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

+ **W.P.(C) 2619/2026 & CM APPL. 12745/2026 (Exemption)**

KRISHAN KUMAR

.....Petitioner

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

versus

GOVT OF NCT OF DELHI & ORS.

.....Respondents

Through: Mr. Lalitaksh Joshi, Ms. Minu
Kumari, Advocates for GNCTD.
Mr. Sanjay Kumar Pathak, Standing
Counsel with Mrs. K. Kaomudi Kiran
Pathak, Mr. Sunil Kumar Jha, Mr.
M.S. Akhtar, Ms. Joohu Kumari,
Advocates for LAC.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

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25.02.2026

1. The Petitioner is the purchaser of 1/72 share in agricultural land measuring 95 Bigha 12 Biswa comprised in Khasra Nos. 39//13/1 (4-12), 17/1 (2-08), 9 (4-09), 8/1 (4-12), 31//19 (4-16), 20 (4-16), 12 (4-16), 33//22/3 (0-11), 23/1 (3-16), 39//12 (6-02), 18/1 (3-12), 18/2 (1-00), 23/1 (1-14), 23/2 (0-12), 43//3 min (4-00), 52/12 (3-17), 13/1 (2-00), 13/2 (2-16), 17 (4-16), 18/1 (2-16), 18/2 (2-00), 19 (2-00), 23 (3-14), 24 (4-16), 73//11/3 (2-08), 12 (4-16), 20/1 (4-05) and 21/1 (3-12), situated in the revenue estate of Village Ladpur, Delhi – 110081.
2. Respondent No. 4 (vendor), being one of the legal heirs of late Mr.



Jeet Ram, executed a Sale Deed dated 03rd June, 2025, in favour of the Petitioner for the aforesaid share. The Sale Deed was presented for registration before Respondent No. 2 (Sub-Registrar VI-D).

3. At the time of presentation, the Petitioner was directed to obtain NOC/Land Status Report (“*LSR*”) from Respondents No. 1 and 3. The Petitioner accordingly applied for NOC/LSR on 03rd June, 2025. However, a Deficiency Memo dated 09th June, 2025 was issued by the Sub-Registrar requiring production of the said NOC/LSR.

4. The application for NOC/LSR was subsequently reflected on the portal as “*Not Recommended*”, with the reason recorded as: “*Village Ladpur notified under Consolidation vide Notification dated 10.09.1993 and Consolidation Proceeding Not Completed. Hence, Not Recommended*”.

5. Counsel for the Respondents submits that since consolidation proceedings are pending in Village Ladpur, the Sub-Registrar cannot proceed with registration without requisite sanction.

6. 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.***¹, 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.

7. The aforesaid legal position has been reiterated in subsequent



decisions, including 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.

8. 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.

9. Accordingly, it is directed as under:

(i) The Petitioner 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 Petitioner 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 NOC in that regard, 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.



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.

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

SANJEEV NARULA, J

FEBRUARY 25, 2026/ab