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Naman Shah

**PROCUREMENT CONVENOR**

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**WOMEN'S WING CHAIRPERSON**

Jesal Shah

To,

**Shri Santosh Warrick**

Director

Maharashtra Fire Service

**Subject: Representation on Challenges Faced by Developers Due to CFO Policies and Practices**

Respected Sir,

On behalf of CREDAI-MCHI and the real estate developers of Mumbai, we wish to highlight several challenges caused by the current practices and interpretations of fire safety regulations. These issues are adversely affecting the housing and redevelopment sector, leading to delays, financial burdens, and project inefficiencies.

**Key Issues and Representations**

**Fire Service Fee Timing:**

Currently, fire service fees are charged at the submission stage, alongside scrutiny fees, which is an additional financial burden. We propose that:

- Scrutiny fees be paid at the time of submission for CFO plans, ensuring scrutiny with proper methodology and a defined timeframe for response.
- Fire service fees be charged only at the stage just before the issuance of the Occupation Certificate (OC).

**Inconsistent Access Guidelines:**

Developers face unclear guidelines regarding access to plots, particularly for narrow or constrained pathways. The following clarifications are essential:

- Clearly define acceptable means of access and types of firefighting vehicles required for specific scenarios.
- Provide justification in advance for restrictions on building heights, such as capping at 70 meters instead of 90 meters, along with requirements for open spaces.

**Refuge Area and Staircase Guidelines:**

Developers require detailed guidelines at the scrutiny stage regarding:

- The location and specifications of refuge areas for buildings capped at 70 meters.
- The number of fire staircases, fire lifts, and basement staircases required for compliance.
- A lack of such upfront clarity leads to unnecessary back-and-forth, delaying projects.

**Mandating Robotic Parking Access:**

- The insistence on access to every car in basement robotic parking is impractical. A more practical alternative would be to mandate access to strategically identified areas.

**Maharashtra Chamber of Housing Industry**

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**Redevelopment Specific Issues:**

- For Plots Below 500 Sq.m. with Two Roads: Allow non-residential developments with a single staircase for floors up to 32 meters.
- Rehabilitation of Small Shops (G+1 Units): Permit internal staircases of 0.9 meters, even without access to a main staircase.
- Small Plots/Commercial Units: Align redevelopment definitions with RERA (plots below 500 sqm and units below 1,000 sq.ft.) for clarity.

**Scrutiny Delays and Inconsistent Interpretations:**

- The scrutiny process lacks a defined Standard Operating Procedure (SOP), resulting in varied interpretations during plan revisions. This inconsistency leads to delays and disrupts project financial planning. A straightforward, transparent SOP for plan scrutiny and revisions is essential.

**SUGGESTIONS AND REQUESTS:-****Issue SOP/Directives:**

- Introduce a clear, comprehensive SOP to ensure timely scrutiny, standardized interpretations, and a streamlined approval process.

**Fee Structure Review:**

- Reassess the timing and structure of fire service fees to reduce the financial burden on developers and align fees with project stages.

**Defined Guidelines:**

- Provide upfront guidelines on refuge areas, fire access, open spaces, staircases, and other fire compliance requirements during scrutiny to avoid iterative requests and delays.

We believe addressing these concerns will significantly enhance the efficiency of the housing sector, promote redevelopment, and align with the state's vision for urban development.

We look forward to your support and an opportunity to discuss these matters further.

Thanking you,

Yours sincerely,  
For **CREDAI-MCHI**



**Domnic Romell**  
President



**Dhaval Ajmera**  
Hon. Secretary

Rcrd  
11/12/2024  
( P. V. Hindlekar )  
Superintendent  
Maharashtra Fire Services