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To. Shri Satish Lokhande (I.A.S.), Chief Executive Officer, Slum Rehabilitation Authority, Bandra, Mumbai.

Ref. No. MCHI/PRES/23-25/135

Sub: Suggestion for processing Redevelopment proposals at SRA प्रशासकीय इमारत, वांडे (पूर्व), मुंबई - ५१

Respected Sir,

Firstly we are grateful you to consider our representations with regard to Charging interest rate on Deferred Premium in line with BMC and Mhada i.e. 8.5% erstwhile charged at 12.5%, and Extension on Land Premium deferment (10:10:80) and recommending to Housing department for their consideration and approval.

Sir there are few other pending issues which we would like to have attention and for your necessary action in order further smoothen the approval process for Slum Rehabilitation schemes. Few suggestion / points are as follows.

- 1) Request for implementation of new policy for parking of Non-Resident units for redevelopment scheme under regulation no. 33(10),30(10)A.
- 2) Recognizing and Regularizing transfer of structure after preparation of Annexure-II. Present Policy doesn't allow transfer of slum structures after preparation of Annexure-II. The ground reality is that 30-50% structures are transferred between Annexure-II and eventual allotment of flats. It is submitted that the Competent Authority should charge transfer fee and regularise the transfer of the structure, reflecting the name of the transferee in the Annexure-II.
- 3) SRA has come up with a draft lease agreement for lease of government or public land to slum/sale societies after completion of building/project, that needs drastic amendment. Request a joint committee to be formed with some developers, legal SRA, one or 2 engineering staff and architects. finalisation of the same.
- 4) For lands/roads handed over in SR scheme TDR should be granted. earlier FSI was given in relation to Land and there was a cap on construction and hence it was logical not to give TDR for road/reservation handover since FSI was given on gross plot area I.e. on such handover areas as well. but now there is no cap on fsi and developer is getting only fsi in relation to rehab component and not land area, hence TDr should be given for lands/reservations handed over in slum just like in other regulations.
- 5) Reduce approval process currently in place for shifting of religious structures within SRA scheme. Current Process as per Circular of the Home Department dated 23rd November 2009. NOC is required from Local Police station, Traffic, Commissioner of Police, Home Dept., UD before SRA issues CC for the same (This process takes a minimum of 8-12 months). We humbly suggest that a 2-person committee should be formed with CO SRA/Secretary SRA and Asst. Commissioner of Police as members which would meet twice a month (like the HPC) and deliberate on proposals for shifting of religious structures within an SRA scheme. The opinion of the local police station may be sought wherever required.

Maharashtra Chamber of Housing Industry

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- 6) Infrastructure charges: In DCR 1991, the infrastructure charges were charged on additional FSI over and above the basic FSI @ Rs.560/- per sq.mt. In DCPR 2034, Govt. of Maharashtra has revised the infrastructure charges @ 2% of the R.R. Rate, which makes many Slum Schemes difficult to implement. We request you to continue the policy of charging the infrastructure charges on additional FSI over and above the basic FSI @ Rs.560/- per sq.mt.
- 7) Mechanism for swift MOEF Clearances for SRA projects. NOC/Approvals should contain flexibility to enable Developers to make changes to layout/planning without having to apply and take NOC again and again. Further deliberations should be restricted to environmental factors.

We hope that the above suggestions will be considered positively, and necessary action will be taken.

Thanking you

Yours sincerely, For **CREDAI-MCHI**

President

Dhaval Ajmera Hon. Secretary