



New PWD Rest House, Civil Lines, Gurugram, Haryana

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

Project - Landmark One
RERA-GRG-2117-2025

Hearing brief for registration of Project u/s 4

S.No	Particulars	Details	
1.	Name of the project	Landmark One	
2.	Name of the promoter	M/s Landmark Apartments Pvt. Ltd.	
3.	Brief of the promoter	M/s Landmark Apartments Pvt. Ltd. is an active, unlisted private company incorporated on June 23, 2006, with its registered office in New Delhi. The company has an authorized share capital of ₹25.00 crore and an equal paid-up capital of ₹25.00 crore. Led by directors Sandeep Chhillar and Dinesh Kumar, it specializes in real estate development, primarily across Gurugram and the NCR. Its diverse portfolio includes major residential and commercial landmarks such as Landmark Cyber Park, Landmark Avana, and Landmark Golden Heights.	
4.	Nature of the project	IT Park Colony	
5.	Nature of the phase	IT Park Colony	
6.	Location of the project	Sector- 67, Gurugram	
7.	Legal capacity to act as a promoter	License Holder	
8.	Name of the license holder	M/s Landmark Apartments Pvt. Ltd.	
9.	Status of project	New	
10.	Whether registration applied for whole	Phase	
	Phase no.	2	
11.	Online application ID	RERA-GRG-PROJ-2117-2025	
12.	License no.	97 of 2008 dated 12.05.2008.	valid up to 11.05.2026
13.	Total licensed area	8.3125 acres	Area to be registered 4.4370 acres
14.	Projected completion date	OC - 31.05.2033 CC - 31.05.2039	
15.	QPR Compliances (if applicable)	N/A	
16.	4(2)(I)(D) Compliances (if applicable)	N/A	
17.	4(2)(I)(C) Compliances (if applicable)	N/A	
18.	Status of change of bank account	N/A	



19.	Details of proceedings pending against the project	N/A		
20.	RC Compliances (if applicable) Conditions (if applicable)	N/A		
21.	Number of Towers	1		
22.	Number of Units	63 units (Shops - 19 + Office - 44)		
23.	Total Project cost	Rs 656.67/- crores		
24.	Project Expenditure So far	Rs 38.51/- crores		
25.	Estimates expenditure for completion so far	Rs 618.16/- crores		
26.	Statutory approvals either applied for or obtained prior to registration			
	S.No	Particulars	Date of approval	Validity upto
	i)	License Approval	97 of 2008 dated 12.05.2008.	11.05.2026
	ii)	Zoning Plan Approval	ZP-453/PA(DK)/2025/35563 dated 09.09.2025	
	iii)	Building plan Approval	ZP-453/PA(DK)/2025/45156 dated 27.11.2025	26.11.2030
	iv)	Environmental Clearance	Not Submitted	
	v)	Airport height clearance	AAI/RHQ/NR/ATM/NOC/2025/1370/4515-18 dated 07.11.2025	06.11.2033
	vi)	Fire scheme approval	Not Submitted.	
	vii)	Service plan and estimate approval	Not Submitted.	
27.	Fee Details			
	Registration Fee	Resi- N/A Comm - 52,446.387 * 2.54 * 20 = Rs 26,64,276/- Total = Rs 26,64,276/-		
	Processing Fee	52,446.387 * 10 = Rs 5,24,464/-		
	Late Fee	The total Permissible FAR as per original building plan is 82,506.628 sq:n. The promoter has registered the FAR of 30034.67 sqm in 2019. The balance FAR to be registered comes out to be 52,471.958 sqm. Now, registration fee has been calculated on balance FAR on which late fee to be imposed. Calculation of registration fee is mentioned below. 52,471.958 * 2.46 * 20 = Rs 25,81,620/-.		

