# HARYANA REAL ESTATE REGULATORY AUTHORITY, PANCHKULA.

Mini Secretariat (2nd and 3rd Floor). Sector-1, Panchkula.
Telephone No: 0172-2584232, 2585232
E-mail: officer.rera.hry@gmail.com, hrerapkl-hry@gov.in
Website: www.haryanarera.gov.in

**Extract of the resolution passed by the Haryana Real Estate Regulatory Authority, Panchkula in its meeting held on 24.06.2026.**

**Item No. 323.51**

**Representation for amendment in the payment plan approved during project registration, and prayer to approve the Promoter's proposed Construction-Linked Payment Plan in conformity with the Affordable Housing Policy, 2013, the RERA Act, 2016, and the Haryana RERA Rules, 2017 – Advitya Homes-2.**

**Promoter:** **Advitya Residency LLP.**

**Project:** **"Advitya Homes-2", an Affordable Group Housing Colony on additional land measuring 3.04375 acres having an FAR of 28979.169 sq mtrs. (27951.244 sq mtrs. residential and 1027.925 sq. mtrs. commercial) situated in the revenue estate of Village Sikri, Sector-143, Tehsil Ballabgarh, Faridabad.**

**Reg. No.:** **HRERA-PKL-FBD-883-2026 dated 09.04.2026 valid upto 31.12.2029.**

**Temp ID:** **RERA-PKL-1989-2026.**

**Present:** **Adv. Tarun Ranga on behalf of the promoter.**

1. The Authority had granted registration to the above mentioned project on 09.04.2026 with following payment plan:-

| S. No. | Installment | Percentage |
|---|---|---|
| 1 | At the Time of Booking | 5% |
| 2 | Upon Allotment and Issuance of Builder Buyer Agreement (with 30 days after booking/allotment as per AGH policy) | BBA will get issued |
| 3 | On Start of Casting of Raft of the Tower | 10% |
| 4 | On start of 4th Floor Slab | 10% |
| 5 | On start of 10th Floor Slab | 10% |
| 6 | On Super Structure | 10% |
| 7 | On start of internal Brick Works & Electrical Infrastructure | 10% |
| 8 | On Start of Internal Plaster Works & External Plaster Works | 10% |
| 9 | On Start of Paint & Fire Fighting Works | 10% |

| | | |
|---|---|---|
| 10 | On Start of Sewerage / Storm Water / Water Lines Works | 10% |
| 11 | On Start of External Development Work (External Electrification, Green, Pavers, Roads, Street Light, Etc.) | 10% |
| 12 | On Offer of Possession | 5% |

Possession Charges

| | | |
|---|---|---|
| 1 | GAS Meter | ₹ 1600/- |
| 2 | Prepaid Meter Charges | ₹ 5000/- |
| 3 | Electricity Meter Charges | ₹ 30,000 + GST |
| 4 | Meter Charges | ₹ 10,000 + GST |
| 5 | Utility Charges | ₹ 12,000 + GST |
| 6 | Interest Free Maintenance Charges | ₹ 15,000/- |

Advitya Residency LLP vide letter dated 07.05.2026 has submitted a representation for amendment in the Construction-Linked Payment Plan as approved by the Authority while granting registration of the above project. The payment plan which was approved departs from the Affordable Housing Policy, 2013, in two substantive respects: the allotment-stage collection has been reduced from 25% to 15%, and the milestone sequencing has been revised in a manner inconsistent with the actual construction methodology being followed on site. The grounds for this representation are set out below.

**THE THREE PAYMENT PLANS- A COMPARATIVE STATEMENT**

| Sr. | Milestone | Filed by Advitya (%) | Approved in Registration (%) | Proposed by Advitya (Revised Plan) |
|---|---|---|---|---|
| 1 | At the time of Booking | 5% | 5% | 5% |
| 2 | Upon execution of Builder Buyer Agreement (within 30 days of allotment) | 10% | 10% | 20% ← Key Revision (AHP mandates 25% at allotment) |
| 3 | On Start of Casting of Raft / Stilt Floor | 10% (Raft) | 10% (Raft) | 10% (Stilt) |
| 4 | Milestone — Lower Floors | 10% (2nd Floor Slab) | 10% (4th Floor Slab) | 10% (7th Floor Slab + Internal Brick Work + Internal Fire Fighting) |
| 5 | Milestone — Mid-Rise Floors | 10% (10th Floor Slab) | 10% (10th Floor Slab) | 10% (13th Floor Slab + Internal Brick Work + Internal Fire Fighting) |
| 6 | Super Structure | 10% (Stage 9 — later stage) | 10% (Stage 6 — advanced) | 10% (Super Structure + Internal Brick Work + Internal Fire Fighting) |
| 7 | Internal Plaster & External Plaster Works | 10% | 10% | 10% |
| 8 | Paint Work | 10% (Paint + Fire Fighting) | 10% (Paint + Fire Fighting) | 10% (Paint + Electrical Infrastructure) |

Haryana Real Estate Regulatory Authority * Panchkula

| | | | | |
|---|---|---|---|---|
| 9 | External Development Works | 10% | 10% | 10% |
| 10 | Offer of Possession | 5% | 5% | 5% |
| | **TOTAL** | **100%** | **100%** | **100%** |

Differences: -

The BBA stage payment: The Promoter now proposes again 20%, bringing total allotment stage collection to 25% which is expressly permitted under the Affordable Housing Policy, 2013. The approved payment plan mentions 10%, restricting total allotment-stage collection to 15%.

