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PROTECTION OF AGRICULTURAL LAND FROM CONVERSION AND MISUSE: A LEGAL ANALYSIS

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ABSTRACT

Agricultural land is a fundamental natural and economic resource that supports food security, rural livelihoods, ecological stability and the agricultural economy. Rapid urbanisation, industrialisation, infrastructure development and speculative real-estate activities have increasingly created pressure for the conversion of agricultural land into residential, commercial and industrial uses. Although land-use conversion may sometimes be justified by legitimate developmental requirements, uncontrolled conversion and illegal misuse can result in the permanent loss of productive agricultural land, environmental degradation, pressure on water resources, unplanned urbanisation and displacement of agricultural communities. This paper critically examines the legal framework governing the protection of agricultural land from conversion and misuse in India, with particular emphasis on Tamil Nadu. The study adopts a qualitative doctrinal methodology based on constitutional provisions, statutes, rules, judicial decisions, government reports and scholarly literature. The paper examines the constitutional principles under Articles 21, 48A and 51A(g), the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013, the Environment (Protection) Act, 1986, and the Tamil Nadu Town and Country Planning Act, 1971. Particular attention is given to Sections 47, 47-A, 48, 49, 56 and 57 of the Tamil Nadu Act and the Tamil Nadu Combined Development and Building Rules, 2019. Judicial trends demonstrate that statutory development plans and zoning regulations cannot be casually diluted by administrative action. The paper concludes that stronger monitoring, transparent

conversion procedures, protection of fertile and environmentally sensitive agricultural land, digital land records, public participation and effective enforcement are necessary to achieve a balance between development and agricultural-land conservation. This paper critically examines the legal framework governing the protection of agricultural land from conversion and misuse in India, with particular emphasis on Tamil Nadu. The study adopts a qualitative doctrinal methodology based on constitutional provisions, statutes, rules, judicial decisions, government reports and scholarly literature. The paper examines the constitutional principles under Articles 21, 48A and 51A(g), the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013, the Environment (Protection) Act, 1986, and the Tamil Nadu Town and Country Planning Act, 1971. Particular attention is given to Sections 47, 47-A, 48, 49, 56 and 57 of the Tamil Nadu Act and the Tamil Nadu Combined Development and Building Rules, 2019. Judicial trends demonstrate that statutory development plans and zoning regulations cannot be casually diluted by administrative action. The paper concludes that stronger monitoring, transparent conversion procedures, protection of fertile and environmentally sensitive agricultural land, digital land records, public participation and effective enforcement are necessary to achieve a balance between development and agricultural-land conservation.

Keywords: Agricultural Land, Land Conversion, Land Use Regulation, Food Security, Town Planning, Environmental Protection

1. INTRODUCTION & BACKGROUND

Agricultural land occupies a central position in the economic and social structure of India. Agriculture provides food, employment, raw materials and livelihood opportunities to a substantial section of the population. Agricultural land is therefore not merely a privately owned asset; it also possesses wider social, economic and environmental significance. The rapid growth of cities and towns has, however, increased the demand for land for housing, industries, commercial establishments, roads, educational institutions and other infrastructure. As urban boundaries expand, agricultural land situated around cities often becomes the target of conversion. The conversion of agricultural land into non-agricultural uses may generate economic benefits and facilitate planned development, but unregulated conversion may permanently reduce productive agricultural land. The problem becomes more serious when agricultural land is converted without obtaining the permission required by law. Illegal layouts, unauthorised buildings, commercial activities, dumping of waste, industrial use and obstruction

