for R-6.  
Ms. Mrinalini Sen, Advocate  
Mr. M.A. Niyaz, Standing Counsel  
for R-7, CBSE.**CORAM:****HON'BLE MR. JUSTICE NAJMI WAZIRI****ORDER**% **03.12.2021**

The hearing has been conducted through hybrid mode (physical and virtual hearing).

1. The petitioner was allotted 7.5 acres of land for construction of a Higher Secondary School building @ Rs. 6,00,000/- per acre, with the annual ground rent of 2.5% per annum and an adjacent land admeasuring 0.95 acres on 26.04.1984 on a temporary lease basis on payment of annual rent @ Rs.1/- per annum. The temporary lease was executed on 30.11.1984; it was renewable on a yearly basis. The



ground rent for 0.95 acres of land was last paid on 07.01.2021, valid till 2022. The next payment is due in August, 2022. The said open land is being used as playground and for extracurricular activities, for thousands of children studying in the school for the past 35 years. The impugned order dated 17.11.2021 claims that the petitioner/School Society has enjoyed illegal possession of the playfield for the last 35 years, therefore, it is liable to pay charges for illegal possession of the land for the period beyond one year, the impugned order also seeks handing-over possession of the said land of the DDA.

2. Relying upon documents filed with the petition towards the payment of ground rent, the learned Senior Advocate for the petitioner further submits that the impugned order is contrary to the facts. A communication dated 12.04.1988 from DDA reads, *inter alia*, as under:

*“..... With reference to your letter NO. FA/Bldg./Plygrd./XXB/20 dated 22.3.88, on the above subject. I am directed to inform you that it is not necessary to execute the lease every year and temporary lease already executed for one year is to continue, subject to extending the same by mutual agreement. Accordingly, the lease has been extended for a period of 5 years from 17.8.84 to 16.8.89 subject to the terms and conditions laid down in the lease executed in 1984 on payment of usual rental as per lease. In future the lease will be executed on year to year basis and you are advised to make a request in this regard well in time....”*

3. In terms of the aforesaid advice, the petitioner has continued to seek



extension of the lease and has been paying the yearly ground rent. The acceptance of ground rent, is by itself an acknowledgment by the DDA that the lease continues. That being the position, he submits that the impugned order is arbitrary, unjustified and liable to be set aside. The learned Senior Advocate for the petitioner submits that school has attained a goodwill, which is proven by the fact that four thousand children are studying in the school.

4. The learned counsel for the DDA submits that the amount has been voluntarily deposited by the petitioner Society and not on a demand raised by the DDA. The petitioner submits that this is the manner in which the monies are deposited, there is no other way of paying the ground rent. Indeed, the aforesaid advice of DDA dated 12.04.1988 clearly bears this out, so does the consistent payment of ground rent. This practice is the only mode which was communicated to the petitioner and there was no objection raised by DDA at any stage for the last 35 years.
5. The learned Senior Advocate further submits that if the playground is taken away by DDA, it may not be able to comply with the requirement of the Central Board of Secondary Education and its recognition may be in jeopardy. He submits that the open land/playground is an essential requirement for the school.
6. *Prima facie*, the court is of the view, that in so far as the petitioner has done all that it was required to do, to be in lawful possession of the land, the aforesaid order would require to be looked into. Furthermore, the rights of the children for sports and games and extracurricular activities would be stopped if playground adjacent to



their school building is suddenly taken away, if they are deprived of the playfield. In view of the above, the impugned order dated 17.11.2021, shall be kept in abeyance. Let reply and rejoinder be filed within four weeks each.

7. List on 31.03.2022.

**DECEMBER 3, 2021/zp**

**NAJMI WAZIRI, J**



Annexure R8/2



S~10

\* **IN THE HIGH COURT OF DELHI AT NEW DELHI**  
 + **W.P.(C) 13732/2021**

CHRISTIAN EDUCATIONAL SOCIETY C/O FAITH ACADEMY  
 SR. SECONDARY SCHOOL ..... Petitioner

Through: Mr. V. Mohan Rao, Sr. Adv with Mr.  
 M. Qayam-Ud-Din and Ms. Smerity  
 Rani, Advs.

versus

DELHI DEVELOPMENT AUTHORITY & ORS. .... Respondents

Through: Mr. Sanjay Katyal, Standing Counsel  
 for DDA with Ms. Chand Chopra,  
 Adv.  
 Mr. Saroj Bridwal, Sr. Panel Counsel  
 for UOI.  
 Mr. M. A. Niyazi, Standing Counsel  
 for CBSE with Ms. Nehmat Sethi,  
 Advs.  
 Mr. Shantanu Parashar and Mr. Harsh  
 Trivedi, Advs for impleader.

**CORAM:**  
**HON'BLE MR. JUSTICE SUBRAMONIUM PRASAD**

**ORDER**

% **12.05.2022**  
**CM APPL. 16050/2022 (Exemption)**

Allowed, subject to all just exceptions.

**CM APPL. 16049/2022**

1. This is an application for impleadment by Anand Puri Govind Garh  
 Tank Road Residents Welfare Association. It is claimed that the order

W.P.(C) 13732/2021

Page 1 of 2



impugned in the writ petition was passed only on the complaint given by the Applicant and, therefore, the Applicant is a necessary and proper party to the instant proceedings.

2. Issue Notice.

3. Mr. Qayam-Ud-Din, learned counsel for the Petitioner, accepts notice and seeks time to file a reply.

4. Let the reply be filed before the next date of hearing.

5. The Applicant is directed to supply a copy of the application to all the co-Respondents.

6. List on 23.09.2022.

**W.P.(C) 13732/2021 & CM APPLs. 43393/2021 & 16052/2022**

7. Learned counsel for the DDA seeks time to file a reply contending that there are a number of questions on the fact which have to be looked into by the Officers.

8. Let the reply be filed within four weeks. Rejoinder thereto, if any, be filed within two weeks thereafter.

9. List on 23.09.2022.

**SUBRAMONIUM PRASAD, J**

**MAY 12, 2022**

*Rahul*

Annexure R8/3



S~42

\* **IN THE HIGH COURT OF DELHI AT NEW DELHI**  
 + W.P.(C) 13732/2021 and CM APPLs. 43393/2021, 16052/2022

CHRISTIAN EDUCATIONAL SOCIETY C/O FAITH  
 ACADEMY SR. SECONDARY SCHOOL ..... Petitioner

Through: Mr. C. Mohan Rao, Sr. Adv. along  
 with M. Qayam-ud-Din and Ms.  
 Smerity Rani, Adv.

versus

DELHI DEVELOPMENT AUTHORITY & ORS. .... Respondents

Through: Mr. Sanjay Katyal, SC along with Ms.  
 Chand Chopra, Mr. Siddharth  
 Shekhar, Mr. Adwaith Sreekumar and  
 Mr. Nihal Singh, Adv. for R-1/DDA.  
 Mr. Shantanu Parashar, Adv. for  
 impleader.  
 Mr. Anupam Srivastava, ASC along  
 with Mr. Vasuh Mishra, Adv. for R-5.  
 Mr. M.A. Niyazi, AR along with Mr.  
 Arquam Ali and Ms. Nehmat Sethi,  
 Adv. for R-7/CBSE.

**CORAM:**  
**HON'BLE MR. JUSTICE SACHIN DATTA**

**ORDER**  
**23.09.2022**

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**CM APPL. 16049/2022**

The applicant is directed to supply a copy of the application to the non-applicants within 4 days. Let reply be filed within a period of four weeks thereafter. Rejoinder thereto, if any, be filed before the next date of hearing.

List on 21.03.2023.



**W.P.(C) 13732/2021 and CM APPLs. 43393/2021, 16052/2022**

Last opportunity is granted to the DDA to file its reply. Let the same be filed within a period of four weeks from today. Rejoinder thereto, if any, be filed before the next date of hearing.

List on 21.03.2023.

Interim order to continue.

