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Ref. No. MCHI/PRES/24-25/068

Date: 29/7/2024



To,

Shri Chandrakant Undage

Dy. Chief Engineer, (Development Plan) II &
Member Secretary, HRC
Brihanmumbai Municipal Corporation
Mumbai

**Sub: Revision of policy regarding insisting NOC for High Rise Buildings
by High Rise Committee**

Ref: Your letter Che.E/D.P./07807/WS dated 22.07.2024

Dear Sir,

We would like to take this opportunity to thank you for inviting us to present our suggestions for High Rise Committee scheduled on 31st July 2024 and our delegates shall remain present for the said meeting. As requested, we are submitting our following suggestions and justifications, which we would like to take up for the discussion during the meeting.

It is requested to amend the requirement of the High Rise Committee's recommendation for buildings up to 250 meters in all redevelopment projects under regulation 33 of DCPR 2034. All the redevelopment projects in Mumbai are executed under reg. 33(5), 33(7) A, 33(7) B, 33(9), 33(10), 33(11) and other redevelopment schemes under Reg.33 of DCPR 2034. In order to promote holistic development, it is just to give eligible benefits to all redevelopment projects planned and being executed under all the above regulations.

At present, only structural, geotechnical and CFO parameters are looked after by the technical committee for high rise buildings. We humbly request that all the project redevelopment schemes under Reg. 33 of DCPR 2034 with a height of 250 meters, should be vested to Municipal Commissioner of BMC instead of technical committee for high rise buildings.

We would like to bring to the kind attention that a meeting was held on 12/01/2021, under the Chairmanship of Shri Sanjay Kumar (the then Chief Secretary), wherein it was decided that for the projects under regulation 33(9) of DCPR 2034, requirement of proposal going to the technical committee for high rise buildings has been amended from 120 mtrs. to 250 mtrs. We would also like to highlight that as per the unified DCPR, there is no provision of High Rise Committee's recommendation for buildings up to 250 mtrs. and accordingly corporations like Thane Municipal Corporation are not asking for High Rise Committee's recommendation for buildings up to 250 m. The protocol of seeking the High Rise Committee's recommendation for such buildings is only in practice in the BMC jurisdiction.

CREDAI-MCHI therefore prays that the requirement of all the proposals going to the technical committee for high rise buildings with more than 120 mtrs. height, should be extended up to 250 mtrs. to all redevelopment projects under regulation 33 of DCPR 2034 as the same has already been considered for cluster redevelopment under 33(9) of DCPR 2034.

Maharashtra Chamber of Housing Industry

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BHIWANDI | PALGHAR BOISAR | SHAHAPUR-MURBAD | URAN-DRONAGIRI |
VASAI VIRAR | ALIBAG | KARJAT-KHALAPUR-KHOPOLI | YOUTH NMR

1. Insisting High Rise Committee NOC before issue of Plinth C.C.

- It is suggested that the NOC from High Rise Committee before issue of Plinth CC, need not be made a condition as per policy approved under Ease of Doing Business as it will delay implementation of projects by 6-9 months minimum. Further, as per checklist issued by High Rise Committee, all structural detailing, wind tunnel reports, if required for tower beyond 150 mtrs. or peer review, needs to be submitted in advance, which takes almost 4 to 6 months for preparation.
- Under Ease of Doing Business, BMC has been issuing Zero IOD and CC at the risk of Project proponent to demolish the said work if not approvable by BMC, and High Rise Committee being part of BMC, the same can be easily implemented if any work carried out is not acceptable to High Rise Committee.

However, in order to bring fairness, we have certain suggestions, which can help to overcome issues listed below along with its justification, which needs your kind consideration without any compromise on safety of building.

- The investment in Real Estate project is substantial and every project proponent needs to register its project in MahaRERA and for registration of project requires C.C. for the project. Once RERA registration is done, Developer can start booking flats and then it is possible for developer to raise finance and project will proceed further. All these process is linked together with finance.
- During Various discussions held in the meetings with High Rise Committee, it is understood that main concern is while starting the construction, it is not possible to examine the soil conditions and project cannot be evaluated from GEO TECHNICAL point of view.
- Structural design of a building of height more than 120 mtrs is highly professionally skilled job and it is continuous process and keeps on updating over the execution of project for cost optimizing structure.
- Various other studies including wind tunnel analysis are required to be done, hence it will require more time.
- In order to meet both the ends, we requested to allow High Rise Committee's submission to be done with Architectural plan, geotechnical details and with conceptual structural & MEP details.
- Detailed MEP, structural, wind tunnel report (if required) & concession etc. will be submitted as per current policy with an undertaking to demolish parts not approvable by High Rise Committee or rectification to be carried out as required to be done by project proponent and no case of fact accompli will be accepted.
- Once the application is made with minimum required documents and site visit can be conducted with all the members of Committee before starting construction, so that main point of soil investigation is taken care off and work can be started.
- Please note that at this time detailed structural drawings are not available and hence structural points will not be discussed during site visit and same can be discussed during the presentation.
- **Once site visit by Expert Geotechnical Member is done, commencement certificate can be issued.**
- Within a period of 6 to 9 months, detailed structural analysis, wind tunnel report & concessions report will be available as the said time will be required for the documentation and the presentation by High Rise Committee will be done thereafter and present process of High Rise Committee NOC can be continued.

2. Strict implementation of the condition in case any amendment in the plans after NOC issued by High Rise Committee, revised NOC be insisted.

- If the height of building /configuration of building / building / No. of basements / number of podiums are changed, then in that case revised NOC from High Rise Committee need to be insisted,
- Due to site constraints, minor changes are carried out in the building planning, sometimes, at the insistence of the buyers, internal planning of the tenements is change, it would not be correct to insist on revised approval from High Rise Committee for every revision in plans.
- If the height of building /configuration of building / No. of basements / number of podiums are not changed and only there are other amendments within this configuration, then revised NOC from High Rise Committee need not be insisted. However, the condition of structural proof checking from institute like VJTI / IIT OR from Tall Building Code Committee, appointed by High Rise Committee need to be insisted before granting occupation to the building.

Sir, we look forward to your kind consideration of the above suggestions due to the high cost of realty, RERA implementation timelines on the project, and the policy approved under EODB. An undertaking is given by the PP to demolish portions not approvable, which includes obtaining NOC from the High Rise Committee. Furthermore, it is requested that the structural and geotechnical consultants maintain high safety standards for the design of high-rise buildings.

Looking forward to your kind consideration on the above suggestions.

Thanking you,

Yours sincerely,
For **CREDAI-MCHI**



Domnic Romell
President



Dhaval Ajmera
Hon. Secretary

PS: Contact Person Mr. Sanjay Phope - +91 9619345193