

New PWD Rest House, Civil Lines, Gurugram, Haryana

नया पी. डब्ल्यू. डी. विश्राम गृह, सिविल लाईन्स, गुरुग्राम, हरियाणा

Project - The Skylo Tower
Promoter - M/s St. Patricks Realty Pvt. Ltd.
Hearing brief for registration of Project u/s 4

S.No	Particulars	Details		
1.	Name of the project	The Skylo Tower.		
2.	Name of the promoter	M/s St. Patricks Realty Pvt. Ltd.		
3.	Brief of promoter	M/s St. Patricks Realty Pvt. Ltd. is a real estate company, associated with the Central Park group as per its RERA filings, and engaged in development projects in Gurugram, Haryana. The company is registered under CIN U45200HR2008PTC037964 and operates from Global Business Park, M.G. Road, Gurgaon. Its key personnel include Amrita Bakshi (Managing Director) and Minu Bakshi, and it has an authorised capital of ₹2,00,00,000.		
4.	Nature of the project	Distinct Commercial Component.		
5.	Location of the project	Sector-32, Sohna, Gurugram.		
6.	Legal capacity to act as a promoter	Collaborator.		
7.	Name of the license holder	MLT Propmart Pvt. Ltd.		
8.	Name of the collaborator (if any)	M/s St. Patricks Realty Pvt. Ltd.		
9.	Name of the COD/ BIP (if any)	N/A.		
10.	Status of project	New.		
11.	Whether registration applied for whole	Whole		
	Phase no. applied	N/A		
	Nature of phase	N/A		
12.	Online application ID	RERA-GRG-PROJ-2068-2025		
13.	License no.	13 of 2024 dated 29.01.2024	Valid up to 28.01.2029.	
14.	Total licensed area	4.8284 acres	Area to be registered	3.419 acres
15.	Projected completion date	31.12.2032.		
16.	QPR Compliances (if applicable)	N/A		
17.	4(2)(I)(D) Compliances (if applicable)	N/A		
18.	4(2)(I)(C) Compliances (if applicable)	N/A		
19.	Status of change of bank account	N/A		
20.	Details of proceedings pending against the project	N/A		
21.	RC Conditions Compliances (if applicable)	N/A		
22.	Total Project cost	Rs 620.79 crs		
23.	Project expenditure so far	Rs 24.33 crs		
24.	Estimated expenditure for completion so far	Rs 596.46 crs		
25.	Total no of towers and units	1 no. of tower having 225 units and 42 Shops.		

Email : hareragurugram@gmail.com, reragurugram@gmail.com, **Website :** www.harera.in
 An Authority constituted under section 20 the Real Estate (Regulation and Development) Act, 2016
 Act No. 16 of 2016 Passed by the Parliament

भू-संपदा (विनियमन और विकास) अधिनियम, 2016 की धारा 20 के अर्हत गठित प्राधिकरण
 भारत की संसद द्वारा पारित 2016 का अधिनियम संख्यांक 16

26.	Statutory approvals either applied for or obtained prior to registration			
	S.No	Particulars	Date of approval	Validity upto
	i)	License Approval	1. 54 of 2014 dated 20.06.2014 2. 28 of 2016 dated 23.12.2016. 3. 07 of 2020 dated 29.01.2020. 4. 104 of 2021 dated 10.12.2021. 5. 13 of 2024 dated 29.01.2024.	19.06.2029. 22.12.2026 28.01.2030. 09.12.2026. 28.01.2029.
	ii)	Zoning Plan Approval	DRG. NO. DTCP 10734 dated 27.12.2024.	
	iii)	Building plan Approval	ZP-1143/JD(RA)/2025/29230 dated 30.07.2025.	29.07.2030
	iv)	Environmental Clearance	Not Submitted (Applied on 11.06.2024)	
	v)	Airport height clearance	PALM/NORTH/B/053125/1741 578 dated 10.06.2025	09.06.2033
	vi)	Fire scheme approval	FS/2025/1379 dated 03.10.2025	
	vii)	Service plan and estimate approval	LC-2841-H/JE(SK)/2025/19032 dated 21.05.2025	
27.	Fee Details			
	Registration fee		26,289.717* 1.9 * 20 = Rs 9,99,009/-	
	Processing fee		26,289.717* 10 = Rs 2,62,897/-	
	Late fee		N/A	
	Total		= 9,99,009+ 2,62,897 = Rs 12,61,906/-	
	DD/RTGS amount		Rs. 12,62,000/-	
	DD/RTGS no. and date		015581 dated 27.08.2025 (IndusInd bank)	
	Deficient amount		= 12,61,906- 12,62,000 = Rs -94/- (NIL).	
28.	File Status		Date	
	File received on		24.09.2025	
	Deficiency Notice		08.10.2025	
	Documents Submitted on		10.10.2025	
	First hearing on		13.10.2025	
	Documents Submitted on		23.10.2025, 29.10.2025	
	Second hearing on		03.11.2025 (Adjourned)	
	Third hearing on		24.11.2025 (Adjourned)	
	Documents Submitted on		10.12.2025	
	Fourth hearing on		15.12.2025	
29.	Case History:			
	The Promoter M/s St. Patricks Realty Pvt. Ltd. who is a collaborator applied for the registration of real estate project distinct commercial component namely "The Skylo Tower" located at Sector-32, Sohna, Gurugram under section 4 of the Real Estate (Regulations and Development) Act, 2016 dated			



