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Rasesh Kanakia  
Parag Munot

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Lakshman Bhagtlani

**JOINT TREASURER**  
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Domnic Romell

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Shyamal Mody  
Nikunj Sanghavi  
Digant Parekh  
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Late Lalit Gandhi  
Late Babubhai Majethia

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Ajay Ashar

**PRESIDENT, KALYAN-DOMBIVLI**  
Praful Shah

**PRESIDENT, MIRA VIRAR CITY**  
Ashit Shah

**PRESIDENT, RAIGAD**  
Vilas Kothari

**PRESIDENT, NAVI MUMBAI**  
Prakash Baviskar

Ref. No. : MCHI/PRES/17-18/018

September 27, 2017

To,  
Hon'ble Shri Devendra Fadnavis  
Chief Minister  
Government of Maharashtra,  
Mantralaya,  
Mumbai 400 032

मुख्यमंत्री सचिवालय  
महाराष्ट्र शासन  
मंत्रालय, मुंबई ४०० ०३२  
दिनांक २८/०९/१७

Subject : Request to finalise Draft Coastal Zone Management Plans (CZMP) for  
Mumbai City, Mumbai Suburb & Raigad District in MMR Area.

Respected Sir,


With due respect to you, CREDAI-MCHI would like to inform you that the chamber have already submitted the suggestion/ objections for the DRAFT CZMP Plans for Mumbai City, Mumbai Suburb & Raigad District in MMR Area.

Accordingly, we have been following up for this issue at Environment Department and have come to know that hearing process is currently going on. Reportedly informed that, it will take minimum 3 months to finalise this plan after passing through various technical scrutiny levels.


Therefore, CREDAI-MCHI would like to request you to please instruct the concerned officials to expedite this process at the earliest to get the benefit for Real Estate Developers to hand over the dream home to the common man.

Thanking you.

Yours faithfully,  
For CREDAI-MCHI

  
**Mayur Shah**  
President

  
**Domnic Romell**  
Hon. Secretary

  
**S. S. Hussain, I.A.S. (Retd.)**  
Chief Executive Officer

CC :

To,  
**Shri Rajesh Narvekar (I.A.S.)**  
Joint Secretary to Chief Minister  
Chief Minister Office  
Government of Maharashtra,  
Mantralaya, Mumbai

Encl. : Letter dated May 11, 2017 - Ref. No. MCHI/PRES/16-17/135

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Dharmesh Jain

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Vyomesh Shah

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Harish Patel

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Nainesh Shah

**HON. TREASURER**  
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**PRESIDENT, THANE**  
Ajay Ashar

**PRESIDENT, KALYAN-DOMBIVLI**  
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**PRESIDENT, MIRA VIRAR CITY**  
Ashit Shah

**PRESIDENT, RAIGAD**  
Vilas Kothari

**PRESIDENT, NAVI MUMBAI**  
Prakash Baviskar

Ref. No. MCHI/PRES/16-17/135

May 11, 2017

To,

1) **Shri Ajoy Mehta (I.A.S.)**  
Municipal Commissioner,  
Municipal Commissioner of Greater Mumbai  
Mumbai - 400 001

2) **Dr. Anbalagan P. (I.A.S.)**  
Member Secretary,  
Maharashtra Pollution Control Board,  
Kalptaru Point, 3rd Floor, Opp.Cine Planet,  
Sion (E), Mumbai - 400022.

3) **Shri Deependra Singh Kushwah (I.A.S.)**  
District Collector,  
Mumbai Sub-Urban District,  
Bandra, Mumbai - 400 051

4) **Shri Banshi Gavali**  
District Collector (Additional Charge)  
Mumbai City Collectorate,  
Old Custom House,  
Fort, Mumbai - 400001

**Sub: Proposed Draft Coastal Zone Management Plans (CZMP) of Mumbai Submission" of the "Objections / Suggestions" on Draft Coastal Zone Management Plan (CZMP) of Mumbai.**

**Ref: Additional Chief Secretary, Environment Department, Government of Maharashtra & Chairman, MCZMA's Notice dated 29-03-2017.**

Respected Sir,

May we invite your kind attention to the above referred Notice dated 25-03-2017 issued by the Additional Chief Secretary Environment Department, Government of Maharashtra and published on the website of MCZMA, Government of Maharashtra & MPCB under Annexure - I, Para IV (a) of CRZ Notification 2011 of the Environment (Protection) Act, 1986 inviting Suggestion / Objections relating to the Proposed Draft Coastal Zone Management Plan (CZMP) of Mumbai.

