

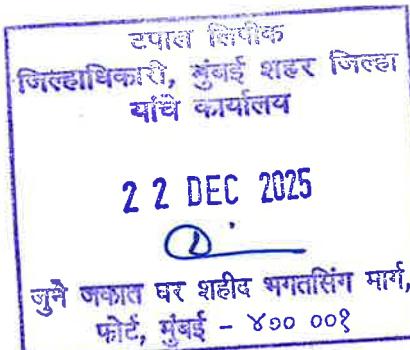
To,

1) Ms. Anchal Goyal (I.A.S.)

Collector, Mumbai City

2) Shri Saurabh Katiyar (I.A.S.)

Collector, Mumbai Sub-Urban District

Date : 22nd December 2025

22.12.25
महाराष्ट्र शहराधिकारी कार्यालय
मुंबई उपनगर जिल्हा

Sub: Embarking on a path to EODB 2.0 through policy tweaks and procedural changes to unleash the Real Estate Industry's potential for spurring on the economy and boosting development.

Respected Sir / Madam,

Today, we stand at a crucial crossroads as stakeholders of the real estate industry. We come before you not to seek concessions or handouts, but to humbly request a few policy and procedural modifications that will significantly enhance the ease of doing business within our industry.

We all associations CREDAI-MCHI, BDA, PEATA & NAREDCO come before you not as separate associations but as one voice for bringing about the betterment of our Industry. We and our members are the true instrumentalities for development in Mumbai MMR.

We see ourselves consider ourselves as partners of the Government entrusted with the responsibility for catering not only to the housing demand of the city through sustainable development but also bring about rapid growth through the multiplier effect that our Industry brings into play.

We are attaching herewith a list of issues in detail for your kind perusal and necessary direction.

Thank you for kind consideration.

Yours sincerely

Sunil
CREDAI-MCHI
President

Sadeen
NAREDCO Maharashtra
President

Pradeep
PEATA
President

Praveen
BDA
President

Encl : As mentioned Above



Points for discussion in the meeting with Collectors on 22/12/2025 at 11.00 AM

Sr. No.	Point for Discussion	Suggestion by Joint Task team	Remarks / Decision
1	If Area of property is not mentioned in separate P.R. cards after sub-division, fees is recovered on entire gross area.	To get separate P.R. Card for small portion of larger C.T.S. Number. The scrutiny fees amount/ JM fees amount shall be insisted only for the area for which separate P.R. Card is requested, and not the entire gross area of the plot & accordingly separate PRC should be issued.	
2	Automatic update of Index -II in PR card.	Cognizance of the same is to be taken in form of mutation entries on PR card Suo moto while registering the transfer documents in the name of appropriate authority.	
3	NA permission	<p>As per new GR for plots included in Development plan, NA permission is not necessary and that the charges will be collected by respective local planning authority while approving the building proposals on that land</p> <p>As such charges / Fees of N.A. should be collected by BMC at the time of issue of IOD /CC & should be transferred to concerned Revenue Dept.</p>	
4	SOP for Sanad / NA as per recent GR As per new directive / GR from govt. Sanad will be issued and	A SOP for calculations of Sanad Permission / NA tax calculations should be made as per EODB in online AutoDCR portal of BMC which will help	



	one-time charges will be required for various cases. Same needs to be implemented immediately.	to expedite process as per EODB. If required a task committee can be formed within one week for discussion of SOP before publishing it. Same should be completed within fixed time frame for implementation at the earliest.	
5	JM should not be required to be done multiple times at the time of Subdivision, separate PR cards, if the boundaries do not changes after MR is done.	If measurement fees once paid to CT Survey office for any purpose like demarcation, N.A. permission, Sub-division etc., Then fees should not be recovered every time for different purposes as the record of same is permanently available with CTS office.	
6	A. Validity Of Royalty: Excavation process during development gets delayed many times due to unforeseen conditions. At present Royalty permissions are issued with validity of 3 months only. Due to this many times premium paid for Royalty is under utilized and there is no process for refund or adjustment of Royalty amount paid.	Royalty permission should be valid till completion / removal of excavated earth for which permission is sought or Royalty amount is paid. If same is issued as system generated NOC on payment of premium then validity issue won't arise. In this process Royalty payment and NOC will be issued on need base.	
	B. Royalty Process: Royalty process and its validity is still not as per EODB	Though royalty process is online, same still requires manual intervention. Therefore, permission for Royalty premium should be made online in BMC's AutoDCR portal. On payment a system generated NOC will be sufficient as Royalty permission.	



