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Naman Shah

**PROCUREMENT CONVENOR**  
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Sejal Goradia

To,  
✓ **Shri. Aseem Kumar Gupta (I.A.S.),**  
Additional Chief Secretary UD [1], Dept.,  
Government of Maharashtra,  
Mantralaya, Mumbai.

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28/07/23

लिपिक

अ.मु.स. (नवि-१)

नगर विकास विभाग  
महाराष्ट्र शासन, मंत्रालय,  
मुंबई - ४०० ८३९.

**Subject: Request to add a clause in Regulation 33(12) to Allow PAP Handover within 5 KM or Adjacent Ward in any scheme or in any regulation of DCPR 2034.**

Respected Sir,

We are writing to address a critical matter concerning Project Affected Persons (PAP) and their resettlement options in the context of urban development projects.

CREDAI-MCHI has been actively involved in the field of urban development and real estate and hence, we have observed a recurring issue where developers hesitate to provide alternative accommodation to PAP tenants, particularly in luxury or high-end development projects. This reluctance stems from the differing target clientele and affordability levels of the PAP flats and high-end units, making it challenging to accommodate PAP tenants in such luxurious buildings.

Consequently, developers are disinclined to avail of the benefits provided by Clause 33(12) of the Development Control and Promotion Regulations (DCPR) 2034, which results in PAP tenants facing difficulties in finding suitable and equitable resettlement options.

In light of this pressing concern, we earnestly request the incorporation of a clause, similar to the provisions found in Regulation 33(11) and 33(20)(B) of DCPR 2034, that allows developers to provide alternative accommodations for PAP tenants within a 5 KM radius from the location of their original residences or in an adjacent ward, under any relevant scheme or regulation.

The proposed clause shall read as follows:

"In any relevant scheme or regulation, developers shall have the option to provide alternative accommodation for Project Affected Persons (PAP) within a 5 KM radius from the location of their original residences or in an adjacent ward, ensuring that the housing provided is comparable in terms of size and amenities to the existing premises of the PAP. The authority may, at its discretion, relax the 5 KM distance requirement if suitable accommodations are available within the same ward."

By introducing this provision, we can address the concerns raised by developers who hesitate to accommodate PAP tenants alongside high net worth clients in luxury developments. This approach would offer developers the flexibility to choose locations for PAP flats that are economically feasible without compromising the welfare of PAP tenants. Moreover, it ensures that PAP tenants are not displaced to distant locations, preserving their social networks and livelihoods.

The suggested clause aligns with the principles of inclusive urban development, as it acknowledges the varying needs and affordability levels of PAP tenants. By allowing developers to consider alternative accommodations within a reasonable distance, we can uphold the dignity and well-being of all citizens impacted by urban development initiatives.

**Maharashtra Chamber of Housing Industry**

Maker Bhavan II, 4<sup>th</sup> Floor, 18, V. Thackersey Marg, New Marine Lines, Mumbai - 400 020.  
Tel: 42121421, Fax: 4212 1411/407 Email: [secretariat@mchi.net](mailto:secretariat@mchi.net) Website: [www.mchi.net](http://www.mchi.net)

CREDAI-MCHI CHAPTERS : THANE | KALYAN-DOMBIVLI | MIRA BHAYANDAR | RAIGAD | NAVI MUMBAI |  
BHIWANDI | PALGHAR BOISAR | SHAHAPUR-MURBAD | URAN-DRONAGIRI |  
VASAI VIRAR | ALIBAG | KARJAT-KHALAPUR-KHOPOLI | YOUTH NMR

CREDAI-MCHI believes that incorporating the proposed clause will lead to a fair, sustainable, and inclusive urban development policy for our city. It underscores our collective commitment to fostering a harmonious balance between growth and social responsibility.

We kindly request you to give due consideration to this request and take the necessary steps to modify any relevant scheme or regulation, allowing for PAP handover within 5 KM or adjacent ward as suggested. Your support in this matter would be instrumental in shaping a more equitable urban development policy for our city.

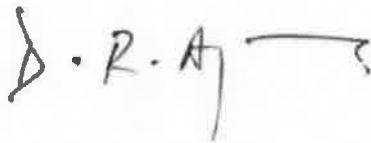
Thank you for your time and attention. We remain optimistic that this matter will receive the attention it deserves.

Thanking you,

Yours sincerely,  
For **CREDAI-MCHI**



**Domnic Romell**  
President



**Dhaval Ajmera**  
Hon. Secretary

**PS: Contact Person Mr. Sanjay Phope - +91 9619345193**