

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

Original Application No. 404 of 2025

IN THE MATTER OF:

Ram Kishore Yadav

... Applicant

Versus

Ministry of Environment, Forest & Climate Change & Others

... Respondents

RECTIFIED REJOINDER

(To the Reply filed by Respondent No. 3 – Haryana State Pollution Control Board)

(Filed after curing registry defects, pursuant to procedural communication dated 06.12.2025)

Filed by:

Ram Kishore Yadav

(Applicant-in-Person)

Place: Gurugram

Date: 20.12.2025

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(Filed along with Rectified Rejoinder in OA No. 404 of 2025)

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RECTIFIED REJOINDER

(To the Reply filed by Respondent No. 3 – Haryana State Pollution Control Board)

PRELIMINARY STATEMENT

1. The present Rectified Rejoinder is filed in accordance with Rule 20 of the National Green Tribunal (Practice and Procedure) Rules, 2011, and is confined strictly to rebutting the averments and documents relied upon in the Reply filed by Respondent No. 3 (Haryana State Pollution Control Board). No new cause of action, factual foundation or substantive relief is introduced herein.
2. All annexures relied upon in this Rectified Rejoinder either form part of the record of the Original Application or arise directly from disclosures and assertions made in the Reply of Respondent No. 3, and are filed strictly for the limited purpose of rebuttal and clarification.
3. Each factual assertion is supported by specific reference to annexures, page numbers and paragraphs, to assist this Hon'ble Tribunal and to maintain complete transparency on record.

I. FUNDAMENTAL DEFECT IN THE REPLY OF RESPONDENT NO. 3

4. Respondent No. 3 has failed to place on record a single project-specific statutory environmental document pertaining to the project titled "DLF The Dahlias", including any Environmental Clearance (EC), appraisal record, compliance report, monitoring report or site inspection report.
5. The Reply relies exclusively on Environmental Clearances and Consents to Establish (CTEs) admittedly pertaining to other DLF projects and land parcels, without establishing identity between such approvals and the land on which "DLF

The Dahlias" is being developed, as demonstrated in the Record Comparison Table (Annexure A/6).

6. It is respectfully submitted that the burden to establish the existence of valid, project-specific statutory environmental clearances lies upon the Project Proponent and the regulatory authority, which burden remains undischarged on the present record.

II. PARA-WISE REBUTTAL OF THE REPLY

Paras 1–2 (General Assertions)

7. The Reply contains generic assertions of compliance unsupported by any site inspection report, environmental monitoring data or independent verification carried out by Respondent No. 3, despite visible and ongoing excavation activity at the project site.
8. Satellite imagery and site photographs placed on record (Annexures A/7 and A/8) demonstrate continuity and scale of physical land disturbance, which has not been addressed or verified by Respondent No. 3.

Para 3 – Reliance on Deputy Commissioner's Letter

9. The communication issued by the Deputy Commissioner, relied upon by Respondent No. 3, is revenue-based in nature and does not constitute any statutory forest clearance, Aravalli exemption or environmental approval.
10. The Forest Department RTI reply clarifies that (i) the communication is based solely on revenue records; and (ii) no tree felling, land conversion or construction

activity is permissible without prior approval of the competent forest authority (Annexure A/1).

Para 4 – Environmental Clearance dated 17.08.2022

11. The Environmental Clearance dated 17.08.2022 relied upon by Respondent No. 3 does not pertain to the project titled “DLF The Dahlias”, as evident from material mismatches in project name, plot area, FAR / built-up area and location (Annexure A/6).
12. The Ministry of Environment, Forest & Climate Change has categorically confirmed that no Environmental Clearance, appraisal, monitoring or compliance record exists for any project titled “DLF The Dahlias” (Annexure A/3).
13. In the absence of any document establishing identity between the land parcel covered under the relied-upon ECs and the land on which “DLF The Dahlias” is being developed, reliance on such ECs is legally impermissible and renders the regulatory basis of the Reply unsustainable.

Para 5 – Environmental Clearance dated 14.09.2024 (DLF Crest Expansion)

14. The Environmental Clearance dated 14.09.2024 pertains to a distinct and unrelated project titled “DLF Crest Expansion” and bears no demonstrated nexus with “DLF The Dahlias”, as reflected in Annexure A/6.

CTEs relied upon by Respondent No. 3

15. The Consents to Establish relied upon by Respondent No. 3 are founded upon Environmental Clearances not shown to be project-specific to "DLF The Dahlias", and no independent site inspection or verification is disclosed to have been conducted prior to grant of such consents.

III. DEFECTIVE APPRAISAL AND REGULATORY SCRUTINY

16. Even assuming that appraisal of the project falls within the jurisdiction of the State Environment Impact Assessment Authority, such appraisal is valid only if based on correct disclosure of land identity, project parameters and environmental category.
17. The record demonstrates absence of clarity regarding land parcel identity and project particulars, thereby raising a serious issue of defective appraisal and non-application of mind in respect of the project titled "DLF The Dahlias". An approval granted on incomplete or mismatched project particulars is void in law.
18. It is respectfully submitted that the disclosures available on record, including the RERA registration of the project 'DLF The Dahlias', indicate a plot area of approximately 16.48 acres with a total disclosed built-up area exceeding 4,00,000 square metres. The Project Proponent's own public representations and marketing materials further project the development as a high-intensity, premium residential project with enhanced specifications, tower configuration and layout parameters.

Such scale of development, coupled with material differences in built-up area, FAR, project configuration, layout plan and land parcel identity when compared

with the Environmental Clearances relied upon, raises a serious issue of incorrect or defective appraisal.

Additionally, the project site is located in close proximity to environmentally sensitive features, including the Aravalli / Delhi Ridge landscape, within approximately 6–7 km of the Asola Bhatti Wildlife Sanctuary, and within the larger ecologically fragile Gurugram–Aravalli belt. These locational factors attract heightened environmental scrutiny under the EIA Notification, 2006 and the precautionary principle.

