

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL****WESTERN ZONE BENCH, PUNE****MEMORANDUM OF APPLICATION****(UNDER SECTION 14 OF THE NATIONAL GREEN TRIBUNAL ACT****2010)****ORIGINAL APPLICATION NO. 75 OF 2022**

Rekha Sankhala &amp; Ors.

...Applicants

Vs.

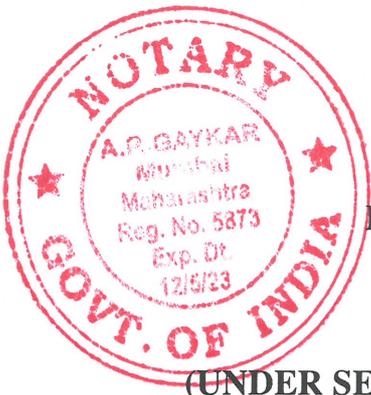
City and Industrial Development

Corporation of Maharashtra Ltd. &amp; Ors.

...Respondents

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BEFORE THE NATIONAL GREEN TRIBUNAL

WESTERN ZONE BENCH, PUNE

(UNDER SECTION 14 OF THE NATIONAL GREEN TRIBUNAL ACT,  
2010)

ORIGINAL APPLICATION NO. 75 OF 2022

**BETWEEN**

Rekha Sankhala & Ors.

...Applicants

versus

City and Industrial Development Corporation

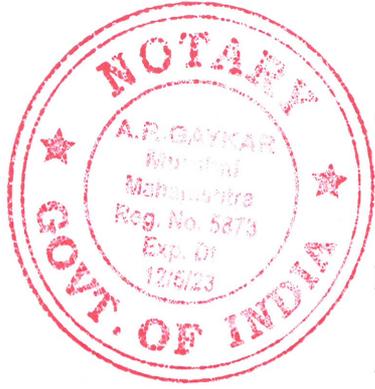
Of Maharashtra Ltd. & Ors.

...Respondents

**AFFIDAVIT IN REJOINDER ON BEHALF OF THE APPLICANTS:**

I, Rekha Sankhala, the Applicant No.1 herein, residing at 12/801, NRI Complex, Nerul, Navi Mumbai 400 706, do solemnly affirm and state as follows:

1. That I have read a copy of the Affidavit in Reply filed by the Respondent No.1 dated 14<sup>th</sup> November 2022 and am filing this Affidavit in Rejoinder thereto with a view to controvert the contents of the same and place the relevant facts on record. I deny the



contents of the Affidavit to the extent that the same are contrary to and/ or inconsistent with basic facts and ground realities stated herein. I repeat and reiterate the contentions made in the Original Application.

2. The Respondent's contentions in the Reply can be summarized as follows-

- (a) The present application is not maintainable as the NGT has no jurisdiction to restrict the alienation of land;
- (b) The successful bidder would be required to obtain necessary approval from the competent authority and thus adequate safeguards are inbuilt into the tender process;
- (c) Regulation of development activities under the CRZ Notification is required to be ascertained on the basis of the CZMP and not the Navi Mumbai Development Plan;
- (d) The Development Plan only broadly earmarked 'in an indicative manner' the No Development Zones and has limited applicability;
- (e) There is no restriction on inclusion of the mangrove buffer zone as part of larger plot;

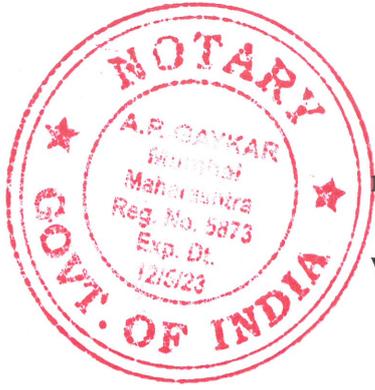


- (f) Under the draft CZMP prepared under the 2019 notification plot No. 2A falling with CRZ-II would become non-CRZ;
- (g) That the Draft Development Plan prepared by the Navi Mumbai Municipal Corporation no longer shows Plot No.2A as No Development Zone – it is shown as a ‘social facility’;
- (h) That CIDCO is exclusively entitled to take steps for the development of undeveloped plots including the power to assign use of plots and dispose of plots;
- (i) That clause 3.1.1(ii) of the UDCPR 2021 is applicable only to cases where the entire plot is within 15 m. of the water mark of a major water course;
- (j) That DPS Lake adjacent to plot no. 2A has not been identified as a wetland and has not ecological significance;

