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2023-2025**

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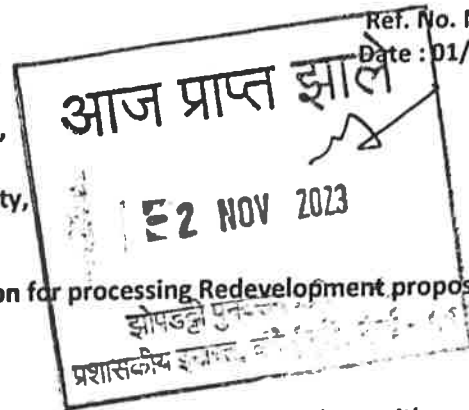
WOMEN'S WING CHAIRPERSON
Sejal Goradia

CREDAI-MCHI

Ref. No. MCHI/PRES/23-25/151

Date : 01/11/2023

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



Sub: Suggestion for processing Redevelopment proposals at SRA

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. We request that commercial units are converted into equivalent residential units as is followed at the time of computing tenement density of the scheme and parking requirements for them should be ascertained on the basis of such equivalent residential units.
- 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) Grant of Relocation of Religious Structures – In cases where religious structures are relocated within the area of the slum scheme in order to reduce approval process it would be in the interest of larger redevelopment to allow the same approval at the level of the Hon. CEO (SRA). 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

Maharashtra Chamber of Housing Industry

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Tel: 42121421, Fax: 4212 1411/407 Email: secretariat@mchi.net Website: 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

before SRA issues CC for the same (This process takes a minimum of 8-12 months). We humbly suggest that for shifting of religious structures which are reflected in the Annexure-II and which are a part of the SR scheme, no NOC from Home/UD may be insisted as they are existing amenities and are merely being relocated. Furthermore, liberty may be granted to the developers to provide additional area from their sale for such religious structures to smoothen the process of their shifting.

- 6) **Infrastructure charges:** Under Regulation 33(10)(A) the infrastructure charges were charged on additional FSI over and above the basic FSI @ Rs.560/- per sq.mt of the sale BUA only. However under regulation 33(10) of DCPR 2034, Govt. of Maharashtra has revised the infrastructure charges @ 2% of the R.R. Rate for both sale and rehab BUA, which has put a tremendous strain on the slum scheme. We request you to grant similar policy of charging the infrastructure charges under regulation 33(10)(A) with 33(10) on additional FSI over and above the basic FSI i.e @ Rs.560/- per sq.mt as cost of laying infrastructure is constant irrespective of the RR rate of the said area.
- 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.
- 8) **All deferment payments should be charged interest at the rate of 8.5% instead of 12% per annum as demanded presently by SRA.** MCGM and MHADA both charge 8.5% interest for deferred payments and hence there should be parity between developments across the boards in the same city.
- 9) **Vide Government GR bearing 22.09.2023 Housing Department had revised the schedule of payment for land premium wherein 10% was becoming due and payable at LOI stage, 10% at sale CC stage and 80% at sale OC stage. Vide Resolution dated 22.03.22 the same was extended for a period of 1 year. We humbly request that the said 10:10:80 schedule of payment be permanent as high outlay towards land premium at inception stage is a huge deterrent for development of government slum encroached lands.**
- 10) **As per accompaniment to the government in Urban Development Notification No. – TPB – 4313/CR-41/2013/UD-11 Dated 20.10.2023. In regulation 33 (9), for redevelopment project, following modification project, following modification approved under new clause 24 in 37 (9). However, through it is not mandatory to obtain approval of high Rise Committee for the building having height of less than 250 mt. under cluster development scheme, but if the project proponent wish then he has option to refer his proposal of high rise building under cluster development scheme. Wherein building having height in the range from more the 120 Mt. to 250 mt. to Technical Committee for high rise building constituted as per Reg. 19 (2A) for the sake of multiple expert opinion. In view of this, we would like request that other redevelopment project like 33(10), 33(10)A, & 33(5) where such type of scheme need such a modification to expedite project should be also be considered for No HRC for building height below 250 mt.**

