

Project - M2K Olive Green Floors- Phase II
RERA-GRG-2291-2026
Hearing brief for registration of Project u/s 4

S.No.	Particulars	Details
1.	Name of the project	M2K Olive Green Floors- Phase II
2.	Name of the promoter	M/s Sadan Realtech Pvt. Ltd.
3.	Brief of the promoter	M/s Sadan Realtech Private Limited has incorporated dated 21-01-2010 at registered address 4 th Floor, M2K Corporate Park Block N, Mayfield Garder, Sector- 51, Gurugram, Haryana, India, 122003. Mr. Ajikumar Kizhakkilottu Veetil and Mr. Gautam Kumar Bhartia are the directors of the promoter company.
4.	Nature of the project	Residential Floors
5.	Location of the project	Sector-104, Gurugram
6.	Legal capacity to act as a promoter	License Holder
7.	Name of the license holder	M/s Sadan Realtech Pvt. Ltd.
8.	Status of project	New
9.	Whether registration applied for whole	Whole
	Phase no.	N/A
10.	Online application ID	RERA-GRG-PROJ-2291-2026
11.	License no.	174 of 2022 dated 21.10.2022
		Valid upto 20.10.2027
12.	Total licensed area	14.1375 acres
	Area to be registered	1.1678 acres (4725.889 sq mtr)
13.	Projected completion date	OC - 30.06.2031
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	N/A
20.	Number of units	144 residential floors on 36 plots
21.	Carpet Area Range	761.76 sq ft to 873.38 sq ft

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22.	Construction Cost of Tower	Rs 3350/- per sq ft	
23.	Total Project cost	Rs 174.05/- crores	
24.	Project Expenditure So far	Rs 48.78/- crores	
25.	Estimates expenditure for completion so far	Rs 125.32/- crores	
26.	Statutory approvals either applied for or obtained prior to registration		
	S.No	Particulars	Validity upto
	i)	License Approval	174 of 2022 dated 21.10.2022 20.10.2027
	ii)	Zoning Plan Approval	DGTCP 9058 dated 09.03.2023 - (For DDJAY Plotted Colony)
	iii)	Building plan Approval	Under Self certification policy and email dated 27.03.2026 26.03.2028
	iv)	Environmental Clearance	N/A N/A
	v)	Airport height clearance	N/A
	vi)	Fire scheme approval	N/A
	vii)	Revised Service plan and estimate approval	LC-4227/JE(AK)-2024/39056 dated 10.12.2024
27.	Fee Details		
	Registration Fee	Residential – (For 36 plots) 4725.889 * 2.64 * 2.64 * 10 = Rs 3,29,376/-	
	Processing Fee	12,476.34 * 10 = Rs 1,24,763/-	
	Late Fee	N/A	
	Total Fee	Rs 4,54,139/-	
28.	DD amount	Rs 1,00,000/-	
	DD no. and date	000546 dated 04.07.2026	
	Name of the bank issuing	Axis Bank	
	Deficient amount	Rs 3,54,139/-	
29.	File Status	Date	
	File received on	10.07.2026	
	First notice Sent on	28.07.2026	
	First hearing on	03.08.2026	
	Second hearing on	17.08.2026	
30.	Case History: The Promoter i.e., M/s Sadan Realtech Pvt. Ltd. who is a license holder has applied for the registration of real estate residential floors project namely “M2K Olive Green Floors- Phase II” located at Sector- 104, Gurugram under section 4 of the Real Estate (Regulations and Development) Act, 2016 vide central receipt no. 113993 dated		

10.07.2026 and RPIN- 1082. The Temp I.D. of REP – I (Part A-H) is RERA -GRG-PROJ-2291-2026. The project area for registration is 1.1678 acres (4725.889 sq mtr).

The DTCP has granted license no. 174 of 2022 dated 21.10.2022 valid upto 20.10.2027 for the development of Affordable Residential Plotted Colony under DDJAY for an area admeasuring 14.1375 acres.

The land on which these 36 plots (Plot Nos. 172 to 177 and 212 to 241) are proposed for registration has been registered with the Authority in the name of “**M2K Olive Greens**” having RC no 128 of 2022 dated 23.21.2022 valid up to 20.10.2025 which is amended on 14.06.2024.

The Affordable Residential Plotted Colony under DDJAY being developed by M/s Sadan Realtech Pvt. Ltd. is registered vide registration number 2022/128 dated 23.12.2022 amended on 14.06.2024 which was valid upto 20.10.2025. The OC for Community site as Club/ Community building has been obtained vide Memo no. 5356 dated 16.10.2025 and Completion Certificate vide Memo no. LC-4227/JE(AK)/2025/40552 dated 17.10.2025.

