

Provisions Relating to Criminal Proceedings to Curb Offence of Unauthorized Development; Whether Applicable to Planning Authority as Well? A Case Study

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Abstract: *The article examines the role of Planning Authority in regulating development of lands/properties by the individuals within its local limits and the police power entrusted to it to initiate criminal proceedings against violation thereof by any individual or group of persons including Architects and contractors for abetting the offence of unauthorized construction. Most interestingly, the Authority too has a presupposed obligation to remain within the confines of Law in so far as the development / construction undertaken by it is concerned and is equally amenable to the said offence in case of violation of Statutory Rules. In such an event, the immunity i. e. protection from action under "good faith" is not available to the officers in default if it is proved that the officer has exceeded his jurisdiction or exercised his jurisdiction where it is not vested in him in undertaking development / construction or acted with mala fide intentions. In the ultimate analysis, this article is fortified by the legal maxim that whosoever intending judicial intervention must himself/ itself come with clean hands. This case study is a classic example of the Planning Authority invested with the police power to curb unauthorized development has itself been caught on the wrong foot. The article ultimately deals with two key issues namely: 1) Ownership and use of Statutory recreational open space of the sanctioned layout and 2) Provisions relating to criminal proceedings against unauthorized development / construction: persons vs authority.*

Keywords: Development, Unauthorized, cognizable offence, Good faith

1. Aims & Objectives

The development of lands and construction thereon in Maharashtra is being regulated by the Planning Authority like Gram Panchayat, municipal council/corporation, Development Authority within its local limits through Development Plan & Development Control Rules which are prepared under Maharashtra Regional & Town Planning Act, 1966 (hereinafter called "MR & TP Act, 1966"). The Development Plan broadly consist of:

- Zoning of lands like residential, commercial, industrial etc.
- Reservation of lands for various public purposes like schools, play grounds, gardens, parks, colleges, markets, dispensaries, maternity homes, Cultural Centre, stadium, roads and road widenings etc.
- Development Control Rules.
- Simultaneously, the principal Act viz MR & TP Act, 1966 too, amongst others prescribes the statutory obligation of every person intending to do development / construction to apply and secure permission from the local authority. A sacrosanct provision has been made in the Act that the decision of the Authority for grant / refusal of permission shall be in accordance with the DP & DC Rules in force. It thus prevents the Authority to act as per its whims and fancies or in an unlawful manner.

Additionally, teeth has been provided to the Planning Authority for regulating development within its jurisdiction

by empowering it to issue notice for discontinuance of unauthorized development, demolish unauthorized development and / or to initiate criminal proceedings against all the persons involved in the said unauthorized development by lodging First Information Report with the Police department.

While the universal and rampant unauthorized development / constructions throughout the country by the persons can be effectively dealt with by the aid of such police powers, the Planning Authority itself is not exempt from the offence of unauthorized development and it is equally amenable to the same set of rules and regulations.

This paper accordingly aims at evaluating the role of Planning Authority as regards undertaking / regulating development within its jurisdiction (by persons as well as by itself) in light of statutory provisions and judicial pronouncements.

2. Problem Statement

The case history of the blatant abuse of Police Power by the Planning Authority i. e. Municipal Council, Gondia (hereinafter called "MC, Gondia") in lodging FIR against the owners of land Survey No.251/12 - 13 of Gondia Khurd for the alleged offence of dislodging of municipal road is as under:

SN	Date	Particulars
1	23.4.2018	Layout approved of adjoining land kh.251/2 - 281/15B of Gondia by MC, Gondia.
2	23.4.2018	Statutory Open Space of sanctioned layout transferred to MC, Gondia.
3	Not known	9 meter cement road constructed from point A to B i. e. within sanctioned layout and from point B to C i. e. within land of applicant owner but who has constructed it is not on record.
4	14.6.23	Complaint by applicant owner to Collector, Gondia for revocation of layout permission being in violation of DC Rules and misuse of open space
5	29.8.23	Reply of MC, Gondia about the open space being temporarily used as road.
6	13.10.23	Applicant owner uprooted the cement road within his agriculture land from point B to C.
7	13.10.23	Criminal complaint & FIR no.0670 dated 14.10.24 u/s 154 of Cr. PC filed on behalf of MC, Gondia against applicant owner that they uprooted municipal road. It asserted for the first time that the road from point A to C has been constructed by MC, Gondia.
8	18.10.23	Rejection of complaint by MC, Gondia upholding approval to layout and road under use.
9	27.10.23	Applicant owner served notice on MC, Gondia u/s 304 of Maharashtra Municipal Councils, Nagar Panchayats & Industrial Townships Act, 1965 (hereinafter called "MM Act, 1956") for withdrawal of FIR, revocation of layout permission, recovery of municipal funds wasted on construction of road and grant of damages of Rs.10, 00, 000/- for misuse of his land & harassment.

