

**Hearing brief for registration of Project u/s 4**

S.No	Particulars	Details		
1.	<b>Name of the project</b>	The Riviera at AIPL Lake City		
2.	<b>Name of the promoter</b>	M/s AIPL Bharat Infrastructure Pvt. Ltd.		
3.	<b>Brief of the promoter</b>	The promoter i.e, M/s AIPL Bharat Infrastructure Pvt. Ltd. have incorporated dated 24.08.2024 having registered office at AIPL Business Club, 5 <sup>th</sup> Floor, Golf Course Extension Road, Sector 62, Gurugram Haryana. The company having the director Mr. Gurdeep Singh, Mr. Daljeet Singh and Mr. Harinder Singh.		
4.	<b>Nature of the project</b>	Group Housing Colony		
5.	<b>Location of the project</b>	Sector-103, Gurugram		
6.	<b>Legal capacity to act as a promoter</b>	Collaborator		
7.	<b>Name of the license holder</b>	M/s Babbler Projects Pvt. Ltd. and M/s AIPL Bharat Infrastructure Pvt. Ltd.		
8.	<b>Status of project</b>	New		
9.	<b>Whether registration applied for whole</b>	One go		
	<b>Phase no.</b>	N/A		
10.	<b>Online application ID</b>	RERA-GRG-PROJ-2085-2025		
11.	<b>License no.</b>	62 of 2025 dated 01.05.2025		valid up to 30.04.2030
12.	<b>Total licensed area</b>	5.1375 acres	Area to be registered	5.1375 acres
13.	<b>Projected completion date</b>	OC- 31.03.2033 CC- 30.06.2033		
14.	<b>QPR Compliances (if applicable)</b>	N/A		
15.	<b>4(2)(l)(D) Compliances (if applicable)</b>	N/A		
16.	<b>4(2)(l)(C) Compliances (if applicable)</b>	N/A		
17.	<b>Status of change of bank account</b>	N/A		
18.	<b>Details of proceedings pending against the project</b>	N/A		
19.	<b>RC Conditions Compliances (if applicable)</b>	N/A		
20.	<b>Number of Towers</b>	Residential - 2 + EWS - 1		
21.	<b>Number of units</b>	Residential - 344 + EWS- 61 + Commercial - 7		
22.	<b>Total Project cost</b>	Rs 987.25 Crores		

23.	Project Expenditure So far	Rs 81.28 Crores		
24.	Estimates expenditure for completion so far	Rs 905.97 Crores		
25.	Statutory approvals either applied for or obtained prior to registration			
	S.No	Particulars	Date of approval	Validity upto
	i)	License Approval	62 of 2025 dated 01.05.2025	30.04.2030
	ii)	Zoning Plan Approval	DRG. NO. DG,TCP 11560 dated 17.10.2025	-
	iii)	Building plan Approval	ZP-2165/SD(RD)/2025/41935 dated 03.11.2025	02.11.2030
	iv)	Environmental Clearance	Applied on 09.06.2025	
	v)	Airport height clearance	PALM/NORTH/B/042825/167104 dated 29.05.2025	28.05.2033
	vi)	Fire scheme approval	Applied on 03.11.2025	-
	vii)	Service plan and estimate approval	Applied on 03.11.2025	
26.	Fee Details			
	Registration Fee	Resi- 65,277.611 * 3.15 * 10 = Rs 20,56,245/- Comm- 119.547 * 3.15 * 20 = Rs 7531/- <b>Total = Rs 20,63,776/-</b>		
	Processing Fee	65,397.158 * 10 = Rs 6,53,972/-		
	Late Fee	N/A		
	Total Fee	<b>Rs 27,17,748/-</b>		
27.	DD amount	Rs 6,20,863/- Rs 19,55,539/- Rs 1,41,346/-		
	DD no. and date	001984 dated 30.10.2025 001985 dated 30.10.2025 002001 dated 17.11.2025		
	Name of the bank issuing	HDFC Bank		
	Deficient amount	<b>NIL</b>		
28.	File Status	Date		
	File received on	03.11.2025		
	First notice Sent on	25.11.2025		
	First hearing on	01.12.2025		
29.	Case History:	The Promoter M/s AIPL Bharat Infrastructure Pvt. Ltd. who is a Collaborator applied for the registration of real estate Group Housing colony namely "The Riviera at AIPL Lake City" located at Sector- 103, Gurugram under section 4 of the Real Estate (Regulations and Development) Act, 2016 vide central receipt no. 101617 dated 03.11.2025 and RPIN- 983. The Temp I.D. of REP - I (Part A-H} is RERA -GRG-PROJ-2085-2025. The project area for registration is 5.1375 acres as that of the licensed area i.e., 5.1375 acres granted under License no - 62 of 2025 dated 01.05.2025 which is valid upto 30.04.2030.		

