

New PWD Rest House, Civil Lines, Gurugram, Haryana

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

Project - The Marq
Promoter - M/s Adani M2K Realtors LLP
Hearing brief for registration of Project u/s 4

S.No	Particulars	Details		
1.	Name of the project	The Marq.		
2.	Name of the promoter	M/s Adani M2K Realtors LLP		
3.	Brief of the promoter	The promoter i.e., M/s Adani M2K Realtors LLP has been incorporated dated 21/11/2023 at Adani Corporate House, Shantigram, S G Highway, Khodiyar, Gandhi Nagar, Gujarat, India, 382421. Mr. Vipin Jain and Mr. Ranjeev Mahindru are the partners of the promoter.		
4.	Nature of the project	Group Housing Colony		
5.	Location of the project	Sector -102, Gurugram.		
6.	Legal capacity to act as a promoter	Collaborator		
7.	Name of the license holder	M/s Radhey Buildhome Pvt. Ltd.		
8.	Name of the collaborator (if any)	1. M/s Adani M2K Projects LLP (For License no 24 of 2012). 2. M/s Adani M2K Realtors LLP (for license no 131 of 2025 dated 29.07.2025)		
9.	Name of the COD/BIP Holder (if any)	M/s Adani M2K Realtors LLP (For License no 24 of 2012 as per order no. LC-2388/JE(AK)/2024/37494-99 dated 02.12.2024)		
10.	Status of project	New		
11.	Whether registration applied for whole	Whole Phases.		
	Phase no. applied	2 (1 & 2)		
	Nature of phase	Group Housing Colony		
12.	Online application ID	RERA-GRG-PROJ - 2140 -2025		
13.	License no.	1. 24 of 2012 dated 27.03.2012 renewed up to 26.03.2030 (5.13125 acres).		
		2. 131 of 2025 dated 29.07.2025 valid up to 28.07.2030(03125 acres)		
14.	Total licensed area	5.16125 acres.	Area to be registered	5.16125 acres.
15.	Projected completion date	31.12.2031		
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 1197.67.Cr.		
23.	Project expenditure so far	Rs.94.25 Cr.		

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 अर्तगत गठित प्राधिकरण
 भारत की संसद द्वारा पारित 2016 का अधिनियम संख्यांक 16

24.	Estimated expenditure for completion so far	Rs. 1103.42 Cr.
25.	Total no of towers	2 i.e., A (G+46), B(G+46).
26.	Total no of units	368 units and 668 parking.
27.	Statutory approvals either applied for or obtained prior to registration	
	S.No	Particulars
		Date of approval
		Validity up to
	i)	License Approval
		24 of 2012 dated 27.03.2012 131 of 2025 dated 29.07.2025
		26.03.2030 28.07.2030
	ii)	Zoning Plan Approval
		Drg. DTCP 11302 dated 30.07.2025
	iii)	Building plan Approval
		ZP-796/SD(RD)/2026/2462 dated 20.01.2026
		19.01.2031
	iv)	Environmental Clearance
		Not Submitted
	v)	Airport height clearance
		PALM/NORTH/B/120624/1400 145 dated 26.12.2024
		25.12.2032
	vi)	Fire scheme approval
		Not Submitted.
	vii)	Service plan and estimate approval
		Not Submitted.
28.	Fee Details	
	Registration fee	Residential 63,422.89 x 3.12 x 10 = Rs. 19,78,794/- Commercial 101.804 x 3.12 x 20 = Rs. 6,353/- Total - 19,78,794 + 6,353 = Rs. 19,85,147/-
	Processing fee	63,524.689 x 10 =Rs 6,35,247/-
	Late fee	N/A
	Note regarding late fee -	
	1. As per the opinion taken from Ld. AG, Haryana in respect of Group Housing Colony namely "GH 63" located at Sector-63, Gurugram. regarding the ongoing project and applicability of late fee wherein it is mentioned that it is not possible to say that as on 01.05.2017, promoter was in a position to start development of project because the building plans were not prepared. Equally speaking, even without requisite permissions as provided in section 4(2) of Act of 2016, the authority was not in a position to grant registration.	
	2. Here, the license has been approved in 2012 i.e., 24 of 2012 dated 27.03.2012 but, the building plans of the said project has been approved by DTCP vide memo no ZP-796/SD(RD)/2026/2462 dated 20.01.2026 as per the record available in the file submitted for registration.	
	3. Therefore, late fee has not been calculated and levied in this case.	
	Further, regarding deposit of late fees (as the license of the project i.e., 24 of 2012 dated 27.03.2012 is prior to RERA Act, 2016), the matter will be discussed in the project hearing and the same shall be payable as per the decision taken in this regard by the Hon'ble Authority.	
	Total	= 19,85,147 + 6,35,247 = Rs. 26,20,394/-

