



No city for Khori Gaon residents: Forced eviction during a pandemic in the name of forest conservation

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Abstract

In the last decade, conservation-led displacements have intensified in India's peri-urban areas, especially in the Delhi NCR (National Capital Region). While global academic discourses on urban informality and poverty have transcended the hegemonic ways of thinking about informal settlements as a lack of development, within the legal and public domains in India, the debates that informal settlement residents are 'free-loaders,' 'encroachers' and 'land-grabbers' are still dominant. Courts and most state governments have blamed the urban poor for environmental degradation while forests are regularly being handed over for mining, infrastructure projects and real estate developments. This article explores a recent case of conservation-led displacement in India. Khori Gaon, a 50-year-old settlement of more than 100,000 residents, was demolished following a Supreme Court order declaring they were forest encroachers during the pandemic. I argue that the settlement's forced eviction follows a distinct pattern within displacement mechanisms driven by a revanchist ideology and advanced through a process of criminalization and dehumanization of the urban poor, leading to a degradation of human rights.

Keywords

Bourgeois environmentalism, revanchist urbanism, conservation-led displacement, forced eviction, informal settlements

Introduction

Forced evictions in the name of forest conservation or development projects in India are not new. However, the legitimization of unhousing during the pandemic marks a disturbing epoch. Staying at home was one of the primary mitigation strategies exercised

through lockdowns and curfews globally during COVID-19. Additionally, United Nations guidelines recommended moratoriums on evictions and measures for negotiating rent and mortgage payments to avert a housing and health disaster. Yet, evictions have continued in multiple countries (Abu Obaid & Kremer, 2021; Beltran, 2020; Syed, 2021). In India, between March 2020 and July 2021, 21 people were evicted every hour (HLRN, 2021). From these, 52 per cent of the forced evictions were under the guise of environmental protection and disaster management.

In the last decade, conservation-led displacements have intensified in the peri-urban areas due to rampant urbanization as the peripheries of forests, rivers, coastal landscapes, and cities collide. The numbers will only rise as civil society puts more pressure on state governments to take remedial measures to combat the environmental emergency and diminishing forest cover. While global academic discourses on urban informality and poverty have transcended the hegemonic ways of thinking about informal settlements as a lack of development, within the legal and public domains in India, the debates that informal settlement residents are “free-loaders”, “encroachers” and “land-grabbers” are still dominant. Courts and most state governments have blamed the urban poor for environmental degradation while forests are regularly being handed over for mining, infrastructure projects and real estate developments. 2021 set a new record in the financialization of forests in India (Gokhale, 2021). Consequently, there has been a severe deterioration of human rights leading to violent displacements without a participatory relocation process or adequate compensation.

This article explores a recent case of conservation-led displacement in India. Khori Gaon, a 50-year-old settlement of more than 100,000 residents, was demolished between 14 July and 17 August 2021, following a Supreme Court order declaring they were forest encroachers. Contrary to this encroachment framing, the settlement had developed on a post-quarry landscape, previously shaped by four decades of mining, and the forest law used to criminalize the urban poor is actually a colonial law from 1900. But these vital facts were conveniently ignored and instead were twisted to blame the urban poor as forest encroachers. Additionally, the demolition of Khori Gaon was one of the country’s most violent demolition processes in the last few decades.

Khori Gaon’s forced eviction has severe implications for the future of informal settlements in India. The blatant human rights violation and the socio-legal processes used to justify the displacement of the urban poor for ‘environmental improvement’ during a pandemic have set a dangerous precedent. It has also risked the hard-won progress made by activists, lawyers and scholars in pushing for social justice in policies and legal statutes safeguarding the rights of the urban poor. Soon after the settlement was flattened, multiple informal settlements were given eviction notices on the pretext of conservation and partially demolished in the preceding months. The violation of human rights during Khori Gaon’s eviction began to repeat in multiple settlements across the Delhi NCR (National Capital Region) area thereafter. In the current context, bulldozers have become a weapon of social and ethnic cleansing in India (Baksh, 2022; Sud, 2022).

By situating the forced eviction within the complex historical context of the forest, I show how the current legal discourse around informal settlements and bourgeois environmentalism is driving the displacement of the urban poor in India. This article is based on my Ph.D. research from February 2017 and active participation in activism, community engagement, and the legal process in Khori Gaon's struggle since June 2021. I have collaborated in community mobilization processes and strategized the legal battle with residents, activists, academics and lawyers. The analysis is based on more than 60 semi-structured and 30 in-depth unstructured interviews, around 180 hours of group discussions, photography, observation, and discourse analysis of 18 court sessions, 38 court documents and over 70 media articles and videos.

The first section discusses the scholarship on the concepts of bourgeois environmentalism and revanchist urbanism. Next, I provide a history of the settlement to contextualize the arguments. In Section 3, I focus on court orders and their impacts. Section 4 discusses how the forest conservation claim is misplaced, and the colonial law was appropriated to target the informal settlement residents. Next, Section 5 analyses the happenings during the eviction, public responses, and the language used in the courtroom and media. In the concluding section, I argue that Khori Gaon's forced eviction follows a distinct pattern within displacement mechanisms driven by a revanchist ideology and advanced through a process of criminalization and dehumanization of the urban poor, which leads to a degradation of human rights.

1. Bourgeois environmentalism and revanchist urbanism

The conflict between conservation and social justice ideals has a long history and continues to the present. Conservationists have long claimed a higher ethical position by arguing that their discourse is motivated by climate concerns, preserving biodiversity, and advocating for sustainable practices (Brockington & Igoe, 2006). The traditional conservation arguments are based on privileging nature over humans (Siurua, 2006). This hegemonic form of conservation asserts that human settlements destroy the pristine ecology. It justifies prioritizing natural ecology over human needs, even if this leads to starvation since it views the human settlement as antithetical to nature (Rolston, 1996). This form of conservation follows the colonial model leading to displacement and dispossession of the indigenous communities, often by criminalizing their livelihoods and labelling them as 'encroachers,' 'poachers,' and 'squatters' (Murphy, 2009).

However, this ideology has received sharp criticism over the years, with increased accusations in the last two decades (A. Agarwal & Redford, 2009). Sociologists have consistently argued that conservation-led evictions exacerbate present inequalities, resulting in increased poverty, livelihood loss, unequal citizenship, and most evictees have not been compensated (Doshi, 2018; Kabra, 2019; Schmidt-Soltau, 2003). Even among environmentalists, there is a contestation about the relationship between conservation and human rights. Many have opposed displacements on humanitarian and ethical grounds as they marginalize the less powerful and poor (Brockington et al., 2006; Sanderson, 2005).