**SACHIN DATTA, J**

**SEPTEMBER 23, 2022/cl**

Annexure R8/4



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**IN THE HIGH COURT OF DELHI AT NEW DELHI**  
**W.P.(C) 13732/2021 & CM Appls.43393/2021, 16049/2022 and**  
**16052/2022**

CHRISTIAN EDUCATIONAL SOCIETY C/O FAITH ACADEMY  
 SR. SECONDARY SCHOOL ..... Petitioner

Through: Mr. C. Mohan Rao, Sr. Adv. along  
 with Mr. Quayam-ud-din and Mr.  
 N.S. Bakshi, Advs.

versus

DELHI DEVELOPMENT AUTHORITY & ORS..... Respondents

Through: Mr. Sanjay Katyal, SC along with Ms.  
 Chand Chopra, and Mr. Nihal Singh,  
 Advs. for R-1/DDA.

Mr. Shantanu Parashar, Mr. Harsh  
 Trivedi and Mr. Shaurya Chourasiya,  
 Advs. for impleader.

Mr. Anupam Srivastava, ASC  
 GNCTD with Mr. Vasuh Misra, Adv.  
 for R-5.

Mr. M.A. Niyazi, SC with Ms.  
 Anamika Ghai Niyazi and Mr.  
 Arquam Ali, Advs. for R-7.

**CORAM:****HON'BLE MS. JUSTICE TARA VITASTA GANJU****ORDER****08.11.2023**

%

**[Physical Hearing/Hybrid Hearing (as per request)]****CM Appl.16049/2022/Application seeking impleadment]**

1. Notice in the present Application was issued on 12.05.2022.
2. Learned Senior Counsel who appears on behalf of the Petitioner submits that the Petitioner has filed a Reply to the present Application.
3. Learned Counsel who appears on behalf of the Applicant/impleader submits that he has not received a copy of the Reply.

W.P.(C) 13732/2021

page 1 of 3



4. Let a copy of the Reply be supplied to learned Counsel for the Applicant/impleader within two days under acknowledgment.
5. Rejoinder, if any, be filed before the next date of hearing.
6. List before the concerned Registrar for completion of pleadings on 17.01.2024.

**W.P.(C) 13732/2021 & CM Appls. 43393/2021 [Application for stay] and 16052/2022 [Application seeking vacation of the Interim Order]**

7. Learned Counsel for Respondent No.5 submits that he does not wish to file Counter-Affidavit/short affidavit in the matter. The statement of learned Counsel is taken on record.
8. Learned Counsel for Respondent No.6 submits that she wishes to file a Counter-Affidavit/short affidavit in the matter.
  - 8.1 Let the needful be done within three weeks, failing which, the Counter-Affidavit/short affidavit be taken on record subject to the payment of costs of Rs.5,000/- payable directly to "Delhi High Court Legal Services Committee". If delayed, proof of cost shall be attached along with the Counter-Affidavit/short affidavit.
9. Learned Senior Counsel for the Petitioner submits that Rejoinder to the Counter-Affidavit filed by Respondent Nos. 1 to 4 has been filed. The same is, however, not on record.
  - 9.1 On steps being taken, let the same be placed on record.
10. Rejoinder, if any, be filed before the next date of hearing.
11. List the matter before the concerned Registrar for completion of pleadings on 17.01.2024.
12. List the matter before the Court on 07.03.2024.

W.P.(C) 13732/2021

page 2 of 3



13. Interim order/directions granted by this Court to continue in the meantime.

**NOVEMBER 8, 2023/r**

*W.P.(C) 13732/2021*

**TARA VITASTA GANJU, J**

*[Click here to check corrigendum, if any](#)*  
*page 3 of 3*



Annexure R8/5  
Annexure R8/5



\$~56(1)

\* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

+ W.P.(C) 14561/2021 & CM APPL. 45871/2021

FAITH ACADEMY

..... Petitioner

Through: Mr. J.S. Bakshi, Senior Advocate  
with Mr. M. Qayam-ud-din and Mr.  
Abhishek Mohan Sinha, Advocates.

versus

DELHI DEVELOPMENT AUTHORITY & ORS. .... Respondents

Through: Mr. Sanjay Katyal, SC for DDA.

**CORAM:**

**HON'BLE MR. JUSTICE NAJMI WAZIRI**

**ORDER**

% **17.12.2021**

The hearing has been conducted through hybrid mode (physical and virtual hearing).

CM APPL. 45872/2021 (Exemption)

1. Allowed, subject to all just exceptions.
2. The application stands disposed-off.

W.P.(C) 14561/2021 & CM APPL. 45871/2021

3. In terms of this court's directions dated 17.12.2020 in W.P.(C) 10532/2020, the Delhi Development Authority was to dispose of the petitioners objection to the measurement of the land concerned. An order has been passed in this regard.
4. The learned Senior Advocate for the petitioner submits that it is not a speaking order.
5. Issue notice. The learned counsel named above accepts notice on



behalf of the respondents.

6. Reply and rejoinder, if any, be filed in four weeks each, successively.
7. List on 31.03.2022.
8. Till the next date of hearing, no precipitate steps shall be taken against the petitioner in terms of the impugned order dated 17.11.2021.

**NAJMI WAZIRI, J**

**DECEMBER 17, 2021**  
SS



Annexure R8/6



\$~27

\* **IN THE HIGH COURT OF DELHI AT NEW DELHI**  
 + **W.P.(C) 14561/2021 & CM Appl. 45871/2021**

**FAITH ACADEMY** ..... Petitioner

Through: Mr. J.S. Bakshi, Sr. Adv. along with  
 Mr. Quayam-ud-din and Mr. N.S.  
 Bakshi, Adv.

versus

**DELHI DEVELOPMENT AUTHORITY & ORS.....** Respondents

Through: Mr. Sanjay Katyal, SC along with Ms.  
 Chand Chopra, and Mr. Nihal Singh,  
 Adv. for R-1/DDA.

**CORAM:**

**HON'BLE MS. JUSTICE TARA VITASTA GANJU**

**ORDER**

**08.11.2023**

%

**[Physical Hearing/Hybrid Hearing (as per request)]**

1. Learned Senior Counsel who appears on behalf of the Petitioner seeks and is granted four weeks' time to file a Rejoinder in the matter.
2. List the matter along with W.P.(C)13732/2021 before the concerned Registrar for completion of pleadings on 17.01.2024.
- 2.1 List the matter before the Court on 07.03.2024.
3. In the meantime, Interim Order dated 17.12.2021 is made absolute during the pendency of the Writ Petition.
- 3.1 CM Appl.45871/2021 is accordingly closed.

**TARA VITASTA GANJU, J**

**NOVEMBER 8, 2023/r**

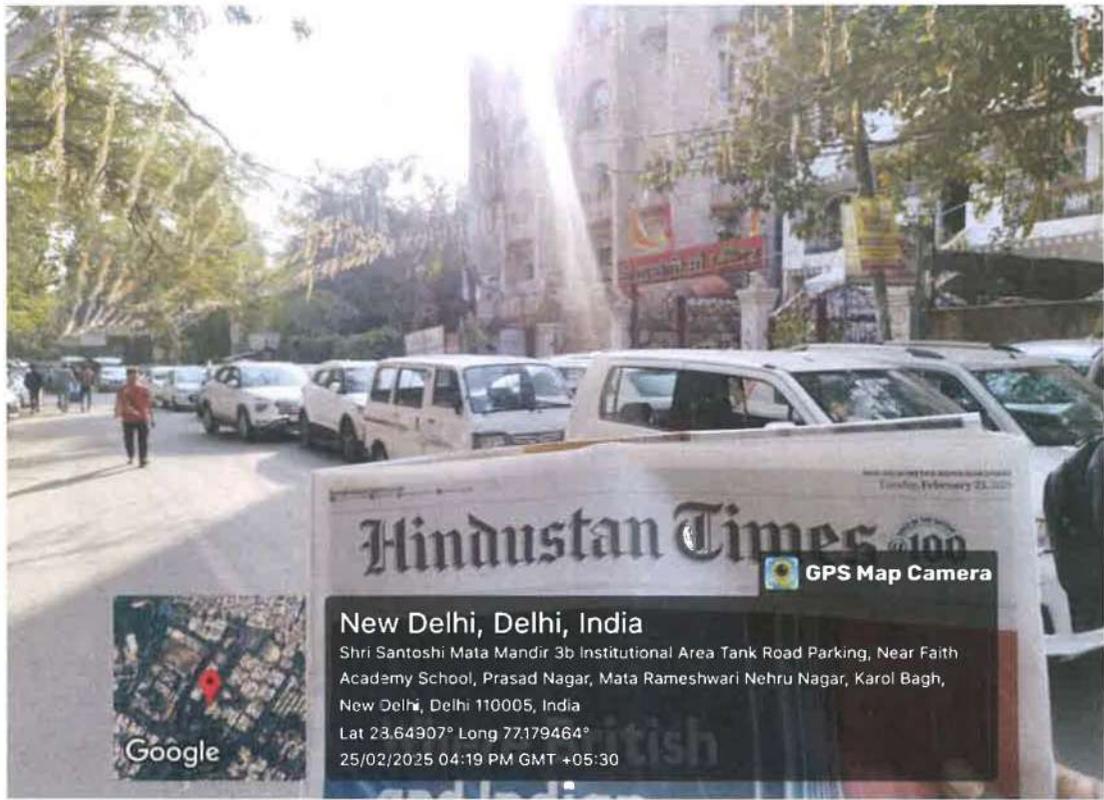
*Click here to check corrigendum, if any*

