



INDIAN JOURNAL OF
LEGAL REVIEW

VOLUME 5 AND ISSUE 11 OF 2025

INSTITUTE OF LEGAL EDUCATION



INDIAN JOURNAL OF LEGAL REVIEW

APIS – 3920 – 0001 | ISSN – 2583-2344

(Open Access Journal)

Journal's Home Page – <https://ijlr.iledu.in/>

Journal's Editorial Page – <https://ijlr.iledu.in/editorial-board/>

Volume 5 and Issue 11 of 2025 (Access Full Issue on – <https://ijlr.iledu.in/volume-5-and-issue-11-of-2025/>)

Publisher

Prasanna S,

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No. 08, Arul Nagar, Seera Thoppu,

Maudhanda Kurichi, Srirangam,

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A STUDY ON ENCROACHMENT BY RELIGIOUS INSTITUTIONS ON PUBLIC LANDS

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** LL.B., VISTAS ALUMNI (3 YEARS LL.B., B-SECTION 2022-2025)

BEST CITATION – GOWRI SHANKARI. R & VIJAYARAGHAVAN. K, A STUDY ON ENCROACHMENT BY RELIGIOUS INSTITUTIONS ON PUBLIC LANDS, *INDIAN JOURNAL OF LEGAL REVIEW (IJLR)*, 5 (11) OF 2025, PG. 448-456, APIS – 3920 – 0001 & ISSN – 2583-2344

ABSTRACT

The article aims in highlighting the judicial commitment towards preserving the goals of government to curb unauthorized occupation of government lands from all modes of encroachment including encroachment by religious institutions. The civic, municipal and rural administration should attempt at the grass root level to protect and prevent the government lands from encroachments. The public administration holds the responsibilities to identify the encroachment at the initial stage with the coordination of respective Revenue and Disaster Management Department for necessary actions taken jointly under due procedures. While in the present scenario were encroachment had not been prevented in the budding stage by the civic administration, the task of evicting the encroachers or to safeguard the government lands from the encroachers occupies a lengthy litigation process. The lethargic attitude of enforcement officials to curb the encroachment result in loss to the exchequer money, and subsequent attempt in removing the encroachment leads to humiliate the sentiments of religious feeling. Tamil Nadu government released statistics stating that over 3,000 places of worship were built on public places, with reference to high court order of Madras. Failure in upholding rule of law by the administration entrusted by the respective State government, forces the judiciary to reinstating the justice through its decisions against encroachment. The verdict delivered by the court incorporates judicial caution to avoid any unintended overreach in their judgment when acting on encroachment. This attitude of courts indicates promotion of social justice and welfare in accordance with the government policies. The Supreme Court plays a pivotal role in eradicating encroachment by religious institution and through any other forms in the country.

Key words:

Encroachment; public places; temple; mosque; church; gurudwar; shrine

1. INTRODUCTION

Land encroachment pertains to a process when someone infringes on the property rights of a landowner by unlawfully entering a building or property, or accidentally or purposely extending a portion of the building into another person's structure. Pavements are the most frequent location for this type of religious intrusion on public property. For instance, it is seen that on peepal tress, people often tie sacred threads

and that place is used as a temple, sacred worship place, etc. Encroachment that were orchestrated using religion as a cover refer to the encroachment of land committed in the name of a particular religion, such as conversion of public property and turning it into a house of worship, a shrine, or performing religious activities or historical sites into houses of worship or the appropriation of land adjacent to such sites.

The controversial social issue arises due to encroachment by religious institutions, were State being a custodian towards protection and enjoyment of public and private lands. Constitution of India does not restrict its citizens from following a religion of his choice, the State were entrusted to shoulder the responsibility in protecting public resources and spaces from being monopolizing due to unscrupulous religious activity. If encroachment by religious institution were unnoticed, such act will raise suspicious upon the State commitment in upholding the constitutional rights of its citizens. Which in turn sow the seeds leading to conflict and unrest among various religious groups. The bench comprising S.M. Subramaniam, J.⁶⁹⁶ of Madras High Court held that ***“Rule of land will be enforced on all kinds of encroachment without exception even if such act were committed by deity”***. The article aims to put forth the judicial commitment towards preserving the goals of Government of India to curb unauthorized occupation of government lands from all modes of encroachment including encroachment by religious institutions.