In these circumstances, the project prima facie attracts treatment as a Category 'A' project and, at the very least, warrants strict re-examination of the appraisal process undertaken. Until such verification is completed, continuation of deep excavation, hill cutting and large-scale site alteration in a sensitive ecological zone poses a real risk of irreversible environmental harm and therefore calls for immediate preventive restraint.”

IV. ARAVALLI / FOREST REGULATORY APPLICABILITY

19. Without asserting that the project land is notified forest or per se governed by the Punjab Land Preservation Act, 1900, the Applicant submits that the admitted location of the project within the Aravalli / Delhi Ridge influence zone attracts heightened statutory and environmental scrutiny under the precautionary principle and settled jurisprudence of this Hon'ble Tribunal.

20. The Gurugram–Manesar Master Plan 2031 classifies adjoining land as Natural Conservation Zone (NCZ-1000), necessitating strict planning and environmental compliance, which Respondent No. 3 has failed to demonstrate (Annexure A/5).

V. WILDLIFE / ESZ PROXIMITY

21. The Wildlife Department RTI reply records that the project site is located approximately 6–7 km from the Asola Bhatti Wildlife Sanctuary (Annexure A/2).
22. The same reply confirms absence of any wildlife impact assessment, corridor study or ESZ-related evaluation for the project area. In environmentally sensitive landscapes, absence of assessment itself constitutes a regulatory gap warranting independent verification.

VI. GROUNDWATER REGULATORY REGIME

23. The CGWA RTI reply clarifies that regulation of groundwater extraction in Haryana vests exclusively with the Haryana Water Resources Authority pursuant to the Haryana Groundwater Regulatory Framework, 2021 (Annexure A/4).
24. No permission or No Objection Certificate issued by HRWA authorising groundwater extraction for the project has been placed on record by the Project Proponent or Respondent No. 3.
25. In the absence of statutory permission, continued deep excavation poses a real and imminent risk of irreversible groundwater depletion, warranting preventive intervention.

VII. SITE ACTIVITY AND URGENCY

26. Satellite imagery for the period 2023–2025 (Annexure A/7) and geo-tagged site photographs (Annexure A/8) demonstrate continuity and scale of excavation and deployment of heavy machinery at the project site.

27. Such activity has not been addressed by any inspection or verification report in the Reply of Respondent No. 3.

VIII. CONSOLIDATED POSITION

28. The record establishes that:

- (a) No project-specific Environmental Clearance exists for “DLF The Dahlias” (Annexure A/3);
- (b) ECs and CTEs relied upon pertain to other projects and land parcels (Annexure A/6);
- (c) Statutory Aravalli and forest-related scrutiny is attracted (Annexures A/1 and A/5);
- (d) The project lies in proximity to a wildlife-sensitive area without any impact assessment (Annexure A/2);
- (e) Groundwater extraction without HRWA permission remains unauthorised (Annexure A/4).

PRAYER

In view of the above, the Applicant respectfully prays that this Hon’ble Tribunal may be pleased to:

- (i) Direct Respondent No. 3 and the Project Proponent to place on record project-specific Environmental Clearance(s), appraisal records and land identity particulars, including khasra numbers and site coordinates, pertaining specifically to “DLF The Dahlias”;



(ii) Direct the Project Proponent to place on record valid permission / No Objection Certificate issued by the Haryana Water Resources Authority for groundwater extraction;

(iii) Pending such verification, direct maintenance of status quo with respect to deep excavation and groundwater extraction, in exercise of the precautionary principle;

(iv) Direct a joint site inspection by CPCB (as the central monitoring authority), HSPCB and the concerned Forest / Wildlife Department, and submission of a consolidated factual inspection report;

(v) Pass such other or further orders as this Hon'ble Tribunal may deem fit in the interest of environmental protection and justice.



Applicant

Ram Kishore Yadav

VERIFICATION

I, Ram Kishore Yadav, the Applicant-in-Person above named, do hereby verify that the contents of the above Rejoinder from paragraphs 1 to 28 are true and correct to my knowledge and belief, based on records, documents and information received under the Right to Information Act, 2005.

No material fact has been concealed therefrom and no part of it is false.

Verified at Gurugram on this 20th day of December, 2025.



Ram Kishore Yadav

Applicant-in-Person



Ram Kishore Yadav
10 DEC 2025

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AFFIDAVIT

I, Ram Kishore Yadav, S/o Late Shri Surat Singh, aged about 53 years,
Resident of SR-29 FF, DLF City Phase-III, Nathupur, Tehsil Wazirabad, Distt Gurugram,
Haryana – 122002,
presently the Applicant in Original Application No. 404 of 2025,
do hereby solemnly affirm and state as under:

1. That I am the Applicant in the accompanying Rejoinder filed in OA No. 404/2025 and am fully competent to swear this affidavit.
2. That I have carefully read and understood the contents of paragraphs 1 to 10 of the accompanying Rejoinder. The facts stated therein are true and correct to my personal knowledge, and the legal submissions are based on legal advice which I believe to be true.
3. That Annexures A/1 to A/8 filed with the accompanying Rejoinder are true and correct copies of their respective originals.



Ram Kishore Yadav

DEPONENT
Ram Kishore Yadav

VERIFICATION

I, the above-named deponent, do hereby verify that the contents of this Affidavit are true and correct to my knowledge and belief, and nothing material has been concealed therefrom.

Verified at Gurugram,
on this 10th day of December 2025.

