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Ref. No. MCHI/PRES/19-20/138

February 26, 2020

To,
Shri Anil Diggikar (I.A.S)
Principal Secretary (Environment)
Government of Maharashtra
Mantralaya, Mumbai - 400 032

26/02/20
लिपिक
प्रधान सचिव कार्यालय
पर्यावरण विभाग, मंत्रालय, मुंबई

Sub: Request to grant Environment Clearance on Conceptual Plan

Ref: 1) Notification issued by MoEF dtd. 22nd August, 2013 (Annx 1)
2) Office Memorandum issued by MoEF dated 20 April 2018 (Annx 2)

Dear Sir,

Our plea is that the environmental clearance should be granted on the basis of maximum possible potential (conceptual plan) which a developer is likely to get on a plot. As per the act conceptual plan with full potential should be considered as per para 3(b)(i) in the office memorandum requirement. (OM Attached)

- i. *For building/construction projects (item 8 of the Schedule), in the prescribed Form-I given in Appendix I, along with Supplementary Form 1A as given in Appendix II, as prescribed in EIA Notification, 2006 and a copy of the detailed conceptual plain;*

As per Act, Conceptual plan with full potential should be considered at once. This will ensure provision of environmental norms for worst case scenario and avoid repetition of submissions for EC. Hence, our request is that the approved plan from local authority (IOD) should not be insisted and appraisal shall be done on purely environmental parameters. Even RERA Act mandates project declaration & registration for full potential (approved & proposed).

Hence, we would like to request you to take the cognizance of the MoEF & CC Notification issued on 22 Aug 2013 & the OM issued on 20th April 2018 to issue the necessary directions with clarifications to the SEAC to accept the project as per the earlier practice with full potential before insisting for the IOD (Intimation of Disapproval).

Also, we had created standard format for Expert Committee Presentation. This Format is as per Office Memorandum & Notifications issued by MoEF, which parameters and compliance terms of reference required to be appraised by Expert Committee. The Format is attached with this letter for kind approval and consideration (Annx 3).

We wish to state that one of the holding principle of Ease of Doing Business is that, whatever permissions, remarks, NOCs that one can get simultaneously. Ease of Doing Business encouraged by Government of India, Government of

Maharashtra all the Local Authorities promotes such kind of simultaneous approvals.

Sir, we request you to please consider this and start granting environmental clearance based on Conceptual Plan, subject to an undertaking by project proponent that in case there is any change, in the conceptual plan more than 10%, then we will apply for modified environmental clearance.

Thanking you,

Yours faithfully,
For CREDAI-MCHI



Nayan A. Shah
President



Bandish Ajmera
Hon. Secretary