Annexure R8/7

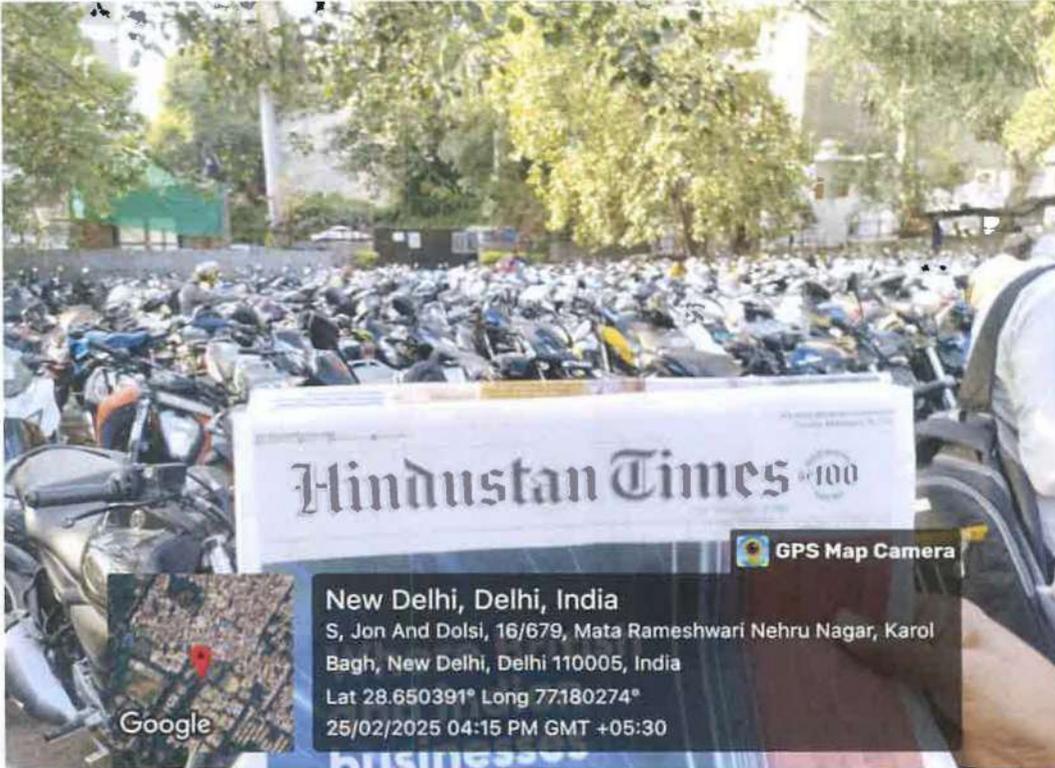
Photographs of Traffic outside the Faith Academy School within 100 Mtrs from the School Gates



Cars parked by the MCD Contractor on the footpath.



Half side of the road has been encroached by parking on the Road leading to School.



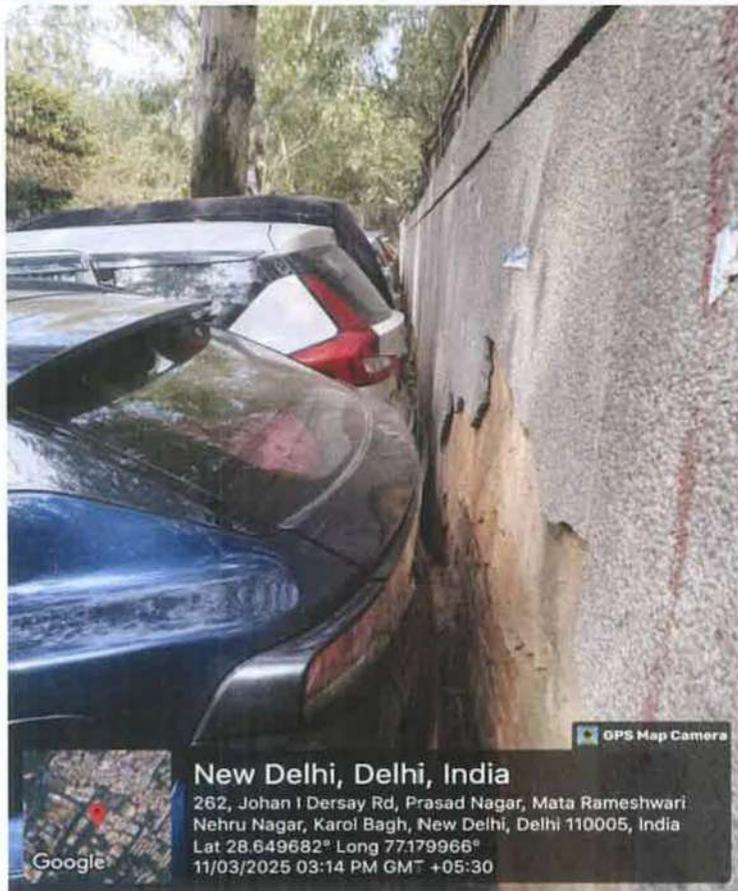
More than 500 bikes are parked in front of main gate of the school.





Congestion on the road due to excessive numbers of vehicles being parked.