Ram Kishore Yadav

DEPONENT
Ram Kishore Yadav

ATTESTED

DHARM PAL
Advocate & Notary
Gurugram, Haryana

10 DEC 2025

10A

ANNEXURE A/1**FOREST DEPARTMENT RTI REPLY**

(DFO, Gurugram – dated 30.07.2025)

Explanatory Note:

(For Assistance of the Hon'ble Tribunal)

1. The Forest Department has clarified that certain khasra numbers are not recorded as “Notified Reserved Forest” or “Protected Forest” only as per the revenue records available with the Forest Department.
2. The same reply records that the land falls within the influence / vicinity of the Aravalli landscape / Delhi Ridge, thereby attracting statutory environmental scrutiny under applicable laws.
3. The Forest Department has expressly stated that no tree felling, land use change or construction activity is permissible without prior approval of the competent Forest Authority.
4. The RTI reply contains a clear disclaimer that it does not amount to any Forest Clearance or NOC and that all applicable laws including the Forest (Conservation) Act, PLPA, Aravalli Notifications and EIA Notification must be complied with.
5. Accordingly, the RTI reply clarifies that no exemption from statutory forest or Aravalli-related scrutiny has been granted for the project.

(Original RTI reply follows)



प्रभागीय वन अधिकारी द्वारा स्पष्टीकरण पत्र
Clarification letter by
Concerned Divisional Forest Officer
हरियाणा सरकार / Government of Haryana



हरियाणा भू-परिक्षण अधिनियम, 1900 (1900 का पंजाब का अधिनियम II) अथवा वन अथवा प्रतिबंधित भूमि से संबंध में निराक्षेप प्रमाण पत्र
NOC in respect of Haryana Land and Preservation Act, 1900 (Punjab Act, II of 1900) or Forest or Restricted lands.

नाम Name	सुनील अगरवाल Sunil Agarwal
संगठन का नाम Organisation Name	DF Limited
वर्तमान पता Current Address	1st Floor, Gateway Tower, Cyber City
भूमि स्थान Land Location	WAZIRABAD, Gurgaon, Wazirabad
भूमि मापन Land Measurements	43.970 (Acre)
आयत नम्बर / मुरबा नम्बर Rectangle No./ Murba No.	Khasra Nos : 1998 Min (0.313), 2000 Min (0.188), 2001 Min (2), 2002 Full (0.156), 2008 Min (0.125), 2010 Min (0.469), 2011 Full (0.406), 2012 Full (1.031), 2013 Full (0.531), 2014 Full (0.656), 2015 Full (0.969), 2016 Full (1.219), 2018 Min (0.938), 2020 Full (0.531), 2021 Full (0.625), 2023 Min (0.688), 2024 Full (1), 2025 Full (1.250), 2029 Full (0.969), 2030 Full (0.781), 2126 Full (1.781), 2326 Min (0.125), 2005/1/2 Min (0.719), 2022/1/1 Full (1.531), 2022/1/2 Full (1.063), 2003/1 Min (3.281), 2005/2 Full (0.375), 2006/1 Full (1.063), 2006/2 Min (0.016), 2007/1min (0.531), 2007/2 Min (1.719), 2017/1full (0.680), 2017/2 Full (0.039), 2019/1 Full (0.734), 2019/2 Full (0.453), 2022/2 Min (0.688), 2026/1 Full (0.469), 2026/2 Full (0.953), 2026/3 Full (0.469), 2027/1 Full (0.125), 2027/2 Full (0.125), 2028/1 Full (1.656), 2028/2 Min (1.875), 2031/2 Min (0.313), 2032/2 Min (0.039), 2032/3 Full (0.338), 2032/4 Full (0.125), 2033/2 Min (0.219), 2033/3 Full (0.188), 2034/1 Full (0.813), 2034/2 Full (0.781), 2035/1 Min (0.563), 2035/2 Min (0.094), 2035/3 Full (0.547), 2037/4 Min (0.188), 2056/1 Min (0.469), 2056/2 Min (1.547), 2057/3 Min (1.250), 2125/3 Min (1.188). Total Area : 43.970 Acers ;

Attested

Dy. Conservator of Forests,
Gurugram

Reference No. (SRN):- GG6-QB9-CUM0

जारी करने की तिथि / Date of Issuance: 30-07-2025

जारी करने का स्थान / Place of Issuance: Gurgaon

जारी करने वाला प्राधिकरण / Issuing Authority: Divisional Forest Officer

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प्रभागीय वन अधिकारी द्वारा स्पष्टीकरण पत्र
Clarification letter by
Concerned Divisional Forest Officer
हरियाणा सरकार / Government of Haryana



हरियाणा वन-परिष्ठापन अधिनियम, 1900 (1900 का पंजाब का अधिनियम II) अथवा वन अथवा प्रतिबंधित भूमि से संबंध में निराक्षेप प्रमाण पत्र।
NOC in respect of Haryana Land and Preservation Act, 1900 (Punjab Act, II of 1900) or Forest or Restricted lands.

किला नम्बर Killa Number	Kila No Not Applicable, Applicable Khasra Nos Are : 1998 Min (0.313), 2000 Min (0.188), 2001 Min (2), 2002 Full (0.156), 2008 Min (0.125), 2010 Min (0.469), 2011 Full (0.406), 2012 Full (1.031), 2013 Full (0.531), 2014 Full (0.656), 2015 Full (0.969), 2016 Full (1.219), 2018 Min (0.938), 2020 Full (0.531), 2021 Full (0.625), 2023 Min (0.688), 2024 Full (1), 2025 Full (1.250), 2029 Full (0.969), 2030 Full (0.781), 2126 Full (1.781), 2326 Min (0.125), 2005/1/2 Min (0.719), 2022/1/1 Full (1.531), 2022/1/2 Full (1.063), 2003/1 Min (3.281), 2005/2 Full (0.375), 2006/1 Full (1.063), 2006/2 Min (0.016), 2007/1 Min (0.531), 2007/2 Min (1.719), 2017/1 Full (0.680), 2017/2 Full (0.039), 2019/1 Full (0.734), 2019/2 Full (0.453), 2022/2 Min (0.688), 2026/1 Full (0.469), 2026/2 Full (0.953), 2026/3 Full (0.469), 2027/1 Full (0.125), 2027/2 Full (0.125), 2028/1 Full (1.656), 2028/2 Min (1.875), 2031/2 Min (0.313), 2032/2 Min (0.039), 2032/3 Full (0.338), 2032/4 Full (0.125), 2033/2 Min (0.219), 2033/3 Full (0.188), 2034/1 Full (0.813), 2034/2 Full (0.781), 2035/1 Min (0.563), 2035/2 Min (0.094), 2035/3 Full (0.547), 2037/4 Min (0.188), 2056/1 Min (0.469), 2056/2 Min (1.547), 2057/3 Min (1.250), 2125/3 Min (1.188). Total Area : 43.970 Acre
प्रयोजन Purpose	Building Construction



