



भारतीय राष्ट्रीय राजमार्ग प्राधिकरण
(सड़क परिवहन और राजमार्ग मंत्रालय, भारत सरकार)
NATIONAL HIGHWAYS AUTHORITY OF INDIA

(Ministry of Road Transport & Highways, Govt. of India)
(परियोजना कार्यान्वयन इकाई, आगरा/Project Implementation Unit, (PIU) Agra)
ऑफिस : ए-208, कमला नगर, आगरा - 282 005
Office : A-208, Kamla Nagar, Agra - 282 005
फोन/Phone : 0562 - 2580274. फैक्स/Fax : 0562 - 2580275
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23032/1/2021/आगरा बाईपास (उत्तरी)/1748

दिनांक : 22/08/2022

यू.पी.सी. - N/02008/02002/UP

सेवा में,

प्रभागीय निदेशक,
सामाजिक वानिकी वन प्रभाग,
मथुरा (उत्तर प्रदेश)

विषय: जनपद मथुरा में भारतीय राष्ट्रीय राजमार्ग प्राधिकरण परियोजना कार्यान्वयन इकाई द्वारा आगरा बाईपास (उत्तरी) एन0एच-19 (पुराना एन0एच0-2) के कि0मी0 174.500 से यमुना एक्सप्रेस-वे के कि0मी0 141.000 तक सड़क के निर्माण कार्य हेतु 1.5853 हे0 संरक्षित वनभूमि के गैरवानिकी प्रयोग एवं उस पर अवस्थित 10 वृक्षों के पातन / ट्रान्सप्लांट की अनुमति के संबंध में ।

संदर्भ: उप वन महानिरीक्षक (केन्द्रीय), भारत सरकार, पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय एकीकृत क्षेत्रीय कार्यालय, लखनऊ का पत्र सं0 8बी/यू0पी0/06/165/2022/एफ.सी./306 दिनांक 29.07.2022

महोदय,

कृपया उप वन महानिरीक्षक (केन्द्रीय), भारत सरकार, पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय एकीकृत क्षेत्रीय कार्यालय, लखनऊ के पत्र सं0 8बी/यू0पी0/06/165/2022/एफ.सी./306 दिनांक 29.07.2022 का संदर्भ ग्रहण करने का कष्ट करें, जिसके द्वारा उपरोक्त विषयक प्रस्ताव के संबंध में कतिपय सूचनाएं चाही गयी हैं । इस संबंध में आवश्यक सूचनाएं/आख्या बिन्दुवार निम्नवत् प्रेषित हैं :-

1. .kml file में आवश्यक सुधार कर दिये गये हैं । Corrected .kml file पेन ड्राइव में संलग्न है ।
2. Corrected Geo-referenced map में आवश्यक सुधार कर दिये गये हैं । Corrected Geo-referenced map संलग्न है ।
3. यह बिन्दु प्रभागीय निदेशक, सामाजिक वानिकी प्रभाग, मथुरा से संबंधित है ।
4. उपरोक्त परियोजना हेतु Irrigation department से अनापत्ति की आवश्यकता प्रतीत नहीं होती है । यदि भविष्य में आवश्यकता होगी तो भा0रा0रा0प्रा0 द्वारा Irrigation department से अनापत्ति प्राप्त कर उपलब्ध करा दी जायगी । इस संबंध में वचनबद्धता अद्योहस्ताक्षरकर्ता द्वारा हस्ताक्षरित कर 05 प्रतियों में संलग्न है ।

Janu

5. भा0रा0रा0प्रा0 द्वारा माननीय सर्वाच्च न्यायालय में टी0टी0जेड0 क्षेत्र के अंतर्गत राजकीय तथा प्राईवेट वृक्षों के पातन के संबंध में विचाराधी रिट पिटीशन (सि0) संख्या – 13381/1984 में दाखिल आई0ए0 अद्योहस्ताक्षरकर्ता द्वारा हस्ताक्षरित कर 05 प्रतियों में संलग्न है । साथ ही इस बिन्दु से संबंधित वचनबद्धता भी अद्योहस्ताक्षरकर्ता द्वारा हस्ताक्षरित कर 05 प्रतियों में संलग्न है ।