The application for registration of Group Housing colony was scrutinized and 1<sup>st</sup> deficiency notice vide notice no. HARERA/GGM/RPIN/983 dated 25.11.2025 was issued to the promoter with an opportunity of being heard on 01.12.2025.

The complaint have been received on 10.06.2025 and 08.08.2025 stating not to grant RERA registration to the project which has been forwarded to the promoter alongwith the deficiency notice.

The promoter has submitted the reply on 10.11.2025 wherein the promoter has requested to change the name of the project from "The Riviera at AIPL Lake City" to "Riviera at AIPL Lake City".

Further, the promoter has submitted a reply on 11.11.2025 which was scrutinized and wherein the copy of the public notice published in three newspapers i.e., Times of India (English), The Tribune (English) and Nav Bharat Times (Hindi) dated 11.11.2025 for objection till 27.11.2025.

The promoter has submitted the reply on 26.11.2025 which was scrutinized and the status of the documents is mentioned below:

The promoter submitted a reply with respect to the complaint wherein the promoter stated that AIPL Bharat Infrastructure Pvt. Ltd. and Babbler Projects Pvt. Ltd. obtained a license bearing no. 62 of 2025 dated 01.05.2025 for the development of residential group housing project admeasuring 5.1375 acres situated in sector 103, Gurugram.

During the pendency of the approval of the registration of the aforesaid mentioned project, certain representations and letter dated 31.01.2025, 10.06.2025 and 06.08.2025 were filed by M/s Glorii Education Technology Pvt. Ltd. before the Authority inter alia seeking intervention in the proceedings of registration and objecting to the registration of the project.

Thereafter, the promoter stated that the present intervention os maliciously motivated, absolutely frivolous and seems to be an effort by the competitors to delay/ derail the process of registration of the project in order to gain undue advantage and disturb the competitive market.

The facts and detailed response to various representations dated 10.06.2025 abd 08.08.2025 are mentioned below:

- i. That M/s Desert Moon Realtors Pvt. Ltd. and Education Technology Pvt. Ltd. were joint owners of the land comprised in Khewat No. 107, Khata No. 114, Mustil No. 40, Killa No. 16/1 (2-0), 16/2 (6-0) and Mustil No. 41, Killa No. 20 (8-0), Kitaa 3 total land admeasuring 16 Kanals 0 Marla, situated at village Daulatabad, Sub Tehsil Kadipur, District Gurugram.
- ii. That out of 16 Kanals 0 Marla land mentioned hereinabove, M/s Desert Moon Realtors Pvt. Ltd. had a share of 7 Kanals 15 Marlas. That M/s Desert Moon Realtors Pvt. Ltd. for getting its share of land partitioned and construct a separate Khewat, submitted an Application before the Hon'ble Court of Assistant Collector IIND Grade, Sub-Tehsil Kadipur, District Gurugram. That vide the Partition Application a request was also made that during the partition, the land falling in the share of M/s Desert Moon Realtors Pvt. Ltd. be adjoined with the share of other khewat of M/s Desert Moon Realtors Pvt. Ltd. so that one contiguous parcel of land can be formed for M/s Desert Moon Realtors Pvt. Ltd.

