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Ref. No. MCHI/PRES/18-19/391

August 1, 2019

To,
Hon'ble Shri Narendra Modi
Prime Minister
Government of India
152, South Block,
Raisina Hill,
New Delhi-110011

Sub: CREDAI-MCHI's Suggestions on Hon'ble Prime Minister's speech for 15th August 2019

Respected Sir,

Confederation of Real Estate Developer's Associations of India (CREDAI) is the apex organization representing 12,000 developers across 23 states and 189 cities. CREDAI members are active partners of Government in the mission of **Housing for All by 2022**. Over one million affordable housing units have been launched by CREDAI members since April 2017.

Further, Maharashtra Chamber of Housing Industry (MCHI), a founder member of Confederation of Real Estate Developers' Association of India (CREDAI), is a recognized association with its 1200+ Developer members providing the majority of the housing (exceeding 90%) in and around the Mumbai Metropolitan Region (MMR). MCHI is well known for initiating and successfully espousing the cause of its members at various forums, Government, Urban Local bodies, etc.

On behalf of CREDAI-MCHI, please accept our heartiest congratulations on earning an unprecedented mandate for a second term in the running. As an industry, we are sure that this term shall be even more impact making. As a pre-cursor, you have requested inputs from the public at large for your Independence Day Speech, a step that no other Prime Minister of independent India has ever done in the past. Sir, what a wat to personify your motto of *"Sabka Saath, Sabka Vishwas"*.

Sir, on behalf of more than 1200 developer members of CREDAI-MCHI, we would like to re-emphasize our resolve and support to make Housing for All a reality by 2022, which has been your humble dream. We also take this opportunity to present below some of our humble submissions for your Independence Day Speech for your kind perusal and consideration.

1. In order to make homes affordable and to realize the dream of Housing for All by 2022, it is of utmost important that the liquidity issues and business viability by reducing premiums by 50% in metros like Mumbai are immediately addressed.

2. Permitting PMAY Scheme in PPP mode on all kinds of land, including Special Development Zone (SDZ).
3. In order to aid the fulfilment of the dream of Housing for All by 2022, home loans to be made available to home buyers at 7.5%.
4. Certain issues under EODB that require immediate attention and Redressal.
 - (A) **Civil Aviation:** New GSR-751 (E) whose drafts was published on 12th April 2018 to be approved and notified at the earliest.
 - (B) **Environment**
 - Zero draft of the EIA Notification 2019 dated 15th April 2019 to be implemented, including amendment to EIA Notification 2006 to be carried out for enhancement of built-up area from 20,000 sq. mtrs. to 50,000 sq. mtrs. Implementation of 1.5 lakhs sq mtrs at Municipal Corporation level / Urban Local Bodies (SLP pending in Supreme court to be expedited)
 - MOEF and CRZ clearance for the entire plot potential should be granted on the basis of conceptual plans
 - MOEF clearance at State Government level is granted after approval by two committees i.e. SEAC and SEIAA. However, at Central Government level MOEF Clearance is granted after approval by only one Committee i.e. Expert Appraisal Committee. Under Ease of Doing Business at the State Level both the Committee should be merged and MOEF and CRZ Clearance should be granted after appraisal by merged single Committee.
 - Validity of environment NOC should be till the completion of the project unless there is substantial change in features of the project. Minor modifications (height, size of the tenement, product mix users etc.) by the project proponent which does not change to the extent of 10% in the environment parameters, no revised NOC to be insisted upon.
 - (C) **Defence Establishments**
 - Streamlining and Easing the process of issuance of NOC for the projects in the vicinity of Defence Establishments in the city of Mumbai, and the same to done in a time bound manner.
 - (D) **Railways**
 - Streamlining the Railway NOC/ Clearance's with respect to building approval in the city of Mumbai.

(E) RERA

- All approving authorities (Local, State, Central, including their departments) to be covered under RERA. Section 32, RERA ACT, 2016

5. Forum shopping should stop

6. Dramatically reduce litigation by Government

We thank you for having given us this opportunity to put across pointers for your Independence Day Speech.

Thanking you,

Your sincerely,
For CREDAI-MCHI



Nayan A. Shah
President



Bandish Ajmera
Hon. Secretary



Sanjiv S. Chaudhary MRICS
Chief Operating Officer