सूचनार्थ एवं अग्रेतर आवश्यक कार्यार्थ प्रेषित ।

संलग्नक : उपरोक्तानुसार

भवदीय,



(संजय वर्मा)

परियोजना निदेशक

प्रतिलिपि निम्नलिखित को सूचनार्थ एवं आवश्यक कार्यार्थ प्रेषित :-

1. वन संरक्षक, आगरा क्षेत्र, आगरा ।
2. क्षेत्रीय अधिकारी-पश्चिम-उ0प्र0, भा0रा0रा0प्रा0, लखनऊ ।



भारतीय राष्ट्रीय राजमार्ग प्राधिकरण

(सड़क परिवहन और राजमार्ग मंत्रालय, भारत सरकार)

NATIONAL HIGHWAYS AUTHORITY OF INDIA

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Full Title of Project: Construction of Agra Bypass (Northern) Connecting km.174.500 of NH-19 (old NH-2) to km 141.000 of Yamuna Expressways in the district of Mathura in the state of Uttar Pradesh on EPC mode under Bharatmala Pariyojana.

Proposal No: FP/UP/ROAD/149391/2021

Date of Proposal: 17/11/2021

Forest land proposed for Diversion: Total area 1.5853 Hectare (Area under Mathura District)

UNDERTAKING FOR SUBMISSION OF NOC FROM IRRIGATION DEPARTMENT

National Highways of Authority of India, PIU-Agra, the user agency, hereby undertakes that, NOC/Approval from the Irrigation Department, if required, will be submitted during Stage 1 compliances.

संजय वर्मा/Sanjay Verma
परियोजना कार्यान्वयन इकाई, आगरा
भारतीय राष्ट्रीय राजमार्ग प्राधिकरण/
National Highways Authority of India
परियोजना कार्यान्वयन इकाई-आगरा

Project Director

National Highways Authority of India

Project Implementation Unit,

Agra (Uttar Pradesh)



भारतीय राष्ट्रीय राजमार्ग प्राधिकरण

(सड़क परिवहन और राजमार्ग मंत्रालय, भारत सरकार)

NATIONAL HIGHWAYS AUTHORITY OF INDIA

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Proposal No: FP/UP/ROAD/149391/2021

Date of Proposal: 17/11/2021

Forest land proposed for Diversion: Total area 1.5853 Hectare (Area under Mathura District)

UNDERTAKING FOR HON'BLE SUPREME COURT PERMISSION FOR TTZ AREA

National Highways of Authority of India, PIU-Agra, the user agency, hereby undertakes that, the permission of the Hon'ble Supreme Court for the area under TTZ, will be submitted before tree falling.

संजय वर्मा/Sanjay Verma
परियोजना निदेशक/Project Director
भारतीय राष्ट्रीय राजमार्ग प्राधिकरण/
National Highways Authority of India
परियोजना कार्यान्वयन इकाई-आगरा/
Project Implementation Unit-Agra

National Highways Authority of India
Project Implementation Unit,
Agra (Uttar Pradesh)

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
I.A. No. 2022
IN
WRIT PETITION (CIVIL) NO. 13381 OF 1984

IN THE MATTER OF:

MC MEHTA

...PETITIONER

Versus

UNION OF INDIA AND OTHERS

...RESPONDENTS

IN THE MATTER OF: -

National Highways Authority of India
Through Project Director,
Project Implementation Unit, Agra
A-208, Kamla Nagar
Agra (U.P.) - 282005

...APPLICANT

Versus

1. State of Uttar Pradesh
Through Principal Secretary,
Forest Department, Government of Uttar Pradesh,
Bapu Bhawan,
Sachivalaya, Lucknow - 226001
2. The Chief Conservator of Forests
Office of the Principal Chief Conservator of
Forests (PCCF), 17, Rana Pratap Marg, Lucknow,
(U.P.) - 226001
3. Union of India,
Through Secretary,
Ministry of Environment, Forest & Climate Change,
Indira Paryavaran Bhawan
Jorbagh Road
New Delhi - 110 003

**APPLICATION ON BEHALF OF THE NATIONAL HIGHWAYS
AUTHORITY OF INDIA FOR IMPLEADMENT AS RESPONDENT**

To,

THE HON'BLE CHIEF JUSTICE OF INDIA & HIS
COMPANION JUSTICES OF THE HON'BLE
SUPREME COURT.