At the cost of repetition, it is briefly described herewith that the MC, Gondia approved the layout of adjoining owner u/s 45 of MR & TP Act, 1966 and constructed 9 meter wide cement road within the statutory open space which has been transferred to it for maintenance. The said cement road extended up to the adjoining agriculture land of applicant owner. The resistance of the applicant owner for the unlawful construction of road within the statutory open space and within his land proved futile. He therefore uprooted/dislodged the said road from within his land. As a result, the MC, Gondia commenced criminal prosecution and filed a criminal complaint through one of its employee before Police Officer by lodging FIR against the applicant owner. It stated therein that the municipal road has been dislodged by the applicant owner alleging thereby, loss of municipal funds besides loss of public amenity. This FIR has been the cause of action by the applicant owner.

society/association of residents/ occupants. In case such society or association is to be formed, the **possession /custody** of open space shall remain with Chief Officer until such society/association is formed. The recreational open space shall not be sold to any other person and it shall not be put to any other user except for the common use of residents/occupants.

- b) If the authority is convinced that there is misuse of open space; in such case the authority shall take over the land of recreational open space.
- c) Continued from b above, additional provision under UDCPR No.3.4.2 - ii: - for maintaining it (i. e. open space) for the uses permissible under these regulations, subject to the condition that it shall not be further handed over or allotted to any person / institute/ authority other than the society / AOP / Occupants.).

A) Maharashtra Regional & Town Planning Act, 1966: -

3. Legal provisions

1) DC Rule 13.3.2 (a) dt.21.11.2013 (Currently UDCPR No.3.4.2 - i & ii): -

- a) On sanction of development permission, the recreational open space shall deem to have vested in the

Section	Particulars
46	Planning Authority shall have due regard to provisions of Development Plan & Development Control Rules while granting development permission.
51	Revocation of permission by Municipal Council, which has been granted by it.
52	Punishment & fine upon conviction for unauthorized development/construction
53	Notice by Municipal Council to offender requiring removal of unauthorized development; else demolition thereof by MC at the cost of offender.
54	Power of Municipal Council requiring offender to stop unauthorized development failing which, imprisonment & penalty to offender upon conviction.
55	Notice to offender for removal of unauthorized temporary development failing which, summary removal thereof at the instance of Municipal Council.
56	Power of Municipal Council to require removal of unauthorized development
56 - A	Punishment to Designated Officer of Municipal Council for his failure to take action against unauthorized construction.
57	Recovery of expenses incurred by Planning Authority for removal of unauthorized development from person in default or owner of plot.
147	Protection of action taken by Officers of Planning Authority in good faith from suit/prosecution/legal action

2) Analysis of problem in light of legal provisions: -

A) Very first and the foremost is that repelling the encroacher or dislodging / uprooting the unauthorized road (even if done by the Planning Authority) from within one's own land does not at all amount to an offence. Every person

is entitled to prevent the trespasser from unlawfully intruding into one's property with the application of optimum required physical force. This does not amount to taking Law into one's own hand. Hence, the applicant owner cannot be treated to

have committed any offence at all and thus not liable for prosecution.

B) Genesis of the problem: - The problem originated from the approval to the layout of land adjoining to the land of applicant owner and cement road constructed by the MC, Gondia within the statutory open space of the said layout.

It is a different issue that the approval itself to the layout granted by the MC, Gondia is unlawful as the plots have been proposed fronting on non - existing i. e. proposed DP road and that one piece of statutory open space does not have any existing access. It is beyond the scope of this paper.

Locus Standi: - Any citizen of the town however has a locus standi to challenge any unauthorized development / construction within its neighborhood as held by various High Courts below:

- 1. LR.1986.2. Kant.2536 - 2552. DB,
- RN Jain vs Nagpur Municipal Corporation.240. E.2009.