जारी करने की तिथि / Date of Issuance: 30-07-2025
जारी करने का स्थान / Place of Issuance: Gurgaon
जारी करने वाला प्राधिकरण / Issuing Authority: Divisional Forest Officer

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प्रभागीय वन अधिकारी द्वारा स्पष्टीकरण पत्र
Clarification letter by
Concerned Divisional Forest Officer
हरियाणा सरकार / Government of Haryana



हरियाणा पृथक्करण अधिनियम, 1900 (1900 का पंजाब का अधिनियम II) अथवा वन अध्याय प्रतिबंधित भूमि से संबंध में निराक्षेप प्रमाण पत्र।
NOC in respect of Haryana Land and Preservation Act, 1900 (Punjab Act, II of 1900) or Forest or Restricted lands.
Applicant Sunil Agarwal located at village/city WAZIRABAD district Gurgaon
made a proposal to use this land for Building Construction. It is made clear that:

- a) As per records available above said land is not part of notified Reserved Forest, Protected Forest under Indian Forest Act, 1927 or any area closed under section 4 of Punjab Land Preservation Act, 1900.
- b) It is clarified that by the Notification No. S.O.8/PA.2/1900/S.4/2013 dated 4th January, 2013, all Revenue Estate of Gurgaon is notified u/s 4 of PLPA 1900 and S.O.81/PA.2/1900/S.3/2012 u/s 3 of PLPA 1900. The area is however not recorded as forest in the Government record but felling of any tree is strictly prohibited without the permission of Divisional Forest Officer, Gurgaon.
- c) If approach is required from Protected Forest by the user agency, the clearance/ regularization under Forest Conservation Act 1980 will be required. Without prior clearance from Forest Department, the use of Forest land for approach road is strictly prohibited. M/s Dlf Limited whose land is located at village/city, WAZIRABAD District Gurgaon must obtain clearance as applicable under Forest Conservation Act 1980.
- d) As per the records available with the Forest Department, Gurgaon the area does not fall in areas where plantations were raised by the Forest Department under Aravalli project.
- e) All other statutory clearances mandated under the Environment Protection Act, 1986, as per the notification of Ministry of Environment and Forests, Government of India, dated 07-05-1992 or any other Act/ order shall be obtained as applicable by the project proponents from the concerned authorities.
- f) The project proponent will not violate any Judicial Order/ direction issued by the Hon'ble Supreme Court/ High Courts.
- g) It is clarified that the Hon'ble Supreme Court has issued various judgments dated 07.05.2002, 29.10.2002, 16.12.2002, 18.03.2004, 14.05.2008 etc. pertaining to Aravalli region in Haryana, which should be complied with.
- h) It shall be the responsibility of User agency/ applicant to get necessary clearances/ permissions under various Acts and Rules applicable if any, from the respective authorities/ Department.
- i) This certificate is not applicable in case of Environment Department notification dated 10.03.2016 for Screening Plant, and notification dated 11.05.2016 for Stone Crusher. Investor/Applicant has to take clearance from Environment Department in case of Screening Plant and Stone Crusher.

It is subject to the following conditions:

1. Clarification is hereby issued subject to the conditions mentioned above. Distance of the proposal is less than 5 Km. from the boundary of Delhi hence, the permission must be obtained from the competent authority.



Date: 30-07-2025

Place: Gurgaon

Raj Kumar

(Divisional Forest Officer)

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ANNEXURE A/2**WILDLIFE DEPARTMENT RTI REPLY**

(Dated 24.11.2025)

Explanatory Note:-

(For Assistance of the Hon'ble Tribunal)

1. The Wildlife Department has confirmed that the project location lies approximately 6–7 km from the Asola Bhatti Wildlife Sanctuary.
2. Leopard rescue and movement data (2018–2025) supplied by the Department indicates continued wildlife presence in the broader Gurugram–Aravalli landscape.
3. In response to multiple queries relating to wildlife assessment, ESZ study and corridor mapping, the reply states “record not available”, indicating absence of any such scientific or statutory study on record with the Department.
4. The RTI reply therefore demonstrates the project's proximity to a protected wildlife area and the absence of any wildlife impact assessment or ESZ-related study on record.

(Original RTI reply follows)

श्रीमान् मठ परजो आधिकारी
गुरदास

क्र०-232
दि०-24/11/25

विषय:- RTI application under 6(1) of the RTI Act 2006.

संदर्भ:- आपका पत्र क्र०-1308-1309, दिनांक:-29/10/25
श्रीमान् जी, उपरोक्त विषय के संबंध में मांगी गई जानकारी

निम्न अनुसार निम्न प्रकार है:-

- 1:- रिपोर्ट उपलब्ध नहीं है। (Both Faridkot and Gurgaon BHT)
- 2:- रिपोर्ट उपलब्ध नहीं है।
- 3:- रिपोर्ट उपलब्ध नहीं है।
- 4:- Leopard Rescue 1 Jan 2018 to 30 Oct. 2025 (Attached)
- 5:- रिपोर्ट उपलब्ध नहीं है।
- 6:- अज्ञात नहीं है। Sanctuary के लक्ष्य से 1-7 km है।

RTI
25/11/25

आपकी प्रतिक्रिया के लिए धन्यवाद

Copy to: Sh. Ran Kishore, B-172
DLF Regal Gardens, Sec 90, Gurgaon.