- iii. That the mode of partition was sanctioned on 28.06.2024, Naksha B was approved on 02.07.2024, Naksha Zim was issued on 02.08.2024, and Sanad Takseem was issued on 05.08.2024. The partition was implemented both on the spot and in the revenue records. Mutation No. 4078 was sanctioned on 30.08.2024 in favour of the M/s Desert Moon Realtors Pvt. Ltd., and subsequently the land was lawfully sold to Ms Babler Projects Pvt. Ltd., vide sale deed (Vasika No. 7476) and mutation No. 4084 was sanctioned accordingly. Rapat No. 1403 dated 12.08.2024 records the delivery of possession in favour of the Babler Projects Pvt Ltd, thus negating the M/s Glorii Education Technology Pvt. Ltd.'s claim that the proceedings were not implemented. That, Subsequent to Partition a portion of land admeasuring 0.968 acres was sold to M/s Babler Projects Pvt. Ltd. through registered sale deed vasika no. 7476 dated 30.08.2024.
- iv. That thereafter Education Technology Pvt. Ltd. had filed a Revision Petition against the Partition Order/S dated 28.06.2024 and Takseem. However, Revision Court vide its order dated 11.07.2025 upheld the Partition and dismissed the Revision Petition of Education Technology Pvt. Ltd.. A copy of the same is attached herewith
- v. That, M/s Babler Projects Pvt. Ltd., in collaboration with the Applicant-Promoter and the Applicant- Promoter, applied for the issuance of a License for developing a Group Housing Colony on the Licensed Land (23 Kanals and 9 Marla owned by Applicant-Promoter and 17 Kanal and 13 Marla owned by Babler Projects Pvt. Ltd.). During the pendency of the approval of the License, Education Technology Pvt. Ltd. raised similar frivolous objections in DTCP. License No. 62 of 2025 was issued on 01.05.2025.
- vi. Thereafter after obtaining the requisite approvals from the Competent Authorities, had submitted an application under the provisions of the Real Estate (Regulation and Development) Act, 2016 (hereinafter referred to as the "RERA Act, 2016") for registration of a real estate project, namely, "Riviera at AIPL Lake City" (hereinafter referred to as the "Project").
- vii. The applicant made an application before the RERA Regulation and Development) Act, 2016 dated 03.11.2025.
- viii. That after issuance of the License and during the process of registration, Education Technology Pvt. Ltd. also filed a Representation on 10.06.2025, on false and frivolous grounds, raising the same issues which were raised in the Revision Petition and requested the Ld. Authority not to grant any registration to Applicant-Promoter, with respect to License No. 62 of 2025. Furthermore, after the dismissal of the Revision Petition, Education Technology Pvt. Ltd. filed a CWP challenging the revision court's order dated 11.07.2025 bearing no. CWP No. 21373 of 2025 titled as "Glorii Education Technology Pvt. Ltd. vs Commissioner, Gurugram, Division, Gurugram, and Ors.". That in the said CWP, M/s Desert Moon Realtors Pvt. Ltd. and M/s Babler Projects Pvt. Ltd. were also made parties. That the Hon'ble High Court vide its Order dated 31.07.2025 directed the parties thereto to maintain status quo qua the land under partition (as existing on that day) till the next date of hearing i.e., 19.08.2025.
- ix. It is pertinent to note that the Hon'ble High Court neither granted any stay on the revision court order dated 11.07.2025 nor granted any stay with respect to the license or approval qua the project.
- x. However in the garb of intimating the Ld. Authority about the order dated 31.07.2025, Misinterpreting the above referred order Education Technology Pvt. Ltd. had filed a

Letter dated 06.08.2025 vide Dak Receipt No. 95952 on 08.08.2025, to intimate the Ld. Authority about the Order dated 31.07.2025 passed by the Hon'ble High Court, Education Technology Pvt. Ltd. requested the Ld. Authority not to issue or renew any approvals/ permissions/ NOC in relation to License No. 62 of 2025 or register the Project.

