

Hearing brief for registration of Project u/s 4

S.No.	Particulars	Details		
1.	Name of the project	Trehan Seventy One -C		
2.	Name of the promoter	M/s Trehan Hospitality and Reality Pvt. Ltd.		
3.	Brief of the promoter	M/s Trehan Hospitality and reality Pvt Ltd is incorporated dated 13.07.2016 having its registered address at Plot No. 641, Sector 38, Near Subhash Chowk, Gurugram, Haryana. Mr. Saransh Trehan, Mr. Nisarg Trehan and Mr. Harsh Trehan are the director of the promoter company.		
4.	Nature of the project	Residential Floors		
5.	Location of the project	Sector- 71, Gurugram		
6.	Legal capacity to act as a promoter	Conveyance Deed Holder (Third Party Right Holder)		
7.	Name of the license holder	N/A		
8.	Status of project	New		
9.	Whether registration applied for whole	Whole		
	Phase no.	N/A		
10.	Online application ID	RERA-GRG-PROJ-2176-2026		
11.	License no.	N/A		N/A
12.	Total licensed area	13.6775 acres	Area to be registered	0.5536 acres (2240.55 sqm)
13.	Projected completion date	REP-II needs to be revised.		
14.	QPR Compliances (if applicable)	N/A		
15.	4(2)(I)(D) Compliances (if applicable)	N/A		
16.	4(2)(I)(C) Compliances (if applicable)	N/A		
17.	Status of change of bank account	N/A		
18.	Details of proceedings pending against the project	N/A		
19.	RC Conditions Compliances (if applicable)	N/A		
20.	Total Project cost	Rs 92.47/- crores		
21.	Project Expenditure So far	Rs 92.47/- crores		
22.	Estimates expenditure for completion so far	NIL		
23.	Statutory approvals either applied for or obtained prior to registration			
	S.No	Particulars	Date of approval	Validity upto
	i)	License Approval	N/A	N/A
	ii)	Zoning Plan Approval	7987 dated 28.10.2021	.



				(For Affordable Residential Plotted Colony)
	iii)	Building Approval plan	Under Self certification policy 25.09.2024 26.09.2024 03.10.2024 01.08.2024	24.09.2026 25.09.2026 02.10.2026 31.07.2026
	iv)	Environmental Clearance	N/A	N/A
	v)	Airport clearance height	N/A	
	vi)	Fire scheme approval	N/A	
	vii)	Service plan and estimate approval	LC-4204-4257/JE(VA)/2022/1575 dated 20.01.2022 (For Affordable Residential Plotted Colony under DDJAY)	
24.	Fee Details			
	Registration Fee		Residential - (For 15 plots) 5915.052 * 2.64 * 10 = Rs 1,56,157/-	
	Processing Fee		5915.052 * 10 = Rs 59,151/-	
	Late Fee		N/A	
	Total Fee		Rs 2,15,308/-	
25.	DD amount		Rs 1,00,000/- Rs 1,15,308/-	
	DD no. and date		509866 dated 13.02.2026 509940 dated 10.03.2026	
	Name of the bank issuing		ICICI Bank	
	Deficient amount		NIL	
26.	File Status		Date	
	File received on		13.02.2026	
	First notice Sent on		06.03.2026	
	First hearing on		09.03.2026	
	Second hearing on		16.03.2026	
	Third hearing on		30.03.2026	
	Fourth hearing on		04.05.2026	
27.	Case History: The Promoter M/s Trehan Hospitality and Reality Pvt. Ltd. who is a Conveyance Deed Holder/ Third Party Right Holder has applied for the registration of real estate residential floors project namely "Trehan Seventy One -C" located at Sector- 71, Gurugram under section 4 of the Real Estate (Regulations and Development) Act, 2016 vide central receipt no. 107426 dated 13.02.2026 and RPIN- 1029. The Temp I.D. of REP - I (Part A-H) is RERA -GRG-PROJ- 2176-2026. The project area for registration is 0.5536 acres (2240.55 sqm)			



The DTCP has granted license no. 33 of 2021 dated 07.07.2021 valid upto 07.07.2026 for the development of affordable residential plotted colony under DDJAY for an area admeasuring 13.6775 acres.

The affordable residential plotted colony under DDJAY being developed by M/s Good Earth Plotted Development Pvt. Ltd (Formerly known as Raj Buildwell Pvt. Ltd.) is registered vide registration number 2021/83 dated 16.11.2021. Further, extended upto 31.12.2025 u/s 6. Now, applied for the continuation of registration of project under Section 7(3) and is in process.

The conveyance deed has been executed in the name of M/s Trehan Hospitality and Reality Pvt. Ltd.

Now, the promoter has applied for the registration of 60 residential floors on 15 plots.