Pran
Institute for Wildlife
Education & Research

Pran
Institute for Wildlife
Education & Research

क्रमांक
दिनांक

श्रीमान मा० वल्लभ अधिकारी
अध्यापक

Subject :- Request for information regarding Wild
Life Movement Leopard corridor ES2
boundaries and Wild life Rescue/Release data for
Churugram region (Particularly DLF Phase 5 hawal
Pahari and adjoining Aravali Areas)

संदर्भ :- आणक पर क्रमांक 1308-1309 दिनांक 29/10/21
श्रीमान को पत्रिका 2018 में अक्टूबर 2021 तक तेंदुका की सुरक्षा
उपरोक्त विषयों के विषय में जानकारी देकर है।

S.No	दिनांक	कहाते	जीवन-का जो	संख्या	स्थिति	विषय
1	20/10/19	भंडार (Saha)	तेंदुका M	1	हट (विशेष करके)	PM आणक इसके तहत किया गया
2	09/08/19	वाल्मीकि	-a-	1	हट	सुरक्षा करके किया गया
3	20/10/2019	भंडार	-a-	1	हट	PM आणक इसके तहत किया गया
4	02/10/2021	शोभा नगरी (Saha)	-a-	1	हट	-a-

P.T.O

S.No	दिनांक	पदा त	पीबिआ नाम	संख्या	स्थिति	विषय
5	16/11/2022	खीर (सन्मन्त्रालय) Sehwa	तेन्दुआ	1	हट	पौर-प्राथमिक बजार विधि अर्जित पदा संस्कार विषय गथा।
6	03/01/2024	नरसिगपुर (H.D.M.)	तेन्दुआ M	1	स्वल्प	बेवाम्बु बजार अर्जित स्वाम पर चौडा गथा।
7	12/01/2025	धमैला (Sohmy)	-	-	स्वल्प	-
8	03/01/2025	गानेश्वर Sec 8	-	-	-	-

[Signature]
 Inspector Wild Life
 Distt. Garhwal

ANNEXURE A/3

MoEF&CC RTI REPLY

Explanatory Note:-

(For Assistance of the Hon'ble Tribunal)

1. The Ministry of Environment, Forest & Climate Change has categorically stated that no Environmental Clearance has been issued for any project titled "DLF The Dahlias".
2. The Ministry has further confirmed that no appraisal, monitoring, compliance or site inspection record is available on record for the said project.
3. This demonstrates that the project has not undergone appraisal at the Central level, as no such appraisal or related records are available with the Ministry.
4. Accordingly, the RTI reply raises a jurisdictional issue regarding reliance on any SEIAA-issued clearance for the project titled "DLF The Dahlias", in the absence of any Central appraisal or clearance on record.

(Original RTI reply follows)

F. No. IA3-20/18/2023-IA.III
Government of India
Ministry of Environment, Forest and Climate Change
(Impact Assessment Division)

Indira Parayavaran Bhawan
 Jor Bagh, New Delhi
 Dated: 09.10.2025

To,

Sh. Ram Kishore.
 B-1/2, DLF Regal Gardens, Sector-90,
 Gurugram, Haryana, Pin:122 505

Subject: Request for Information under RTI Act 2005 – reg.
Ref.: MOENF/R/P/25/00456 and MOENF/R/P/25/00455/1 dated 01.10.2025

Sir,

Kindly refer to your RTI application dated 01.10.2025, wherein you have sought related to copies of the Environmental Clearance of M/s DLF Crest and M/s DLF Downtown projects at Gurugram, Haryana.

3. It is informed that no information is available in the IA.III – Infra-2 section of this Ministry. Further, it is noted that the above-mentioned Environmental Clearances (ECs) were issued by SEIAA, Haryana vide letter no. SEAC/HR/2024/067 (SLA/HR/INFRA2/468689/2024) dated 14.09.2024 and proposal no. SLA/HR/INFRA2/418061/2023 dated 08.12.2018. Also, the Consent to establish & Consent to operate of the above mentioned project issued by the State Pollution Control Board, Haryana. Therefore, the proposed project-related documents are not available with the CPIO.

4. Further, as per the Department of Personnel and Training OM dated 12.06.2008, para no. 3(iv), if a person makes an application to a public authority for some information which is under the jurisdiction of a public authority of any State Government or Union Territory Administration, the CPIO of the public authority receiving the application should inform the applicant that the information may be obtained from the concerned State Government/UT Administration. In such cases, the application need not be transferred to the State Government/UT Administration. In view of the above, you may kindly contact the Department of the Environment and SPCB, Government of Haryana.

5. Moreover, with reference to the queries raised in your application, it is submitted that as per the "Guidelines for the Officers designated as Central Public Information Officer (CPIO) under the Right to Information Act, 2005" vide OM No. 1/69/2007-IR dated 27.02.2008, point no. 8, only such information is required to be supplied under the Act which already exists and is held by the public authority or is under its control. The CPIO is not supposed to create information, interpret information, solve the problems raised by the applicants, or furnish replies to hypothetical questions. In view of the above, your RTI application regarding the IA – Infra 2 sector is disposed of.

6. In case, you are not satisfied with this reply, you may file an appeal before the First Appellate Authority (IA-Infra-II), FAA & Scientist 'E', Ministry of Environment, Forest and Climate Change, Indira Parvaran Bhawan, Jor Bagh, New Delhi within thirty days from the date of receipt of this letter.