- xi. It is pertinent to mention herein that both the Representation dated 10.06.2025 and the Letter dated 08.08.2025 were filed by Education Technology Pvt. Ltd. with a *malafide* intention of hampering the development of the Project and in order to delay and derail the process of registration for its Competitive benefits.
- xii. It is reiterated herein that the Representation dated 10.06.2025 was filed by Education Technology Pvt. Ltd. on similar grounds that were taken in the Revision Petition. That the Revision Petition has already been dismissed, and the Partition/ Sanad Takseem was upheld by the Hon'ble Revisional Court. Therefore, it is safe to say that as on date the Representation date 10.06.2025 has become infructuous. Furthermore, *vide* Order dated 31.07.2025, the Hon'ble High Court has directed the parties to maintain the status quo as of that day. It is further submitted that the aforementioned CWP is filed by Education Technology Pvt. Ltd. against the Order of the Hon'ble Revisional Court wherein the Partition/Sanad Takseem was upheld by the Hon'ble Revisional Court.
- xiii. It is pertinent to bring it to the knowledge of the Ld. Authority that Education Technology Pvt. Ltd. in its Letter filed on 08.08.2025, is trying to mislead the Ld. Authority by stating that the Hon'ble High Court has directed the parties to maintain the status quo as existing on the said date with respect to License No. 62 of 2025. It is important to clarify herein that the said CWP was filed by Education Technology Pvt. Ltd. against the Order passed by the Hon'ble Revisional Court. That with a *malafide* intention of extracting unjust enrichment from the Applicant-Promoter, Education Technology Pvt. Ltd. has raised issues with respect to partition/sanand takseem only. That no issues were raised involving the License No. 62 of 2025, nor any reliefs are sought against License No. 62 of 2025.
- xiv. It is further pertinent to mention herein that as per the Order dated 31.07.2025, the status quo was to be maintained as existing on the said date. Since, the issues were only with respect to partition/sanad takseem, therefore, as per the directions of the Hon'ble High Court the Parties thereto, were obligated to maintain the status quo only with respect to partition of the land which was already approved by Assistant Collector, 2<sup>nd</sup> Grade, Kadipur and further upheld by the Hon'ble Revisional Court *vide* its Order dated 11.07.2025.
- xv. However, Education Technology Pvt. Ltd. using and misinterpreting the order of the Hon'ble High court filed the above referred representation before the Ld. Authority seeking intervention in the proceedings of registration and objecting to the registration of the project.
- xvi. It is further submitted herein that the Hon'ble High Court *vide* its Order dated 14.11.2025, has already mentioned that the Interim Order dated 31.07.2025 shall continue only with respect to the land under partition till the next date of hearing, i.e., 02.12.2025. Relevant extract of the order is reproduced herein below:

*"List on 02.12.2025.*

*To be taken up at 2.00 pm.*



Interim order dated 31.07.2025 shall continue in respect of land under partition, till next date of hearing."

A bare perusal of the aforementioned Order, it is evident that the Hon'ble High Court has directed the parties to the said CWP to maintain the status quo only with respect to land under partition, i.e., as per the sanad takseem. That said, Order nowhere mentions that there is any status quo on the License bearing No. 62 of 2025. That by misinterpreting and misrepresenting the Order of the Hon'ble High Court, Education Technology Pvt. Ltd. only wants to create hurdles in the registration proceedings of the Project.

