

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

O.A. No. 1052/ 2024

In the matter of:

Kundan Veer Singh Bhullar & Others

...Applicant

Vs

Union Of India & Others

...Respondents

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Filed By:

Date: 19.11.2024

Place: Gurugram



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**REPLY ON BEHALF OF RESPONDENT NO. 3 THROUGH
NIJESH KUMAR, EXECUTIVE ENGINEER-SBM, MUNICIPAL
CORPORATION GURUGRAM.**

MOST RESPECTFULLY SHOWETH:

1. That present reply is being filed by Nijesh Kumar, Executive-Engineer-SBM, Municipal Corporation Gurugram (Respondent No.3) who is authorised to file reply on behalf of Respondent No.3.
2. That the above subjected Complaint/OA has been filed by applicants stated to be residents of Central Park 1 Condominium- Gurgaon, Greater Kailash-New Delhi and Baliawash Sector 45- Gurgaon alleging Municipal Corporation of Gurugram's Plan to dump construction and



demolition waste in an area in the village's green belt. It has been further alleged that aggrieved by the same and the continuing construction of the sewage treatment plant which would cause severe damage to the surrounding areas specially by leaching in the eco-sensitive zone, the present application is being filed.

3. That present reply is being filed responding to false allegations of plan to dump C&D waste and construction of sewage treatment plant. It is further submitted that liberty is being craved to file additional reply as and when required, with the permission of this Hon'ble Tribunal.
4. AT the outset, it is denied that it is plan of answering respondent to setup any site for dumping of C&D waste on the land near the water bodies of village Balola, District Gurugram. It is also denied that any sewage treatment plant is being constructed on the land in question.
5. That it is relevant to mention here that under 'Solid Waste Environment Exigency Program' in Gurugram to lift the road side waste, the C&D waste was also lifted from road sides, by the agency hired by answering respondent. During this process, C&D waste was also lifted from the areas nearby the land in question which is under ownership of the answering respondent. The waste was collected on the said land on 14.07.2024 and 15.07.2024, thereafter, same was

shifted to C & D waste processing facility at village Basai for processing of waste. It is humbly submitted that land in question used for temporary collection is not adjacent to any water body as alleged.


6. That it is not planned to transported and collect the C&D waste at the land in question. The current photographs of the area in question depicting the latitude and longitude are annexed herewith as **Annexure R-1**. In case of any plan in future on the land in question, compliance of C&D waste management Rules shall be adhered to.
7. That it is worthwhile to mention here that answering respondent has already entered into an agreement with Indo Enviro Integrated Solutions Private Limited to setup, operate and maintain C & D Waste as per relevant Rules. Accordingly, the Concessionaire has already establish the C & D waste processing facility in 2016 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.
8. That answering respondent has always taken proactive action to deal with C & D Waste generated in the Gurugram and committed to safeguard the interest of public at large.



9. That no grievance survives in the present OA as mentioned above.

In view of submissions made herein above, nothing survives in the present Original Application and same is liable to dismissed.


Date: 19.11.2024
Place: Gurugram


Nijesh Kumar
Executive Engineer-SBM,
Municipal Corporation Gurugram

VERIFICATION

Verified that the contents of para no.1 to 9 of the reply are true and correct to the best of my knowledge and information derived from the official record. Nothing material has been concealed therein.

Date: 19.11.2024
Place: Gurugram


Nijesh Kumar
Executive Engineer-SBM,
Municipal Corporation Gurugram

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AFFIDAVIT

I, Nijesh Kumar, Executive Engineer (SBM), Municipal Corporation, Gurugram aged about 33 years do hereby solemnly affirm and state as under:

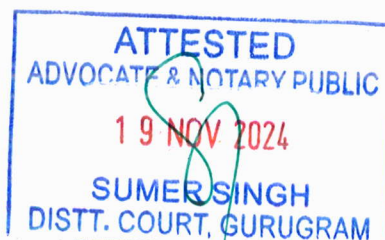
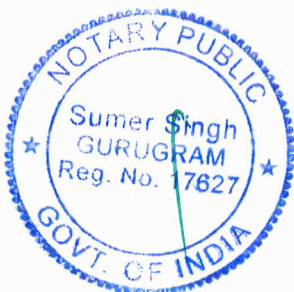
1. That I am authorized representative of the Respondent no. 3 in present case. I am well conversant with the facts and circumstances of the case therefore, I am competent to swear this affidavit.
2. That I have heard the contents of accompanying reply which has been drafted under my instructions.
3. That annexures are true copy of their originals.



