

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

**O.A. No. 525/2022**

**IN THE MATTER OF:**

...PETITIONER

LAXMI

Vs.

...RESPONDENTS

MoEF& CC & ORS.

**INDEX**

**NDOH: 05.01.2026**

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**RESPONDENT:**

**Through**



Date:04.01.2026

Place: New Delhi

**SIDDHANT BUXY  
ADVOCATE FOR THE  
RESPONDENT NO.3**

MOB: 9650409751

Email: siddhant.buxy@onyxchambers.com

Enrollment No. CG/233/2013

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI

O.A. No. 525/2022

IN THE MATTER OF:-

LAXMI

... PETITIONER

VERSUS

MoEF&CC& ORS.

... RESPONDENTS

AFFIDAVIT IN TERMS OF THE ORDER DATED 11.11.2025 PASSED BY  
THE HON'BLE NATIONAL GREEN TRIBUNAL

I, Ankit Kumar, S/o Sh. Anil Kumar, aged about 39 years, presently posted as Deputy Conservator of Forests (South Forest Division), Department of Forests & Wildlife, Government of NCT of Delhi, having office near Dr. Karni Singh Shooting Range, Tughlakabad, New Delhi, am the Respondent No 03 in the instant case. I state as under:-

1. That, I am presently working in the aforementioned capacity and as such duly authorized to submit the present affidavit in my official capacity on the basis of the official record pertaining to the aforementioned case and in terms of the directions issued by this Hon'ble Tribunal in Order dated 11.11.2025.
2. That, it is humbly submitted that Hon'ble National Green Tribunal vide its order dated 11.11.2025 has '*inter-alia*' directed ;

*"....3. Respondents no. 3, 13 and 14 are directed to take appropriate steps for securing the forest land by appropriate fencing, which may also be by way of naturally grown hedges, display board warning the*

*trespassers and carry out requisite plantation to upgrade the same as dense forest by having recourse to Miyawaki method of forest and file an action taken report in this regard with action plan, budgetary allocations and specific timelines.*

*...5. In the course of hearing, Mr. Puneet Tiwari, Range Forest Officer, (South) Delhi who is physically present before this Tribunal has submitted that some parcels of forest land which are in possession of the forest department are land locked and do not have the passage.  
6. Respondent no. 3 is directed to file affidavit in this regard giving all requisite details..."*

3. That in compliance with the directions of the Hon'ble Tribunal, the Khasra (s) which are land locked and do not have the direct passage to access the forest land are being shown in the table below:-

<b>Khasra No.</b>	<b>Status</b>
963min (02-08)	This Khasra is surrounded by the non-forest land i.e. Hanslok Ashram; access to forest land is through the private land.
961min (07-13)	This Khasra is surrounded by the property of Hanslok Ashram. No direct passage is available.
969 min (01-11)	This Khasra is surrounded by the property of Hanslok Ashram. No direct passage is available.

4. In compliance to the above, the following is being submitted in the tabular chart below:-

Khasra No as per Divisional Commissioner Affidavit dated 05.04.2019 filed before Hon'ble NGT in O.A. No. 58/2013 Sonya Ghosh vs. GNCTD & Ors.	Protection of Forest Land by Wire Fencing.	Installation of Departmental Display Board at forest land warning trespassers.	Status as to whether forest land is land-locked and presently lack proper direct access to forest land.	Status as to whether forest land is having existing plantation.	Status in respect of space availability for carrying out dense plantation through Miyawaki methodology.
848 (06-11)	Yes	Yes	No	No	Approximately an area of 02 hectares has been identified for carrying out the required plantation in the vacant forest land parcels subject to proper direct access to forest land
963min(02-08)	No	No	Yes	No	
969min(01-11)	Yes	Yes	Yes	Yes	
961min (07-13)	Yes	Yes	Yes	Yes	
954/2 (08-08)	No	Yes	No	No	
730 (00-02)	No	Yes	No	No	
725(19-11), 729 (04-04), 726 (12-04), 731 (20-06)	No	No	No	No	-
As per Order dated 13.12.2021, it was directed that "In the meanwhile the parties to maintain status quo qua the possession of the suit property/land as of today" in the matter titled as <i>Arun Kumar Jain vs.DCF&amp; Ors.</i> , CS(OS) 658/2021 for 14 bigha of the total 19 bigha 11 biswa. The remaining area comprising 5 bigha 11 biswa is under possession of the Forest Department.					

