



SAPPHIRE INFRAVENTURES (P) LIMITED

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Date: 01.04.2026

To,
The Secretary,
Uttar Pradesh Real Estate Regulatory Authority,
Lucknow, Uttar Pradesh

Subject: Submission of clarification and documents regarding common approach road for Project "*Sapphire Royale Extension*" (Application ID: **ID1925728**)

This is with reference to the requirement for uploading of land documents pertaining to the ownership of the common approach road for registration of the project "*Sapphire Royale Extension*". In this regard, we respectfully submit the following:

1. Project Boundary and Scope

The project under registration, namely "*Sapphire Royale Extension*", comprises a total land area of **7695 sq. mtrs.**, as per the layout plan duly sanctioned by Lucknow Development Authority vide Permit No. Plotted Resi development / Plotted Housing/14230/LDA/LD/24-25/2511/11122024 dated 17-01-2025. The said project is **independent and distinct** from the already developed township project "*Sapphire Royale*", within whose layout the subject common/approach road is situated.

2. Status of the Common / Approach Road

- The **18 mtrs. wide common road**, as reflected in the approved layout, **does not form part of the project land admeasuring 7695 sq. mtrs.** under the present registration.
- The said road is situated within the Township of "*Sapphire Royale*", duly approved by Lucknow Development Authority and also registered with RERA vide registration no. **UPRERAPRJ17975**. Furthermore, the **Completion Certificate (CC)** has already been obtained and duly uploaded on the RERA portal.

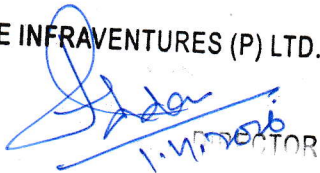
Accordingly, the said road is **external to the present project boundary** and forms part of the infrastructure of an already approved and completed township.

3. Ownership of Common Road Land (Submitted for Clarification)

Without prejudice to the above position, and in the interest of complete disclosure and transparency, we have uploaded the ownership documents pertaining to the land comprising the common road. The details of such land are summarized below:

Sr. No.	Khasra No.	Area (Hectare)	Document No.	Date	Ownership
1	797	0.139	6184	23-Oct-10	Sapphire Developers
2	798	0.1518	7255	15-Dec-10	Sapphire Sahkari Grih Nirmaan Samiti Ltd.
3	798	0.405	689	29-Jan-11	Sapphire Sahkari Grih Nirmaan Samiti Ltd.
4	810	3.587	6267	05-Aug-11	Sapphire Developers

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5	822	0.1117	2129	07-Feb-14	Sapphire Infraventures Pvt. Ltd.
6	822	0.55584	7192	12-May-14	Sapphire Infraventures Pvt. Ltd.
7	822	0.2234	17612	28-Oct-14	Sapphire Infraventures Pvt. Ltd.
8	822	0.44675	21057	15-Dec-14	Sapphire Developers
9.	822	0.44675	13770	26-Aug-16	Sapphire Developers

It is submitted that a **Consortium Agreement bearing registration no. 187 dated 05.09.2019** has already been executed and uploaded on the RERA portal, wherein **Sapphire Infraventures Private Limited** is the *Lead Member*, along with other landowners as consortium members, for the development and construction of the township project "*Sapphire Royale*".

It is further clarified that the common/approach road is not a separately demarcated land parcel but is carved out of and forms an integral part of the land comprised in the aforesaid Khasra Nos., as per the approved layout plan sanctioned by Lucknow Development Authority and duly registered under RERA.

It is pertinent to submit that "*Sapphire Royale*" township has been developed under the said consortium arrangement, wherein Sapphire Infraventures Private Limited (Lead Member) and the other consortium members, namely Sapphire Sahkari Grih Nirmaan Samiti Ltd., Sapphire Developers, Ms. Areeba Khan, Ms. Salma Khatoon, Mr. Ahmad Kamal Khan were collectively part of the development framework of the township. **Accordingly, the land comprising the said common/approach road continues to form part of the larger "Sapphire Royale Township" and does not fall within the scope of the present project land admeasuring 7695 sq. mtrs. under registration, being "Sapphire Royale Extension".**

4. Legal Position under RERA

As per the provisions of **Section 4(2)(I)(D) of the Real Estate (Regulation and Development) Act, 2016**, the promoter is required to submit documents relating to the land proposed to be developed under the project.

In the present case the approach road land is **not part of the project land**, and the same forms part of a **separately approved and completed township project**,

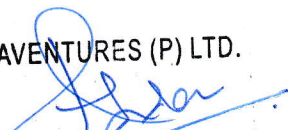
Accordingly, **submission of ownership documents for such land is not mandatorily required** under the Act for the present registration. However, the same has been **submitted voluntarily for abundant caution and clarity**.

5. Consortium Arrangement – Clarification

It is further submitted that the project land admeasuring **7695 sq. mtrs.** is owned by **only three landowners**, namely Sapphire Infraventures Private Limited (Lead Member), Ms. Salma Khatoon and Ms. Areeba Khan. Accordingly, a **Consortium Agreement has been executed among the above three entities**, being the **actual landowners of the project under registration**. It is pertinent to mention that earlier, a consortium agreement including additional parties (pertaining to township/common areas) had been uploaded. However, during the **Pre-Authority Meeting**, the Hon'ble Authority directed that **only those landowners whose land forms part of the project area under registration should be included in the consortium**.

In compliance with the said direction a **revised Consortium Agreement** has been executed vide Agreement No. 36 dated 26.03.2026 and the same has been **duly uploaded on the RERA portal**.

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Thus, the consortium now **accurately reflects the ownership structure of the project land**, in full compliance with regulatory requirements.

6. Access Clarification

The project derives access through the internal road network of "*Sapphire Royale Township*", which is already developed, legally approved and functionally operational. This constitutes **access through existing infrastructure** and **does not imply inclusion of such land within the project boundary**.

Conclusion

In view of the above:

- The common/approach road is not part of the project land under registration,
- The same belongs to a separately approved and completed township,
- Ownership documents of land details part of which consists of such road have already been uploaded for clarity, and
- The consortium agreement has been revised strictly in line with project land ownership, as per the directions of the Hon'ble Authority.

Accordingly, the objection may kindly be **treated as fully complied with**.

For Sapphire Infraventures Pvt. Ltd.

SAPPHIRE INFRAVENTURES (P) LTD.

Authorized Signatory

DIRECTOR

Name: Ahmad Kamal Khan

Designation: Director