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

+ **W.P.(C) 2154/2026, CM APPL. 10485/2026**

SMT SAVITA & ANR.

.....Petitioners

Through: Mr. Rahul Sharma, Mr. Surender and
Mr. Mukesh Sharma, Advocates.

versus

GOVT OF NCT OF DELHI & ORS.

.....Respondents

Through: Mr. Sanjay Kumar Pathak, SC with
Mr. Sunil Kumar Jha, Mr. M.S.
Akhtar and Mr. Joohu Kumari,
Advocates for R-1.
Mr. Lalitaksh Joshi and Mr. Suman
Gupta, Advocates for GNCTD.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

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16.02.2026

1. Petitioner No. 1 is a co-owner in possession of ½ share in agricultural land comprised in Khasra Nos. 93/9(4-16), 12/1(0-15) and 12/2(1-11), situated in the revenue estate of Village Ladpur, Delhi-110081. She executed a Sale Deed dated 24th August, 2023, in favour of Petitioner No. 2 in respect of the aforesaid land. The document was presented before the Sub-Registrar (VI-D) for registration on the same date.
2. Upon presentation of the document, the Sub-Registrar issued a deficiency memorandum dated 24th August, 2023, stating that the Sale Deed was not accompanied by the Land Status Report/No Objection Certificate



(“NOC”) in respect of agricultural land and, therefore, could not be processed further for registration.

3. In order to cure the aforesaid deficiency, the Petitioners applied online on 17th November, 2023 for issuance of a Land Status Report/NOC. The said application was, however, rejected on the portal with the remark “*pending due to non-receipt of complete documents in hard copy...apply a fresh*”. As a consequence of the NOC not being issued, the Sub-Registrar has continued to withhold registration of the Sale Deed on the ground that the mandatory Land Status Report/NOC has not been furnished.

4. According to the Petitioners, the insistence on production of an NOC, and the resulting non-registration of the Sale Deed, is essentially founded on the stand of the authorities that the land falls in a village where consolidation proceedings are pending. The Petitioners submit that insistence on an NOC solely on account of consolidation proceedings is contrary to the circular dated 14th August, 2025, issued by the office of the Divisional Commissioner (Land Branch, Revenue Department), and the settled position in law.

5. Insofar as the insistence on an NOC founded on the pendency of consolidation proceedings is concerned, this Court in ***Okaya Infocom Pvt. Ltd. & Anr. v. Govt. of NCT of Delhi & Anr.***¹, while dealing with the registration of a sale deed, 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 a 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.

6. The aforesaid legal position was reiterated by this Court in ***Jeevantika Organic Farming LLP v. Govt. of NCT of Delhi & Ors.***², 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.

7. 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.

8. 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 said undertaking shall also form part of the Sale Deed, so as to put any subsequent transferee to notice of the subsisting undertaking.

(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

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

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



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 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.

9. With the following directions, the petition is disposed of along with pending application(s), if any.

SANJEEV NARULA, J

FEBRUARY 16, 2026

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