

Ref. No. MCHI/PRES/23-25/238  
Date: 20/3/2024



To,  
**The Regional Executive Director - Western Region,**  
Airports Authority of India,  
Sahar Road,  
Andheri East, Mumbai

**Sub: CREDAI-MCHI's suggestions on the pending issues with AAI pertaining to real estate sector regarding granting NOCs/Approvals.**

Dear Sirs,

We would like to bring to your kind attention the issues being faced by the real estate sector regarding granting of NOCs/Approvals by AAI.

With regards to the same and to have a detailed discussion in the meeting scheduled today, i.e. 20<sup>th</sup> of March, please find attached herewith important points to be taken up for the discussion.

Yours sincerely,  
**For CREDAI-MCHI**

**Domnic Romell**  
President

**Dhaval Ajmera**  
Hon. Secretary

**Encl.: As above**

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

**PRESIDENT**  
Domnic Romell

**IMMEDIATE PAST PRESIDENT**  
Boman Irani

**PRESIDENT-ELECT**  
Ajay Ashar

**STRATEGIC ADVISOR**  
Abhishek Lodha

**SENIOR VICE PRESIDENTS**  
Parag Shah  
Jayesh Shah  
Sukhraj Nahar  
Sandeep Raheja  
Rasesh Kanakia

**VICE PRESIDENTS**  
Bandish Ajmera  
Shailesh Puranik  
Pritam Chivukula  
Amit Thacker  
Jackbastian Nazareth

**SECRETARY**  
Dhaval Ajmera

**TREASURER**  
Nikunj Sanghavi

**JOINT SECRETARIES**  
Tejas Vyas  
Pratik Patel  
Sunny Bijlani  
Rushi Mehta

**JOINT TREASURER**  
Gurminder Singh Seera

**COMMITTEE MEMBERS**  
Shahid Balwa  
Subodh Runwal  
Parag Munot  
Nainesh Shah  
Mukesh Patel  
Munish Doshi  
Raajesh Prajapati  
Shailesh Sanghvi  
Parth Mehta  
Harmohan Sahni  
Jayvardhan Goenka  
Umang Kuwadia  
Prashant Khandelwal  
Binitha Dalal  
Ayushi Ashar  
Samyag Shah  
Ricardo Romell

**SPECIAL ADVISORS**  
Ar. Hafeez Contractor  
Adv. Parimal Shroff  
Anuj Puri

**STATISTICS AND RESEARCH**  
Dr. Adv. Harshul Savla

**INVITEE MEMBERS**  
Rahul Sagar  
Ramkrishna Raheja  
Nishant Agarwal  
Harsh Hiranandani  
Ajay Nahar  
Azim F. Tapia  
Cherag Ramakrishnan  
Vijay Lakhani  
Jayesh Chauhan  
Aditya Shah  
Shraddha Goradia  
Sudhanshu Agarwal  
Hussain Lalani  
Sahil Parikh  
Aditya Mirchandani  
Rushi Ajmera

**YOUTH WING CONVENOR**  
Naman Shah

**PROCUREMENT CONVENOR**  
Nimish Ajmera

**WOMEN'S WING CHAIRPERSON**  
Sejal Goradia

**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 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

Sr. No.	Pending Issue	Current Status	Stakeholders request
	is sent by email to the client.		
9.	If an intial NOC application is rejected for some reason (Grammatical error, incorrect site elevation etc.....) by MIAL or AAI, the case is put up in the next RNOCC meeting which happens once a month. Once the case is finally rejected in the RNOCC meeting, the applicant can reapply again with the corrections.	Due to this a lot of delay is caused for re-application by the party. It takes generally one month or more for the re-application.	MIAL / AAI should instantly reject the application (in NOCAS) and the applicant should be able to re-apply for the NOC with revised and corrected data instantly on rejection by MIAL/AAI.
10.	Verification of building heights for issuance of commencement certificate and occupation certificate based on the request by approving body.	On a request letter / email from the approving body (SRA/MHADA/MCGM/MMRDA), MIAL verifies the height of the building under construction (on plinth and every time a fresh commencement certificate). MIAL also verifies and certifies the final height of the building once Occupation certificate is applied. Due to this, the building under construction is verified by MAIL at least four to five time during the entire construction period.	MIAL to verify the building height only on plinth and verify the final height of the building once the Occupation certificate is applied. This shall save time.

Sr. No.	Pending Issue	Current Status	Stakeholders request
	authorized personnel if an Authority Letter is submitted by the client.		to the client / Authorised personnel based on a request letter by the client.
7.	<p>Issues with NOCAS:</p> <p>A) During online initial NOC application, AAI verification Email is not received in a few cases.</p> <p>B) After online initial NOC application confirmation email from AAI WR is not received in few cases.</p> <p>C) After an online initial NOC application the status of the NOCAS ID is not shown in the Dashboard.</p>	The issues highlighted have come up in very few cases.	AAI WR to take this up and resolve.
8.	<p>A) AAI WR sends a hard copy (to the client) of the letter sent to MIAL for verification for all revalidation cases by speed post to the client.</p> <p>B) During the application the contact person /contact number and email address is mentioned, yet no correspondence</p>	This issue highlighted is applicable to all the revalidation cases.	An email to be sent to MIAL along with a CC to the applicant / authorized personnel to save time.

**Points for Discussion at Stakeholders meeting at AAI WR**

Sr. No.	Pending Issue	Current Status	Stakeholders request
1.	Automatic Extension of the validity period of 9 months (Deemed extension as per ATMC 7 of 2020)	This provision of 9 months extension has been withdrawn from September 2022.	Request to grant 9 months extension to all NOCs valid before 24.03.2020 (the start of a pandemic)
2.	Conduct aeronautical study for projects in Navi Mumbai	The aeronautical study has not yet started for plots falling under the Navi Mumbai airport region resulting in a heavy loss for developers due to a lack of clarity on the permissible height and planning for their project.	To initiate aeronautical study for plots in Navi Mumbai at the earliest
3.	Restrictions due to CNS Criteria in particular HF Transmitter (Tx) & Receiver (Rx)	It is recommended that HF Tx and Rx Systems Should be re-located outside the main city areas of Mumbai, Chennai, and Kolkata so that height restricted are not imposed on a building located in main city areas and the quality of HF signals is also not affected, In respect of Mumbai, the Commissioner of MCGM has committed to this expert committee to allocate required land which meets operational requirements to re-locate HF TX and RX System from its present location. This needs to be followed up by the competent authority.	<p>This is affecting the building heights of a very large area of Juhu and Dahisar.</p> <p>AAI and MCGM to work closely on this and resolve the HF Transmitter and Receiver issue as per the recommendations.</p>
4.	Uploading of Revised NOCs and Revalidated on the NOCAS website.		Awaiting implementation from AAI, WR & AAI, CHQ.
5.	Displaced threshold issue	Case by case review is required to be done by Airport Operator	AAI/DGCA to initiate a review by Airport Operator and implement it at the earliest.
6.	Revised NOC issued by AAI WR (after the entire appeal process) should be handed over to the client /	The Revised NOCs are not being handed over to Client / Authorised personnel, instead the revised NOC is sent by Speed Post.	The NOC's are not delivered to various clients due to change in address predominantly. AAI WR should handover the Revised NOCs