Details of plots applied for registration are as follows:-

Details of plots							
S.no	Plot no	Conveyance Deed	BR-III date	OC date	Area in sq mtr	FAR	Total FAR
1.	5	23-Feb-24	26-09-2024	07-07-2025	148.525	2.64	392.106
2.	22	16-Feb-24	26-09-2024	11-02-2025	149.65	2.64	395.076
3.	27	19-Mar-24	25-09-2024	11-02-2025	149.65	2.64	395.076
4.	36	19-Mar-24	26-09-2024	10-03-2025	149.65	2.64	395.076
5.	110	22-Feb-24	03-10-2024	24-03-2025	149.65	2.64	395.076
6.	119	22-Mar-24	26-09-2024	24-03-2025	149.65	2.64	395.076
7.	121	22-Feb-24	26-09-2024	24-03-2025	149.65	2.64	395.076
8.	132	03-Jan-24	26-9-2024	16-12-2024	149.65	2.64	395.076
9.	134	02-Jan-24	26-09-2024	10-03-2025	149.65	2.64	395.076
10.	136	20-Dec-23	26-9-2024	16-12-2024	149.65	2.64	395.076
11.	139	15-Dec-23	26-9-2024	16-12-2024	149.65	2.64	395.076
12.	174	25-Oct-23	1-8-2024	26-11-2024	149.65	2.64	395.076
13.	188	31-Oct-23	26-9-2024	16-12-2024	149.65	2.64	395.076
14.	163	12-Dec-23	26-09-2024	10-03-2025	146.575	2.64	386.958
15.	112	29-Mar-24	26-09-2024	24-03-2025	149.65	2.64	395.076
Total					2240.55		5915.052



The application for registration of residential floors was scrutinized and 1st deficiency notice vide notice no. HARERA/GGM/RPIN/1029 dated 06.03.2026 was issued to the promoter with an opportunity of being heard on 09.03.2026.

On 09.03.2026, the matter is adjourned and fixed for 16.03.2026.

The promoter has submitted a reply on 02.03.2026 which was scrutinized wherein the promoter has submitted the copy of Public Notice in three newspapers i.e., The Hindu (English), Hindustan Times (English) and Punjab Kesari (Hindi) dated 24.02.2026 for objection till 09.03.2026.

On 16.03.2026, the matter is adjourned and fixed for 30.03.2026.

The objection dated 09.03.2026 has been submitted by Deepak on behalf of M/s Good Earth Plotted Development Pvt. Ltd. and states that these objections are placed on record in order to highlight certain material facts and regulatory concerns relating to the manner in which development activities have been undertaken across the plots for registration is being sought and the subsequent filing of the present applications seeking registration after default had been noticed by this Hon'ble Authority.

The land forms part of Licensed Colony No. 33 of 2021 dated 08.07.2021 granted by the Department of Town & Country Planning, Haryana to M/s. Good Earth Plotted Development Pvt. Ltd. (formerly known as Raj Buildwell Pvt. Ltd), the plotted developer and the Plotted Development stands registered with the Hon'ble Authority as "One Good Earth" under Registration No. 83 of 2021 dated 16.11.2021.

The present applications relate to mass development undertaken by one Trehan Hospitality & Reality Pvt Ltd (THRPL) through construction of multiple residential floors, across plots within the said licensed colony. The applications have been filed by THRPL only after almost the entire construction has already been completed, residential floors have been marketed and sold to third parties, possession has already been delivered to such floor purchasers (without any intimation to the Plotted Developer). In the wake of the above regulatory breaches, the construction activities came under scrutiny of the concerned statutory authorities, who noted serious regulatory concerns in relation to the alleged unauthorised construction and development of floors. The timing and sequence of these events are therefore material and merit careful consideration.

It is submitted that M/s Trehan Hospitality & Reality Pvt. Ltd. (THRPL) and its associates purchased approximately 103 plots from Good Earth Plotted Development Pvt. Ltd. (GEPDPL) within the licensed colony and thereafter undertook construction of independent residential floors on the said plots, which in aggregate are 412 residential floors. Section 3(1) of the Real Estate (Regulation and Development) Act, 2016 mandates that no promoter shall advertise, market, book, sell or offer for sale any plot, apartment or building in a real estate project without obtaining prior registration from the Real Estate Regulatory Authority. Further, in terms of Section 3(2), such registration is mandatory where the land proposed to be developed exceeds 500 square meters or the number of apartments proposed to be developed exceeds eight, inclusive of all phases. It is a matter of record that construction, marketing as well as sales of the residential floors as constructed by THRPL was undertaken without obtaining the mandatory prior RERA registration under the Real Estate (Regulation and Development) Act, 2016. The Hon'ble Authority itself issued Show Cause Notice dated 30.10.2025 under Section 3(1) of the RERA Act noting that the applicant had undertaken construction and marketing of residential floors on 103 plots and constructed approximately 412 floors without obtaining registration certificate under the Act. The said notice records that the promoter had advertised, marketed and offered for sale residential floors using the

RERA registration number pertaining to the plotted colony obtained by Good Earth Plotted Development Pvt. Ltd. (GEPDPL), thereby not only misleading the buyers as well as prima facie violating Section 3(1) of the Act. The present applications dated 13.02.2026 have therefore been filed after the commencement, substantial execution of development activity and after creating third party rights. Public notices for the same had been published as recent as on 23.02.2026.

