

o/c

CREDAI-MCHI

NAREDCO
MAHARASHTRA

PEATA

BDA
BRIHANMUMBAI
DEVELOPERS ASSOCIATION



Date : 30th Oct 2025

To,

Shri. Mahendra Kalyankar (I.A.S.)

Chief Executive Officer

Slum Rehabilitation Authority

Sub: Embarking on a path to EODB 2.0 through policy tweaks and procedural changes to unleash the Real Estate Industry's potential for spurring on the economy and boosting development.

Respected Sir,

Firstly, we would like to extend our heartfelt congratulations to you and your team for securing the first rank among 95 corporations for outstanding reforms under the second phase of the State Government's 100 Days Reform Program. This remarkable achievement reflects your unwavering commitment to bringing transformative changes within the SRA and your sincere efforts toward improving the living standards and social well-being of people residing in slum areas.

Thank you, Sir, for your kind invitation to this meeting. Today, we stand at a crucial crossroads as stakeholders of the real estate industry. We come before you not to seek concessions or handouts, but to humbly request a few policy and procedural modifications that will significantly enhance the ease of doing business within our industry.

We four associations, PEATA, BDA, NAREDCO & CREDAI MCHI come before you not as four separate associations but as one voice for bringing about the betterment of our Industry. We and our members are the true instrumentalities for development in Mumbai MMR.

We see ourselves consider ourselves as partners of the Government entrusted with the responsibility for catering not only to the housing demand of the city through sustainable development but also bring about rapid growth through the multiplier effect that our Industry brings into play.

We are attaching herewith a list of issue in details for your kind perusal and necessary direction.

Thank you for kind consideration.

Yours sincerely

CREDAI-MCHI
President

NAREDCO Maharashtra
President

PEATA
President

BDA
President

Encl : As mentioned Above



Sr.no	Issue/Topic	Suggestion	Remarks
1	10:10:80 payment schedule for payment of all SRA premiums	10:10:80 is successfully implemented in land premium and the same should be extended to all premiums. We request SRA to give recommendation to UD/GOVT in that regard.	Recommendation to UD
2	Shifting/relocation/demolition of Religious structures within SR scheme is governed by Home Circular of 2009 wherein Developer has to take concurrence from Local police station, traffic dept, CP, Home & UD which is a minimum 9-12 month process	All religious structures within SR scheme should be exempted form 2009 Home Circular and its shifting/demolition/relocation within SR scheme should be done at CEO SRA Level. If the CEO SRA so wishes, he may request for a report from the concerned police station.	Recommendation to Home
3	Infrastructure Charges was earlier Rs. 560 & Rs. 840 per sq.mtrs of FSI above the zonal FSI. This has been increased to 2% of RR rate of land.	The cost of constructing infra is not dependent on land prices and hence linking it to the same is not logical. Request SRA to recommend to UD to revert to the old system/calculation of infra charges.	Recommendation to UD
4	Site Clearance Delays	Subsequent to Circular 210, these issues have been magnified as a lot of money is wasted due to the non eviction/vacation of few slum dwellers. SOP for action under 33/38 to be formulated by joint committee with strict timelines to ensure accountability and consequential remedy for Developers if the time lines are not adhered to. 33A to be scrupulously implemented. Disgruntled slum dwellers on one hand cannot be allowed to stall a SR scheme and on the other hand be allowed to extract benefit there from as a matter of entitlement	SOP to be created by Joint Task force
5	SOP for takeover of stalled schemes	Pending Rent of previous developer if paid by new developer should be reduced from valuation to be paid to outgoing developer. Also whilst calculating the valuation of outgoing developer, transit rent paid should not be added. Wasted Rent makes project	SOP to be created by Joint Task force

		unviable and if outgoing developer is allowed to take back money for his/her/their inefficiency then project will never become viable. A panel of valuation specialists be empanelled to ensure stalled projects valuation of outgoing developer is done as per standards and in a speedy manner.	
6	Cut off for eligibility appeal process. Slum dwellers appeal after 5-10 years towards fag end of project and sometimes even when their structure was not reflected in the initial annexure-II		SOP to be created by joint task force for the same
7	Request for Extension to land Premium	Land premium of 10:10:80 has been expired on 30 September 2025. Request for recommendation to Housing department for Extending it further.	Recommendation to Housing
8	Request for Extension of Instalment Policy for Building Permission	SRA Vide circular dated 2 nd July 2024 had adopted instalment Policy which was valid till 3 rd September 2025. Now BMC has extended the facility for 3 years. Thus SRA should also extend the same, additionally a recommendation letter to UDD for extending instalment for State portion of premium as well.	Recommendation to UD
9	LOI and IOD on self certification of Annx-II or as per density	Anx-II takes a long time and MOEF is delayed till that. Hence this will help developer save time on procuring MOEF	
10	Allow Blockwork Plaster in RCC CC	Subsequent to circular 210, there is enough security with SRA to enable them to allow developers this leeway. Finishing other than blockwork plaster may still be blocked until regular CC is procured	
11	Allow switch from deferment policy under circular 185-186 to circular 224		
12	ZERO FSI IOD to be granted in SRA akin to BMC		
13	Rehab building to be provided full CC upfront and plinth checking to be entrusted to Architects on self certification	The Architects may add Photos and videos of plinth checking to the file which may be viewed/reviewed by SRA Officials if they may so wish.	

			Bank Finance is given on basis of sale CC and this will ensure that Developers will get early access to funding.	
14	Commercial parking to be at par with residential parking or Non resi parking to be 1:4		Recommendation to housing had been sent 2 years back and no further progress is being made. Request SRA to send a reminder letter to Housing with respect to the earlier recommendation.	Reminder letter to Housing
15	Change of Developer premium to be removed		Not conducive for joint developments which is prejudicial to implementation of SR schemes.	Circular
16	SRA to recommend to UD that Areas covered by parking, staircases, lifts, lift lobbies in rehab building to be counted in rehab component		As per Sr no 3.15.12 of Housing Policy 2025	Recommendation to Housing & UD
17	Immediate stop work notices on non payment of rent without granting opportunity to developer for his/her/their say		No stop work should be granted without giving an opportunity to Developer to put across their say in the matter or grant him an opportunity to deposit the rent as the case may be.	
18	Reduce inefficiencies in approval process by reducing number of officers overseeing each proposal		EODB for SRA to be created by Joint task force	Deliberation in Joint task Force
19	Scrutiny Sheet/Channi Patra		To be done on self-certification by Architect. Till the time entire system becomes online. Once that happens, no need for scrutiny sheet as real time details of total eligibility in a project would be reflected online.	
20	Key distribution at society level and not be estate SRA			
21	NOC as per 210 to be insisted before demolition of slum structures instead at LOI.			
23	Repeated compliance of circular 210 asked for every approval		Once NOC is procured by developers by depositing 2+1 years rent then subsequent approvals should not attract repeated 210 NOCs	
24	Procedure for new schemes on land reserved for RG/PG subsequent to high court order in 1152 of 2001		SOPs to be created by Joint task group	

25	All DP reservations to be handed over to SRA and then SRA will handover to MCGM		
29	Not to insist, CTSO NOC for 33 11 schemes	Title certificate to be insisted as per practice in BMC as conveyance / DA are submitted by the developer	