It has further been held by Hon'ble Bombay High Court: "open space as part of development project; once open space has always to be an open space to be used for the purpose for which it is kept. In case of any encroachment within open space, affected public, neighbors have a right to file petition." (2002 - 2 - M L J 590)

Hence, the applicant owner was fully entitled to challenge the unlawful approval to the layout which resultantly affected him as is being explained hereinafter.

C) The Building Byelaws & Development Control Rule (hereinafter called "DC Rules") No.13.3 of 21.11.13 (current Unified Development Control & Promotional Regulation of 2020 hereinafter called as "UDCPR" No.3.4 mandates provision of statutory open space to be provided in cases of approval to layout. Upon the date of sanction to layout, the said open space is stated to vest in the society/AOP/occupants for their common recreational use. However, until such society or AOP is formed or in cases of misuse of open space, the custody thereof is permitted with the Planning Authority. Note that the statutory provision permits, in such an instance, the **custody and not ownership of statutory open space with the Planning Authority and **that too for maintaining it** for the same recreational purpose and not to any other purpose.**

D) Contrary to the aforementioned statutory provision, the Planning Authorities at the time of approval to the layout u/s 45 of MR & TP Act, 1966 as well as the Revenue Authorities at the time of grant of Non - Agriculture permission u/s 44 of Maharashtra Land Revenue code, 1966 unlawfully direct the patwari of the town to struck down from 7/12, the name of owner of the land and mutate the said open space in favor of Planning Authority. In the instant case also, the MC, Gondia unlawfully got the said recreational open space mutated in its favor.

E) Court Judgements as to recreational Open Space: The view (that open space cannot be mutated in the name of Government or Local Authority and shall remain in the name of society / AOP / Occupant Plot owners or the original owner

in trust for the above till such society or AOP is formed has been taken by Hon. High Court of Judicature, Bombay in:

- SG Mutalik Vs Municipal Corporation, Aurangabad WP no.2975 of 2000 decided on 02.12.2014,
- VJ Patel Vs State of Maharashtra 2003 (3) M L J.215.

Some of the observations therein are as under:

- A proposal of construction in open space.... should be made only by the owner of the land or coop. society formed by plot holders.
- The title in the open space is not transferred from the petitioner to the municipal Council merely on passing of the layout.
- DC Rule No.14 (analogous to DC Rule no.13.3.8 of 21.11.2013 as well as current UDCPR No.3.4.7 of 3.12.2020) appears to have been framed in furtherance of section 183 of Maharashtra Municipalities Act, 1965 which relates to the laying out or making of a new street. It nowhere provides for the open space. Acquisition of open spaces is not contemplated u/s 183. Rule 14.3 which is a delegated legislation **cannot confer a power of acquisition of open space under the layout.**
- By no stretch of imagination, such piece of land (Open space.... supplied) would stand vested in the Municipal Corporation"

F) In a similar case, the Gram Panchayat of Ghodpeth, Tahasil - Bhadrawati, District - Chandrapur in Maharashtra had unlawfully allotted 400 sft of land out of the statutory open space of sanctioned layout no.115 of Shri Babulal Mishra to Tribal samaj for their community hall; duly resisted by the plot holders of the layout.

- New in Nava Bharat dated 28.11.2016.

G) The history is replete with cases where, the recreational open space has been transferred / allotted by the local authorities for extraneous purposes. A Circular No. Land.01/2006/ PK - 12/ J - 1 dated 25.5.2007 by Government of Maharashtra to that effect has already been withdrawn by it vide Circular No. Writ Petition - 2018/ PK.31/ J - 1 dated 5.9.2018 pursuant to following Writ Petitions decided by Hon'ble Mumbai High Court:

- Satara Distt. Coop. Hsg. Scty Federation vs Maharashtra in WP No.13416 / 2016 decided on 7.8.2018 read with
- Shri Gurudatta Coop. Hsg. Society vs Maharashtra in WP No.6357 of 2013 decided on 28.7.2016 relied upon
- Pt. Chet Ram vs MC, Delhi. AIR1995. SC430 by Supreme Court&
- VJ Patel vs Maharashtra.2003 (3) M. L. J.215 by SC.

The State Government has accordingly directed all the Planning authorities to act in accordance with DC Rule no.13.3.2 dated 21.11.2013 as regards ownership and mutation of statutory recreational open space i. e. in favor of society / AOP/ Occupants of the layout, not to be allotted to anybody else and shall not to be used for any purpose other than recreation.