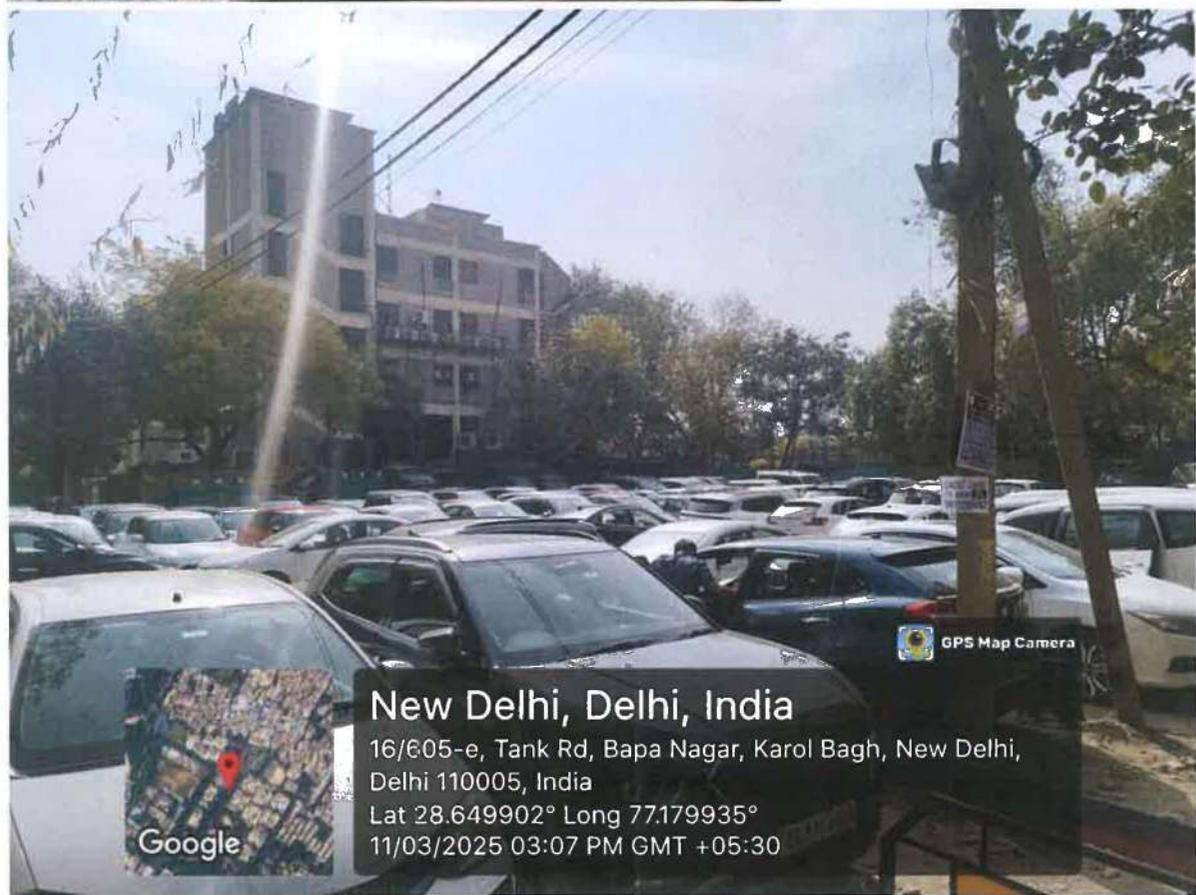




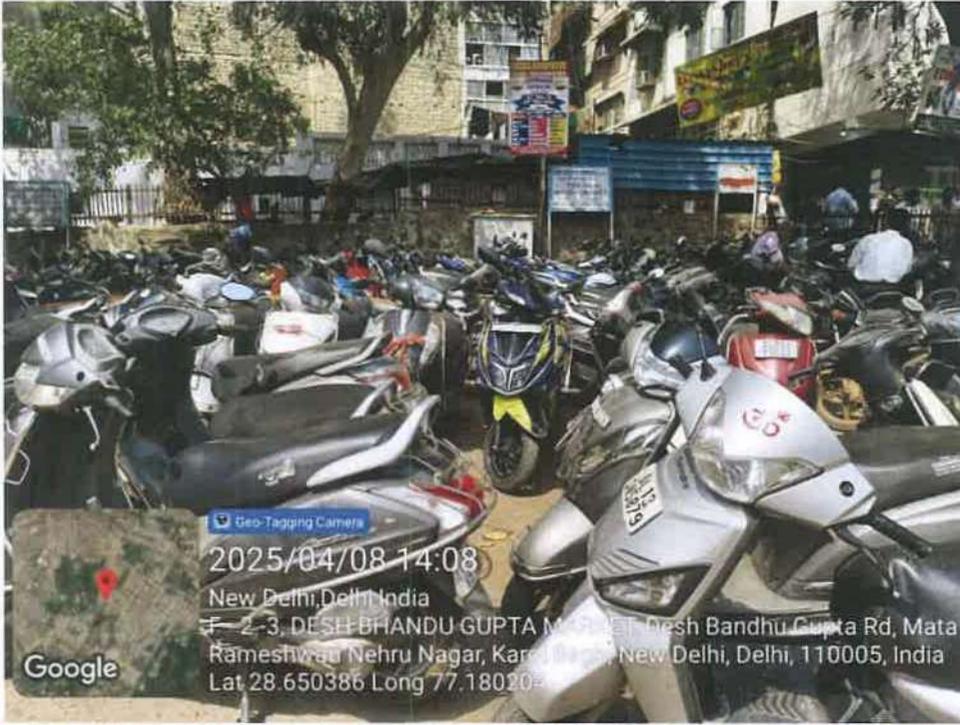
Cars parked over the footpath



Cars parked over the footpath

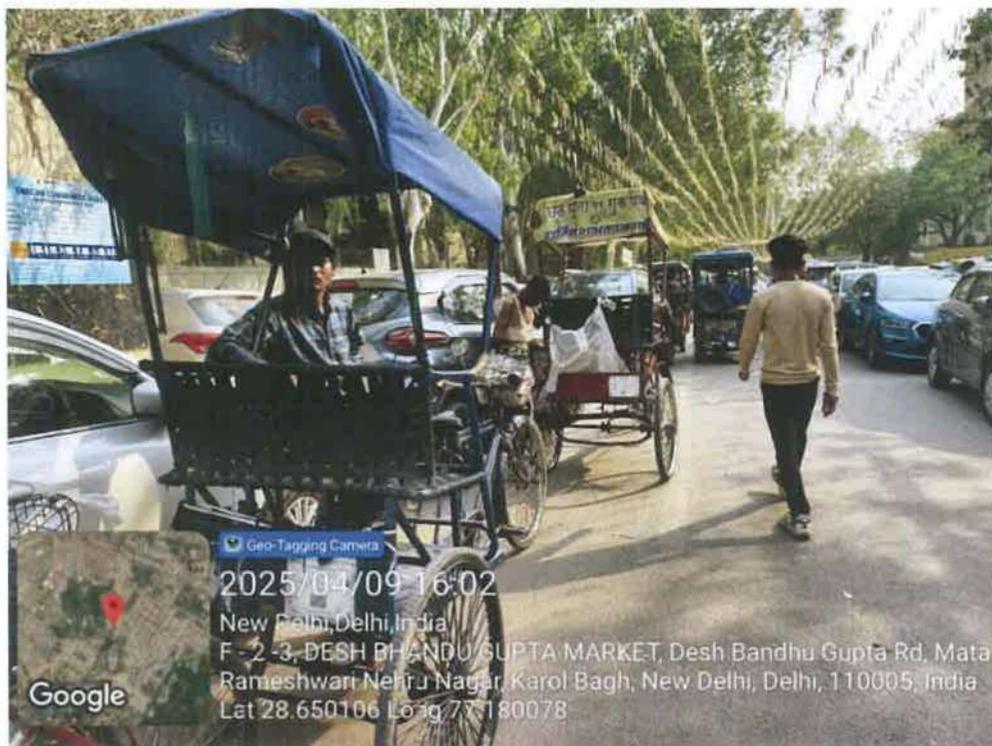


**New Delhi, Delhi, India**  
16/605-e, Tank Rd, Bapa Nagar, Karol Bagh, New Delhi, Delhi 110005, India  
Lat 28.649902° Long 77.179935°  
11/03/2025 03:07 PM GMT +05:30