		The late fee has been calculated on the balance FAR which is approved in original building plan but not registered by the promoter. i.e., (750% of registration fee of balance FAR) 25,81,620 * 7.5 = Rs 1,93,62,150/-
	Total Fee	Rs 2,25,50,890/-
28.	DD/RTGS amount	Rs 1,00,000/- Rs 26,64,276/- Rs 4,24,464/-
	DD/RTGS no. and date	494261 dated 28.11.2025. 178107 dated 24.12.2025. 494338 dated 24.12.2025.
	Name of the bank issuing	Karnataka Bank Limited
	Deficient amount	Rs 1,93,62,150/-
29.	File Status	Date
	File received on	01.12.2025
	Additional documents received on	11.12.2025
	First notice Sent on	23.12.2025
	First hearing on	29.12.2025
30.	Case History:	<p>The promoter i.e., M/s Landmark Apartments Pvt. Ltd. has applied for the registration of Phase 2 of IT Park colony namely "Landmark One" located at sector 67, Gurugram under Section 4 of the Real Estate (Regulations and Development) Act, 2016 vide central receipt no. 103277 dated 01.12.2025 and RPIN- 996. The Temp I.D. of REP - I (Part A-H) is RERA -GRG-PROJ-2117-2025.</p> <p>The license no. 97 of 2008 dated 12.05.2008 has been granted for the development of the IT Park colony having total area admeasuring 8.3125 acres.</p> <p>The promoter has got the project registered vide registration no. 61 of 2019 dated 25.11.2019 with the Authority having an area admeasuring 4.48125 acres as Phase-I.</p> <p>Now, the DTCP Haryana has approved the phasing plan vide no. ZP-453/PA(DK)/2025/35563 dated 09.09.2025.</p> <p>Now, the area of Phase I changed from 4.48125 acres to 3.01699 acres as per phasing plan.</p> <p>The project is to be developed in 3 phases.</p> <p>Phase 1 - 3.01699 acres (Reduced from 4.48125 acres to 3.01699 acres - OC obtained on 26.12.2018 for 30,034.67 sqm FAR)</p> <p>Phase 2 - 4.43702 acres</p> <p>Phase 3 - 0.83374 acres</p> <p>The Building plans of the applied area has been approved vide memo No. ZP-453/PA(DK)/2025/45156 dated 27.11.2025.</p> <p>The promoter has submitted the sold inventory of phase 1. As per promoter there are 222 allottees out of which consent of 189 allottees has been submitted.</p>