H) The MC, Gondia was/is under a statutory obligation u/s 46 of MR & TP Act, 1966 to have due regard to the provisions of DC Rules in force. However, in getting the recreational open space mutated in its own favor and constructing cement road therein, besides unlawful approval to layout contrary to

DC Rules amounts to flagrant violation of section 46. It attracts invocation of judicial intervention as held by Hon'ble Supreme Court of India in:

- KR Shenoy vs Udipi Municipality. AIR (1974). SC.2177.

I) The MC, Gondia committed blunder by constructing cement road within the said recreational open space of the sanctioned layout. It was, firstly, not entitled/ supposed to be the owner of the open space. Secondly, it was not at all entitled to construct and allow the use of the said open space as road from point A to B for the neighboring locality despite being objected to by the applicant owner. This is flagrant violation of sections 52 to 55 of MR & TP Act, 1966 relating to unauthorized development by the MC, Gondia. Needless to say that the aforementioned set of provisions is a two edged weapon and applies squarely upon Planning Authority as well if found to have indulged in undertaking or promoting unauthorized development.

J) The MC, Gondia further aggravated the matter by extending construction of cement road within the agriculture land of the applicant owner from point B to point C. It did not have any authority to even enter into the land of applicant owner, much less construction of road therein. The fact of the construction of cement road by the MC, Gondia has, for the first time been admitted by it in the FIR which was filed on behalf of Chief officer of Municipal Council, Gondia. This amounts to unlawful acquisition of land without following statutory procedure and without payment of compensation to the owner. This is violative of guarantee provided under Article 300 - A of the Constitution of India that no private land will be acquired without the procedure established under a Statute and without payment of compensation. Recently, it has been held by Hon'ble Mumbai High Court that construction of road on private property without obtaining NOC of the owner or without acquisition is illegal and bad in Law.

- VB Selar Vs Goa. (2023).6. M L J.210.

K) Chief Officer of MC, Gondia however exceeded his jurisdiction and exercised it for extraneous purpose of construction of road within open space and within private land of individual without acquisition thereof. The powers & duties of Chief Officer prescribed u/s 77 of MM Act, 1965 does not authorize him to construct road within the statutory open space and within the private land. In doing so, he wasted municipal funds on matter not authorized by the Statute.

L) **Good faith lacking:** - The Chief Officer of Municipal Council, Gondia first of all himself committed offence by illegally constructing road within the statutory open space & within private land and secondly abused his powers in registering FIR against the land - owner. It has not approached for filing FIR with clean hands.

In a different context, it has been held by Hon'ble Supreme Court of India: " Para - 259: The rules of natural justice being founded on principles of fairness can be available only to a party which has itself been fair & therefore deserves to be treated fairly. "

- Sahara India vs SEBI (2013).1. SCC.1

Hence, the Chief Officer of MC, Gondia is not entitled to protection of action taken under good faith against suit, prosecution or other legal proceedings as envisaged u/s 147 of MR & TP Act, 1966. He is personally liable by piercing the veil for prosecution, penalty u/s 52 to 55 of MR & TP Act, 1966 and payment of damages to the affected person i. e. applicant owner. Additionally, the Chief Officer is liable for recovery of expenses incurred by Planning Authority on construction of road as provided u/s 57 of MR & TP Act, 1966.

Hon'ble Supreme Court of India has held: "There is no administrative order affecting rights of subjects that can legitimately claim to be impregnable guarded by a protective shield, which judicial scrutiny cannot penetrate. "

- Ameena Begum vs Telangana (2023).9. SCC.587.

k) In almost an identical matter, the MC, Gondia served a notice u/s189 (8) of MM Act r/w 52 to 556 of MR & TP Act, 1966 upon the owner of land kh. No.412 - 413/13 - 11 of Gondia on 25.9.23 alleging unlawful construction of wall by him to block the municipal road directing him to demolish it and open the road for public. It threatened to initiate police action, besides demolition if he fails to do the needful.

However, the Authority was caught on wrong foot when the respondent owner countered on 3.10.23 that the Authority itself is guilty of unlawfully constructing road within his private land without acquiring it and exceeded his jurisdiction. In doing so, he alleged that substantial municipal funds have been unlawfully wasted by the Chief Officer. He further stated that despite his land reserved in DP, Gondia for 18 meter wide proposed road, the MC, Gondia had no authority to take its possession and construct road therein without first acquiring it upon payment of compensation under The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation & Resettlement Act, 2013. In turn, the respondent owner alleged that the MC, Gondia itself is guilty of unauthorized construction of road within his land and liable for action u/s 52 to 55 of MR & TP Act, 1966. In light of the above, the notice became infructuous.

