



Ref. No. MCHI/PRES/26-27/028

Date: 09/6/2026

To,
Smt. Ashwini Bhide (I.A.S.)
Municipal Commissioner,
Brihanmumbai Municipal Corporation,
Fort, Mumbai - 400 001

Subject : Recommendation for Upward Harmonisation of Clubbing Provisions under Regulations 33(11) and 33(20) of DCPR 2034 – Request to Urban Development Department

Ref: Discussion held on 26th May 2026 during the meeting

Respected Madam,

CREDAI-MCHI respectfully submits that the present clubbing framework under DCPR 2034 requires harmonisation. Regulation 33(10) already recognises same-subregion clubbing across Island City, Western Suburbs & Extended Suburbs, and Eastern Suburbs & Extended Suburbs, while Regulations 33(11) and 33(20)(B) remain confined to a same/adjoining ward or 5 km test. Since all three clauses are rehabilitation-oriented and two of them directly create permanent transit camp, PAP, affordable housing and rehabilitation for public purposes, there is no strong planning reason for this asymmetry to continue.

CREDAI-MCHI therefore requests that BMC recommend to the Urban Development Department that Regulations 33(11) and 33(20) be amended on a like-to-like basis so that clubbing is expressly permitted city-to-city, western-to-western, and eastern/central-to-eastern/central, using the DCPR's own formal territorial labels. This recommendation can be routed through the ordinary MRTP Act modification process and with Government's use of Section 154 directions in this regulatory field.

The proposed amendment need not reduce any existing premium rate, ASR basis, instalment schedule, infrastructure charge or handover safeguard. For transactions already permitted today, public receipts remain unchanged. For same-subregion transactions currently blocked only by the geography test, public receipts become positive because the statutory premium and infrastructure-charge stream is unlocked. For 33(11) and 33(20), the regulations already preserve value through either premium or surrender of equivalent sale FSI in constructed BUA valued at ASR.

Accordingly, CREDAI-MCHI requests your good office to be pleased to recommend to the UD Department an upward harmonisation of the clubbing language in Regulations 33(11) and 33(20), while preserving all existing fiscal safeguards. Such a step would improve scheme viability, increase PAP/PTC/AH-R&R generation, simplify administration, and restore parity across similarly situated public-purpose housing schemes.

Thanking you,

Yours sincerely,
For CREDAI-MCHI

Sukhraj Nahar
President

Rushi Mehta
Hon. Secretary

MAHARASHTRA CHAMBER OF HOUSING INDUSTRY

Maker Bhavan-II, 4th Floor, 18, V. Thackersey Marg, New Marine Lines, Mumbai - 400 020, Maharashtra, India.
Tel: +91 22-42121421 Email: secretariat@mchi.net Website: www.mchi.net

CREDAI-MCHI CHAPTERS

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

PRESIDENT

Sukhraj Nahar

IMM. PAST PRESIDENT

Domnic Romell

PRESIDENT-ELECT

Bandish Ajmera

MENTORS

Abhishek Lodha

Vikas Oberoi

Parag Shah

Ajay Ashar

Jayesh Shah

Vinod Goenka

Vijay Parekh

SR. VICE PRESIDENTS

Shahid Balwa

Amit Thacker

Jackbansan Nazareth

Jitendra Mehta

Pritam Chivukula

Nallesh Shah

Shallesh Puranik

VICE PRESIDENTS

Mukesh Patel

Tariq Ahmed

Dhaval Ajmera

Gurminder Singh Seera

Sunny Bijlani

HON. SECRETARY

Rushi Mehta

TREASURER

Nikunj Sanghavi

JT. SECRETARIES

Dr. Adv. Harshul Savla

Sudhanshu Agarwal

Ricardo Romell

Prashant Khandelwal

Manan Shah

Anuj Goradia

JT. TREASURERS

Jayesh Chauhan

Hussain Lalani

COMMITTEE MEMBERS

Raeesah Kanakia

Subodh Runwal

Parag Munot

Sandeep Raheja

Umang Kuwadia

Parth Mehta

Munish Doshi

Harmohan Sehgal

Ranjesh Prajapati

Shallesh Sanghvi

Manan Shah

Priya Gurmani

Ayushi Ashar

Vijay Lakhani

Pratik Patel

Binitha Dalal

Rikhav Shah

INVITEE MEMBERS

Rahul Sagar

Ramkrishna Rabeja

Nishant Agarwal

Ajay Nahar

Jayvardhan Goenka

Sahil Parikh

Gaurav Thakker

Abhishek Sharma

Harsh Mehta

Rushi Ajmera

Azif Gani Daralya

Srirang Athalye

Cyrus Mody

Arif Fazlani

Chintan Sheth

Karan Sehgal

Punit Gosrani

Vicky Oswal

Aditya Shah

Aditya Birchandani

Arahad Balwa

YOUTHWING CONVENOR

Samyag Shah

PROCUREMENT CONVENOR

Nimish Ajmera

WOMENS WING CHAIRPERSON

Aika Doshi