In response to above referred Notice, CREDAI-MCHI is submitting as under:-

The Draft CZMP's of Greater Mumbai provides for the various Reservations, Land Uses, H.T.L. & Buffer Zones etc. on various lands for which layout of buildings has been approved by the Planning Authority viz. MCGM.

Reservations, Land Uses, H.T.L. & Buffer Zones etc. shown on various lands are as under:-

- A) CRZ on the Landward side of the Existing Roads on CZMP.
- B) 100 Meter wide Buffer (Bay / Creek) CRZ - II (Urban) on CZMP.
- C) 100 Meter wide Buffer (Bay / Creek) CRZ - III (Open Space Area / Rural) on CZMP.
- D) Tributaries i.e. water inlets shown as Water Body (Creeks) CRZ - IV B.
- E) Water body shown as Sea near the Haji Ali Tomb, it' H.T.L. and 500 Meter wide Buffer (Bay / Creek) CRZ - III (Open Space area / Rural).

a) **The CRZ is proposed on the Landward sides of the Existing Roads** all over the Mumbai. Mumbai Metropolitan City is already developed over the centuries. Please consider as how CRZ on the landward side of the existing roads is in any way affecting the environment? Entire South Mumbai i.e. Nariman Point, Ballard Estate, Sewri, Colaba, Neapean Sea Road, Bhulabhai Desai Road, Worli are developed and are not affecting the environment including the Redevelopment of these areas. There are large numbers of buildings along the Coast Line which are generally affected being near the sea and are deteriorating and require to undergo redevelopment. To make the Redevelopment economically viable it is necessary to allow TDR & additional F.S.I. as per D.P. - 2034 as is in the case of non CRZ redevelopments in the city on the Landward side of the Existing Roads. Further even slums in CRZ is allowed to be redeveloped along with 4.00 F.S.I. Therefore why should there be any restriction for normal development as per D.P. 2034, considering if the Land is already reclaimed on the Landward side of an Existing Road then how is the construction on the Landward side in any way affecting C.R.Z.

b) **Creek Buffer Zone is proposed 100 mtr. wide** on the various locations of the approved layouts. As per earlier sanctioned CRZ Survey Plan of Greater Mumbai on the basis of INS Nirdeshank's Report of Survey No. 738/7 dated 26<sup>th</sup> May 1998, the Buffer Zones was **50 Meter wide** from Creek / Bay then and as per that many layouts and Building Plans were approved and buildings are constructed all over the Greater Mumbai. The entire layouts i.e. internal roads, R.G.'s drains etc. is completed on sites. The Buffer Zone is now proposed at 100 mtr. on the Approved existing buildings, Infrastructure, Compound Walls, Gates and Parking Areas, this will also affect the essential services coming in the proposed 100 meter wide Buffer Zone of CRZ - II (Urban) and of CRZ - III (Open Space Area / Rural) thereby affecting the health of the residents of this metropolitan city. With this Buffer Zone there will be imbalance of FSI.

c) **Tributaries and Nallah** - There are many water inlets shown as a Water Body (Creek) CRZ - IV B shown wrongly. They are actually a very small

Nalla's/Tributaries/Effluents that flow into creeks. All these water bodies are not creeks.

d) **Bay** - Water body near the Haji Ali Tomb, shown as Sea. From the CZMP map itself it can be seen that it is a Bay and not Sea. This Haji Ali Bay is much smaller than the Mahim Bay & the Back Bay. The area of Mahim bay is approximately 06.68 Sq.Km. & it's buffer zone proposed is 100 meter wide, the area of Back Bay is approximately 10.75 Sq.Km. & it's buffer zone is also proposed 100 meter whereas the area of Haji Ali Bay is approximately only 00.40 Sq.Km. and it's buffer zone is proposed 500 meter wide. This is contrary and shown wrongly, arbitrarily.

e) **Open Spaces & CRZ I** - Nallahs entering into the creek are carrying waste water from the city into the creek. These are wrongly being shown as part of the creek.

f) Many encroached spaces which are largely occupied by huts and encroachments are shown as open spaces in the CRZ map and classified as Category I. This is done based on the proposed reservation shown on DP Plan of Mumbai. CRZ map has to reflect the real structures and ground reality and all land which are occupied by structures, huts etc, even if they are shown reserved on DP plan, should not be marked as open spaces or categorized as category I but should be marked as Category II and should be shown as already Developed Property.

