

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**  
**PRINCIPAL BENCH AT NEW DELHI**  
**ORIGINAL APPLICATION NO. 680 OF 2024**

**IN THE MATTER OF:**

Vaishali Rana & Anr. ... Applicants  
 Versus  
 State of Haryana & Ors. ... Respondents

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**Through**

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**RAHUL CHOUDHARY**

**SHREEPURNA DASGUPTA**  
**ADVOCATES**

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Place:- New Delhi

Dated:- 05.08.2025

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**  
**PRINCIPAL BENCH AT NEW DELHI**  
**ORIGINAL APPLICATION NO. 680 OF 2024**

**IN THE MATTER OF:**

Vaishali Rana & Anr. ... Applicants  
Versus  
State of Haryana & Ors. ... Respondents

**REJOINDER ON BEHALF OF THE APPLICANTS TO THE REPLY FILED  
BY RESPONDENT NO. 1,2,3 & 4 DATED 2.04.2025 AND REPLY FILED  
BY RESPONDENT NO. 3 DATED 2.04.2025**

**MOST RESPECTFULLY SHOWETH:**

1. That the above-titled Application is raising substantial question relating to the environment arising out of the arbitrary and indiscriminate felling of trees within the urban areas of Gurugram as well as permission granted without due diligence, application of mind and without assessing the necessity for the tree felling. Such mindless felling of urban trees to promote construction of multi-storeyed structures, raises substantial question concerning the pollution levels in Gurugram, which is significantly higher than other metropolitan cities in the country.
2. That vide order dated 4.07.2024, this Hon'ble Tribunal issued notice to all the Respondents and directed them to file their reply to the same. Vide Reply dated 2.04.2025, the Respondent No. 1,2,3 and 4 and Respondent No. 3, separately filed their replies. The Applicant No. 1 though the present Rejoinder is filing response to the averments made in the Replies mentioned above.
3. It is submitted that the Applicant denies all averments made in the Replies dated 2.04.2025 by the Respondent No. 1,2,3 and 4 and Respondent No. 3 separately, unless expressly admitted or are part of matter of record.

**I. Rejoinder to Reply filed by Respondent No. 1,2,3 and 4 dated 2.04.2025**

4. That at the outset, it is submitted that the Reply is devoid of merits and does not contain substantial aspects to the relief sought by the Applicant i.e. introduction of proper policies and guidelines for felling of trees in light of the directions of the Hon'ble Supreme Court in ***Association for Protection of Democratic Rights & Anr. v. State of West Bengal [SLP No. 25047 of 2018]***, directions of the Hon'ble Tribunal in ***Green Earth v. Dy. Commissioner [O.A. No. 374 of 2022]*** and other laws in place.
5. That the contents of Para 1 to 6 require no response from the Applicant.
6. That in response to Para 7, the Respondents have in principle admitted that concerned trees such as Eucalyptus, Poplar, Ailanthus, Bakayan, Amrood, Bans (Bamboo), Sahtoot have been exempted even in areas notified under Section 4 of PLPA for promotion of agroforestry and increasing income of farmers, as raised by the Application in the above-titled Original Application. However, the Respondents have failed to recognize the issue mentioned in Para 43 of the above-titled Original Application that the said trees do not pose a threat to urban areas and is only limited to agricultural areas. Therefore, the indiscriminate felling of the said trees should be valued for the ecological benefits they provide. It is submitted that trees in general are known to have immense absorption capacity of various air pollutants. Trees not only soak up carbon dioxide, they also absorb other harmful gases, such as carbon monoxide, sulfur dioxide and nitrogen dioxide. The leaves and tiny twigs of the canopy catch larger particulates as well, much like a giant air filter. Therefore, the exemption granted to the above-mentioned trees which do not pose any threat to the urban areas, and are beneficial in absorbing the air pollutants in the air of Gurugram is arbitrary.

7. That the contents of Para 8 to 13 of the Reply do not relate to policies or guidelines for felling of trees in Gurugram.
8. That the Respondents in Para 14 of the Reply have responded to only few and selective issues and have not responded to the issues raised by the Applicant regarding arbitrary felling of trees without any ecological value calculated. Following is a detailed table of their reply in Para 14 and the Applicant's response to that based on contentions raised in the Original Application:

<b>Contentions mentioned by Respondent 1,2,3 and 4 in Reply dated 2.04.2025</b>	<b>Response of the Applicant</b>
14.1) Regulation on tree felling which is not applicable in Manesar and Farukhnagar Tehsils of District Gurugram. A proposal has been forwarded to the Government for including the leftover tehsils in notification dated 04.01.2013. The copy of the proposal is annexed as Annexure-R-9.	It is submitted that such a proposal has been forwarded to the State Government on 20.02.2025 (Annexure R-9). However, no further progress has been made to such a proposal.
14.2) The compensation imposed for illegal tree felling is very less i.e. Rs. 500/-. A proposal for increasing the compensation is also under consideration of the Government.	<ul style="list-style-type: none"> <li>No details have been attached to show such proposal sent to the Government for increasing the compensation limit. The penalty amount is meagre and outdated as imposed under the Section 67 of the Indian Forest</li> </ul>