	DD amount	Rs. 26,20,500/-
	DD no. and date	500793 dated 08.01.2026
	Name of the bank issuing	ICICI Bank
	Deficient amount	26,20,394 - 26,20,500 = Rs. -106/- (NIL)
29.	File Status	Date
	File received on	21.01.2026
	Deficiency Notice	10.02.2026
	Documents Submitted on	11.02.2026
	First hearing on	16.02.2026
	Documents Submitted on	16.02.2026
	Second hearing on	18.02.2026
30.	Case History:	
	<p>The Promoter M/s Adani M2K Realtors LLP who is a Collaborator applied for the registration of real estate project Group Housing Colony namely "The Marq" located at Sector -102, Gurugram under section 4 of the Real Estate (Regulations and Development) Act, 2016 dated 21.01.2026 and RPIN-1019. The Temp I.D. of REP - I (Part A-H) is RERA -GRG-PROJ-2140-2025. The project area for registration is 2.70 Acres.</p> <p>The application for registration of e Group Housing Colony (was scrutinized and 1st deficiency notice vide notice no. HARERA/GGM/RPIN/1019 dated 10.02.2026 was issued to the promoter with an opportunity of being heard on 16.02.2026.</p> <p>Brief facts of the project are :-</p> <ol style="list-style-type: none"> 1. The license no 24 of 2012 dated 27.03.2012 renewed up to 26.03.2030 has been issued in favour of M/s Radhey Buildhome Pvt. Ltd. for an area admeasuring 17.9875 acres for developing the Group Housing Colony in sector - 102 & 102A, Gurugram. 2. Thereafter, out of the total licensed area of 17.9875 Acres, an area admeasuring 12.85625 Acres was migrated and a fresh license bearing no. 44 of 2021 dated 12.08.2021 was granted to the Landowner in collaboration with Adani M2K Projects LLP for setting up a Residential Plotted Colony under DDJAY over an area admeasuring 14.99375 acres (12.85625 acres after part migration from License no. 24 of 2012 dated 27.03.2012 along with 2.1375 acres fresh area). 3. This above licensed 44 of 2021 dated 12.08.2021 was registered with the Authority vide Registration no. 84 of 2021 dated 13.12.2021 for the development of Residential Plotted Colony under DDJAY-2016 and 45 of 2023 dated 06.03.2023 for the development of Distinct Commercial Component of DDJAY Plotted Colony over area admeasuring 0.5996 acres, respectively. 4. Change of developer permission from M/s Adani M2K Projects LLP (License no 24 of 2012 for an area admeasuring 5.13125 acres) to M/s Adani M2K Realtors LLP has been granted by DTCP vide memo no. LC-2388/JE(AK)/2024/37494-99 dated 02.12.2024. 5. The Director, Town and Country Planning, Haryana has granted license no. 131 of 2025 dated 29.07.2025 valid up to 28.07.2030 to M/s Radhey Buildhome Pvt. Ltd. in collaboration with M/s Adani M2K Realtors LLP for an additional area measuring 0.03125 acres in residential group housing colony measuring 5.13125 acres (under license no 24 of 2012 dated 27.03.2012 renewed up to 26.03.2030) thereby making the total site area measuring 5.1625 acres for setting up of Group Housing Colony in Sector-102 and 102A, Gurugram. 6. Thereafter, DTCP has approved the revised demarcation cum zoning plan vide Drg. no. DTCP 11302 dated 30.07.2025 and phasing plan vide memo no ZP-796/SD(RD)/2025/48077 dated 18.12.2025. Further, building plan has been approved vide memo. no. ZP-796/SD(RD)/2026/2462 dated 20.01.2026 valid up to 19.01.2031 from department of Town and Country Planning, Haryana. 7. Now, the promoter has applied for registration of the Group Housing colony project namely "The Marq" having an area measuring 5.1625 acres (5.13125 acres under license no 24 of 2012 dated 	

27.03.2012 and 0.03125 acres under license no. 131 of 2025 dated 29.07.2025) u/s 4 of the Act of 2016.