THE HUMBLE APPLICATION OF
THE APPLICANT ABOVE NAMED

MOST RESPECTFULLY SHOWETH

1. That the applicant is a statutory body constituted under the National Highways Authority of India Act, 1988 and has been entrusted with the responsibility of development, maintenance and management of National Highways vested in or entrusted to it by the Central Government. It is submitted that the Ministry of Road Transport and Highways is the concerned ministry who exercises administrative control over the Applicant Authority.
2. That the present application is being filed by the applicant to seek permission from this Hon'ble Court for diversion of 1.583Ha of protected forest land and cutting of 379 trees in the Taj Trapezium Zone for the development of Northern Bypass outside the Agra City connecting the NH 19 to Yamuna Expressway.
3. It is submitted that the Agra City is one of the oldest and most visited cities of our Country. Due to its historic heritage and infrastructure, the city has always been densely populated and extremely congested. Moreover, as the main National Highway, i.e., NH 19, connecting


संजय वर्मा/Sanjay Verma
परियोजना निदेशक/Project Director
भारतीय राष्ट्रीय राजमार्ग प्राधिकरण/
National Highways Authority of India
परियोजना कार्यान्वयन इकाई-आगरा
Project Implementation Unit - Agra

Delhi to Kolkata, passes through the main city, it leads to a persistent traffic jam situation in the city causing major inconvenience to the residents as well as increases the vehicular emissions in the TTZ area.

4. It is respectfully submitted that, in Agra, in 2018, the Vehicular Traffic number was over 34,991 Passenger Car Units (PCUs), and even if a sluggish growth rate of 4% per annum is considered, it is expected that the number would cross 43,000 PCUs by 2022. Keeping in view of this pertinent traffic and vehicular emissions issues, Northern and Southern bypasses were conceptualized by the NHAI to cater to the traffic passing through the city and also reduce the vehicular pollution in the TTZ zone.
5. That, in view thereof, Northern and Southern Bypasses were conceptualized to segregate the traffic passing through the city with the Local Traffic on NH-19. It is submitted that these bypasses will, not only significantly reduce the vehicular traffic, but will also reduce the vehicular emissions in the TTZ area. It is pertinent that the proposed bypasses will utilize the existing expressways, i.e., Yamuna Expressway and Agra Lucknow expressway, instead of a greenfield alignment for the purpose of these bypasses and these bypasses will connect them both to each other and also streamline the passing traffic, currently crossing through Agra. It is respectfully submitted that the NHAI has considered and technically evaluated all the alignments for this project and the proposed one is the most viable and practical one.

6. That the present application is in respect of the conceptualized project, i.e., Northern Bypass, which would connect the Chainage 174+500 of NH-19 (old NH 02) to KM 141+000 of Yamuna Expressway National Highways and have a total length of 12.674 km excluding loops and 17.728 km including loops. The estimate cost of the project is of approx. Rs. 957.61 Crores.

A map depicting the proposed alignment of the project is annexed herewith and marked as ANNEXURE A/1 [Page No.10-12]

7. For consideration of this Hon'ble Court, the following are the major highlights of the proposed Project:
- a) Better road connectivity for the traffic travelling on NH 19 towards Kanpur and Aligarh via Agra.
 - b) Improvement of road safety inside and outside the city.
 - c) Decongestion of traffic inside the Agra city.
 - d) Saving in fuel, travel time and total transportation cost of the road users.
 - e) Reduction in vehicular pollution inside and outside city due to constant flow of traffic.
 - f) That the project has a greenfield alignment which will pass through 13 villages namely Pauri, Shehzadpur Pauri, Raipura Jatt, Bhadaya, Khanjaulighat Khadar, Khanjaulighat Bangar, Akos Bangar, Kanora Banger, Sarai Salbahan, Murshidabad Bangar, Nera Bangar, Nagla Gukhrauli & Medhawali of the Mathura and Hathras Districts.

