



Gopal Shetty

MEMBER OF PARLIAMENT
(North Mumbai)

Date :- 10/04/2015

Ref.: **The Urban Land (Ceiling & Regulation) Act, 1976 ("Principal Act")
alongwith The Urban Land (Ceiling & Regulation) Repeal Act, 1999.**

- Sub.: (i) Goal of Prime Minister, Shri Narendra Modiji of "Housing for All" by 2022.
- (ii) Urgent need for clear and immediate directions to be given by the Government in respect of housing projects affected by the ULC Act to fulfil the goal of "Housing for All" by 2022.
- (iii) Stalling of Large Scale Lands capable of providing affordable housing projects in Mumbai, MMR, and the entire Maharashtra.

Respected Sir,

1. The Hon'ble Prime Minister in his Election Manifesto had openly declared that Housing for All becomes a reality by the year 2022 that is when India complete 75 years of its independence. The programme was also mentioned in the President's Address to Parliament in June 2014 where he said *"By the time the nation completes 75 years of its Independence, every family will have a pucca house with water connection, toilet facilities, 24x7 electricity supply and access."* The same commitment was made in the Budget for 2014-15 where the Finance Minister had announced Housing for All programme. The Finance Minister had said *"Our government is committed to endeavour to have housing for all by 2022. For this purpose, I intend to extend additional tax incentive on home loans to encourage people, especially the young, to own houses. I propose setting up a Mission on Low Cost Affordable Housing which will be anchored in the National Housing Bank. Schemes will be evolved to incentivize the development of low cost affordable housing."*
2. The Prime Minister has declared the "Housing for All" by 2022 mission as one of the priority commitments of the Government and he has been actively reviewing



the progress of the Mission and has been taking periodic review meetings for finalising the contours of the "Housing for All" by 2022 mission.

3. In this regard, I must compliment you for having convened a two day conference at Nagpur on 21st & 22nd February 2015. I believe that you are making brilliant efforts to make Affordable Housing for All a reality in Maharashtra, especially in MMR and in Mumbai. I am sure your effort will bear fruits.
4. Already a lot of changes have come due to the efforts taken by our Government.
5. This representation is on the specific issue of resolving the issues created due to the Urban Land Ceiling & Regulation Act 1976 being implemented by the Government despite it being scrapped in the year 1999 i.e., even after 16 years have being scrapped it still continues to haunt the public and us.

6. **SCRAPPING OF THE ULC ACT BY BHARATRATNA SHRI ATAL BIHARI VAJPAYEEJI IN THE YEAR 1999**

- (a) Recently I have received many complaints from various developers in Mumbai, Mira-Bhayander, Thane, and other parts of Maharashtra about the fact that inspite of the Urban Land Ceiling Act, 1976 being **scrapped** in the year 2007, the Government is now implementing the ULC Act, 1976 taking the benefit of a Bombay High Court Full Bench judgement delivered in the matter on 3rd September 2014 which itself was a split judgement and which is challenged in the Supreme Court and the SLP is pending in the Supreme Court and the Supreme Court has passed interim Orders on 10th November 2014 that **"No coercive steps to be taken in the meanwhile"**.
- (b) At this juncture, I would like to mention and I am sure you are also aware of the same that the Urban Land Ceiling & Regulation Act, 1976 (ULC Act) was scrapped under the dynamic and able leadership of **Bharatratna Shri Atal Bihari Vajpayeeji in the year 1999** by introducing The Urban Land (Ceiling & Regulation) Repeal Act, 1999. The State Legislature



passed Resolution on 28th November, 2007 thereby consenting for Repeal Act in its application to the State of Maharashtra.

- (c) At any point of time, it was never the intention of the Government to implement the ULC Act once it was scrapped and if the present Government is implementing the ULC Act after it is already scrapped then it is not proper and the present Government needs to respect and implement the scrapping of the ULC Act in letter and spirit and not do any act which are against it. This was never the political agenda of the Bharat Ratna Atal Bihari Vajpayee Government that the ULC Act would be implemented the way it is happening today.
- (d) One very peculiar anomaly which is brought to my notice is that as on the date of scrapping of Act for e.g., if there was a land owner whose land was surplus but was not exempted u/s.20 of the ULC Act then that land owner today continues to be out of the purview of the ULC Act, but those land owners who had an exemption order irrespective of whether they started the development after the date of the scrapping of the Act, they continue to be in the purview of the ULC Act. This in effect means that a person having a higher anomaly is out of the ULC Act whereas a person who was complaint to the provisions of the ULC Act as it existed then, are, even after scrapping of the ULC Act are being harassed and haunted. This can never be the intent of any Government and this can never be the intent of this Government. This anomaly needs to be set right immediately by this Government.