	<p>Act, 1927 which does not account of the ecological value of the tree.</p> <ul style="list-style-type: none"> <li>• Further, no penalty imposed on the violators by the Forest Department to undertake compensatory plantation in lieu of the illegal felling of tree done.</li> </ul>
<p>14.3) The tree felling is permissible only for bonafide domestic use as per rules framed under General Section 4 of PLPA 1900. Every care is taken and tree felling is not granted for any timber extraction purposes.</p>	<ul style="list-style-type: none"> <li>• It is submitted that the permissions for tree felling are not only for domestic or agricultural purposes, but also for other developmental activities.</li> <li>• Under the garb of the tree felling permissions, no monitoring mechanism is being observed regarding the requirement of compensatory plantation in the permits.</li> <li>• Further, where permits are being granted by the DFO, no ecological value of the tree felled is being assessed as compensation, in accordance to the interim order of the Hon'ble Supreme Court in <b><i>Association for Protection of Democratic Rights &amp; Anr. v. State of West</i></b></li> </ul>

	<b><i>Bengal</i> [SLP No. 25047 of 2018]</b>
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9. That however, the concerned Respondents have not responded to the issue raised by the Applicant on monitoring mechanism of the compensatory plantation for every tree felled. Further, the Respondents have not responded to the following contentions raised in the Original Application:
- a. The permissions for tree felling are being granted as a mechanical exercise, without any due diligence and application of mind, and without assessing the necessity for felling of the trees. Here, the ecological value of the tree and the necessity for the felling of the tree in light of Notification dated 4.01.2013 is not being assessed
  - b. Compensatory plantation for each tree felled is not being ensured by the permission holders wherein a minimum of five to ten times of the trees are required to be planted
  - c. The indiscriminate tree felling of urban trees is against the National Forest Policy, 1988 and the Haryana State Forest Policy, 2006. The National Forest Policy provides that land laws should be modified in such a manner to promote tree plantation on private land. Further, appropriate regulations should be formulated to govern tree felling on private holding.
  - d. There is no proper regulatory mechanism introduced for tree felling till date, as directed by the order of the Hon'ble Tribunal dated 01.07.2022 in ***Green Earth v Dy. Commissioner [O.A. No. 374/2022]***. It is important to note that there is no central legislation or regulation for the preservation of trees in urban areas. Such laws have been enacted in certain states such as Karnataka, Delhi, Goa, and others.

**II. Rejoinder to Reply dated 2.04.2025 filed by the Respondent****No. 3:**

10. That at the outset, the Applicant submits that the Reply by Respondent No. 3 does not mention anything regarding any mechanism or policy with forest conservation as an aim. Further, nothing has been mentioned in the Reply regarding any mechanism wherein illegal felling of trees are concerned. There is also nothing on record to show any mechanism has been used to determine the ecological value of each tree felled.
11. That the Respondent No. 3 at Para 6-8, Page 308 of the above-mentioned Reply has stated that they have started putting a condition of compensatory plantation, which has drastically reduced illicit tree felling. It is submitted that the Respondent No. 3 has not put any data regarding the compliance of such conditions and as to how many trees have been planted for compensatory plantation.
12. That the Respondent in Para 5, Para-wise Reply (Pg. 309-310) of the above-mentioned Reply has incorrectly stated that the Notification dated 4.01.2013 allows for felling of trees for *bona fide* purpose, including infrastructure development, subject to the approval of competent authorities. It is submitted that on a brief reading of the Notification dated 4.01.2013, it does not permit for tree felling for any infrastructure purposes, but only for *bona fide* domestic and agricultural purposes of the right holder of the land. On the contrary, the Forest Department is issuing notices to multiple persons interested in development activity, which is in violation of Notification dated 4.01.2013 issued under Section 4 of the Punjab Land Preservation Act, 1900.
13. That in support of the above-mentioned para, in the newspaper article titled "'No' to 'yes' in 3 wks: Forest dept gives nod to chop 93 trees for

*luxury condo*" dated 31.01.2025, the former conservator of forest (south Haryana) stated that:

*"Former conservator of forest (south Haryana) RP Balwan pointed out that **permission to chop trees in areas notified under Section 4 of Punjab Land Preservation Act (PLPA) – as these parcels of land are – can only be given for domestic or agricultural purposes for inhabitants.** "In this case, the realtor is neither an inhabitant nor is it planning to use the land for domestic or agricultural purposes, so such tree-felling permission need not be approved in the first place. The realtor aims to earn profit by selling houses, so it is purely for business," Balwan said."*

A copy of the newspaper article titled *"No' to 'yes' in 3 wks: Forest dept gives nod to chop 93 trees for luxury condo"* dated 31.01.2025 is annexed herewith as **ANNEXURE A-1.**

14. That the Respondent No. 3 has not responded to the contention made in Para 11 of the Original Application wherein the Applicant has annexed a newspaper article wherein the Chief conservator of Forests (South Haryana) has themselves stated that Gurgaon's tree cover will take a major hit if practices of tree felling continue unabated.
15. That further, the Applicant submits that multiple tree felling permits have been granted to the permit holders. However, the aspect of compliance of compensatory plantation is still foreign. For instance, a tree felling permit was issued to DLF Ltd. for felling of 423 trees in Wazirabad, Gurgaon on 14.02.2025. As per the permission conditions, following compensatory condition was imposed:

*"12. Approved With The Condition That The Permission For The Area For Which Building Plan Has Been Approved By Country & Town Planning Department Applicant Must Plant 10x Saplings In A Lieu Of Felling Trees. Permission Is Valid Fo 03 Months Form The Date Of Issuance."*

It is submitted that as for the permission issued for such large amount of trees, compensatory plantation of 10x trees that is 4230 trees are required to be undertaken by the permit holder. However, when and where such exercise is to be taken has not been mentioned, neither the

department has sought a compliance report from the permit holder. Such condition imposed in the permits seem like a mechanical exercise undertaken by the Forest Department and holds no value to safeguard the ecology of the area. Therefore, the statement made in Para 5 (ii to v) of Para-wise Reply at Page 310, that adequate compensatory plantation is undertaken in accordance with applicable guidelines is fallacious, and must not be accepted.

A copy of the permission dated 14.02.2025 issued by the Forest Department to DLF Ltd. for felling of 423 trees is annexed herewith as **ANNEXURE A-2.**

16. It is submitted that there are multiple such cases where tree felling permits have been granted without monitoring of the compensatory plantation, or illegally trees have been felled. As per news article dated 17.04.2025 titled "*Gurgaon's green cover under threat: Illegal tree felling goes unchecked, foresters face fire*", it was stated that where permissions were given for a limited number of trees, more trees were felled than the permitted amount. The Applicant has complained multiple times to the authorities in the past few months, however, no action has been taken by the authorities.

A copy of the news article dated 17.04.2025 titled "*Gurgaon's green cover under threat: Illegal tree felling goes unchecked, foresters face fire*" is annexed herewith as **ANNEXURE A-3.**

A copy of the complaint sent by the Applicant is annexed herewith as **ANNEXURE A-4 (Colly).**

17. That based on the above-mentioned submissions, the prayers of the Respondent No. 1 to 4 are untenable. Hence, this Hon'ble Tribunal may be pleased to consider the prayers of the Applicant in the above-titled Original Application.

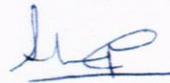
18 ) Pass any other orders as this Hon'ble Tribunal may deem fit and proper  
in the facts and circumstances of the instant case.



**APPLICANT NO. 1**

THROUGH





**RITWICK DUTTA RAHUL CHOUDHARY SHREEPURNA DASGUPTA**  
**ADVOCATES**

COUNSELS FOR THE APPLICANT

N-73, LOWER GROUND FLOOR, GREATER KAILASH-I,  
NEW DELHI-110048

MOBILE NO: 9312407881

Email: litigation@dclawchambers.com

**Place: New Delhi**

**VERIFICATION:**

Verified by Vaishali Rana, d/o Lt. Col. H.S. Rana, aged about 49 years, R/o  
1403, T-10, Valley View Estate, Gwalpahari, Gurgaon Faridabad Road,  
Gurgaon122003 that the contents of Paragraphs 1 to 18 are true to my  
personal knowledge and nothing material has been concealed therefrom.



**APPLICANT NO. 1**

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

ORIGINAL APPLICATION NO. 680 OF 2024

**IN THE MATTER OF:**

VAISHALI RANA & ORS.

... APPLICANTS

VERSUS

STATE OF HARYANA & ORS.

... RESPONDENTS

**AFFIDAVIT**

I, Vaishali Rana, d/o Lt. Col. H.S. Rana, aged about 49 years, R/o 1403, T-10, Valley View Estate, Gwalpahari, Gurgaon Faridabad Road, Gurgaon122003, do hereby solemnly affirm and declare as under:

1. That I am the Applicant No. 1 in the above titled Original Application and conversant with the facts and circumstances of the case and competent to swear this affidavit.
2. That the contents of the accompanying Rejoinder are true and correct and nothing material has been concealed therefrom.

*Handwritten note:*

*Identify the Deponent, who has signed, put 1. Refers me*



**DEPONENT**

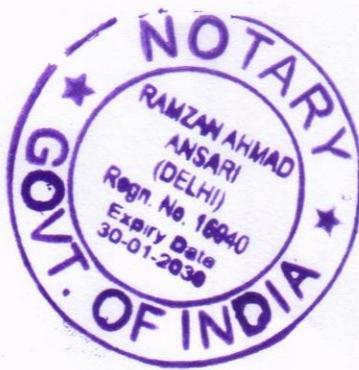
**VERIFICATION**

*4 AUG 2025*

Verified on this \_\_\_\_ day of \_\_\_\_\_, 2025 that the contents of the present affidavit are true and correct to my knowledge and belief and nothing material has been concealed therefrom.



**DEPONENT**



CERTIFIED THAT THE DEPONENT has solemnly affirmed before me that the contents of the above which have been read & explained to him/her are true and correct to his/her knowledge.  
NOTARY DELHI INDIA

*4 AUG 2025*

# 'No' to 'yes' in 3 wks: Forest dept gives nod to chop 93 trees for luxury condo

Jan 31, 2025, 12.35 AM IST



Gurgaon: After rejecting an application to chop 93 trees for a luxury condominium project in a forested area just off Golf Course Road, the Haryana forest department three weeks later granted permission to a real estate company. The approval came without a detailed compensatory afforestation plan being submitted.

