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Date: 10/11/2025

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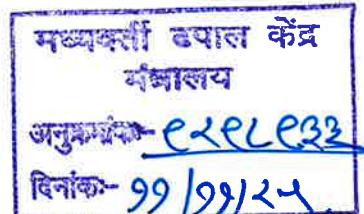
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To,
Shri Aseem Kumar Gupta (I.A.S.)
Additional Chief Secretary,
Urban Development Department (I),
Government of Maharashtra,
Mantralaya, Mumbai – 400032.



Subject: Proposal for an Addition to Sub-clause (23) of Clause 33(9) of the Development Control and Promotion Regulations (DCPR) 2034

Respected Sir,

We, the undersigned, are writing to you today to submit a constructive proposal for a minor yet significant amendment to the Development Control and Promotion Regulations (DCPR) 2034. This amendment aims to remove an unintended hurdle for ongoing Cluster Development Schemes (CDS) and further the objectives of urban renewal and housing for all.

We acknowledge and appreciate the visionary provisions under **Clause 33(9) of the DCPR 2034**, which provide a framework for the successful implementation of Cluster Development Schemes. Specifically, **Sub-clause (23) of Clause 33(9)** allows for the conversion of a CDS sanctioned under the earlier DCR 1991 to the new DCPR 2034, subject to certain conditions.

However, we have identified a specific scenario that is not adequately addressed, potentially stalling viable and ongoing projects. The current regulation does not explicitly clarify the applicability of **Sub-Regulation (3) of Clause 33(9)** in cases of conversion where no additional land is being pooled into the scheme.

Sub-Regulation (3) of Clause 33(9) mandates a minimum land parcel requirement for a new CDS. Applying this requirement to an *ongoing* scheme that is merely being converted from DCR 1991 to DCPR 2034—without any change in the project's land area—creates an impractical and unnecessary barrier. This can penalize projects that are already in the pipeline and have been planned based on the previously sanctioned land area.

Proposed Amendment:

To resolve this ambiguity and ensure a smooth transition for ongoing projects, we respectfully propose the following addition to **Sub-clause (23) of Clause 33(9)**:

"Provided further that the provisions of Sub-Regulation No. (3) of this Regulation shall not be applicable on the conversion of an ongoing Cluster Development Scheme sanctioned under Regulation 33(9) of DCR 1991 or DCPR 2034, where no additional land is pooled into the scheme upon such conversion."

We believe this minor modification is in line with the spirit of the DCPR 2034, which aims to promote systematic and sustainable development. It protects the interests of those who have invested in and committed to projects under the previous regulations while embracing the new framework.

MAHARASHTRA CHAMBER OF HOUSING INDUSTRY

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CREDAI-MCHI CHAPTERS

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We humbly request the Urban Development Department to consider this proposal favourably and initiate the necessary steps to incorporate this amendment into the DCPR 2034.

Thank you for your time and consideration of this important matter.

Yours sincerely,
For CREDAI-MCHI

A handwritten signature in black ink, appearing to read "Sukhraj Nahar".

Sukhraj Nahar
President

A handwritten signature in blue ink, appearing to read "Ruchi Mehta".

Ruchi Mehta
Hon. Secretary

A handwritten signature in blue ink, appearing to read "Keval Valambhia".

Keval Valambhia
Chief Operations Officer
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