Environmental proceedings have also been initiated by the competent authorities in relation to the development undertaken by the applicant. A complaint was forwarded by the Ministry of Environment, Forest & Climate Change, pursuant to which a site inspection was conducted on 01.08.2025 by the Regional Office, Chandigarh. Construction activity has been undertaken across approximately 103 plots.

The inspection also records the compliance deficiencies such as No Consent to Establish (CTE) obtained prior to construction of the independent floors, No Consent to Operate (CTO) obtained prior to handing over possession of residential units, Construction undertaken without installation of adequate sewage treatment infrastructure resulting in generation of wastewater without regulatory consent and Continued construction activity despite the above regulatory deficiencies being noted during inspection. The inspection further records that No Environmental Clearance (EC) had been obtained from SEIAA / MoEF&CC despite the cumulative built-up area exceeding the environmental appraisal threshold, which constitutes a major regulatory violation. Based on similar findings, the Haryana State Pollution Control Board has issued Show Cause Notice initiating proceedings under the Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981 for undertaking construction without obtaining mandatory environmental consents. Annexure-4 (HSPCB Show Cause Notices dated 04.06.2025 and 15.09.2025).

Construction is still going on and THRPL has given possession in a haphazard manner, for their financial gains, to their respective Floor/ Unit buyers without any intimation to the Plotted Developer while the overall Project development was still underway. The aforesaid act has lead to serious breaches in terms of health, safety of other residents as well as has damaged the infrastructure developed by the Plotted Developer multiple times. It is further observed and reported that M/s Trehan Hospitality & Reality Pvt. Ltd. (THRPL) has failed to put in place the necessary systems for receiving and distribution of Sewage Treated water for flushing system for the floors constructed by them, thereby neglecting the essential infrastructure required under the applicable regulations for proper sanitation, environmental compliance and sustainable functioning of the residential units.

Violation of Building Bye-laws and Planning Norms: The construction carried out across adjoining plots reflects de facto amalgamation and integrated structural development, including basement construction beyond permissible setback norms (which are non-compoundable) and absence of mandatory partition walls between plots, resulting in structurally continuous development across multiple plots in violation of applicable building bye-laws and planning regulations. Further, the DDJAY Policy 2016 Clause 4 (i) clearly states that; "Clubbing of residential plots for approval of integrated zoning plan of two adjoining plots under same ownership shall not be permitted in the colonies approved under the present policy". Such construction materially alters the planning configuration, built-up intensity, structural footprint and environmental load of the development.

Instead of filing a single composite registration application, the applicant has filed six separate registration applications titled "Trehan Seventy One - A, B, C, D, E & F". However, regulatory inspections and proceedings already on record indicate that the construction activity undertaken by the applicant spans approximately 103 plots, resulting in about 412 residential floors with a cumulative built-up area of approximately 70,000 sq. meters. The recorded scale of development substantially exceeds the 20,000 sq. meter threshold prescribed under the



Environmental Impact Assessment framework, which ordinarily attracts the requirement of prior Environmental Clearance. The filing of multiple applications therefore appears to divide what is in substance a large and contiguous development across numerous plots into smaller segments presented as independent projects.

Thus, the present applications arise in a situation where construction, marketing and sale of residential units had already taken place prior to registration, rather even possession given, which is contrary to the statutory requirement of prior registration contemplated under Section 3 of the Real Estate (Regulation and Development) Act, 2016. In the circumstances outlined above, the applications filed by M/s Trehan Hospitality & Reality Pvt. Ltd. are respectfully objected to, as they appear to have been initiated only after regulatory scrutiny and issuance of show cause notices by the concerned authorities. The record already reflects that the applicant has undertaken large-scale development across multiple plots involving effective amalgamation of plot layouts, construction of basements beyond prescribed setback norms (which are non-compoundable) and integrated structural development across adjoining plots. The buyers have been misled through representations suggesting that the RERA registration granted for the plotted colony extended to the residential floors developed by THRPL, thereby creating an impression of regulatory approval. In effect, mass construction and sale of residential floors was undertaken without complying with the mandatory requirement of prior registration under the RERA Act. The present applications therefore appear to be an attempt to seek post-facto and retrospective regulatory regularization of such development undertaken in disregard of the mandatory RERA framework, including deviations which prima facie fall within the category of non- compoundable violations under the applicable planning and building regulations.

