

**PRESIDENT**  
Dornic Romell

**IMMEDIATE PAST PRESIDENT**  
Borman Irani

**PRESIDENT-ELECT**  
Ajay Ashar

**STRATEGIC ADVISOR**  
Abhishek Lodha

**SENIOR VICE PRESIDENTS**  
Parag Shah  
Jayesh Shah  
Sukhraj Nahar  
Sandeep Raheja  
Rasesh Kanakia

**VICE PRESIDENTS**  
Bandish Ajmera  
Shailesh Puranik  
Pritam Chivukula  
Amit Thacker  
Jackbastian Nazareth

**SECRETARY**  
Dhaval Ajmera

**TREASURER**  
Nikunj Sanghavi

**JOINT SECRETARIES**  
Tejas Vyas  
Pratik Patel  
Sunny Bijlani  
Rushi Mehta

**JOINT TREASURER**  
Gurminder Singh Seera

**COMMITTEE MEMBERS**  
Shahid Balwa  
Subodh Runwal  
Parag Munot  
Nainesh Shah  
Mukesh Patel  
Munish Doshi  
Raajesh Prajapati  
Shailesh Sanghvi  
Parth Mehta  
Harmohan Sahni  
Jayvardhan Goenka  
Umang Kuwadia  
Prashant Khandelwal  
Binitha Dalal  
Ayushi Ashar  
Samyag Shah  
Ricardo Romell

**SPECIAL ADVISORS**  
Ar. Hafeez Contractor  
Adv. Parimal Shroff  
Anuj Puri

**STATISTICS AND RESEARCH**  
Dr. Adv. Harshul Savla

**INVITEE MEMBERS**  
Rahul Sagar  
Ramkrishna Raheja  
Nishant Agarwal  
Harsh Hiranandani  
Ajay Nahar  
Azim F. Tapia  
Cherag Ramakrishnan  
Vijay Lakhani  
Jayesh Chauhan  
Aditya Shah  
Shraddha Goradia  
Sudhanshu Agarwal  
Hussain Lalani  
Sahil Parikh  
Aditya Mirchandani  
Rushi Ajmera

**YOUTHWING CONVENOR**  
Naman Shah

**PROCUREMENT CONVENOR**  
Nimish Ajmera

**WOMEN'S WING CHAIRPERSON**  
Jesal Shah

To,  
Smt. Anchal Goyal (I.A.S.)  
Collector, Mumbai City,  
Collectorate and District Magistrate Office,  
Mumbai City, Old Custom House,  
Fort, Mumbai 400 001.



**Subject: Submission of Vision Document for Revenue Administration in Developed**

**Maharashtra 2047**

Reference: Your Office Letter No./२०२५, dated August 5, 2025

**Respected Madam,**

We extend our profound gratitude for the esteemed invitation from your office, dated August 5, 2025, to contribute to the "Developed Maharashtra 2047 Vision Document" for the Revenue Department. Your proactive engagement reflects the government's commitment to inclusive growth and strategic foresight in shaping the state's future.

CREDAI-MCHI, as the apex body representing these vital sectors in the Mumbai Metropolitan Region (MMR), possesses a deep understanding of the ground realities, operational challenges, and immense potential within the urban development landscape. These suggestions are fundamentally geared towards facilitating the realization of the state's ambitious development agenda, particularly aligning with the recently approved "Maharashtra Housing Policy 2025: My House, My Right". This policy articulates a clear vision for ensuring affordable and adequate housing for all citizens, a goal that can only be achieved through a responsive and enabling revenue ecosystem.

### **I. Overarching Principles for a Progressive Revenue Ecosystem**

The transformation of Maharashtra into a developed state by 2047 necessitates a fundamental shift in the approach to revenue administration. A progressive revenue ecosystem must be built upon foundational principles that move beyond addressing isolated grievances to fostering systemic, proactive governance. This strategic perspective positions the Revenue Department not merely as a regulatory body but as a crucial enabler of economic activity and social welfare.

- **Transparency and Predictability:** The establishment of clear, consistent, and easily accessible rules, regulations, and processes across all land and revenue matters is paramount. Ambiguity in procedures and discretionary interpretations by officials have historically led to delays and uncertainty, as evidenced by past challenges with Non-Agricultural (NA) permissions where, despite simplification ordinances, the "situation is not yet improved" and "confusion & delays are avoided". By minimizing such ambiguities, a predictable environment for investment and development can be fostered, encouraging greater participation and confidence from the real estate sector.
- **Digital Transformation and Automation:** A comprehensive digital overhaul of revenue services is essential for achieving true "Ease of Doing Business." This involves leveraging technology to automate processes, minimize human intervention, and expedite approvals. Enhanced data accuracy and accessibility through integrated digital platforms will streamline operations, reduce errors, and provide real-time information to all stakeholders. This digital shift is a critical step towards modernizing land administration and making it more responsive to contemporary demands.