Super Structure installment timing: The Promoter placed this at Stage 9 in the original filing (appropriate for a 19-floor tower) and at Stage 6 in the revised plan. The approved plan advances it to Stage 6, which in a sequential template implies super structure completes before internal brick and finishing works which is contrary to Maiwan practice.

Integration of internal works: The Promoter's revised plan integrates internal brick work and internal fire fighting with each floor milestone, reflecting the concurrent Maiwan construction sequence. The approved plan treats them as separate subsequent activities.

## II. THE AFFORDABLE HOUSING POLICY IS THE GOVERNING INSTRUMENT

1. **Background and Legal Status of the AHP**The Affordable Housing Policy, 2013 (AHP) was notified by the Government of Haryana pursuant to powers vested in the DTCP under the Haryana Development and Regulation of Urban Areas Act, 1975 (HDURA). It is a specific, purpose-built policy for affordable housing projects and constitutes the foundational framework within which DTCP licenses of this nature are issued. The license granted to the Promoter under License No. 53 of 2025 expressly requires compliance with the AHP. The AHP is, for this project, the governing instrument or, the 'bible'.

2. **The AHP's Evolution and Why 25% at Allotment Was Retained**

   When the AHP was first notified in 2013, the payment plan was entirely timeline-linked. Following the enactment of the Real Estate (Regulation and Development) Act, 2016 and the Haryana RERA Rules, 2017, the AHP payment structure was amended to provide for a construction-linked plan for the residual 75% but the initial 25% at the time of allotment was consciously and deliberately retained.

3. **Section 13 of the RERA Act**

   Section 13 tells developers what they cannot do before the BBA is signed. It is silent on what the AHP-mandated 25% (of which 10% is the booking amount already within Section 13, and 15% is collected at BBA execution) comprises.

4. **Principle of Harmonious Construction**

   The RERA Act is a Central legislation of general application to the real estate sector. The AHP is a state policy of specific application to affordable housing. The Policy's specific mandate of 25% at allotment prevails over any general administrative

Haryana Real Estate Regulatory Authority Panchkula practice that RERA authorities may have developed for other categories of projects under different policy. The two instruments must be read harmoniously and, on this point, harmonious reading <u>leads to only one conclusion</u>: the 25% must be restored.

**III. THE SUPER STRUCTURE INSTALLMENT (TIMING IS DICTATED BY TOWER HEIGHT AND CONSTRUCTION METHODOLOGY)**

The approved plan places the Super Structure installment at Stage 6 that is, immediately after the 10th Floor Slab milestone. The Promoter submits that this placement is based on an assumption that is factually incorrect for th1S project, for two distinct reasons.

**A. Tower Has 19 Floors (Super Structure at Stage 6 is Premature)**

Each tower in Advitya Homes-2 has 19 slabs. The term 'Super Structure' in construction parlance refers to the completion of the entire above-ground structural frame i.e. all slabs, columns, beams ›and the terrace slab. In a 19-floor building, reaching the 10th floor slab represents approximately the midpoint of the structural work. Calling for a Super Structure installment at that stage misrepresents the progress actually achieved and effectively treats a mid-construction milestone as a near-completion event.

In the Promoter's original filing, the Super Structure installment was placed at Stage 9 i.e., after substantial structural and concurrent infernal work had been completed In the revised proposed plan, it is placed at Stage 6 but with the explicit integration of internal brick work and firefighting alongside it, ensuring that the payment corresponds to a genuinely advanced stage of construction. The approved plan, by placing Super Structure at Stage 6 without any such qualification, does not account for the remaining 9 floors of structural work that follow.

**B. Fire Fighting Norms (Internal Systems Must Be Installed Before Tiling)**

The project is subject to fire safety norms that require internal fire fighting systems to be installed within each residential unit. These systems i.e. sprinkler pipes, fire risers, and related infrastructure must be laid before floor tiling is done, because once tiles are fixed, accessing the flooring to route piping causes breakage and significant damage. This is not a matter of construction preference; it is a technical and regulatory requirement.

The consequence is that internal fire fighting work within the apartments must proceed floor by floor, embedded within the construction sequence, not as a separate finishing activity after the super structure is complete. The Promoter's revised payment plan accounts for this by including internal fire fighting as a component of each floor milestone. The approved plan, by scheduling 'Paint and Fire Fighting' as Stage 9 (after all structural and brick work stages are done), assumes a sequential approach that is incompatible with the technical requirements described above.