The complainant requested that permitting such post-facto regularisation may inadvertently encourage similar practices whereby development is undertaken first and regulatory approvals are sought thereafter. In the interest of maintaining regulatory discipline and to set an appropriate precedent under the Real Estate (Regulation and Development) Act, 2016, it is further submitted that the violations noted in the present matter may warrant strict regulatory action, including imposition of appropriate penalties as contemplated under the Act, so as to discourage such practices and safeguard the interests of homebuyers as well as compliant developers operating within the statutory framework.

The objection dated 13.03.2026 has been submitted by Venkatesh on behalf of JMD Limited stating that Illegal conveyance of the Plots by M/s Good Earth Plotted Development Pvt. Ltd. After perusal of the Public notice reveals that M/s Trehan Hospitality and Reality Pvt. Ltd. claims to be the Conveyance deed holder of the plots on which seeks registration under the RERA Act, 2016 for development of Residential Floors. It is further pertinent to note that the said Registration Certificate No. 83 of 2021 for the project "One Good Earth" has already been extended up to 31.12.2025 under Section 6 of the Real Estate (Regulation and Development) Act, 2016 ("RERA Act, 2016") vide Extension No. 23 of 2025 dated 23.05.2025, and an application for continuation under Section 7(3) of the RERA Act, 2016 has also been preferred. It is most respectfully submitted that the aforesaid facts clearly demonstrate that the project of GEPD has, as on date, not been granted a Completion Certificate by the Competent Authority, as is evident from the fact that the promoter has sought continuation of the Registration Certificate under Section 7(3) of the RERA Act, 2016. In such circumstances, the handing over of possession and transfer of rights in respect of the said plots to M/s Trehan Hospitality and Reality Pvt. Ltd. is in clear contravention of various provisions of the RERA Act, 2016 including but not limited to Section 17 of the RERA Act, 2016, which mandates handing over of possession and execution of conveyance deed only upon completion of the project and issuance of the Completion Certificate. **Consequently, M/s Trehan Hospitality and**



Reality Pvt. Ltd. derives no valid or lawful title over the said land, and therefore seeks registration of the proposed project on the basis of a defective and legally untenable title.

It is humbly submitted that GEPD could not have sold/ conveyed by way of executing Conveyance Deeds the Plots hereunder, as the Objector has already challenged the RC no 83 of 2021 dated 16.11.2021 before the Hon'ble Haryana Real Estate Appellate Tribunal ("Appellate Tribunal") vide Appeal No. 714 of 2022 titled as "JMD Ltd. vs Haryana Real Estate Regulatory Authority & Raj Buildwell Pvt. Ltd.", which is still pending adjudication and is next listed for hearing on 09.04.2026. In view of the above, as the Registration Certificate no 83 of 2021 is already under challenge and the land under question is sub-judice before the Appellate Tribunal therefore, no proper right and title can be conveyed to M/S Trehan Hospitality and Reality Pvt. Ltd.

The certain essential facts and the conduct of GEPD it is submitted that the Objector and GEPD entered into an MOU dated 22.08.2007 and ATS dated 02.08.2013, wherein the Objector was assured certain area in the proposed development by the GEPD qua which, the Objector invested a sum of Rs. 13,85,00,000/- (Rupees Thirteen Crores and Eighty-Five Lakhs Only). The assurances made by the GEPD never saw the light of the day as the project was never completed and the GEPD failed to act on the terms and condition of the MOU dated 22.08.2007 and ATS dated 02.08.2013. The Objector apprehending the ill-motivated move of GEPD and fearing the defeat of the purpose and the rights of the Objector under the MOU and ATS on 12.10.2020, preferred a petition bearing no. OMP (I) (COMM) No. 349 of 2020, under Section 9 of the Arbitration and Conciliation Act 2016, ("Arbitration Act") before the Hon'ble High Court of Delhi ('Section 9 Petition').

The Managing Director of GEPD at the time of the final disposal of the Section 9 Petition on 19.01.2021 undertook to secure 1,05,000 sq. ft. (One lakh and five thousand only) of the covered area along with proportionate covered and open parking space in favour of the Objector. Thereafter, the Managing Director of GEPD furnished an unconditional and unequivocal undertaking by way of an affidavit, and the relevant portion of the said undertaking is extracted herein below: -

"... 4. Accordingly, on behalf of the Company, the Deponent undertakes to this Hon'ble Court that the Company will provide to the petitioner, built up space to the extent of 105,000 sq. ft. area in the housing project, being the Deen Dayal Upadhyay Jan Awas Yojana ("Project"). The said built up space will be provided by the Company to the petitioner in accordance with the terms of the memorandum of understanding dated 22.08.2007 ("MoU") executed between Raj Buildwell Pvt. Ltd. and JMD Ltd., subject to the outcome of the arbitration proceedings between the parties ..."

