

Hearing brief for project registration u/s 4

S.No	Particulars	Details	
1.	Name of the project	Reach The Stariia	
2.	Name of the promoter	M/s Reach Promoters Pvt. Ltd.	
3.	Nature of the project	Commercial Colony	
4.	Location of the project	Sector-68, Gurugram	
5.	Legal capacity to act as a promoter	License Holder	
6.	Name of license holder	M/s Reach Promoters Pvt. Ltd.	
7.	Status of project	New	
8.	Whether registration applied for whole/phase	Whole Project	
9.	Completion date as mentioned in REP-II	OC: 30.09.2032 CC: 31.12.2032	
10.	Online application ID	RERA-GRG-PROJ-1962-2025	
11.	License no.	150 of 2022 dated 28.09.2022 17 of 2010 dated 13.02.2010	valid upto 27.09.2027 valid upto 12.02.2030
12.	Total licensed area	8.93750 acres	Area to be registered 2.84375 acres (11508.230 sqm)
Note: <ul style="list-style-type: none"> ➤ License No. 150 of 2022 dated 28.09.2022 was granted to Reach Promoters Pvt. Ltd. for setting up a Commercial Colony over 6.95 acres in Sector 68, Gurugram (in addition to 6.26 acres under License No. 17 of 2010). ➤ The company requested to migrate 4.1125 acres of this land under the Migration Policy dated 18.02.2016 in DTCP, Haryana from Commercial Colony to Commercial Plotted Colony. ➤ The request was accepted, and this migrated area has been brought under License No. 138 of 2024 dated 05.11.2024 for a Commercial Plotted Colony. ➤ Two parcels of land (OK-03M and OK-01M of khasra nos. 122//24 & 134//1/2) were excluded from License No. 150 of 2022 due to non-compactness. ➤ As a result, the area under License No. 150 of 2022 is now reduced to 2.84375 acres. ➤ Therefore, the promoter is applying for 2.84375 acres for registration under section 4 of the Act. 			
13.	QPR Compliances	Not applicable	
14.	4(2)(I)(D) Compliances	Not applicable	
15.	4(2)(I)(C) Compliances	Not applicable	
16.	Status of change of bank account (if applicable)	Not applicable	
17.	Details of proceedings pending against the project	Not applicable	
18.	RC Conditions Compliances	Not applicable	
19.	Number of Towers	5 th floor to 19 th floor	
20.	Number of units	165 Office units	

**HARERA****GURUGRAM**

Reach The Stariia

RERA-GRG-PROJ-1962-2025

21.	Total Project cost	Rs 749.33 Cr.		
22.	Project expenditure so far	Rs 177.35 Cr.		
23.	Estimated expenditure for completion so far	Rs 571.98 Cr.		
24.	Statutory approvals either applied for or obtained prior to registration			
	S.No	Particulars	Date of approval	Validity up to
	i)	License Approval	150 of 2022 dated 28.09.2022 17 of 2010 dated 13.02.2010	valid upto 27.09.2027 valid upto 12.02.2030
	ii)	Revised Demarcation - cum-Zoning plan approval	DRG No. DTCP- 10970 dated 27.03.2025	
	iii)	Revised building plan approval	Memo no. ZP-603-III/PA(DK)/2025/21139 dated 05.06.2025	04.06.2030
	iv)	Environmental Clearance	EC24B3813HR5366508N dated 31.08.2024	30.08.2034
	v)	Fire scheme approval	Memo no. FS/2025/890 dated 25.06.2025	
	vi)	Airport height clearance	AAI/NHQ/NR/ATM/NOC/2024/277 /1061-64 dated 24.04.2024	22.04.2032
	vii)	Service plan and estimate approval	Memo no. LC-1900-B/JE(RK)/2025/24734 dated 01.07.2025	
	viii)	Electrical load availability connection	Memo no. Ch-61/ Drg. -26B dated 22.11.2024	
25.	Fee details			
	Registration fee	Commercial: 49849.001 *4.33* 20 = Rs 43,16,923/-		
	Processing fee	49849.001 * 10 = Rs 4,98,490/-		
	Late fee	Not applicable		
	Total	Rs 48,15,413/-		
26.	DD amount	Rs 31,41,000/- Rs 16,74,413/-		
	DD no. and date	830958 dated 04.06.2025 831001 dated 10.07.2025		
	Name of the bank issuing	Kotak Mahindra Bank		
	Deficient amount	Nil		
27.	File Status	Date		
	File received on	09.06.2025		
	First notice Sent on	03.07.2025		
	1 st hearing on	07.07.2025 (adjourned)		
	2 nd hearing on	14.07.2025		
23.	Case History: - ➤ The Promoter M/s Reach Promoters Pvt. Ltd. who is a license holder applied for the registration of real estate commercial project namely "Reach The Stariia" located at			