Environmentalists and legal experts said apart from not following the norm on compensatory afforestation, permission to axe 93 trees is illegal because the Aravali area where the realtor wants to build the luxury houses has all characteristics of a "deemed forest".

Though it is not officially designated as a "forest" by Haryana govt, the area ought to be protected under the Forest (Conservation)

Act as directed by Supreme Court in its 1996 ruling in the TN Godavarman vs Union of India case.

In this landmark order, the top court had said that any area that meets the "dictionary definition" of forest must be protected under FCA regardless of its official designation in govt records. Last year, Supreme Court reiterated this judgment and told the Centre and all state govts to go by this broader definition of forest.

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"Although the definition of Aravalis and 'forest' is yet to be finalised in Haryana, this area falls within foothills of the Aravalis. On initial observation, it appears to be a deemed forest. Hence, non-forest activities should not be permitted," said Gaurav Bansal, a senior Supreme Court advocate.

According to documents reviewed by TOI, the real estate company filed six applications separately to the forest department between Oct and Dec last year. In all, permissions were sought to fell a total of 350 trees for the same project.

On Dec 3, 2024, the forest department rejected one of the six applications for chopping 93 trees and said in its response to the realtor: "Applicant may be directed to apply tree felling of one project through one application."

But on Dec 24, the forest department approved the same application, saying: "Permission is granted for felling 93 trees and transplant of 01 Pipal tree."

The department's revised decision noted that the developer must "plant saplings ten times" the number of trees that will be chopped, but there was no mention of where or when this plantation drive will be carried out.

Guidelines say that a compensatory afforestation plan must be submitted at the time of seeking approval to chop trees. In the days between these two notices, the conservator of forests for south Haryana was replaced on Dec 16.

Decisions on the remaining five applications by the realtor to fell trees for the project are pending.

"How is it possible that tree-felling permission is given in a deemed forest area? The said area is a forest. The forest department first rejected the application, but now it has approved it. It seems that they are under pressure to do so," said Vaishali Rana, trustee of the Aravalli Bachao Citizens Movement.

Col SS Oberoi (retd), a city-based environment activist and an Aravali expert, said: "Why clear out an area that has good forest cover? Deemed forest areas need to be protected as non-forest activities are not allowed. Non-forest

activities are not allowed in such areas. When the city and the region are already losing tree cover rapidly, it is not logical to fell more trees for a luxury housing project."

Environmentalists drew parallels between this instance and the 2019 controversy around land in Faridabad's Sarai Khawaja, which was owned by a telecom company but construction was barred there after it was termed a 'deemed forest' in an order by the National Green Tribunal (NGT).

"Google imagery clearly shows that 3.9 acres of Aravalis have been cleared (off GCR). This case is similar to the Airtel case. It seems that permission (for chopping 93 trees) was given in Dec 2024, more than six months after this area was cleared (for construction already going on in the area)," said Chetan Agarwal, a forest analyst.

Former conservator of forest (south Haryana) RP Balwan pointed out that permission to chop trees in areas notified under Section 4 of Punjab Land Preservation Act (PLPA) – as these parcels of land are – can only be given for domestic or agricultural purposes for inhabitants. "In this case, the realtor is neither an inhabitant nor is it planning to use the land for domestic or agricultural purposes, so such tree-felling permission need not be approved in the first place. The realtor aims to earn profit by selling houses, so it is purely for business," Balwan said.

Officials of the forest department did not respond to multiple requests for comment till Thursday night.



प्रभागीय वन अधिकारी द्वारा अनुमति पत्र  
Permission letter by  
Concerned Divisional Forest Officer



हरियाणा सरकार / Government of Haryana

हरियाणा भू-परिक्षण अधिनियम, 1900 (1900 का पंजाब का अधिनियम II) की धारा-4 के अधीन अधिसूचित भूमि में वृक्षों की कटाई और वृक्ष ट्रांजिट/ प्रत्यारोपण की अनुमति।

Permission for felling of trees in areas notified under general section-4 of Haryana Land and Preservation Act, 1900 (Punjab Act II of 1900) and tree transit/transplantation.

नाम Name	जावेद इक़बाल Javed Iqbal
संगठन का नाम Organisation Name	DLF LIMITED
वर्तमान पता Current Address	Dlf Ltd., Shopping Mall Complex, Third Floor, Arjun Marg, Dlf Phase-i, Gurugram-122002
भूमि स्थान Land Location	WAZIRABAD , Gurgaon (Haryana),
भूमि मापन Land Measurements	1.999(Acre)
खसरा/ प्लॉट नम्बर Khasra/Plot Number	2041/2, 2042/1, 2042/2/2, 2043/1/2, 2043/2,2043/3/1
रेंज अफसर का नाम Range Officer Name	Sushil Kumar

Reference No. (SRN):-MTH-QQ7-X153

जारी करने की तिथि / Date of Issuance: 14-02-2025

जारी करने का स्थान / Place of Issuance: Gurgaon

जारी करने वाला प्राधिकरण / Issuing Authority: Divisional Forest Officer (Raj Kumar)



This is a Digitally Signed Certificate and does not require physical signature. The authenticity of this certificate can be verified from the verification link mentioned below:

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



हरियाणा भू-परिक्षण अधिनियम, 1900 (1900 का पंजाब का अधिनियम II) की धारा-4 के अधीन अधिसूचित भूमि में वृक्षों की कटाई और वृक्ष ट्रांजिट/ प्रत्यारोपण की अनुमति।

Permission for felling of trees in areas notified under general section-4 of Haryana Land and Preservation Act, 1900 (Punjab Act II of 1900) and tree transit/transplantation.