### **Maharashtra Chamber of Housing Industry**

Maker Bhavan II, 4<sup>th</sup> Floor, 18, V. Thackersey Marg, New Marine Lines, Mumbai - 400 020.  
Tel: 42121421, Fax: 4212 1411/407 Email: secretariat@mchi.net Website: [www.mchi.net](http://www.mchi.net)

- **Efficiency and Time-Bound Approvals:** Establishing and strictly adhering to specific, short timelines for the delivery of all revenue-related services and approvals is critical. Delays in obtaining necessary clearances directly impact project execution timelines, leading to increased holding costs for developers and, consequently, higher housing prices for citizens. Mandating and enforcing time-bound processes will introduce much-needed predictability and efficiency into the development cycle.
- **Stakeholder-Centric Approach:** Continuous, structured dialogue and collaborative engagement with all stakeholders, including industry bodies, citizens, and other government departments, are vital. This ensures that policies are practical, responsive, and effectively address ground-level challenges. Past communications from CREDAI-MCHI regarding persistent issues with NA permissions and royalty payments [1, 1, 1] highlight the importance of such ongoing consultation to bridge policy intent with practical implementation.
- **Equity and Fairness:** Policies must be formulated to be inherently equitable, avoiding disproportionate financial or procedural burdens on specific segments of the industry or on long-standing landholders. This is crucial for fostering trust and ensuring inclusive development across the state. An equitable framework ensures that reforms benefit all participants in the real estate ecosystem, from large developers to individual landowners.

## **II. Immediate Horizon: Streamlining Operations (2025-2029)**

To achieve the ambitious goals of "Developed Maharashtra 2047," immediate and decisive action is required to streamline core revenue operations. These foundational improvements will lay the groundwork for more complex policy reforms in the medium and long term.

### **A. Expediting Non-Agricultural (NA) Permissions in Urban Areas**

Despite the Maharashtra Government's ordinance of January 5, 2017, which aimed to scrap prior Collector permission for NA use in Development Plan (DP) areas and simplify procedures outside DP areas, the ground reality has unfortunately not improved significantly. As highlighted by CREDAI-MCHI in 2017, "confusion & delays are avoided to fulfilling government objective" remains a persistent issue. This implementation gap continues to significantly impede the "Ease of Doing Business" for developers. A particular bottleneck is often encountered in the process for furnishing information to the Revenue Department for the calculation of conversion charges and NA cess, which can delay project commencement and add to costs.

**To address these challenges, the following immediate actions are recommended:**

- **Policy Clarification and Binding Directives:** An immediate, comprehensive, and unambiguous circular must be issued to all revenue officials. This circular should explicitly re-state that no prior Collector permission is required for NA use of land within approved Development Plan areas under Municipal Corporation/Council jurisdiction. Furthermore, it should clearly outline the exact, simplified procedure for furnishing information for charge calculation, ensuring absolute uniformity across all Collectorates and eliminating any scope for misinterpretation or arbitrary demands.
- **Digital Integration for Automated Charges:** The proposed 'Data Bank' must be fully operationalized and enhanced into a robust, centralized online portal. This portal should enable automated calculation and generation of demand for conversion charges and NA cess based on pre-fed Annual Statement Rates (ASR) data. This demand should be generated immediately upon receipt of development permission from the planning authority, minimizing manual intervention and eliminating delays in financial assessment.
- **Strict Time-Bound Processing:** Specific, short timelines must be mandated and strictly enforced for the Revenue Department to process the information and generate the demand for conversion charges once development permission is obtained. A target of 7-15 working days for this process would provide much-needed predictability for project financial planning and significantly reduce the time taken for project initiation.

## **B. Rationalizing Royalty on Excavated Earth**

The issue of royalty on excavated earth continues to be a significant point of contention and delay for the construction sector. Despite the clear Supreme Court Order dated December 3, 2014, which opined that royalty is not applicable for earth excavated solely for foundation purposes and redeployed on-site [1, 1], industry bodies like CREDAI-MCHI have consistently reported that Tahsildars and Collectors continue to "harass" developers by insisting on royalty payments, questioning their activities, and causing significant delays. Beyond legal interpretation, operational inefficiencies such as time-consuming site visits by Circle Officers/Talathis, the issuance of royalty permissions for very short, impractical periods (e.g., 15, 20, or 25 days), and a fragmented authority structure involving multiple officials (Collector, SDO, Tahsildar) for different quantities exacerbate project delays and can lead to arbitrary penalties.

