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

+ **W.P.(C) 4416/2026**

DREAM BATH STUDIO PVT LTD

.....Petitioner

Through: Mr. Anil Dagar, Advocate.

versus

GOVT OF NCT OF DELHI & ORS.

.....Respondents

Through: Ms. Vaishali Gupta, Panel Counsel
(Civil) for GNCTD with Mr.
Anubhav Gupta, Advocate.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

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06.04.2026

1. The Petitioner claims to be the purchaser of agricultural land admeasuring 12 Bigha and 11 Biswas comprised in Khasra No. 42//6/3 (0-01), 42//15/1 (2-18), 43//11 (4-16) & 43//12 (4-16), situated in the revenue estate of Village Ladpur, Delhi.
2. It is stated that a Sale Deed dated 07th January, 2026 was executed in favour of the Petitioner and presented before Respondent No. 2 (E-Sub Registrar VI-D). However, the said document has not been processed further and remains pending for registration.
3. The reason cited for non-processing of the Sale Deed is the absence of an NOC from Respondent No. 3 on account of pendency of consolidation proceedings in the concerned village. Despite repeated visits and follow-up by the Petitioner, neither has the document been registered nor has any



formal order of refusal been communicated.

4. Counsel for the Respondents submits that since the land is under consolidation proceedings, the concerned Sub-Registrar cannot proceed with registration without requisite permission from the competent authority.

5. 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 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.

6. 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.

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 affidavit/undertaking already placed on record by the Petitioner,

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.



in terms of the judgment of this Court in ***Okaya Infocom Pvt. Ltd.***, is taken on record and accepted. The Petitioner shall remain bound by the same.

(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 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 the pending application.

SANJEEV NARULA, J

APRIL 6, 2026/ab