Sector-68, Gurugram under section 4 of the Real Estate (Regulations and Development) Act, 2016.

- License No. 150 of 2022 dated 28.09.2022 was granted to M/s Reach Promoters Pvt. Ltd. for setting up a Commercial Colony over 6.95 acres in Sector 68, Gurugram (in addition to 6.26 acres under License No. 17 of 2010).
- The company requested to migrate 4.1125 acres of this land under the Migration Policy dated 18.02.2016 in DTCP, Haryana from Commercial Colony to Commercial Plotted Colony. The request was accepted, and this migrated area has been brought under License No. 138 of 2024 dated 05.11.2024 for a Commercial Plotted Colony. Two parcels of land (OK-03M and OK-01M of khasra nos. 122//24 & 134//1/2) were excluded from License No. 150 of 2022 due to non-compactness. **As a result, the area under License No. 150 of 2022 is now reduced to 2.84375 acres. Therefore, the promoter is applying for 2.84375 acres for registration under section 4 of the Act.**
- Whereas, it is noticed that with respect to the license no. 17 of 2010, the promoter stated that the said license, prior to migration was 6.26 acres (only 2.69 % area i.e., 0.1688 acres is migrated). The project under the said license was developed in two parts, one office complex and the other retail complex. The OC of the office area was issued by DTCP vide memo no. ZP-603/SD(BS)/2017/18007 dated 27.07.2017 which is prior to the commencement of Rules, 2017. Further, the OC of retail complex is issued by DTCP vide memo no. ZP-603-Vol-II/SD(DK)/2019/19762 dated 16.08.2019 & memo no. ZP-603-Vol-IV/PA(DK)/2025/24726 dated 01.07.2025, however, no third-party rights have been created in the retail area. The project is in self-occupancy and shall be on lease model.
- After scrutinizing the application for registration of commercial project the 1st deficiency notice vide notice no. HARERA/GGM/RPIN/922 dated 09.06.2025 was issued to the promoter with an opportunity of being heard on 07.07.2025.

On 07.07.2025, The matter is adjourned and to come up on 21.07.2025.

The public notice was published in 3 leading newspapers 1 Hindi and 2 English on 18.06.2025 namely Dainik Jagaran, The Tribune & The Hindu. Whereas, no objection has been received till 30.06.2025.

As per the directions of the authority, the PE and CA conducted a site visit on 19.06.2025. The site is well connected via a 60-meter-wide road and then 12-meter-wide service road. At present, on site mining work is in progress till basement 3.

Furthermore, essential services such as water supply, sewerage, stormwater drainage, and electricity have already been assured by the concerned departments as on date.

The promoter has submitted an undertaking stating that the promoter has not advertised, marketed booked, or sold any unit falling under the project.

In the reply dated 10.07.2025, the promoter stated that they are applying to register the office complex only i.e. 5th Floor to 19th floor in the name of "Reach The Stariia". Whereas, the left-out area under license no. 150 of 2022 is a retail complex for which promoter has submitted the affidavit stating that the retail complex will be on lease/ rental model. Further, the promoter also undertake that they will not book, sale or offer for sale or advertise or market to sell the area/ unit proposed to be developed under retail complex under license no. 150 of 2022 and 17 of 2010, till receiving the completion certificate or before registering the real estate project with the HARERA, Gurugram.