11) Eviction Task Force – In multiple Round table open forum meetings between the then Hon. CEO (SRA) and the various stake holders of SRA Schemes it was suggested and unanimously agreed that SRA ought to have a dedicated task force containing of Government Officers from the Deputy Collector Department and the Police Authorities as well to help expedite eviction procedure under 33, 33(A) and 38, 3Z-1 of the slum act. Already as on date there is significant delay in procedure of under 33, 33(A) and 38, 3Z-1 since at present only single authority is present. Apart from that the Competent Authority i.e. Deputy Collector (SRA) after proposing the eviction date needs approval from the Local Senior Police Inspector, Divisional ACP's and Jt. C.P. (Admin) before Police Protection is granted for the process of eviction to be carried out. More often than not the approval of the police authorities in view of this long process is not completed before the proposed date of eviction. As a result tremendous delay is incurred. Considering the same we request that SRA be allowed to appoint and constitute dedicated eviction task force for carrying out eviction of errant slum dwellers. The developers are more than likely and willing to pay the necessary protection fees to that effect in the interest of expeditious approvals.

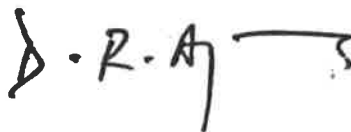
We hope that the above suggestions will be considered positively, and necessary action will be taken.

Thanking you

Yours sincerely,
For CREDAI-MCHI



Dominic Romell
President



Dhaval Ajmera
Hon. Secretary



झोपडपट्टी पुनर्वसन प्राधिकरण

जा.क्र. झोपुप्रा/न.र./पार्किंग प्रस्ताव/२०२४/ ४९
दि :-

30 JAN 2024

प्रति,

मा. अतिरिक्त मुख्य सचिव
गृहनिर्माण विभाग,
मंत्रालय, मुंबई

विषय — To calculate the parking requirement for non-residential units for re-development proposal under Regulation 33(10) considering equivalent residential tenements for non-residential units

संदर्भ — १) अध्यक्ष, CREDAI- MCHI यांचे दि. २०/०९/२०२३ रोजीचे पत्र

१) अध्यक्ष, CREDAI- MCHI यांचे दि. ०१/११/२०२३ रोजीचे पत्र

महोदया,

विषयांकित प्रकरणी अध्यक्ष, CREDAI- MCHI यांचे संदर्भित क्र. १ व २ प्रमाणे पत्र प्राप्त झाले असून (प्रत सलग्न) सदर पत्रात CREDAI संस्थेनी झोपडपट्टी पुनर्वसन योजना सुलभपणे राबविण्याकरीता, Parking च्या दृष्टीकोनातून खालील प्रमाणे बदल सुचविलेला आहे —

- 1) Request for implementation of new policy for parking of Non-Resident units for redevelopment scheme under regulation no. 33(10), 33(10)(A). We request that commercial units are converted into equivalent residential units as is followed at the time of computing tenement density of the scheme and parking requirements for them should be ascertained on the basis of such equivalent residential units.

संदर्भित पत्राच्या अनुषंगाने, अर्जदार संस्था यांनी वाणिज्य स्वरूपाच्या पुनर्वसन सदनिकांचे क्षेत्राचे समतुल्य रहिवास सदनिकांच्या क्षेत्रामध्ये रूपांतर करून, Parking प्रस्तावित करण्याबाबत नवीन योजना राबविण्याबाबत विनंती केली आहे.

मंजूर विकास नियंत्रण व प्रोत्साहन नियमावली — २०३४ मधील विनियम क्र. ४४ मध्ये Parking बाबत तरतुदी नमूद आहेत. सदर विनियमातील तक्ता क्र. २१ मध्ये रहिवास वापराकरीता आवश्यक Parking संदर्भात खालील प्रमाणे तरतूद नमूद आहे —

- One parking space for every. a) 4 tenements having carpet area upto 45 sq.m each.
b) 2 tenements with carpet area exceeding 45sq.m but not exceeding 60sq.m each.
c) 1 tenement with carpet area exceeding 60sq.m but not exceeding 90sq.m
d) 1/2 tenement with carpet area exceeding 90 sq.m.