Yours faithfully

S. X. 9/10/2025
 (Dr. S. Prabhu (IA-Infra-II))
 CPIO & Scientist D
 Email: p.subramani@gov.in

ANNEXURE A/4

CGWA RTI REPLY – GROUNDWATER REGULATION

Explanatory Note:-

(For Assistance of the Hon'ble Tribunal)

1. The Central Ground Water Authority (CGWA), in its RTI reply, has clarified that it does not exercise jurisdiction over groundwater regulation in the State of Haryana after 2021.
2. The RTI reply confirms that regulation of groundwater extraction in Haryana falls within the exclusive jurisdiction of the Haryana Water Resources Authority (HRWA).
3. No HRWA No Objection Certificate (NOC) for groundwater extraction has been placed on record by the Project Proponent or referred to by Respondent No. 3 in its Reply.
4. Accordingly, any groundwater extraction undertaken without prior permission of HRWA would be contrary to the applicable groundwater regulatory framework in Haryana.

(Original RTI reply follows)

भारत सरकार
जल शक्ति मंत्रालय
जल संसाधन, नदी विकास
और गंगा संरक्षण विभाग
केंद्रीय भूमि जल प्राधिकरण



Government of India
Ministry of Jal Shakti
Department of Water Resources,
River Development & Ganga Rejuvenation
Central Ground Water Authority

05-38/RTI/CGWA/Haryana/2025-26- 402

दिनांक:

24 SEP 2025

वा मे,

Sh. Ram Kishore
B-172, DLF Regal Gardens,
Sector 90, Gurugram,
Haryana-122505

विषय: सूचना का अधिकार अधिनियम, 2005 के आवेदन-पत्र के संबंध में।

ir,

This is reference to the RTI application dated NIL, received by CGWA on 23.09.2025 by offline mode and registered online vide Registration No. CGWBI/R/P/25/00163 dated 24.09.2025 regarding Groundwater NOCs and extraction permissions for DLF projects in Gurugram.

Groundwater Management and Development in the State of Haryana is being regulated & controlled by the Haryana Water Resource Authority, Haryana since 2021, it is requested to take up the matter with the concerned authority.

If the reply to the RTI queries is not satisfactory, then appeal against the reply may be made to the first appellate authority within 30 days from the date of receipt of reply as per provision at section 19 of the RTI Act 2005, whose details are as under;

Sh. Deepak Verma,
Joint Director (Stat.) & First Appellate Authority,
Central Ground Water Board, Bhujal Bhawan,
NH-IV, Faridabad (Haryana)-121001.

भवदीय,
24/9/2025
(विनोद कुमार ढौंडियाल)
प्रशासक एवं केन्द्रीय जन सूचना अधिकारी

C.S.M.R.S. Campus, Olof Palme Marg, Sector-3, Hauz Khas, New Delhi-110016
Ph- (011) 20863525; e-mail: cgwa@nic.in

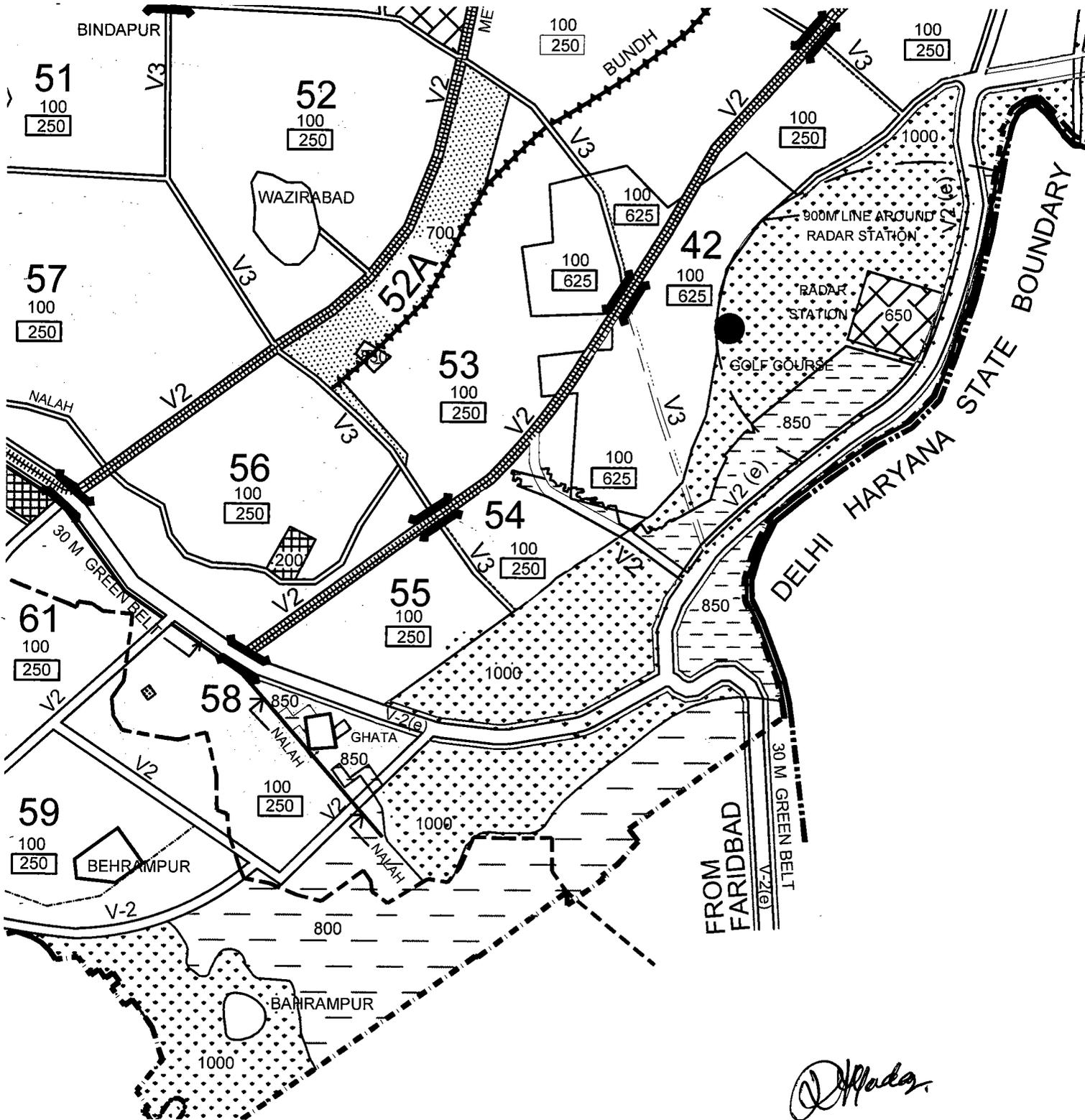
ANNEXURE A/5**GURUGRAM–MANESAR MASTER PLAN 2031 (NCZ EXTRACT)**