of irrigation channels may amount to misuse of land and may adversely affect neighbouring agricultural lands. The constitutional framework provides important principles relevant to this issue. Article 21 has been judicially interpreted to include protection of life and a healthy environment. Article 48A directs the State to protect and improve the environment, while Article 51A(g) imposes a fundamental duty upon citizens to protect and improve the natural environment. Land-use regulation is substantially governed by State law. Consequently, India does not have one single comprehensive central statute governing every agricultural-to-non-agricultural conversion. Different States have adopted different mechanisms. This paper therefore examines the general Indian position while giving particular emphasis to Tamil Nadu. In Tamil Nadu, the Tamil Nadu Town and Country Planning Act, 1971 provides an important statutory mechanism for regulating development and changes in land use. Section 47 requires land use and development to conform to the applicable development plan. Section 47-A deals with development in areas outside planning areas and specifically requires prior concurrence in relation to wet lands. Sections 48 and 49 regulate development and require planning permission in specified circumstances. Sections 56 and 57 provide mechanisms for dealing with unauthorised development and stopping such development. The Tamil Nadu Combined Development and Building Rules, 2019 further provide a framework for urban planning, regulation of land use and building construction across local bodies. The contemporary importance of the subject has been highlighted by the Supreme Court's 2026 decision in *Harbinder Singh Sekhon v. State of Punjab*, where the Court emphasised the binding character of statutory Master Plans and held that land use contrary to an operative Master Plan cannot be legitimised merely through administrative approval. This research therefore examines whether the existing legal framework adequately protects agricultural land and whether stronger mechanisms are required to prevent its conversion and misuse.

2. STATEMENT OF THE PROBLEM

The increasing conversion of agricultural land for residential, industrial, commercial and infrastructural purposes raises a significant legal and policy problem. The principal difficulty is the absence of a uniform national regulatory mechanism governing all forms of agricultural-land conversion. Since land and agriculture fall substantially within the State regulatory domain, the applicable procedure differs from State to State. This creates variations in standards, authorities, procedures and enforcement. In Tamil Nadu, statutory safeguards exist under the Town and Country Planning Act, 1971 and related rules. Nevertheless, practical difficulties arise through unauthorised layouts, construction without planning permission,

misuse of land, weak enforcement, procedural delays and insufficient coordination between revenue, planning, local-government and environmental authorities. The research therefore addresses the following central problem: Whether the existing legal and regulatory framework in India, particularly in Tamil Nadu, provides an effective mechanism to prevent the unnecessary conversion and misuse of agricultural land while permitting legitimate and planned development? The research further examines whether development plans, environmental safeguards and judicial review are sufficient to prevent arbitrary or unauthorised changes in land use.¹

3. RESEARCH OBJECTIVES

The primary objectives of this research paper are:

1. **To examine** the constitutional and statutory framework relating to the protection and conversion of agricultural land.
2. **To critically analyse** the Tamil Nadu Town and Country Planning Act, 1971 and the Tamil Nadu Combined Development and Building Rules, 2019 in relation to land-use control.
3. **To examine** judicial trends concerning agricultural land conversion, development plans, unauthorised construction and environmental protection.²
4. **To identify** legal and administrative deficiencies that contribute to the misuse and unregulated conversion of agricultural land.
5. **To recommend** practical legal, administrative and policy measures for balancing agricultural-land protection with legitimate developmental requirements.

4. RESEARCH QUESTIONS & HYPOTHESIS

4.1 Research Questions

Research Question: 1

To what extent does the existing Indian legal framework protect agricultural land from unnecessary conversion and misuse?

Research Question: 2

How effectively does the Tamil Nadu Town and Country Planning Act, 1971 regulate changes in agricultural land use?

¹ P. Leelakrishnan, *Environmental Law in India* (6th ed. 2022).

² Shyam Divan & Armin Rosencranz, *Environmental Law and Policy in India* (2d ed. 2001)

Research Question 3:

How have Indian courts approached unauthorised development and conversion of land contrary to statutory development plans?

Research Question 4:

What legal and administrative reforms are necessary to strengthen protection of agricultural land while allowing sustainable development?

4.2 Research Hypothesis

Hypothesis:

The existing statutory framework provides significant legal protection against unauthorised conversion and misuse of agricultural land, but gaps in enforcement, fragmented regulatory procedures and weak monitoring reduce its practical effectiveness; therefore, stronger integrated land-use governance and judicially enforceable safeguards are necessary.³

5. Research methodology & scope

This research adopts a qualitative doctrinal legal research methodology. The study primarily examines legal rules, statutory provisions, judicial decisions and policy documents rather than conducting field-based empirical research.