2. Understanding Encroachment:

The court judgments generally uphold the owner's right to their property and often order the removal of the encroachment. However, such judgments are subject to circumstances, were the encroachment is on private or government land, and whether adverse possession is a claim. A sealing of 12 years possession is essential without the owner's objection, to claim adverse possession. The encroachment unfolds in various forms, which could either arise out of land or property due to unlawful possession or use of others land for monetary gain or harassment.

3. Key ingredients of Judicial Orders:

The court takes utmost caution before rendering its verdict when it comes to its notice on unauthorized constructions on public land,

including roads, streets, and water bodies. The court shows no reluctant in removing illegal structure keeping in mind the public safety without any discrimination based on religion and directing the authorities to monitor and report on encroachments, particularly along rivers, and to take immediate action in removing the same when encroachments are found. During such eviction process the court gives the respondent a reasonable time to move on his own failure which the district administrative authorities are empowered to carry out eviction.

4. Judicial commitment to curb encroachment

Once illegal constructions are raised on a government land it becomes a question of litigious issues. In one such instance the high court of Kerala, Justice P.V.Kunhikrishnan⁶⁹⁷ retaliated that irrespective religion, encroached construction on public land deserves no protection under law. It further added that government institutions of all kind shall maintain religious neutrality.

The Constitution of India underlines neutrality and prohibits any favoritism for particular religion. The State abides to the constitution, in case of deviation the judiciary strikes to rectify the error that has been traced out. This concept had been adopted by the judiciary during the scrutiny of encroachment for religious activities on government lands in order to prevent illegitimate use of property entrusted upon government. In 2006 the High Court at Gujarat underlined the need to erase illegal construction put-out by religious institutions on public spaces, thus confirming its commitment towards secularism. When an appeal was raised at Supreme Court, the Honourable Court held that no religious or unauthorised structures are permitted in public land, and also called upon for the status report in order to take a stock on encroachment. The judiciary scrutiny does not suffocate the religious freedom; instead it cherishes the freedom religious

⁶⁹⁶ BarandBench.com News dated 04 Jan 2019

⁶⁹⁷ Thehindu.com 30 May 2024

institution by guaranteeing its legitimate right while practicing in accordance to rule of law.

5. Judicial pronouncement

Construction of temple situated in T.S.Nos 75B, 79B Ward No. 5, Block No 1 at Kumbakonam Municipality measuring to an extent of approximately 15x20 square feet, could not have been constructed in the said property, which is owned by the municipality, which has been developed under public private partnership agreement in S.Selvaraj versus The Commissioner of Municipal Administration.⁶⁹⁸

In the Suo Moto Proceedings against Jammu and Kashmir State⁶⁹⁹ the Honorable Supreme Court held that the guidelines should explicitly indicate the time span within which the encroacher are removed or transferred to new location or accommodated due to the regularisation of unauthorized construction. The court also made the observation to file a report within 6 months by the States and Union Territories to classify unauthorized construction existing on streets, parks and grounds. The Chief Secretary of Uttarakhand was also directed to file an affidavit.

In the case Union of India Versus The State of Gujarat⁷⁰⁰ special leave petition was filed before the Supreme Court contending to implement the directions in removing unlawful religious structures propping on encroached public land.

The covert act of encroachment done by scruples persons involves in erecting pucca structures and later assert as religious places. In this case the Managing Director being the petitioner representing public sector plantation organization of Kerala. The organization was holding land through lease from Kodumon, Kalady and Perambra. In the estate of Chandanpally at division "C" there was numerous attempts to institute temple, and same was opposed which led to unrest and to

restore peace through intervention of revenue officer and police. As now respite towards encroachment and intimidation was in sight against plantation, hence the move towards judicial scrutiny and protection was sought.⁷⁰¹

In the case of Balakrishna Pillai,⁷⁰² the Court was of the opinion that when the government opts in implementing development activities for betterment of living conditions the resistance against such projects should be denounced. The crux of the present case is the land acquisition for National Highway as it would lead to erase mosque and temple on the planned configuration if project commences. The court made it clear that its interference would arise only if deceptive or patent illegality observed. Mere presence of a curve or Mosque or Temple or School could not be held as a ground for invoking constitutional rights.