24.09.2025 and RPIN-965. The Temp I.D. of REP – I (Part A-H) is RERA -GRG-PROJ-2068-2025. The project area for registration is 3.419 acres.

The application for registration of commercial complex was scrutinized and 1st deficiency notice vide notice no. HARERA/GGM/RPIN/965 dated 08.10.2025 was issued to the promoter with an opportunity of being heard on 13.10.2025.

The promoter has published the public notice in three newspapers dated 30.09.2025 i.e., Hindustan Times, The Tribune (English) and Punjab Kesari (Hindi) against which no objections has been received in the Authority.

Proceedings dated: 13.10.2025.

Sh. Shashank Sharma, Associate Engineer Executive and Sh. Ashish Dubey, Chartered Accountant briefed about the facts of the case.

Sh. Saurabh (AR), Sh. Lakshmikant and Ms. Pragya (AR) are present on behalf of the promoter and states that license no 13 of 2024 dated 29.01.2024 valid up to 28.01.2029 has been granted by DTCP in favour of M/s MLT Propmart Pvt. Ltd. in collaboration with M/s St. Patricks Realty Pvt. Ltd and the building plans has been passed by DTCP vide memo no ZP-1143/JD(RA)/2025/29230 dated 30.07.2025 valid up to 29.07.2030 for the development of commercial complex. The Authorized Representatives of the promoter further submits that addendum to the previous collaboration agreement has been done and clause regarding irrevocability has been incorporated in the same. The reply to the remaining deficiencies will be submitted within a period of one week.

The Authority observes that the promoter submitted an application dated 24.09.2025 under Section 4 of the Real Estate (Regulation and Development) Act, 2016 in the Authority for the registration of distinct commercial component. The registration application under consideration pertains to license no. i.e., 13 of 2024 dated 29.01.2024 valid up to 28.01.2029 for land measuring 4.8284 acres issued in favour of M/s MLT Propmart Pvt. Ltd. in collaboration with M/s St. Patricks Realty Pvt. Ltd. for the development of residential plotted colony in addition to the license no 54 of 2014 dated 20.06.2014, 28 of 2016 dated 23.12.2016, 07 of 2020 dated 29.01.2020 and 104 of 2021 dated 10.12.2021 situated in Sector – 29, 30, 32, & 33, Sohna, Gurugram.

Further, the licensed area i.e., 4.8284 acres for development of the residential plotted colony under license No. 13 of 2024 dated 29.01.2024 has not yet been registered with the Authority and the promoter has sought the registration of distinct commercial component for an area admeasuring 3.419 acres, which form part of the aforesaid licensed land for which building plans has been passed by DTCP dated 30.07.2025.

Keeping in view of the aforesaid facts, and submissions made by the Authorized Representative of the promoter, Authority hereby directs the promoter to get the additional license i.e., 13 of 2024 dated 29.01.2024 registered with the Authority first and thereafter distinct commercial component on the said licensed land can be registered. Further promoter is directed to submit the remaining deficiencies in the Authority.

The matter to come up on 03.11.2025.

The promoter has submitted a representation dated 23.10.2025 in the Authority wherein promoter has made the following submissions :-

Layout Features and Saleable Area:

A plotted development colony in Haryana, under the jurisdiction of DTCP, comprises a net planned area divided between residential plots and commercial use, with the remaining area earmarked for

roads, community facilities, and green spaces. The total saleable area cannot exceed 55% of the net planned area—of which residential plots may constitute up to 51% and commercial plots up to 4%.