The status of the documents is mentioned below:

<p>24. Present compliance status as on 14.07.2025 of deficient documents conveyed vide deficiency notice dated 03.07.2025</p>	<ol style="list-style-type: none"> License No. 150 of 2022 dated 28.09.2022 was granted in addition to License No. 17 of 2010. Further, area measuring 4.1125 acres has been migrated to license no. 138 of 2024 and two parcels of land were excluded from License No. 150 of 2022 thus reducing area under license no. 150 of 2022 to 2.84375 acres You are, therefore, required to provide the earlier approved building plans/layout plan with respect to license no. 150 of 2022 & 17 of 2010 and clarify the status of RERA registration, advertisement, marketing, booking, sale, and offer for sale made in any manner based on the above licenses. The promoter shall be liable to pay the deficit fee, if applicable. Status: The earlier approved building plan has been submitted. The promoter states that, prior to migration, the said license covered an area of 6.26 acres, of which only 2.69% (i.e., 0.1688 acres) was migrated. The project under this license was developed in two parts one office complex and the other a retail complex. The Occupation Certificate (OC) for the office area was issued by DTCP vide memo no. ZP-603/SD(BS)/2017/18007 dated 27.07.2017, which was prior to the commencement of the RERA Rules, 2017. Subsequently, the OC for the retail complex was issued by DTCP vide memo no. ZP-603-Vol-II/SD(DK)/20191/19762 dated 16.08.2019 and memo no. ZP-603-Vol-IV/PA(DK)/2025/24726 dated 01.07.2025. However, no third-party rights have been created in the retail area, which is intended for self-occupancy and shall operate on a lease model. Since no sale is proposed in the retail area, no deficit fee/ late fee is applicable. Further, with respect to the licensed area under License No. 150 of 2022, the promoter has stated that only the 5th to 19th floors of the office complex will be sold. The retail complex will continue to remain under the lease model. Accordingly, an affidavit regarding the same, along with a no sale affidavit under License No. 150 of 2022 and 17 of 2010, has been submitted. Only the office complex under License No. 17 of 2010 has been sold, and that too before the commencement of the RERA Act, 2016. It is noted that the total licensed land under License No. 150 of 2022 and 17 of 2010 is 8.93750 acres. However, the promoter is applying for only 2.84375 acres as per the approved site plan, whereas no phasing has been approved in this project by DTCP, Haryana. Therefore, you are required to clarify the area applied for registration in the current application and the reason of not applying for registration of the balance area. Status: The promoter has stated that the area falling under License No. 17 of 2010 (measuring 6.26 acres) has already
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	<p>been developed, and the Occupation Certificates (OCs) have been issued by DTCP, Haryana on 27.07.2017, 16.08.2019 & 01.07.2025. The retail complex is being operated under a lease model, whereas the sale in the office complex was carried out prior to the commencement of the RERA Act, 2016. Therefore, the promoter is not registering the same, as no further sale is proposed in either the retail or office complex.</p> <p>Further, with respect to the area under the additional license (License No. 150 of 2022), the promoter intends to sell only the office complex. Accordingly, in the reply dated 10.07.2025, the promoter has stated that they wish to revise their application to register only the office complex. The retail complex falling under License No. 150 of 2022 will continue to remain on a lease model. In support of this, the promoter has submitted an affidavit stating that the retail complex will not be sold at any point in the future.</p> <p>3. Deficit fee of Rs 16,74,413/- needs to be submitted. The fee is calculated as per proposed FAR. Further, if there is any change in the applied area then the fee will be recalculated and then the promoter shall be liable to pay the deficit fee, if any. Status: Submitted Rs 16,74,413/- vide DD no. 831001 dated 10.07.2025, and the deficit fee was calculated as per original application submitted by the promoter i.e. for 2.84375 acres.</p> <p>4. The annexures in the online application are not uploaded as well as the correction needs to be done in the online (A-H) application. Status: Submitted, but corrections need to be done.</p> <p>5. License no. 17 of 2010 needs to be submitted along with copy of LOI, LC IV and LC IV B duly stamped and signed by the Director, Town and Country Planning. Status: Submitted</p> <p>6. Online DPI needs to be corrected. Status: Submitted, but corrections need to be done.</p> <p>7. As there are revisions in the building plans, the changes made in the revised plans must be submitted in tabular form and clearly marked on the site plan. A clarification regarding revision in the building plan should also be submitted. Status: The revision in the building plan is due to addition of license no. 150 of 2022 and migration of area measuring 4.1125 acres from license no. 150 of 2022 dated 28.09.2022 and area measuring 0.1688 acres from license no. 17 of 2010 dated 13.02.2010 also at lower ground floor the site plan was revised against which OC has already been received vide memo no. ZP-603-Vol-IV/PA(DK)/2025/24726 dated 01.07.2025, other than</p>