Species	Classwise number of trees								Total no. of trees	Total Volume (M3)
	V	IV	III	IIA	IIB	IA	IB	Under Size Trees		
Totlas	16	3	0	0	0	0	0	0	19	1.38
Papri	3	0	0	0	0	0	0	0	3	0.18
Casuarina	4	1	0	0	0	0	0	0	5	0.38
Shisham	3	0	0	0	0	0	0	0	3	0.18
Ber	1	0	0	0	0	0	0	0	1	0.06
Muskat	283	24	0	0	0	0	0	85	392	20.34
Total	310	28	0	0	0	0	0	85	423	22.52

जारी करने की तिथि / Date of Issuance: 14-02-2025  
जारी करने का स्थान / Place of Issuance: Gurgaon  
जारी करने वाला प्राधिकरण / Issuing Authority: Divisional Forest Officer (Raj Kumar)



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



हरियाणा भू-परिक्षण अधिनियम, 1900 (1900 का पंजाब का अधिनियम II) की धारा-4 के अधीन अधिसूचित भूमि में वृक्षों की कटाई और वृक्ष ट्रांजिट/ प्रत्यारोपण की अनुमति।

Permission for felling of trees in areas notified under general section-4 of Haryana Land and Preservation Act, 1900 (Punjab Act II of 1900) and tree transit/transplantation.

Applicant Javed Iqbal located at village Wazirabad district Gurgaon made a proposal to fell trees on this land with Khasra/ Plot number -.  
The report submitted by RFO, Sushil Kumar dated 14-02-2025.

CONDITIONS OF PERMIT

1. Only the numbered trees will be felled.
2. Trees to be felled will not be uprooted except in case of developmental works/ Individual plots.
3. No dragging of wood will be permitted.
4. Felling after sun set and before the sun rise will not be permitted.
5. No fire will be allowed.
6. No damage to unmarked trees will be caused during felling in the area and the owner will have to pay the compensation as determined by DFO for any such damage.
7. The owner of land shall be responsible for any illicit felling in the area and he will have to pay the compensation as determined by DFO for any such illicit felling.
8. No forest produce will be removed without a Rawana Challan from concerned Range Officer.
9. The permit is liable to be cancelled at any time if any violations of conditions of permit take place / facts given in the application for permit are found incorrect. The decision of DFO in this regard will be final.
10. The forest department does not hold any responsibility for distribution of sale proceeds among the owners of the land.
11. No separate permit for timber transit as per Indian Forest Act, 1927 is required within the territory of Haryana.
12. Approved With The Condition That The Permission For The Area For Which Building Plan Has Been Approved By Country & Town Planning Department Applicant Must Plant 10x Saplings In A Lieu Of Felling Trees. Permission Is Valid For 03 Months From The Date Of Issuance.



Date: 14-02-2025  
Place: Gurgaon

Raj Kumar  
(Divisional Forest Officer)

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**THE TIMES OF INDIA****Annexure A-3**

# Gurgaon's green cover under threat: Illegal tree felling goes unchecked, foresters face fire

Apr 17, 2025, 01:13 AM IST



Gurgaon: Numerous trees are still being cut down in the city without authorisation despite a petition in NGT alleging indiscriminate tree felling. In a letter to the ministry of environment, forest and climate change of India (MoEF) and principal chief conservator of forests (Haryana), a group of activists has alleged that the forest department is allowing these "egregious violations".

The activists have pointed out that illegal tree felling activities have been reported in DLF 1, allegedly facilitated by forest department officials.

The complaint — by Vaishali Rana and two other activists — urges the immediate suspension of the involved officials, a comprehensive audit of recent tree felling permissions and the establishment of transparent oversight mechanisms. Forest officials said they were not aware of the complaint. "We will look into the matter," divisional forest officer Raj Kumar said on Wednesday.

The activists' complaint has highlighted the involvement of officials in granting unauthorised permissions for tree cutting, violating the Punjab Land Preservation Act (PLPA) Section 4 rules. For instance, in DLF 1, two trees located in the green belt outside the property were falsely shown as inside the plot to obtain felling permission.

Similarly, in Sikanderpur, permission was granted to cut three trees, but five were felled, including three that could have been saved. This indicates a serious breach of the approved limit. The petition has sought legal protection for trees in Haryana. The complaint said, "In Plot E 12/43, DLF 1, Chakkarpur, two trees located in the green belt outside the property were falsely shown as inside the plot to obtain felling permission.

In Plot B 19/9, DLF 1, Chakkarpur, one tree was already felled and another, located outside the plot, has been barricaded, indicating potential intent to fell it.

In Plot 12, Block F, DLF 1, Road 9, Sikanderpur, permission was granted to cut three trees, but five were felled, including three that could have been saved. This indicates a serious breach of the approved limit.