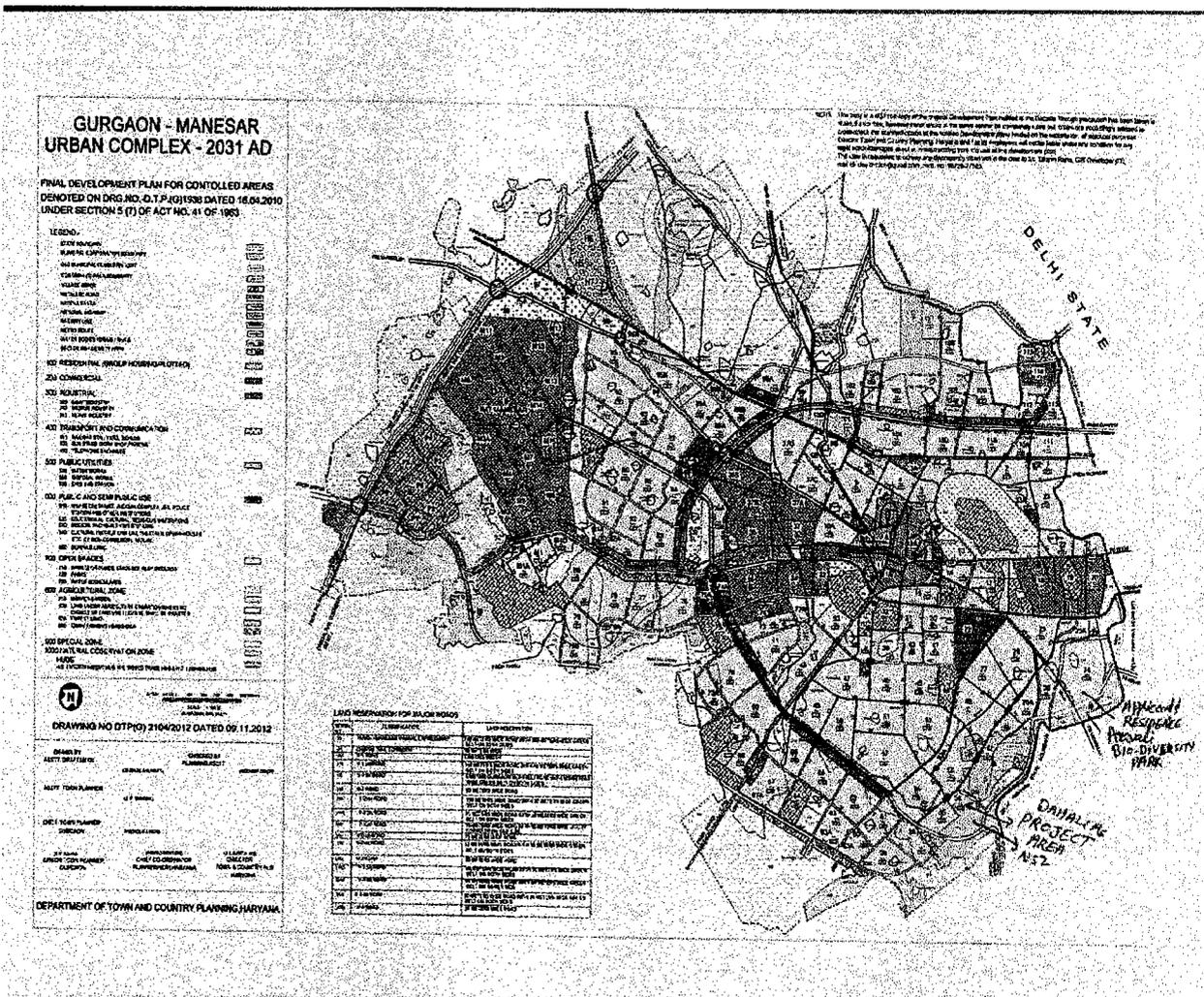
Explanatory Note:-

(For Assistance of the Hon'ble Tribunal)

1. The Gurugram–Manesar Master Plan 2031 classifies the land adjoining the project area as Natural Conservation Zone (NCZ-1000), which includes Aravalli hill slopes, rocky terrain and natural drainage features, as reflected in the annexed extract.
2. The project site is shown in immediate proximity to, and abutting the NCZ-1000 belt, as per the Master Plan extract.
3. Such proximity to the NCZ-1000 belt attracts heightened planning and environmental scrutiny under the Master Plan provisions and applicable environmental regulations.

(Original Master Plan extract follows)





Q. Jafar

ANNEXURE A/6**RECORD COMPARISON TABLE**

(Comparative Analysis of Project Disclosures and Statutory Approvals)

Explanatory Note (For Assistance of the Hon'ble Tribunal)

For Limited purpose only.