The petition filed praying to forthwith demolish the illegal shrine at the foot of the hillock, dismantle the cross atop the hillock erase all religious marks on the rocks of the hillock. Meanwhile the State has removed the structure, hence the petition was closed Gajendra Singh Versus The State of Karnataka.⁷⁰³

The Delhi Municipal Corporation carried out the demolition of illegal portion of the Mangolpuri mosque site in accordance to court order.⁷⁰⁴ The case pertains to installation of prayer space for religious institution at Malappuram, instituted by Islamic association.⁷⁰⁵ The court made the remarks that in Kerala we have numerous religious worship places for all religion to cater their religious belief. Hence the question for new site for religious purpose doesn't arise. The Kerala High Court emphasized the State to curtail the unauthorized structures and encroachments.

⁶⁹⁸ S.Selvaraj versus The Commissioner of Municipal Administration W.P. (MD) 23441/2019

⁶⁹⁹ Re Suo Moto Proceedings Versus State of Jammu and Kashmir and others W.P. (C) PIL No. 01/2019

⁷⁰⁰ Union of India Versus The State of Gujarat Miscell. Appl. No. 2166 of 2018 in SLP (C) No. 8519/2006

⁷⁰¹ The Plantation Corporation of Kerala Limited versus The State of Kerala W.P. (C) NO. 34919 / 2016

⁷⁰² Balakrishna Pillai and Others v. Union of India and Others 2021 (4) KHC 282

⁷⁰³ Gajendra Singh Versus The State of Karnataka W.P. No. 6333 / 2020 (GM-RES-PIL)

⁷⁰⁴ Save India Foundation Regd. Versus Govt.of NCT of Delhi & Ors W.P. (C) 4867/2024.

⁷⁰⁵ Noorul Islam Samskarika Sangam Thottakkad, Malappuram Versus District Collector Malappuram and others 2022 (5) KHC 595

Pooja Gurnani Versus State Of Rajasthan,⁷⁰⁶ High Court of Rajasthan Bench at Jaipur. The PIL suit was filed in response to circular floated by ADGP of Jaipur for prohibiting religious practice in public areas, in accordance to was placing Rajasthan Religious Building and Places Act 1954. The prayer before the court is that to interpret and define public places so as to include all form of government institutions and government land. The court refused to grant relief and dismissed the petition.

In the M.C.Mehta case against unauthorized religious structures erected by Kali Mata Mandir prayed for free traffic flow. The court held that the structures caused undue hardship for road traffic and hence to be removed.⁷⁰⁷ The PWD and Religious Committee decision was challenged by the priest against the demolition notice of 55 years old Kali Mata Mandir located at Delhi. The trial revealed that temple was constructed on public land without due approval from public administration in Durga P Mishra versus Govt. of NCT of Delhi.⁷⁰⁸ This case pertains to the removal of Lord Shiva temple located on the beds of Yamuna river. The court was pragmatic to order the shifting of temple as unauthorized structures could not be allowed on river banks.⁷⁰⁹ The Honourable Court held that with regards to unauthorized religious place, if proper representation is placed before appropriate administration it would suggest extension time for removing or proper relocation as per master plan, as illegal structure are not permitted.⁷¹⁰

A petition was filed to remove unauthorized and illegal construction in the form of mosque at Koyambedu, Chennai 600107 measuring 1224 square feet. The said disputed construction land title was held in the of name CMDA, the same was affirmed by a civil suit at Supreme Court in

SLP (C) No.9740/2010. Hence the court passed the orders for the removal of structure after giving sufficient time for relocation of mosque on account of encroachment.⁷¹¹ In Subair C.K. Versus State of Kerala,⁷¹² the court confirmed presence of mosque on encroached land and this lead to the removal of mosque from encroached site.