7. **WHAT IS THE ISSUE / PROBLEM / DISPUTE WITH GOVERNMENT :**

- (a) Basically, since the date of the scrapping of the ULC Act in the year 2007 and until now, Land Owners have considered that the ULC Act is scrapped in its entirety and hence they can deal with the development of the Land the way they decide as per the provisions of the respective D C Regulations prevailing from time to time.



- (b) Whereas the Government was holding to a view that Lands which are exempted under Sec 20 of the ULC Act is saved and to such lands the ULC Act continues to apply in its entirety even after the Repeal of the ULC Act.
- (c) As a result of this anomaly, the Government, the bureaucracy and its officers at the lower level continue to act under the Principal Act though there are no powers vested in them after the Repeal Act. Government can only act under the Principal Act for the purpose of Sections 11, 12, 13 and 14. In spite of the same, Government and their officers are hell-bent to enforce the Principal Act by threatening illegal actions like;
- i. If the land owner wants to have his scheme being developed as a Rental Housing Scheme and/or as a Affordable Housing Scheme, he has to apply to the ULC Department and seek its NOC and the decision never comes.
 - ii. Handing over of 5% tenements to be sold to Government Nominee are insisted upon
 - iii. Condition of sale of the flats like Rate etc are being insisted upon
 - iv. Demand Penalty for granting extension of time of Exemption Order.
 - v. Demanding Penalty for non-filing of six monthly progress report.
 - vi. Demanding premium for utilization of TDRs / Fungible FSI etc.
 - vii. Ordering to the Sub-Registrar to stop the registration of the documents;
 - viii. Ordering and giving written directives to the Municipal Authorities / Planning Authorities not to grant the development permission and / or any other permission or if the building is under completion then not to grant Occupation / Competition Certificate;
 - ix. Forcing to take No Objection Certificate from Competent Authority under Principal Act before grant of development permission when there is not Competent Authority after Repeal Act;
 - x. Threatening to prosecute by Criminal Action etc.



- (d) In the meanwhile the various developers went ahead with their projects, ignoring the exemption order, ignoring the terms and conditions because the perception was that since the Act is Scrapped the Exemption Order, is not applicable. Many Developers have also taken written legal opinion from top lawyers and even they have been saying that the ULC Act is being scrapped and as such this is not applicable. Basically the land owner who acted with proper legal opinion that the Act is scrapped and they could develop today, today they are stuck , this is pure mistake of the Government. You cannot blame the land owner and the developers for this.
- (e) As a result of this for e.g., people in the entire Mumbai Metropolitan Region (MMR) and Maharashtra have went ahead and
- xi. transferred their land,
 - xii. started development as per the D.C. Regulations
 - xiii. Started selling the flats / tenements,
 - xiv. Some of them did not adhere to the tenement size restriction since they assumed that they have to develop only as per D.C. Regulations and whatever D. C. Regulation was permitting they have planned.
- (f) In the meanwhile very recently the ULC Department has started [after the high court judgment] about enforcing the ULC Act in a very strict manner stating that they will enforce every terms and conditions but since the ULC Act is scrapped they would not give the benefit to the Land Owner for the rights which he had if the ULC Act was surviving. As a result of this all other rights of a land owner that were made available to him, like re calculating the surplus vacant land simultaneously with the development is not being made available, the benefit of existing built up structures on the land, the absence of access road to the land, the power to compute and recalculate the surplus vacant land and pass corrigendum orders are all taken away from the Developer and simultaneously to this the ULC Department is enforcing every term and condition of the Exemption Order which in itself is bad-in-law and illegal.