3. The point-wise response of the Applicants to each of these contentions is as under:-

**A. That the NGT has no jurisdiction to restrict the alienation of land:**

4. It is submitted that the NGT is empowered to take both *preventive* and protective measures for the protection of the environment as reflected in section 20 of the NGT Act. Section 20 of the NGT Act

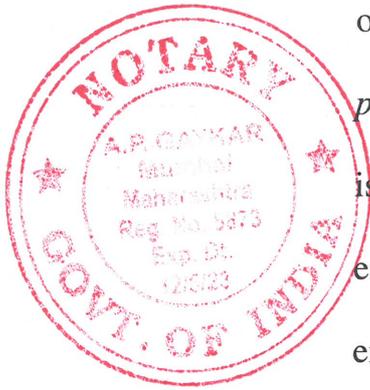


requires the Tribunal to apply, *inter alia*, the precautionary principle while passing any order or decision or award.

5. Furthermore, the NGT has been empowered under section 14 of the National Green Tribunal Act, 2010 to deal with any “substantial question relating to the environment” which has been defined to include a direct violation of a specific statutory environmental obligation by which the community at large other than an individual or group of individuals is affected or *likely to be affected* by the environmental consequences.

(emphasis supplied)

6. It is submitted that in the present case the auctioning of a plot which includes CRZ areas where construction activities are barred under the CRZ Notification, 2011 is a direct violation of the said notification and thus a violation specific statutory environmental obligation on the part of the Respondent No.1.
7. In the matter of *Municipal Corporation of Greater Mumbai v. Ankita Sinha & Ors.* (Civil Appeal Nos. 12122-12123 of 2018) while reflecting on the powers of the NGT, the Supreme Court has



observed that the role of the NGT is to perform roles that are *preventative*, ameliorative or remedial in nature. Thus, the Tribunal is required to play a proactive role in ensuring that damage to the environment is not caused and not merely to step in once environmental laws are violated.

8. In *Ankita Sinha* (supra) the Hon'ble Supreme Court further observed as under-

*“67. The NGT is a Tribunal with sui generis characteristic, with the special and all encompassing jurisdiction to protect the environment. Besides its adjudicatory role as an appellate authority, it is also conferred with the responsibility to discharge role of supervisory body and to decide substantial questions relating to the environment. The necessity of having a specialized body, with the expertise to handle multidimensional environmental issues allows for an all encompassing framework for environmental justice. The technical expertise that may be required to address evolving environmental concerns would definitely require a flexible institutional mechanism for its effective exercise.”*

9. Thus, this Hon'ble Tribunal, applying the precautionary principle, has the power to restrict the alienation of land to the extent that such alienation is for the purposes of carrying out an activity which is explicitly prohibited by the CRZ Notification. Further, as observed by the Hon'ble Supreme Court, the mandate and jurisdiction of the

NGT is conceived to be of the widest amplitude and it is in the nature of *sui generis* forum.

10. It is submitted that the present OA is concerned not merely with the alienation of land but with the alienation of land for the purpose of construction for residential and commercial purposes which is explicitly barred by the CRZ Notification.

**B. Successful bidder would be required to obtain necessary approval from the competent authority:**

11. Clause 3 (xii) read with clause 8 (i)(I) of the CRZ Notification, 2011 prohibits construction of any kind in CRZ-I(A) areas. The proposed use of plot no. 2A [part of which falls in CRZ-I(A) areas] for residential/ commercial is thus a *prohibited* activity under the CRZ notification and not a *regulated* activity. Similarly, construction activities in CRZ-II areas are restricted to the landward side of an existing road or existing authorized structure. Since Plot No. 2A falls on the seaward side of an existing road, construction activities are prohibited even in the parts of the plot falling in CRZ-II.

12. As such, the question of the competent authority scrutinizing the application for clearance does not arise, since an application can



only be made for activities that are regulated/ permissible under the CRZ Notification.