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	<p>that, the promoter has stated that there are no changes in the site plan as of date.</p> <p>8. Two-thirds consent of the existing allottees for the revision of building plans needs to be submitted including the list of two third allottees after incorporating details of unique allottees along with their contact details and date of booking needs to be submitted. Status: As per the details provided by the promoter, 31 units have been sold in the office complex under License No. 17 of 2010, out of which there are 21 unique allottees. The consents provided by the promoter have been verified.</p> <p>9. Revised Demarcation – cum-Zoning plan approval needs to be submitted. Status: Submitted</p> <p>10. Approved Service plan and estimates needs to be submitted. If applied, then copy of the same needs to be submitted. Status: Submitted</p> <p>11. Electrical load availability connection needs to be submitted for whole area. Status: Submitted</p> <p>12. Fire scheme approval needs to be submitted. Status: Submitted</p> <p>13. Aks- shijra duly certified by revenue officer not more than 6 months prior to the date of application needs to be revised as the certify date is not visible. Status: Submitted</p> <p>14. Project report along with brochure of current project and project photos needs to be submitted. Status: Submitted, but needs to be revised.</p> <p>15. Land title search report of 30 years for whole licensed land needs to be submitted after including bar enrolment number of the advocate. Status: Submitted</p> <p>16. The site plan superimposed on the demarcation plan needs to be submitted. Status: Submitted</p> <p>17. PERT Chart specifying date of completion needs to be submitted. Status: Submitted, but needs to be revised.</p> <p>18. Draft allottees documents i.e. application form, allotment letter, builder buyer agreement, conveyance deed & payment receipt needs to be submitted as per prescribed format. Status: Submitted, but needs to be revised.</p> <p>19. Draft brochure and advertisement need to be submitted. Status: Submitted</p> <p>20. It is observed that while scrutiny of the application in letter head of the company promoter is using name of the "Airia by Reach & Lakeshore" which needs to be clarified.</p>
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	<p>Status: Submitted</p> <p>21. Cost of the land amounts to Rs 3448.41 lakhs needs to be clarified according to the area applied for the registration is 2.84375 acres. Status: Submitted, but needs to be revised as per amended application.</p> <p>22. Details of any other cost amounts to Rs 6451.93 lakhs and financial resources amounts to Rs 20000 lakhs mentioned in DPI needs to be submitted. Status: Submitted, but needs to be revised as per amended application.</p> <p>23. Original NEC dated 11-04-2025 needs to be submitted. Status: Submitted but needs to be revised as per amended application.</p> <p>24. Following Original CA Certificate needs to be submitted: CA Certificate of non-default dated 06.06.2025, CA Certificate of net worth dated 06.06.2025, CA Certificate of REP-1 (A-H) dated 06.06.2025, and CA Certificate of expenditure incurred and to be incurred dated 06.06.2025. Status: Submitted, but needs to be revised as per amended application.</p> <p>25. Original Bank Undertaking dated 29.05.2025 needs to be submitted. Status: Submitted</p> <p>26. REP II, Affidavit of promoter regarding arrangement with the bank of master account under section 4(2)(I)(D) and Affidavit of promoter regarding no loan needs to be revised. Status: Submitted, but needs to be revised as per amended application.</p> <p>27. Quarterly net cash flow, quarterly estimated expenditure and quarterly fund flow statement needs to be revised. Status: Submitted, but needs to be revised as per amended application.</p> <p>28. Land detail of license no. 17 of 2010 along with CA certificate of list of units sold to the allottees as on date of the application applied for registration u/s 4 which includes name of the allottees, shop no., carpet area, date of booking, average rate, and total consideration (along with paid amount and pending amount) needs to be submitted. Status: Submitted, but needs to be revised as per amended application.</p> <p>29. Details regarding the association with Lake Shore Retail Venture Fund, along with supporting documents related to the use of the trademark 'AIRIA'. Status: Not Submitted</p>
Remarks	<p>1. License No. 150 of 2022 dated 28.09.2022 was granted in addition to License No. 17 of 2010. Further, area measuring</p>