“Provided that for the redevelopment under Regulation 33(5), 33(6), 33(7)(A), 33(9), 33(9)(B), 33(10), 33(10)(A), 33(11)(A), 33(15)& 33(20)(A) the parking shall be as follows.

सबब, २० चौ.मी. पेक्षा अधिक असलेल्या ३ सदनिकांकरीता आवश्यक parking ची सुविधा —
 $६२.७०/५० = १.२५$ (१ parking)

C) १० % किंवा किमान २ visitor parking ची सुविधा — २ parking

सबब, मंजूर विकास नियंत्रण व प्रोत्साहन नियमावली — २०३४ मधील विनियम क्र. ४४ च्या अनुषंगाने आवश्यक parking ची सुविधा (A + B + C) = ४ parking

आता, अर्जदार संस्था यांनी विनंती केल्यानुसार वाणिज्य स्वरूपाच्या पुनर्वसन सदनिकांचे क्षेत्राचे समतुल्य रहिवास सदनिका केल्यास : $१५५.४०/२७.८८ = ५.५७$ (६ सदनिका)

मंजूर विकास नियंत्रण व प्रोत्साहन नियमावली — २०३४ मधील विनियम क्र. ४४ च्या अनुषंगाने रहिवासी सदनिका करीता आवश्यक Parking ची व्यवस्था:

D) पुनर्वसन च्या एकूण ६ सदनिका असल्याने — १ parking

E) १० % किंवा किमान १ visitor parking ची सुविधा - १ parking

सबब, अर्जदार संस्था यांनी विनंती केल्यानुसार parking प्रस्तावित केल्यास आवश्यक parking ची सुविधा (D + E) = २ parking

सबब, अर्जदार संस्था यांनी विनंती केल्यानुसार वाणिज्य स्वरूपाच्या पुनर्वसन सदनिकांचे क्षेत्राचे समतुल्य रहिवास सदनिकांच्या क्षेत्रामध्ये रूपांतर करून, Parking प्रस्तावित केल्यास आवश्यक वाहनतळांची संख्या ५०% ने कमी होईल.

सद्यस्थितीत प्राधिकरणाद्वारे झोपडपट्टी पुनर्वसन प्रस्ताव राबवितांना झोपडपट्ट्यांची घनता (density) अधिक असल्याने प्रस्तावातील नियोजनाच्या दृष्टीने अनेक अडचणी निर्माण होत असल्याचे दिसून येत आहे. सबब, मंजूर विकास नियंत्रण व प्रोत्साहन नियमावली — २०३४ मधील विनियम क्र. ४४ च्या अनुषंगाने parking ची सुविधा प्रस्तावित करण्यात अडचणी निर्माण होतात.

मंजूर सुधारीत विकास योजना — २०३४ व मंजूर विकास नियंत्रण व प्रोत्साहन नियमावली — २०३४ च्या नियम ५१ मध्ये खालील प्रमाणे नमूद आहे —

“Parking Authority - MCGM, with approval of Corporation in consultation with GoM, shall constitute a Parking Authority at MCGM level to plan, regulate and manage all on/off street parking and public parking places under the physical jurisdiction of Greater Mumbai. The constituted Parking Authority, inter alia, will fix and promulgate parking fees as well as penalties for various areas/zones in MCGM.”

सबब, मंजूर सुधारीत विकास योजना — २०३४ व मंजूर विकास नियंत्रण व प्रोत्साहन नियमावली - २०३४ याचे मुळ नियोजन प्राधिकरण हे बृहन्मुंबई महानगरपालिका असल्याने, तसेच बृहन्मुंबई महानगरपालिका द्वारे बृहन्मुंबई महानगरपालिकेच्या हद्दीतील parking संबंधित नियोजना करणे करीता Parking Authority ची तरतूद असल्याने सदर प्रकरणी, मा.आयुक्त, बृहन्मुंबई महानगरपालिका यांचे अभिप्राय विचारात घेऊन शासनस्तरावर निर्णय घेणे उचित होईल, असे मत आहे.

सहपत्र — वरील प्रमाणे

आपला,

(सतिश लोखंडे)

मुख्य कार्यकारी अधिकारी
झोपडपट्टी पुनर्वसन प्राधिकरण