To rectify this, the following immediate actions are recommended:

- **Binding Circular and Training:** A comprehensive and legally binding circular or notification, as repeatedly requested by CREDAI-MCHI, must be immediately issued. This circular should explicitly reiterate the Supreme Court's judgment on royalty for excavated earth used for foundation/basement and redeployed on-site. Crucially, this must be accompanied by mandatory and recurring training programs for all revenue officials to ensure clear understanding and consistent implementation of the judicial pronouncement across all districts.
- **Self-Declaration and Post-Facto Audit:** A simplified self-declaration mechanism should be introduced for developers regarding the quantity of excavated earth and its on-site redeployment for foundation/basement purposes. This system should be subject to robust post-facto audits to ensure compliance, rather than requiring cumbersome and time-consuming pre-approval site visits. This approach aligns with the Supreme Court's emphasis on "precise determination of the end use" and promotes trust while maintaining regulatory oversight.
- **Single Window System and Extended Validity:** The Collector's office should implement a "single window system" for all royalty permissions, irrespective of the quantity of earth to be excavated. Furthermore, permissions should be approved for the total requested quantity for a significantly longer, more realistic period (e.g., linked to the project's excavation phase or overall construction timeline), thereby eliminating the need for repetitive, short-term applications and associated administrative burdens.

## **C. Enhancing Property Card Portal Accessibility and Reliability**

The accessibility and reliability of the property card portal are critical for transparency and efficiency in land transactions and project development. The user query specifically highlights the "issue of restoration of property card portal accessibility," indicating persistent problems. While online portals like the Grievance Redressal System IGR and Mahabhulekh exist for property-related services, existing reports indicate significant technical failures such as "the server is not working" and "Report Viewer Configuration Error". These issues undermine the very purpose of digital initiatives, often necessitating physical visits and attestations, which defeats the objective of "Ease of Doing Business" and causes considerable inconvenience to citizens and developers alike.

To ensure seamless digital access and enhance reliability, the following immediate actions are recommended:

- **Robust Digital Infrastructure and Uptime:** Significant investment must be prioritized for upgrading and maintaining the Mahabhulekh and e-Property Card portals to ensure 24/7 accessibility, high stability, and fast response times. Proactive measures must be taken to address and resolve recurring technical errors (e.g., "Report Viewer Configuration Error") and persistent server issues through dedicated IT teams and robust infrastructure. Regular stress testing and performance monitoring should be institutionalized.

- **Universal Acceptance of Digital Signatures:** It is imperative to ensure that digitally signed property cards and 7/12 extracts are legally recognized and universally accepted by all government departments (e.g., planning authorities, sub-registrar offices) and financial institutions without mandating additional physical attestations. Past practices requiring such attestations have caused significant inconvenience and negated the benefits of digitization. A clear circular to all stakeholders on this matter is essential.
- **Real-time Data Integration and Integrity:** Advanced mechanisms for real-time updates of property records across all relevant databases must be implemented, especially following the registration of documents and mutations. This will ensure that the property card consistently reflects the most current, accurate, and undisputed ownership and land details, thereby reducing disputes, enhancing transparency, and building public trust in digital land records.

### **III. Medium-Term Objectives: Policy Reforms for Growth (up to May 1, 2035)**

Building upon the immediate operational improvements, the medium-term horizon demands strategic policy reforms that address systemic issues, fostering a more conducive environment for real estate development and urban planning. These reforms are crucial for sustained growth and for realizing the broader vision of a developed Maharashtra.

#### **A. Addressing Land Subdivision and Fragmentation**

The prevalence of informal land subdivisions has created significant "discrepancies between the 7/12 land extract and official land maps," leading to "serious challenges in legal ownership, construction, and transactions". This issue has impacted "over 50 lakh families" and fostered "widespread unregulated growth" due to a lack of official building permissions and proper planning approvals. While the government's recent decision to legalize plots subdivided before January 1, 2025, is a "revolutionary step" towards regularizing historical anomalies, the effective implementation hinges on the finalization of a robust Standard Operating Procedure (SOP) by the designated four-member committee.