Despite this debate, there has been no notable policy formulation or attempts to address the problem through social justice and a rights-based lens within conservation organizations (A. Agarwal & Redford, 2009). Scholars have argued that the conservation community's lack of political will has much to do with their disagreements over the human/nature relationship, and the ideology that conservation principles should guide social concerns holds the community back from making any commitment (Chapin, 2004).

The binary thinking of 'nature vs. human' has declined among the conservationists; however, the idea of depicting poor/indigenous communities in opposition to forest has been co-opted by another group—bourgeois environmentalists. While the scholarship on green gentrification and conservation-led displacements aid in analyzing unequal citizenship and environmental politics, it falls short when discussing the class struggle and the hatred with which the marginalized population is treated. Hence, to understand the relationship between violence, aspirations and power that drives these conservation-led displacements, I draw on the theoretical concepts of bourgeois environmentalism from Baviskar's (2003; 2012; 2018; 2019; 2020) work in Indian cities and revanchist urbanism from Smith's (1996) analysis of New York City.

Baviskar identifies bourgeois environmentalists as those who advocate for removing the urban poor in the name of 'public interest' (2018). This form of environmentalism prioritizes the self-interest of the privileged class by defining conservation through a world-class city narrative within a narrow imagination of protected parks and sanctuaries. This group, primarily consisting of the educated, middle-class and elite, is often more concerned with aesthetics than ecological sustainability—without reflecting on their affluent lifestyles. Hence this group often ignores the environmental aspects it advocates for. They are primarily driven by a consumerist lifestyle, where the group majorly responsible for the ecological degradation decides who gets to access the forest and what form environmental conservation should take.

A similar theory is put forward by scholars from the field of environmental justice through the concept of environmental privilege. Argüelles (2021) describes it as a form of privilege that maps onto race and class inequalities, adding the white population to the privileged group, among the others identified by Baviskar. There are multiple socio-psychological mechanisms through which environmental privilege is naturalized, including: creating a perception of 'green living' through biking, using electric vehicles, avoiding plastic bottles, buying local food, etc.; through ideas of entitlement; and through claims of victimhood.

Both Baviskar and Argüelles highlight that privileged environmentalism is enabled through socio-political structures and urban imaginaries. As the group is concerned with controlling the city's image and public spaces, they create an urban order by unseeing the complex interdependencies in the city (Baviskar, 2020). Baviskar writes that the group voices their demands through privileged access to media, citizen campaigns and court cases. They have weaponized Public Interest litigation (PIL) against the poor by pushing the courts to give orders for 'slum clearances.' Often, '[b]ourgeois desires for an ordered environment are [also] reflected' in the arguments put forth by the judiciary in justifying the displacements

(Baviskar, 2020, p. 404). Studying Delhi's legal cases, Ghertner (2010) highlights that the case for demolishing a development is based on its aesthetic rather than on whether it complies with environmental regulations. If a built form ascribes to the world-class city vision, they are often declared as planned or given permission. In contrast, informal settlements are seen as a nuisance and relegated as illegal and unplanned. As the court orders bypass all negotiation processes between political parties and informal settlement dwellers, they politically disempower the marginalized communities (Baviskar, 2012).

Revanchism is another concept that provides a framework to theorize displacements and specifically to think about the violence and coercion during these processes. Its origin is in the French word *revanche*, which means revenge. Smith's (1996) conceptualisation of a 'revanchist city' stems from the vengeful methods of the revanchists, a French political organisation that hunted their opponents who had stolen their vision of French society. Within the current context, Smith defines revanchist urbanism as a claiming of territory by powerful groups from the marginalized and powerless to maintain their privileged positions, often through force. It is practiced through stigmatizing working-class lives and their living spaces (Slater, 2017). Revanchist urban politics adopt punitive measures to rid the city of the 'unwanted' to attract capital investment, characterized by vengeful sentiments from the state, court, politicians and civil society (MacLeod, 2002). Compared to most western countries where revanchist urbanism is driven by gentrification, in the Global South, revanchism is an impact of desiring to become an international tourist city (Swanson, 2007).

The theoretical frameworks of revanchist urbanism, bourgeois environmentalism, and environmental privilege help understand the relationship between the state, judiciary and influential social groups, and their role in forcefully taking unclaimed land from the urban poor. The following sections tell the story of Khori Gaon, its growth, the demolition order, and the events that took place during the forced eviction.

2. Settlement on a post-quarry landscape

Khori Gaon was situated at the Delhi and Faridabad border in the state of Haryana (Figure 1). Its location was also the foothills of the Aravalli range that was spread across four states. The hills have undergone a significant transformation in land use and ecological characteristic due to resource extraction, land-grabbing and real estate speculation from the colonial period. The forest in Haryana is the most degraded due to rapid urbanization, construction of highways through the wildlife habitats, and a strong mining lobby (Pananchikal, 2018).

In the pre-colonial period, in the 1700s, the area where the settlement developed fell under the common land of the nearby villages. The *Gujjar* community who resided in these villages were pastoralists and frequented the hills for herding their animals. The type of forest that was seen in this part of the Aravallis was semi-arid with thorny foliage (Sud, 2015). While the sparse vegetation had very few areas suitable for agriculture, it was integral to the *Gujjar's* need for grazing land as it provided fodder for the animals. After the British captured Delhi, the landscape was deemed aesthetically undesirable and termed wastelands. From 1870

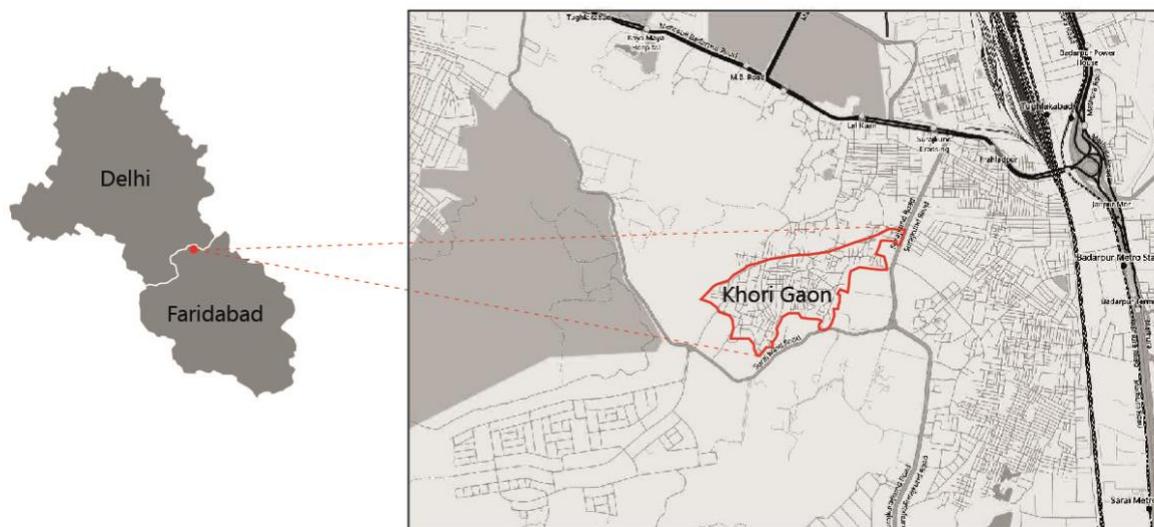


Figure 1

Khori Gaon's location at the Delhi and Faridabad (city in Haryana) border.
Image on right adapted from Snazzy Maps.