5. That it is humbly submitted that Administrative Approval has been sought for inviting E-Tender vide F.No. 79/DCF(S)/Dev/E-Tender/Miawaki/2025-26 dated 01.01.2026 for creation and maintenance of dense forest by planting 60,000 saplings of native species of trees in the ridge forest area of Village Bhatti by adopting Miyawaki Method and demarcating the boundaries by installing fencing around the Khasra(s).
6. That it is most respectfully submitted that, owing to the prevailing winter season, the climatic conditions are presently not conducive for undertaking plantation activities in the aforesaid areas. It is further submitted that the process for approval of the tender is presently underway, and the plantation work shall be undertaken within a period of four (04) months from the date of receipt of approval and finalisation of the tender. The detailed action plan along with proposed budgetary requirements, and specific timelines are annexed herewith as **ANNEXURE-1**.
7. That a letter bearing F. No. 57/DCF(S)/Legal/2022-23/6092-93 dated 19.12.2025 addressed to the Deputy Commissioner (South Zone) was also communicated to remove the construction waste/solid waste/debris lying pending in the above-referred Khasra(s). The copy of the letter communicated to the Deputy Commissioner (South Zone), MCD is annexed herewith as **ANNEXURE-2**.
8. That a letter bearing F. No. 57/DCF(S)/Legal/2022-23/6378-79 dated 02.01.2026, addressed to the District Magistrate (South), was also communicated requesting the necessary remedial measures to provide access to the Forest Department in respect of certain land-locked parcels of forest land in the possession of the Forest Department in the above-mentioned

Khasra(s). A true copy of the said letter, as communicated to the District Magistrate (South), is annexed herewith and marked as ANNEXURE-3.

9. It is humbly submitted that the respondents have the highest respect and regard for the orders of this Hon'ble Tribunal continue to remain committed to comply with the same in both letter and spirit. The present additional affidavit and its annexure (s) are being placed before this Hon'ble Tribunal for its consideration.

  
DEPONENT

**VERIFICATION:-**

Verified at New Delhi on this 03 of January, 2026 that the contents of this affidavit are true and correct on the basis of the official record maintained by the answering respondent in its day to day affairs of this office.

  
DEPONENT

**Action Plan for Dense Plantation****Village Bhatti (2.0 Ha)****1. Objective**

To develop a self-sustaining, high-density native forest using a ridge-suitable Miyawaki methodology for ecological restoration, biodiversity enhancement, and micro-climate improvement.

**2. Scope of Work**

- Area: **2.0 Hectares (20,000 sqm)**
- Plantation Density: **3 saplings/sqm**
- Total Saplings: **60,000**
- Species Composition:
  - Top Canopy: 40% (≈24,000)
  - Mid-Storey: 30% (≈18,000)
  - Shrubs/Ground Storey: 30% (≈18,000)
- Methodology: **Randomized high-density plantation suitable to Ridge (Miyawaki-like)**

**3. Activity-wise Timeline**

Activity	Timeline
Issue of Work Order	1st week of February
Site preparation & soil treatment	2nd-4th week of February
Procurement of saplings	Parallel with site preparation
Dense plantation work	1st-2nd week of March till Monsoon
Protection (chain-link fencing / hedges)	Along with plantation
Irrigation & maintenance	Continuous
Maintenance period	<b>3 Years</b>

*Note: Timeline is tentative and subject to approval, site conditions, and weather.*

**4. Budgetary Requirements**

Component	Amount (₹)
Cost of Creation	1,37,60,806
Cost of Maintenance (3 years)	2,51,54,085
Cost of Fencing	19,13,763
<b>Total Project Cost</b>	<b>₹ 4,08,28,745</b>

*(Rupees Four Crore Eight Lakh Twenty-Eight Thousand Seven Hundred Forty-Five Only)*

**5. Funding**

- To be met from **State Budget of GNCTD**
- Adequate funds are available for execution of the project.

**GOVERNMENT OF NCT OF DELHI**  
**DEPARTMENT OF FORESTS & WILDLIFE**  
**OFFICE OF DEPUTY CONSERVATOR OF FORESTS(SOUTH)**  
**NEAR DR. KARNI SINGH SHOOTING RANGE**  
**TUGHLAKABAD, NEW DELHI- 110044.**

F. No. 57/DCF(S)/Legal/2022-23/ 6092-93

Dated: 19/12/2025

To,

The Deputy Commissioner (South Zone),  
Sri Arbindo Marg, Green Park Extension,  
New Delhi-110016.