The aforesaid order also recorded that since the undertaking was given to the Hon'ble High Court of Delhi the same would suffice as the security of the Objector till the disposal of the claim. Subsequent thereto, on 19.01.2021 the petitions preferred by the GEPD and Objector under Section 11 of the Arbitration Act were allowed and Justice (Retd) V.K. Jain, Sole Arbitrator ("Ld. Sole Arbitrator") was appointed to adjudicate the disputes between the GEPD and the Objector.

All throughout the litigation prima facie the Hon'ble Courts found the interest of the Objector to be legitimate and therefore, injuncted the GEPD from parting possession and/or creating third-party rights or interest concerning to at least 20 plots in the proposed development, thereby, securing the Objector.

The complainant requested the Authority to



1. Reject the Application for registration of Independent Residential Floors Project Namely "Trehan Seventy One -A" by M/S Trehan Hospitality and Reality Pvt. Ltd.
2. Initiate an inquiry/ investigate into how GEPD could have handed over possession and executed conveyance deed with M/S Trehan Hospitality and Reality Pvt. Ltd. without obtaining the Completion certificate for its Plotted Colony Project from the Competent Authority.
3. Provide an opportunity to the Objectors to make detailed submissions at a later stage, if required.
4. Pass any such order as the Ld. Authority deems fit and in the interest of justice.

The objection dated 13.03.2026 has been submitted by Pankaj Sehgal and states that the colony "One Good Earth", Sector-71, Gurugram is a licensed residential plotted development developed under DTCP License No. 33 of 2021 and registered with HARERA as a plotted colony. Individual plots were purchased by residents with the expectation that construction within the colony would take place in accordance with approved building norms and the character of a plotted residential neighborhood.

Over time, however, THRPL and associates acquired a large number of plots within the colony - reportedly around 103 plots - and undertook construction of builder floors across these plots, resulting in approximately 412 residential floors. Residents have observed large-scale construction across adjoining plots, including multiple basements extending into areas meant to remain as setbacks and construction being carried out in a continuous manner across multiple plots. In effect, what appears on the ground is a consolidated form of development spread across several plots rather than independent development of individual plots, raising serious concerns among residents regarding compliance with the planning framework governing the colony.

Concerned by these developments, several residents had earlier submitted representations before the relevant authorities highlighting these issues. Taking cognizance of these complaints, the Directorate of Town & Country Planning, Haryana, vide Memo dated 02.03.2026, has already forwarded the matter to the District Town Planner (Enforcement), Gurugram for examination and submission of an Action Taken Report. It has also come to light that construction, marketing and sale of these residential floors had already taken place before obtaining registration under the Real Estate (Regulation and Development) Act, 2016, which requires registration before any real estate project is advertised or sold. In this regard, the Hon'ble Authority had earlier issued a Show Cause Notice dated 30.10.2025 under Section 3(1) of the Act noting that residential floors had been constructed and marketed across numerous plots without obtaining registration.

Subsequently, it now appears that multiple RERA registration applications have been filed by THRPL on 13.02.2026 under different project names — "Trehan Seventy One A, B, C, D, E and F" — each covering different groups of almost 81 plots owned by same entity Trehan The Hospitality & Reality Pvt Ltd, within the same colony and under the same license. bifurcation of the development into multiple plot-wise applications therefore appears to be a conscious attempt to present a large integrated development of almost 81 plots (as covered under these multiple applications out of overall 103 owned and developed by THRPL and Associates) with approx. 324 Floors (as covered under these Applications out of overall approx. 412 floors constructed by THRPL & Associates), as several smaller independent projects. Such divided Applications, effectively disguises and hides the true scale of such large construction and circumvents statutory scrutiny that would otherwise apply to a development of this magnitude, including the requirement of prior Environmental Clearance and other regulatory approvals.



Thus, the present RERA applications effectively result in seeking post-facto regularization of development already undertaken, including unauthorized construction already under examination by regulatory authorities.

It is humbly submitted that allowing registration in such circumstances may set an undesirable precedent where large-scale construction and sale activities are undertaken first and approvals are sought later. Such registration may effectively enable developers to bypass scrutiny by the concerned departments that are already examining the legality of the construction and may open avenues for others to undertake unauthorised constructions in violation of approved building plans and subsequently seek to legitimise them through similar registrations. This would defeat the very purpose of the RERA Act, which is meant to ensure transparency and intended to safeguard the interests of homebuyers. Developers like Trehan should not be allowed to fleece the homebuyers and take advantage of the system in a way that may mislead such genuine buyers into believing that all approvals are in place, while serious compliance issues may still remain unresolved.