8. Further, the promoter i.e., M/s Adani M2K Realtors LLP, previous developer i.e., M/s Adani M2K Projects LLP and landowner i.e., M/s Radhey Buildhome Pvt. Ltd. has submitted a notarized affidavit through its partner(in the promoter LLP) and Director stating that promoter/developer/landowner hadn't advertised, marketed, booked, sold or offered for sale, or invited persons to purchase in any manner any apartment or building, as the case may be under license no. 24 of 2012 dated 27.03.2012 and license no. 131 of 2025 dated 29.07.2025) or part of it, in any planning area without registering the project with Real Estate Regulatory Authority established under this Act.
9. Further, the public notice has been published in three leading newspapers i.e., The Tribune, Times of India dated 31.01.2026 and Nav Bharat dated 31.01.2026, wherein it is mentioned that promoter has submitted an affidavit regarding non-creation of third-party rights of any kind by the promoter.
10. Further, regarding deposit of late fees (as the license of the project i.e., 24 of 2012 dated 27.03.2012 is prior to RERA Act, 2016), the matter will be discussed in the project hearing and the same shall be payable as per the decision taken in this regard by the Hon'ble Authority.

On 16.02.2026, the matter has been adjourned to 18.02.2026 at 3pm.

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| <p>31. Present compliance status as on 18.02.2026 of deficit documents as observed during the last hearing dated 16.02.2026.</p> | <ol style="list-style-type: none"> 1. Regarding deposit of late fees (as the license of the project i.e., 24 of 2012 dated 27.03.2012 is prior to RERA Act, 2016), the matter will be discussed in the project hearing and the same shall be payable by the promoter, as per the decision taken in this regard by the Hon'ble Authority.
Status - The promoter has submitted a representation, wherein it is stated that building plan has been approved by department of Town and Country Planning, Haryana vide memo. no. ZP-796/SD(RD)/2026/2462 dated 20.01.2026 valid up to 19.01.2031. Further, promoter/developer/landowner hadn't advertised, marketed, booked, sold or offered for sale, or invited persons to purchase in any manner any apartment or building, as the case may be under license no. 24 of 2012 dated 27.03.2012 and license no. 131 of 2025 dated 29.07.2025) or part of it, in any planning area without registering the project with Real Estate Regulatory Authority established under this Act. 2. 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 - Not Submitted. 3. Corrections in online DPI need to be done.
Status - Submitted but need to be revised. 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. 5. The license no 24 of 2012 dated 27.03.2012 renewed up to 26.03.2030 for an area admeasuring 17.9875 acres in Sector-102 & 102 A, Gurugram has been issued by DTCP. You are therefore required to provide the status of registration and approval of |
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		<p>building plans by DTCP pertaining to license no 24 of 2012 dated 27.03.2012. You are further required to provide the status of development works on site along with photographs.</p> <p>Status - Submitted and promoter states that, they have received the Environmental Clearance (EC) on 21.01.2026 itself and mining permission is still pending, therefore construction has not yet started, only cleaning and site establishment work is going on.</p> <p>The promoter/developer further undertake that the said proposed Group Housing Colony on land measuring 5.16125 acres (5.13125 + 0.03125) under the license no 24 of 2012 and license no. 131 of 2025 was never conceptualized over the said licensed area nor any building plan was approved before 20.01.2026 and affidavit to the same has also been submitted.</p> <p>6. Environmental clearance needs to be submitted. Status - Submitted.</p> <p>7. Fire scheme approval needs to be submitted. Status - Not Submitted and applied on 02.02.2026.</p> <p>8. Approved Service plan and Estimates need to be submitted. Status - Not Submitted and applied on 02.02.2026</p> <p>9. Mining permission needs to be submitted. Status - Not Submitted.</p> <p>10. Electrical load availability connection for license no 131 of 2025 needs to be submitted. Status - Not Submitted for license no 131 of 2025, further promoter states that electrical assurance for license no 24 of 2012 has been submitted and further undertake to submit the approved electrical scheme of the said project within 6 months from the issuance of registration certificate.</p> <p>11. Collaboration agreement of license no 131 of 2025 need to be submitted. Status - Submitted.</p> <p>12. Collaboration agreement (for license no 24 of 2012) between old developer i.e., M/s Adani M2K Projects LLP and new developer i.e., M/s Adani M2K Realtors LLP need to be submitted. Status - Not Submitted, further promoter states that, after migration of land admeasuring 12.85625 acres land, joint development agreement between landowner and previous developer was terminated on dated 18.12.2023 and after that promoter received COD permission from M/s Adani M2K Projects LLP to M/s Adani M2K Realtors. Termination deed dated 18.12.2023 is submitted.</p> <p>13. Road access permission needs to be submitted. Status -Submitted.</p> <p>14. Draft allottees documents i.e., application form, allotment letter, builder buyer agreement & conveyance deed needs to be revised. Status - Submitted.</p> <p>15. Superimposed demarcation plan on approved site plan needs to be submitted. Status - Submitted.</p> <p>16. Draft brochure and advertisement need to be revised. Status - Submitted.</p>
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		<p>17. Land cost needs to be clarified according to area apply for registration. Status - Submitted.</p> <p>18. Background of the promoter needs to be submitted. Status - Submitted.</p> <p>19. Affidavit regarding payment to landowner as per compliance of section 4(2)(1)(D) needs to be submitted. Status - Submitted.</p> <p>20. Financial resources need to be met with project cost. Status - Submitted.</p>
32.	Remarks	<p>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.</p> <p>2. Corrections in online DPI need to be done.</p> <p>3. Fire scheme approval needs to be submitted.</p> <p>4. Approved Service plan and Estimates need to be submitted.</p> <p>5. Mining permission needs to be submitted.</p> <p>6. Electrical load availability connection for license no 131 of 2025 needs to be submitted.</p>

