

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 246/2025

IN THE MATTER OF:

RAM CHANDER BHARDWAJ

APPLICANT

VERSUS

GOVT. OF NCT OF DELHI & ORS

RESPONDENTS

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Date: 11/12/2025

THROUGH

Place: New Delhi

Priyanka

Priyanka swami
Advocate
Standing Counsel For DJB
F-13, Jangpura, New Delhi 110014

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**REPLY ON BEHALF OF RESPONDENT – DELHI JAL BOARD WITH
AFFIDAVIT.**

MOST RESPECTFULLY SHOWETH:

1. That the present Reply Affidavit is being filed on behalf of the Delhi Jal Board (hereinafter "DJB" or "the answering Respondent") in response to the averments, facts and allegations raised by the Applicant, Sh. Ram Chander Bhardwaj, concerning the alleged revival, rejuvenation and beautification of a historical tank measuring 84 Bighas (approximately 7 Hectares) situated at Sector A-10, Narela, Delhi. The answering Respondent craves leave to submit this detailed reply placing correct facts before this Hon'ble Tribunal.

2. That at the very outset, the answering Respondent most respectfully submits that the subject land, including the alleged historical water body located therein, does not fall under the ownership and control of Delhi Jal Board. The answering Respondent has neither any jurisdiction over the said land nor any statutory or administrative mandate in relation to its revival, maintenance, preservation or rejuvenation. Accordingly, the answering Respondent is not a necessary or proper party in so far as the issues relating to the said tank are concerned.
3. The Applicant has narrated certain historical aspects about the water body, including its alleged origin during the 11th Century under a King named Chand, its earlier use for water sports, and the presence of Gau Ghats on all four sides. These statements pertain to historical background and land-use records, which fall strictly within the domain of the land-owning authority, i.e., DDA. The answering Respondent neither admits nor disputes such historical details, as the same are beyond the purview, custody, control, knowledge and statutory functioning of the DJB. It is respectfully stated that any verification of such claims can only be done by the DDA or the concerned departments responsible for archaeological or historical record-keeping.

4. The Applicant has further referred to various acquisition proceedings undertaken by the erstwhile Delhi Administration, including the issuance of Notification No. F.1(43)/63-L&H dated 30.10.1963 for acquisition of approximately 9500 acres for the public purpose of developing the Narela Township. The Applicant has also referred to subsequent declaration under Section 6 dated 16.01.1969 and Awards including Award No. 30/83-84 and Award No. 202/86-87, pursuant to which possession of the acquired land was taken over by the Delhi Development Authority on 23.09.1986.
5. That the answering Respondent, while maintaining its respect for the environmental objectives of this Hon'ble Tribunal, submits that the present application, insofar as it seeks relief against the DJB, is misconceived, untenable and not maintainable. The answering Respondent prays that it be discharged from further proceedings in the matter, without prejudice to the rights of the Applicant to pursue appropriate remedies against the competent land-owning authority.
6. That the answering Respondent remains at the disposal of this Hon'ble Tribunal and undertakes to ensure due and strict

compliance with any further orders, directions, or clarifications that may be issued in the present matter.

Date: 11/12/2025

THROUGH

Priyanka

Place: New Delhi

Priyanka swami

Advocate

Standing Counsel For DJB

F-13, Jangpura, New Delhi

110014

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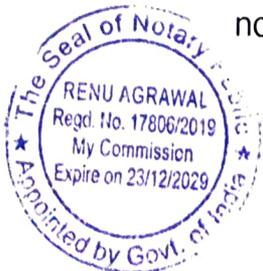
GOVT. OF NCT OF DELHI & ORS

RESPONDENTS

AFFIDAVIT

I, Sh. Sandeep Kapoor S/o Late Sh. S. K. Kapoor aged about 59 years, presently working as CE(WB) DJB on CDC at New Delhi do hereby solemnly affirm and State on oath as under:

1. That I am posted as stated above and well conversant with the facts of the present case and as such competent to swear this affidavit.
2. That the accompanying Reply has been drafted by our counsel upon my instructions.
3. That the contents of the accompanying Reply are true and correct, and the knowledge has been derived from official records and nothing material has been concealed therefrom.



4. That the Deponent will continue to extend his full cooperation and shall abide by any further directions that the Hon'ble Tribunal may issue.



[Handwritten Signature]

DEPONENT
Chief Engineer (WB)
Delhi Jal Board (HQ)
Govt. of NCT of Delhi
Varunalaya Phase-II, Karol Bagh,
New Delhi-110005

VERIFICATION

Verified on solemn affirmation at New Delhi on this 19th DEC 2025 day of December 2025, that the contents of the foregoing affidavit are true and correct to the best of my knowledge and no part of it is false and nothing material has been concealed therefrom.

[Handwritten Signature]

DEPONENT
Chief Engineer (WB)
Delhi Jal Board (HQ)
Govt. of NCT of Delhi
Varunalaya Phase-II, Karol Bagh,
New Delhi-110005

*Identified By
Priyanka Swami
Adv
I identified the deponent who
has signed in my presence*

ATTESTED
NOTARY PUBLIC
(INDIA)

11 DEC 2025