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

+ **W.P.(C) 4560/2026, CM APPL. 22230/2026**

SARLA & ANR.

.....Petitioners

Through: Mr. V.P. Dabas, Mr. Bharat Thakur,
Mr. Vineet Dabas, Mr. Raj Kumar
Dabas and Ms. Kirandeep Kaur,
Advocates.

versus

GNCT OF DELHI & ORS.

.....Respondents

Through: Ms. Avni Singh, Panel Counsel for
GNCTD with Mr. Vaibhav Sharma,
Advocate.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

07.04.2026

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1. The Petitioner No. 1 is the purchaser of land measuring 471/840 share (approximately 2 bighas 7 biswas) out of agricultural land measuring 42 bighas comprised in Khasra Nos. 46//1/2 (3-12), 46//10 (4-16), 47//5 (4-16), 65//14 (4-16), 16 (4-16), 17 (4-16), 18 (4-16), 93//16 (4-16) and 17 (4-16), situated in the revenue estate of Village Ladpur, Delhi – 110081.
2. Respondent No. 4 (vendor), being the recorded co-owner, executed a Sale Deed dated 25th October, 2023 in favour of Petitioner No. 1 for the aforesaid share. The said Sale Deed, along with a Special Power of Attorney dated 25th October, 2023 executed in favour of Petitioner No. 2 for purposes of mutation, was presented for registration before Respondent No. 3 (Sub-Registrar VI-D).
3. At the time of presentation, the Petitioners were required to furnish NOC in respect of the subject land. A Deficiency Memo dated 25th October, 2023 was accordingly issued by Respondent No. 3, recording that NOC for



agricultural land was required and calling upon the Petitioners to remove the deficiency within the stipulated period for further processing of the documents.

4. The Petitioners contend that the insistence on NOC is untenable, particularly when no such NOC is being issued in respect of lands situated in Village Ladpur on account of pendency of consolidation proceedings.

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 has 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.

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.



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 affidavit/undertaking already placed on record by the Petitioners, in terms of the judgment of this Court in ***Okaya Infocom Pvt. Ltd.***, is taken on record and accepted. The Petitioners 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 dated 25th October, 2023 and the Special Power of Attorney of even date 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.

10. The petition is disposed of in the above terms, along with pending application(s), if any.

SANJEEV NARULA, J

APRIL 7, 2026

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