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

+ **W.P.(C) 4704/2026 & CM APPL. 23016/2026**

RAVINDER SINGH AND ANR

.....Petitioners

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

versus

GOVT OF NCT OF DELHI

.....Respondent

Through: Mr. Sunil Kumar, Advocate.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

09.04.2026

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1. The Petitioners are the intending purchasers of 1/2th undivided share, admeasuring 1 Bigha 1 Biswa, comprised in Khasra No. 154//472 (min), situated in the revenue estate of Village Pooth Khurd, Delhi.
2. The Petitioners have purchased the aforesaid land by way of a Sale Deed dated 1st December, 2025. The said Sale Deed was presented before the concerned Sub-Registrar for registration on the same date, and a receipt/slip acknowledging such presentation was issued.
3. The record indicates that despite presentation of the Sale Deed, the same has not been registered till date. The Petitioners have approached the Respondent authorities; however, no decision, either registering the document or formally refusing the same, has been communicated. Constrained by the same, the Petitioners have invoked the writ jurisdiction



of this Court.

4. Counsel for the Respondents submits that since the land is under consolidation proceedings, registration of the Sale Deed would require a Land Status Report (“*LSR*”)/No Objection Certificate (“*NOC*”) from the competent authority.

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:

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.



- (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 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.

SANJEEV NARULA, J

APRIL 9, 2026

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