Writ of Certiorarified Mandamus was filed seeking for records and quashing eviction of shops and temple in the premises of Vilayattu Vinayagar Temple located at Ranganathan Street, Railways Border Road, T. Nagar, Chennai.⁷¹³ The extract from Town Survey Land register shows existence of temple and shop on the road by encroachment. The court directed the temple authorities to relocate the deities and also for the eviction of shop situated in the encroached land.⁷¹⁴

The high court at Madras issued direction for the demolition of the Temple situated on encroached land. The petitioner prayed for extension in time for shifting the deity and the temple would be vacated. The court directed the respondents herein not to take any adverse steps against the petitioner/Temple for a period of eight weeks from today, within which the Deity/idol shall be shifted from the present location to another location. It is also made clear that the petitioner shall not seek any further extension of time for the shifting of the Deity/idol. With the aforesaid observations and directions, the Special Leave Petitions stand disposed in Arulmighu Vilayattu Vinayagar Temple Versus The Commissioner.⁷¹⁵ In the case Popatlal Lalchand Navlakha Versus The State of Maharashtra W.P. No. 4109 / 2015 Bom,⁷¹⁶ regarding removing the illegal religious structure or to relocate the same. The court

⁷⁰⁶ Pooja Gurnani Versus State of Rajasthan D.B. W.P. (C) No. 12745/2021

⁷⁰⁷ M.C. Mehta Vs UOI & Others W.P. (C) No. 13029/1985 (IA No. 34/1999)

⁷⁰⁸ Durga P Mishra versus Govt.of NCT of Delhi W.P.(C) 6137/2023 and CM APPL. 24178/2023

⁷⁰⁹ Pracheen Shiv Mandir Avam Akhada Samiti vs Delhi Development & Ors. 2024 W.P.(C) 12817/2023 and CM APPL. 50476/2023 (Stay)

⁷¹⁰ Shri Vyankatesh Mandir Samiti Versus State of Maharashtra W.P. No. 6177/2006 (2018)

⁷¹¹ N.Dinakaran Versus The Commissioner Chennai Corporation, and others W.P.No.12224 of 2021 and W.M.P.Nos. 12991 & 12992 of 2021.

⁷¹² Subair C.K. Versus State of Kerala W.P. (C) No. 2484 / 2017.

⁷¹³ Arulmighu Vilayattu Vinayagar Temple Versus The Commissioner W.P. No. 20593 & 23496 /2018.

⁷¹⁴ A.Lakshmanan Versus The Commissioner, Greater Chennai W.P. Nos. 20593 & 23496 of 2018; W.P. No. 20593 of 2018.

⁷¹⁵ Arulmighu Vilayattu Vinayagar Temple Versus The Commissioner SL to Appeal (C) Nos. 28467-28468/2023

⁷¹⁶ Popatlal Lalchand Navlakha Versus The State of Maharashtra WP No. 4109 / 2015 Bom.

directed removal of illegal structure within a period of two months.

Khatsa No. 110 having an area of 0.2770 hectare of which it consisted of government school construction in one part and in other part mosque type structure construction for religious activities. No religious body, sect or dera has any authority or right to raise construction on the government land or panchayat land. The structure or mosque raised on the part of Khasra no.110 is ordered to be demolished within a period of 48 hours from today. The court held that the Superintendent of Police Haridwar shall render all necessary assistance to revenue agencies to demolish the structure in Amrish Kumar Tyagi versus State of Uttarakhand.⁷¹⁷

A suit was filed by the resident alleging unauthorized temple construction encroaching street of Otteri, Chennai. Admitting the plea the court ordered the Chennai Corporation to file a status report. The existence of illegally construction were confirmed, the directed the corporation to take necessary steps to remove encroachment. The court felt it is appropriate to impleaded "State" as one of the party for consideration of issues appropriately, and suitable direction were issued.⁷¹⁸