1) **Remedy to applicant owner:** - The applicant owner has twofold action to be taken as below:

- To approach the Hon'ble High Court for quashing FIR filed on behalf of MC, Gondia against him u/s 482 of Cr. PC and
- To issue a notice u/s 304 of MM Act, 1965 against the MC, Gondia and its Chief Officer in person seeking:
 - withdrawal of FIR,
 - dislodging of cement road from the open space,
 - recovery of expenses incurred by MC, Gondia for the construction of road from its Chief Officer,
 - disciplinary action and penalty upon erring officers u/Rule 5 of Maharashtra Civil Services (Discipline & Appeal) Rules, 1979 and
 - damages for unlawful use of his land and harassment by MC

Incidentally, such a notice has already been served by the applicant owner. If the request thereunder is not acceded, the applicant owner shall file a civil suit for redressal of his grievances as aforementioned.

4. Conclusion

It is a universal fact that unauthorized development is on rampant throughout the country. Time and again, various courts have held it unlawful being violative of section 52 to 56 of MR & TP Act, 1966 in Maharashtra & analogous provisions of other States and ordered demolition thereof as below:

- Pratibha Coop. Society vs Maharashtra (AIR.1991. SC.341)
- Friends colony vs Orissa (2004).8. SCC.733
- Esha Ekta Apts/ Campa Cola vs MC, Mumbai (2013).5. SCC.357
- Royal paradise vs Haryana (2006) 7. SCC.597
- KR Shenoy vs Udipi MC (1974) 2. SCC.506
- V. Gaur vs Haryana (1995) 2. SCC.577
- CB Jabalpur vs SN Awastha (1995 Supp) 4. SCC.595
- KN Khajuria vs DDA (1995) 5. SCC.341
- MI Builders vs Orissa (2004) 8. SCC.733
- Shanti sports vs Union (2009).15. SCC.705
- Priyanka Estate vs Assam (2010).2. SCC.27
- Deepak Mukharjee vs Calcutta MC (2013).5. SCC.336
- Supertech Ltd vs Emerald Court Owner Resident Welfare Asso. (2021).10. SCC.1

The Planning Authority is equally amenable to the criminal proceedings for the offence of unauthorized development / construction undertaken by it in view of section 46 read with sections 52 to 55 of MR & TP Act, 1966.

Accountability

Simultaneously, the officers of the Planning Authority in default, who are found to:

- be part of abetting the offence of unauthorized development or
- have granted permission in violation of statutory provisions or
- have exceeded the jurisdiction and undertaken development in violation of statutory provisions are liable to be held personally responsible by lifting/ piercing the veil of protection of action taken in good faith. This is so with a view to punish the guilty and also to prevent recurrence thereof in future. It has been held as such relating to accountability by various courts below:
- MC Mehta vs Union of India (2006).3. SCC.399. c
- Lucknow Development Authority vs MK Gupta: 2 (1994).1. SCC.243
- Gaziabad Development Authority Vs Balbir Singh (2004).5. SCC.65

Sum Up: - While the need for persons to remain within the confines of Law cannot be overemphasized, it is equally necessary that the Planning Authorities too abides by the statutory provisions relating to development works undertaken by it as the said set of rules applies to Planning Authorities as well. The natural corollary of transgressing above limit by either party attracts criminal proceedings.

It is however equally true that the persons found guilty of above offence cannot plead negative equality. In other words, the persons cannot justify unauthorized development on the ground that similar unauthorized development has been

undertaken by the Planning Authority as well somewhere else.

5. Keywords

A) Development: - Section 2 (7) of MR & TP Act, 1966 defines development as carrying out building, engineering or mining operation in or over or under land, alterations, demolition of any building or part thereof and includes layout or subdivision of land or change of user of the land. Hence, laying of road or construction of road, drains etc. too constitute development and is amenable to the provisions of MR & TP Act, 1966 as well as DC Rules framed thereunder for the purposes of securing permission from the Planning Authority. Failure to do so i. e. to do any development without the express or deemed permission of the Planning Authority attracts prosecution and penalty u/s 52 to 55 of MR & TP Act, 1966.