onwards, the hills saw many afforestation efforts for converting the arid land into hunting grounds and landscaped gardens, which altered the ecological character of the entire area. British forestry also involved the displacement of the local population, the building of fences, and the appointment of guards to stop the herders from accessing the land (Mann & Sehrawat, 2009). The hills were also mined for extracting quartzite, used in the construction of canals and roads in the 1870s and later during the building of the capital city of New Delhi from 1912 onwards (Crowley, 2020).

The colonial afforestation practices led to the *Gujjars* losing their livelihood and conversion to a different lifestyle. As a result, two interrelated processes started taking place in the villages in the 1900s (Chakravarty-Kaul, 1992). First, the subdivision and privatization of the village commons land and second, the transfer of the new private land parcel. Post-independence, in the 1950s, measures were taken to decongest the 'core city'—Delhi—by shifting the commercial, industrial and refugee settlement housing to the periphery (Punia & Cheema, 2013). Since the Delhi-Haryana hills were the Aravalli range's quartzite table, this period witnessed the leasing of hills to construction companies. In our study area, the *Gujjar* community leased the village common land to construction companies for mining. Khori Gaon was one of the many informal settlements that developed in this area during the mining boom at the Delhi-Haryana border.

Khori Gaon's growth took place in multiple phases. Around 1952, the first quarry workers settled 1.5 kilometres north of Khori Gaon on the Delhi side (Talib, 2010). However, in the 1960s, this area was cleared to make way for plotted developments, displacing residents. These families then shifted from Delhi to Faridabad, which later came to be known as old Khori Gaon; this marked the start of inhabitation (Satellite image May 2002 in Figure 2). Soon after, between 1970 and 1980, around 500 more dispossessed quarry workers settled down in old Khori Gaon with their families. Most workers had migrated



Figure 2

Satellite images showing Khori Gaon's growth. Left Top: May 2002, Left Bottom: January 2010, Right Top: September 2017, Right Bottom: August 2021. Source: Google Earth.

from Rajasthan, Uttar Pradesh and Haryana and some from West Bengal and Bihar. They desired to return to their villages, but they were trapped in the vicious cycle of debt to their employers due to the stone quarry industry's highly exploitative character and consequently could not go back (Talib, 2010). As their debt spiralled, the workers were forced to work to repay their loans rather than earn money, resulting in bonded labour.

A series of events took place between the 1970s to 2000s. On the one hand, in the late 1970s, the Haryana government started carving out village common land for the landless (Bhaviskar, 2018). At the same time, the Supreme Court's order in 1996 declared all uncultivated village council lands in the Aravalli to be handed to the Forest Department. Since most of the area where Khori Gaon stood fell under the uncultivated village common land, the *Gujjars* would lose their claim to the land.

Additionally, between 1992 to 2004, quarrying was banned in the Aravallis through multiple Supreme Court orders. As the lucrative stone quarrying business had also come to a halt, and to restrict land acquisition and redistribution, the *Gujjars* then started selling their

Figure 3

Government buildings in old Khori Gaon that were not touched during the demolition drive. The construction year is written on all buildings.



land parcels. Some joined hands with powerful bureaucrats and the land mafia, who started subdividing quarry land into small plots and selling it to the migrants and urban poor (Dogra, 2013).

In old Khori Gaon, the land mafia provided electric connections, arranged for borewells and sewage disposal through their networks with the Faridabad Municipal Corporation (MCF). MCF also built schools, a public park, and other government buildings between 1995 and 1996 (Figure 3). Most residents had rations cards and voter IDs issued by the Haryana state.

We are the original inhabitants of Khori Gaon. My ancestors were labourers in mining projects which started many decades ago. Our village was here even before Faridabad Municipal Corporation was established.

1. Old Khori Gaon resident (8)

Since 2004, the post-mining ban period has marked the start of the newer part of Khori Gaon (Satellite image January 2010 in Figure 2). During this phase, multiple informal settlements in Delhi witnessed forced evictions. Khori Gaon became home to many of these displaced citizens. Additionally, those who could not afford a place in the city also moved here, and villagers from nearby states migrated there for job opportunities. The majority

relocated to the city after selling their rural lands. By 2017, Khori Gaon had extended to cover all the available buildable land in the post-quarry landscape (Satellite image September 2017 in Figure 2). From 2017 to 2020, the settlement went through densification. The unbuilt areas from the earlier growth phases were transformed to allow more construction; at the same time, the older residents extended their houses vertically and horizontally. The dwellers spent their life's savings to purchase plots and build their homes. Contrary to the narrative peddled by the state and certain sections of the media that the residents were encroachers, all had bought their plots of land, albeit from the land mafia. The unsuspecting residents were even provided with fake property documents for the plots they purchased.

We have power of attorney papers for the land we bought. We have Delhi Aadhar card, driving license and other documents. Our children go to Delhi schools. How are we illegal?

2. New Khori Gaon resident (26)

During new Khori Gaon's growth, the unmarked border between Delhi and Faridabad created further complications. The stone wall on the west was the only demarcation. Hence the edge between the cities was ambiguous and open to interpretation (Figure 2). Additionally, the border uncertainty was augmented by the mafia's tactics of claiming that most of the land belonged to Delhi for their real estate business and the politicians for their vote bank politics.

When I inquired whether this land was in Haryana, I was told it was in Delhi until the church [marked in red in Figure 2]. Besides the land dealers, even people we consider trustworthy—politicians, police, forest department officials—assured us that this land is in Delhi. [MLAs] Sabiram Pehalwan and Ramesh Bidhuri both have repeatedly mentioned this as well. When these prominent politicians tell us, how can we not believe them?

3. New Khori Gaon resident (15)

In the newer part of Khori Gaon, the land mafia arranged electricity from Delhi's electrical grid through their nexus with Delhi politicians. They also started selling water from Delhi's borewell connections. Since the Delhi Development Authority (DDA) had constructed roads, provided electricity, sewage connection, dug tube wells and built public amenities in the neighbouring informal settlement in Delhi, a plot in Delhi was worth more than Faridabad because of the possibility of being regularized. Hence, the gangs claimed more than 70 per cent of Khori Gaon's land belonged to Delhi, misguiding the residents for profit.