	C. Royalty within the Same Plot (CTS Number)	Royalty is currently levied even when soil is merely shifted during cut-and-fill operations within the same project premises. Logically, royalty should apply only when soil is transported outside and commercially used.	
	D. Excessive Royalty Rates	The present rate of ₹600 per brass plus taxes is disproportionately high, escalating project costs	
	E. Calculation Challenges	It is practically impossible to calculate the exact brass of soil in advance, as excavation quantities vary depending on soil conditions and site requirements.	
	F. Upfront Payment Burden	Large upfront royalty payments severely affect project cash flows, particularly given Mumbai's variable soil profile and extended monsoons.	
7	Amalgamation of plots under different tenures	<p>C.T. Survey office does not give single P.R.C. in case of different tenure of plot even if MCGM approves the amalgamation of different tenure plots.</p> <p>As per Reg. 33/9 of DCPR 2034 any urban renewal scheme can be approved on minimum 4000 sq. mtrs. with different amalgamated plots of different tenures, either free hold or lease hold lands. Considering this provision Collector should approve the amalgamation of different tenures of lands and issue single P.R. Cards by taking necessary directions from Revenue Department of Govt. of</p>	



		Maharashtra to make necessary changes.	
8	Procedure post deemed conveyance	If order is issued for Deemed Conveyance in favour of the Society then CTSO should be authorized to prepare separate C.T.S. Plan and P.R. Card.	
9	Layout/sub-division	If Layout/sub-division is approved by B.M.C. same should be marked on the tikka sheet / C.T.S. Plan suo moto by revenue department and prepare the separate P.R. Card & CS plan for each plot.	
10	Sub-division order by Collector should not be insisted, if plot is naturally Sub-divided due to provisions of sanctioned development plan like DP roads, various reservations and also for setback area for widening of the existing roads.	<p>a) Sub-division application can be made to C.T.S. office directly without insisting approval from BMC and taking undertaking from owner concerned for sub-division of land to ease the procedure of sub-division under EODB.</p> <p>b) Further in case Natural Sub-division due to roads and reservation as shown in development plan, Property should be sub-divided by obtaining undertaking from owner for natural sub-division of the land for reservation area & transferring directly to concerned authority by obtaining concurrence from Government of Maharashtra as per EODB Policy.</p>	
11	Discrepancy in CTS Map & actual site condition as far as plot boundaries are concerned & Sub-division order to be given by collector.	If is suggested that, if compound wall is existing since 1960 onwards in any proposal as per old approval/ existing on site, Plans should be approved considering existing compound wall &	



		if discrepancy then stringent of C.T.S. boundary & existing compound wall to be adopted for working out open space requirements to achieve the purpose of EODB.	
12	Charging Fees for surveys proportionate to individual plot area in Mhada/private/ prmerger lay out instead of recovery of total plot area each time when individual plot holder comes for survey.	<p>Orders in this respect should be obtained from Revenue Dept. / government for charging fees proportionately on area in possession of individual plot owner instead of area of whole plot for charging fees.</p> <p>- Proposal to Revenue Department</p>	
13	CTS record like existing building etc. may be updated at the time of finalisation of DP each time.	Cognizance of same is to be taken by revenue department as per resurvey done while finalizing the D.P. each time.	
14	<p>Suo Moto transfer of land acquired as per DP provisions for Roads and Reservations to concerned authorities.</p> <p>Generally, reservations / Roads are handed over either in advance or during phase of constructions to BMC. Same are taken over by BMC subject to verification of area by CTS office.</p>	<p>Cognizance of the same is to be taken by revenue department in form of mutation entries on PR card while registering the transfer documents in the name of appropriate authority.</p> <p>In case of transfer of the road/ reservation in past already taken over by authority, shall be done Suo Moto by revenue department without insisting any procedure from owner of the plot for transferring the said in the name of appropriate authority, as owner of the plot is not interested in this procedure at this point of time as the area is already taken over by appropriate authority.</p> <p>On receipt of letter from BMC, CTS office should carry out survey within 15</p>	



		days and certify final area. Survey fees for same also should be taken for area of Reservation / Road only instead of complete plot.	
15	Update of CTS boundaries and plot numbers as per Sanctioned TP record.	Suo Moto Cognizance of sanctioned TP scheme & Records like boundary, area & ownership of plot is to be taken by revenue department immediately in PR card & CTS plan & accordingly circular to be issued to all CTS offices.	
16	SOP for Sub-division / Amalgamations of P. R. Cards As per present practice Sub-division / Amalgamation process takes long time for approval and implementation.	A SOP for sub-division / Amalgamation as per EODB should be made by delegating power at City Survey office itself so that after approval from BMC CTS office can carry out survey and survey report and final areas can be sent to Collector for information and record purpose. Recently govt. has revised charges for survey by city survey departments. By above SOP, same will reduce burden on department and unnecessary payment of survey fees by land owner / developer.	
17	Survey Fees: Recently survey fees were revised / increased by Govt. exorbitantly. There are two categories in fees and same is not accepted at zonal City survey office. Also, as per present practice multiple surveys are carried out during development.	A SOP for various types of survey should be made and we should formulate guidelines to avoid multiple surveys under different heads like N.A. / Demarcation / Joint measurement / Sub-division/ handing over of reservation / Change of Holder etc. for development. This will help in fast tracking development and will save lot of repetitive survey by CTS office.	



		<p>- Proposal to Revenue Department</p>	
18	Currently the premiums for conversion from collector land to free hold are exorbitant	<p>We proposed to adopt central government policy by charging 10% of Land ASR or less</p> <p>- Proposal to Revenue Department</p>	
19	Validity of P.R. cards	<p>Since P. R. card issued by revenue authority as per their record, then the same should be valid perpetually till any change in area or name of owner.</p>	
20	Procedure for flat wise PRC to be notified.	<p>Government has declared to issue flat wise PRC same should be notified as early as possible so that all stakeholders will be benefited.</p>	