13. Furthermore, it is submitted that this Hon'ble Tribunal is sufficiently empowered under section 14 to prevent an act done in furtherance of something unlawful. Therefore, the clause of the tender document requiring the successful bidder to obtain necessary approvals from the competent authority does not preclude this Hon'ble Tribunal from scrutinizing the legality of actions of the Respondent, to the extent that the same are in violation of the provisions of the CRZ Notification, 2011.



14. It may be noted that the Respondent No.1 is an arm of the State Government and cannot act in an arbitrary manner which results in loss and inconvenience being caused to an unwitting 3<sup>rd</sup> party, if it is indeed found at a later stage that the land in question cannot be developed. The moment 3<sup>rd</sup> party rights are created, such parties acquire a vested right in the property. It is to avoid such a situation that the interim direction passed by this Ld. Tribunal dated 22<sup>nd</sup> August 2022 was necessitated.

**C. That the regulation of development activities under the CRZ Notification is required to be ascertained on the basis of CZMP and**

not the Navi Mumbai Development Plan – the CZMP shows that plot No. 2A is on the landward side of an existing of road and existing authorized structure:

15. Clause 8 (i) (II) of the CRZ Notification which sets out activities that are permissible in CRZ-II areas states that buildings shall be permitted on the landward side of the “existing road” or on the landward side of the “existing authorized structures”.

16. The Coastal Zone Management Plan Maps or CZMP Maps do not reflect existing roads or existing authorized structures as is evident from the legend of the CZMP map.

17. Further a perusal of Annexure IV of the CRZ Notification 2011 which sets out guidelines for the preparation of CZMP maps will demonstrate that CZMP maps are not required to show existing roads.

18. It is for this reason that CZMP maps must be read in conjunction with the Development Plans for the concerned area to determine permissible activities, particularly in CRZ-II areas where reference is made to existing roads and existing authorized structures. The



Development Plan prepared under the provisions of the Maharashtra Regional and Town Planning Act, 1966 (“MRTP Act”) is required, under S.22 (d), to show existing roads. It is for this reason that the Applicants have sought to rely on the Development Plan prepared under the MRTP Act.

19. It may be noted that several provisions of the CRZ Notification refer to the respective town and country planning regulations thus indicating that the CRZ Notification has to be read conjunctively with the applicable planning regulations of the concerned coastal area.

20. The contention that Plot No.2A is on the landward side of NRI Housing Complex and is thus on the landward side of an “Existing authorized structure” is denied. A satellite image of Plot No.2A will show that it lies to the east of NRI Housing Complex and not on the landward side (which would have to be towards the north) of this existing authorized structure. Consequently, it does not fulfil the criteria required under clause 8(II)(i) of the CRZ Notification, 2011 and is thus not amenable to development and construction. The Applicants deny that Plot No.2A is on the landward side of an existing authorized structure and therefore the question of them



suppressing this alleged fact from this Hon'ble Tribunal does not arise. The Development Plan prepared by the Respondent No.1 itself demonstrate that Plot No.2A is on the seaward side of the existing road being Palm Beach Road, and thus development on the CRZ-II areas of this plot are barred under clause 8(i)(II) of the CRZ Notification, 2011.

21.It is denied that there is no restriction and/ or prohibition on the development and construction on Plot No.2A to the extent of the CRZ-II area for the reasons set out above.

**D. That the Development Plan only broadly earmarked 'in an indicative manner' the No Development Zones and has limited applicability after the sanction of the CZMP to determine the geographical status of land parcels:**

22.It is submitted that this contention is contrary to statute and the settled law on the subject.

23.Section 42 of the MRTP Act states that on the coming into operation of any development plan, it shall be the duty of the Planning Authority to take steps as may be necessary to carry out the



provisions of such a plan. Section 31(6) provides that a Development Plan will be binding on the Planning Authority.

24. Curiously the Respondent has itself sought to rely on the land protected as No Development Zone in the Development Plan to contend that it has due regard for environmental protection [Pg. 148, para 5(v)].



25. It is denied that the Development Plan shows only major city roads. Section 22 (d) of the MRTTP Act stipulates that the Development Plan shall indicate all transport and communications such as roads, highways, parkways, railways etc., including their extension and development.