8. That, the applicant had sought “*In Principal Approval*” from the MoEFCC for the said conceptualized Bypass project. The Proposal submitted by the Applicant has been recommended by Conservator of Forest Agra to Nodal Officer, UP, Lucknow online and a copy of the same is annexed herewith and marked as **ANNEXURE A /2 [Page No.13]**
9. That, it is most respectfully and humbly submitted that when a query concerning the Northern Bypass was raised before the Forest department, it was intimated that there is a requirement of diversion of 1.5853 Ha of protected forest land and cutting and removal of 101 nos. of trees on protected forest land and 278 nos. private trees on non-forest land.
10. That the detailed list of trees to be felled for the above cited section i.e. from km 0.000 to km 12.674 in Mathura & Hathras Districts (379 Nos.) is annexed herein as **ANNEXURE A/3 [Page No.14-40]**
11. It is respectfully submitted that the applicant has technically evaluated other alternative alignments and the proposed alignment was found to be most feasible and beneficial for the Environment specifically in the TTZ zone.
12. That the applicant is fully committed towards sustainable development of the National Highways and is committed to maintain and preserve the environment. It is submitted that as per the prevailing policy, it will deposit the requisite amount with the Compensatory

Afforestation fund and has also planned to plant trees in the median of the Bypass road as per prevailing policy. Further, for the construction of the alignment, the Green Highway policy would be followed.

13. That, vide notification S.O.2559 (E) dated 22/08/2013 of Ministry of Environment, forests and Climate Change, it was intimated that the category of development of highway projects under 100 kms would not require Environmental Clearance. As the total length of the present project is just 17.728 including loops, it would not require Environmental Clearance.
14. That the project road does not pass through any protected area like wildlife sanctuary, national park, biosphere reserve etc.
15. That in the light of above details as well as the applicant's commitment to comply with all necessary laws, rules and conditions imposed by the relevant authorities, the applicant is filing the present Application before the Hon'ble court for further direction and necessary approval/ directions.
16. That the present application is bonafide and nothing material has been concealed by the Applicant.
17. That in view of the submissions hereinabove, it is respectfully prayed that the present application be allowed and the Applicant Authority be impleaded before this Hon'ble Court to participate in the proceedings.

18. That the present application is bonafide and is being filed in the interest of justice and also for the public interest. It is submitted that grave loss and injury would be caused to the Applicant Authority if the present application is not allowed.

PRAYER

It is, therefore, most respectfully prayed that this Hon'ble Court be pleased to:

- a) Allow the impleadment of the Applicant, National Highways Authority of India in the array of parties as Respondent to participate in the proceedings;
- b) Pass such other order(s) and/or direction(s) that this Hon'ble Court deems fit and proper in the facts and circumstances of this case.

AND FOR THIS ACT OF KINDNESS THE APPLICANT AS IN DUTY BOUND SHALL FOREVER PRAY.

DRAWN & FILED BY

Tavish

**M. V. KINI & ASSOCIATES
ADVOCATE FOR THE APPLICANT**

NEW DELHI

DATED: 22.06.2022

Sanjay

संजय वर्मा/Sanjay Verma
परियोजना निदेशक/Project Director
भारतीय राष्ट्रीय राजमार्ग प्राधिकरण/
National Highways Authority of India
परियोजना कार्यान्वयन इकाई-आगरा
Project Implementation Unit-Agra

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION

I.A. No. 2022

IN

WRIT PETITION (CIVIL) NO. 13381 OF 1984

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Versus

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...RESPONDENTS

IN THE MATTER OF: -

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Through Project Director,
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Agra (U.P.) – 282005