Haryana Real Estate Regulatory Authority ★ Panchkula ★

## IV. MAIWAN CONSTRUCTION METHODOLOGY (INTERNAL WORKS ARE AN INTEGRAL PART OF THE STRUCTURAL PHASE)

The project is being constructed using the Maiwan integrated construction methodology. The approved plan appears to be premised on a traditional sequential construction model that does not reflect Maiwan practice.

The approved plan with 'Internal Brick Work and Electrical Infrastructure' as Stage 7 and 'Paint and Fire Fighting' as Stage 9, following Super Structure at Stage 6 is a textbook sequential plan. At a Maiwan site, brickwork and electrical works are substantially complete on lower floors while the upper floors are still being cast. Assigning separate payment milestones for activities that, in Maiwan, have already been completed as part of earlier stages, produces a payment plan that does not correspond to the actual status of work.

THE PROMOTER'S FINANCIAL POSITION CRORES INVESTED BEFORE, ANY ALLOTTEE PAYMENT)

The Authority's concern w.r.t. front-loaded payment plans is understandable in the general context of real estate regulation. The Promoter does not dispute the legitimacy of that concern. What the Promoter submits is that this concern is factually inapplicable to the present project, as the following financial position demonstrates.

As on date, the Promoter has fully paid the cost of land and the External Development Charges (EDC) together amounting to approximately ₹ 12 Crores from its own funds, against a total project cost of approximately ₹ 71 Crores.

-This pre-investment has been made before any allottee has made any payment whatsoever. The ₹ 12 Crores represents the Promoter's skin in this project, committed before a single unit was sold.

-The Maiwan shuttering sets are being procured in the coming months another significant capital expenditure that must be financed from the Promoter's own resources before allottee collections can meaningfully begin.

-As is evidenced by the Cash Flow Statement submitted to the Authority, the Promoter's Contribution column shows this pre-investment as a Day-I inflow, with repayment reflected only towards the end of the project not during construction. In other words, the Promoter is not recovering this investment from allottee collections; it is being funded through to project completion.

**Prayer:-**

a. Reconsider and set aside the payment plan as approved during registration of HRERA-PKL-FBD-883-2026, which is contrary to the Affordable Housing Policy, 2013 and does not reflect the construction methodology and financial structure of this project.

b. Approve and register the Promoter's revised Construction-Linked Payment Plan as proposed, with 25% collectible at the allotment/BBA stage (5% at booking and 20% at BBA execution), in accordance with the AHP's express provision.

Haryana Real Estate Regulatory Authority Panchkula

c. Accept the Promoter's revised milestone structure which integrates internal brick work and fire fighting with floor-level milestones and places Super Structure appropriately for a 19-floor Maiwan project as reflecting the actual sequence of work on site.

d. Pass such other order or direction as this Authority may deem fit in the interest of justice, the intent of the RERA Act, and the viability of affordable housing development in Haryana

2. Today, the Authority was of the view that payment plan should adhere to the RERA Act and Rules framed thereunder. Adv. Tarun ranga appearing on behalf of the promoter informed that they are submitting fresh payment plan in the registry of the Authority mentioning the payment schedule as under:-

| S. No. | Installment | Percentage |
|---|---|---|
| 1. | At the Time of Booking | 5% of Total sales Price |
| 2. | At the Time of Allotment | 5% of Total sales Price |
| 3. | After execution of BBA within 30 days | 15% of Total sales Price |
| 4. | On Start of Casting of Raft of the Tower | 10% of Total sales Price |
| 5. | On start of 5th Slab with internal electrical, plumbing and fire fighting works | 10% of Total sales Price |
| 6. | On start of 13th Slab with internal electrical, plumbing and fire fighting works | 10% of Total sales Price |
| 7. | On completion of Super Structure | 10% of Total sales Price |
| 8. | On start of Paint Works & Electrical Infrastructure | 15% of Total sales Price |
| 9. | On Start of External Development Work (Sewer, Storm, Roads, Streets, Lights etc.) | 15% of Total sales Price |
| 10. | On Offer of Possession | 5% of Total sales Price |

Possession Charges

| | | |
|---|---|---|
| 1 | GAS Meter | ₹ 1600/- |
| 2 | Prepaid Meter Charges | ₹ 5000/- |
| 3 | Electricity Connection Charges | ₹ 30,000 + GST |
| 4 | Meter Charges | ₹ 10,000 + GST |
| 5 | Utility Charges | ₹ 12,000 + GST |
| 6 | Interest Free Maintenance Charges | ₹ 15,000/- |

3. The Authority after consideration decided to take the above payment plan on record the same be uploaded on the web portal of the Authority. **Disposed of.**

Haryana Real Estate Regulatory Authority
Despatch No. 1821
Date 22/7/26
PANCHKULA

True copy

Secretary (Acting),
HRERA, Panchkula

A copy of the above is forwarded to Advisor, HRERA Panchkula, for information and taking further action in the matter.

23/7/26
STP

6/6

23/07

CA-Kakul

Kall