Primary Sources

The primary sources include:

- Constitution of India, 1950;
- Tamil Nadu Town and Country Planning Act, 1971;
- Tamil Nadu Combined Development and Building Rules, 2019;
- Tamil Nadu Protection of Tanks and Eviction of Encroachment Act, 2007;
- Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013;
- Environment (Protection) Act, 1986;
- Environment Impact Assessment Notification, 2006;
- relevant judicial decisions of the Supreme Court of India and High Courts.

The 2013 Land Acquisition Act contains a specific provision under Section 10 concerning safeguards for food security in the acquisition of agricultural land.

³ Kailash Thakur, *Environmental Protection: Law and Policy in India* (2d ed. 2007).

Secondary Sources

Secondary sources include:

- scholarly journal articles;
- legal commentaries;
- government reports;
- NITI Aayog publications;
- academic research on agricultural land-use change;
- online legal databases and official judicial materials.

NITI Aayog's work on land resources emphasises the importance of efficient land allocation, secure property rights, digitised land records and consistent land-use regulation.

Scope

The research primarily focuses on India, with particular emphasis on Tamil Nadu. The study examines agricultural land conversion from a legal, environmental, planning and public-interest perspective.

Limitations

The paper is primarily doctrinal and does not undertake a district-wise empirical survey of agricultural land conversion. State-specific procedures also differ, and therefore the Tamil Nadu framework cannot automatically be treated as the law applicable throughout India.

6. REVIEW OF LITERATURE

Existing literature demonstrates that agricultural land conversion is both a legal and socio-economic issue. NITI Aayog's policy work on land resources emphasises the importance of clear land rights, integrated land records and efficient land allocation. It recognises that land markets and land-use regulation are important components of India's economic development. Recent research on Indian land-use changes indicates that agricultural areas are increasingly affected by urbanisation and other forms of land-use transition. Research using satellite and socioeconomic data has examined the dynamics of cropland, fallow land and other land-use changes in India. Studies specifically dealing with agricultural-land conversion have identified the complexity of State-level conversion regimes. Recent comparative research has examined conversion laws across Indian States and highlighted the multiple approvals and regulatory authorities involved in land-use conversion. Legal research concerning State-specific regimes also demonstrates that agricultural-to-non-agricultural conversion normally involves zoning regulations, revenue authorities, planning authorities, environmental restrictions and

procedural requirements. For example, research on Maharashtra identifies the interaction between the Maharashtra Land Revenue Code, 1966 and the Maharashtra Regional and Town Planning Act, 1966.⁴The literature therefore establishes three major perspectives:

1. **Economic perspective:** land conversion may support industrialisation, infrastructure and urban growth.
2. **Agricultural perspective:** excessive conversion may reduce productive agricultural land and create concerns regarding food security.
3. **Environmental and legal perspective:** unregulated land-use change may affect water bodies, groundwater, biodiversity and ecological sustainability.

Literature Gap

Existing literature frequently examines either the economic effects of land conversion or the procedural requirements of individual States. There is comparatively less integrated legal analysis connecting agricultural-land protection, town planning, environmental law, judicial review and the prevention of misuse. This research attempts to bridge that gap by examining agricultural land conversion as a combined land-law, planning-law, environmental-law and constitutional issue, with particular emphasis on Tamil Nadu.⁵

7. SUBSTANTIVE LEGAL ANALYSIS & DISCUSSION

7.1 Constitutional Framework for Protection of Agricultural Land

The Constitution does not expressly create an independent fundamental right to agricultural land. However, several constitutional provisions indirectly support its protection.

Article 21 – Right to Life and Environment

The Supreme Court has developed Article 21 to include the right to live in a clean and healthy environment. Environmental degradation caused by uncontrolled development can therefore raise constitutional concerns.⁶

Article 48A – Protection of Environment

Article 48A directs the State to protect and improve the environment and safeguard forests and wildlife.

Agricultural land is closely connected with environmental sustainability because it supports soil, water, vegetation and ecological functions.

⁴ Gurdeep Singh, *Environmental Law in India* (2d ed. 2016).

⁵ S.C. Shastri, *Environmental Law* (7th ed. 2022).