- xvii. It is also pertinent to note that the Hon'ble High Court while considering the CWP No. 21373 of 2025 on 14.11.2025, post approval of the Zoning plans and Building plans, have reiterated their order for continuation of interim orders dated 31.07.2025 and stated that the said status quo pertains to "**status quo of the land under partition**".
- xviii. It is most respectfully submitted that:
  - (a) Such kind of issues of land are subject to the outcome of the proceedings before civil courts whereby Education Technology Pvt. Ltd. is already under litigation
  - (b) The issue is not a subject matter or in the jurisdiction of the Hon'ble Authority.
- xix. It is also pertinent to note that with respect to Section 4 of the RERA, it is the obligation of the promoter to disclose such litigations, which the applicant has duly made.
- xx. It is further pertinent to mention herein that in many other matters, the Ld. Authority has duly taken the said stand and have granted registration to the promoters subject to due disclosures.
- xxi. It is reiterated herein that in the present matter, there is no dispute with respect to the License and the Land, the only issue is with respect to Sanad Takseem, with respect to land under partition which is only less than one acre of the entire project and the same is pending before the Hon'ble High Court. The Hon'ble Court also did not pass any order with respect to License No. 62 of 2025, which itself signifies that the License has been obtained by following the due procedure of the law with respect to any such approvals thereof / registration thereof of the project.
- xxii. Thus, it is evident that the Representation dated 10.06.2025 and the Letter dated 08.08.2025 were filed by Education Technology Pvt. Ltd. with a malafide intention of hampering the registration of the Project in order to extract unjust enrichment from the Applicant-Promoter. Therefore, the same deserves to be dismissed for wasting the time and resources of the Ld. Authority. It is further reiterated that such kind of issues of land are subject to the outcome of the proceedings before civil courts.
- xxiii. It is reiterated that due disclosures of litigation, according to section of the RERA has duly made by the applicant. It is reiterated that DTCP while considering the license have sanctioned the zoning plans and building plans which have been done much subsequent to the orders of the Hon'ble High court which shows that there is no stay on the approvals qua the project.
- xxiv. It is most humbly submitted that the Applicant-Promoter/ applicant undertakes to abide by any such requirements / compliances as deem fit by this Hon'ble Authority while granting the registration of the Project.

**In view of the above, the promoter requested the Authority to dismiss the representation**

Email : hareragurugram@gmail.com, rera@gurugram@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, 2016की धारा 20के अंतर्गत गठित प्राधिकरण  
भारत की संसद द्वारा पारित 2016का अधिनियम संख्याक 16