...APPLICANT

Versus

1. State of Uttar Pradesh
Through Principal Secretary,
Forest Department, Government of Uttar Pradesh,
Bapu Bhawan,
Sachivalaya, Lucknow - 226001
2. The Chief Conservator of Forests
Office of the Principal Chief Conservator of
Forests (PCCF), 17, Rana Pratap Marg, Lucknow,
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3. Union of India,
Through Secretary,
Ministry of Environment, Forest & Climate Change,
Indira Paryavaran Bhawan
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National Highways Authority of India
परियोजना कार्यान्वयन इकाई-आगरा
Project Implementation Unit-Agra

APPLICATION ON BEHALF OF THE NATIONAL HIGHWAYS AUTHORITY OF INDIA FOR DIVERSION OF 1.5853 HA PROTECTED FOREST LAND AND SEEKING PERMISSION FOR CUTTING AND REMOVAL OF 379 TREES IN TAJ TRAPEZIUM ZONE FOR SIX LANING OF AGRA BYPASS (NORTHERN) CONNECTING KM. 174.500 OF NH-19 (OLD NH-2) TO KM 141.000 OF YAMUNA EXPRESSWAYS IN THE DISTRICT OF MATHURA IN THE STATE OF UTTAR PRADESH ON EPC MODE UNDER BHARATMALA PARIYOJANA

To,

THE HON'BLE CHIEF JUSTICE OF INDIA & HIS
COMPANION JUSTICES OF THE HON'BLE
SUPREME COURT.

THE HUMBLE APPLICATION OF THE
APPLICANT ABOVENAMED

MOST RESPECTFULLY SHOWETH

1. That the applicant is a statutory body constituted under the National Highways Authority of India Act, 1988 and has been entrusted with the responsibility of development, maintenance and management of National Highways vested in or entrusted to it by the Central Government. It is submitted that the Ministry of Road Transport and Highways is the concerned ministry who exercises administrative control over the Applicant Authority.
2. That the present application is being filed by the applicant to seek permission from this Hon'ble Court for diversion of 1.583Ha of protected forest land and cutting of 379 trees in the Taj Trapezium Zone for the development of Northern Bypass outside the Agra City connecting the NH 19 to Yamuna Expressway.


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National Highways Authority of India
परियोजना कार्यान्वयन इकाई-आगरा
Project Implementation Unit-Agra

3. It is submitted that the Agra City is one of the oldest and most visited cities of our Country. Due to its historic heritage and infrastructure, the city has always been densely populated and extremely congested. Moreover, as the main National Highway, i.e., NH 19, connecting Delhi to Kolkata, passes through the main city, it leads to a persistent traffic jam situation in the city causing major inconvenience to the residents as well as increases the vehicular emissions in the TTZ area.
4. It is respectfully submitted that, in Agra, in 2018, the Vehicular Traffic number was over 34,991 Passenger Car Units (PCUs), and even if a sluggish growth rate of 4% per annum is considered, it is expected that the number would cross 43,000 PCUs by 2022. Keeping in view of this pertinent traffic and vehicular emissions issues, Northern and Southern bypasses were conceptualized by the NHAI to cater to the traffic passing through the city and also reduce the vehicular pollution in the TTZ zone.
5. That, in view thereof, Northern and Southern Bypasses were conceptualized to segregate the traffic passing through the city with the Local Traffic on NH-19. It is submitted that these bypasses will, not only significantly reduce the vehicular traffic, but will also reduce the vehicular emissions in the TTZ area. It is pertinent that the proposed bypasses will utilize the existing expressways, i.e., Yamuna Expressway and Agra Lucknow expressway, instead of a greenfield alignment for the purpose of these bypasses and these bypasses will connect them both to each other and also streamline the passing

traffic, currently crossing through Agra. It is respectfully submitted that the NHAI has considered and technically evaluated all the alignments for this project and the proposed one is the most viable and practical one.

