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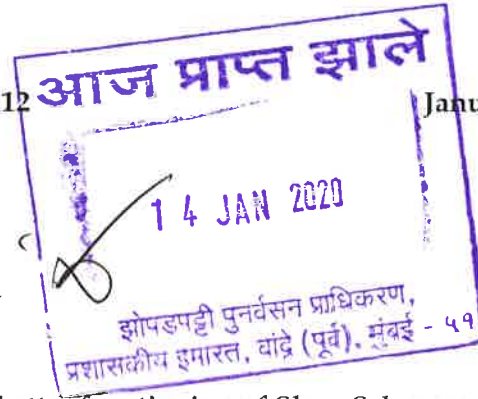
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Ref. No. MCHI/PRES/19-20/112

To,
Shri Deepak Kapoor (I.A.S.)
Chief Executive Officer
Slum Rehabilitation Authority
Bandra (E), Mumbai - 400051



January 14, 2020

Sub: Issues to consider for better functioning of Slum Schemes

Respected Sir,

At the outset we would like to express our gratitude and appreciation of your pro-active approach to ensure the smooth completion of rehabilitation schemes. We appreciate your efforts of aligning the goals of our city with the nation's target of 'Housing for All.' We would like to invite the attention of your learned self to the following points which we believe may help in better implementation of Slum Rehabilitation Schemes.

1. **Bank Guarantee for Schemes on Government & Private Schemes:** SRA has, vide circular no 188 dated 28th September 2018, reduced the bank guarantee amount for government lands to 2% and private lands to 4%. The circular however is silent on the applicability to the schemes which consists a combination of both the government and the private land.

We request to allow us to submit fresh bank guarantees on the basis of proportionate nos. of slum dwellers on private and government slum lands in the schemes. Bank Guarantees that are submitted in the past should be returned accordingly. Further Bank Guarantees from all reputed banks including foreign banks should be acceptable.
2. **Charging of Infrastructure Cost:** The State Government has, vide its directives under section 154 of MRTP Act, waived off Development Cess under Regulation 30 and various other regulations of DCPR 2034. Similar setoff requested to be granted for Infrastructure cost applicable under sub clause 9.2 of Regulation 33(10) of DCPR 2034 to be recovered by SRA.
3. **Change of Developer Premium:** In case of projects under Regulation 33(14) (D) of DCR 1991 and Regulation 33(11) of DCPR 2034 proposals are on lands having no obligation in respective of slum dwellers. Projects are proposed by developers on land under Development Agreement with the owners as there are few obligations an deferred payments. Once these obligations are completed such lands are conveyed by paying requisite stamp duty as levied by the State Government. In case of change of developer, the same is also done by paying government levies.


Stamp Duty for Joint development and conveyance are equivalent. Hence we request that you at least in the cases where developer has paid government Stamp duty equivalent to land transfer not levy Change of developer transfer fees as collected by SRA. This will ease additional burden and facilitate the developers to come forth and join the mission of Housing for All.

4. Fast Track window for conversions of schemes from DCR 1991 to DCPR 2034.
Request is to set up a dedicated channel for approval of schemes which do not have any change in number of tenements to facilitate speedy approval of revised LOI's under DCPR 2034. This will encourage conversion of 269 Sq. ft tenements to 300 Sq. ft tenements in on-ongoing schemes.
5. Land Premium: Land Premium is payable in stages viz. 15% at LOI, 25% at rehab IOA and 30% at first sale CC and remaining 30% proportionate to further sale CC. In cases of large schemes, the project is developed in phases and all approvals are taken in stages. Our request is in order to ease out the cash flow, the land premium should be charged proportionate to the BUA for which the particular approval is sought. The 25% payable at rehab IOA should be made pro-rata to rehab BUA CC taken rather than at one go. Similarly, 60% should be made pro-rata to sale BUA CC.
6. Fungible Compensatory Area While offering deferred payment for fungible Compensatory Area, our request is to hold approvals only to the extent of such Fungible area rather than the entire permissible Area.

We request your kind consideration towards the same.

Thanking you,

Yours Sincerely,
For CREDAI-MCHI


Nayan A. Shah
President


Bandish Ajmera
Hon. Secretary