⁶ M.P. Jain, *Indian Constitutional Law* (9th ed. 2023).

Article 51A(g)

Article 51A(g) requires citizens to protect and improve the natural environment, including forests, lakes, rivers and wildlife.⁷

Article 300A – Right to Property

Article 300A provides that no person shall be deprived of property except by authority of law. While ownership does not create an absolute right to use land in any manner, any governmental interference with property must have legal authority. The constitutional framework therefore requires a balance between individual property rights, agricultural interests, environmental protection and planned development.

7.2 Tamil Nadu Town and Country Planning Act, 1971

The Tamil Nadu Town and Country Planning Act, 1971 is one of the most important statutory mechanisms for regulating land use in Tamil Nadu.

Section 47 – Conformity with Development Plan

Section 47 provides that after a development plan comes into operation, land shall not be used or developed contrary to that plan, subject to the statutory exceptions. This provision is important because agricultural land may be classified within a particular land-use zone. A landowner cannot simply assume that ownership automatically gives an unrestricted right to change its use.⁸

Section 47-A – Development Outside Planning Areas

Section 47-A applies to development in areas outside planning areas. It requires an application to the local authority and prior concurrence of the Director. In the case of wet lands, prior concurrence of the District Collector is specifically required. This is particularly significant for agricultural land because wet lands may have greater agricultural and ecological importance.

Section 48 – Restrictions on Development

Section 48 regulates construction, development and material changes in land use within the relevant planning framework.

Section 49 – Application for Permission

Section 49 requires persons intending to undertake specified development to apply to the appropriate planning authority. The authority must consider matters including:

- the purpose of the proposed development;
- suitability of the location;

⁷ V.N. Shukla, *Constitution of India* (14th ed. 2022).

⁸ S. Shanthakumar, *Introduction to Environmental Law* (2d ed. 2019).

- future development and maintenance of the planning area.

This provision demonstrates that land-use permission is not merely a technical formality. The authority is required to consider the wider planning consequences.⁹

Sections 56 and 57 – Unauthorised Development

The Act provides mechanisms for removal and discontinuance of unauthorised development and for stopping development that is being carried out unlawfully. These provisions are important safeguards against illegal construction and misuse. The enforcement provisions allow authorities to require demolition or alteration, discontinue unlawful use and take steps for restoration of land in appropriate circumstances.

7.3 Tamil Nadu Combined Development and Building Rules, 2019

The Tamil Nadu Combined Development and Building Rules, 2019 were notified to regulate town planning, land use and building construction across municipal corporations, municipalities, town panchayats and village panchayats. The Rules are important because agricultural land conversion cannot be viewed separately from building permission and layout approval. For example, even where a person claims ownership of agricultural land, development for residential or commercial purposes may require compliance with planning and building regulations.¹⁰ Therefore:

Ownership of land unrestricted right to change land use.

Land use must be considered together with zoning, planning permission, environmental requirements and other applicable laws.

7.4 Tamil Nadu Change of Land Use Rules, 2017

Tamil Nadu has also adopted rules dealing with change of land use from agriculture to non-agriculture in non-planning areas. The regulatory approach seeks to prevent individuals from independently changing the character of agricultural land without governmental scrutiny. Recent proceedings before the Madras High Court demonstrate that applications under the 2017 Rules can involve questions relating to Panchayat procedures, concurrence of authorities and the interaction between the Rules and Section 47-A of the Tamil Nadu Town and Country Planning Act. This demonstrates that land conversion is a regulated legal process rather than merely a private transaction between the landowner and purchaser.

⁹ D.D. Basu, *Commentary on the Constitution of India* (9th ed. 2013).

¹⁰ H.M. Seervai, *Constitutional Law of India* (4th ed. 1991).