In Plot 17, Block C, Road 8, DLF 1, Chakkarpur, a huge Pilkhan tree was pruned under the wrong category, leading to significant damage. A forest ranger and another forester are involved in this."

The city, with a tree cover of only around 12%, is witnessing a rapid decline in its green cover due to such illegal activities. The Haryana Forest Policy aimed to increase tree cover to 20% by 2020, a goal that remains unmet. The air quality here has also been severely affected, with the city ranking 7th in the list of cities with the worst air quality in March 2025.

An independent investigation needs to be initiated into the role of forest officials, Rana said, adding, "suspension of both officials pending inquiry", a comprehensive audit of all recent tree felling permissions in the city and strict disciplinary and legal action against those found guilty have been demanded.

Rana has sought "establishment of GPS-based oversight mechanisms for future permissions and suspension of all tree felling permissions in the city until the NGT order in OA 680/2024".



----- Forwarded Message -----

From: Vaishali Rana <vaishali2013.vrc@gmail.com>

Date: On Monday, July 28th, 2025 at 19:07

Subject: Fwd: Complaint Against RO Sushil Kumar and Forest Daroga Ompal of Forest dept Gurgaon, Haryana for Facilitating Illegal Tree Felling in DLF Phase 1 & other areas in Gurgaon, violating PLPA sec 4 rules, while matter for trees' protection is subjudice in OA 680/2024

To: shreepurnadasgupta@proton.me <shreepurnadasgupta@proton.me>

----- Forwarded message -----

From: **Vaishali Rana** <[vaishali2013.vrc@gmail.com](mailto:vaishali2013.vrc@gmail.com)>

Date: Wed, 16 Apr, 2025, 05:40

Subject: Complaint Against RO Sushil Kumar and Forest Daroga Ompal of Forest dept Gurgaon, Haryana for Facilitating Illegal Tree Felling in DLF Phase 1 & other areas in Gurgaon, violating PLPA sec 4 rules, while matter for trees' protection is subjudice in OA 680/2024

To: <[fpd-moefcc@gov.in](mailto:fpd-moefcc@gov.in)>, <[ronz.ravinderto-mef@gov.in](mailto:ronz.ravinderto-mef@gov.in)>, <[igf.su-moefcc@gov.in](mailto:igf.su-moefcc@gov.in)>

Cc: <[pccf-hry@nic.in](mailto:pccf-hry@nic.in)>, <[Pspccf@gmail.com](mailto:Pspccf@gmail.com)>, <[cs@hry.nic.in](mailto:cs@hry.nic.in)>, CCF, South Circle, Gurugram

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<[dfogurgaon1@gmail.com](mailto:dfogurgaon1@gmail.com)>, <[ronz.chd-mef@nic.in](mailto:ronz.chd-mef@nic.in)>, <[dcgrg@hry.nic.in](mailto:dcgrg@hry.nic.in)>,

<[cmharyana@nic.in](mailto:cmharyana@nic.in)>, <[cmharyana14@gmail.com](mailto:cmharyana14@gmail.com)>, Niji Sahayak <[papccf@gmail.com](mailto:papccf@gmail.com)>

To

Forest Protection Division  
MoFF&CC  
Indira Paryavaran Bhawan  
Jorbagh Road  
New Delhi – 110 003

The Principal Chief Conservator of Forests  
Forest Department,  
Panchkula, Haryana

RO  
MoEF&CC

Integrated Regional Office Bays No. 24-25, Sector 31 A,  
Dakshin Marg, Chandigarh – 160030

Chief Secretary  
4th Floor, Haryana Civil Secretariat, Sector-1,  
Chandigarh.

Subject : Complaint Against RO Sushil Kumar and Forest Daroga Ompal of Forest dept Gurgaon, Haryana for Facilitating Illegal Tree Felling in DLF Phase 1 & other areas in Gurgaon, violating PLPA sec 4 rules, while matter for trees' protection is subjudice in OA 680/2024

Sir,

I am writing to formally file a complaint regarding illegal tree felling activities in DLF Phase 1, Gurgaon, which have taken place with the active facilitation and misuse of authority by the RO, Mr. Sushil Kumar, and Forest Daroga, Mr. Ompal, both currently posted in Gurgaon.

I have personally documented and videographed 3 separate incidents on 8th April 2025, & another later, which clearly demonstrate the illegal tree felling and complicity of the officials involved:

1. **Plot E 12/43, DLF 1, Chakkarpur** – Two trees were located outside the boundary wall of the said property in the GREEN BELT. Despite this, official permission was granted to fell them by falsely showing them as inside the plot by RO Sushil Kumar & Daroga Ompal. I met Daroga Ompal on site but he had no answers!! Both of them have been doing fraudulent inspections.
2. **Plot B 19/9, DLF 1, Chakkarpur** – One tree has already been felled. A second tree, located at the corner of the plot, outside, has not yet been cut but has been barricaded and enclosed into the plot's premises, indicating potential intent to fell it despite its savable location.
3. **Plot 12, Block F DLF 1, Road 9, Sikanderpur** - Permission was granted to cut 3 trees, however, 5 trees have been felled, including 3 in absolute corners which could have been saved, indicating a serious breach of the approved limit. Also, as per the gate requirements under Town & Country planning guidelines, it's only 10 feet gate recommendation, & not end to end entrance gates, all along the facade of the building which are made illegally by builders to accommodate the cars in stilt parkings, which consequently leaves no space for a tree or trees to be in front of the building!! The existing trees at the facade of the building are considered as a roadblock and hence chopped down!
4. **Plot 17, Block C, Rod 8, DLF 1, Chakkarpur** - Permission was given to prune a huge Pilkhan tree (see attachments) on the inspection of Daroga Ompal & **RO Sushil Kumar, under the category 1B, which is NOT the category for pruning of branches, but is for trunks.** And, RO