The petitioner Dr. Brijesh Kumar Rai and Vikrant Singh preferred PIL on being aggrieved by the illegal construction of a temple inside the IITG campus, which was done without any due authority and thereby depriving the resident and non-resident staffs and students of IITG from their fundamental right to live, work and study in a secular environment Brijesh Kumar Rai Versus Union Of India Through Secretary.⁷¹⁹

National Highway Authority inclined to construct a bye-pass for aligning the existing highway at both the ends of the Vatanappally town. The appellants in W.A. No.392/2010, has highlighted the existence of structure for snake gods, the records make it clear that the land treated as

abode of the snake gods was abandoned for long and the matter is taken up by the appellants now only to block the construction of the proposed bypass road. The court held that there exist no legitimate right to move up this objection by the appellants.⁷²⁰

In Rinku Singh Kushwah Versus The State of Madhya Pradesh,⁷²¹ the State were directed to file reply and also to inform as to whether guidelines were adhered inline to suit in Union of India Versus State of Gujarat & Others in SLP (Civil) No. 8519/06, decided on 18/1/2013 inter alia pertaining to installation of statues on public roads or public utility places are being followed or not.

The villagers alleging that the lands on which the proposed respondent had applied for mining lease are the lands covered by as many as three temples and also allegedly that the said temples were demolished by the proposed respondent with a view to facilitate the mining lease proposed. The said unauthorized demolition of temple, has been reflected in the report of the Tahsildar, Satyaveedu Mandal, wherein it is stated that three temples were constructed in August 2010 in the lands in S.Nos.23/9, 26/11 and 28/12 of P.V. Puram village, Satyaveedu Mandal and only at the time of opening ceremony poojas were performed but thereafter no poojas were performed and the temples were closed. The villagers never visited these temples and they are constructed in vacant land situated at a distance of 1 KM and as such not accessible to the villagers. These temples were destroyed in the month of September 2011 by some miscreants and the confidential report revealed that the temples were constructed by some of the villagers of Chamarthikandrige with an ulterior motive to see that the mining lease application of the proposed respondent is not considered on that ground in the case of Mallikarjuna Reddy Versu

⁷¹⁷ Amrish Kumar Tyagi versus State of Uttarakhand and others W.P. No.33 (PIL) 2016.

⁷¹⁸ K.Ramakrishnan v. District Collector, 2019 SCOnline Mad 36.

⁷¹⁹ Brijesh Kumar Rai Versus Union Of India Through Secretary W.P. (C) 8796/2020 HC-Delhi.

⁷²⁰ Gopi Versus National Highway Authority of India W.P. (C) 4838/2010 (Ker).

⁷²¹ Rinku Singh Kushwah Versus The State of Madhya Pradesh on 2 January 2017 W.P. 8904/2016.

The Tahsildar Satyaveedu Mandal, Chittoor District.⁷²²

The respondents have admitted 1127 encroachments, were the unscrupulous persons have encroached upon marg and also constructed the shops over Saraswati Drain to the extent of about 57 meters. The Nagar Palika Parishad, Rishikesh has granted permission to the Sai Sewa Samiti on 28.05.2009, to raise the construction and later withdrawn. The Haridwar Development Authority has ordered for demolition of temple on 08.07.2009 against which Sai Sewa Samiti filed an appeal before the Commissioner which was dismissed on 18.02.2010. The petitioner also placed on record, whereby 13 temples have encroached upon the public land. The illegal encroachment has led to the pollution in Saraswati Nala. Moreover the Nagar Palika Parishad had 13 illegal building constructed without approval from Haridwar Development Authority. The respondent was directed to seal the religious places, if constructed on public land/pavement without any authority of law, and to proceed for demolition after providing relocation opportunity period in the case of Anil Kumar Gupta Versus State of Uttarakhand.⁷²³

The State Government has constituted committees at State, District and Municipal to review the unauthorised religious structures and carryout assessment in a short span of time. In the instant case Panvel Municipal Corporation committee has been appointed to review religious structures falling in the jurisdiction of the Respondent Corporation. Till the decision of said committee comes, both the parties shall maintain status quo as of today in Om Shiv Shankar Seva Mandal Versus State of Maharashtra.⁷²⁴