Entrance to the Commercial Market in RWA Colony in front of the school



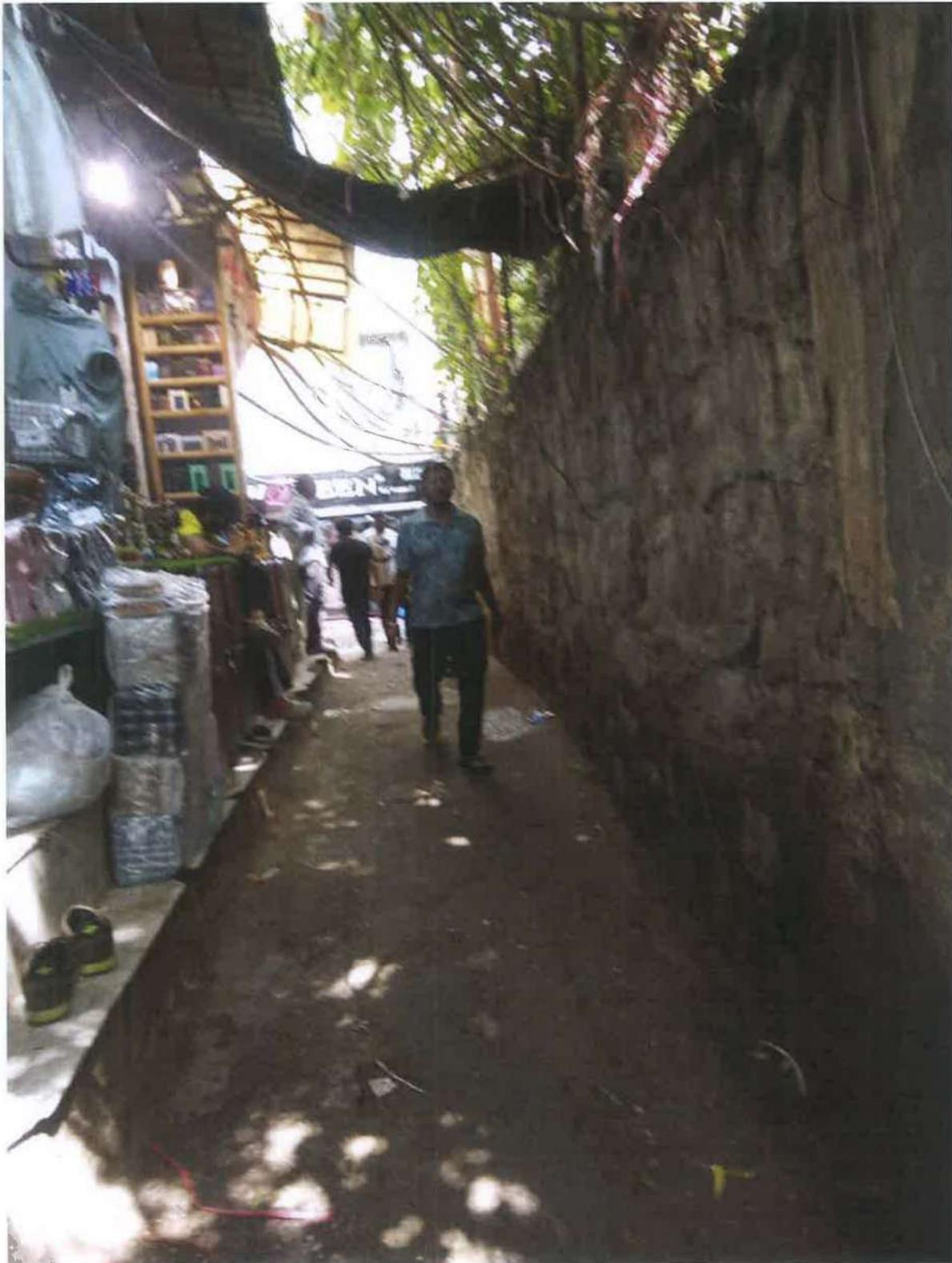


Date: 15.04.2025

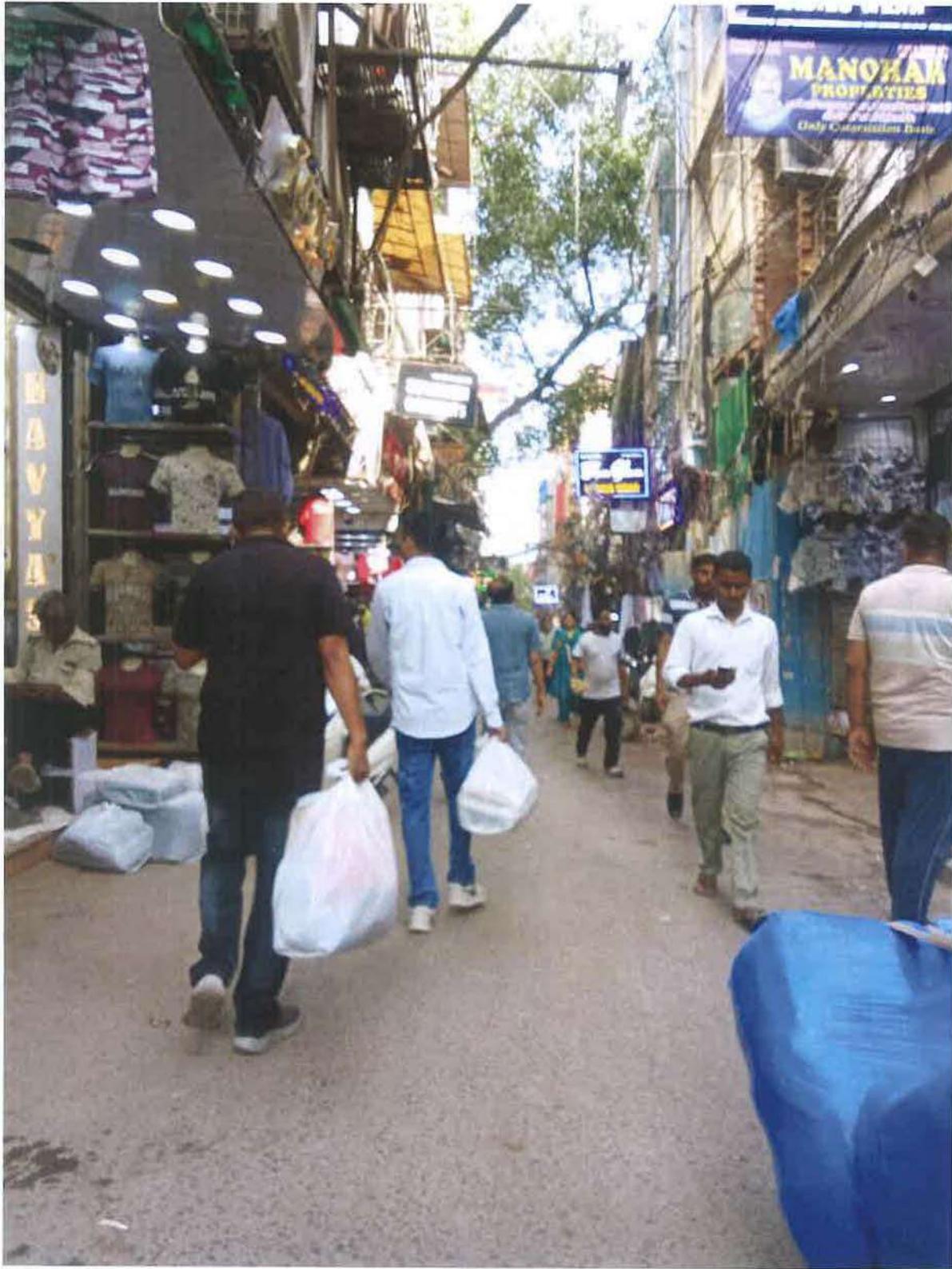




**Photographs of Tank Road Jeans Market running inside the RWA Colony (Bapa Nagar, Tank Road).**















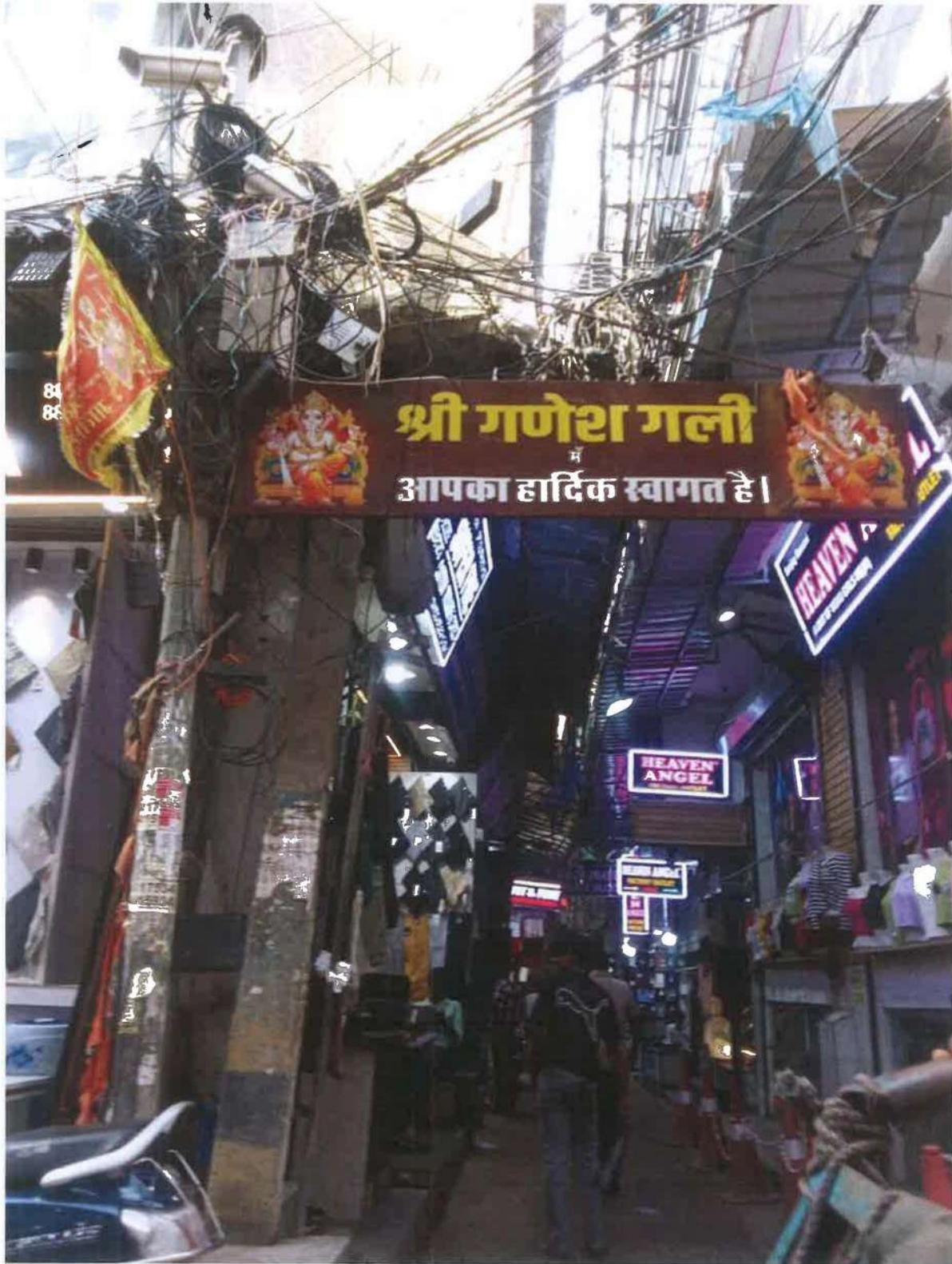






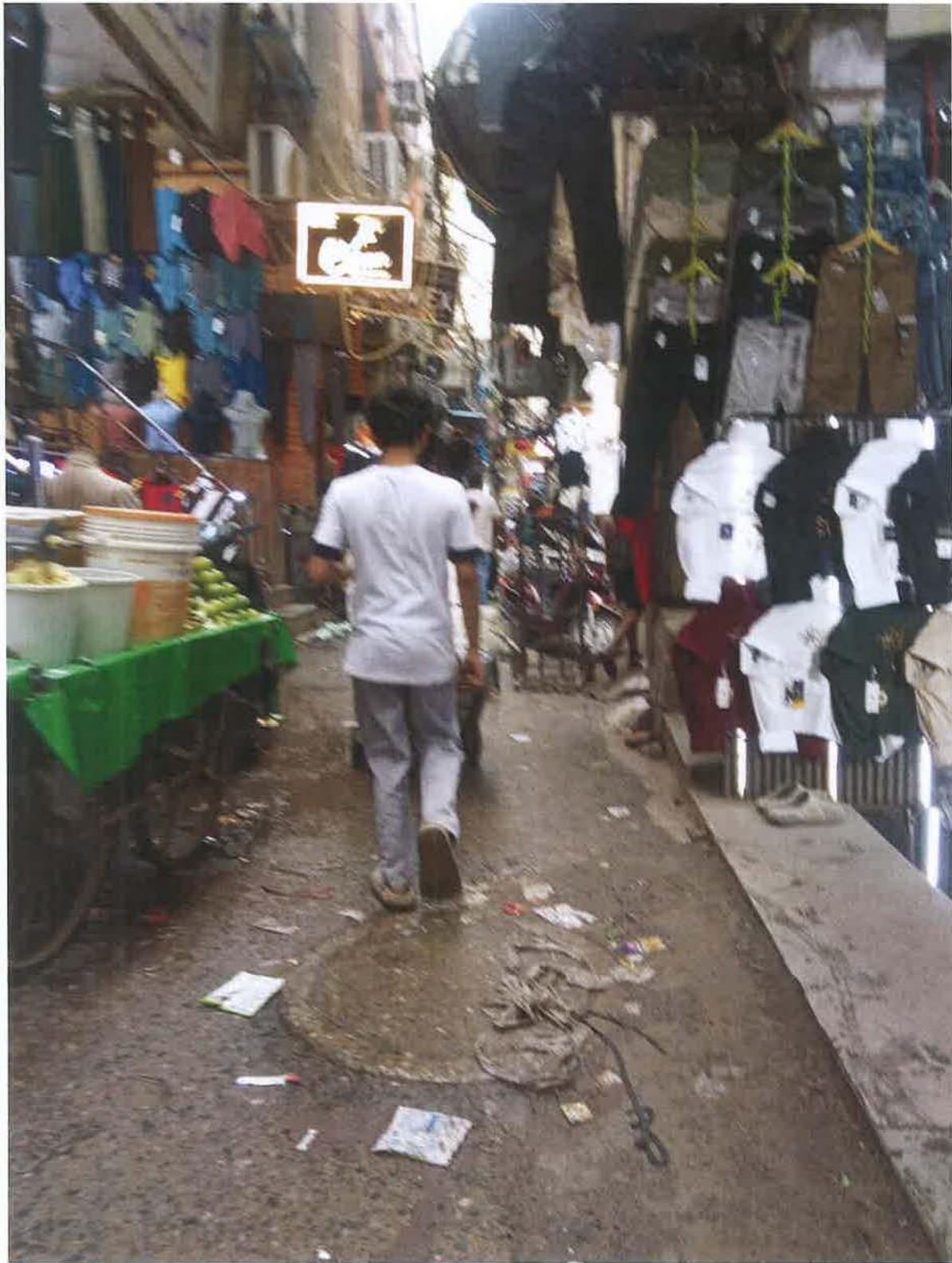










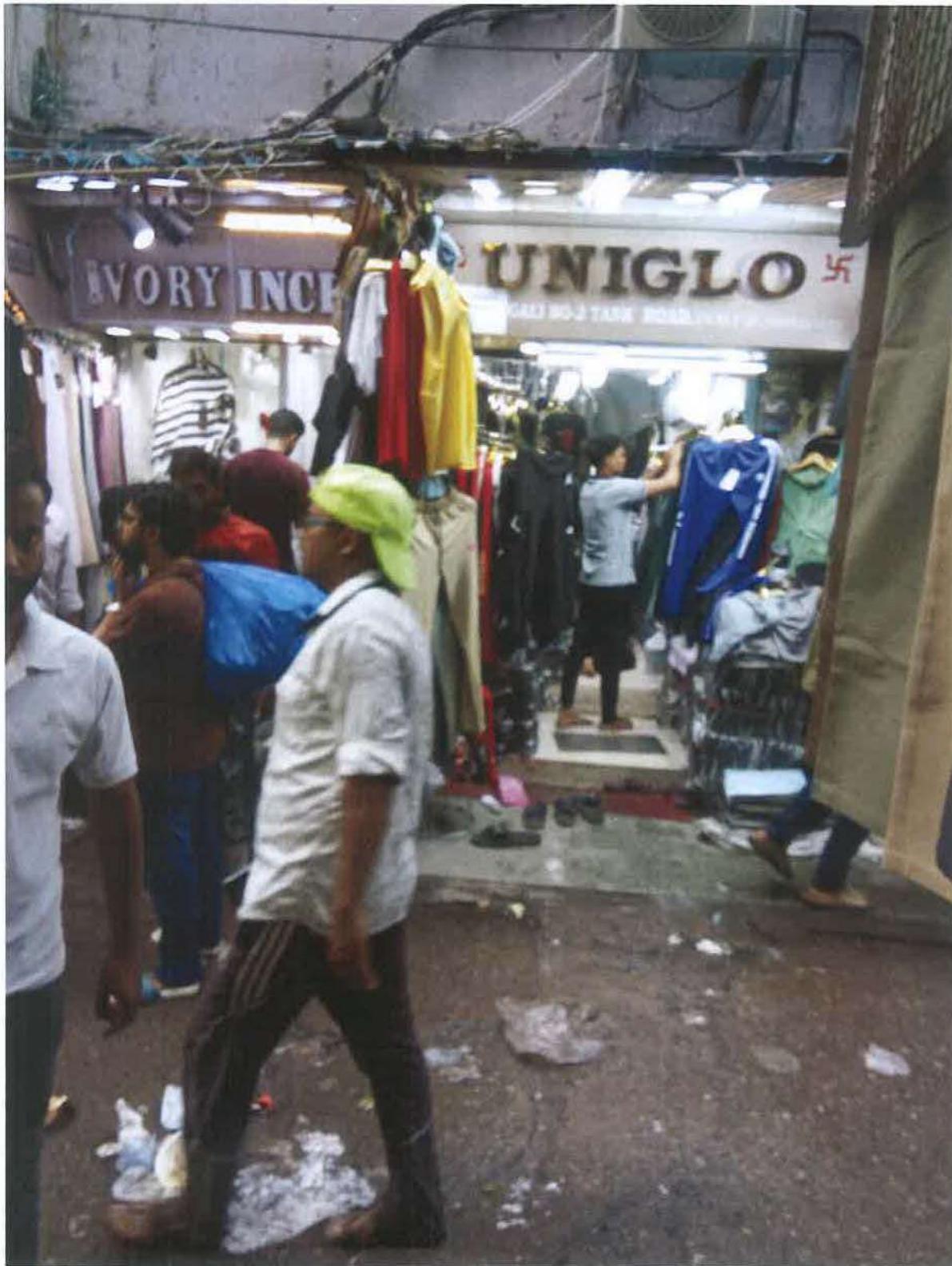












*Annexure R-8/8*

Green Area Developed inside the Faith Academy School with Rain Water Harvesting Facility

















**M DZINE**  
ARCHITECTS



**ARCHITECTS, INTERIOR DESIGNING, TURNKEY SOLUTION**

Ref No:-233

Dated:-01-06-2022

**RAINWATER HARVESTING CERTIFICATE**

Rainwater harvesting certificate in respect of Faith Academy and Faith Academy Second Shift (Phase 1, 2 & 3) situated at John L. Dorsey road, Prasad Nagar, New Delhi-110005 of 2.45 Acre land area measuring = 9914.79 meters.

Certified that the existing building plans have been submitted. The site has been inspected and we found that the rainwater harvesting system made by the school is in satisfactory condition. The provision has been made for the discharge of water.

The information given therein is factually correct to the best of our knowledge and understanding