**Sub: Removal of the construction waste & debris lying pending on Khasra No 848, 963 min, 969min, 725, 726, 729, 730min, 731, 956, 961, 954/2 min of village Bhatti in terms of the Order dated 11.11.2025 passed by the Hon'ble National Green Tribunal in the matter titled as "Laxmi Vs MoEF & CC" in OA No. 525/2022.**

Sir,

With reference to the subject cited above, it is to bring to your kind attention that a matter titled as "Laxmi Vs MoEF & CC" in OA No 525/2022 is pending adjudication before the Hon'ble National Green Tribunal and is now fixed for hearing on 05.01.2026.

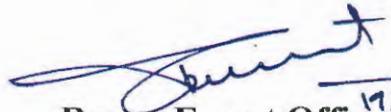
The Hon'ble Tribunal during the hearing on 11.11.2025 had observed that the construction waste/solid waste/debris is lying pending on the above said Khasra (s) which are a forest land and directed as below:-

*"....Respondent No. 5 is directed to take appropriate steps for removal of solid waste and construction and demolition waste and file action taken in compliance of the order passed by this Tribunal. "*

It is also to be noted that the Commissioner, MCD has been arrayed as Respondent No. 5 in the said matter.

Therefore, in view of above, it is requested to take appropriate steps for the necessary compliance of the order dated 11.11.2025 passed by the Hon'ble Tribunal.

This issues with the approval of Competent Authority.

  
Range Forest Officer  
South Forest Division  
19/12/25

Copy to:

1. The Deputy Conservator of Forest (South), Near Dr. Karni Singh Shooting Range, Tughlakabad, New Delhi-110044 for kind information.

  
Range Forest Officer  
South Forest Division  
19/12/25

URGENT HON'BLE NGT MATTER

**GOVERNMENT OF NCT OF DELHI  
DEPARTMENT OF FORESTS & WILDLIFE  
OFFICE OF DEPUTY CONSERVATOR OF FORESTS(SOUTH)  
NEAR DR. KARNI SINGH SHOOTING RANGE  
TUGHLAKABAD, NEW DELHI- 110044.**

F. No. 57/DCF(S)/Legal/2022-23/ 6378-79

Dated: 02.01.2026

To,

The District Magistrate (South),  
M. B. Road, Saket,  
New Delhi-110068.

**Sub: Provision of direct access/passage to land-locked forest land bearing Khasra Nos. 848, 963 (min), 969 (min), 725, 726, 729, 730 (min), 731, 956, 961 and 954/2 of Village Bhatti in compliance of the Order dated 11.11.2025 passed by the Hon'ble National Green Tribunal in O.A. No. 525/2022 titled "Laxmi Vs. MoEF&CC & Ors."**

Sir,

With reference to the subject cited above, it is to bring to your kind attention that a matter titled as "Laxmi Vs MoEF & CC" in OA No 525/2022 is pending adjudication before the Hon'ble National Green Tribunal and is now fixed for hearing on 05.01.2026. The Hon'ble Tribunal during the hearing on 11.11.2025 had observed as below:-

"... 5. In the course of hearing, Mr. Puneet Tiwari, Range Forest Officer, (South) Delhi who is physically present before this Tribunal has submitted that some parcels of forest land which are in possession of the forest department are land locked and do not have the passage."

....7. The District Magistrate, (South) Delhi is directed to look into the matter and submit report before this Tribunal giving the factual position and remedial measures required to be taken."

In view of the above directions of the Hon'ble Tribunal, it is requested that necessary action may kindly be taken on priority to examine the issue and to facilitate provision of access/passage to the land-locked forest parcels pertaining to the aforesaid Khasra numbers, and to initiate appropriate remedial measures in compliance of the order dated 11.11.2025.

The matter being urgent and listed before the Hon'ble NGT on 05.01.2026, early action and submission of the requisite report would be highly appreciated.

This issues with the approval of the Competent Authority.

*Puneet Tiwari*  
02/01/2026  
**Range Forest Officer  
South Forest Division**

**Copy to:**

1. The Deputy Conservator of Forest (South), Near Dr. Karni Singh Shooting Range, Tughlakabad, New Delhi-110044 for kind information.

Handwritten signature in blue ink, with the date 02/01/2026 written below it.

**Range Forest Officer  
South Forest Division**