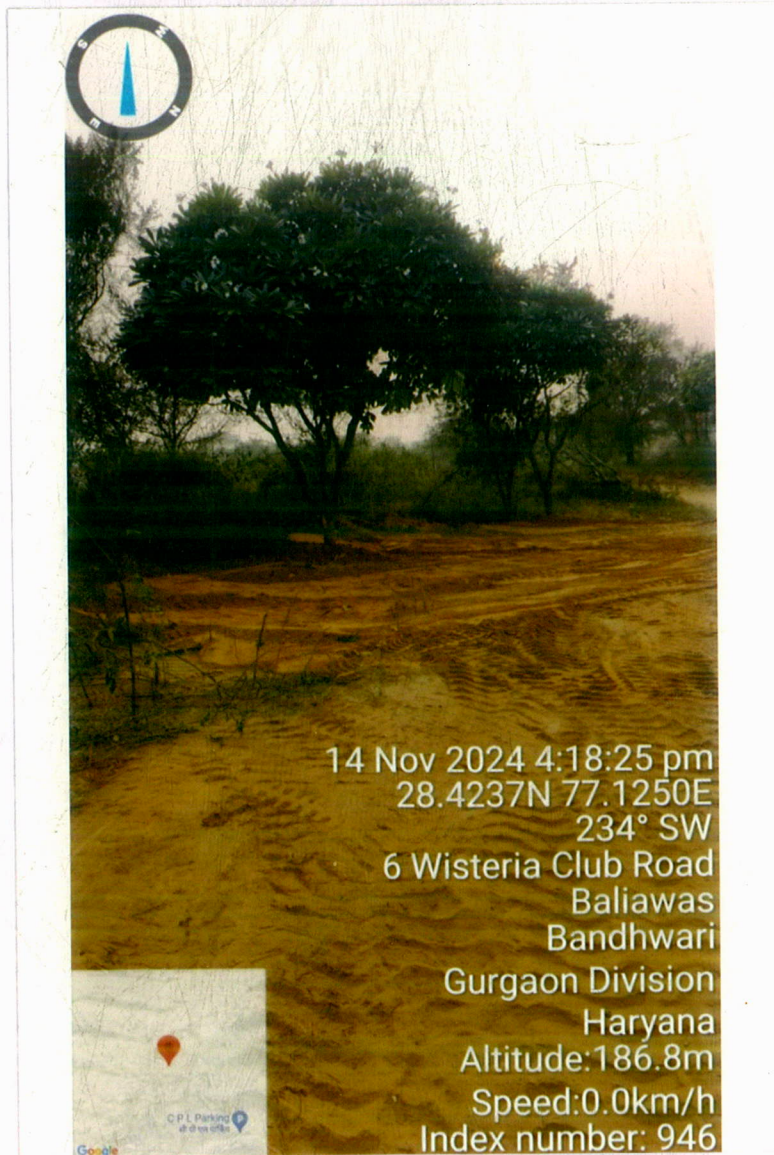
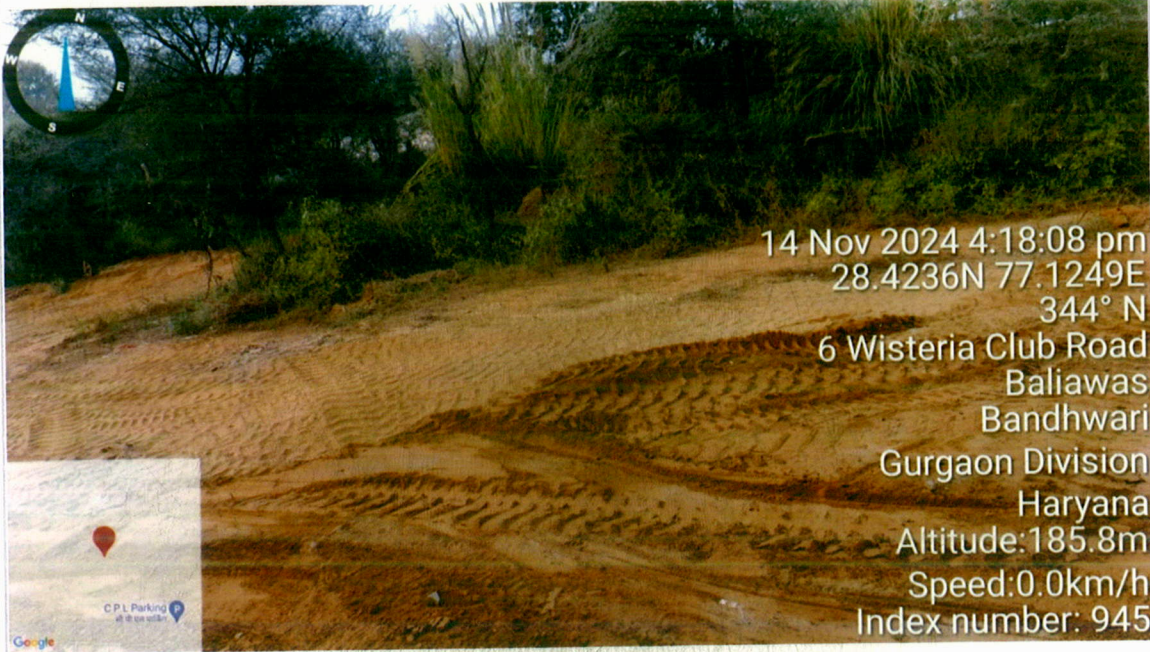
Deponent