Now, the promoter has applied for the registration of 144 residential floors on 36 plots.

Details of plots applied for registration are as follows:-

Details of plots						
S.no	Plot no	BRS III Memo	BR-III date	Area in sq mtr	FAR	Total FAR
1.	172	201/BG	30.04.2025	127.300	2.64	336.072
2.	173	205/BG	30.04.2025	127.300	2.64	336.072
3.	174	209/BG	30.04.2025	127.300	2.64	336.072
4.	175	213/BG	30.04.2025	127.300	2.64	336.072
5.	176	217/BG	30.04.2025	127.300	2.64	336.072
6.	177	221/BG	30.04.2025	127.300	2.64	336.072
7.	212	225/BG	30.04.2025	129.200	2.64	341.088
8.	213	229/BG	30.04.2025	129.200	2.64	341.088
9.	214	233/BG	30.04.2025	129.200	2.64	341.088
10.	215	237/BG	30.04.2025	129.200	2.64	341.088
11.	216	241/BG	30.04.2025	129.200	2.64	341.088
12.	217	245/BG	30.04.2025	129.200	2.64	341.088
13.	218	249/BG	30.04.2025	129.200	2.64	341.088
14.	219	253/BG	30.04.2025	129.200	2.64	341.088
15.	220	257/BG	30.04.2025	129.200	2.64	341.088
16.	221	261/BG	30.04.2025	129.200	2.64	341.088
17.	222	265/BG	30.04.2025	129.200	2.64	341.088
18.	223	269/BG	30.04.2025	129.200	2.64	341.088
19.	224	273/BG	30.04.2025	126.825	2.64	334.818
20.	225	277/BG	30.04.2025	124.712	2.64	329.240
21.	226	281/BG	30.04.2025	124.712	2.64	329.240
22.	227	285/BG	30.04.2025	124.712	2.64	329.240

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23.	228	289/BG	30.04.2025	130.728	2.64	345.122
24.	229	293/BG	30.04.2025	130.000	2.64	343.200
25.	230	297/BG	30.04.2025	130.000	2.64	343.200
26.	231	301/BG	30.04.2025	130.000	2.64	343.200
27.	232	305/BG	30.04.2025	139.000	2.64	366.960
28.	233	309/BG	30.04.2025	139.000	2.64	366.960
29.	234	313/BG	30.04.2025	139.000	2.64	366.960
30.	235	317/BG	30.04.2025	139.000	2.64	366.960
31.	236	321/BG	30.04.2025	139.000	2.64	366.960
32.	237	325/BG	30.04.2025	139.000	2.64	366.960
33.	238	329/BG	30.04.2025	139.000	2.64	366.960
34.	239	333/BG	30.04.2025	139.000	2.64	366.960
35.	240	337/BG	30.04.2025	139.000	2.64	366.960
36.	241	341/BG	30.04.2025	139.000	2.64	366.960
Total				4725.889		12,476.34

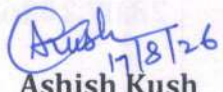
Further, the promoter has submitted an undertaking regarding Fourth Floor Units forming part of proposed Floors Project "M2K Olive Green Floor- Phase II" having temp Id 2291-2026. The promoter states that the building plans for the respective plots have been duly sanctioned by the Competent Authority permitting the construction of S+4 Floors. The promoter undertakes that the 36 Fourth floor units on the above- said 36 Plots, though forming an integral part of the registered project, shall remain withheld from booking, allotment, sale, execution of any agreement to sell and creation of any third-party rights, title or interest whatsoever, until the legal position concerning the Fourth Floor is finally clarified by the Hon'ble Punjab & Haryana High Court and/or the competent Authority.

The application for registration of residential floors was scrutinized and 1st deficiency notice vide notice no. HARERA/GGM/RPIN/1082 dated 28.07.2026 was issued to the promoter with an opportunity of being heard on 03.08.2026.

The promoter has submitted a reply on 04.05.2026 which was scrutinized wherein the promoter has submitted the copy of Public Notice in three newspapers i.e., The Tribune (English), The Hindu (English) and Dainik Bhaskar (Hindi) dated 08.07.2026 for objection till 24.07.2026. No objections have been received w.r.t the above public notice till date.