- (g) Earlier what used to happen was that Exemption Order u/s.20 of the ULC Act was issued as the matter of abundant caution and as a matter of taking a NOC of the ULC Department for the purpose of development for taking other developmental permissions from the Municipal authorities etc. While the development was going along the land owner/developer would get his the net surplus vacant land determined, hence by the time the Development has substantially progressed the net surplus vacant land area is determined, corrigendum order mentioning the area is issued, and the grant of government nominee flats etc. would then become a finality. However, what has happened is once the Act got scrapped, all those land owners/developers who had exemption orders, were not able to get corrigendum to the exemption order that they had. As a result of which the status of the land continues to be surplus and they are not able to take any benefit of final determination of the surplus vacant land that is being developed.
- (h) The Lower Level Government Officers are also interpreting the various clarifications issued by the Government in a very narrow manner and benefit given to some person on some issue is not being given to others. This is again not proper and leads to litigation and stalling of projects.
- (i) There are many projects / buildings which are developed are Composite buildings where only part of the total tenements are attributable to the Land affected by the provisions of ULC Act and the balance tenements are constructed by use of TDR FSI, Premium FSI which as per Government G.R. itself are not affected by ULC Act. Even in these cases the whole development is made to wait and stalled for its completion certificate / occupation certificate.
- (j) All these issues, over a period of time became a subject matter of litigation between the Land Owners and the Government and very recently the Hon'ble High Court of Judicature at Bombay gave a different view which was the split judgment. So, the issue of scrapping of the ULC Act in its entirety or not is a debatable issue.



(k) The split Bombay High Court Judgment is challenged in the Supreme Court and the SLP is pending in the Supreme Court and the Supreme Court has passed interim Orders **“No coercive steps to be taken in the meanwhile”**.

(l) So, there is a genuine dispute that is created today.

8. **GOVERNMENT NOMINEE FLATS - DISPUTE WITH GOVERNMENT – PROSPECTIVE V/S RETROSPECTIVE :**

(a) Then other connected issue is the handover of 5% flats to the Government Nominees Flats in schemes which have been granted exemption order under Sec 20 of the ULC Act.

(b) Now, in case of development of Lands which are reserved for accommodation reservation like Public Housing, Housing the Dishoused, Public Housing / High Density Housing (PH/HDH), the Government policy was very clear that no flats are to be handed over to the Government Nominee and instead it has to be developed under the D C Regulations and flats to be handed over to the Municipal Corporations free of cost. The Government also published a GR dated 9/4/2001 to this effect.

(c) However just few days before the Repeal of the ULC Act in the year 2007, the Government suddenly decided to take additional government nominees flat in such cases. Now it is a very basic principle that any change in law has to be done prospectively and in the past the Government has acted on various Supreme Court judgments on prospective implementation of change of law but in these cases, the Government is implementing the orders retrospectively and as such the people are again stuck on this.

(d) So, there is a genuine dispute that is created today.

(e) In any case handing over flats to the Government Nominees has become completely politicized and Favoritism creeps in and all types of illegalities and corruption is practiced for allotment of these flats.



- (f) Exercising the powers under the ULC Act after its Repeal amounts to we are exercising it retrospectively which is against the policy of this Government.

9. POLICY PARALYSIS - Lower Level Government Officers / Bureaucracy / Government

- (a) Whereas the lower level staff says that we will collect penalty, we will collect TDR premium, we will take over Government Nominee Flats, we will do this, they are strictly following the conditions of the exemption order.
- (b) The lower level staff is worried and fears that if they don't act as per the exemption order and if they take a view not to act because they don't have powers as per the ULC Repeal Act then tomorrow if there is a complaint against the Government Officers for not acting and that they are going beyond their brief by not acting they would be under fault. So despite Supreme Court Orders of "no coercive steps" to be taken, the Government Officers are taking all type of Coercive steps like issuing directives and orders for stopping permissions, stopping works, stopping registration of flats etc.
- (c) At the same time the Government intention is that it does not want to tackle individual cases but want to take policy decisions.
- (d) The lower officers are saying that the obligations under the exemption order need to be implemented. Over a period of time, if the land owner had any rights like advantage of built up structure, advantage of land lock land, advantage of change in the D.C.Regulation, advantage of Reservation, advantage of his surplus vacant land getting reduced, advantage of availing reduced surplus vacant land area due to handing over free of cost flats to the planning authority. All these advantages are not being considered by the lower officers.