Verification:

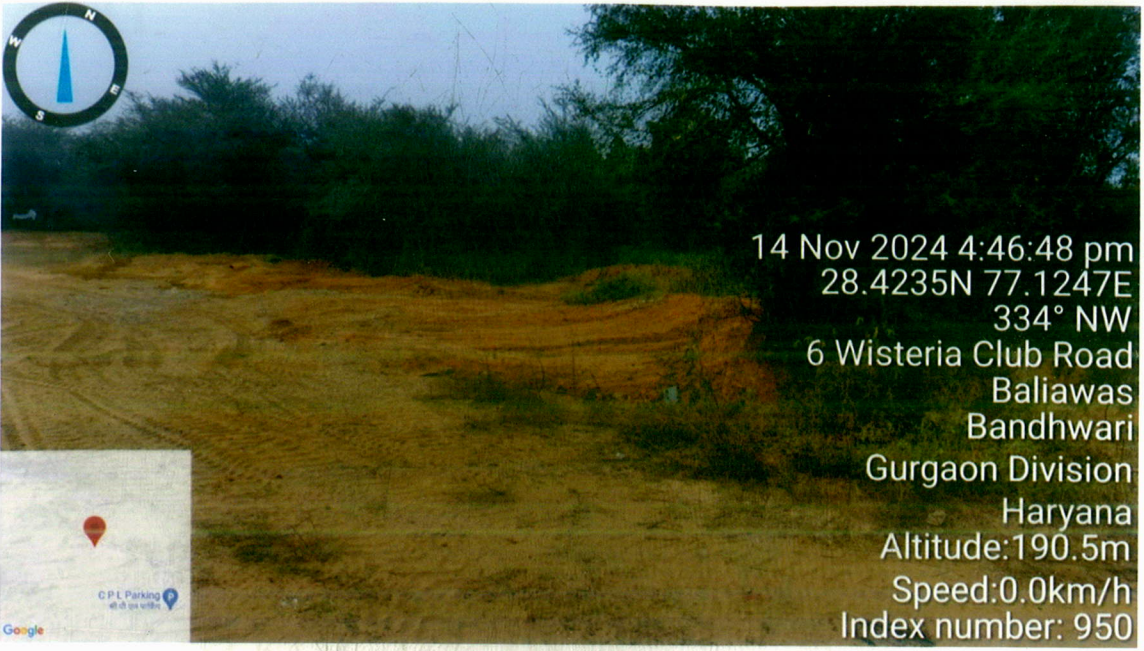
Verified that the contents of affidavit are true and correct to my knowledge and on the bases of information derived from the official record which I believe to be true and no material fact has been concealed therein.