I have electricity bills to prove that I am a Delhi resident. I even received a meter from the government. But just before the demolition, they disconnected our electricity, uprooted our meter box, and called us criminals for stealing the connection.

4. Khori Gaon resident (21) living at the edge of the border

This section outlined the historical transformation of the landscape from grazing land used by the local population to manicured gardens during the British period to mining land from the 1950s to 2000s and later an informal settlement after the mining ban. The hills were never a 'forest' or 'pure nature,' and by the time the settlement began taking shape, the

landscape had transcended its earlier ecological characteristics; it was a post-quarry landscape. Additionally, the pattern of injustice against marginalized communities and their displacement through bourgeois environmentalism that we see during Khori Gaon's demolition started in the colonial afforestation period.

The following section will discuss the court orders, the misleading forest encroacher argument and the events during the forced eviction.

3. Court orders: from protection to revanchism

The settlement witnessed multiple demolitions from 2010 onwards, leading to two court cases in the High Court until 2016. As per a Haryana state official, Khori Gaon was discovered in 2010 during a reconnaissance exercise to develop this land.¹ Paradoxically, Khori Gaon's growth gained momentum after this episode. Comparing satellite images of 2010 and 2017 in Figure 2 reveals that the settlement had quadrupled in size after the state's 'supposed' discovery. The questions that the state has refused to engage with are: Why was no attempt made by them to stop the growth of the settlement? Why were the residents not informed about the status of the land? Why was no board installed to indicate that this was forest or government land? Instead, state officials from the Forest Department, MCF and police have taken bribes from time to time for not demolishing the residents' homes and given assurances that the settlement will be regularized (Barton, 2021). In 2013-2014, during the pre-election period, Khori Gaon residents were approached by multiple political parties from Delhi and Faridabad, asking for votes in return for services. Those with Delhi identity documents were targeted by Delhi politicians, and those with Faridabad documents by politicians from Faridabad.

The two High Court cases continued till 2016, with the Tourism department, MCF and the Forest department claiming ownership of the land on which Khori Gaon stood. In both cases, state officials urged the court to pass orders for vacating the land. The different state agencies sent eviction notices to Khori Gaon's residents, asking them to leave within a few days or prove their land titles instead of checking their eligibility under the rehabilitation policy.

While the final judgments in both cases had concluded that residents were encroachers, they upheld the constitutional rights of the informal settlement dwellers and instructed the state authorities to determine the eligibility of the residents for rehabilitation. One judgement² even reprimanded the state for misleading the urban poor, underlining that the authorities' reports were lacking context and the official assessment of residents' occupation length 'was/is a farce' (CWP No. 19910/2014, p. 8). The other judgement³ was exemplary

¹ Mentioned in petitions in the *Khori Gaon Colony Kalyan Samiti Vs. State of Haryana & Ors.* CWP No.19910/2014 in the High Court.

² *Khori Gaon Colony Kalyan Samiti Vs. State of Haryana & Ors.* CWP No.19910/2014 in the High Court decided in 2016.

³ *Khori Gaon Residents Welfare Association Vs. State of Haryana & Ors.* CWP No.19148/2010 in the High Court decided in 2016.

since it highlighted the inter-related issues of migration, livelihood, and affordable housing and urged the state to develop a comprehensive national level policy keeping social justice at its core (CWP No. 19148/2010).

Instead of taking the High Court's suggestions on board, MCF bypassed these orders and approached the Supreme Court in 2017 and then again in March 2020 for permission to remove the 'unauthorised structures on forest land.' Simultaneously, there was increasing pressure from bourgeois environmentalists to eliminate 'all encroachments' from the Aravalli forest land (Arora, 2015; Ohrie, 2018). MCF's strategy to appeal to the Supreme Court needs to be understood within the context of the highest court controlling all forest matters in the country and excluding the lower courts. In the last two decades, the Supreme Court of India has taken over forest governance by claiming the need to protect the forest's fragile status, which has led to significant adverse social and ecological outcomes (Rosencranz & L  l  , 2008). The judiciary's power has been elevated by support from the bourgeois society through their elite activism and Public Interest Litigations (PIL), with disastrous consequences for the rights of the poor (Shukla, 2006). The Supreme Court's framing of informal settlements as a 'nuisance' and 'polluters' has been one of the main drivers of their demolitions from 2000 onward (Ghertner, 2008). The other significant factor has been the increased financialization of forests. Analyzing the Apex Court's orders from 1996 to 2006, Menon and Kohli (2021) argue that the judicial and environmental experts have treated conservation as a techno-managerial exercise disconnected from the on-ground socio-ecological factors. As a result, there has been an increase in the marketization of forests, diversions approved by the state, regeneration in other locations and heightened dispossession of the underprivileged.

In response to MCF's request, the Supreme Court ordered the state to 'remove encroachments ... not later than six weeks from' 7 June 2021, during COVID-19, 'and submit a compliance report'.⁴ The Supreme Court's decision was in discordance with the High Court's ruling and represented another setback for social justice within the escalating Supreme Court-led demolitions in the country. Between 14 July and 17 August, the state violently razed the settlement without finalizing the rehabilitation policy or providing temporary accommodation. One would expect the court to reprimand the heavy-handed approach of the police; instead, the court sanctioned it. The 7 June 2021 Supreme Court order⁵ mentioned:

The state in general and the local police in particular, shall give necessary and adequate logistical support to enable the Corporation to implement the directions given by us to evict the occupants/encroachers including by forcible eviction from the subject forest land and to clear all the encroachments therefrom.

Alarming, the demolition was also carried out without a survey. As a result, there is no record of who resided there. The settlement's location at the border of Delhi and Faridabad further complicates this situation. Most residents possess identity documents of

⁴ *Sarina Sarkar & Ors. Vs. State of Haryana & Ors.* WP(C) No. 592/2021, in the Supreme Court decided in 2022.

⁵ *Sarina Sarkar & Ors. Vs. State of Haryana & Ors.* WP(C) No. 592/2021, in the Supreme Court decided in 2022.

Delhi; however, the Delhi government has denied any responsibility for rehabilitation. On the other hand, the Haryana government has repeatedly mentioned only voters of their constituency will be eligible. The residents are now struggling to prove that they lived in Khori Gaon to be eligible for rehabilitation.

This section showed the different attitudes of the High Court and Supreme Court judges towards the housing rights of the poor and MCF's strategy to exploit the rise of bourgeois environmentalism in the Apex Court. Even though the High Court orders acknowledged the rights of the yet-to-be-displaced to be resettled, eviction seemed the only possible outcome. Displacement becomes an inescapable outcome within the development paradigm where development projects are used to justify uprooting the communities, and the law has been utilized by state power to achieve this (Ramanathan, 1996). As informal settlements are often missing from urban planning visions, their clearance gets legitimized through the enforcement of legality. This points to a larger argument this paper attempts to make: within bourgeois environmentalism and revanchist urbanism, there is no space for the urban poor.