Sushil Kumar has shown it as a branch & recommends pruning of 3.5 cubic meter under category IB !!!! That's MASSACRE of a fully grown tree & reflects malfeasance and fraud on his part!!!

**These are not isolated events but are indicative of a disturbing pattern of collusion and malpractice by RO & Daroga (those entrusted with enforcing the law). The deliberate misrepresentation of tree locations and manipulation of permission limits demonstrates a clear abuse of power and breach of public trust.**

This is especially concerning given the broader environmental context. Gurgaon currently has a tree cover of only around 12%, and this is shrinking year by year due to such unchecked illegal activities. The **Haryana Forest Policy had a target of increasing tree cover to 20% by 2020, but this goal remains unmet largely due to such malfeasance of your staff!!**. Instead of expanding our green cover, we are watching it vanish at the hands of those who should be protecting it.

The seriousness of the situation is underlined by Times of India **article dated 9th April 2025, titled "GURGAON 7th , CHARKHI DADRI 8th IN LIST OF CITIES WITH WORST AIR QUALITY THIS MARCH" (attached), which ranked Gurgaon as 7th in the country for the highest AQI levels in March 2025. THANKS TO FOREST DEPT GURGAON, HARYANA,** Our city is fast becoming a gas chamber and an urban heat island! Destruction of trees is a direct contributor to this environmental and public health disaster.

To protect what remains, we filed a petition before (NGT) under OA No. 680 of 2024, seeking legal protection for every tree in Haryana, particularly in urban districts like Gurgaon and Faridabad,ie., DELHI-NCR. However, such illegal activities by forest department officers directly undermine these efforts and mock the rule of law.

In light of the above, I urge your office to:

1. Immediately initiate a detailed, independent investigation into the role of R.O. Sushil Kumar and Daroga Ompal in facilitating illegal tree felling.
2. Suspend both officials pending inquiry to prevent further damage or tampering with evidence.
3. Conduct a comprehensive audit of all recent tree felling permissions in Gurgaon, particularly in DLF Phase 1 and similar residential areas.
4. Take strict disciplinary and legal action against those found guilty.
5. Establish transparent, GPS-based oversight mechanisms for future permissions and involve public access to ensure accountability.
6. Immediately SUSPEND ALL TREE FELLING PERMISSIONS in Gurgaon, till an order is given by NGT in matter of OA 680/2024, concerning the same issues, to which your department is a respondent.

I am prepared to share all video and photographic documentation, along with exact locations, dates, and site details for each of these incidents.

Regards

Vaishali Rana (98990 78299)  
Applicant in matter OA 680/2024

----- Forwarded message -----

From: **Vaishali Rana Chandra** <[vaishali2013.vrc@gmail.com](mailto:vaishali2013.vrc@gmail.com)>

Date: Thu, 6 Jan, 2022, 17:55

Subject: Regarding Protection for every single tree 🌳 growing in jurisdiction of Municipal Corporation Gurgaon + GMDA + HSVP; flawed building plans allowing end to end gates and stilt parking; necessity for a stringent TREE ACT like neighbouring Delhi; & zilch efforts from CM office

To: <[cmharyana14@gmail.com](mailto:cmharyana14@gmail.com)>, <[cmharyana@nic.in](mailto:cmharyana@nic.in)>

Cc: <[deputycmharyana@gmail.com](mailto:deputycmharyana@gmail.com)>, <[dulbhry@hry.nic.in](mailto:dulbhry@hry.nic.in)>, <[ulbhry@gmail.com](mailto:ulbhry@gmail.com)>, <[cs@hry.nic.in](mailto:cs@hry.nic.in)>, Niji Sahayak <[papccf@gmail.com](mailto:papccf@gmail.com)>, <[Pspccf@gmail.com](mailto:Pspccf@gmail.com)>, Director General <[tcpharyana3@gmail.com](mailto:tcpharyana3@gmail.com)>, <[tcpharyana7@gmail.com](mailto:tcpharyana7@gmail.com)>, <[ceo.gmda@gov.in](mailto:ceo.gmda@gov.in)>, <[dcgrg@hry.nic.in](mailto:dcgrg@hry.nic.in)>, Commissioner Municipal Corporation <[cmc@mcg.gov.in](mailto:cmc@mcg.gov.in)>, <[cf.gurgaon@gmail.com](mailto:cf.gurgaon@gmail.com)>, DFO T Gurgaon <[dfogurgaon1@gmail.com](mailto:dfogurgaon1@gmail.com)>, <[dfo.gmda@gov.in](mailto:dfo.gmda@gov.in)>, Nodal Officer Environment <[noenv@mcg.gov.in](mailto:noenv@mcg.gov.in)>, <[secy-moef@nic.in](mailto:secy-moef@nic.in)>, <[hardeep.spuri@sansad.nic.in](mailto:hardeep.spuri@sansad.nic.in)>, <[judicial-ngt@gov.in](mailto:judicial-ngt@gov.in)>, <[ngt.filing@gmail.com](mailto:ngt.filing@gmail.com)>, <[registrar-ngt@nic.in](mailto:registrar-ngt@nic.in)>, <[anilvijcomplaints@gmail.com](mailto:anilvijcomplaints@gmail.com)>, <[vivek@haryali.org](mailto:vivek@haryali.org)>, Rahul Choudhary <[rahulchoudhary@gmail.com](mailto:rahulchoudhary@gmail.com)>, <[sheilzamalhotra@gmail.com](mailto:sheilzamalhotra@gmail.com)>, krishan kumar Yadav <[kkyadav07@gmail.com](mailto:kkyadav07@gmail.com)>