		<p>4.1125 acres has been migrated to license no. 138 of 2024 and two parcels of land were excluded from License No. 150 of 2022 thus reducing area under license no. 150 of 2022 to 2.84375 acres</p> <p>You are, therefore, required to provide the earlier approved building plans/layout plan with respect to license no. 150 of 2022 & 17 of 2010 and clarify the status of RERA registration, advertisement, marketing, booking, sale, and offer for sale made in any manner based on the above licenses. The promoter shall be liable to pay the deficit fee, if applicable.</p> <p>Status: The earlier approved building plan has been submitted. The promoter states that, prior to migration, the said license covered an area of 6.26 acres, of which only 2.69% (i.e., 0.1688 acres) was migrated. The project under this license was developed in two parts one office complex and the other a retail complex.</p> <p>The Occupation Certificate (OC) for the office area was issued by DTCP vide memo no. ZP-603/SD(BS)/2017/18007 dated 27.07.2017, which was prior to the commencement of the RERA Rules, 2017. Subsequently, the OC for the retail complex was issued by DTCP vide memo no. ZP-603-Vol-II/SD(DK)/20191/19762 dated 16.08.2019 and memo no. ZP-603-Vol-IV/PA(DK)/2025/24726 dated 01.07.2025. However, no third-party rights have been created in the retail area, which is intended for self-occupancy and shall operate on a lease model. Since no sale is proposed in the retail area, no deficit fee/ late fee is applicable.</p> <p>Further, with respect to the licensed area under License No. 150 of 2022, the promoter has stated that only the 5th to 19th floors of the office complex will be sold. The retail complex will continue to remain under the lease model. Accordingly, an affidavit regarding the same, along with a no sale affidavit under License No. 150 of 2022 and 17 of 2010, has been submitted. Only the office complex under License No. 17 of 2010 has been sold, and that too before the commencement of the RERA Act, 2016.</p> <p>2. It is noted that the total licensed land under License No. 150 of 2022 and 17 of 2010 is 8.93750 acres. However, the promoter is applying for only 2.84375 acres as per the approved site plan, whereas no phasing has been approved in this project by DTCP, Haryana. Therefore, you are required to clarify the area applied for registration in the current application and the reason of not applying for registration of the balance area.</p> <p>Status: The promoter has stated that the area falling under License No. 17 of 2010 (measuring 6.26 acres) has already been developed, and the Occupation Certificates (OCs) have been issued by DTCP, Haryana on 27.07.2017 and 16.08.2019. The retail complex is being operated under a</p>
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	<p>lease model, whereas the sale in the office complex was carried out prior to the commencement of the RERA Act, 2016. Therefore, the promoter is not registering the same, as no further sale is proposed in either the retail or office complex.</p> <p>Further, with respect to the area under the additional license (License No. 150 of 2022), the promoter intends to sell only the office complex. Accordingly, in the reply dated 10.07.2025, the promoter has stated that they wish to revise their application to register only the office complex. The retail complex falling under License No. 150 of 2022 will continue to remain on a lease model. In support of this, the promoter has submitted an affidavit stating that the retail complex will not be sold at any point in the future.</p> <p>3. The annexures in the online application are not uploaded as well as the correction needs to be done in the online (A-H) application.</p> <p>4. Online DPI needs to be corrected.</p> <p>5. As there are revisions in the building plans, the changes made in the revised plans must be submitted in tabular form and clearly marked on the site plan. A clarification regarding revision in the building plan should also be submitted.</p> <p>Status: The revision in the building plan is due to addition of license no. 150 of 2022 and migration of area measuring 4.1125 acres from license no. 150 of 2022 dated 28.09.2022 and area measuring 0.1688 acres from license no. 17 of 2010 dated 13.02.2010 also at lower ground floor the site plan was revised against which OC has already been received vide memo no. ZP-603-Vol-IV/PA(DK)/2025/24726 dated 01.07.2025, other than that, the promoter has stated that there are no changes in the site plan as of date.</p> <p>6. Two-thirds consent of the existing allottees for the revision of building plans needs to be submitted including the list of two third allottees after incorporating details of unique allottees along with their contact details and date of booking needs to be submitted.</p> <p>Status: As per the details provided by the promoter, 31 units have been sold in the office complex under License No. 17 of 2010, out of which there are 21 unique allottees. The consents provided by the promoter have been verified.</p> <p>7. Project report along with brochure of current project and project photos needs to be submitted.</p> <p>8. PERT Chart specifying date of completion needs to be submitted.</p>
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	<p>9. Draft allottees documents i.e. application form, allotment letter, builder buyer agreement, conveyance deed & payment receipt needs to be submitted as per prescribed format.</p> <p>10. Cost of the land amounts to Rs 3448.41 lakhs needs to be clarified according to the area applied for the registration is 2.84375 acres.</p> <p>11. Details of any other cost amounts to Rs 6451.93 lakhs and financial resources amounts to Rs 20000 lakhs mentioned in DPI needs to be submitted.</p> <p>12. Original NEC dated 11-04-2025 needs to be submitted.</p> <p>13. Following Original CA Certificate needs to be submitted: CA Certificate of non-default dated 06.06.2025, CA Certificate of net worth dated 06.06.2025, CA Certificate of REP-1 (A-H) dated 06.06.2025, and CA Certificate of expenditure incurred and to be incurred dated 06.06.2025.</p> <p>14. REP II, Affidavit of promoter regarding arrangement with the bank of master account under section 4(2)(I)(D) and Affidavit of promoter regarding no loan needs to be revised.</p> <p>15. Quarterly net cash flow, quarterly estimated expenditure and quarterly fund flow statement needs to be revised.</p> <p>16. Land detail of license no. 17 of 2010 along with CA certificate of list of units sold to the allottees as on date of the application applied for registration u/s 4 which includes name of the allottees, shop no., carpet area, date of booking, average rate, and total consideration (along with paid amount and pending amount) needs to be submitted.</p> <p>17. Details regarding the association with Lake Shore Retail Venture Fund, along with supporting documents related to the use of the trademark 'AIRIA'.</p>
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Ashish