	<p>dated 10.06.2025 and 08.08.2025, grant the registration of the project or pass any such other order(s)/ direction(s) in favor of the applicant promoter as may be deemed fit in view of the facts and circumstances.</p> <p>Further, the site of the project was visited on 28.11.2025 and it is noted that the site is presently accessible through 4 Karam revenue road and 6 Karam wide revenue road only.</p> <p>No objections have been received w.r.t public notice dated 11.11.2025.</p> <p><b>30. Present compliance status as on 01.12.2025 of deficient documents conveyed through notice dated 25.11.2025.</b></p> <p>1. Deficit fee of Rs 20,96,885/- needs to be submitted. Further, there are two permissible FAR shown on the approved site plan alongwith their residential and commercial bifurcation, the same needs to be clarified. The applicable fee may vary in view of clarification regarding area.  <b>Status:</b> DD vide no. 001985 dated 30.10.2025 amounting to Rs 19,55,539/- and DD vide no. 002001 dated 17.11.2025 amounting to Rs 1,41,346/-. Total amount - Rs 20,96,885/-. The promoter clarified that the total FAR (65475.122) is the area on 5.1375 acres is without commercial. It is just mentioned and not used in any calculation. However, as per policy, 0.5% is to be kept for commercial component. Therefore, there are two separate FAR's calculated on the site area. In the ratio 0.5% for commercial with base GAR of 1 and 0.15% of IGBC = 119.547 as permissible. Similarly, 99.5% for residential with base FAR 1.75, 0.15 of IGBC and 1.24925 of TDR = 65,277.611 as permissible.</p> <p>2. The complaints have been received on 10.06.2025 and 08.08.2025 stating not to grant RERA registration to the project. The copy of same is forwarded to you through email. Reply to the same needs to be submitted.  <b>Status: Submitted. Detailed above.</b></p> <p>3. The annexures in the online application are not uploaded as well as correction needs to be done in the online (A-H) application.  <b>Status: Not Submitted.</b></p> <p>4. Online DPI needs to be corrected.  <b>Status: Submitted but needs to be revised.</b></p> <p>5. 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, 2017 in the format provided under Annexure- C of the Rules, 2017 need to be submitted.  <b>Status: Submitted the details of litigation. CWP no 21373-2025.</b></p> <p>6. Approved Environment Clearance needs to be submitted. If applied then copy of the same needs to be submitted.  <b>Status: Applied on 09.06.2025, receipt attached.</b></p> <p>7. Fire Scheme approval needs to be submitted.  <b>Status: Applied on 03.11.2025, receipt attached.</b></p> <p>8. Approved Service plan and estimates needs to be submitted.  <b>Status: Applied on 03.11.2025, receipt attached.</b></p> <p>9. Approval NOC's from various agencies for connecting external services like road access permission needs to be submitted.</p>
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	<p><b>Status:</b> The promoter stated that the project is not situated on any Master road or Sector road and the access/entry to the project is from 6 Karam revenue rasta.</p> <p>10. Jamabandi duly certified by the revenue officer not below the rank of tehsildar six months prior to date of application needs to be submitted as the khasra numbers also not matching in the Jamabandi.</p> <p><b>Status: Submitted.</b></p> <p>11. Latest Land title search report alongwith annexure A &amp; B based on the latest jamabandi after incorporating bar enrolment number needs to be submitted.</p> <p><b>Status: Submitted.</b></p> <p>12. Draft Application form needs to be revised. Status: Submitted but needs to be revised.</p> <p>13. Draft Allotment letter needs to be revised Status: Submitted but needs to be revised.</p> <p>14. Draft Builder buyer agreement needs to be revised. Status: Submitted but needs to be revised.</p> <p>15. Draft Conveyance deed needs to be revised. Status: Submitted but needs to be revised.</p> <p>16. Mining permission needs to be submitted. <b>Status:</b> The promoter submitted an affidavit stating that they will submit the mining permission before the commencement of any construction work at the project site..</p> <p>17. Draft Brochure needs to be submitted. Status: Submitted but needs to be revised.</p> <p>18. Land cost needs to be clarified according to area apply for registration.</p> <p><b>Status: Submitted.</b></p> <p>19. Quarterly statement of expenditure and sources needs to be submitted. <b>Status: Submitted.</b></p> <p>20. Copy of paid challan of EDC and IDC needs to be submitted. <b>Status: Submitted.</b></p> <p>21. NOC from lender for creating a third party right needs to be submitted. <b>Status: Submitted.</b></p>
<b>31. Remarks</b>	<p>1. The complaints have been received on 10.06.2025 and 08.08.2025 stating not to grant RERA registration to the project. The copy of same is forwarded to you through email. Reply to the same needs to be submitted.</p> <p><b>Status: Submitted. Detailed above.</b></p> <p>2. The annexures in the online application are not uploaded as well as correction needs to be done in the online (A-H) application.</p> <p>3. Online DPI needs to be corrected.</p> <p>4. 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, 2017 in the format provided under Annexure- C of the Rules, 2017 need to be submitted.</p>

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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 Environment Clearance, Approved Fire Scheme, Approved Service plan and Estimates, Mining Permission and the documents mentioned above.

The promoter shall submit the BG/DD amounting to Rs. 25 lakhs as a security amount for submission of Approved Environment Clearance, Approved Fire Scheme, Approved Service plan and Estimates within 4 months from the grant of registration.

It is recommended that the Authority may consider the grant of registration subject to the submission of above.

*Asha 11/12/25*  
Asha

Chartered Accountant

*Ashish 01/12/25*  
Ashish Kush

Planning Executive

Day and Date of hearing	Monday and 01.12.2025
Proceeding recorded by	Ram Niwas

**PROCEEDINGS OF THE DAY**

Proceedings dated: 01.12.2025

Sh. Ashish Kush, Planning Executive and Ms. Asha, Chartered Accountant briefed about the facts of the case.

Sh. Vijay Singh (AR), Ms. Julie Jha(AR), Ms. Sonam Sharma, Sh. Venket Rao (Advocate) and Sh. Gunjan Kumar (Advocate) are present on behalf of the promoter.

Sh. Dhruv Dutt Sharma (Advocate), Sh. Sayantan, Ms. Divya and Sh. Rohit are present on behalf of the complainant i.e., M/s Glorii Education Technology Pvt. Ltd.