The development and sale of commercial and residential units in plotted colonies are governed by the Haryana Development and Regulation of Urban Areas Act, 1975 and the Haryana Building Code, 2017. While the approved layout and demarcation plan suffice for the sale of residential plots, commercial blocks within such plotted colonies require separate building plan approval and permissions from DTCP for their development and sale. A single approved layout plan for the colony does not authorize the construction or sale of units within the commercial area.

Applicability of RERA to Commercial Units:

In commercial real estate projects, the registration requirement under RERA applies to the defined saleable component, not merely to the development of land into plots. The focus is on the constructed structure and saleable units, not on the underlying plotted land. Accordingly, separate FAR-based parameters and rates apply to commercial units.

Statutory Definition and Applicability:

As per Section 2(zn) of the Act, a “real estate project” means:

“the development of a building or a building consisting of apartments, or converting an existing building or a part thereof into apartments, or the development of land into plots or apartments, as the case may be, for the purpose of selling all or some of the said apartments or plots or buildings.”

The above definition clarifies that the trigger for registration arises only when plots, apartments, or buildings are offered for sale. Mere development of a plotted colony without sale of individual plots does not independently qualify as a real estate project requiring registration.

In the present case, the layout plan distinctly demarcates a separate commercial parcel, and the only saleable units proposed are commercial shops/building units—not residential plots. Hence, only the commercial block qualifies as a “real estate project” for registration purposes.

Applicability of Section 3 – Sale-Based Obligation:

Section 3(1) of the Act provides that:

“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, without registering the real estate project with the Authority.”

It is therefore evident that the obligation to register arises only for the portion of the project where sale or marketing of units is intended.

Since the promoter is not selling any residential plots under the plotted colony license and seeks registration only for the commercial units constructed on a separately sanctioned commercial block, there is no requirement to first register the plotted development under RERA.

Regulatory Practice and Precedents:

HARERA, Gurugram, has in several instances permitted independent registration of distinct commercial components within plotted colonies without requiring prior registration of the entire plotted development.

For Example, the following registrations were granted under similar factual circumstances:

1. HARERA Registration No. 56 of 2021
2. HARERA Registration No. 12 of 2022

In both cases, the Authority recognized that the plotted license itself was not the saleable component, and accordingly allowed standalone registration of the commercial portion. This established practice



affirms that RERA registration is component-specific, not license-specific, and must be confined to the actual portion being developed and sold.

Non-Serving of Any Regulatory Purpose

The requirement to register the entire licensed land separately would not serve any meaningful purpose, as no obligations exist toward any customer in respect of the plotted portion of the colony. All statutory obligations under the Act would arise only from and be discharged through the commercial unit registration.

Mandating registration of the underlying plotted area, where neither any allottee exists nor any sale activity is contemplated, would only impose an unnecessary compliance burden without serving any regulatory objective.

Conclusion and Prayer

In light of the above statutory interpretation, factual position, and consistent regulatory practice, it is respectfully submitted that:

- The additional plotted license (License No. 13 of 2024) does not independently require registration, as no residential plots are being marketed or sold. The promoter shall seek registration of the balance residential portion at an appropriate stage when the same is proposed for sale.
- The commercial block admeasuring 3.419 acres, duly sanctioned by DTCP, constitutes a distinct and saleable real estate project and is, therefore, the only portion requiring registration under the Act.
- Linking the registration of this commercial block with prior registration of the plotted colony has no statutory backing and is inconsistent with the Authority's past practice.
- Without prejudice, if the Authority still considers it necessary, the promoter is willing to register the overall licensed land along with the balance area, but such condition may not be made a precondition for processing this commercial registration.
- We, therefore, humbly request the Hon'ble Authority to kindly consider the above submission and permit direct registration of the distinct commercial component without insisting on separate registration of the plotted development, which is neither offered for sale nor subject to any allottee obligation.

In this regard it is submitted that, as per the records of the Authority,

- The registration no 56 of 2021 is for project namely "Summit Plaza" being developed by DLF Ltd. in Sector – 54, Gurugram. It is a commercial component project of residential plotted colony for an area admeasuring 2.65 acres. The part completion certificate of 66.25 acres of residential plotted colony has been obtained by promoter vide memo no. CC-71/JE(B)/2010/15926 dated 09.11.2010 and accordingly said registration has been done.
- The registration no 12 of 2022 is for project namely "Gardencity Arcade" being developed by DLF Utilities Ltd. in Sector – 92, Gurugram. It is a commercial component project of residential plotted colony for an area admeasuring 1.42 acres. The part completion certificate has been obtained by promoter vide memo no. LC-2523-IIJE(VA)/2014/14328 dated 02.07.2014 for an area admeasuring 101.218 acres and LC-2523H-PA(B)-2015/5603 dated 18.03.2016 for an area admeasuring 62.8435 acres accordingly said registration has been done.

