

Date: 25.09.2025

To,
The Technical Advisor,
U.P. Real Estate Regulatory Authority,
Naveen Bhawan, State Planning Institute,
Kala Kankar House, Old Hyderabad,
Lucknow – 226007

Subject: Submission of Clarification on Deficiencies in Registration of Project
“*The Raas*” (Application ID: ID1708533).

Respected Sir,

With reference to your letter no. 9800/UP-RERA/Project Registration/2025-26 dated 22.09.2025 and discussion in Pre-Authority meeting dated 23.09.2025, we most respectfully submit our clarifications on the deficiencies pointed out in respect of our above-mentioned project application, as under:

1. **Regarding Point No. 1:** It has been observed that in the uploaded *Sazra*, the Chak Road and *Nali* traverse the plots at several points, and that the railway platform, signboard, and light pole fall within the plot boundaries.

In this regard, it is submitted that:

- a) A superimposed plan on the revenue map, has been uploaded clearly demonstrating the Chak Road and *Nali* does not traverse the plots in the project and internal roads have been planned in that place. The original profile of Chak Road/*Nali* has not been altered.
- b) Further, the railway platform, signboard, and light pole are situated outside the project area applied for registration, hence they do not form part of the proposed project.

2. **Regarding Point No. 2:** It has been observed that commercial unit details have not been uploaded in the portal inventory.

In this regard, we submit that:

- No application has been made for registration of commercial properties proposed in the approved layout plan of the project. A separate application shall be filed for such commercial units **after the detailed building plans are duly sanctioned by MVDA.**

IMPACTUM LANDS PRIVATE LIMITED

Regd. Off: 701 Unit, 7th Floor, 1 Aerocity Building, NIBR Compound, Mohili Village, Sakinaka, Safed Pool, Mumbai 400072.

CIN No.: U70109MH2021PTC373746 | **GST No.:** 27AAGCI4607Q1Z2 | **compliance@hoabi.in** | **022-71519000**


- As per **Section 3, Explanation, RERA Act, 2016** — “For the purpose of this section, where the real estate project is to be developed in phases, every such phase shall be considered a standalone real estate project, and the promoter shall obtain registration under this Act for each phase separately.”
 - The current application is being submitted for plotting development scheme which is in continuation and the commercial phase, GH phase and other properties of layout of the project shall be registered independently once the phasing map is sanctioned by MVDA.
3. **Regarding Point No. 3:** It has been observed that multiple landowners are reflected in the *Khatauni*, however they have not been shown as promoters.

In this regard, we submit that:

- The Company has already purchased the entire land falling within the project area and is in full possession thereof. The *Khataunis* and mutation orders of all relevant *Khasras* have been uploaded on the portal, except *Khasra No. 69* (Area 6,838 sq. mtrs.) for which mutation application has been filed before Sadar Tehsil, Mathura (Case No. T202501500103843). We undertake to upload the updated *Khatauni* immediately upon issuance of the mutation order. A copy of the case file is annexed for your kind reference.
- Further, as directed during the hearing held on 23.09.2025, we are submitting herewith the details of all the *Khasra* owners concerned, for your kind consideration.

In view of the above submissions and supporting documents, we humbly request your good office to consider the same and kindly grant registration of the project “**The Raas**” under the provisions of the Real Estate (Regulation and Development) Act, 2016.

Yours faithfully,
For Impactum Lands Private Limited


Authorised Signatory
Name: Ramanandanam Pandey

Date: 25.09.2025

Place: Mathura

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Ownership Chart

Sr. No.	Gata No.	Total Land Area In Hect.	Land In Hect.Purchaed By Impactum Lands Pvt. Ltd.	Balance Land Area In Hect.	Landowner Name for Balance Area (Beyond project Area)
1	63	6.904	4.8627	2.0413	Padam Singh
2					Ayodhya
3					Raghubeer
4					Pitam Chand
5					Dal Chand
6					Sunder Lal
7					Purushottam
8					Gaurav Gopal
9					Murari Lal
10					Shyam Singh
11					Bhagat Singh
12					Chaya Mittal
13	70	3.426	2.1528	1.2732	Ashok Kumar
14					Girdhari
15					Rajesh Kumar
16					Ramveer
17					Dropa
18					Devo
19					Brijesh
20					Shakuntala
21					Rajveer Dixit
22					Sushila Devi
23					Satya Prakash
24					Harish Chand
25	Raja Ram				
26	89	6.734	6.6075	0.1265	Shakuntala Devi
27	91	1.153	0.577	0.576	Damodar
28					Bal Krishna
29					Bal Mukund
30					Rameshwar
31					Shaym Sunder
32					Lschho

