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URAN-DRONAGIRI
ALIBAG
KARAJI-KHALAPUR-KHOPOLI

To,
Shri Satish Lokhande (I.A.S.)
Chief Executive Officer,
Slum Rehabilitation Authority,
3rd floor, Anant Kaneker Marg,
Bandra (E), Mumbai 400 051

Subject: Various issues require your attention to facilitate ease of doing business/ new policies to ease process of approvals.

Respected Sir,

At the outset, let us begin by commending you and your entire office for the admirable job that you have done during the difficult period to ensure that the SR schemes were not derailed due to the extraneous factors like the pandemic and the resulting financial crunch in the market.

The timely action and measures taken by you have been like life support to the developers. Furthermore, your policy of zero file pendency and open door approach has been appreciated by one and all.

With a view to further facilitate development we would like to bring to you the following issues which requires your intervention:

1. As per current circular CEO/SRA/6497 no.192 dated 14/05/2020 correlation of Rehab CC and Sale CC is 1:1 but only for RCC structure, wherein our request is to consider correlation 1:1 for wholesome structures as now a day for high rise buildings and to achieve Rera dates, developer use Mivan/ formwork shuttering where in columns/ slab and walls - casting together in monolithic way is more sensible.
In light of above, clarification needs to allow such type of construction without treating it a contravention of the said circular.
2. SRA has been kind enough to grant deferment of payment and government issue time to time circular to ease of heavy premiums and expedite business. Still like to bring your notice of one condition of deferment facility is restriction of 15% CC of the sale building wherein deferment is taken as per circular no. 186 dated 3rd April 2018. However, since 15% CC is restricted, hence the developer is unable to cast slab for lift machine room / water tank, terrace waterproofing etc.
In view of above, it's our request to allow full construction of building till top of terrace and restrict any type of O.C. of building till full payment of premium receive.
3. As per government notification dated 16th May 2018, the compensation to be paid by "paid eligible" has been decided by government of Maharashtra earlier and it has been set at 2,50,000/-. The same should be put in motion as there are thousands of tenants who have been made eligible as per the said 2018 GR but cannot be allotted permanent alternate accommodation as the compensation has not been crystalized.
4. The SRA has formulated a policy to bring stuck projects on track through various initiatives and interventions which is highly appreciated. In the same vein, the change of developer premium as per office order dated SRA/CO/OFFICE ORDER/9/2015 dated 23rd March 2015, which is 5% of 50% of sale value as per RR needs to be withdrawn as the same is prohibitive for strategic partnerships needed to complete projects.

Maharashtra Chamber of Housing Industry

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Approved
13/04/2022
P. A. to
Chief Executive Officer,
Slum Rehabilitation Authority

5. Increase the number of Tehsildars as the process of demolition/evacuation which is overseen by the said office is being delayed which is leading to slowing down the progress of schemes. The process of declaration of slum rehabilitation area under 3C of the slum Act. needs to be streamlined if further possible.
6. As per the circular no. 196, dated 27nd Jan 2021 and 26th April 2021 with respect to 3C process of declaration of slum, we have request to ease/ stream line process if further possible.
7. Request to streamline blackmailers and complainant handling process and or only genuine complaints made by persons with specific reasons then only entertain. After compliant filed by developer for any black mailers on site, SRA can entertain though person with specific fees so once can avoid unnecessary paper work etc. The complainants make frivolous complaints without any substance and waste the time of officers and the office machinery to further their illegal aims. Further, we also request that no detrimental order should be passed which may hamper the completion of the projects.
8. Also, need to finalized stamp duty on lease deed and agreement and lease which is very beneficial to developer to take loan and land to expedite project. As per our view, it should be minimum like 0.05% so can comfortably execute documents.
9. Condition of NA of plot imposed on developer in particularly government of land under 33(10), is very costly in bigger layout so, request to stream line this process/ avoid process or intimate land owning authority only through SRA will be more feasible.
10. Premiums like infrastructure charges, should be charge after obtaining of approvals of base FSI of sale building.
11. Previously during round table discussion, it was decided about creation of special protection force for demolition but the same has not come to fruition. As a lot of time and energy is expended in getting police protection. Every request for grant of protection is sent up to CP office for approval and the said process sometimes takes longer than the days available between notice and demolition. Many demolitions are delayed due to want of police protection.
12. No chance for Developer to show cause when SRA is exercising its powers under MRTP for Stop Work or staying development in scheme. Provision specifically mentions show cause notice must be given before actual stop work. Further only after hearing / submissions from both parties can stop work notice be issued.
13. On obtaining Occupation for PTC Rehab buildings that SRA - Estate department take over PTC units and then may allocate to the competent authority. Our sale Occupations are being held up since SPPL have separate compliance even after obtaining occupation.
14. Since DCPR 2034 is now fully in force there ought to be no need for the DDTP department NOC for projects less than 50000 meters as was the case under circular no. 144 originally. Since there is no ambiguity in DP 2034 or 1991 the same NOC may not be insisted unless sectorial planning is needed.

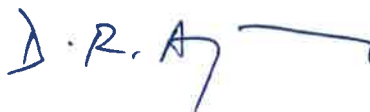
We hope that our above submission will be considered and accordingly necessary positive action will be taken in this regard.

Thanking You and looking forward to your continuous support.

Yours faithfully,
For CREDAI-MCHI



Boman Irani
President



Dhaval Ajmera
Hon. Secretary