The next section will delve into the eviction order by situating it within the country's broader state processes connected to forest conservation and environmental laws.

4. Forest encroacher tag despite no forest

In this section, I demonstrate that the 'forest encroacher' label used to stigmatize the residents of Khori Gaon is fabricated. Additionally, despite the displacement being enacted in the name of forest conservation, the state's actions indicate a capitalist agenda. Hence, by lending support to the state, the court has advanced their revanchist urbanism.

While Khori Gaon residents have been repeatedly called 'forest encroachers' in the court and the media, there are multiple issues with that description. The hill was never a wilderness generally associated with the word 'forest,' and neither was it devoid of human habitation (Sud, 2015). It has had a complex history of human dependencies and territorial conflict. Indigenous communities and marginalized groups have historically lived alongside the hilly vegetation and have relied on it for their subsistence. Whatever scanty foliage was present in the area where the settlement stood was destroyed during the unscrupulous quarrying period. By the time quarrying had dwindled, the landscape had become a site of degradation, pollution and ecological deterioration. Hence the disappearance of the 'forest' was due to the private and state-led quarrying prior to the settlement's development. The satellite image of May 2002 in Figure 2 also highlights that there was no forest when Khori Gaon started developing. Ergo the residents cannot infringe on forest land since it did not exist when they settled. The irony is that the residents had planted trees in their backyards and courtyards (Figure 5). If they are indicted, is it for converting the abandoned and ecologically degraded post-quarry landscape into habitable land?

| | |
|-----------------------------------|---|
| 1950 | Quarrying started, and the appearance of worker settlements on the Delhi side. |
| 1970 | Khori Gaon began developing. |
| 1980 | Forest Conservation Act comes into force. |
| 1992 | Quarrying was checked by the Supreme Court, citing workers' health issues ecological issues. Parts of the Ridge were notified as regulated under the Punjab Land Preservation Act (PLPA) of 1900. |
| 2004 | Supreme Court notified areas under sections 4 & 5 of PLPA as 'deemed forest'. PLPA land has to be treated as forest land henceforth, irrespective of ownership, and no construction is permitted without permission. |
| 2009 | The Supreme Court ordered a complete ban on mining. |
| 2014 | Construction of hotels, commercial complexes and the religious centre beside Khori Gaon was completed. |
| 2017 | Haryana state proposes PLPA amendments citing that PLPA is not a forest. |
| 2018 September | The Supreme Court ordered the demolition of Kant Enclave, a high-end property near Khori Gaon. Compensation was to be given. Haryana state proposed PLPA amendment, which was stayed by the Supreme court. |
| 2019 March | State attempts to amend the PLPA again to allow real estate development but is again stayed by the Supreme Court. |
| 2020 June | The Forest Department submits 123 violations of PLPA land in Faridabad district, including Khori Gaon and the high-end developments beside it. |
| 2021 March | Haryana state requests permission to restart mining in the Aravallis, citing that pandemic has derailed the economy |
| 2021 June | Supreme Court ordered the demolition of Khori Gaon within four weeks later extended to six weeks. |
| 2021 July - August | Khori Gaon is demolished. Lawyers representing Khori Gaon residents highlight that farmhouses and other developments on forest land continue to stand. |
| 2021 September | Haryana state issued notice to 129 farmhouses and partially demolished 6 (boundary walls only). Supreme Court asks the state to provide a chart of all violations and justification for non-demolition. |
| 2021 October | Haryana state pushes forward with amendments to the PLPA, and the Ministry of Environment, Forests and Climate Change propose amendments to the Forest Conservation Act to allow diversion of forest land. Demolition of farmhouses and hotels stayed. Court case pending. |

Figure 4

Chronology of the events starting with the formation of Khori Gaon leading up to its dispossession order, situated within the context of the different measures taken by the court and the state related to the forest or environment conservation that impacted the settlement.

Figure 5

Post demolition image showing the trees planted by the residents and their broken houses.



As per the law, however, the ground reality is immaterial. If a plot of land has been designated as a ‘forest’ in official documents, it will be considered as such regardless of whether the forest only existed on paper, and anyone found engaging in non-forest activity can be evicted. However, the process of notification of the forest was convoluted and raises many concerns. The declaration of the ‘deemed forest’ status in 2004, as per the court orders, based on the Punjab Land Preservation Act (PLPA), came into force 34 years after the settlement’s emergence. It can be argued that it is a retroactive law that criminalized the residents of Old Khori Gaon for an act committed before the law came into existence. But the Haryana Government (2021) has maintained that the land on which Khori Gaon developed has always been forest land. There are several problems with this claim.

First is the multiplicity of interpretations of the PLPA law. The PLPA Act was a colonial law initiated to regulate land use for soil and water conservation in 1900. The PLPA notifications are temporary restrictions and expire after a specified period of time (Public Hearing Report, 2021). However, due to the depleting forest cover in the state, the Supreme Court announced it to be a permanent regulation by declaring that no construction or non-forest activity can take place on this land, irrespective of ownership and without permission,⁶ thereby bypassing the PLPA law’s initial intention. The Court argued that this step was necessary to restrict tree felling, conversion of agricultural land, quarrying, and grazing in Haryana as the forest cover here is a low figure of 3.59 per cent.

The second issue is the lack of clarity on the ground. The forest’s demarcation and clarification of PLPA lands are still incomplete and were the basis for debate in the court post-demolition of Khori Gaon. There was no demarcation or boards on the site claiming the status of the land, whether government or forest, where the settlement developed. They

⁶ *M.C.Mehta Vs. Union of India & Ors.* (2008), WP(C) No. 4677/1985 in the Supreme Court decided in 2008. By these orders, areas notified under Section 4 of PLPA are ‘deemed forests’ and the forest laws of IFA are applicable. If construction activities are to be undertaken, they have to be done after permissions under the FCA.

were installed only after the court's order for demolition was given after June 2021. The third problem is the Haryana government's deceitful tactics and selective implementation of court orders. As per the court's directions, multiple farmhouses, hotels, government buildings and institutions that had violated the forest law should have met the same fate as Khori Gaon. That, however, did not happen.

Soon after Khori Gaon was flattened, the high-end development's violations were brought to the judges' notice. The extent of the privileged group's violation far exceeds those of the informal settlement dwellers. The former covered 1235.5 acres out of the 1426.5 acres of land identified by the forest department as under encroachment, which is equivalent to 86.6 per cent.⁷ In comparison, Khori Gaon was spread over only 6.8 per cent of the land. In response, the Haryana Government filed an affidavit⁸ in court proclaiming that 39.35 per cent of the city has to be erased if it complies with its order.