It has come to the notice that Hon'ble High Court in its **hearing dated 02.04.2026 in the CWP-PIL-212-2024 (O&M)** titled as Sunil Singh V/s State of Haryana and Anr. has restrained the State from going ahead with the 'stilt + 4 Policy" for the residential plots and to stay the effect and operation of the impugned order/ notification for the time being, till the next date of hearing. Pursuant to the above order dated 02.04.2026, the Director, Town & Country Planning, Haryana (DTCP, Haryana) vide Memo no. Misc-2339-L(S+4)/2026/10996-999 dated 03.04.2026, has directed that all approvals in respect of construction of Stilt + 4 floors in residential plots be kept on hold until the embargo imposed by the Hon'ble High Court is lifted. Further, Senior Town Planner (HQ), for DTCP, Haryana vide Endst no. Misc-2339-L(S+4)/2026/11002-06 dated 03.04.2026 has issued directions to all concerned officers and branches that no Layout Plans, Zoning Plans, or Service Plan Estimates be approved with density of 18 persons

	per plot or for construction of Stilt + 4 floors during such intervening period, till the stay on operation of instructions dated 02.07.2024 is removed by Hon'ble High Court. Further, the matter was listed for 08.04.2026 which was adjourned to 17.04.2026. On 17.04.2026, Due to paucity of time, the matter could not be taken up for hearing and fixed for 27.04.2026. On 27.04.2026, the interim order was passed after conducting a spot inspection of a particular area of Gurugram, especially in Sector 28, DLF, Phase-I, Gurugram, 4 CWP-PIL-212-2024 (O&M) and connected matters therefore, we would like to clarify that the order dated 02.04.2026, relates exclusively to the District of Gurugram and not to any other districts of State of Haryana. However, the impugned order dated 02.07.2024, which relates to all the districts of the State of Haryana shall remain subject to the final outcome of this petition. We also clarify that interim orders are always prospective in nature. The matter was listed for 04.05.2026. On 04.05.2026, the matter is fixed for 12.05.2026 for remaining arguments. On 12.05.2026, the matter is fixed for 25.05.2026. On 25.05.2026, the matter is adjourned and to come up on 21.07.2026. On 21.07.2026, the matter is adjourned and to come up on 21.07.2026. On 27.07.2026, the matter is adjourned and to come up on 11.08.2026. However, the order dated 11.08.2026 was not uploaded on the website of the Hon'ble High Court. On 03.08.2026, the matter is adjourned and fixed for 24.08.2026. As per the directions of the Authority, the matter is preponed for 17.08.2026. The Site visit has been done on 14.08.2026 and found that the site is accessible from 6 Karam wide revenue rasta which is connected to 9 Karam wide revenue road which connects to 60 mtr wide road. The status of documents is mentioned below.		
31.	<table border="0"> <tr> <td data-bbox="263 1214 582 1473"> Present compliance status as on 17.08.2026 of deficient documents conveyed through notice dated 28.07.2026. </td><td data-bbox="598 1214 1436 1982"> 1. Deficit fee – Rs 3,54,139/- 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. 3. Online DPI needs to be corrected. 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. 5. Plots on which residential floors has applied for registration needs to be marked on the approved layout plan and needs to be submitted. 6. Affidavit from Managing Director regarding no sale of the plots/residential floors in the project for which the registration is applied needs to be submitted. </td></tr> </table>	Present compliance status as on 17.08.2026 of deficient documents conveyed through notice dated 28.07.2026.	1. Deficit fee – Rs 3,54,139/- 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. 3. Online DPI needs to be corrected. 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. 5. Plots on which residential floors has applied for registration needs to be marked on the approved layout plan and needs to be submitted. 6. Affidavit from Managing Director regarding no sale of the plots/residential floors in the project for which the registration is applied needs to be submitted.
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		7. Pert Chart needs to be submitted. 8. Draft Application form needs to be revised. 9. Draft Allotment letter needs to be revised. 10. Draft Builder Buyer Agreement needs to be revised. 11. Draft Conveyance deed needs to be submitted. 12. Draft Brochure needs to be revised. 13. REP-II needs to be revised. 14. Affidavit regarding no loan on plots on which residential floors are proposed needs to be submitted. 15. Cost of plots needs to be clarified. 16. Affidavit regarding no real estate agent needs to be submitted. 17. KYC of project consultant needs to be submitted. 18. KYC of authorised person (Mr. Mukesh Sharma, Mr. Gaurav Tyagi and Mr. Harish Pandey) to operate bank account needs to be provided. 19. Original bank undertaking needs to be submitted. 20. Background of the promoter needs to be submitted. 21. Project report needs to be submitted. 22. CA Certificate of expenditure incurred and to be incurred needs to be submitted. 23. CA Certificate of REP-1 (A-H) needs to be submitted. 24. CA Certificate of net worth of promoter on latest date, needs to be submitted. 25. Quarterly estimated expenditure, quarterly source of funds and quarterly net cash flow statement needs to be submitted.
32.	Remarks	No reply has been submitted by the promoter.
 Asha Chartered Accountant		 Ashish Kush Planning Executive
Day and Date of hearing		Monday and 17.08.2026
Proceeding recorded by		Ram Niwas
PROCEEDINGS OF THE DAY		
Proceedings dated: 17.08.2026		
Sh. Ashish Kush, Planning Executive and Ms. Asha, Chartered Accountant briefed about the facts of the case. Sh. Vikash Agarwal, Sh. Govind Harbhajanka and Sh. Manoj Kumar are present on behalf of the promoter and states that the reply to the above deficiencies has been submitted today i.e., 17.08.2026.		