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 Fire Scheme, Approved Service plan and Estimates and the documents mentioned above at S.No 32.

The promoter shall submit the BG/DD amounting to Rs. 25 lakhs as a security amount for submission of Approved Fire Scheme, Approved Service plan and estimates within 4 months from the grant of registration, Approved Electrification plan within 6 months from the date of grant of registration and mining permission before the commencement of the construction at site.

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

Asha
Asha

Chartered Accountant

Shashank

Shashank Sharma
Associate Engineer Executive

Day and Date of hearing

Wednesday and 18.02.2026

Proceeding recorded by

Ram Niwas

PROCEEDINGS OF THE DAY

Proceedings dated: 18.02.2026.

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

Sh. Anoop Sharma (AR), Sh. Satyendra Tiwari (AR), Sh. Satinder Singh (AR) and Sh. Govind (AR) are present on behalf of the promoter.

The Authorized Representative of the promoter submits that first building plans for the area admeasuring 5.16125 acres was approved by the Department of Town and Country Planning, Haryana vide memo. no. ZP-796/SD(RD)/2026/2462 dated 20.01.2026 and the same is valid up to 19.01.2031. Further, promoter/developer/landowner hadn't advertised, marketed, booked, sold or offered for sale, or invited persons to purchase in any manner any apartment or building, as the case may be under license no. 24 of 2012 dated 27.03.2012 and license no. 131 of 2025 dated 29.07.2025 or part of it, in any planning area without

registering the project with the Haryana Real Estate Regulatory Authority, Gurugram established under this Act.

The Authorized Representative of the promoter further states that presently 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 Fire Scheme Approval and Approved Service Plans and Estimates within 4 months from the date of grant of registration;
- ii. Approved Electrification plan within 6 months from the date of grant of registration; and
- iii. Mining permission before the start of construction.

Further, he undertakes to submit two Demand Drafts 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 two separate Demand Drafts, 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. Fire Scheme Approval: Within 4 months from the date of grant of registration; and
- b. 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:

- a. Approved Electrification plan within 6 months from the date of grant of registration; and
- b. Mining permission before commencement of the construction at site.

As far as levying of late fees is concerned, the Authority took note of earlier advice received from the Advocate General, Haryana in respect of the Group Housing Colony namely "GH-63" located at Sector-63, Gurugram in the case of M/s DLF Ltd. wherein it was opined that if a promoter had neither developed the project nor advertised, marketed, booked, sold, or offered the project for sale, imposition of the late fee would not be warranted.

In the present case, the license was approved in the year 2012, i.e., License No. 24 of 2012. However, the building plans of the said project were approved by DTCP vide Memo No. ZP-796/SD(RD)/2026/2462 dated 20.01.2026. In view of the earlier advice received from the Advocate General, Haryana, late fee in the present case of registration is not justifiable and hence imposition of the late fee is not warranted in the present case of registration.

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 two DD's of Rs. 25 lakhs each for submission of Fire Scheme approval and Approved Service Plans and Estimates within the timeframe mentioned above.



(Arun Kumar)
Chairman, HARERA