The promoter has submitted a reply on 19.03.2026 which was scrutinized and the remaining deficiencies were conveyed to the promoter.

On 30.03.2026, Sh. Ashish Kush, Planning Executive and Ms. Asha, Chartered Accountant briefed about the facts of the case. Sh. Pankaj Sehgal, Sh. Santosh Walia, Sh. Venkat Rao, Ms. Ankita Saikia and Sh. Gaurav Raghav are present on behalf of the complainant. Sh. Ramanjit Sahni and 5 others are present on behalf of the complainant i.e., M/s Good Earth Plotted Development Pvt. Ltd. Sh. Saransh Trehan, Sh. Archit along with Sh. Harshit Batra (Adv.) and Ms. Tanya (Adv.) are present on behalf of the promoter.

The complainants state that THRPL and associates acquired a large number of plots within the colony - reportedly around 103 plots - and undertook construction of builder floors across these plots, resulting in approximately 412 residential floors. Residents have observed large-scale construction across adjoining plots, including multiple basements extending into areas meant to remain as setbacks and construction being carried out in a continuous manner across multiple plots. Concerned by these developments, several residents had earlier submitted representations before the relevant authorities. Taking cognizance of these complaints, the Directorate of Town & Country Planning, Haryana, vide Memo dated 02.03.2026, has already forwarded the matter to the District Town Planner (Enforcement), Gurugram for examination and submission of an Action Taken Report. Subsequently, it now appears that multiple RERA registration applications have been filed by THRPL on 13.02.2026 under different project names — "Trehan Seventy One A, B, C, D, E and F" — each covering different groups of 81 plots owned by same entity Trehan Hospitality & Reality Pvt Ltd, within the same colony. Bifurcation of the development into multiple plot-wise applications therefore appears to be a conscious attempt to present a large integrated development of 81 plots (as covered under these multiple applications out of overall 103 owned and developed by THRPL and Associates) with 324 Floors (as covered under these Applications out of overall 412 floors constructed by THRPL & Associates). Such divided Applications, effectively disguises and hides the true scale of such large construction that would otherwise apply to a development of this magnitude, including the requirement of prior Environmental Clearance and other regulatory approvals. It is humbly submitted that allowing registration in such circumstances may set an undesirable precedent where large-scale construction and sale activities are undertaken first and approvals are sought later. This would defeat the very purpose of the RERA Act, which is meant to ensure transparency and intended to safeguard the interests of homebuyers. Developers like Trehan should not be allowed to fleece the homebuyers and take advantage of the system in a way that may mislead such genuine buyers into believing that all approvals are in place, while serious compliance issues may still remain unresolved.



Further, the Environmental proceedings have also been initiated by the competent authorities in relation to the development undertaken by the applicant. A complaint was forwarded by the Ministry of Environment, Forest & Climate Change, pursuant to which a site inspection was conducted on 01.08.2025 by the Regional Office, Chandigarh. Construction activity has been undertaken across approximately 103 plots. The inspection also records the compliance deficiencies such as No Consent to Establish (CTE) obtained prior to construction of the independent floors, No Consent to Operate (CTO) obtained prior to handing over possession of residential units, Construction undertaken without installation of adequate sewage treatment infrastructure and Continued construction activity despite the above regulatory deficiencies being noted during inspection. The inspection further records that No Environmental Clearance (EC) had been obtained from SEIAA / MoEF&CC despite the cumulative built-up area exceeding the environmental appraisal threshold, which constitutes a major regulatory violation. The Haryana State Pollution Control Board has issued Show Cause Notices dated 04.06.2025 and 15.09.2025 initiating proceedings under the Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981 for undertaking construction without obtaining mandatory environmental consents.

The construction carried out across adjoining plots reflects de facto amalgamation and integrated structural development, including basement construction beyond permissible setback norms (which are non-compoundable) and absence of mandatory partition walls between plots, resulting in structurally continuous development across multiple plots in violation of applicable building bye-laws and planning regulations. Further, the DDJAY Policy 2016 Clause 4 (i) clearly states that; "Clubbing of residential plots for approval of integrated zoning plan of two adjoining plots under same ownership shall not be permitted in the colonies approved under the present policy". Such construction materially alters the planning configuration, built-up intensity, structural footprint and environmental load of the development.

Instead of filing a single composite registration application, the applicant has filed six separate registration applications titled "Trehan Seventy One - A, B, C, D, E & F". However, regulatory inspections and proceedings already on record indicate that the construction activity undertaken by the applicant spans approximately 103 plots, resulting in about 412 residential floors with a cumulative built-up area of approximately 70,000 sq. meters. The recorded scale of development substantially exceeds the 20,000 sq. meter threshold prescribed under the Environmental Impact Assessment framework. The filing of multiple applications therefore appears to divide what is in substance a large and contiguous development across numerous plots into smaller segments presented as independent projects.