33	93/1ka	4.524	0.5945	3.9295	Devendra
34					Ram Babu
35					Shiv Charan
36					Kamlesh
37	66	1.898	1.898	0	Impactum Lands Pvt. Ltd.
38	66ka	0.416	0.416	0	Impactum Lands Pvt. Ltd.
39	67	0.555	0.555	0	Impactum Lands Pvt. Ltd.
40	68	2.116	2.116	0	Impactum Lands Pvt. Ltd.
41	69	1.914	1.914	0	Impactum Lands Pvt. Ltd.
42	87/1	0.34	0.34	0	Impactum Lands Pvt. Ltd.
43	87/2	0.34	0.34	0	Impactum Lands Pvt. Ltd.
44	90/1	0.174	0.174	0	Impactum Lands Pvt. Ltd.
45	90/2	0.174	0.174	0	Impactum Lands Pvt. Ltd.
46	786	0.53	0.53	0	Impactum Lands Pvt. Ltd.
47	795	1.342	1.342	0	Impactum Lands Pvt. Ltd.
Total		32.540	24.594	7.947	

KHASRA DETAILS

S. No.	Khasra No.	Khatauni Area	Purchased Area	Purchaser Name	Remarks for Khatauni	Remarks for mutation orders
1	63	69040	48633	Impactum Lands Pvt. Ltd.	Name updated but area not showing in Khatauni	Order available
2	66	18980	18980	Impactum Lands Pvt. Ltd.	ok	Not required
3	66 Ka	4160	4160	Impactum Lands Pvt. Ltd.	ok	Not required
4	67	5550	5550	Impactum Lands Pvt. Ltd.	Name updated but area not showing in Khatauni	Order available
5	68	21160	21160	Impactum Lands Pvt. Ltd.	Name updated but area not showing in Khatauni	Order available
6	69	19140	19140	Impactum Lands Pvt. Ltd.	6838 (6074+764) area not showing under promoter	Order available for 13066 sq mtrs and Application for mutation for remaining area filed.
7	70 Min	34260	21528	Impactum Lands Pvt. Ltd.	Name updated but area not showing in Khatauni	Order available
8	87/1	3400	3400	Impactum Lands Pvt. Ltd.	ok	Not required
9	87/2	3400	3400	Impactum Lands Pvt. Ltd.	ok	Not required
10	89	67340	66075	Impactum Lands Pvt. Ltd.	Name updated but area not showing in Khatauni	Order available
11	90/1 Min	1740	1740	Impactum Lands Pvt. Ltd.	ok	Not required
12	90/2 Min	1740	1740	Impactum Lands Pvt. Ltd.	ok	Not required
13	91	11530	5770	Impactum Lands Pvt. Ltd.	ok	Not required
14	93/1 Ka	45240	5945	Impactum Lands Pvt. Ltd.	2260 (1070+1190) area not showing under promoter	Order available
15	786	5300	5300	Impactum Lands Pvt. Ltd.	Not updated	Order available
16	795	13420	13420	Impactum Lands Pvt. Ltd.	ok	Order available
	Total	325400	245941			

CERTIFIED TRUE COPY OF RESOLUTION PASSED BY THE BOARD OF DIRECTORS OF IMPACTUM LANDS PRIVATE LIMITED ON 18TH SEPTEMBER 2024.