(Ashish Dubey)

Chartered Accountant

Deepika

(Deepika)

Planning Executive

Day and Date of hearing

Monday and 14.07.2025

Proceeding recorded by

Ram Niwas

PROCEEDINGS OF THE DAY

Proceedings dated: 14.07.2025

Ms. Deepika, Planning Executive and Sh. Ashish Dubey, Chartered Accountant briefed about the facts of the project.

Sh. Srinivasulu Dasari (AR), Sh. Deepak Sethi (AR) and Sh. Sharad Mohan Tiwari (AR) are present on behalf of the promoter.

M/s Reach Promoters Pvt. Ltd. was granted License No. 150 of 2022 dated 28.09.2022 for developing a commercial colony over 6.95 acres in Sector 68, Gurugram, in addition to the previously granted License No. 17 of 2010 for an area of 6.26 acres. Subsequently, the promoter applied to migrate 4.1125 acres from License No. 150 of 2022 and 0.1688 acres from License No.17 of 2010 to a Commercial Plotted Colony under the Migration Policy dated 18.02.2016 issued by DTCP, Haryana. The request was accepted, and the migrated land was brought under a new License No. 138 of 2024 dated 05.11.2024. Additionally, two



land parcels were excluded from License No. 150 of 2022 due to non-compactness. As a result, the area under License No. 150 of 2022 was reduced to 2.84375 acres, for which the promoter has now applied for registration under Section 4 of the Real Estate (Regulation and Development) Act, 2016 for a commercial project named "Reach The Stariia." However, as per their latest reply dated 10.07.2025, they are seeking registration only for the 5th to 19th floors of the office complex under license no. 150 of 2022.

