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**IN THE HIGH COURT OF DELHI AT NEW DELHI**

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W.P.(C) 1319/2026 & CM APPL. 6437/2026

SANDEEP & ORS.

.....Petitioners

Through: Mr. Rahul Sharma, Mr. Surender and  
Mr. Yash Tokas, Advocates.

versus

GOVT OF NCT OF DELHI & ORS.

.....Respondents

Through: Mr. Sanjay Kumar Pathak, SC with  
Mr. Sunil Kumar Jha and Mr. M. S.  
Akhtar, Advocates for R-1/ LAC.

**CORAM:**

**HON'BLE MR. JUSTICE SANJEEV NARULA**

**ORDER**

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**25.02.2026**

1. Petitioners No. 1 and 2 are the recorded owners of agricultural land comprised in Khewat No. 207, Khatauni No. 167 Min., bearing Khasra No. 17/7 (4-16), situated in the revenue estate of Village Ladpur, Delhi-110081. Petitioner No. 3 is the purchaser of the said land.
2. Petitioners No. 1 and 2 executed a Sale Deed dated 06<sup>th</sup> May, 2025 in favour of Petitioner No. 3 in respect of land measuring 4 Bigha 16 Biswa. The said Sale Deed was presented before Respondent No. 2 (Sub-Registrar VI-D) for registration.
3. At the time of presentation, the Petitioners were directed to obtain NOC/Land Status Report (“LSR”) from the Revenue Department. An application was accordingly submitted on 07<sup>th</sup> May, 2025. However, Respondent No. 2 issued a Deficiency Memo dated 14<sup>th</sup> May, 2025 stating that the land status report/NOC had not been provided.
4. The application for NOC/LSR was subsequently reflected on the online portal as “*Not Recommended*”, with the reason recorded as: “*Village*



*ladpur notified under consolidation vide notification dated 10.09.1993 and consolidation proceedings not completed, Hence Not Recommended”.*

5. It is noted that Village Ladpur stands urbanized *vide* notification dated 16<sup>th</sup> May, 2017 issued under Section 507 of the Delhi Municipal Corporation Act, 1957.

6. Counsel for the Respondents submits that in view of the pendency of consolidation proceedings, the Sub-Registrar cannot proceed with registration without requisite sanction.

7. Insofar as insistence on sanction/NOC on account of pending consolidation proceedings is concerned, this Court in ***Okaya Infocom Pvt. Ltd. & Anr. v. Govt. of NCT of Delhi & Anr.***<sup>1</sup>, while dealing with the registration of sale deeds, held that having regard to the prolonged nature of consolidation proceedings, registration of such documents cannot be indefinitely withheld solely on the ground of non-availability of an NOC. The Sub-Registrar was directed to proceed in accordance with law, without insisting upon any sanction, approval, or NOC linked exclusively to consolidation proceedings.

8. The aforesaid legal position has been reiterated in subsequent decisions, including in ***Jeevantika Organic Farming LLP v. Govt. of NCT of Delhi & Ors.***<sup>2</sup>, wherein, while taking note of the stand of the Government, this Court balanced equities by requiring the intending purchaser(s) therein to furnish an undertaking. The underlying principle, namely that registration cannot be stalled indefinitely on account of pending consolidation proceedings, is equally applicable to the present case.

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<sup>1</sup> In *W.P.(C) 12122/2021*, decided on 10<sup>th</sup> November, 2023.

<sup>2</sup> In *W.P. (C) 12083/2025* & other connected matters decided on 12<sup>th</sup> August, 2025.



9. In view of the aforesaid legal position, and having regard to the facts of the present case, this Court is of the opinion that the writ petition can be disposed of by issuing directions in similar terms.

10. Accordingly, it is directed as under:

(i) The Petitioners shall file an undertaking by way of an affidavit stating that the factum of this order shall be disclosed in the event of any further transaction relating to the subject land, prior to the conclusion of the consolidation proceedings. Let the said undertaking be filed within a period of two weeks from today. Upon filing of such an undertaking, the Petitioners shall remain bound thereby.

(ii) Any breach of the aforesaid undertaking shall entail consequences in accordance with law. The undertaking shall also form part of the registered Sale Deed so as to put any subsequent transferee to notice.

(iii) Subject to verification of the land acquisition status by the competent authority, and in line with the decisions in ***Okaya Infocom Pvt. Ltd.*** and ***Jeevantika Organic Farming LLP***, it is directed that the registration of the Sale Deed shall not be refused solely on the ground of pendency of consolidation proceedings or non-availability of any sanction/NOC in that regard, and shall be processed further in accordance with law.

(iv) It is clarified that the registration shall be without prejudice to the pending consolidation proceedings and shall remain subject to the rights, claims, and contentions of third parties, if any.

11. With the following directions, the petition is disposed of, along with the pending application.

**SANJEEV NARULA, J**

**FEBRUARY 25, 2026/hc**