The counsel appearing on behalf of the promoter submits that the six separate applications for registration have been filed on the basis of the respective dates of allotment of plots by M/s Good Earth Plotted Development Pvt. Ltd. It is further contended that the proceedings initiated by the Haryana State Pollution Control Board have been dropped.

The Authority has duly considered the submissions made by all the parties. However, it is observed that the promoter has failed to place on record any documentary evidence in support of its contention regarding the dropping of proceedings by the Haryana State Pollution Control Board. In the absence of any such material, the said submission cannot be accepted at this stage.

Accordingly, the promoter is directed to furnish, within a period of 10 days from the date of this order, all relevant documents evidencing the closure or dropping of proceedings by the Haryana State Pollution Control Board, along with the latest status with respect to the notices issued by the District Town Planner (Enforcement), Gurugram. Further, in view of the nature and gravity of the issues involved, the Authority directs the concerned official to send a letter to the Haryana State Pollution Control Board as well as the District Town Planner



(Enforcement), Gurugram seeking a detailed status regarding the proceedings initiated in the present matter. The office shall ensure due follow-up in respect of the above. The matter to come up on 04.05.2026.

As per the directions of the Authority, a letter to the Haryana State Pollution Control Board as well as the District Town Planner (Enforcement), Gurugram seeking a detailed status regarding the proceedings initiated in the present matter has been issued vide no. HARERA/GGM/PA/Secy./2026/81 dated 08.04.2026 and vide no. HARERA/GGM/PA/Secy./2026/80 dated 08.04.2026.

No reply has been received from HSPCB and DTP (Enforcement), Gurugram.

Further, an objection from Sh. Santosh Walia has been received on 22.04.2026 stating that the promoter has concealed material information, made incorrect disclosures and also stated blatant lies in the said For REP-I, which warrant detailed scrutiny. In this background, the following submissions are place on record for consideration.

1. Upon clicking the website given by M/s THRPL, it is revealed that M/s THRPL and promoters have also recently delivered the following project but intentionally not been disclosed them in form REP-1.
 - (a) Anant Raj Ashok Estate located at Ashok Vihar, Gurugram in which about 192 residential floors have been developed and the same is claimed to have already been delivered within last 5 years.
 - (b) Essencia situated at Sector 67, Gurugram in which about 180 residential floors have been developed and the same is claimed to have already been delivered within last 5 years.
 - (c) Adani Samsara situated at Sector 63, Gurugram in which about 88 residential floors have been developed and the same is claimed to have already been delivered within last 5 years.
 - (d) Trehan NKV Golden Avenue situated at Sector 35, Sohna, Gurugram in which about 216 residential floors have been developed and wherein possession is already offered on majority of floors and rest are stated to be nearing offer of possession.
 - (e) MKV and LID situated at Sector 35, Sohna, Gurugram comprising approx. 400 and 140 residential floors respectively, are stated to have been delivered within last five years. Similarly, BPTP Astaire situated at Sector 70A, Gurugram comprising approx. 184 residential floors, is also have stated to have been delivered within last five years
2. It is pertinent to point out here that in part D, part E, part F and part G, the promoter has intentionally not annexed the documents and plans.
3. In the affidavit-cum-declaration dated 12.02.2026 (uploaded on 13.02.2026), the said declaration appears misleading and prima facie inconsistent with the stage of project. Further, non-default from CA uploaded on 13.02.0226 is not signed and cannot be considered without the signature of the CA.

Thus, it is clear that Form REP-I as well as the documents uploaded by M/s THRPL are aimed at misleading the Authority. It is submitted that such post-facto RERA registration should not be granted in present case, especially when M/s THRPL and its promoter are intentionally trying to mislead the Authority by not only deliberately concealing material facts but also blatantly lying. Granting registration in such circumstances would undermine the mandate of prior registration under the Act. It is further submitted that appropriate proceedings should be initiated, including issuance of Show cause notices to M/s THRPL and its promoters for undertaking construction, development, marketing and selling in all the above mentioned projects, without obtaining mandatory registration under RERA Act. Such action is necessary