The contempt petition filed by petitioner in Sameer Kumar Sharma Versus Madhya

Pradesh⁷²⁵ alleges noncompliance of the final order dated 07.01.2016 passed in Conc. No. 742/2015 where following directions had been passed :- Dr. Sanjay Goyal Collector, District Gwalior was empowered to examine the matter again with respect to temple and majar (dargah) in the light of all the relevant papers afresh including the stake of civil suit and if there is no any interim order from the civil Court, then consider and decide the matter afresh keeping in view the concerning provisions, rules regulations, notifications, circulars and the scheme promulgated in this regard, if any, and take the appropriate endeavour to avoid the unhappy incident or the situation which may create the law and order situation in that locality. We have also been apprised by the counsel for the interveners Shri H.K. Shukla that aforesaid Majar (Dargah) as well as the Temple are not creating any traffic hazard because the same are in some open area of alleged park/garden. In view of such statement the Collector, District Gwalior is directed to consider such aspect also. It is expected from the Collector, District Gwalior that he will consider the matter as early as possible probably within three months from today after extending the opportunity of hearing to the parties herein and of the aforesaid writ petition so also the concerning citizens and the residents of locality of that area. The Collector shall have the discretion to stay further proceedings of the aforesaid matter till passing the appropriate order by the Civil Court or by any superior Court in the matter. However, the Collector of Gwalior District will not permit to any agency or to any person to disturb the existing nature of the alleged Temple and Majar (Dargah) as exists today initially for three months till the enquiry is completed or till passing of any interim order by the Civil Court or any other competent Court whichever is earlier.

From a bare scrutiny of the order, it appears that while disposing of the contempt petition which had arisen out of order dated 02.07.2015

⁷²² Mallikarjuna Reddy Versu The Tahsildar Satyaveedu Mandal, Chittoor District W.P. Nos.12814 and 29086 of 2011 Andhra Pradesh at Hyderabad.

⁷²³ Anil Kumar Gupta Versus State of Uttarakhand W.P. (PII) No.26 of 2010 decided on: 24.08.2018 Uttarakhand at Nainital.

⁷²⁴ Om Shiv Shankar Seva Mandal Versus State of Maharashtra W.P. No. 12459 / 2017 (Bom).

⁷²⁵ Sameer Kumar Sharma Versus Madhya Pradesh Conc. 433/2017 (Thr on 29 January, 2018)

passed in W.P. No. 19/2015 (PIL) the court did not pass any specific direction to any particular authority. Instead, the coordinate Bench of this Court while passing order dated 07.01.2016 in Conc. No. 742/2015 while deciding the said case expressed expectation from the Collector to decide the matter early and extended liberty to the said authority to take action in a particular manner in a given contingency. We are conscious of the fact that petitioner, who appears in person, had raised a cause which prima facie appears to be genuine. The petitioner apprised that unlawful religious construction are continuing to stand on public / Government land leading to patent violation against the direction of court in Union of India Versus State of Gujrat & Ors S.L.P (Civil) No. 8519/2006. Hence the contempt prayer filed due to non compliance of earlier order passed by this Court on 12.04.2022 directing to remove unauthorized religious construction at public space.⁷²⁶

The petitioner prayed for the removal of unauthorized structures erected by Sri Guru Nanak Darbar and Radha Madhav Mandir, as it hindered free flow of traffic. The court directed the removal of holy idols and other belongings in a period of 6 weeks, thereafter construction removal.⁷²⁷

With reference to the order of Supreme Court in Union of India against State of Gujarat,^{728, 729} the Additional Solicitor General of India appearing for the Union contended that the a final direction may be issued by the Honourable Supreme Court after hearing the respondents. The AGS took measures to convey meeting between Central and States in order to reach a consensus before proposing a uniform approach to tackle encroachment. Subsequently States and Union Territories were directed by the court to file a comprehensive affidavit indicating the encroachment at public

lands (Table 1), and also to state the remedial steps taken or formulated in getting rid of encroachment.