26. It is emphatically denied that the CZMP of Navi Mumbai shows the existence of an existing road on the southern/ seaward side of Plot No.2A and that consequently Plot No. 2A falls on the landward side of the existing road. A zoomed in version of the relevant portion of the CZMP currently in force along with its legend is annexed hereto and marked as **Annexure "A-1"** which will sufficiently demonstrate

that no such road is indicated on the southern side of the Plot No. 2A.

27. It is submitted that there is no provision in the MRTTP Act or in any other law for “broadly earmarking in an indicative manner” any land use zones. The purpose of preparing a development plan is so that development activities are undertaken in a planned manner. In the matter of *Rajiv Mohan Mishra v. City and Industrial Development Corporation of Maharashtra Ltd.* the Bombay High Court held as under-

*“The position of a Development Plan is sacrosanct as indicated by section 46 which provides that the Planning Authority whilst considering application for permission shall have due regard to the provisions of any draft or final plan published by means of notice, submitted or sanctioned under the Act. Thus, a Planning Authority cannot grant a development permission which is contrary not only to a sanctioned Development Plan, but to a notified draft Development Plan.*

xxx xxx xxx

*On comprehensive analysis of the MRTTP Act, it is clear that it does not permit any development including erection or re-erection of structures or a layout or subdivision of a land contrary to a Development Plan. A Development Plan controls the use of lands or buildings by providing for various zones such as Residential, Industrial, No Development Zone etc.”*

Further the term unauthorized development defined under section 52 as including the “*use of land or building in contravention of the provisions of a Development plan*”, indicates that no development can be carried out contrary to the Development Plan. If the



proposition of the Respondent were to be accepted, the preparation of a Development Plan under the MRTTP Act would be meaningless. The Respondent has not set out any provisions of the MRTTP Act which empowers it to prepare nodal plans which are contrary to the sanctioned development plan.

28. For the reasons stated above the DP must be read along with the CZMP in ascertaining whether a particular land parcel falling within CRZ-II can be developed or not.

**E. No restriction on inclusion of mangrove buffer zone as part of larger plot:**

29. The CRZ Notification prohibits construction activities in CRZ-I(A) areas, which includes the mangrove buffer zone. As such the inclusion of such an area as part of a larger plot being auctioned for residential/ commercial purposes is unlawful.

30. It is necessarily implied from the provisions of the CRZ Notification that a CRZ-I(A) cannot be included as part of a plot being developed for residential/ commercial purposes. As such the contention that there is no specific bar in law to include such areas as part of a larger plot cannot be countenanced.





prepared under the 2019 CRZ Notification is therefore entirely misplaced.

**G. That the Draft Development Plan prepared by the Navi Mumbai Municipal Corporation no longer shows Plot No.2A as No Development Zone – it is shown as a ‘social facility’:**

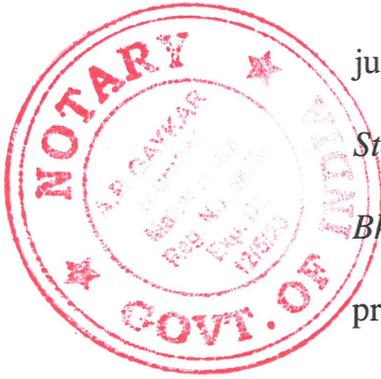
33. The draft development plan prepared by the NMMC has not been sanctioned. At present the Navi Mumbai Development Plan, 1980 as modified from time to time [Annexure A-3 (pg. 64), A-4 (pg. 65), A-5 (Pg. 66) of the OA] that are presently in force. As such the concerned area continues to be an NDZ in terms of the sanctioned Development Plan, as modified from time to time, referred to above.

34. On the one hand the Respondent seeks to rely on the draft Development Plan prepared by the Navi Mumbai Municipal Corporation (“NMMC”) while on the other hand it claims that it has objected to that very Development Plan. In any event, as stated above, the draft development plan would have no bearing in the present matter.