ARCHITECT

(SIGNATURE WITH STAMP)

**GARIMA SINGH**  
CA/2017/87630

PLOT NO. 197, BASEMENT FLOOR, DDA SITE-1, NEW RAJINDER NAGAR, BEHIND SHANKAR ROAD FIRE STATION,  
NEW DELHI-110060 (INDIA)

Email : mdzinearchitects@gmail.com, Tel. 011 - 47539500

# Council of Architecture

## Certificate of Registration

This is to certify that the name of

Ms. Garima Singh

has been entered in the register and her Registration No. is

CA/2017/87630

This certificate is valid from the twelfth

day of December 2017 to the thirty-first

day of December 2018 inclusive.

List of Additional Qualifications:

*ONLY FOR RAINWATER HARVESTING CERTIFICATE  
FOR FAITH ACADEMY SITUATED AT JOHN L. DORSEY  
ROAD, PRASAD NAWAR, NEW DELHI-110005.*

Renewals

Valid Upto

31.12.2019

31.12.2020

31.12.2021

31.12.2022

Signature of Registrar

*[Handwritten signatures and dates: 8-1-19, 16-1-19, 17-1-19, 6-1-22]*

Given under the common Seal of the Council of Architecture.

*[Signature]*  
GARIMA SINGH  
CA/2017/87630



this twelfth day of December 2017

*[Signature]*  
Secretary

*[Signature]*  
President

This Certificate of Registration is issued under sub-section (7) of Section 24 and sub-section (4) of Section 28 of the Architects Act, 1972, enacted by the Parliament of India



