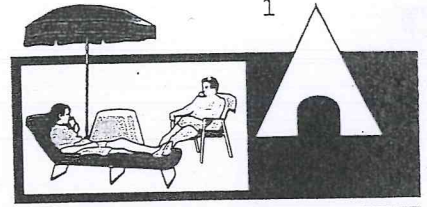


I-26



# Delhi Motels Association

President's Office : B-52, G.T. Karnal Road, Indl. Area, Delhi - 110 033, Mob.: 9811034487

Office: Carnival Motel, G. T. Karnal Road, Palla Mord, Alipur, Delhi

Ref.....

OFFICE OF UDM

Dy. No. 3232

Date 19.17.12

Min. of Urban Development
Central Registry
Dy. No. 6692
Date 13/7
To.....

Date 6<sup>th</sup> July 2012

To,

Mr. Kamal Nath ji  
The Honble Minister for Urban Development  
Government of India  
New Delhi-110001

PS7000M

PS to UDI  
19/7  
sec (us)

**Sub: Objections/Suggestions in response to the Public Notice dated 11.6.2012, File No. F20(4)/MP/Vol II, proposing to modify the Master Plan for Delhi (MPD) 2021 with respect to Motels**

Respected Sir,

Delhi Development Authority has published the above mentioned public notice, inviting objections / suggestions with respect to the proposed modifications, we place before you following submissions / suggestions with respect to Motels, for your kind consideration:

1. Criteria adopted by the DDA in selecting class of motels for enhancement of their FAR. Is completely faulty which clearly indicates some influential business group behind it for huge personal gains.
2. We draw your attention to letter no. F-20(4)/05/MP/part-1 (A)/26-G dated 28.02/2008 wherein joint Director (MP) Mr.H.S.Dhilion had suggested that "Motels existing on 1.1.2008 to be allowed to upgrade to 3(Three) star status with FAR 175. In spite of the fact that the that the matter was focused upon at the highest level and the Honble LG, Commissioner Planning and V.C. had agreed to grant 175 FAR to all motels in delhi. But the said recommendation was not implemented which is a great in justice to the entire trade.
3. We draw your kind attention to the modification carried out vide Notification dated 27.01.2006 where in DDA had been fair enough to put hotels in commercial use zone and all other use zones at par and had increased FAR accordingly. It is most respectfully submitted that we do not see any reason as to why the motels in different use zones be differentiated for the purpose of the proposed modifications. In any event the Gazette Notification dated 15.01.1977

has clearly defined Motels as Hotels only. In view of the above submissions we would take this opportunity to propose to the Government to take up the case of the Motels (left outside the scope of the proposed modification of Delhi Master Plan) more rationally and include the said Motels also in the coming plan of modification.

4. In this proposed modification of master plan the motels falling on the facility corridor are only being allowed for increase from 15 to 175. This facility corridor too has been drawn and decided by DDA in a completely faulty manner clearly proving the existence of this influential business group to enjoy the benefits of this change in the master plan. The motels falling in urbanized villages have also been completely ignored. It makes no sense by the planners of DDA not to include the motels located in the newly announced urbanized areas of MPD 2021 in this category of motels to which increased FAR of 175 is being allowed. Motels located in urbanized villages and engaged in commercial activities clearly indicated that it is commercial use zone. Therefore motels in urbanized villages should also be eligible for increased FAR.
5. It is also a matter of grave concern as to how the DDA can discriminate in granting opportunities of expansion and development to various sets of motels located in nearly similar regions, providing similar facilities and accommodations to the tourist traffic and having identical growth potential in the tourism industry. This amendment seems to have been done to favour a few. It is suggested that all the motels of Delhi should be eligible for increase in the FAR and not only a few, as proposed.
6. So many motels located on national highways and interstate roads have been ignored where as some motels located in densely populated residential areas have been chosen under this proposed modification. This again proves conveyance of the decision makers in the master plan section of DDA.
7. Vide a notification dated 16.6.1995, the Delhi Development Authority had permitted Motels in Rural Zone / Green Belt and in Commercial Zones on National Highways and inter-state roads as defined. A Motel located in the Rural Zone / Green Belt was made subject to various norms and building standards provided in the notification, interalia providing that:

“(iv) The FAR shall be 15, subject to a maximum floor space of 1500 sq. mts. each on the first and second hectares, and 5% of the area of the remaining land comprised in the site subject to a maximum of 1500 sr. mts.”

8. The MPD -2021, as published originally, contained the following, insofar as Motels are concerned:

“3.2 Urban Extension:

..... Considering the constant pressure on the rural land, new farmhouses and motels shall not be permitted in the proposed Urban Extension as per MPD-2021.”

3.2.1 Green Belt

..... Considering the constant pressure on the rural land, new motels shall not be permitted in the green belt. However, existing village abadis, regularized unauthorized colonies and approved motels may continue in the green belt. ....”