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- (e) Lower officers today continue to enforce the guidelines that were issued on the 22nd August 1986, and on 16th Jan.1996 and they completely ignore all clarifications that have been issued while ULC Act was in force.
- (f) The government is considering the worst of everything. How can that be? Then this they continue today despite the order of the Supreme Court, despite the order of the High Court that has been issued over a period of time.
- (g) As a result of this policy paralysis, lot of hardship is being faced by the public and the reality is that today hundreds of acres of land are stuck up for development in this particular manner.
- (h) This was never the political agenda of the Bharat Ratna Atal Bihari Vajpayee Government that the ULC Act would be implemented the way it is happening today. Even we are sure that the bureaucracy also was not thinking that the ULC Act would be implemented the way it is happening today.
- (i) So, we are caught in a kind of fate accompli situation where the lower officers cannot take the larger view and the Land Owners are stuck, hence the Government has take a policy decision and decide what to do.
- (j) So, today there are three types situations which affect the development of lands and stalling of projects due to the ULC Act inspite of the ULC Act being scrapped in the year 2007 and on which THIS GOVERNMENT HAVE TO GIVE IMMEDIATE DIRECTIONS ON HOW TO DEAL WITH IT
- (i) Projects / Buildings that are under construction and the buildings are ready to occupy and are coming up for grant of Occupation Certificate / Completion Certificate which have been stalled by directions of the ULC Department to the Municipal Corporations not to grant Occupation / Completion Certificate until their further orders.



- (ii) Projects / Buildings who have all the Municipal Approvals but can't start because the ULC Department has given directions not to grant Commencement Certificates and not to register any documents.
- (iii) Projects / Buildings where people want to do housing scheme under the Affordable Housing GR, Rental Housing GR, Accommodation Reservation, Reservation like Housing for Dishoused, High Density Housing, Public Housing / High Density Housing but they can't start because the ULC has not given clearance to them.

10. SCHEMES WHICH ARE AFFORDABLE HOUSING / RENTAL HOUSING / PUBLIC HOUSING / HIGH DENSITY HOUSING ETC.

- (a) The Housing Schemes that are under Affordable Housing, Rental Housing, Development of Accommodation reservation like Library, Hospital, Dispensary. all lands that are reserved for development as Housing for Dishoused, High Density Housing, Public Housing, Public Housing / High Density Housing, EWS/LIG all these involve the following
 - (i) certain construction area to be given free of cost to the Government or to the Planning Authority
 - (ii) the development regulations for developing the affordable housing scheme, rental housing scheme, accommodation reservations like PH/HDH are already an all encompassing Regulation which even covers the provisions of the ULCR Act 1976.
 - (iii) It is developed for the larger purpose of Public Housing
 - (iv) It has a very high density of tenements
 - (v) larger number of tenements get built and
 - (vi) More families can stay because of the smaller size
 - (vii) Units become affordable because of the smaller size
 - (viii) Part of the flats are used for project affected persons and
 - (ix) Hence it is an inclusive housing concept. The inclusive housing is the main policy introduced by the Government for the larger good of the society.
- (b) THE GOVERNMENTS POLICY TOWARDS PROVIDING AFFORDABLE HOUSING BASICALLY HAS BEEN AS FOLLOWS:



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- (i) To be part of the development in one or all of the following ways:
- Premium FSI on the basis of the Ready Reckoner rate.
 - Grant of Fungible FSI on payment of premium.
 - Grant of additional FSI due to Parking on payment of premium.
 - Collecting deficiency towards the premium in condoning the deficiency in the open space.
 - Premium for exempting the FSI of the use of Staircase, Lift, Lobby.
 - Under inclusive housing to take over flats for EWS and LIG category.
- (ii) Affordable Housing schemes wherein $\frac{1}{4}^{\text{th}}$ of the land and built up area is to be handed over free of cost to the Government / local planning authority and $\frac{3}{4}^{\text{th}}$ of the area is to be allowed to be developed by the land owner for free sale.
- (iii) Rental Housing schemes wherein $\frac{1}{4}^{\text{th}}$ of the area to be handed over along with the land to MMRDA and $\frac{3}{4}^{\text{th}}$ of the area is to be allowed to be developed by the land owner for free sale.
- (iv) Redevelopment of Slums by a separate authority known as Slum Redevelopment Authority, Redevelopment of old and dilapidated housing buildings, Redevelopment of MHADA colonies by MHADA, Redevelopment of lands belonging to the Government, Public Works Department etc all basically giving additional incentive FSI to the Developer on the developer handing over rehab portion to the Government / Authority.
- (c) As such all lands which are being developed under the Affordable Housing Scheme, Rental Housing Scheme, Development of Accommodation Reservations like Library, Hospital, Dispensary, Housing for Dishoused, High Density Housing, Public Housing, Public Housing / High Density Housing, EWS/LIG etc all these in any case should be exempted from ULC Act because these developments are for the larger good of the society



and certain construction area is to be given free of cost to the Government or to the Planning Authority which covers the provisions of the ULCR Act 1976.

