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



Subject: Urgent Request for Granting IOD & CC up to Plinth Level to Revive Stalled Projects Amid NGT Stay

Respected Sir,

On behalf of **CREDAI-MCHI**, the apex body representing Mumbai's real estate developers, we seek your urgent intervention to address the severe paralysis faced by our member projects due to the ongoing stay order from the Bhopal Bench of the National Green Tribunal (NGT).

Critical Challenges Facing the Industry:

- Complete Work Stoppage:** All construction sites remain idle pending vacation of the NGT stay, causing cascading economic losses.
- Financial Distress:** Promoters cannot secure financing, execute sales, or meet RERA timelines, risking homebuyer trust and project viability.
- BMC Revenue Impact:** Stalled projects directly impede municipal revenue generation, affecting public infrastructure development.

Solution Anchored in EODB Policy:

We propose that BMC permit promoters to apply for **IOD and CC up to Plinth Level** as an interim measure under Section III of the *Ease of Doing Business (EODB) Manual*, which explicitly allows:

"III. Intimation Of Disapproval (IOD) and Commencement Certificate (CC) up to plinth Stage:

1) IOD up to Plinth and CC up to Plinth:

In case of vacant plot or property with vacant structure to be demolished, the Developer/Owner may at his option, apply for IOD up to plinth and CC up to plinth, pending approval of concessions, HRC, MOEF (for construction area up to 20,000 sqmt.) on submission of undertaking as per Form 6 of Section I-E of the manual. Such application can only be made after approval of layout.

The concerned E.E. (BP.) shall issue IOD up to plinth and CC up to plinth for construction area up to 20,000 sqmt. within 7 days of such application and submission of undertaking."

— EODB Manual (Page 11 of 22)

Why This Approach Benefits All Stakeholders:

- For Promoters:** Enables foundational work (piling, plinth construction), retains labor, and maintains project momentum during litigation.
- For BMC:** Generates immediate revenue via approval fees (utilized for public works) and upholds Maharashtra's pro-growth EODB mandate.
- For Homebuyers & Economy:** Safeguards investments and prevents job losses in allied sectors.

Maharashtra Chamber of Housing Industry

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VASAI VIRAR | ALIBAG | KARIAT-KHALAPUR-KHOPOLI | YOUTH NMR

CREDAI-MCHI Appeal:

We urge BMC to operationalize this provision immediately for eligible projects. This will:

- **Align with the State's commitment to "ease of doing business."**
- **Prevent irreversible financial damage to the real estate ecosystem.**
- **Ensure BMC's revenue pipeline remains active amid external delays.**

CREDAI-MCHI stands ready to collaborate with your office for seamless implementation. We request an urgent meeting to discuss modalities.

Thank you for your leadership in supporting Mumbai's growth.

With the highest regard and best wishes,

Yours sincerely,
For CREDAI-MCHI

Domnic Romell
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Hon. Secretary

Keval Valambhia
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