To

Shriman M.L Khattar  
CM  
Haryana

Sub : Regarding Protection for every single tree 🌳 growing in jurisdiction of Municipal Corporation Gurgaon + GMDA + HSVP; flawed building plans allowing end to end gates and stilt parking; necessity for a stringent TREE ACT like neighbouring Delhi; & zilch efforts from CM office

Shriman,

This is 5th reminder highlighting the above mentioned issues. Mails were sent to you on dates 12 May 2020, 13 July 2020, 13 Sep 2021, 17 Dec 2021. It's going to be 2 years now and in this period of inaction from your office Gurgaon has lost thousands of trees.

Stilt Parking, end to end gates at the facade of the plot after the building byelaws were amended have led to this mindless development. And this is the case for every Urban town and city of Haryana. Although this amendment has been an Excellent source of revenue generation for your govt but no focus has been on livability, green cover, health quotient of citizens...which is directly proportionate to the number of trees and green cover. WHO(World Health Organization) itself has recommended that cities should provide 9 sqm unpaved, undeveloped green space for every inhabitant(as also mentioned in Urban Green Guidelines 2014).

Your flawed Town & Country planning amendments have made all Urban areas of Haryana concrete jungles, heat islands & unliveable. You give sermons and speeches on Vanmahotsav for tree protection, but have blindfolded your eyes towards destruction of lakhs of trees all across Haryana.

Urban areas in Haryana have Toothless law for tree protection & this brings to forefront the glaring fact that there is a lacking Tree Act in Gurgaon, unlike neighbouring Delhi. And nor is there any will of the concerned Forest [dept.to](#) protect the trees in the city.

Vaishali Rana (9899078299)  
Vivek Kamboj (9811005511)

----- Forwarded message -----

From: **Vaishali Rana Chandra** <[vaishali2013.vrc@gmail.com](mailto:vaishali2013.vrc@gmail.com)>

Date: Mon, 13 Sep 2021, 11:08

Subject: Protection for every single tree 🌳 growing in jurisdiction of Municipal Corporation Gurgaon + GMDA; & necessity for a stringent TREE ACT like neighbouring Delhi

To: <[cmharyana@nic.in](mailto:cmharyana@nic.in)>, <[cmharyana14@gmail.com](mailto:cmharyana14@gmail.com)>, <[emharyana@gmail.com](mailto:emharyana@gmail.com)>

Cc: <[cs@hry.nic.in](mailto:cs@hry.nic.in)>, <[ulbhry@gmail.com](mailto:ulbhry@gmail.com)>, <[dulbhry@hry.nic.in](mailto:dulbhry@hry.nic.in)>, Director General <[tcpharyana3@gmail.com](mailto:tcpharyana3@gmail.com)>, <[tcpharyana7@gmail.com](mailto:tcpharyana7@gmail.com)>, <[apccfforestry@gmail.com](mailto:apccfforestry@gmail.com)>, <[dcgrg@hry.nic.in](mailto:dcgrg@hry.nic.in)>, Commissioner Municipal Corporation <[cmc@mcg.gov.in](mailto:cmc@mcg.gov.in)>,

<[ceo.gmda@gov.in](mailto:ceo.gmda@gov.in)> <[ccfprt2@gov.in](mailto:ccfprt2@gov.in)> <[dfc.gmda@gov.in](mailto:dfc.gmda@gov.in)> DEO T Gurgaon



345

Litigation . &lt;litigation@dclawchambers.com&gt;

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**Copy of Rejoinder on behalf of Applicant in OA No. 680 of 2024 Vaishali Rana & Anr. Versus State of Haryana & ors.**

1 message

**Litigation .** <litigation@dclawchambers.com>

Tue, Aug 5, 2025 at 11:48 AM

To: Bihu Sharma &lt;bihusharma@gmail.com&gt;, rkhuranalegal@gmail.com

Cc: Shreepurna Dasgupta &lt;shreepurnadasgupta@proton.me&gt;

Dear Sir,

Please find attached- Copy of Rejoinder on behalf of Applicant in OA No. 680 of 2024 Vaishali Rana & Anr. Versus State of Haryana & ors.

Thanks & Regards  
Counsel for the Applicant

**Rejoinder on behalf of Applicant.pdf**

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