The lands...include both government and private lands...structures ...including schools, colleges, hospitals, police stations, roads, transmission lines, government buildings, Defence Establishments, infrastructure, residential houses including those developed by the Government Corporations...the demolitions...on a mammoth scale and beyond the capacity of the State Government...create serious and unparalleled law and order problems...raises a very pertinent issue regarding the constitutional rights of the people to such lands...where the constructions...undertaken after taking requisite approvals... Haryana Government (2021).⁸

In its submission, the state drew attention to the high socio-economic cost of following the court's orders and emphasized the constitutional rights of those who built structures. In contrast, in Khori Gaon's case, the state had approached the court for a demolition order claiming they were on forest land, while at the same time seeking permission to resume mining in the Aravallis, citing economic slowdown and loss of jobs during the pandemic (Special Correspondent, 2021). The hypocrisy goes further than this. In an earlier affidavit to the NGT in 2017, the Haryana government had argued that PLPA needs reviewing because it is a 100-year-old Act and Aravallis is 'not forest' (Pubby, 2017). Whereas it utilised the 'PLPA is equal to forest' argument to demolish Khori Gaon between March and August 2021. Later, just after the settlement was razed, the state again attempted to redefine the Aravallis by concluding that this area was uncultivable land; hence the forest did not exist (Bhatnagar, 2021). While proposing amendments to the PLPA in their 2021 affidavit, the state has added a clause:

The provisions of this [PLPA] Act shall not apply to –

1. the lands included in the final development plans, any other town improvement plans or schemes ...

⁷ Forest Department, Haryana (2020) *Report of District Gurugram, Mewat and Faridabad*, Forest Department, Haryana in OA No. 04 of 2013 (Sonya Ghosh Vs. State of Haryana).

⁸ Haryana Government (2021). Affidavit submitted in the matter of *Satpal & Ors. Vs. Union of India & Ors.* in the Supreme Court.

2. the lands forming part of any public infrastructure, including rails, roads, canals, public institutions, government or public establishments created or developed up to a date prior to the date of the publication of Punjab Land Preservation (Haryana Amendment) Act, 2019 in the Official Gazette... Haryana Government (2021)

Environmentalists have raised concerns that the state's position is a ruse to protect the elite constructions on forest land (Nandi, 2021). Similarly, the state's move was also criticized by Haryana's ex-forest minister, saying it was a deliberate attempt to obfuscate the main issue, dilute the restrictions of the PLPA and open it up for mining and other developments (HT Correspondent, 2021). These developments opened up the legal question of whether PLPA land can be considered forest land or not and what restrictions apply to it (Bhatia, 2021). A stay order was given on further demolitions until the dilemma of forest or not was solved. While this stopped the razing of the farmhouses, Khori Gaon residents have been subjected to multiple violent demolitions while the legal process continued.

In March 2022, while the court case continued, the Haryana state cleared a portion of the land filled with the rubble of Khori Gaon's houses after demolition to create a parking space for an International Fair organized by the Surajkund Mela Authority and the Haryana Tourism Department. While arguing in favour of demolishing the informal settlement, the state lawyers claimed it fell under what is termed 'non-forest' activity. Ironically, in this instance, the state had turned the area into a parking space—another 'non-forest' activity. When this was mentioned in court by Khori Gaon's lawyers, the judges remarked:⁹

...it ... brought to our notice that the land from where unauthorized structures have been removed, is being misused by the locals...We direct the Commissioner, Municipal Corporation, Faridabad to ensure that any type of misuse of the subject land is stopped with immediate effect..the Superintendent of Police, Faridabad shall provide necessary police assistance...(India SC, 2022).

The deception is clearly evident here, especially given that the Haryana Tourism Department organised the Surajkund Fair, and the police regularly patrolled the parking lot.

On 21 July 2022, almost a year from the stay order for demolitions, the final court order declared that certain lands under PLPA are to be considered forests and non-forest activity is permitted with the prior permission of the central government, the state government or any competent authority (CWP No. 10294/2013).¹⁰

The final court order hinges on legality being the deciding factor. It is no surprise that Khori Gaon did not find a place in both the development plans of Faridabad prepared for 2001 and 2031. The state's practice of strategically unmapping informal settlements from planning documents to justify their erasure is well known (A. Roy, 2011). In this case, there was no attempt to veil the systemic exclusion of the poor and the bias towards the privileged. The exemptions sought by the state throughout the legal process were a subterfuge to legalize high-end developments and criminalize informal settlements. Additionally, obfuscation was

⁹ Court order 31 March 2022 in the matter of *Shanti Devi & Ors. Vs. State of Haryana & Ors.* W.P.(C) No.-1023/2021, in the Supreme Court decided in 2022.

¹⁰ *Narinder Singh & Ors. Vs. Divesh Bhatani & Ors.* CWP No. 10294/2013 in the Supreme Court decided in 2022.



Figure 6

The parking lot for the International Fair in March 2022.

used as a strategy to prolong the legal case and protect the aesthetically pleasing developments of the privileged group. The state's double standards and the court's apathy towards its vulnerable citizens point to the systemic injustice against the urban poor and the bourgeois society that encourages this behaviour.

Since colonial times, the various forms of conservation or afforestation efforts undertaken have led to socio-economic inequality as it has served the purpose of the privileged and criminalized the poor and the indigenous communities (Sud, 2017). The marginalized populations have historically been excluded from any discussion about forest conservation even though they were directly impacted by it. In recent years, environmentalists and citizen groups have been spreading awareness about the ecological

significance of the Aravallis, pushing back against the state's amendments and calling for its re-greening. Yet in their conservation discourses, the hill's degradation is presented as a linear story of deforestation due to rampant urbanization, which must be reversed through afforestation and restricting access (R. Agarwal, 2010; Arora, 2015; R. Menon, 2018). Any discussion about the rights of the marginalized communities living in the forests is missing from these conversations, often giving the impression that the hill was a pristine landscape without human presence. These narratives erase the contested history of the forest and the communities living in there. In Khori Gaon's case, the court engaged in colonial continuity by enforcing a law created to control land during the British period without addressing the implications for the current context. The settlement's demolition parallels how the communities living in the forests were displaced by framing them as criminals within the conservation discourses in the colonial period.

The next section will discuss the attitudes toward the urban poor by focusing on the demolition drive, the contentious rehabilitation process and contextualising it within the pandemic.