B) Unauthorized Development: - Literally speaking, unauthorized means anything requiring express permission of the Planning Authority is done without such a permission. However, combined reading of the several provisions of the Act (e. g. first proviso to section 45 of MR & TP Act, 1966) as well as DC Rules (e. g. UDCPR No.5.1.3) makes it evident that any development undertaken on the basis of **invalid** permission (i. e. permission in violation of Statutory provisions) of the Planning Authority too constitutes an offence of unauthorized development.

It is indeed true that section 46 of MR & TP Act, 1966 prescribes that the Planning Authority shall abide by the provisions of DP and DC Rules for grant of permission. But section 46 does not absolve the persons undertaking development work from their responsibility to ensure that the development proposal submitted by them is in conformity with the DP and DC Rules.

A plea was taken by the affected flat owners (whose flats were ordered by Supreme Court to be demolished being in excess of FSI) before the Supreme Court of India that they were misled by the permission granted by the Authority and were not competent enough to read that the permission was received by the builder in violation of DC Rules. Hon'ble Court however, rejecting their plea, held that the flat owners nonetheless were capable enough to obtain expert advise from the competent professional as to validity or otherwise of the said permission. Their failure to do so will not prevent the unauthorized flats to be demolished. It however held that the affected flat owners will be entitled for compensation from the erring builder.

Pratibha Cooperative Society vs Maharashtra (AIR.1991. SC - 341)

In a nut shell, the owners and building consultants must ensure that the proposal for development / construction intended to be undertaken by them is in conformity with DP and DC Rules. Otherwise, development undertaken even based upon (invalid) permission from the Planning Authority is liable to be treated as "unauthorized" if it violates statutory provisions and will attract penal consequences.

C) **Cognizable offence:** The offence of unauthorized development u/s 52 to 55 of MR & TP Act, 1966 has been made “cognizable” and non - bailable by virtue of part II of First Schedule of Criminal Procedure Code, 1973 by Government of Maharashtra vide Maharashtra Act no.31 of 1983 and police can take cognizance of it by registering First Information Report against the persons responsible of unauthorized development. It is to be noted that not only the owners and architects, even the chief officer and town planner of the Planning Authority too can be named as accused u/s 52 of MR & TP Act, 1966 r/w sections 119, 217 & 34 of Indian Penal Code, 1860 for undertaking or permitting development in violation of provisions of DP or DC Rules.

D) **Good faith:** - Almost all the Statutes provides the provision relating to protection of action taken in good faith (like section 147 of MR & TP Act, 1966 or section 303 of MM Act, 1965) by the officers of the statutory Authority from the suits, prosecution or other legal action for the work done by them in their official capacity so that they can work fearlessly. In such an event, no action can lie upon them even if the work done by them resulted into injury or loss to others. However, such an immunity presupposes that the said person acting on behalf of the Authority:

- has done the work in exercise of jurisdiction vested upon him by the Statute or
- has not exceeded his jurisdiction or
- has not exercised jurisdiction which has not been vested in him.

But if he is found to be guilty of above, then he is no longer entitled to the immunity of good faith and the veil or protection of good faith can be pierced. In such an event, the officer in default becomes personally liable for suit, prosecution, other legal action and damages as the case may be.

Abbreviations

- AOP = Association of persons / residents of layout
- DP = Development Plan; published or sanctioned
- DC Rules = Building Byelaws & Development Control Rules
- Development = Development of land &/or construction of building
- MC = Municipal Council
- OS = Statutory recreational Open Space of sanctioned layout.
- PA = Planning Authority like Gram Panchayat, MC, Devp. Authority
- r/w = read with
- u/s = Under section
- UDCPR = Unified Development Control & Promotional Regulations.

References

- [1] For further details and Statutory Provisions, refer to the book by the same author entitling: “ **Encyclopaedia of Land Laws with Court Judgments: A Ready Reckoner for Architects, Civil Engineers, Valuers, Supervisors, Builders, Developers & Building Consultants**”, [ISBN:

978 93 5566 177 7] which is available on Amazon as well.

- [2] Maharashtra Regional & Town Planning Act, 1966.
 [3] Maharashtra Municipal Councils, Nagar Panchayats & Industrial Townships Act, 1965.
 [4] Maharashtra Civil Services (Discipline & Appeal) Rules, 1979
 [5] Judgments of Hon’ble Supreme Court of India & High Courts.