# UNIVERSITY OF DELHI

## 67<sup>th</sup> Annual Flower Show 2025

This is to certify that The Principal, Faith Academy  
has been awarded the following Prize/Cup/Trophy on the occasion of  
the 67<sup>th</sup> Annual Flower Show.

Category	Class	Section	Prize/Cup/Trophy
A	VIII	-	I The Department of history cup
	X	-	I The Garden committee cup
	XIV		I The Pratibha V Arya cup
C	XII	2	I
		4	II
		5	II
		6	I

*Rajan Kapoor*  
(Prof. Rajan Kapoor)  
**Chairperson**

**Garden Committee**

*Rajni Abbi*  
(Prof. Rajni Abbi)

**Chairperson**  
**Flower Show**



# UNIVERSITY OF DELHI



Flower Show Committee

and

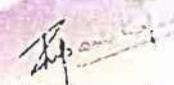
School of Open Learning

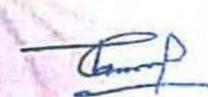
## 66<sup>th</sup> Annual Flower Show 2024

This is to certify that The Principal, Faith Academy  
has been awarded the following Prize/Cup/Trophy on the occasion of the  
66<sup>th</sup> Annual Flower Show.

Category	Class	Section	Prize/Cup/Trophy
C	XII	1	III The Delhi School of Social Work Cup
C	XII	2	I
C	XII	4	I
C	XII	5	I The Kalindi College trophoe
C	XII	6	III
A	VIII		I The Department of History Cup
A	X		I Garden Committee Cup
A	XIV		I The Pratibha V. Ayya Cup