7.5 Environmental Laws and Agricultural Land Protection

Agricultural land may also fall within broader environmental regulation. The Environment (Protection) Act, 1986 provides a framework for protection of the environment and enables regulation of activities that may adversely affect environmental quality. The Environmental Impact Assessment Notification, 2006 establishes prior environmental-clearance requirements for specified categories of projects. The Supreme Court has emphasised that environmental clearance is preventive in nature and must operate before irreversible development impacts occur. The Tamil Nadu Protection of Tanks and Eviction of Encroachment Act, 2007 is also important because agricultural productivity is closely connected with irrigation tanks and water systems. The Act specifically provides measures for checking encroachments in tanks under the control and management of the Public Works Department. Therefore, agricultural-land protection must include protection of associated water bodies, channels and ecological resources.¹¹

7.6 Land Acquisition and Food Security

Conversion of agricultural land may occur through private development as well as compulsory acquisition. The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 contains a specific statutory provision concerning food security. Section 10 is titled “Special provision to safeguard food security.” This reflects the legislative recognition that agricultural land has importance beyond its market value. Compensation alone may not fully address the social consequences of losing productive agricultural land. Therefore, land acquisition policy must consider food security, livelihood and the long-term consequences of removing agricultural land from cultivation.¹²

7.7 Need for Regulation of Conversion

Agricultural-land conversion should not be absolutely prohibited because economic development requires land for:

- housing;
- roads;
- industries;
- public institutions;

¹¹ P.B. Sahasranaman, *Handbook of Environmental Law* (2d ed. 2012).

¹² Aruna Venkat, *Environmental Law and Policy* (PHI Learning 2011).

- infrastructure;
- schools and hospitals.

However, conversion should satisfy the principles of:

1. **Legality** – conversion must have statutory authority.
2. **Planned development** – it must conform to the applicable development plan.
3. **Environmental sustainability** – environmentally sensitive land must receive stronger protection.
4. **Public interest** – authorities must consider community interests.
5. **Food security** – highly productive agricultural land should not be unnecessarily converted.
6. **Transparency** – the decision-making process should be open and reasoned.
7. **Accountability** – illegal conversion and unauthorised construction should attract effective consequences.

7.8 Comparative Legal Perspective

Agricultural-land conversion laws vary substantially among Indian States.

For example, Karnataka historically regulates agricultural-to-non-agricultural conversion through the Karnataka Land Revenue Act, 1964, including Section 95. Maharashtra uses the Maharashtra Land Revenue Code, 1966 together with town-planning legislation.

This demonstrates that India follows a decentralised regulatory approach.

The advantage of State-specific regulation is that States can respond to local agricultural, environmental and urban-planning conditions.

However, the disadvantage is inconsistency. Different States may impose different conversion fees, procedures, authorities and restrictions.¹³

A better approach would be to retain State flexibility while developing common national principles relating to:

- protection of prime agricultural land;
- protection of multi-cropped land;
- protection of wetlands and irrigation systems;
- transparency in conversion;
- public participation;

¹³ Philippe Cullet & Sujith Koonan eds., *Water Law in India: An Introduction to Legal Instruments* (2d ed. 2017).

- environmental assessment;
- digital monitoring.

8. CASE LAW ANALYSIS & JUDICIAL TRENDS

Case 1: *K. Ramadas Shenoy v. Town Municipal Council, Udipi*, (1974) 2 SCC 506

Material Facts

The case concerned development inconsistent with the applicable planning scheme.

Core Issue

Whether planning authorities could permit land use contrary to the statutory planning framework.

Ratio Decidendi

The Supreme Court recognised the importance of statutory planning controls and held that development must comply with the applicable planning scheme.

Critical Commentary

The case establishes an important principle for agricultural-land protection: development plans cannot be treated as merely advisory documents. If a planning scheme reserves land for a particular use, administrative authorities cannot casually disregard it.¹⁴

Case 2: *Bangalore Medical Trust v. B.S. Muddappa*, (1991) 4 SCC 54

Material Facts

The dispute involved the conversion of land reserved for a public park for another purpose.

Core Issue

Whether reserved land could be converted through arbitrary administrative action.

Ratio Decidendi

The Supreme Court emphasised that planning authorities must act according to statutory powers and cannot arbitrarily alter a development scheme.

Critical Commentary

Although the case concerned a public park rather than agricultural land, its principle is highly relevant. Land-use classifications serve public purposes and cannot be altered merely because another use appears economically attractive.

