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To  
Shri Gopal Shetty,  
Hon'ble Member of Parliament,  
Lokmanya Tilak Nagar, Poisar,  
Gymkhana Marg, Kandivali – West,  
Mumbai - 400067

**M. P. GOPAL SHETTY**  
Date: 24.11.22 Time: 10.40 AM  
Public Relation Office  
Sign.: Chs

**Subject: - Requesting your intervention in pressing for resolution of issues relating to grant of environment clearances to construction projects in Mumbai**

Respected Sir,

As the Hon'ble Member of Parliament, you are well aware that the city of Mumbai is in the midst of a massive redevelopment drive. The need for upgradation of civic amenities like roads, open spaces, etc also put greater levels of impetus on ensuring timely completion of construction projects. Through this representation, we would like to highlight some pressing issues related to grant of environment clearances to construction projects which need your urgent intervention: -

1. **Relaxation in environment clearance norms applicable for redevelopment projects**

Majority of construction projects in the city of Mumbai involve redevelopment of society buildings and slums wherein additional FSI is available as per DCPR-2034 regulations. These projects involve rehabilitation of existing occupiers and additional development of free sale units to recover the project costs, due to which Permissible FSI and resultant density in these projects is on higher side. Further, in order to fulfil social housing requirements and create stock of affordable housing, various regulations permit grant of additional FSI upon construction and handover of social housing tenements on free of cost basis to the concerned local town planning authority. It is suggested that projects which involve redevelopment and/or rehabilitation of existing occupiers (including slums) and fulfilment of social housing obligations be appraised based on relaxed scheme parameters and given priority in grant of environment clearances.

It is also noticed that during appraisal of construction projects, members of appraisal and impact assessment committees tend to review parameters and give their suggestions on matters which are in deviation to the provisions as contained in the town planning regulations. This process leads to unwarranted modifications in approvals granted by the town planning authorities. Case in point is the width of driveway permissible for grant of stack car parking or mechanized car parking approvals. While the town planning requirements allow such parking to be provided with 6mtrs driveway, many environment approvals necessitate providing 7.5 mtrs driveway. Similarly, the members of environment committees opine on provisions relating to fire fighting requirements, traffic requirements, etc which are otherwise captured in the town planning regulations and scrutinized by the concerned approving authorities in great detail before granting their respective permissions. Such deliberations/recommendations lead to duplicity of efforts in project planning leading to increased dishoused compensation to existing occupiers, enhancement of project costs and reduced viability of redevelopment projects, which is need of the hour in densely constructed places like Mumbai.

**Maharashtra Chamber of Housing Industry**

Maker Bhavan II, 4<sup>th</sup> Floor, 18, V. Thackersey Marg, New Marine Lines, Mumbai - 400 020,  
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On a holistic basis, it is suggested that continuous interactions between the concerned stakeholders be held regularly to work out comprehensive guidelines and advisories that need to be considered by the environment appraisal and impact assessment committees for grant of environmental clearances.

**2. Requirement of Certified Compliance Report (CCR) RO visit in accordance with MoEF OM dated 8<sup>th</sup> June 2022. F. No. IA3-22/10/2022-IA.III [E 177258]**

The Integrated Regional Officer (IRO) in-charge of issuing such CCR for Maharashtra (along with few other states) is in Nagpur. Most of our members are applying for IRO visit well in advance but the IRO visits for obtaining CCR is not happening within stipulated 1-month period. No other alternate mechanisms or remedies to this delay is available to our members. We request you to please vest power of issuing CCR to Subregional officer (SRO) of MPCB as this would reduce the pendency to a great extent.

**3. Recent judgement of National Green Tribunal Special Bench on appeal number 22/2016(WZ) and 23/2016 etc and scope of appraisal**

It was observed by the NGT, who in turn cited Hon Supreme Court order of 2015, that recreational space should be provided on ground. The said judgment has been made applicable to all the ongoing projects. However, the said judgment is only applicable / was applicable for the developments which was being carried out under the then prevailing DCR regulations within the municipal limits of Greater Mumbai. Considering the fact that the new regulation of DCPR 2034 has come into effect from May 2018, we hereby request your immediate intervention in this matter and issue specific directives to SEAC and SEIAA in this regard. This clarity is of outmost importance as this stand of SEAC and SEIAA does not become detrimental to the ongoing projects requiring environment clearance.

We are very sure that with your intervention we will be able to quickly resolve all these issues and looking forward to an in-person interaction on these issues.

Thanking you for your continuous support.

Yours faithfully,  
For CREDAI-MCHI

  
Boman Irani  
President

  
Dhaval Ajmera  
Hon. Secretary