11. SHIFT IN GOVERNMENT THINKING FROM 1976 TO 2015 ONWARDS FOR ACHEIVING LARGER PUBLIC PURPOSE

- (a) Since 2012 when Hon Municipal Commissioner of MCGM Shri Subodh Kumar brought in the Fungible Compensatory FSI regime and also when 0.33 FSI was announced by payment of premium to the Government as per the Ready Reckoner Rates, one thing has become very clearly with the Government that by charging premium for granting FSI, FSI is granted, in SRA redevelopment, Cess building all has provisions for handing over constructed flats / areas and the rest of the land is free for development as per the D C Regulations prevailing from time to time.
- (b) Whereas the earlier policy in 1976 was to take away excess land and then Government to develop for economically weaker section. Hence earlier the view was that Government needs to acquire the land and build tenements at low cost and allot it to people
- (c) This view has completely changed into a view where, wherever there is a development of the land, the development automatically leads to a financing or contribution for the overall good of the city and overall good of the community and overall good of the state. So indirectly every development has become like a PPP model.
- (d) Also development of Naina at Navi Mumbai, because the Government is investing 1000 of crores on the development of an Airport and everything around it, the Special Planning Authority has been created wherein the land owner have been encourage to hand over 20%, 30%, 40% of their lands to Naina and retaining 60% of the lands. So this 40% lands will lead to the financing of the development of that particular region. Development of coastal road, development of Mumbai Trans Herbal Link, development



of Railways, development of new roads, development of other social education and Infrastructural facilities

- (e) Garden and open spaces to be made available to the open public
- (f) Very recently the Government has also come out with suggestions for redevelopment of the lands belonging to State Government bodies like Police, Police Housing, Social Welfare Departments, Central Government Departments, Post, Telegraphs etc. where if these Government departments want to develop their land for the sake of providing staff quarters and housing to the employees then on a PPP model the development has been allowed so on and so forth and whatever premium and funds that are collected by way of such exemptions and development, these amounts are than used towards financing infrastructure projects like the Coastal Road, the Metro, Water Supply Projects, Sewer Projects etc. In short provision of all the other infrastructure, Social education and Infrastructural facilities for the residents of the MMR Region and for the Citizens of the state.
- (g) Now the new DCR 2034 has Institutionalized the collection of premium and gathering of funds, while development is happening, base FSI has been made into 2 with everything coming into FSI and thereafter the additional 0.5 FSI, then the additional 0.5 by TDR, additional 0.5 by payment of premium of 100% of Ready Reckoner rate, so, today developments are 3.5, 5, 6.5 & 8.00 but very few projects are there who will get the entire 3.5 without premium. So, thousands of crores will be collected this will go ahead to finance Infrastructure, economically weaker section housing, then each plot over and above that, inclusive housing etc. So the larger public purpose is served.
- (h) So all areas constructed by using Premium FSI where Premium is paid to the Government /Planning authority like TDR FSI, Fungible FSI, Premium paid for Staircase, Lift, Lobby, Passage, the ULC Act as it does not apply and hence needs to be clarified to the Lower Government Officers immediately.



- (i) Government has recently decided and also announced that even illegal buildings be regularised by paying a fee. And if you see the larger law, even the death penalty over a period of time is commuted if there is delay in hanging.

12. GOVERNMENT TO ACT AND TAKE A VIEW AND MOVE FORWARD

- (a) Now one thing is very clear that the ULC act nobody wants it to remain the way it is.
- (b) But the reality is that there is a total policy paralysis because of all the factors as mentioned above.
- (c) The Government thinking has been to take premium and grant FSI and use the funds for infrastructure development, economic weaker section housing so the larger public purpose is served and release the balance land for development.
- (d) So, you need to immediately take this view.