**H. That CIDCO is exclusively entitled to take steps for the development of undeveloped plots including the power to assign use of plots and dispose of plots:**

35. At the outset it is clarified that the present OA does not seek to raise any issues with respect to the powers of CIDCO as the New Town Development Authority *viz-a-viz* those of the Navi Mumbai Municipal Corporation as the Planning Authority and as such the judgment of the Bombay High Court in *Rupesh Namdeo Divekar v. State of Maharashtra* (PIL No. 67 of 2017) and *Nishant Karsan Bhagat v. CIDCO & Ors.* (PIL 22 of 2021), has no application in the present case.



36. In fact the OA has pointed out that the auctioning of the plot for residential and commercial use is contrary to the sanctioned development plan prepared by the Respondent No.1 itself. Notably, the Respondents have themselves stated that the nodal plans are required to be prepared 'in accordance with the permissible activities within the land use zone category in the sanctioned Development Plan of Navi Mumbai' [Pg. 144, para (i) of Reply].

37. While the Respondent has set out in great detail its powers to prepare/ revise/ modify nodal plans, sector plans or any other

detailed plan or layout, it has not produced any such plan that designates the area in question for residential/ commercial use.

38. In any event it is submitted that the sanctioned Development Plan would always prevail over any other plan or scheme that is contrary thereto. *Manohar Joshi v. State of Maharashtra* [(2012) 3 SCC 619] the Bombay High Court was considering the significance of a development plan in regulating development activities. In this case the Petitioner's contended that the landowner could develop his property as per the user permitted under the town planning scheme, regardless of the provisions of the Development Plan. Rejecting this contention the High Court held that a reading of the MRTP Act would show that the Development Plan prepared under section 22 would have primacy over a town planning scheme. It was held that a town planning scheme cannot be placed on the same pedestal as a development plan.

39. As per section 31(6) the planning authority cannot act contrary to the development plan and grant development permission to defeat the provisions of the development plan. In *Manohar Joshi* (supra) the Bombay High Court held that a duty is cast upon every planning



authority specifically under section 42 to take steps as may be necessary to carry out the provisions of the development plan. –



*“When it comes to the development in the area under the control of a local authority, a conjoint reading of the relevant sections makes the primacy of the development plan sufficiently clear.”*

40. The contents of paragraph 3 (III)(v) deal with the powers of CIDCO as the New Town Development Authority viz-a-viz NMMC’s power as the planning authority for the area in question and as such are not relevant to the controversy in the present matter. While the Bombay High Court in its order dated 30<sup>th</sup> August 2022 passed in the matter of *Nishant Karsan Bhagat v. CIDCO & Ors.* (PIL 22 of 2021) sought to be relied upon by the Respondent acknowledges CIDCO’s powers as the New Town Development Authority it does not comment upon CIDCO’s power to carry out development works contrary to the sanctioned Development plan. In fact the said judgment notes CIDCO’s submission that the nodal plans are prepared *“in conformity with the Development Plan and DCRs”*.

41. Notwithstanding what is stated above, if the DP were to be disregarded and only the CZMP relied upon, the reservation of the



plot as residential/ commercial would still be contrary to the provisions of the CRZ Notification for the reasons set out hereinabove.

- I. That clause 3.1.1(ii) of the UDCPR 2021 is applicable only to cases where the entire plot is within 15 m. of the water mark of a major water course:**

42.It is denied that the plot No. 2A is beyond 15 m. of the water mark of a major water course. It is submitted that a satellite image of the said plot shows that it is adjacent to the water body and as such would be subject to the restriction contained in clause 3.1.1 (ii) of the UDCPR 2021.

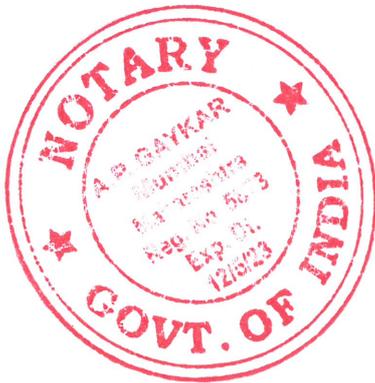
- J. That DPS Lake adjacent to plot no. 2A has not been identified as a wetland and has not ecological significance:**

43.I say that in the matter of Navi Mumbai Environment Protection Society v. Ministry of Environment & Ors. (PIL No. 218 of 2013) has recognized the ecological significance of the DPS Lake and has accordingly directed for the said lake to be preserved and protected.