  
Chairperson  
Flower Show

  
Secretary  
Garden Committee

  
Director  
Campus of Open Learning



62<sup>nd</sup> Annual Flower Show  
UNIVERSITY OF DELHI



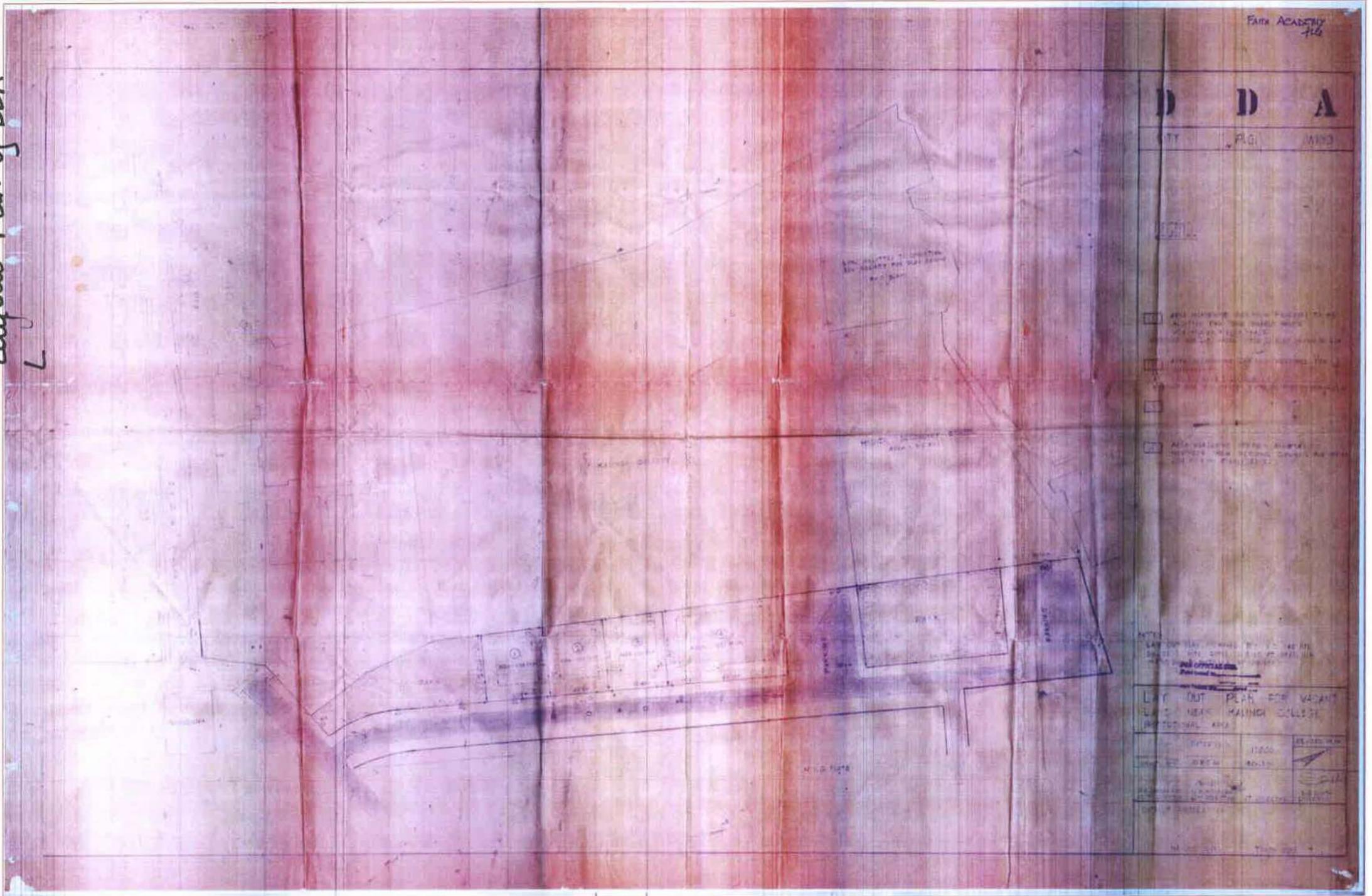
This is to certify that The Principal, Faith Academy  
has been awarded the following Prizes / Cups / Trophies at the 62<sup>nd</sup> Annual  
Flower Show held on 28<sup>th</sup> February 2020.

Category	Class	Section	Prize / Cup / Trophy
A	B		II
	X		I The Garden Committee Cup
	XIV		II
	XII	1	III
		2	I
		3	II
A	III	10	HC
	I	20	III

Secretary  
Garden committee

Dr. Balam Prasad  
Joint Secretary  
Garden committee

Layout Plan of DDA



### Solar Panels at Faith Academy School









**VAKALATNAMA**

Hon'ble  
IN THE COURT OF **National Green Tribunal At New Delhi**  
IN THE MATTER OF..... **O. A. NO. 1348/2024**..... PET

**Aanand Puri Govind Grah Tank Road Resident Welfare Association** Versus **Govt. of NCT of Delhi & ors.**

KNOW ALL to whom these present shall come that I/we, **S. Robert, Hony. Manager** of **Faith Academy, Prasad Nagar Delhi 110005** the above named **Respondent - 8**

hereby appoint.

**M. QAYAM-UD- DIN, Advocate**  
B.Sc., L.L.B., Parliamentary Fellowship of ICPS,  
(REG, No. D-209/1988)  
Ph.011-23382279,

**(D/1190/2025) UNZILA FATIMA ADVOCATE**  
& **Afsar Nabi ADVOCATE (Reg. D/1190/25)**  
B.Sc., LLB. Ph. No. 926 493 016 4  
(REG, No. D- 532A/06 )  
Mbl.. 9873818668

**CONSULTATION ROOM , HIGH COURT OF DELHI, LAWYERS CHAMBER BLOCK-1 ,NEW DELDI-110003, Ph.011-23382279, 9811030056**

(herein after called the advocate/s) to be my/our Advocate in the above-noted case authorize them:-To act, appear and plead in the above -noted cause in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each court by me/us.

To sign, file, verify and present pleadings, appeals, cross-objections or petitions for execution review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subjects to payment of fees for each stage.

To file and take back documents, to admit and/or deny the documents of opposite party.

To withdraw or compromise the said case or submit to arbitration any difference or disputes that may arise touching or in any manner relating to the said case.

To take execution proceedings

The deposit, draw and receive money, cheque/s, cash and grant receipts hereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.

To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf.

And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and purposes.

And I/We undertaken that I/We or my/our duly authorized agent would appear in Court on all hearings and will inform the Advocate for appearance when the case the case is called.

And I/We undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said cause. The adjournment costs whenever ordered by the Court shall be of the Advocate, which he shall receive and retain for himself.

AND in case any dispute of any nature whatsoever arises between the parties hereto i.e. the Advocate (s) and the client(s), the same shall be referred to sole arbitrator to be appointed by the Advocate only mentioned herein for arbitration as per law applicable, in Delhi

And I/We the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution on the said case until the same is paid up. The fee settled is only for the above case and above Court. I/We hereby agree that once the fee is paid, I/We will not be entitled for the refund of the same in any cause whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.

IN WITNESS WHERE OF I/We do hereunto set my/our hand to these presents the contents of which have been under stood by me/us on this **27th day of March 2025** For **FAITH ACADEMY**  
Accepted subject to the terms of the fees.

*[Signature]*  
Advocate

*[Signature]*  
Client

*[Signature]* UNZILA FATIMA ADVOCATE  
*[Signature]* S. Robert  
Hon. Manager  
Client

9811030056

**M. QAYAM-UD-DIN (Advocate)**  
D-209/88  
HIGH COURT OF DELHI  
Consultation Room, High Court  
Lawyers Chamber Block-1  
New Delhi-110003

*[Signature]*  
*[Signature]*  
*[Signature]*



## Proof of advance service

93

M Qayam Ud Din &lt;advocateqayamsaab@gmail.com&gt;

**COPY OF REPLY ON BEHALF OF FAITH ACADEMY RESPONDENT NO. 8 IN O.A. NO 1348 OF 2024 BEFORE NGT, AS ADVANCE SERVICE**

1 message

M Qayam Ud Din &lt;advocateqayamsaab@gmail.com&gt;

Tue, Aug 12, 2025 at 6:57 PM

To: "advvinay10@gmail.com" &lt;advvinay10@gmail.com&gt;, "sansar.kumar2018@gmail.com" &lt;sansar.kumar2018@gmail.com&gt;

"advvinay10@gmail.com" &lt;advvinay10@gmail.com&gt;

"sansar.kumar2018@gmail.com" &lt;sansar.kumar2018@gmail.com&gt;

Sir(s),

please find enclosed herewith advance service of copy of REPLY ON BEHALF OF FAITH ACADEMY RESPONDENT NO. 8 IN O.A. NO 1348 OF 2024 BEFORE NGT, AS ADVANCE SERVICE containing 93 pages including proof of advance service through e-mail.

REGARDS

(M.Qayam-ud-din)

Advocate

M Qayam Ud Din &amp; Co.

Supreme Court of India &amp; Delhi High Court

&amp; courts at States of India

(Mob.09811030056)

(011-23382279)

advocateqayamsaab@gmail.com

*Any dispute and all disputes of any nature whatsoever between the parties hereto including all disputes related to the documents attached hereto or referred hereto or herein or related to subject matter of this e-mail or e-mails related hereto even after expiry of the contracts or agreements or documents referred herein or hereto shall be referred to the sole arbitrator to be appointed by Mr. M. Qayam -Ud-Din, Advocate(D-209/88) for Arbitration at Delhi, India only*



faith academy REPLY in NGT by respondent no. 8 in OA No 1348 of 2024.pdf

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