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Ref. No. MCHI/PRES/17-18/066

November 22, 2017

To,

**Shri Ramdas Kadam**

Minister for Environment

Government of Maharashtra

Mantralaya

Mumbai - 400 021

**Sub: Additional suggestion in Coastal Zone Management Plan (CZMP)**

Respected Sir,

CREDAI-MCHI is an apex body consisting of members from Real Estate Industry among Mumbai Metropolitan Region (MMR). It is the most prominent and the only recognized body of Real Estate Developers in Mumbai and MMR. We bring together members dealing in Real Estate Development on one common platform to address various issues facing the Industry. With a strong Membership of over 1800 leading Developers in Mumbai, CREDAI-MCHI has expanded across MMR, having its own units in the region of Thane, Kalyan-Dombivli, Mira-Virar, Raigad and Navi Mumbai. CREDAI-MCHI is recognized by Government of Maharashtra and the Central Government and helps in meeting their objectives of providing housing, which is a basic necessity.

We would like to draw your kind attention to the following.

1. The Draft Coastal Zone Management Plan (CZMP) for Greater Mumbai was published on 29.03.2017 and stake holders had to submit their suggestions / objections within forty-five days. The draft CZMP has not yet been finalized till date thereby restricting the development of the city where the land is affected by CRZ. Land is at a high premium in Mumbai and land owners are burdened with huge costs like interest etc. It is our earnest request that the CZMP may be finalized and published urgently.
2. The Proposed Coastal road may please be incorporated in the CZMP and its impact on the High Tide Line (HTL) be clearly defined in the CZMP.
3. Further, CRZ Notification, 2011 has carved special dispensation for redevelopment of dilapidated, cessed and SRA buildings in CRZ II area by permitting such projects with incentive additional FSI under prevailing DCR which makes such redevelopment schemes feasible. However, the left over portions of the city in CRZ II have been excluded from the purview of this notification and are thus still governed under DCR 1967, making their redevelopment not feasible. There should be uniformity for redevelopment of all areas falling under CRZ II. It is our earnest request that these portions be brought under the ambit of CRZ notification 2011 and be allowed to be developed as per prevailing DCR.

4. CRZ is proposed on the Landward side of Existing Roads all over Mumbai. Mumbai Metropolitan City is already developed over the last few decades. Entire South Mumbai i.e. Nariman Point, Ballard Estate, Sewri, Colaba, Neapean Sea Road, Bhulabhai Desai Road, Worli are developed. Mumbai is an island city having a coastline of around 49 kms, attracting a 500 meter CRZ restriction along the coast. Further CRZ is also applicable to the coastal water bodies which are tidally influenced such as creeks, rivers, estuaries, bays and nallas. Over and above such regulations, there is mandatory 50 m buffer zone from the Mangroves vegetation which also forms the CRZ area. Mumbai is the country's commercial capital and due to paucity of land and restrictive under CRZ norms, Mumbai is facing unsurmountable challenges to accommodate its population. While CRZ regulations make great ecological sense in rural areas, it is an impediment to cater to basic needs for housing in a city like Mumbai. Public interest involved in the development of housing is far greater. Since most of Mumbai is also developed along the coastline, having CRZ on the landward side of roads is not helping the environment. Less FSI, less population density seems to be the pure logic behind freezing FSI and population density in coastal areas, so that population can be protected from hazards and coastal areas remain uncluttered. However, entire CRZ II belt of Mumbai was built up prior to 1991. We feel that potential for further ecological damage to Mumbai, which has already been developed up to the shoreline, is now very little. Further even slums in CRZ are allowed to be redeveloped with 4.00 F.S.I. Therefore, why should there be any restriction for normal development on the Landward side of an Existing Road ?

Therefore, our request points are as follows

1. The landward side of all roads in Mumbai be kept free of CRZ and be allowed to be developed/ redeveloped as per prevailing DCR of MCGM.
2. All the development in landward side be allowed to be developed as per Development Control Regulations prevailing from time to time.
3. Changes in the HTL as per the Coastal Road & Eastern Freeway.

Kindly consider and do the needful please

Thanking you

Yours faithfully,  
For CREDAI-MCHI



**Mayur Shah**  
President



**Domnic Romell**  
Hon. Secretary



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