The Supreme Court's 2026 judgment again relied upon *Bangalore Medical Trust* while

¹⁴ *K. Ramadas Shenoy v. Town Mun. Council, Udipi*, (1974) 2 SCC 506, 509–11 (India).

explaining the binding nature of statutory planning schemes.¹⁵

Case 3: *Friends Colony Development Committee v. State of Orissa*, (2004) 8 SCC 733

Material Facts

The case concerned unauthorised construction and the importance of planned urban development.

Core Issue

Whether unauthorised construction could be treated lightly by authorities.

Ratio Decidendi

The Supreme Court stressed the importance of planning regulations and held that unauthorised constructions should not be encouraged through excessive regularisation.

Critical Commentary

The principle is directly relevant to agricultural land because unauthorised layouts and buildings frequently begin the process of converting agricultural land into urban use without following the statutory procedure.¹⁶

Case 4: *Esha Ekta Apartments Co-operative Housing Society Ltd. v. Municipal Corporation of Mumbai*, (2013) 5 SCC 357

The Supreme Court examined the consequences of unauthorised construction and emphasised the importance of planned development and compliance with building regulations.

Legal Significance

The judgment reinforces the proposition that construction permissions and planning regulations are designed to protect larger public interests and not merely private property interests.¹⁷

Case 5: *Hanuman Laxman Aroskar v. Union of India*, (2019) 15 SCC 401

Legal Issue

The case concerned environmental decision-making and environmental clearance.

Ratio Decidendi

The Supreme Court developed the concept of **environmental rule of law**, emphasising fair, transparent, accountable and participatory environmental decision-making.

¹⁵ *Bangalore Med. Tr. v. B.S. Muddappa*, (1991) 4 SCC 54, 57–60 (India).

¹⁶ *Friends Colony Development Committee v. State of Orissa*, (2004) 8 SCC 733

¹⁷ *Esha Ekta Apartments Co-operative Housing Society Ltd. v. Municipal Corp. of Mumbai*, (2013) 5 SCC 357.

Critical Commentary

The principle is important for agricultural land because conversion decisions may have consequences for water, soil, biodiversity and surrounding communities. Environmental assessment should therefore be substantive rather than merely procedural.¹⁸

Case 6: *Harbinder Singh Sekhon v. State of Punjab*, 2026 INSC 159

Material Facts

A group of agriculturists challenged the Change of Land Use granted for a cement-related industrial unit on approximately 47.82 acres. The land fell within a rural agricultural zone under the notified Sangrur Master Plan.

Core Issues

The Supreme Court considered:

1. Whether Change of Land Use could be granted when the Master Plan classified the site as an agricultural zone;
2. Whether subsequent administrative approval could cure the original defect;
3. Whether environmental and siting safeguards were satisfied.¹⁹

Ratio Decidendi

The Supreme Court held that a statutory Master Plan is not merely a policy document. It has binding legal force and regulates land use in the public interest. Development contrary to an operative Master Plan is impermissible unless the plan itself is lawfully altered according to the statutory procedure.

The Court further held that a later administrative approval could not retrospectively cure an unlawful Change of Land Use where the original permission lacked statutory authority.

The Court consequently allowed the appeals, set aside the High Court judgment and quashed the Change of Land Use dated 13 December 2021.

Critical Commentary

This is particularly important for the present research. It strengthens the principle that agricultural-zone protection cannot be defeated by ad hoc administrative decisions.

The judgment establishes that:

**Master Plan + Statutory Procedure + Public Participation + Environmental Safeguards
= lawful land-use regulation.**

It also demonstrates that economic development and employment cannot, by themselves,

¹⁸ *Hanuman Laxman Aroskar v. Union of India*, (2019) 15 SCC 401.

¹⁹ *Harbinder Singh Sekhon v. State of Punjab*, 2026 INSC 159.

override statutory land-use restrictions.²⁰

9. SUGGESTIONS & POLICY RECOMMENDATIONS

1. Protection of Prime Agricultural Land

Highly productive, multi-cropped and irrigated agricultural land should receive enhanced legal protection. Conversion should be permitted only where there is a demonstrated public or developmental necessity.