44. An interim order dated 29<sup>th</sup> April 2014 came to be passed in the said wherein the High Court directed the authorities concerned to rejuvenate and restore DPS lake to its original condition, and further directed as follows -

*“12(a) We restrain the City and Industrial Development Corporation Ltd. (CIDCO) from destructing the DPS lake in any manner by carrying on any development activity on the area covered by the DPS lake which is approximately 30 Acres. The CIDCO shall take immediate steps to remove the debris dumped on the inlet through which creek water enters the DPS lake. The CIDCO shall be under an obligation to clear the dumping near the pipe which is referred to in the affidavit of the CIDCO. The CIDCO shall ensure free flow of creek water through the pipe and through the inlet to the DPS lake.*

*(b).....We make it clear that even if a preventive order is vacated by the State Government in view of the interim directions issued by this Court, the CIDCO shall not be entitled to develop the area covered by the DPS Lake. We make it clear that the CIDCO shall not carry out the dumping activities in or near DPS lake.”*



45. In the final order and judgment passed in the said matter, the High Court, after noting several judgments held that it is the Constitutional obligation of the State Government, the Government of India, CIDCO and the Navi Mumbai Municipal Corporation to protect, in all respects, the two lakes that were the subject matter of the PIL, including DPS Lake, and that a breach thereof will lead to

violation of the fundamental rights of citizens under Article 21 of the Constitution of India. Accordingly, directions were issued to ensure the free flow of creek/ sea water to DPS Lake. It was directed that the interim order dated 29<sup>th</sup> April 2014 would continue to apply to, *inter alia*, DPS Lake.



46. Significantly, the High Court noted that there was no dispute between the parties that DPS Lake exists. As such the Respondent cannot now contend that it is not in fact a lake but an abandoned salt pan and the nomenclature of 'DPS Lake' is erroneous.

47. With respect to the contention that this area is not a 'Wetland' as per the brief document prepared and submitted to the State Government for approval, it is submitted that the National Wetland Inventory and Assessment Atlas prepared by the Space Applications Centre sponsored by the Ministry of Environment and Forests, Government of India, has recognized DPS Lake as a wetland. As such, regardless of whether it has been notified as a wetland or not by the State Government it would have to be protected in terms of the Judgment of the Supreme Court in *M.K. Balakrishnan & Ors, v. Union of India* [Writ Petition (C) No. 230 of 2001] wherein it directed the

protection of the inventorised wetlands in terms of Rule 4 of the Wetland Rules, 2010.

48. Further, the process of finally notifying wetlands in the State has not yet concluded and the Respondents reliance on a proposed list of wetlands is misplaced.

49. For the reasons set out above, the interim order passed by this Ld. Tribunal ought to be confirmed and the Respondent No.1 be directed to exclude Plot No.2A from the E-tender cum E-auction initiated under Scheme No. MM/SCH-28/2022-23 and further, to preserve the said Plot as an open space as indicated in the layout plan prepared by the Respondent No.1.

Solemnly affirmed at Mumbai )

Dated this 14th day of December, 2022 )