6. That the present application is in respect of the conceptualized project, i.e., Northern Bypass, which would connect the Chainage 174+500 of NH-19 (old NH 02) to KM 141+000 of Yamuna Expressway National Highways and have a total length of 12.674 km excluding loops and 17.728 km including loops. The estimate cost of the project is of approx. Rs. 957.61 Crores.

A map depicting the proposed alignment of the project is annexed herewith and marked as **ANNEXURE A/1 [Page No.50-52]**

7. For consideration of this Hon'ble Court, the following are the major highlights of the proposed Project:
- a) Better road connectivity for the traffic travelling on NH 19 towards Kanpur and Aligarh via Agra.
 - b) Improvement of road safety inside and outside the city.
 - c) Decongestion of traffic inside the Agra city.
 - d) Saving in fuel, travel time and total transportation cost of the road users.
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- f) That the project has a greenfield alignment which will pass through 13 villages namely Pauri, Shehzadpur Pauri, Raipura Jatt, Bhadaya, Khanjaulighat Khadar, Khanjaulighat Bangar, Akos Bangar, Kanora Banger, Sarai Salbahan, Murshidabad Bangar, Nera Bangar, Nagla Gukhrauli & Medhawali of the Mathura and Hathras Districts.
8. That, the applicant had sought “*In Principal Approval*” from the MoEFCC for the said conceptualized Bypass project. The Proposal submitted by the Applicant has been recommended by Conservator of Forest Agra to Nodal Officer, UP, Lucknow online and a copy of the same is annexed herewith and marked as **ANNEXURE A /2 [Page No.53]**
9. That, it is most respectfully and humbly submitted that when a query concerning the Northern Bypass was raised before the Forest department, it was intimated that there is a requirement of diversion of 1.5853 Ha of protected forest land and cutting and removal of 101 nos. of trees on protected forest land and 278 nos. private trees on non-forest land.
10. That the detailed list of trees to be felled for the above cited section i.e from km 0.000 to km 12.674 in Mathura & Hathras Districts (379 nos.) is annexed herein as **ANNEXURE A/3 [Page 54-80]**
11. It is respectfully submitted that the applicant has technically evaluated other alternative alignments and the proposed alignment was found to

be most feasible and beneficial for the Environment specifically in the TTZ zone.

12. That the applicant is fully committed towards sustainable development of the National Highways and is committed to maintain and preserve the environment. It is submitted that as per the prevailing policy, it will deposit the requisite amount with the Compensatory Afforestation fund and has also planned to plant trees in the median of the Bypass road as per prevailing policy. Further, for the construction of the alignment, the Green Highway policy would be followed.
13. That, vide notification S.O.2559 (E) dated 22/08/2013 of Ministry of Environment, forests and Climate Change, it was intimated that the category of development of highway projects under 100 kms would not require Environmental Clearance. As the total length of the present project is just 17.728 including loops, it would not require Environmental Clearance.
14. That the project road does not pass through any protected area like wildlife sanctuary, national park, biosphere reserve etc.
15. That in the light of above details as well as the applicant's commitment to comply with all necessary laws, rules and conditions imposed by the relevant authorities, the applicant is filing the present Application before the Hon'ble court for further direction and necessary approval/ directions.


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National Highways Authority of India
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Project Implementation Unit-Agra

16. That the present application is bonafide and nothing material has been concealed by the Applicant.

PRAYER

It is therefore, most respectfully prayed that this Hon'ble Court be pleased to: -

- a) Grant permission to the Applicant for diversion of 1.5853 HA protected forest land and cutting & removal of 379 Nos. of trees and in the District of Mathura & Hathras in the TTZ area;
- b) Pass such other order(s) and/or direction(s) that this Hon'ble court deems fit and proper in the facts and circumstances of this case.

AND FOR THIS ACT OF KINDNESS THE APPLICANT AS IN DUTY BOUND SHALL FOREVER PRAY.

DRAWN & FILED BY

Tavinda

**M. V. KINI & ASSOCIATES
ADVOCATE FOR THE APPLICANT**

NEW DELHI

DATED: 22.06.2022

Sanjay

संजय वर्मा/Sanjay Verma
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