All these proposals on CZMP Map are shown wrongly which is unfair & unwarranted.

Therefore, we have strong objection for the same.

Therefore, without prejudice to our contention it is suggested that,

- i) Delete the CRZ proposed on the Landward side of the Existing Roads all over Mumbai Metropolitan City.
- ii) Creek Buffer Zone of 100 mtr. wide CRZ - II (Urban) on private lands which was earlier 50 Meter wide as per earlier sanctioned CRZ Survey Map of Greater Mumbai now should be curtailed to less than 50 Meter which we suggest to 25 meter wide Buffer Zone on the plan of CZMP of Mumbai.
- iii) To delete all Tributaries and Nallahs i.e. water inlets & Nallahs - CRZ - IV B as the same are actually very small Nallas / Tributaries / Effluents that flows into a creeks having very small widths shown on the plan attached herewith marked as "PLAN - A" and,

- iv) Bay - Water body shown near the Haji Ali Tomb as "Sea" to be qualified as "Bay" and it's 500 Meter wide Buffer Zone to be curtailed to 50 Meter wide Buffer Zone similar to Mahim Bay & Back Bay.
- v) Open Spaces in CRZ I - should be shown as CRZ II as they have structures of them.


It is requested to kindly take into consideration the above view points and Suggestions / Objections on your record.


We would like you to kindly issue suitable instructions & modifications to the concerned officials to address / examine the apprehensions and objections / suggestions while framing and before submitting the proposal to the final sanction to the Draft CZMP of Mumbai.


We desire personal hearing in the matter and are awaiting your further communications in this regards.

Thanking you,

Yours faithfully,  
For CREDAI-MCHI

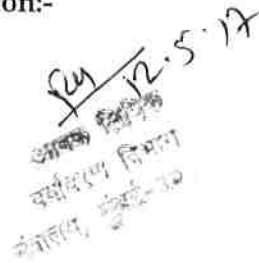
  
Dharmesh Jain  
President

  
Nainesh Shah  
Hon. Secretary

  
S. S. Hussain I.A.S (Retd.)  
Chief Executive Officer

Copy for information & necessary action:-

Shri Satish Gavai (I.A.S.)  
Additional Chief Secretary,  
Environment Department and  
Chairman, MCZMA,  
Government of Maharashtra,  
Mantralaya, Mumbai - 400 032.

  
12.5.17  
आवक दिनांक  
पर्यावरण विभाग  
मंत्रालय, मुंबई-४००-३०२

Encl: i) Plan - 'A'.

## मुंबई शहर व उपनगर, रायगड व रत्नागिरी जिल्हांचे प्रारूप किनारा क्षेत्र व्यवस्थापन आराखड्यांवर (CZMPs) सुचना व हरकती मागविणेबाबत

केंद्रिय पर्यावरण, वने व वातावरणीय बदल मंत्रालय, नवी दिल्ली यांनी दि. ६.१.२०११ रोजी प्रसिद्ध केलेल्या सिआरझेड अधिसूचना, २०११ मधिल तरतूदीनुसार राज्यातील तटीय जिल्ह्यांकरीता नवीन सागरी किनारा क्षेत्र व्यवस्थापन आराखडे (CZMPs) बनविणे अपेक्षित होते. त्याअनुषंगाने, मुंबई, रायगड व रत्नागिरी या जिल्ह्यांचे नकाशे बनविण्याचे काम इन्स्टीटयुट ऑफ रिमोट सेन्सींग, अण्णा युनिव्हर्सिटी, (IRS) चेन्नई, तसेच ठाणे व सिंधुदुर्ग या दोन जिल्ह्यांसाठी नकाशे बनविण्याचे काम सेस, (CESS) केरळ या केंद्र शासन प्राधिकृत संस्थांना सोपविण्यात आले होते.