5. Criminalisation and dehumanisation during eviction

The first eviction notice was sent to the residents on 13 March 2020, providing them with seven days to vacate. The nationwide lockdown on 24 March 2020 to control COVID-19 stopped the impending demolition. On 14 September 2020, during peak COVID-19 in the first wave, when the number of infected people was 92,071¹¹ nationwide, the state razed the settlement partially. Realizing their lack of options, the community sent a letter to the state asking it to conduct a survey and rehabilitate them. However, the state did not engage with the residents; instead, it undertook a demolition drive again on 2 April 2021. This was during the second wave of COVID-19, the day India recorded 81,466 cases. The second wave had a catastrophic impact on the residents. By June 2021, they had no savings to offset the health and economic difficulties associated with forced eviction. After the 7 June 2021 court order for demolition, the state provided eviction notices giving residents two days to move. The nationwide COVID-19 numbers were 92,596.

On the one hand, the state's act of displacement during COVID-19 endangered the lives of the vulnerable. On the other hand, the Supreme Court neither offered enough time to ascertain the forest's factual position nor allowed the residents an opportunity to present their claims. In their haste to give a decision, the judges did not even insist on a temporary accommodation or a rehabilitation policy prior to demolition; rather, the focus was placed on the deadline by which the order had to be implemented. Even when appeals were made highlighting the pandemic and the humanitarian crisis that might unfold, the judges were adamant. Instead, they admonished the lawyers, saying:

¹¹ All COVID figures based on data from NDTV. Available at <https://www.ndtv.com/coronavirus/fullcoverage>.

This is about forest land and this is more important. You are wearing two hats. You are now talking about humanity, but when you come for environmental law matter, you will talk about environmental rights (Roy, 2021).

The above quote encapsulates the more significant issue here: the rhetoric that presents these cases as a battle between forest conservation and social justice. The inherently biased arguments tend to view these as binaries and construe that the housing rights of the poor will threaten the forests. This ideology often leads to coercive environmentalism, where any means is considered justifiable to protect the forest. Hence, the court did not hesitate to grant the state the power to carry out the demolitions as they saw fit and left the rehabilitation process up to them. When the lawyers argued that the right to rehabilitation could not be denied, the judges thundered that,

As far as forests are concerned, there can be no question of compromise. This is irrespective of policy and as to whether the State wants to accommodate the residents or not is up to them. Land grabbers are talking of fairness? (Roy, 2021).

The erosion of citizenship is constructed discursively by equating informal settlements to 'nuisance,' 'polluters' and, in this case, land grabbers and forest encroachers (Ghertner, 2008). These discursive practices have an impact beyond the courtroom (Bhan, 2009). Emboldened by the court's support, the state imposed Section 144, thereby prohibiting the assembly of five or more people in Khorī Gaon. This was done to stop the residents from organizing. Even mobile phone towers were uprooted to obstruct communication between residents and those sympathetic towards them.

There was a heavy police presence in the settlement for a month before the demolition, who regularly threatened the residents and inflicted violence whenever they gathered to protest or strategize peacefully. Community leaders and activists were arrested and often locked up in undisclosed locations for days. The state had already converted the settlement into prison; on top of that, the residents were also arrested while heading to different locations in Delhi to organise a peaceful protest. When questioned about the restrictions on gathering and heavy policing, the Police Commissioner responded that:

During removal of encroachment, heavy protest may be initiated ...and there is also a possibility that some miscreants may take advantage of the situation to create unrest that can lead to law and order issue...It has been made to appear to me that the entry of all persons other than staff on duty, including police personnel, is likely to disturb the smooth removal of encroachment...Covid guidelines were also not being followed...(Dayal, 2021a)

The residents were criminalized even before they had committed any crime. Vocal residents and community leaders were arrested and slapped with false charges. The deliberate stigmatization of the community was also advanced by sections of the media. An impression was created that the community was violent and dangerous, which the police had to tame through coercive actions. The public perception that was created positioned the residents as the enemy and bad citizens, while the police were seen as duty-bound good citizens obeying the court's orders and maintaining law and order (Hewamanne, 2009).

The above quote also shows that the police started referring to the residents as ‘encroachments’ and not encroachers anymore during the demolition. This process of dehumanization is a socio-political as well as a psychological process through which certain groups are denied human associations such that they are then identified as lesser than humans (Varvin, 2017). This threatens their basic rights and endangers their life and safety. The heavy-handed policing led to a few altercations between police and residents, which were used to justify violence against them. One resident observed:

They were torturing us, and their methods became even more inhumane when we did not leave. While men and young boys had it the worst, they misbehaved with ladies and children and did not leave the elderly too ... they even latched at breastfeeding mothers.

5. Khorī Gaon resident (33)

In addition, the press were barred from entering the settlement to document the happenings. Media restrictions gave the state officials a free pass to lie and twist the narratives. When residents shared videos¹² and photos through reporters and activists, the police blatantly denied the atrocities.

There is a video that is circulating but it is impossible to comment on the nature of the video, when it is, who are the people, whether it is doctored, not doctored...The demolition took place peacefully to my knowledge, I don’t know what is being alleged but there was no lathi charge done by Faridabad Police...(Dayal, 2021b)

The settlement’s access to electricity and water was disrupted the day the demolition order was announced. The residents had to survive without basic services for more than a month. Moreover, the state provided no temporary shelter or aid during the demolition. When NGOs and civil society attempted to distribute food and provide assistance, they were blocked by the police citing contamination fears due to COVID-19. The pandemic was weaponized against the poor. The physical distancing laws and sanitation advice were misused to muzzle the media, stop external help and defend the human rights violation. While the gross violation of human rights was taking place on the ground, MCF created a

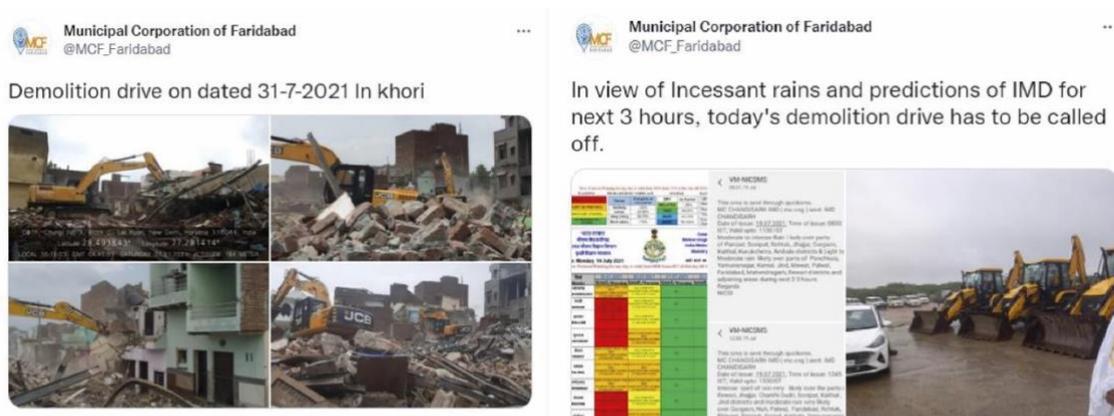


Figure 7

Municipal Corporation of Faridabad’s tweets. Source: Twitter.