1. This table compares the project particulars disclosed for “DLF The Dahlias” (including RERA disclosures) with the Environmental Clearances (ECs) and Consents to Establish (CTEs) relied upon by Respondent No. 3.
2. The comparison demonstrates material mismatches in project name, plot area, FAR, location and project category.
3. The documents relied upon by Respondent No. 3 pertain to projects, land parcels or approval parameters other than those disclosed for “DLF The Dahlias”.
4. Accordingly, the table assists in demonstrating that the statutory approvals relied upon are not shown to be project-specific to “DLF” The Dahlias”

ANNEXURE A/6 - CONTRADICTION TABLE / RECORD COMPARISON TABLE

Parameter	RERA Registration (DLF - R16)	EC-1 (17.08.2022) Annexure R3-2	EC-2 (14.09.2024) Annexure R3-4	CTE-2 (2022)	CTE-2 (2024)	Final Contradiction / Legal Impact
Project Title	"DLF The Dahlias- Group Housing	"Group Housing Zone - 10 DLF-5"	"Crest Expansion Project (DLF -5)"	Zone -10 Housing	Crest- 5 Expansion	No EC exists for Dahlias (R-16)
Land Parcel / Zone	R-16 (Sector 54)	Zone – 10 Land Parcel not known	Crest or Different Project	Zone-10 Land Parcel diferent	Crest	Different parcels = EC legally invalid.
Plot Area	16.489 acres	- 7.57 acres	Crest expansion	As per EC-1	As per EC-2	None match Dahlias Plot area.
Total FAR/Built-up	4,01,100.656 Sqm	2,33,311.998 sqm	Crest FAR	Follows EC-1	Follows EC-2	Mismatch proves Dahlias never appraised
Project Category	Category A (Aravalli + ESZ + > 1.5 lakh sqm)	Category A	Not assessed	Category B	Category B	SEIAA has no jurisdiction - EC must be by MoEF & CC only.
Aravalli Verification	Not done	Not done	No report	Not done	Not done	Mandatory FCA/Aravalli appraisal missing.
Wildlife ESZ Distance	Not done ✓ Yes	No report	No report	xxx	xx visit	NBWL clearance compulsory - missing
Groundwater NOC	No HRWA NOC (Over-exploited block)	Not enclosed	Not enclosed	Not enclosed	Not enclosed	Illegal construction HRWA permission mandatory.
HCPCB site Inspection	No Inspection done	No report filed	No report filed	No report file	No site visit	CTE issued blindly without statutory verification
Relevance to Dahlias?	✓ YES	X No	X No	X No	X No	HSPCB relied of irrelevant non-Dahlias documents

ANNEXURE A/7

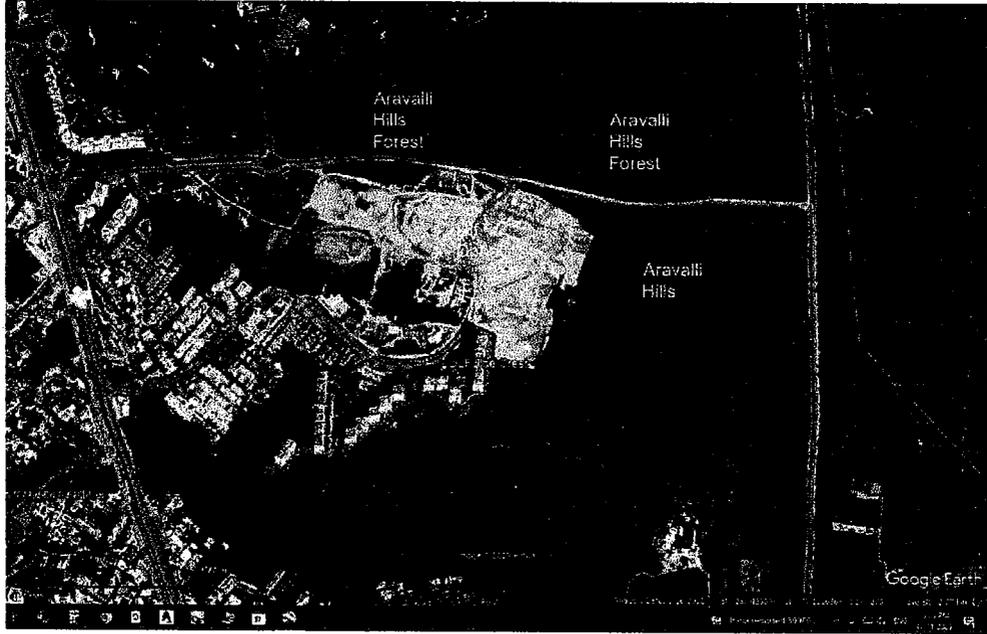
SATELLITE IMAGERY (2023–2025)

Explanatory Note:- For Assistance of the Hon'ble Tribunal

(Limited Purpose)

1. Satellite imagery placed on record reflects progressive land disturbance over the period 2023–2025.
2. The imagery demonstrates continuity and scale of site disturbance and physical land alteration over time.
3. The imagery is relied upon only for the limited purpose of demonstrating physical alteration of land and continuity of site activity, and not as an independent determination of legality.

(Satellite images follow)



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Q. Madan

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ANNEXURE A/8**SITE PHOTOGRAPHS – EXCAVATION & HEAVY MACHINERY****Explanatory Note:- For Assistance of the Hon'ble Tribunal.**

1. The site photographs depict deployment of heavy construction machinery and substantial excavation activity at the project site.
2. The photographs corroborate the satellite imagery placed at Annexure A/7, indicating continuity and scale of site activity.
3. These photographs are relied upon only for the limited purpose of demonstrating the nature and scale of on-ground activity, and not as an independent determination of legality.

(Original photographs follow)