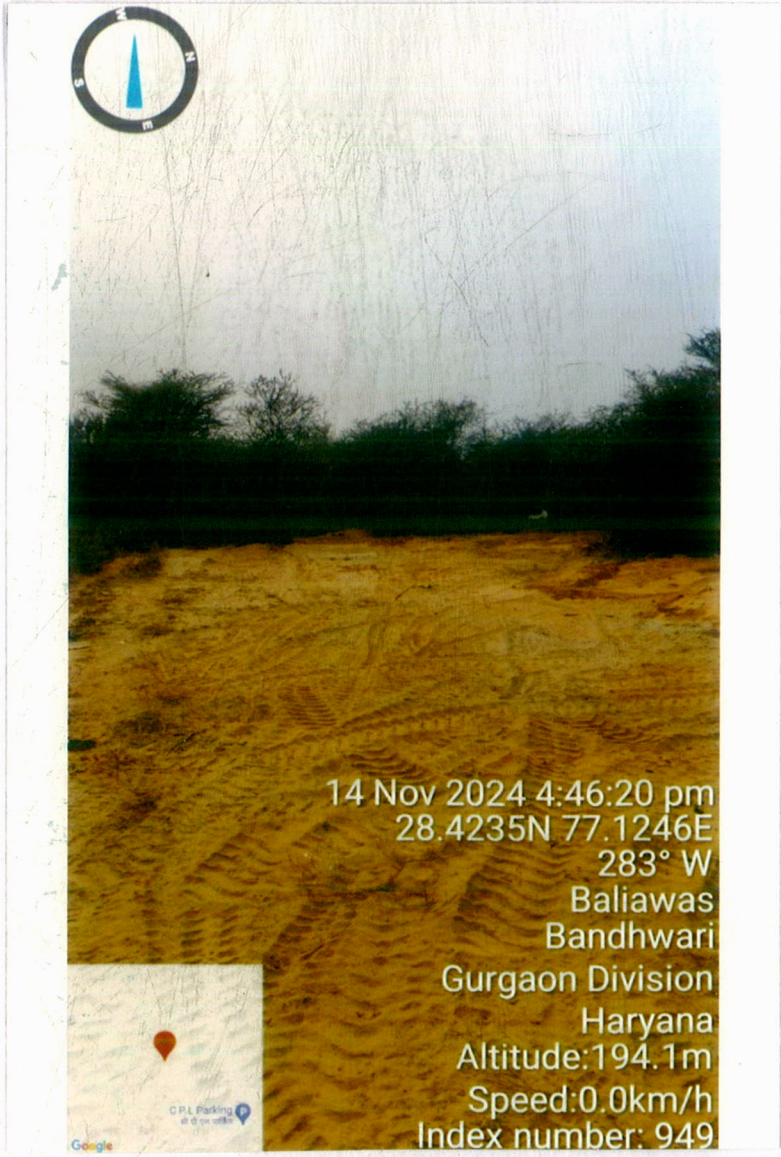
Deponent



142⁷⁻

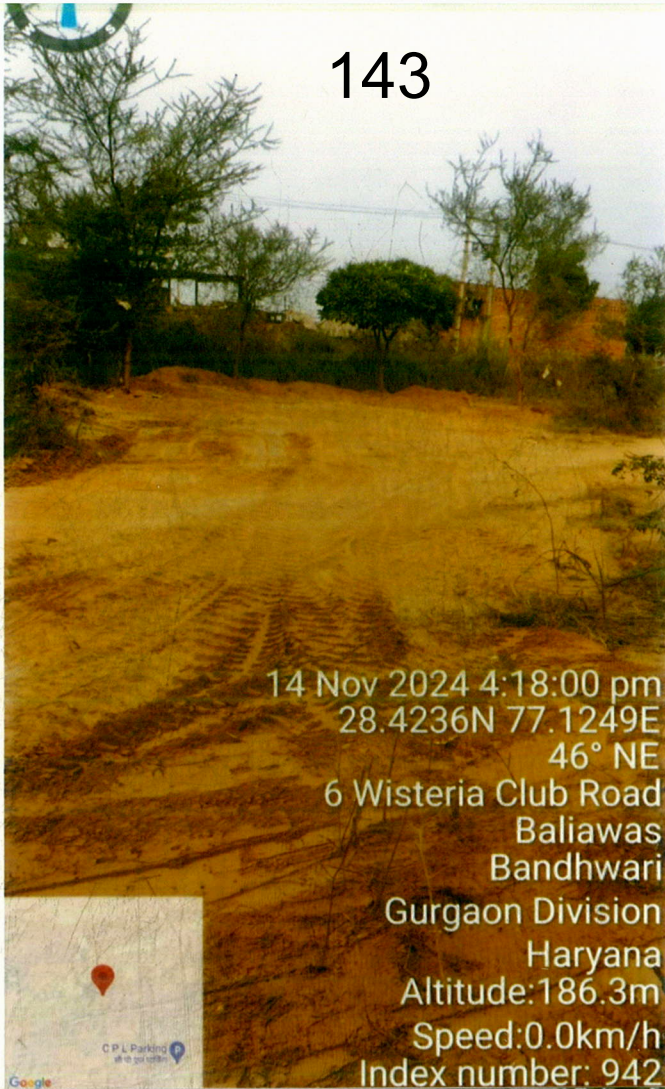


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Bandhwari
Gurgaon Division
Haryana
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Index number: 950



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Baliawas
Bandhwari
Gurgaon Division
Haryana
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Index number: 949





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 Baliawas
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 Gurgaon Division
 Haryana
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 Index number: 942



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 Baliawas
 Bandhwari
 Gurgaon Division
 Haryana
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