¹² <https://twitter.com/Vimalbhai11/status/1410156186586861572>

spectacle of the suffering of the poor by tweeting about it (Figure 7). The bourgeois environmentalists, on the other hand, while concerned with the atrocities against the poor, celebrated the news of demolition as their demand for getting their forest back was answered.¹³

The border ambiguity that was created and maintained throughout the development of the settlement was dissolved by declaring that Khori Gaon fell in Faridabad, thereby rendering the majority of the residents who possessed identity cards of Delhi ineligible for rehabilitation or compensation. Delhi government has wiped their hands clean of this mess by declaring they are not the land-owning agency. In contrast, the Haryana government finalized its rehabilitation policy two months after the demolition and has purposely restricted the eligibility criteria to exclude those who are not voters. The lack of a survey is a strategy to erase the presence of the poor from the city. Similarly, drawing the border between the city after the eviction and delaying the rehabilitation policy are exclusionary practices.

The rehabilitation process has been moving at a glacial pace. The number of eligible households per MCF is 1,009 out of the approximate 10,000 families, a mere 10 per cent. Even among eligible residents, most have no money to pay these flats' deposit, monthly rent totalling Rs 3,77,500 (plus interest on the loan amount), and charges for electricity, water and sewerage. These flats were built in 2006 for those with relatively stable incomes, not those in economically weaker situations, especially after being evicted. Even one year after the demolition, these replacement flats are uninhabitable (Figure 8). The entrance to the buildings was extremely filthy and unhygienic, with garbage lying everywhere and sewage



Figure 8
Rehabilitation flats

¹³ This observation is based on tweets during the demolition period.
<https://twitter.com/nahluwalia20/status/1425405270033723392>;
<https://twitter.com/yadav8897/status/1407383882987569154>;
<https://twitter.com/ravipahuja/status/1425792314794930176>.

systems blocked or incomplete. Due to waterlogging, this area has become a health hazard. The flats, too, were unsafe, as they had no doors, windows and toilet fixtures were missing. At every step, the poor have been treated with contempt. The rehabilitation process was discussed in court as a favour instead of the residents' rights. Hence, it is not surprising that the deplorable condition of the accommodation doesn't bother the state officials.

6. Conclusion: No city for the poor

To demolish the homes of the most vulnerable during a raging pandemic, knowing very well that it is a death sentence, sends a clear message: there is no place in the city for the poor. Further, the lack of due process during the forced eviction, the human rights violation and the rehabilitation process steeped in inequity show that there is no consequence or accountability for this deliberate erasure. This undermining of the urban poor's claim to the city and their rights was possible through the revanchist project arising from the nature vs. society argument but is rooted in an anti-poor ideology.

Even when conservationists have asked for increased interaction with indigenous communities, the justifications for environmental protection are embedded within a way of thinking that views informal settlements as an opposition. Informal settlement dwellers are the worst affected among all environmental displacements due to their lack of land or property rights and their often exploitative relationships with the different actors—politicians, police, land mafia, and employers. Hence conservationists who keep pushing for their displacement to fix environmental problems within the legal-political system where they will be dispossessed and exposed to violent state oppression are part of the ecosystem that privileges conceptions of pristine nature over social concerns. This is not just a consequence of finding a solution for the environmental emergency within the increased financialisation of forests but is driven by a revanchist ideology.

The revanchist project is advanced through the criminalisation and dehumanisation of the poor. Language played a vital role in the criminalisation of Khori Gaon residents. The court, state, media and most environmentalists continuously referred to them as encroachers and land-grabbers. The state's environmentalism is characterised by consistently attempting to deceive the court, twist the evidence, and criminalise the disadvantaged group as they continue to violate the forest. However, the refusal of the judges to hear the grievances of the vulnerable population throughout the legal process and the use of denigratory terms 'encroachers,' 'land grabber' and 'illegal' by the groups supposedly advocating for a just process has legitimized treating the urban poor inhumanely. Informal settlement dwellers are seen as 'improper citizens' who are undeserving of constitutional rights.

Beyond using criminalizing language, the judiciary has refused to question the mafia, state officials, and the forest department's role. By not acknowledging the state's failure to stop the land mafia, the court deflected the blame on the informal settlement dwellers and framed them as the enemy. Dehumanization goes hand in hand with criminalisation during forced evictions. By rejecting them as humans, the settlement could be turned into a prison

and a violent space. When this becomes part of a political and legal narrative, the violence against the poor is magnified.

Since the poor are no longer viewed as humans or citizens, their suffering is seen as punishment. The MCF's tweets were a perverse display of sadistic pleasure and pointed to a culture that valorizes punishment and incarceration of the urban poor. Through their 'othering,' their narratives, claims, and even cries for help are denied. They are seen as disposable. The squalid living conditions in the rehabilitation flats are a reminder that the state does not consider them any different than the animals living in that place. The media, judiciary, police and civil society all play a part in the dehumanization mechanism. Even though the bourgeois environmentalists expressed concern over the violent eviction of the poor in Khori Gaon, they did not demand a stop to displacement. The outcome - the eviction of a human settlement and the promise of re-greening in its place—was to their satisfaction; therefore, they preferred to remain silent regarding the social cost of displacement.

Dehumanization and criminalization processes build upon the existing prejudices in society and amplify them. The privileged group unsees the merciless treatment and deprivation of legal justice by relegating them as the 'other' and 'non-human.' The systematic erasure of the poor from maps, government records and denial of a survey has made Khori Gaon residents' position extremely vulnerable. Even their existence is not acknowledged.

Compared to the United Kingdom, where state-led evictions have become the new frontier of the revanchist project (Cooper & Paton, 2017), Supreme Court-led evictions have become the new frontier in India. A few months after Khori Gaon's demolition, the court declared:

All major cities have turned into slums. Look at any city...That is happening everywhere. Let us rise to reality and think how the problem has to be resolved... The primary responsibility of ensuring that there is no encroachment...That is the sad story and it is ultimately the taxpayers' money which will go down the drain (Kakkar, 2021).

Khori Gaon residents have been asking the same question since the demolition order was issued—Where should we go? But, it has been met with silence. The residents know they have been abandoned by—the politicians from Delhi and Haryana who claimed their votes, the Supreme Court who claims to protect Indian forests by sacrificing them and the bourgeois society who extracted their labour. There is no place for the poor in the city.

Acknowledgements

While the words in this article are mine, the arguments stem from the collective work of the academics, activists, lawyers and community members who have come together to fight for Khori Gaon. I am immensely grateful to the late Vimal Bhai, Neelesh Kumar, Manju Menon, Srishti Agnihotri and Tripti Poddar for the discussions.

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