“RESOLVED THAT in supersession of the earlier resolutions passed by the Board of Directors on 21st July 2024, the consent of the Board be and is hereby accorded to authorize, severally, **Mr. Ashwinder Matharu and Mr. Rakesh Gupta, Directors of the Company along with Mr. Jignesh Gosalia, Mr. Mayank Shah, Mr. Ramanandanam Pandey and Mr. Harsh Aurangabadwalla** as Authorized Signatory on behalf of the Company to:

a) To enter into any Memorandum of understanding, Development Agreement, Joint Development Agreement, Power of Attorney, Agreement for Sale, Sale Deed, Deed of Conveyance, Consent Deed, Deed of Confirmation, Deed of Cancellation, Deed of Rectification, Deed for Extra Possession, Exchange Deed, Escrow Agreement, Agreement for Promotion, Deed of Settlement/s, Advertisement, Possession Letter and such documents pertaining to acquisition of the property situate, lying and being at **Village Julhendi and Village Konhai , Tehsil – Sadar , Janpad Mathura admeasuring approximately 100 Acres (“said Land”)** present or in future or any other property in the state of Uttar Pradesh to be undertaken by Company;

b) To enter into Term Sheet, Letter of Intent, Letter of Understanding and such other documents required for initialization of the deal and negotiate with landowners, their advocates, and consultants for the same;

c) To execute and register, present for registration any and all documents pertaining to the said Land and / or Projects on the said Land including other documents not specifically stated hereinabove in point no. (a) and (b) and to do all acts, deeds, actions in relation to acquisition, development, disposition of the said Land/ any part thereof as mentioned hereinabove;

d) To apply to the Collector (District Magistrate), Town Planning Authority, Mathura Vrindavan Development Authority, Sub-Divisional Magistrate, Additional District Magistrate , Tahsildar, Revenue Officer, Talathi, MD/Chief Engineer / Executive Engineer of UP Power Corporation Limited, Commissioner / Additional commissioner of Nagar Nigam, Divisional commissioner, Police department : SSP/SP/& all police station heads of Mathura.UP Nivesh Sarathi, Mathura, Forest Department, Chief Engineer / Executive Engineer of UP Housing Board (UP Awas Vikas) or any such Board, Irrigation, and Registrar and sub registrar, and executive engineer, Badh Khand (flood management authority), District Disaster Management Authority, Mathura and all other government offices, and authorities, for seeking permissions, sanctions, licenses, approvals, No Objection Certificates (NOC), including but not limited to Non-Agricultural Permission in respect of either of or all of the land parcels mentioned hereinabove for the purpose of development of the Project and to do all actions to effectuate complete development of the Project;

e) To apply for revision/ amendment of Non-Agricultural permission, Taluka Inspector of Land Records (T.I.L.R), any other government authorities, revenue authorities, local authorities, local municipal authorities for seeking permissions, sanctions licenses etc;

f) To carry out such other things and execute, register, notarize such other documents, applications, NOCs as may be required for the acquisition of the said Land / any part thereof or Projects undertaken by the Company;

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- g) To sign all documents including Agreement for Sale, Deed of Sale, Deed of Conveyance, Deed of Settlements, Deed of Confirmation, Deed of Cancellation, Deed of Rectification, Escrow Agreement, Possession Letter and such other documents to be executed and registered with the customers in respect of the Project;
- h) To appear before the Uttar Pradesh Real Estate Regulatory Authority (UP RERA), Uttar Pradesh RERA Appellate Tribunal, and other authorities and to sign, verify and execute all documents including complaints, suits, petitions, replies, rejoinders, affidavits, declarations and such other documents in Uttar Pradesh as well as in any other states to safeguard the interest of the Company;
- i) To sign, verify and execute all documents including complaints, suits, petitions, replies, rejoinders, affidavits, declarations, vakalatnamas and such other documents to safeguard the interest of the Company;
- j) To sub delegate all or any powers hereby conferred to other Officers/Officers of the Company, external consultants, professionals, lawyers etc. as he may think fit and proper in the interest of the Company;
- k) To do and execute such other things as may be required in respect of the aforementioned properties from time to time;

RESOLVED FURTHER THAT the Directors of the Company be and are hereby severally authorized to certify the resolution and issue the same to all concerned parties.”

//Certified True Copy//

For and on behalf of

IMPACTUM LANDS PRIVATE LIMITED

RAKESH
RAMDAS
GUPTA

Digitally signed by
RAKESH RAMDAS
GUPTA
Date: 2024.09.19
12:17:44 +05'30'

Rakesh Gupta
Director
DIN: 10241667

Date: 19/09/2024
Place: Mumbai

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