*Rekha Sankhalz*  
Applicant No.1

Identified by me

*Meenaz Kakalia*  
Meenaz Kakalia

Advocate for the Original Applicants

Before me,

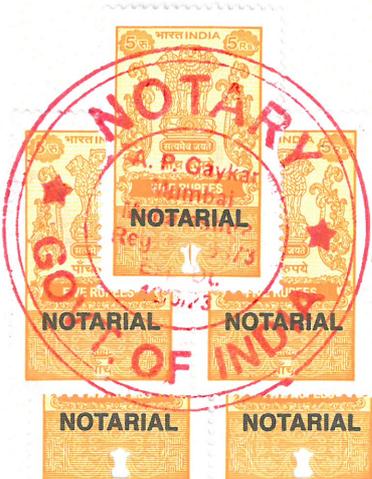
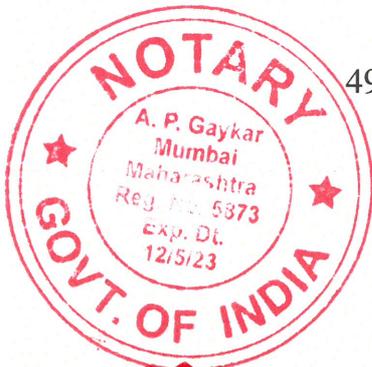
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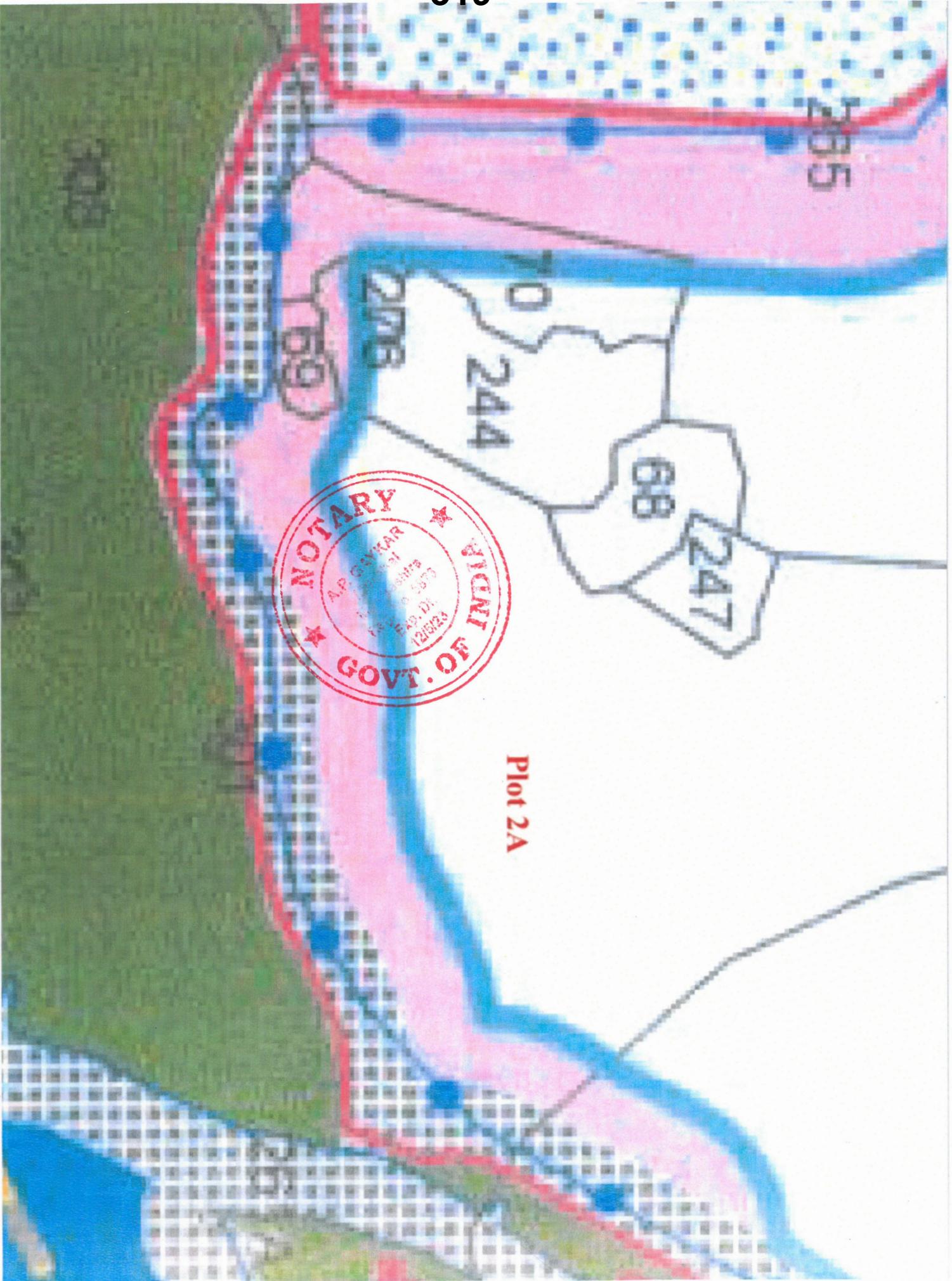
*Signature*