It has come to the notice of the Authority that Hon'ble High Court of Punjab and Haryana vide order dated 02.04.2026, in the CWP-PIL-212-2024 (O&M) titled as Sunil Singh V/s State of Haryana and Anr., has restrained the State from going ahead with the 'Stilt + 4 Policy" for the residential plots and to stay the effect and operation of the impugned order/ notification for the time being, till the next date of hearing.

Pursuant to the above order dated 02.04.2026, the Director, Town & Country Planning, Haryana (DTCP, Haryana) vide Memo no. Misc-2339-L(S+4)/2026/10996-999 dated 03.04.2026, has directed that all approvals in respect of construction of Stilt + 4 floors in residential plots be kept on hold until the embargo imposed by the Hon'ble High Court is lifted.

Further, Senior Town Planner (HQ), for DTCP, Haryana vide Endst no. Misc-2339-L(S+4)/2026/11002-06 dated 03.04.2026 has issued directions to all concerned officers and branches that no Layout Plans, Zoning Plans, or Service Plan Estimates be approved with density of 18 persons per plot or for construction of Stilt + 4 floors during such intervening period, till the stay on operation of instructions dated 02.07.2024 is removed by Hon'ble High Court.

Further, the matter was listed for hearing on 08.04.2026 before the Hon'ble High Court and was adjourned to 17.04.2026. On 17.04.2026, due to paucity of time, the matter could not be taken up and was accordingly adjourned to 27.04.2026. On 27.04.2026, after conducting a spot inspection of the particular area of Gurugram, particularly Sector 28, DLF Phase-I, Gurugram, the Hon'ble Court passed an interim order. The Hon'ble Court clarified that the order dated 02.04.2026 relates exclusively to the District of Gurugram and not to any other district of the State of Haryana. However, the impugned order dated 02.07.2024, which pertains to all districts of the State of Haryana, shall remain subject to the final outcome of the petition. It was further clarified that interim orders are prospective in nature. Thereafter, the matter was listed for hearing on 04.05.2026 and subsequently on 12.05.2026 for the remaining arguments. On 25.05.2026, the matter was adjourned to 21.07.2026 and thereafter successively to 27.07.2026, 11.08.2026 and further to 27.08.2026.

The present application dated 10.07.2026 pertains to registration of 144 floors over 36 plots, which is intrinsically linked to the Stilt + 4 Floor Policy, presently under stay in the District of Gurugram. Keeping in view the above including the orders passed by the Hon'ble High Court, the Authority cannot proceed with the present application as such.

The AR further requests the Authority to grant registration of the project comprising Stilt + 3 floors under Section 4 of the Real Estate (Regulation and Development) Act, 2016, and submits a representation in this regard, which is taken on record. The AR further submits that the matter before the Hon'ble High Court is now listed for 27.08.2026 and, in view thereof, requests that the present matter may kindly be adjourned for a period of two weeks.

With regard to the request of the promoter for grant of registration in respect of Stilt + 3 floors, the Authority is of the considered view that such registration cannot be granted in respect of the plots where the building plans have already been sanctioned by the competent authority for construction of Stilt + 4 floors. The registration sought under Section 4 of the Act must correspond with the approvals and sanctioned plans granted by the competent planning authority. Accordingly, the promoter is required to first obtain the requisite revised approval/sanction from the competent authority permitting construction of Stilt + 3 floors, or such other approval as may lawfully enable the promoter to proceed with the project, and



thereafter submit the same before this Authority along with a fresh/appropriate application for registration, in accordance with the provisions of the Act and the rules and regulations made thereunder.

In view of the aforesaid position and the subsisting judicial proceedings concerning the Stilt + 4 Floor Policy, the Authority is not inclined to proceed with the present application at this stage. Accordingly, the request of the AR for adjournment is accepted and the matter is adjourned for 07.09.2026.

(Arun Kumar)
Chairman, HARERA