Upon scrutiny of the application for registration submitted by the promoter, it has come to the notice of the Authority that the applicant-promoter has applied for registration in respect of the additional licensed area under license no. 150 of 2022. However, scrutiny of the revised building plans dated 05.06.2025 reveals that certain areas falling under the earlier License No. 17 of 2010, particularly the setback areas, are also being utilized and developed by the promoter under the additional License No. 150 of 2022. This intermingling of land across both the licenses and the overlapping nature of the construction, brings the entirety of the development under the ambit of one real estate project for the purposes of registration under the Act.

The Authority observes that section 3 of the Act deals with the 'Prior registration of real estate project with the Real Estate Regulatory Authority' and the relevant section is reproduced as under:

"3. Prior registration of real estate project with the Real Estate Regulatory Authority-

(1) No promoter shall advertise, market, book, sell or offer for sale, or invite persons to purchase in any manner any plot, apartment or building, as the case may be, in any real estate project or part of it, in any planning area, without registering the real estate project with the Real Estate Regulatory Authority established under this Act.

Provided that projects that are ongoing on the date of commencement of this Act and for which the completion certificate has not been issued, the promoter shall make an application to the Authority for registration of the said project within a period of three months from the date of commencement of this Act."

Furthermore, the Explanation to section 3 clarifies that:

"Explanation. —For the purpose of this section, where the real estate project is to be developed in phases, every such phase shall be considered a stand-alone real estate project, and the promoter shall obtain registration under this Act for each phase separately."

It is important to emphasize on the proviso to section 3(1) of the Act, which mandates that the registration of the real estate project which are ongoing on the date of commencement of this Act and for which the completion certificate has not been issued within a period of three months from the date of commencement of this Act. The Authority further observes that the aforesaid provisions clearly mandate that either the entire real estate project must be registered as a whole, or if being developed in phases, each phase should be delineated as a standalone project and registered accordingly.

However, in the instant case, the application for registration is neither for the entire real estate project nor for a clearly defined phase that qualifies as a standalone phase under the Act. It is pertinent to mention here that the Applicant-promoter in its application for registration had applied for registration of a certain selective part of a real estate project.

Keeping in view the present factual matrix, the Authority is of the considered view that such selective or partial registration of a real estate project, in this case, confined only to a few floors, does not meet the statutory requirement of section 3 of the Act. The Act does not envisage or permit a promoter to register only a component of a project unless it qualifies as a separate and independent phase, and is developed as such. In the present case, since the building plans indicate integration of development works across licensed areas, registration must necessarily encompass the entire real estate project. Hence,



the contention of the applicant promoter regarding registration of certain part of the real estate project is not permissible in view of the provisions of the Act.

During the proceedings, the Authorized Representative (AR) of the promoter has stated that they are willing to amend their application to cover the entire real estate project under both the Licenses bearing No. 17 of 2010 and 150 of 2022 except the area under occupation certificate of the office area issued by DTCP vide memo no. ZP-603/SD(BS)/2017/18007 dated 27.07.2017 which is prior to the commencement of Rules, 2017. Accordingly, promoter seeks one weeks' time to amend the application for registration. Request allowed.

In light of the above findings and in compliance with the provisions of Section 3 of the Act, the promoter is directed to:

- Amend its application for registration to include the entire real estate project falling under both the License bearing No. 17 of 2010 and 150 of 2022, in its entirety except OC of 2017.
- Deposit deficit fees, late fees as required under the Act, rules and regulations made thereunder.
- Submit other project documentation as required under the Act.

The matter to come up on 21.07.2025.

(Arun Kumar)
Chairman, HARERA