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2023-2025**

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Naman Shah

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WOMEN'S WING CHAIRPERSON
Jesal Shah

CREDAI - MCHI



Ref. No. MCHI/PRES/24-25/078

Date: 19/8/2024

To,
Dr. Bhushan Gagrani (I.A.S.),
Municipal Commissioner,
Brihanmumbai Municipal Corporation,
Fort, Mumbai - 400 001

Subject: Request for an appointment for a meeting to discuss on the issues related to the real estate sector

Respected Sir,

We at CREDAI-MCHI would like to request for an appointment for a meeting at your earliest convenience to discuss on the following issues of concern which need your urgent attention and necessary action on it. Following are the suggestions for your necessary consideration:

1. Advertising from private land:

Real estate developers and private landowners who are facing challenges due to the advertisement tax levied by the BMC on hoardings placed on privately owned land, which are used to advertise the same plot or the proposed project on that very land.

Concerns Regarding the Advertisement Tax:

As you are aware, the current regulations stipulate that all hoardings, banners, and advertisements within the municipal limits, including those on private properties, are subject to an advertisement tax. While we understand the necessity of such a tax for hoardings placed on public land or those advertising commercial interests unrelated to the property on which they stand, we believe that applying the same charges to hoardings that merely advertise the land or the proposed project where they are installed poses an undue burden on real estate developers and landowners.

Challenges Faced:

Increased Project Costs: The imposition of advertisement tax on hoardings that are specifically promoting the same land or project adds unnecessary costs to the project, which could otherwise be utilized to enhance the quality and affordability of the development.

No Use of Public Land: These hoardings are erected on privately owned land and do not encroach upon or utilize public property or BMC resources. As such, they do not contribute to the clutter or commercialization of public spaces, which is often the rationale behind such taxes.

Promotion of Private Property: The purpose of these hoardings is strictly limited to promoting the same land and proposed project, with no intent of advertising any other commercial ventures or products. These are essential tools for real estate developers to effectively market and sell their projects, especially in a competitive market like Mumbai.

Request for Exemption:

In light of the above challenges, we respectfully request the BMC to reconsider the imposition of advertisement tax on hoardings that are used solely to advertise the same land and proposed project on the property where they are placed. We believe that exempting such hoardings from advertisement tax and licensing fees would:

- Reduce unnecessary financial burdens on real estate developers and landowners.
- Encourage the growth of real estate projects by allowing developers to allocate more resources to construction and community development.
- Maintain the integrity of privately owned properties without imposing additional costs for advertising the very same land.

Maharashtra Chamber of Housing Industry

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CREDAI-MCHI CHAPTERS : THANE | KALYAN-DOMBIVLI | MIRA BHAYANDAR | RAIGAD | NAVI MUMBAI |
BHIWANDI | PALGHAR BOISAR | SHAHAPUR-MURBAD | URAN-DRONAGIRI |
VASAI VIRAR | ALIBAG | KARJAT-KHALAPUR-KHOPOLI | YOUTH NMR

2. Streamlining of PCO Charges Process:

We would also like to address the issue of PCO (Provisional Completion Order) charges. Currently, the process of collecting these charges can be cumbersome and time-consuming, involving multiple interactions with ward offices, which can delay the progress of construction projects.

We propose the following improvements to streamline the PCO charges process:

Automatic Collection with First CC:

PCO charges could be automatically levied by the Building Proposal (BP) Department at the time of issuing the first Commencement Certificate (CC), similar to how other premiums are collected. This would simplify the process and ensure that developers are aware of and can plan for these charges from the outset.

Online Process Linked to autoDCR:

The PCO charges should be calculated based on the construction area as determined by the autoDCR system of BMC. Ideally, the charges could be collected over a period of 3 years for buildings up to 70 meters in height and 5 years for buildings up to 120 meters in height and so on.

Ease of Doing Business:

Linking the permission for PCO charges directly to the CC within the autoDCR system, if possible, would significantly improve the ease of doing business. This approach would automate the NOC process, reducing the need for multiple visits to ward offices and making the process more efficient and developer-friendly.

Implementing these suggestions would not only reduce the administrative burden on developers but also align with the Government's objectives of improving the ease of doing business and promoting digital transformation within regulatory processes.

3. Tree Cutting NOC:

There are numerous cases pending for Tree cutting NOC and no communication has been received by the ward offices, and the status of these cases remains unchanged. The cases where there is a hardship in planting trees as per the age of the trees due to space constraints within the plots, the project proponents need to plant trees within the BMC jurisdiction. The alternative is given to plant trees in the SGNP areas. A mechanism can be formed by BMC to monitor such tree plantations. It was also suggested by the BMC officers to collect a sum of Rs. 5000 per tree as a green fund, similar to the practice by Thane Municipal Corporation. Once the land is allotted, the fund can be utilized for conducting the tree plantation. It is also suggested to continue with the earlier regulation of planting trees at site i.e. 2 trees to be planted against one which is cut. It is also proposed that trees planted on podiums, should be considered in the counting of trees, which are required for the project.

We therefore humbly request you to grant us an appointment for a meeting, at your earliest convenience with your goodself and your team to present our above concerns in detail.

Thanking you,

Yours sincerely,
For **CREDAI-MCHI**



Domnic Romell
President



Dhaval Ajmera
Hon. Secretary

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