	<p>Further, there are 163 unique allottees out of which promoter has submitted the consent of 141 unique allottees.</p> <p>The application for registration of Phase 2 of IT Park Colony was scrutinized and 1st deficiency notice vide notice no. HARERA/GGM/RPIN/996 dated 13.12.2025 was issued to the promoter with an opportunity of being heard on 29.12.2025.</p> <p>The promoter has submitted the reply on 09.12.2025 wherein the copy of the public notice published in three newspapers i.e., The Tribune (English), The Hindu (English) and Dainik Tribune (Hindi) dated 08.12.2025 for objection till 21.12.2025 has been submitted.</p> <p>Further, the promoter has submitted another reply on 15.12.2025 wherein the copy of public notice published in three newspapers i.e., The Tribune (English), Hindustan Times (English) and Hindustan (Hindi) dated 13.12.2025 for objection till 26.12.2025 w.r.t the two-third consents of existing allottees submitted by the promoter.</p> <p>Further, the site of the project was visited on 24.12.2025 and it is noted that the site is presently accessible through service road only.</p> <p>The promoter has submitted a reply on 24.12.2025 which was scrutinized and and the status of documents is mentioned below.</p>		
<p>31.</p>	<table border="1"> <tr> <td data-bbox="272 981 598 1998"> <p>Present compliance status as on 29.12.2025 of deficient documents conveyed vide notice dated 23.12.2025.</p> </td> <td data-bbox="598 981 1386 1998"> <ol style="list-style-type: none"> 1. Deficit fee Rs 2,24,50,890/- needs to be submitted. Status: Submitted DD vide no 178107 dated 24.12.2025 amounting to Rs 26,64,276/- and DD vide no 494338 dated 24.12.2025 amounting to Rs 4,24,464/-. Deficit fee - Rs 1,93,62,150/- needs to be submitted. 2. The annexures in the online application are not uploaded as well as correction needs to be done in the online (A-H) application. Status: Not Submitted. 3. Online DPI needs to be corrected. Status: Not Submitted. 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. Status: Submitted the details of litigation in Annexure C. 5. Comparison sheet regarding the revision in the layout plan needs to be submitted. Status: Submitted. 6. Environment Clearance needs to be submitted. If applied, than copy of same needs to be submitted. </td> </tr> </table>	<p>Present compliance status as on 29.12.2025 of deficient documents conveyed vide notice dated 23.12.2025.</p>	<ol style="list-style-type: none"> 1. Deficit fee Rs 2,24,50,890/- needs to be submitted. Status: Submitted DD vide no 178107 dated 24.12.2025 amounting to Rs 26,64,276/- and DD vide no 494338 dated 24.12.2025 amounting to Rs 4,24,464/-. Deficit fee - Rs 1,93,62,150/- needs to be submitted. 2. The annexures in the online application are not uploaded as well as correction needs to be done in the online (A-H) application. Status: Not Submitted. 3. Online DPI needs to be corrected. Status: Not Submitted. 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. Status: Submitted the details of litigation in Annexure C. 5. Comparison sheet regarding the revision in the layout plan needs to be submitted. Status: Submitted. 6. Environment Clearance needs to be submitted. If applied, than copy of same needs to be submitted.
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		<p>28. Quarterly estimated expenditure, quarterly source of funds and quarterly net cash flow statement needs to be submitted. Status: Submitted.</p> <p>29. Schedule and Challan of EDC and IDC paid for the project needs to be submitted. Undertaking regarding auto credit of 10% of receipts from separate RERA account maintained under section 4(2)(I)(D) needs to be submitted. Status: Submitted. The promoter stated that all the dues of EDC and IDC have been fully paid accordingly, undertaking regarding auto credit of 10% of receipts from separate RERA account maintained under section 4(2)(I)(D) is not required.</p>
32.	Remarks	<p>1. Deficit fee Rs 2,24,50,890/- needs to be submitted. Status: Submitted DD vide no 178107 dated 24.12.2025 amounting to Rs 26,64,276/- and DD vide no 494338 dated 24.12.2025 amounting to Rs 4,24,464/-. Deficit fee – Rs 1,93,62,150/- needs to be submitted.</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. Environment Clearance needs to be submitted. If applied, than copy of same needs to be submitted. Status: Submitted. Revised EC needs to be submitted.</p> <p>5. Fire Scheme approval needs to be submitted. If applied, than copy of same needs to be submitted. Status: Submitted. Revised Fire Scheme Approval needs to be submitted.</p> <p>6. Approved Service plan and estimates needs to be submitted. If applied, than copy of same needs to be submitted. Status: Submitted. Revised Service plan and estimates approval needs to be submitted.</p> <p>7. Approval NOC's from various agencies for connecting external services like sewerage, storm water and road access permission needs to be submitted. Status: Sewerage and Storm water submitted. Further, the promoter stated that a revenue road of 6 karam is passing adjacent to project site which provides direct access, hence road access is not required.</p> <p>8. Draft Application form needs to be revised.</p>



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Ashish Dubey
29/12/25

Ashish Dubey
Chartered Accountant

Ashish Kush
29/12/25

Ashish Kush
Planning Executive

Day and Date of hearing

Monday and 29.12.2025

Proceeding recorded by

Ram Niwas

PROCEEDINGS OF THE DAY

Proceedings dated: 29.12.2025

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

Sh. Abhishek Kanodia, Sh. Narinder Singh Dalal, Sh. Rajesh Grewal and Sh. Vankat Rao (Advocate) are present on behalf of the promoter.

The AR of the promoter states that the promoter has not advertised, sold, booked any unit in Phase 2 which is applied for registration. Further, the phasing plan has been approved vide no. ZP-453/PA(DK)/2025/35563 dated 09.09.2025 and building plans of phase 2 has been approved vide no. ZP-453/PA(DK)/2025/45156 dated 27.11.2025. The AR requests for waiving the late fee.

The Authority has carefully examined the submissions and the record available on file.

The Authority observes that that the license for development of the project was issued in the year 2008, much prior to the commencement of the Real Estate (Regulation and Development) Act, 2016 (hereinafter referred to as "the Act of 2016"), which came into force on 01.05.2017. It is further evident from the record that the building plans for the entire project were approved vide memo no. ZP-453/JD(BS)/2011/896 dated 24.02.2011, thereby granting the promoter all requisite statutory approvals to commence development activities well before the enforcement of the Act of 2016.