2. Integrated Land-Use Authority

Revenue, planning, agriculture, environment, registration and local-government authorities should be connected through an integrated institutional mechanism.

3. Digital Land-Use Monitoring

Government should develop GIS-based digital land records showing:

- agricultural land;
- wet lands;
- irrigation channels;
- water bodies;
- environmentally sensitive areas;
- approved and prohibited land uses.

This would help identify illegal conversion at an early stage.

4. Strict Regulation of Unauthorised Layouts

Unauthorised layouts on agricultural land should not be routinely regularised. Regularisation should remain exceptional and should not create an incentive for future violations.

5. Protection of Wet Lands and Irrigation Systems

Wet lands, tanks, channels and irrigation structures should be protected from conversion, dumping and encroachment.

Section 47-A of the Tamil Nadu Town and Country Planning Act already recognises the special importance of wet lands by requiring prior concurrence of the District Collector in specified cases.

²⁰ M.P. Jain, *Indian Administrative Law* (LexisNexis, 9th ed. 2021).

6. Public Participation

Major changes in land-use plans should involve meaningful public notice and opportunity for objections. The Supreme Court's 2026 decision strongly reinforces the importance of transparency and participation in statutory Master Plan changes.

7. Environmental Assessment

Where proposed conversion may significantly affect water, soil, ecology or surrounding communities, environmental assessment should be conducted before irreversible development begins.

8. Stronger Penalties

Unauthorised conversion and construction should attract effective penalties proportionate to the environmental and social harm caused.

9. Restoration of Illegally Converted Land

Where legally permissible, authorities should have the power and resources to restore illegally converted agricultural land to its original agricultural condition.

10. Agricultural Land Conversion Register

Each district should maintain a publicly accessible digital register containing details of:

- applications;
- approvals;
- rejected applications;
- conditions imposed;
- violations;
- enforcement actions.

11. Protection of Food Security

Before permitting large-scale conversion, authorities should assess its impact on local agricultural production and food security.

12. Periodic Review of Land-Use Plans

Master Plans and development plans should be periodically reviewed using updated

agricultural, environmental and demographic data rather than being altered through isolated administrative decisions.

10. CONCLUSION

Agricultural land is an important component of India's food security, rural economy and ecological sustainability. The conversion of agricultural land is not inherently unlawful because legitimate development requires land for housing, infrastructure, industries and public facilities. However, conversion must occur within the framework established by law. The legal analysis demonstrates that India possesses multiple mechanisms for controlling agricultural-land conversion. Constitutional environmental principles, land-acquisition safeguards, environmental legislation and State town-planning laws collectively provide a regulatory framework. In Tamil Nadu, the Tamil Nadu Town and Country Planning Act, 1971 is particularly significant. Sections 47 and 47-A regulate conformity with development plans and development outside planning areas, while Sections 48 and 49 regulate development permissions. Sections 56 and 57 provide enforcement mechanisms against unauthorised development. The Tamil Nadu Combined Development and Building Rules, 2019 further strengthen the planning and building-control framework. Judicial decisions demonstrate that land-use regulations are intended to protect public interests rather than merely regulate private construction. The decisions in *K. Ramadas Shenoy, Bangalore Medical Trust, Friends Colony Development Committee, Esha Ekta Apartments and Hanuman Laxman Aroskar* collectively emphasise planned development, statutory compliance, environmental protection and accountability. The 2026 Supreme Court judgment in *Harbinder Singh Sekhon v. State of Punjab* provides a particularly significant contemporary development. The Court made clear that a statutory Master Plan has binding legal force and that land use contrary to the operative plan cannot be legitimised through informal or subsequent administrative approval. The hypothesis of this research is therefore substantially established. The existing law provides meaningful protection, but practical effectiveness depends upon enforcement. Fragmented authorities, procedural delays, unauthorised development and inadequate monitoring continue to create challenges. The future legal approach should therefore focus on planned development, agricultural-land conservation, transparent conversion procedures, digital monitoring, environmental safeguards, public participation and strong enforcement. Sustainable development should not mean choosing between agriculture and development; rather, it should mean allowing development in a manner that protects productive agricultural resources for present and future generations.

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