9. Since the area provided in the 1995 notification was no longer adequate to cater to the needs of public, an inter-departmental committee was constituted by VC, DDA under the chairmanship of Commissioner (Planning) to look into issues related to FAR for Hotels and Motels. The Committee made certain recommendations, and the LG, after considering the recommendations, ordered that a proposal be sent to the Ministry of Urban Development for following modifications in MPD-2021 :

- (i) FAR for Hotels to be increased to 225;
- (ii) Motels existing on 1.1.2008 to be allowed to upgrade to 3 Star status with FAR 175.

This was recorded in a letter dated 28.2.2008 written by Mr. H.S. Dhillon (Jt. Director (MP) ) to the Under Secretary (DD) Ministry of Urban Development.

10. Based on the aforesaid, and also in view of various representations by the Motel Welfare Association in this regard, DDA decided to take a policy decision on increase of FAR for Motels. It is in view of the aforesaid policy decision, that the public notice was published on 11.6.2012, proposing a maximum coverage of 45% and FAR of 175 for Motels with sanctioned plan as on 7.2.2007 and located in the commercial areas or proposed facility corridor in zonal development plans.

11. It is submitted that the 1995 notification permits opening a motel in a Rural Zone, Green Belt and in commercial zones on National Highways and inter-state roads. However, while permitting the motels existing as on 7.2.2007 to increase their coverage and FAR as mentioned above, such permission has been accorded only to motels located in the commercial areas or proposed facility corridor in zonal development plans.
12. It is submitted that the need to amend the Master Plan has arisen due to changing needs of public at large and to adequately cater to the requirements of tourists etc. While the increase in FAR has been made applicable at par to all the hotels (Table 5.4(c) ), parity has not been followed in the proposed modification, and the motels located in Rural Zone and Green Belt area have been left out from its purview. We are situated in the Rural Zone, and will be severally affected by this proposed modification, if it is not made applicable for us also.
13. It is submitted that Motels in and around Delhi have played a significant role in catering to the need of the tourists and visitors by road, and have made available to them, the desired services and accommodation to their satisfaction. However, in view of the rapid development in the rural areas in past few years, even motels situated in rural areas are in dire need of systematic and stable development. Low FAR and FSI has been a cause of concern and has become a serious issue insofar as problems related to land use for urban requirements are concerned. Vertical development has been the need of the day for a while now.
14. In such circumstances, it is not clear as to why the Motels falling in the selected areas have been excluded from the development scheme as proposed by DDA. It is submitted that this proposed exclusion denies us the opportunity of extended FAR as provided by DDA to others, while completely overlooking the fact that Motels such as ours, which are located in excluded areas are equally accessible and are competent to provide services and facilities at par with others. It is also pertinent to note that the motels which have been excluded from the proposed modification are in the vicinity of the rural population, and any such proposed scheme of development will benefit the adjoining rural population directly in terms of employment and will also result in economic growth of the area.
15. It is submitted with great respect that while carving out an exclusion from the development scheme, the DDA has not assigned any reasons for the same, and there appears to be no rationale for such exclusion. The motels are located in nearly similar regions, providing similar facilities and accommodation to the tourists, and having identical growth potential in the tourism industry. It is submitted that a pragmatic view of the matter is also required when such policy decisions regarding development are taken. The situation as it exists on site will reveal that there is practically no difference between the motels, though they are located in different zones.
16. It is also submitted that such disparity will also seriously affect the business prospects of the motels such as ours. A motel existing on 5% ground coverage and 15 FAR

cannot compete with a motel with 45% ground coverage and 175 FAR. It is respectfully submitted that if the proposed modification is implemented as it is, then it will be arbitrary, discriminatory, and violative of fundamental rights of the undersigned, as provided in the Constitution of India.

17. In view of the aforesaid, we place the following suggestions for the kind consideration of DDA:

(I) Modification in Para 3.2 "Urban Extension" should also include the Motels located in rural areas, on and around the National Highways and inter-state roads connecting Delhi;

(II) Modification in Table 5.4 (f), column 1 should also include the Motels located in rural areas, on and around the National Highways and inter-state roads connecting Delhi;

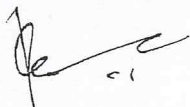
(III) As directed by LG, and mentioned in the letter dated 28.2.2008 (referred to above), motels existing on 1.1.2008 may be given opportunity for upgrading their status to three star and enhancing the FAR to 175.

18. We are sure the DDA shall look into these suggestions objectively, and will consider them keeping in view the overall growth of the tourism industry, as also promises of economic and commercial development of the rural area, and will consider the principles of parity before coming to a final decision.

19. Please let us know if we can be of any further assistance to DDA in this matter. We are ready and willing to provide any further clarification in this regard. Please also grant us an opportunity of personal hearing to address the issues discussed hereinabove before any final decision is taken.

Thanking You,

Yours Faithfully



*for* (Subhash Kakkar)  
President