In view of the above, the Authority is of the considered opinion that the project had crossed the stage of mere proposal and had obtained all necessary permissions to start construction prior to 01.05.2017. Consequently, on the date of commencement of the Act of 2016, the project squarely fell within the category of an "ongoing project" for which the completion certificate had not been issued.



Section 3(1) of the Act of 2016 mandates that no promoter shall advertise, market, book, sell, or offer for sale any unit in a real estate project without registering the project with the Authority. The first proviso to Section 3(1) specifically requires that all ongoing projects, for which completion certificate has not been issued as on 01.05.2017, shall be registered with the Authority within three months from the date of commencement of the Act. Section 3(1) of the Act of 2016 is reproduced hereunder for ready reference:

“3. Prior registration of real estate project with 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:

Provided further that if the Authority thinks necessary, in the interest of allottees, for projects which are developed beyond the planning area but with the requisite permission of the local authority, it may, by order, direct the promoter of such project to register with the Authority, and the provisions of this Act or the rules and regulations made thereunder, shall apply to such projects from that stage of registration.”

Further, Rule 2(1)(o) of the Haryana Real Estate (Regulation and Development) Rules, 2017 (hereinafter referred to as ‘the Rules, 2017’) defines an “ongoing project” as a project for which a license was issued on or before 01.05.2017 and where development works were yet to be completed on that date, subject to limited exclusions. Rule 2 (1)(o) is reproduced hereunder for ready reference:

“on going project” means a project for which a license was issued for the development under the Haryana Development and Regulation of Urban Area Act, 1975 on or before the 1st May, 2017 and where development works were yet to be completed on the said date, but does not include:

(i) any project for which after completion of development works, an application under Rule 16 of the Haryana Development and Regulation of Urban Area Rules, 1976 or under sub code 4.10 of the Haryana Building Code 2017, as the case may be, is made to the Competent Authority on or before publication of these rules and

(ii) that part of any project for which part completion/completion, occupation certificate or part thereof has been granted on or before publication of these rules.

The present project does not fall under any of the exclusions provided under clauses (i) or (ii) of Rule 2(1)(o), as neither a completion certificate nor part completion certificate for the entire licensed area had been issued prior to the publication of the Rules. Accordingly, the project comes under the definition of “ongoing projects” as per rule 2(1)(o) of Rules 2017.

It is also pertinent to note that a part of the licensed area, namely “Cyber Park Phase-1,” has already been registered with the Authority in the year 2019, thereby acknowledging the applicability of the Act of 2016 to the licensed project. The remaining portion of the licensed area (Phase-2) forms an integral and inseparable part of the same license and, therefore, was equally liable to be registered as an ongoing project under the Act.

The plea of the promoter that Phase-2 was neither marketed nor sold prior to registration is legally untenable. The obligation to register an ongoing project under Section 3(1) of the Act of 2016 does not depend upon actual sale, booking, or advertisement, but arises from the existence of an ongoing project for which statutory approvals to develop had already been granted and development remained incomplete as on 01.05.2017. Registration under the Act is mandatory and automatic by operation of law, and cannot be deferred at the discretion of the promoter based on internal phasing or future commercial intent.

Accordingly, the delay in applying for registration of Phase-2 constitutes a clear violation of proviso to Section 3(1) of the Act of 2016 read with Rule 2(1)(o) of the Rules, 2017. Therefore, late fee is leviable in accordance with Regulation No. 22 of the RERA Gurugram Regulations, 2021 dated 21.08.2021, which prescribes the imposition of late fee for delayed registration of projects.

In view of the foregoing facts and settled legal position, the request of the promoter for waiver of late fee is hereby rejected. The Authority finds no justifiable or exceptional circumstances warranting exercise of discretion for waiver, particularly when the promoter had obtained building plan approvals as early as 2011 and remained under a statutory obligation to register the ongoing project within the prescribed time.

Accordingly, the promoter is directed to deposit the late fee amounting to ₹1,93,62,150/- (Rupees One Crore Ninety-Three Lakh Sixty-Two Thousand One Hundred Fifty only) along with submission of all other pending/deficit documents, failing which the application for registration shall be liable to be rejected without further notice.

Upon request of the Authorized Representative, one week's time is granted to comply with the above directions.

The matter is adjourned to 05.01.2026 for compliance.



(Arun Kumar)
Chairman, HARERA