ASHOK P. GAYKAR  
B.Com, LL.B., G.D.C. & A.  
ADVOCATE HIGH COURT  
NOTARY GOVERNMENT OF INDIA  
Reg. No. 5873

Reg. No. *28*  
Sr. No. *3233*  
Date *14 DEC 2022*  
OF NOTARY REGISTER

**14 DEC 2022**





NOTARY  
 A.P. GAYKAR  
 GOVT. OF INDIA

Plot 2A

285

244

68

247

69

## Legend

- 
-  Road
  -  Ferry
  -  Railway Line
  -  Seawall
  -  High Tide Line (HTL)
  -  Low Tide Line (LTL)
  -  Taluk Boundary
  -  Municipal or Corporation Boundary
  -  Village Boundary
  -  Ward Boundary
  -  Survey Plots

## CRZ Lines & Boundary

-  Hazard Line
-  100 m Line in CRZ III Area
-  200 m CRZ Line - NDZ
-  CVCA
-  CRZ Boundary  
(500 m Line, 100 m for Bay, 100 m or width of the creek whichever is less along the tidal influenced water bodies)

# CRZ CATEGORY

## CRZ - I



CRZ - IA



50 m Mangrove Buffer Zone - (CRZ - IA)

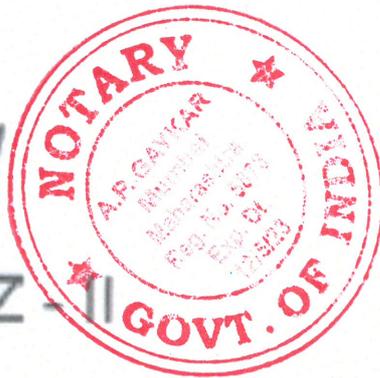


CRZ - IB

## CRZ - II



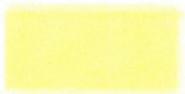
CRZ - II



## CRZ - III



No Development Zone



200 to 500 m from HTL

## CRZ - IV



CRZ - IVA



CRZ - IVB



**Legend**

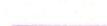
*Data Provided: MCZMA*

-  Road
-  Bridge
-  Ferry
-  Railway Line
-  Sluice
-  Ward Boundary
-  Municipal or Corporation Boundary
-  Taluk Boundary
-  Village Boundary
-  Survey Plots

**Data Source: NCSCM**

-  Lighthouse
-  Bund
-  Seawall
-  Jetty or Breakwater
-  High Tide Line
-  Low Tide Line
-  CVCA

**CRZ lines**

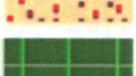
-  CRZ line for River or Creek
-  20m CRZ Line for Islands
-  50m CRZ line for Bay
-  50m CRZ Line - CRZ IIIA (NDZ)
-  200m CRZ Line - CRZ IIIB (NDZ)
-  500m CRZ line
-  Hazard Line - (Data Source: SOI)

**CRZ CATEGORY**

**CRZ - I**



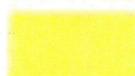
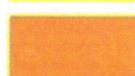
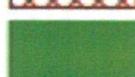
**CRZ CATEGORY**  
**CRZ - I**

-  Nesting Grounds of Birds - CRZ IA
-  Turtle Nesting Grounds - CRZ IA
-  50m Mangrove Buffer Zone - CRZ IA
-  Marine Protected Area - CRZ IA
-  Archaeological & Heritage Sites - CRZ IA
-  Corals and Coral Reefs - CRZ IA
-  Reserve Forests - CRZ IA
-  Salt Marsh - CRZ IA
-  Sand Dunes - CRZ IA
-  Mangroves - CRZ IA
-  Mudflats - CRZ IA
-  Beach - CRZ IB
-  Rock Outcrop - CRZ IB
-  Intertidal Zone - CRZ IB

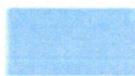
**CRZ - II**

-  CRZ landward of HTL - CRZ II

**CRZ - III**

-  50 to 500m from HTL - CRZ IIIA
-  200 to 500m from HTL - CRZ IIIB
-  No Development Zone - NDZ
-  NDZ - Within CRZ II - Greater Mumbai
-  NDZ - Within CRZ II - Greater Mumbai

**CRZ - IV**

-  Waterbody - CRZ IVA