13. PROPOSED SOLUTION FOR RELEASING STALLED PROJECTS / LANDS FOR DEVELOPMENT STUCK DUE TO THE ULC ACT

There is a solution for all lands as follows:

- (i) To immediately issue a G.R. clarifying that where there was No Commencement Certificate issued as on the date of repeal of the ULC Act viz. 29/11/2007, ULC Act automatically does not apply.
- (ii) To immediately issue a G.R. clarifying that All those land under development for a Rental Housing Scheme, Affordable Housing Scheme, EWS/LIG, Accommodation Reservations, Public Housing, High Density Housing, Housing for Dishoused, Public Housing / High



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Density Housing, all these lands are automatically exempted from the ULC Act, 1976.

- (iii) To immediately issue a reconfirmation G.R. reconfirming that "All areas constructed by using Premium FSI where Premium is paid to the Government / Planning authority like TDR FSI, Fungible FSI, Premium paid for Staircase, Lift, Lobby, Passage, no provisions of the ULC Act apply.
- (iv) All those land which do not fall into category (i) above, and these land owners / Developers want to develop the land as per the provisions of the D.C. Regulations prevailing from time to time and as per Development Plan prevailing from time to time, in those cases 10% of the Ready Reckoner value should be taken by the Government and such lands should then be exempted and they should not be called upon to give any Government nominee flats and there should not be any rate restriction on the sale of the flats constructed on such lands.
- (v) All land owners/developers should given the advantage of having their surplus vacant land determined and issuing corrigendum to the earlier orders and based on the net surplus land so determined, the 10% of the Ready Reckoner of the value of the such surplus vacant land determined and should be collected and they should not be called upon to give any Government nominee flats and there should not be any rate restriction on the sale of the flats constructed on such lands.
As also they should be directed to develop flats upto 60 mtrs carpet area only to the extent of the surplus vacant land.
- (vi) all the schemes that are stuck up, as I have mentioned in the Para 2 above due to one reason or other a detail policy should come out, everything should be cleared.
- (vii) and bring an end to this whole thing.



14. This policy decision should be made available for benefit of all schemes where construction is not started, or where construction is going on, or where construction is completed, i.e., anybody who has been affected under the ULC Act should be able to take the advantage. And thereafter the respective planning authority will ensure that the size of the flats.
15. Releasing of the ULC Act will lead to a huge supply in the housing stock and automatically Government will also earn thousands of crores of revenue by way of ;
- (i) Stamp duty, VAT, Premium for use of FSI, i.e., upto point 6 [as recently announced by you in your budget speech]
 - (ii) Use of TDR, the premium for use of Fungible FSI Open space deficiency premium, capitation fee premium, so on and so forth
 - (iii) Flats due to EWS/LIG
 - (iv) Public amenities like, Garden, which are to be compulsorily handed over, Amenities open spaces

16. **MY VIEW POINTS**

The Hon'ble Prime Minister has announced the "Housing for All" by 2022 – Mission – and believe me I got elected with one of the top 5 Loksabha margins only on this very thing, and I have to deliver the promise to my people. So I suggest as follows:

- (a) there should be an immediate arrangement of a policy where ULC Act issue is resolved once and for all,
- (b) the ULC office gets locked
- (c) And now under your dynamic leadership, Atal Bihari Vajpayeeji never wanted this ULC Act to remain in the state, we should inform the Hon'ble Supreme Court that our Government wants to withdraw the ULC Act considering that the 'Scrapping' had no intention of any "Saving", but today because of what has happened probably it may not be legally feasible or it may take a long time.



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(d) In the meanwhile you come out an immediate announcement of a policy and start implementing it and those who want to fight with the case let them fight in the Supreme Court.

17. I compliment you for the Housing for All Conference held at Nagpur on 21st & 22nd of February 2015, I understand you have already taken number of decisions, but this one thing will lead to a great development of all over Maharashtra and free up large lands for development of affordable housing and Housing for All.

Thanking you,

Yours,

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**Shri.Devendra Fadanvisji,
The Hon'ble Chief Minister,
Government of Maharashtra,
Mumbai.**

Cc:

- (1) Shri Prakash Mehta,
Cabinet Minister, Housing, Labour & Mines.
Govt. Of Maharashtra.
- (2) Shri Mr. Swadhin Kshatriya
Chief Secretary, Mantralaya, Mumbai 400 032.
- (3) Shri Nitin Kareer,
Principal Secretary, Urban Development Department, Mantralaya, 4th Floor,
Mumbai 400 032.
- (4) Dr. Dhapate, Director, Yashada
- (5) President – MCHI-Credai, Mumbai.
- (6) President – MCHI-Credai, Maharashtra.