CONCLUSIONS

The most social sensitive issue is when encroachment gets a shade of religious institution. The commitment of judiciary is well established through its verdict pronounced in its journey to curb encroachment in all forms. The clandestine and wicked taught of few raise religious disharmony due to their acts. The encroachment beings in a simple way of tying cloth or inscription of symbol on mile stone or tree and later on developed into worship place surrounded by commercial establishment, this art works on well developed taught process to grab both public and private lands. The government administration should take stern action at the nip to remove such encroachment else trouble mongers will create fiction among various religious people when attempted to remove at later stage.

Table 1. Unauthorized religious construction in India

State / Union Territory*	Unauthorised religious structures in public places
State of Gujarat	15,000
State of Madhya Pradesh	51,624
State of Karnataka	2814
State of Jammu & Kashmir	1502
State of Himachal Pradesh	4,000
State of Jharkhand	1142.
State of Orissa	15,708
Union Territory of Chandigarh	285

⁷²⁶ Ramnarayan Versus Mukesh Gupta Cont No 789/ 2022 HC Chhattisgarh.

⁷²⁷ Gurmej Singh Versus State of Punjab W.P. (C) 25680/2024 (O/M) PHHC 049487

⁷²⁸ Union of India v. State of Gujarat, (2011) 14 SCC 62

⁷²⁹ Union of India v. State of Gujarat, (2011) 14 SCC 60 (SL Appeal (Civil) No 8519 / 2006.

State of Tripura	85
State of Meghalaya	17
Union Territory of Puducherry	515
State of Kerala	901
State of Punjab	837
State of Bihar	16,834
State of Uttarakhand	3,647
State of Rajasthan:	58,253
State of Manipur	188
State of Goa	977
National Capital Territory of Delhi	20
State of Maharashtra:	17,385
State of Tamil Nadu	77,453
State of Andhra Pradesh	6707
Nagaland, Sikkim, Mizoram and Lakshadweep	No encroachment
Andaman and Nicobar Islands:	285
Daman & Diu and Dadar & Nagar Haveli	87 28

- S.Selvaraj versus The Commissioner of Municipal Administration W.P. (MD) 23441/2019.
- Re Suo Moto Proceedings versus State of J&K and others W.P. (C) PIL No. 01/2019.
- Union of India Versus The State of Gujarat Miscell. Appl. No. 2166 of 2018 in SLP (C) No. 8519/2006.
- The Plantation Corporation of Kerala Limited versus The State of Kerala W.P. (C) NO. 34919 / 2016.
- Balakrishna Pillai and Others v. Union of India and Others 2021 (4) KHC 282.
- Gajendra Singh Versus The State of Karnataka W.P. No. 6333 OF 2020 (GM-RES-PIL).
- Save India Foundation Regd. Versus Govt.of NCT of Delhi & Ors W.P. (C) 4867/2024
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- N.Dinakaran Versus The Commissioner Chennai Corporation, W.P.No.12224, 12991 and 12992 of 2021.

***Note:**

Affidavit Data not available for the mentioned

States: State of Assam; State of Uttar Pradesh; State of West Bengal; State of Chhattisgarh; State of Haryana; State of Arunachal Pradesh; State of Himachal Pradesh

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29. Om Shiv Shankar Seva Mandal Versus State of Maharashtra W.P. No. 12459 / 2017 (Bom).
30. Sameer Kumar Sharma Versus Madhya Pradesh Conc. 433/2017 (Thr on 29 January, 2018).
31. Ramnarayan Versus Mukesh Gupta Cont No 789/ 2022 HC-Chhattisgarh.
32. Gurmej Singh Versus State of Punjab W.P. (C) 25680/2024 (O/M) PHHC 049487
33. Union of India Versus State of Gujarat, (2011) 14 SCC 62.
34. Union of India Versus State of Gujarat, (2011) 14 SCC 60 SL Appeal (Civil) No. 8519/2006.