त्याअनुषंगाने, मुंबई शहर व उपनगर, रायगड व रत्नागिरी जिल्हांचे प्रारूप किनारा क्षेत्र व्यवस्थापन आराखडे (CZMPs) बनविण्याचे काम इन्स्टीटयुट ऑफ रिमोट सेन्सींग, चेन्नई यांचे मार्फत पूर्ण झाले असून सदर आराखडे (CZMPs) सिआरझेड अधिसूचना, २०११ मधिल परिशिष्ट १, परिच्छेद IV, (अ) तरतूदीनुसार, जनतेच्या सुचना व हरकतीसाठी पर्यावरण (संरक्षण) कायदा, १९८६ मधिल तरतूदीअन्वये प्रसिद्ध करण्यात येत आहेत.

सर्व संबंधितांना विनंती करण्यात येते की, सदर आराखड्यांवर काही सुचना व हरकती असल्यास, त्या प्रारूप किनारा क्षेत्र व्यवस्थापन आराखडे (CZMPs) प्रसिद्ध झाल्या पासून ४५ दिवसांच्या आत संबंधित जिल्हाधिकारी, संबंधित प्रादेशिक अधिकारी, महाराष्ट्र प्रदूषण नियंत्रण मंडळ व संबंधित स्थानिक नियोजन प्राधिकरण यांचेकडे इंग्रजी / मराठीत लेखी स्वरूपात कृपया सादर कराव्यात. सदर प्रारूप किनारा क्षेत्र व्यवस्थापन आराखडे (CZMPs) खालील संकेतस्थळांवर उपलब्ध आहेत.

- १) महाराष्ट्र सागर तटीय क्षेत्र व्यवस्थापन प्राधिकरण- <https://mczma.maharashtra.gov.in/>
- २) पर्यावरण माहिती प्रणाली केंद्र (एनव्हीस) - <http://mahenvis.nic.in/Default.aspx>,
- ३) महाराष्ट्र शासन - <https://www.maharashtra.gov.in/>
- ४) महाराष्ट्र प्रदूषण नियंत्रण मंडळ - <http://mpcb.gov.in/>

तसेच, हे आराखडे संबंधित जिल्हाधिकारी, संबंधित प्रादेशिक कार्यालय व मुख्यकार्यालय, महाराष्ट्र प्रदूषण नियंत्रण मंडळ व संबंधित स्थानिक नियोजन प्राधिकरण यांचेकडे देखील उपलब्ध आहेत.

दि. २९.०३.२०१७

ठिकाण: मुंबई

स्वाक्षरी/-

(सतिश गवई)

अपर मुख्य सचिव, पर्यावरण

तथा अध्यक्ष, एमसीझेडएमए

**Invitation for suggestions and objections on draft Coastal Zone Management Plans (CZMPs) of Mumbai City, Mumbai Suburban, Raigad and Ratnagiri Districts**

As per the provisions of the CRZ Notification, 2011 published by the Ministry of Environment, Forest and Climate Change, New Delhi, the State Government is entrusted with the responsibility of preparation of Coastal Zone Management Plans of the coastal areas of the State through agencies authorized by the MoEF&CC, New Delhi. Accordingly, work of preparation of draft CZMPs of the Mumbai City, Mumbai Suburban, Raigad and Ratnagiri Districts was given to Institute of Remote Sensing (IRS), Chennai and for Thane and Sindhurug districts, the work was allotted to Centre for Earth Science and Studies (CESS), Kerala.

IRS, Chennai has completed the work of preparation of draft CZMPs of the Mumbai City, Mumbai Suburban, Raigad and Ratnagiri districts. Therefore, as per annexure I, para IV (a) of CRZ Notification, 2011, the said draft CZMPs are hereby published on the Website of MCZMA (<https://mczma.maharashtra.gov.in/>), ENVIS (<http://mahenvis.nic.in/Default.aspx>), Govt. of Maharashtra (<https://www.maharashtra.gov.in/> ) and Maharashtra Pollution Control Board (<http://mpcb.gov.in/> ) for inviting suggestions/ objections of all stakeholders as per the Environment (Protection) Act, 1986.

All stakeholders are requested to submit suggestions/ objections if any in writing in English / Marathi to concerned District Collector, concerned Regional Officer, MPCB, concerned local Planning Authority on the said draft CZMPs within 45 days from the date of publication of these draft CZMPs.

Further, these draft CZMPs are also available for public with concerned District Collectors, Local Planning Authorities, MPCB Headquarter & concerned Regional offices of MPCB.

Date: 29.03.2017  
Place: Mumbai

Sd/-  
(Satish Gavai)  
Additional Chief Secretary, Environment  
& Chairman, MCZMA