To ensure that this crucial reform translates into tangible benefits and prevents future fragmentation issues, the following medium-term reforms are recommended:

- **Expedited SOP Finalization and Public Dissemination:** The rapid finalization and widespread public dissemination of the SOP for regularization of subdivided plots must be prioritized. This SOP must be practical, user-friendly, and clearly outline the step-by-step process for landowners and developers to formalize their holdings. It should include provisions for simplified documentation, online application submission, and a clear grievance redressal mechanism to ensure that the process is accessible and efficient for all affected families.
- **Integrated Digital Mapping and Cadastral Modernization:** The ongoing initiative to "measure and map individual sub-plots" using modern technologies like drones and Geographic Information Systems (GIS) must be accelerated and expanded statewide. This digital mapping must be seamlessly integrated with the Mahabhulekh and property card systems to ensure real-time, accurate, and legally valid land records. The ultimate goal is to achieve complete "parity between the textual records (7/12 extract) and spatial records (cadastral maps)" across the state, thereby reducing disputes, enhancing clarity of ownership, and facilitating planned development.
- **Future-Proofing Legitimate Subdivisions:** Clear, simplified, and efficient processes must be established for legitimate future subdivisions of land parcels that comply with development authority norms. This should involve streamlined online application processes, pre-defined guidelines for minimum plot sizes and access, and time-bound approvals. Such a proactive approach will prevent the re-emergence of informal and unregulated subdivisions, ensuring that all future land divisions contribute to orderly urban growth.

## **B. Reforming Regularization of Breach of Conditions on Government Land**

The existing regularization process for breach of conditions on government-allotted land presents significant challenges. It is characterized by an excessively complex procedure, demanding an "extensive list of required documents" and a multi-level approval workflow that extends from the Tehsildar to the State Government. A major disincentive for regularization is the valuation of penalties based on the "Annual Statement of Rate (Ready Reckoner rate) of the year when the breach of condition happened". This retrospective application of ASR can lead to an "added burden to pay for the class conversion at the existing ASR" [user query], especially for long-standing breaches where current ASRs are significantly higher than at the time of the breach. Furthermore, the recent policy for Class II to freehold conversion has raised concerns from stakeholders like the Federation of Government Grantis Lands (FGGL) regarding high premiums (15% of ASR for residential) and the exclusion of certain entities, such as Cooperative Housing Societies on leasehold land, from available benefits. The short application window (10 months, ending December 31, 2025) for this policy also creates undue pressure.

To make the regularization process more equitable, efficient, and aligned with the state's development objectives, the following medium-term reforms are recommended:

- **Rationalized and Equitable Premium Structure:** The premium structure for regularization of breach of conditions, particularly for conversion from Class 2 to Class 1 (or leasehold to freehold), must be re-evaluated and rationalized. Consideration should be given to implementing a tiered approach or a cap on the ASR date used for valuation (e.g., ASR of the current year or the year of application, whichever is lower, or a fixed historical ASR), especially for long-standing breaches, to make regularization financially viable and equitable for landholders. Explicit measures must be taken to address the concerns regarding Cooperative Housing Societies on leasehold land to ensure they receive benefits comparable to those on Occupancy Class II land, fostering fairness across all land tenure types.
- **Simplified and Transparent Digital Process:** A fully digital platform for the entire regularization process should be developed and implemented, from application submission to final order issuance. This platform should feature simplified document requirements, clear status tracking for applicants, and online payment options. Such a digital transformation will significantly reduce bureaucratic hurdles, promote transparency, and minimize opportunities for discretionary actions, thereby expediting the process and reducing opportunities for corruption.
- **Clear and Prospective Guidelines for Unearned Income:** Clear, prospective, and easily understandable guidelines for the calculation and payment of unearned income must be provided. These guidelines should ensure predictability for developers and landowners, encouraging timely compliance and reducing disputes. A transparent and predictable framework for unearned income fosters a more trust-based regulatory environment, which is crucial for long-term investment and development.

## **IV. Long-Term Vision: Sustainable Urban Development (Maharashtra @ 2047)**

The long-term vision for Maharashtra @ 2047 transcends immediate operational fixes and medium-term policy adjustments. It calls for a transformative approach to land governance that supports sustainable urban development, fosters resilient communities, and ensures affordable housing for all citizens. This requires a holistic perspective where all individual reforms converge into a cohesive, digitally-driven land administration system.

### **A. Unified Land Use and Development Framework**

The ultimate aspiration is for the Mumbai Metropolitan Region (MMR), and indeed all of Maharashtra, to operate under a truly unified, digitally integrated, and dynamic land use and development framework. Such a framework will eliminate fragmented regulations, reduce jurisdictional overlaps, and provide a predictable, efficient, and transparent environment that actively promotes sustainable urban growth and economic prosperity.