The advocate on behalf of the complainant stated that the complainant was co-sharer in the land under partition which is challenged in Hon'ble High Court vide CWP No. 21373 of 2025. The next date of hearing in the matter is fixed for 02.12.2025. Further, stated that till the partition proceedings are not finalized the registration of the project may not be granted.

The AR of the promoter states that:

- i. Out of 16 Kanals 0 Marla land mentioned hereinabove, M/s Desert Moon Realtors Pvt. Ltd. had a share of 7 Kanals 15 Marlas. That M/s Desert Moon Realtors Pvt. Ltd. for getting its share of land partitioned and construct a separate Khewat, submitted an Application before the Hon'ble Court of Assistant Collector IIND Grade, Sub-Tehsil Kadipur, District Gurugram. That vide the Partition Application a request was also made that during the partition, the land falling in the share of M/s Desert Moon Realtors Pvt. Ltd. be adjoined with the share of other khewat of M/s Desert Moon Realtors Pvt. Ltd. so that one contiguous parcel of land can be formed for M/s Desert Moon Realtors Pvt. Ltd.
- ii. The mode of partition was sanctioned on 28.06.2024, Naksha B was approved on 02.07.2024, Naksha Zim was issued on 02.08.2024, and Sanad Takseem was issued on 05.08.2024. The partition was implemented both on the spot and in the revenue records. Mutation No. 4078 was sanctioned on 30.08.2024 in favour of the M/s Desert Moon Realtors Pvt. Ltd.
- iii. That, subsequent to partition, a portion of land ~~admeasuring~~ 0.968 acres was sold to M/s Babler Projects Pvt. Ltd. through registered sale deed vasika no. 7476 dated 30.08.2024 and mutation No. 4084 was sanctioned accordingly. Rapat No. 1403 dated 12.08.2024 records the delivery of possession in favour of M/s Babler Projects Pvt. Ltd, thus negating M/s Glorii Education Technology Pvt. Ltd.'s claim that the proceedings were not implemented.
- iv. Thereafter M/s Glorii Education Technology Pvt. Ltd had filed a Revision Petition against the Partition Order dated 28.06.2024 and Takseem. However, Revision Court vide its order dated 11.07.2025 upheld the Partition and dismissed the Revision Petition of M/s Glorii Education Technology Pvt. Ltd.
- v. During the pendency of the approval of the License, M/s Glorii Education Technology Pvt. Ltd. raised similar frivolous objections before the DTCP. License No. 62 of 2025 was issued on 01.05.2025.
- vi. It is also pertinent to note that the Hon'ble High Court while considering the CWP No. 21373 of 2025 on 14.11.2025, post approval of the Zoning plans and Building plans, have reiterated their order for continuation of interim orders dated 31.07.2025 and stated that the said status quo pertains to "status quo of the land under partition".

The Authority has considered the submissions made by both parties and examined the records placed before it. At the outset, it is noted that the role of the Authority under the Real Estate (Regulation and Development) Act, 2016 ("the Act") is that of a *regulator*, and its jurisdiction at the stage of registration of a real estate project is confined to verifying whether the application submitted under Section 4 of the Act read with Rule 3 of the Haryana Real Estate (Regulation and Development) Rules, 2017 ("the Rules, 2017"), is complete in all respects and supported by true, correct, and complete disclosures. Under the statutory framework, the Authority is obligated to decide a registration application within 30 days of its filing.

In terms of Section 4(2)(l)(A) and (B) of the Act, a promoter seeking project registration must submit a declaration supported by affidavit confirming:

- (i) the legal title to the land, along with legally valid documents; and
- (ii) that the land is free from all encumbrances, or alternatively, complete details of *all* encumbrances or claims of any kind—including any rights, title, interest, disputes, or claims of any party—in or over the project land.

Rule 3(1)(e) of the Rules, 2017 further obligates promoters to disclose “all dues, litigation, rights, title, interest and name of any party in or over such land” along with a non-encumbrance certificate issued by the competent revenue authority. Rule 14(1)(e)(ii)(D) mandates that these very disclosures be published on the Authority’s website for public scrutiny.