On 03.11.2025, the matter has been adjourned to 24.11.2025.

	<p>The promoter has applied for registration of additional license no. i.e., 13 of 2024 dated 29.01.2024 valid up to 28.01.2029 for residential plotted colony having land measuring 4.8284 acres on 17.11.2025.</p> <p>On 24.11.2025, the matter has been adjourned to 15.12.2025.</p>
<p>30.</p>	<p>Present compliance status as on 15.12.2025 of deficit documents as observed during the last hearing dated 24.11.2025</p> <ol style="list-style-type: none"> 1. 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 need to be revised. 2. Online DPI needs to be corrected. Status – Submitted but need to be revised. 3. The application applied for registration of distinct commercial component (3.419 acres) falls under additional license no. i.e., 13 of 2024 dated 29.01.2024 valid up to 28.01.2029 for residential plotted colony having area admeasuring 4.8284 acres which is not yet registered with the Authority. Accordingly, the promoter needs to get the additional license registered with the Authority and thereafter distinct commercial component on the said license can be applied for registration. The same need to be clarified. Status – Promoter has submitted a representation in the Authority which is described above and the promoter has applied for registration of additional land measuring 4.8284 acres on 17.11.2025. 4. In Collaboration agreement, clause regarding irrevocability, need to be submitted and details of unit sharing between the landowner and promoter duly signed by both parties need to be submitted. Status – Supplementary collaboration agreement dated 15.10.2025 submitted which shows earlier collaboration agreement and this agreement is irrevocable. Further, promoter has done the revenue share with the landowner now. 5. Environmental Clearance need to be submitted. Status – Not Submitted and applied on 11.06.2024 6. Fire scheme approval need to be submitted. Status – Submitted 7. Mining permission need to be submitted. Status – Not submitted, and stated that after EC will apply for mining permission. 8. Electrical load availability connection needs to be submitted. Status – Submitted. 9. Mutation certified on latest dates need to be submitted. Status – Submitted. 10. The details of ongoing litigation in the past five years in relation to the real estate projects developed or being developed by the promoter in the State, if any, in accordance with Rule 14(1)(a)(iii) of the Haryana Real Estate (Regulation and Development) Rules,

	<p>2017 in the format provided under Annexure- C of the Rules, 2017 need to be submitted. Status – Submitted.</p> <p>11. Draft allottees documents i.e., application form, allotment letter, BBA, conveyance deed, payment receipt as per prescribed format needs to be revised and submitted. Status – Submitted.</p> <p>12. Cost of the land amounts to Rs 7937.90 lakhs needs to be clarified according to the area applied for the registration is 3.419 acres. Additionally, an affidavit with compliance of Sec 4(2)(I)(D) with the landowners needs to be submitted. Status – Submitted.</p> <p>13. Details of any other cost amounts to Rs 1000 lakhs and details of financial resources from equity amounts to Rs 2433.39 lakhs mentioned in DPI needs to be submitted. Status – Submitted.</p> <p>14. Original non-encumbrance certificate not below the rank of tehsildar dated 03.09.2025 needs to be submitted. Status – Submitted.</p> <p>15. Independent Auditors Report for the financial year 2024-2025 and audited financial statement for the financial year 2024-2025 and 2023-24 needs to be submitted. Status – Submitted.</p> <p>16. Following Original CA Certificate needs to be submitted: CA Certificate for details in REP-1 (A-H), CA Certificate of net worth of promoter and CA Certificate of expenditure incurred and to be incurred. Status – Submitted.</p> <p>17. NOC from lender needs to be submitted. Status – Submitted.</p> <p>18. REP II needs to be revised as details of loan on the project is missing. Status – Submitted.</p> <p>19. Bank Undertaking dated 01.09.2025, needs to be revised as project name is not match with DPI and employee id is also missing. Status – Submitted.</p> <p>20. Board resolution duly acknowledged for operation of bank account as per RERA Regulation 2016 needs to be submitted. Status – Submitted.</p> <p>21. Quarterly estimated expenditure and quarterly fund flow statement needs to be submitted. Schedule and Challan of EDC and IDC paid for the project needs to be submitted. Status – Submitted.</p>
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31.	Remarks	<ol style="list-style-type: none"> 1. The annexures in the online application are not uploaded as well as the correction needs to be done in the online (A-H) application. 2. Online DPI needs to be corrected. 3. The application applied for registration of distinct commercial component (3.419 acres) falls under additional license no. i.e., 13 of 2024 dated 29.01.2024 valid up to 28.01.2029 for residential plotted colony having area admeasuring 4.8284 acres which is not yet registered with the Authority. Accordingly, the promoter needs to get the additional license registered with the Authority and thereafter distinct commercial component on the said license can be applied for registration. The same need to be clarified. Status - The promoter has applied for registration of additional license no. i.e., 13 of 2024 dated 29.01.2024 valid up to 28.01.2029 for residential plotted colony having land measuring 4.8284 acres on 17.11.2025. 4. Environmental Clearance need to be submitted. 5. Mining permission needs to be submitted.
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Recommendations:

The application submitted by the promoter for registration of real estate project under section 4 of the Act of 2016 as per details given above is complete and all the requisite documents as required u/s 4 of Act of 2016 and Haryana Rules, 2017 have been submitted and found to be in order except correction in A to H, corrections in online DPI, Approved Environmental Clearance and Mining Permission mentioned above at S.No 31.

The promoter shall submit the BG/DD amounting to Rs. 25 lakhs as a security amount for submission of Approved Environmental Clearance within 6 months from the grant of registration and an affidavit to submit the mining permission before the start of construction work at site. It is recommended that the Authority may consider the grant of registration subject to the submission of above.

Ashish Dubey

Ashish Dubey
Chartered Accountant

Shashank Sharma

Shashank Sharma
Associate Engineer Executive

Day and Date of hearing	Monday and 15.12.2025
Proceeding recorded by	Ram Niwas

PROCEEDINGS OF THE DAY

Proceedings dated: 15.12.2025.

Sh. Shashank Sharma, Associate Engineer Executive and Sh. Ashish Dubey, Chartered Accountant briefed about the facts of the case.

Sh. Saurabh (AR), Ms. Pragya (AR) and Sh. Lakshmikant are present on behalf of the promoter.

The Authorized Representative of the promoter submits that they have applied in the Authority for registration of additional license no. i.e., 13 of 2024 dated 29.01.2024 valid up to 28.01.2029 for residential plotted colony having land measuring 4.8284 acres and the registration of the said licensed land has been approved by the Authority today itself. The AR present states that, Environmental Clearance and Mining Permission are under process and the said approvals have not yet been obtained as on date. Further, the AR of the promoter undertakes to obtain and submit:

- i. The Approved Environmental Clearance within 6 months from the date of grant of registration; and
- ii. Mining permission before the start of construction.



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Project - The Skylo Tower

Promoter - M/s St. Patricks Realty Pvt. Ltd.

Further, he undertakes to submit a Demand Draft amounting to Rs. 25 lakhs, as a security deposit for timely compliance with the above requirement at point (i). It is also expressly undertaken that in the event of failure to obtain and submit the aforesaid approval within the stipulated time frames, the said security amount shall be liable to be forfeited by the Authority.

The Authority has noted that promoter has applied for registration of additional license number i.e., 13 of 2024 dated 29.01.2024 valid up to 28.01.2029 for residential plotted colony having land measuring 4.8284 acres on 17.11.2025 in the Authority, which was unregistered land initially and after due compliance, said licensed land has been registered in the agenda of today's meeting itself i.e., 15.12.2025.

Further, the Authority has taken note of the submissions made by the Authorized Representative of the promoter regarding the non-availability of the aforesaid statutory approvals as on date. In view of the above, and in the interest of regulatory compliance, the Authority hereby directs that the promoter shall submit a Demand Draft amounting to Rs. 25,00,000/- (Rupees Twenty-Five Lakhs only), in favour of the Authority, as security amount for timely submission of approved Environmental Clearance within 6 months from the date of grant of registration.

In the event of non-submission of the above approval within the prescribed time frames, the said security amount shall stand forfeited by the Authority, and such failure may also attract additional regulatory action as permissible under the Act of 2016, rules and regulations made thereunder. Further, the promoter shall submit Mining permission before start of construction.

Approved as proposed subject to rectification of deficiencies mentioned above.

The Registration Certificate shall be issued after submission of remaining deficiencies mentioned above including correction in A-H form, Online DPI and submission of a DD of Rs. 25 lakhs for submission of Approved Environmental Clearance within the timeframe mentioned above.

(Arun Kumar)
Chairman, HARERA