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To,
Shri Sanjeev Jaiswal [I.A.S.]

VP & CEO,
MHADA
5th Floor, Grihnirman Bhavan, Kala Nagar,
Bandra E, Mumbai- 400051

Sub: Request to reconsider increase in revalidation charges and other charges for redevelopment of cessed buildings under Regulation 33(7) and Cluster Development under Regulation 33(9) of DCPR 2034.

Ref: VP & CEO/ MHADA/ET-178 / 2023 dated 13.09.2023.

Respected Sir,

With reference to above policy circular, we wish to represent as under:

Vide your above referred circular, MHADA has revised the scrutiny fees for processing new proposal for issue of NOC and for revise proposal of NOC (ii) the revalidation NOC charges and (iii) Charges for processing and issuing orders u/section 95A of Mhad Act for eviction of occupier/s. The comparison analysis comprising of the earlier charges levied and revised fee proposal is tabulated as under:

| Sr. No. | Description | Area | Earlier Levied Charges | Revised Charges | % increase |
|---------|--|-------------------------|------------------------|--------------------------|------------|
| 1 | Scrutiny fees for processing the new proposals for NOC and for Revise proposal of NOC | Upto 5000 Sq. mtr. | Rs. 25,000/- | Rs. 1,00,000/- | 400% |
| | | 501 to 1000 Sq. mtr. | Rs. 50,000/- | Rs. 2,00,000/- | 400% |
| | | 1001 to 4000 Sq. mtr. | Rs. 1,00,000/- | Rs. 4,00,000/- | 400% |
| | | 4001 to 6000 Sq. mtr. | | Rs. 7,00,000/- | 700% |
| | | 6001 to 8000 Sq. mtr. | | Rs. 10,00,000/- | 1000% |
| | | 8001 Sq. mtr. And above | | Rs. 12,00,000/- | 1200% |
| 2 | The Revalidation NOC Charges | | Rs. 20,000/- per year | Rs. 10,00,000/- per year | 5000% |
| 3. | Charges for processing and issuing order under section 95-A if MHAD Act Eviction of occupier/s | | Rs. 50,000/- | Rs. 3,00,000/- Lumsum | 600% |

Maharashtra Chamber of Housing Industry

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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

Without challenging the lawful authority for periodic reviewal and enhancement of fees/ charges by MHADA; we wish you to appreciate our following views in the matter and reconsider the revision proposal:

1. We strongly feel that MHADA is not only a regulatory authority but also a facilitator for the redevelopment of the cessed properties. Accordingly, its policies should not overburden the project proponent undertaking redevelopment of the cessed properties.
2. Effect of any revised policy with financial implications should not be retrospective and adversely affect the ongoing projects but any such revised policy needs to be prospective only.

Re: Revalidation NOC Charges (item No.2 of the above table)

3. The planning authority MCGM has a settled policy to consider 3 years completion period for buildings upto 70 mtrs. in height and 5 years completion period for buildings above 70 mtrs. height for permitting installments in various premiums. As per MHADA Policy, Bank Guarantee is taken for a minimum period of 5 years. Accordingly, it is justifiable to prescribe validity of MHADA NOC for similar period of 5 years for building height upto 70 mtrs. and 7 years for building height above 70 mtrs. after initial 12 months period considered for approvals as per present policy. If this fair suggestion is implemented, revalidation of MHADA NOC is required after one year (12 months) and thereafter 5 years in case of new building height upto 70 mtrs. and 7 years in case of new building height above 70 mtrs.

We suggest the revalidation fees after one year to be maintained @ Rs.20,000/- (or to be revised with rational increment in tune with inflation index) and same may be levied at higher rate progressively for each year of delay after estimated construction period of 5 years or 7 years as the case may be. Our suggestion for delay period after 5 years is Rs.1,00,000/- per year with yearly increment of 10%. Similarly our suggestion for delay period after 7 years is Rs.1,50,000/- per year with yearly increment of 10%.

Re: Scrutiny Fees for processing (item No.1 of the above table) and charges for processing and issuing order u/s. 95A for eviction (item No.3 of the above table).

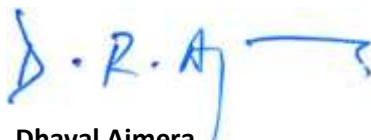
4. You will appreciate that housing rates are becoming unaffordable day-by-day to the law abiding citizens on account of heavy nature of various premiums and levies by the planning authority as well as the regulatory authorities. Recently medias have reported concerns about need to reduce the prevailing premiums and levies relating to the construction and development permissions. In this background, our humble request to you is for reconsidering exorbitant / unaffordable proposed increase in the range of 400% to 1200% in the scrutiny fees as well as charges in processing the eviction matters. **Our suggestion is to restrict the increment upto 50% maximum over and above the present charges.**
5. We hope and trust that you will accept our suggestions in interest of all by required hand holding and we assure you that our members will deliver the MHADA objectives for cessed properties at the earliest enriching the occupants of the cessed properties.

Thanking you,

Yours sincerely,
For CREDAI-MCHI



Domnic Romell
President



Dhaval Ajmera
Hon. Secretary