To achieve this, the following long-term transformations are envisioned:

- **Integrated Land Information System (ILIS) as a Single Source of Truth:** The development and implementation of a state-of-the-art, comprehensive Integrated Land Information System (ILIS) must be the cornerstone of this long-term vision. This system will serve as the single, authoritative source of truth for all land-related data. It will consolidate all land records—including ownership details, survey information, land use classifications, encumbrances, development permissions, and property card data—from various departments (Revenue, Urban Development, Forest, Local Bodies, etc.) into a real-time, interoperable, and publicly accessible database. This represents the ultimate evolution of the 'Data Bank' concept initially proposed and the ongoing subdivision mapping initiative. An ILIS will ensure that all decision-making is based on accurate, consistent, and up-to-date information, drastically reducing disputes and enhancing planning efficacy.
- **Dynamic and Adaptive Development Plans:** A transition from static, rigid development plans to dynamic and adaptive frameworks is crucial. These frameworks will be efficiently updated and refined in response to evolving urban needs, demographic shifts, technological advancements, and market demands. This agility will ensure that planning remains relevant and responsive, facilitating planned growth rather than becoming a bottleneck. Regular, data-driven reviews and amendments, possibly on a rolling basis, will replace infrequent, cumbersome revisions.
- **Proactive Land Banking and Strategic Infrastructure Development Authority:** Establishment of a dedicated, empowered state-level authority for proactive land banking and strategic infrastructure development is essential. This authority will systematically identify, acquire, and prepare land parcels for future housing, commercial, industrial, and public utility purposes. This proactive approach to land availability, as envisioned in the Maharashtra Housing Policy 2025, will reduce speculative pressures, ensure adequate land supply for planned development, and enable the state to guide urban expansion strategically.

## **B. Fostering Resilient and Affordable Housing**

The vision for Maharashtra @ 2047 includes a future where every citizen has access to safe, affordable, and quality housing, supported by robust, climate-resilient infrastructure, and developed through sustainable urban practices that enhance livability and environmental well-being.

To achieve this, the following long-term transformations are envisioned:

- **Accelerated Large-Scale Redevelopment and Slum Rehabilitation:** A long-term strategy for significantly accelerating the redevelopment of old, dilapidated buildings and comprehensive slum rehabilitation projects is imperative. With over 25,000 eligible buildings in MMR alone, addressing current delays and streamlining all approval processes are critical. This will involve leveraging innovative public-private partnership models with clear incentives, robust dispute resolution mechanisms, and a focus on community participation to ensure successful and equitable outcomes.
- **Incentivizing Green, Smart, and Sustainable Buildings:** Robust and long-term incentives must be introduced for developers adopting green building technologies, sustainable construction materials, energy-efficient designs, and smart city features. These incentives could include enhanced Floor Space Index (FSI), reduced premiums, fast-track approvals, and tax benefits. Such measures will not only contribute to environmental resilience and reduce the carbon footprint but also create healthier and more livable urban environments for future generations.

- **Dedicated Affordable Housing Land Policy and Funding:** A dedicated, long-term land policy must be developed to ensure the continuous availability of affordable land for housing projects across all income segments. This could involve innovative models such as land value capture, cross-subsidization, or direct allocation from the state's land bank, coupled with dedicated funding mechanisms to support affordable housing initiatives. This will address the fundamental challenge of land cost, which significantly impacts housing affordability.

The individual issues and reforms discussed in the immediate and medium term, such as NA permissions, royalty, property cards, land subdivision, and regularization of breaches, are not isolated problems but interconnected components of a larger, complex land administration ecosystem. For instance, accurate and accessible property cards are impossible without resolved land subdivision issues. Efficient NA processes depend fundamentally on clear and undisputed land records. The ultimate goal of providing "affordable and adequate housing for all" and achieving "planned growth and justice" relies on all these elements functioning seamlessly and in concert. The long-term vision must articulate how these individual reforms converge into a cohesive, digitally driven land governance system. This holistic perspective emphasizes that true "Developed Maharashtra" requires a well-designed, integrated system where the Revenue Department acts not just as a regulatory body but as a crucial enabler of economic activity, investment (e.g., ₹70,000 crore expected under the Housing Policy), and social welfare. The transformative role of the Revenue Department is central to the state's overall prosperity and livability.

CREDAI-MCHI reiterates its unwavering commitment to partnering closely with the Government of Maharashtra and the Collector's office in realizing the ambitious "Developed Maharashtra 2047" vision. The real estate sector, as a vital engine for economic growth and urban transformation, stands ready to contribute its expertise and resources to this monumental endeavor.

Thank you.

Yours sincerely,  
For **CREDAI-MCHI**



**Dominic Romell**  
President



**Dhaval Ajmera**  
Hon. Secretary



**Keval Valambhia**  
Chief Operations Officer  
Mob: +91 98709 85061