	to discourage such non-compliant practices and safeguard the interests of homebuyers as well as compliant developers operating within the statutory framework.	
28.	Present compliance status as on 04.05.2026 of deficient documents conveyed in hearing dated 30.03.2026.	- Regarding the deposit of late fee, 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: To be decided. - Deficit Fee - Rs 1,15,308/- needs to be submitted. Status: Submitted. DD no. 509940 dated 10.03.2026 amounting to Rs 1,15,308/-. - 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. - Online DPI needs to be corrected. Status: Not Submitted. - 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. - Plots on which residential floors has applied for registration needs to be marked on the approved layout plan and needs to be submitted. Status: Submitted. - Booking list of units sold to the allottees as on date of the application applied for amendment which includes name of the allottees, unit no., unit area, date of booking, average rate, total consideration and balance amount to be receive needs to be submitted. Status: Submitted. - List of unsold inventory needs to be submitted. Status: Submitted. - Draft Application form needs to be submitted. Status: The promoter stated that all the units are sold. Hence, the draft application form is not applicable. - Draft Allotment letter needs to be submitted. Status: The promoter stated that all the units are sold. Hence, the draft Allotment letter is not applicable. - Draft Builder Buyer Agreement needs to be submitted.

		Status: The promoter stated that all the units are sold. Hence, the draft Builder Buyer Agreement is not applicable. 12. Draft Conveyance Deed needs to be submitted. Status: Submitted. 13. Draft Brochure needs to be revised. Status: Submitted. 14. Pert Chart needs to be submitted. Status: Submitted but needs to be revised. 15. Five copies of executed Application form, Allotment Letter, Builder Buyer Agreement and Conveyance deed needs to be submitted. Status: The promoter stated that they have only executed the Builder Buyer Agreement and Conveyance deed copy of which has been submitted. 16. Cost of plots needs to be clarified according to area applied for registration. Status: Submitted but needs to be revised. 17. CA Certificate regarding financial details of sold inventory needs to be submitted. Status: Submitted but needs to be revised. 18. Affidavit regarding no loan on project land needs to be submitted. Status: Submitted. 19. Project Report needs to be revised. Status: Submitted. 20. REP II needs to be revised. Status: Submitted. 21. COI needs to be submitted. Status: Submitted. 22. Affidavit regarding 4(2)(I)(D) for separate bank account needs to be revised. Status: Submitted but needs to be revised. 23. Cash flow statement needs to be revised. Status: Submitted but needs to be revised. 24. Quarterly statement of expenditure and resources needs to be revised. Status: Submitted but needs to be revised.
29.	Remarks	1. Regarding the deposit of late fee, 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: To be decided. 2. The annexures in the online application are not uploaded as well as correction needs to be done in the online (A-H) application.



	3. Online DPI needs to be corrected. 4. Pert Chart needs to be revised. 5. Cost of plots needs to be clarified according to area applied for registration. 6. CA Certificate regarding financial details of sold inventory needs to be revised. 7. Affidavit regarding 4(2)(I)(D) for separate bank account needs to be revised. 8. Cash flow statement needs to be revised. 9. Quarterly statement of expenditure and resources needs to be revised.
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Asha
Asha

Chartered Accountant

Ashish
04/5/26

Ashish Kush
Planning Executive

Day and Date of hearing

Monday and 04.05.2026

Proceeding recorded by

H.R. Mehta

PROCEEDINGS OF THE DAY

Proceedings dated: 04.05.2026

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

Sh. Pankaj Sehgal, Sh. Santosh Walia, Ms. Shivani Dang (Advocate), Sh. Ramanjit Sahni and Sh. Gunjan Kumar (Advocate) are present on behalf of the complainant.

Sh. Harshit Batra (Adv.) and Ms. Tanya (Adv.) are present on behalf of the promoter.

The complainants submit that instead of filing a single composite registration application, the promoter has filed six separate registration applications titled "Trehan Seventy One - A, B, C, D, E & F". It is contended that the filing of multiple applications appears to divide what is, in substance, a large and contiguous development into smaller segments projected as independent projects, thereby circumventing the requirement of obtaining Environmental Clearance.

The counsel appearing on behalf of the promoter submits that Environmental Clearance is not required in the present case, as the construction was undertaken after approval of the building plans for individual plots. It is further submitted that separate conveyance deeds have been executed for each individual plot and Occupation Certificates have also been obtained separately for the respective plots.

The Authority observes that the replies from the Haryana State Pollution Control Board as well as the District Town Planner (Enforcement), Gurugram, in response to earlier communications bearing no. HARERA/GGM/PA/Secy./2026/81 dated 08.04.2026 and no. HARERA/GGM/PA/Secy./2026/80 dated 08.04.2026, are still awaited. Accordingly, the office is directed to issue reminder letters to the Haryana State Pollution Control Board and the District Town Planner (Enforcement), Gurugram, for furnishing the requisite reports.

Further, the complainants as well as learned counsel for the promoter seek two weeks' time to file written submissions. The request is allowed. The parties concerned are directed to file their written submissions within two weeks, i.e., on or before 18.05.2026.

The matter is adjourned fixed for 25.05.2026.

Arun Kumar

(Arun Kumar)
Chairman, HARERA