These statutory provisions clearly establish that complete disclosure of litigation or claims affecting the project land is not only permissible but mandatory, and the Authority must ensure truthful, complete, and transparent disclosures by promoters before granting registration. Sections 34 and 37 further require the Authority to secure compliance by promoters and to issue such directions as may be necessary for the proper discharge of its regulatory functions.

The Authority notes that the license for the present project was granted by DTCP on **01.05.2025**. The **Zoning Plan** and **Building Plans** were subsequently approved on **17.10.2025** and **03.11.2025**, respectively. The pendency of CWP No. 21373 of 2025 before the Hon’ble High Court pertains to proceedings relating to partition of land, in which the Hon’ble High Court has continued the interim order of status quo regarding “the land under partition.”

Given the statutory scheme as discussed above, the Authority is not empowered to adjudicate on the validity of the partition proceedings or the title claimed by any of the contesting parties. However, the pendency of litigation affecting rights in the project land is a *material fact* that the promoter is statutorily bound to disclose, and the Authority is duty-bound to ensure that such disclosure is made available to the public at large.

Accordingly, keeping in view the nature of the ongoing litigation and in discharge of its obligations under Sections 34 and 37 of the Act, the Authority directs that **a specific condition shall be incorporated in the Registration Certificate** to the following effect:

**“The promoter shall make full, complete, and prominent disclosure of the litigation pending before the Hon’ble High Court in CWP No. 21373 of 2025, or any other proceedings affecting rights in the project land, in all brochures, advertisements, marketing or promotional materials, and on the promoter’s website with respect to the project. The promoter shall also ensure that the said disclosure forms an integral part of every agreement for sale executed with allottees.”**

This condition is mandated to ensure transparency, to safeguard the interests of allottees, and to fulfil the statutory duty of the Authority to ensure truthful disclosures under the Act and the Rules, 2017.

For abundant clarity, the Authority further directs that the promoter shall strictly comply with all orders passed by the Hon’ble High Court in CWP No. 21373 of 2025, including any interim or subsequent directions issued from time to time. The grant of registration by the Authority shall not, in any manner, dilute, override, or affect the binding nature of the orders of the Hon’ble High Court, and the promoter shall ensure full adherence to the same at all stages of the project.



The AR of the promoter has submitted an application requesting for change of name of project from "The Riviera at AIPL Lake City" to "Riviera at AIPL Lake City". The AR of the promoter further states that they are in process of seeking approval from DHBVN to lay the 11 KV line running on 4 Karam revenue road underground, and the same is subject to approval from DHBVN. He also states that the site is accessible from 4 Karam wide revenue road and 6 Karam wide revenue road which are existing.

The Authorized Representative of the promoter submits that presently, Environment Clearance, Fire Scheme Approval, Approved service plans and estimates 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, Fire Scheme Approval and Approved Service Plans and Estimates within 4 months from the date of grant of registration.
- ii. Mining permission before the start of construction.

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

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 three separate Demand Drafts / Bank Guarantees, each amounting to Rs. 25,00,000/- (Rupees Twenty-Five Lakhs only), in favour of the Authority, as security amounts for timely submission of the following approvals:

- a. Approved Environmental Clearance: within 4 months from the date of grant of registration;
- b. Fire Scheme Approval: within 4 months from the date of grant of registration; and
- c. Approved Service Plans and Estimates: within 4 months from the date of grant of registration.

In the event of non-submission of any of the above approvals within the prescribed time frames, the corresponding 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 the Mining permission before start of construction. Also, the promoter shall prominently disclose in all advertisements, brochures, marketing materials, and promotional content that the site presently has access only through 4 karam revenue road and 6 karam revenue road alongwith full particulars of the pending litigation as directed above.

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 three BG/DD of Rs. 25 lakhs each for submission of Approved Environment Clearance, Fire Scheme approval and approved Service plan and Estimates within the timeframe mentioned above.

(Arun Kumar)  
Chairman, HARERA