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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ **W.P.(C) 4677/2026 & CM APPL. 22828/2026**
SURENDER KUMAR AND ANRPetitioners

Through: Mr. Rajesh Yadav, Senior Advocate
with Mr. S.S. Rana, Ms. Ruchira
Arora, Mr. P.S. Anroop and Mr.
Gopal Rana, Advocates.

versus

THE GOVT OF NCT OF DELHI AND ANRRespondents

Through: Mr. Sunil Kumar, Advocate.

CORAM:
HON'BLE MR. JUSTICE SANJEEV NARULA

% **ORDER**
09.04.2026

1. Petitioner No. 2 is stated to be a co-owner/co-sharer in possession of agricultural land situated in the revenue estate of village Ladpur, Delhi, holding specified undivided shares therein, comprising: (i) 2/39th share in land measuring 01 Bigha 19 Biswas, forming part of Khasra Nos. 59//16 min (0-17), 23 min (0-05), 24 min (0-02), 63//11 min (0-13) and 20 min (0-02), in Khewat No. 12; (ii) 23/46th share in land measuring 23 Bighas 03 Biswas, comprising Khasra Nos. 93//6/1 (4-10), 14/2 (4-12), 15/2 (4-12), 24 (4-16), 25/1 (2-06), 94//10/1 (0-17), 11/1 (0-19) and 20 (0-11), in Khewat No. 9; (iii) 72/1449th share in land measuring 72 Bighas 09 Biswas, comprising Khasra Nos. 30//23 (4-16), 35//2 (4-16), 59//16 min (3-19), 23



min (4-11), 24 min (4-14), 25 (4-16), 60//4 (4-16), 5 (4-16), 7 (4-16), 63//10/2 (1-04), 11 min (4-03), 20 min (4-14), 21 (4-16), 34//12/2 (3-12), 13 (4-16), 17/1 (2-08) and 18 (4-16), in Khewat No. 8; and (iv) 19/384th share in land measuring 19 Bighas 04 Biswas, comprising Khasra Nos. 30//17 (4-16), 18 (4-16), 19 (4-16) and 22 (4-16), in Khewat No. 10. It is stated that the said shares have been agreed to be transferred by Petitioner No. 2 in favour of Petitioner No. 1, and the Petitioners now seek to effect such transfer.

2. It is stated that the said Sale Deed was presented before Respondent No. 1 for registration on 29th August, 2024, and a receipt/slip acknowledging presentation of the document was issued on the same day. Thereafter, Respondent No. 1 issued a Deficiency Memorandum dated 30th November, 2024, requiring the Petitioners to furnish a No Objection Certificate (“NOC”) /Land Status Report (“LSR”) from the competent authority as a precondition for registration of the Sale Deed.

3. The Petitioners state that upon approaching Respondent No. 2 for issuance of such NOC/LSR, they were informed that no such certificate is presently being issued in respect of lands situated in village Ladpur *inter alia* on account of the pendency of consolidation proceedings.

4. It is submitted that although consolidation proceedings were notified in the year 1993, the same have not progressed, and no consolidation scheme has been framed till date. Thus, it is contended that, the Petitioners are placed in a situation where registration is withheld for want of NOC/LSR, while no mechanism exists to obtain such certificate. Aggrieved, the Petitioners have invoked the writ jurisdiction of this Court.

5. Insofar as insistence on NOC/LSR 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 intending purchaser i.e., Petitioner No. 1, in terms of the judgment of this Court in ***Okaya Infocom Pvt. Ltd.***, is taken on record and accepted. He 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

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.



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/LSR 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 9, 2026

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