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

% **Date of Decision: 01st July, 2026**

+ **W.P.(C) 5178/2026 & CM APPL. 39771/2026**

SMT. ANUPMA BANSAL

.....Petitioner

Through: **Mr. V. P. Rana, Advocate**
(M:9811165700)

versus

GOVT. OF NCT OF DELHI & ANR.

.....Respondents

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

CORAM:

HON'BLE MS. JUSTICE MINI PUSHKARNA

MINI PUSHKARNA, J (ORAL):

CM APPL. 39771/2026

1. The present application has been filed on behalf of the petitioner under Section 151 of the Code of Civil Procedure, 1908 ("CPC") seeking direction to respondent no. 2 to register the sale deed dated 21st January, 2026, in accordance with the law laid down in *W.P.(C) 12122/2021*, titled as *Okaya Infocom Pvt. Ltd. & Anr. Versus Govt. of NCT of Delhi*.
2. Learned counsel for the petitioner submits that in the judgment of *Okaya Infocom Pvt. Ltd. (Supra)*, it had been directed that substantial compliance of Section 30 of the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948 ("EPH Act") can be achieved by directing that the intending purchaser of the said land will be bound by the outcome of consolidation proceedings.
3. Thus, it is submitted that the purchaser can be bound by the outcome



of the consolidation, and allottee can transfer the land by execution of the sale deed.

4. It is therefore submitted that in this regard, directions may be issued to the *Sub-Registrar, Libaspur, Swarup Nagar, Delhi-110042*.

5. Issue notice. Notice is accepted by learned counsel for the respondents.

6. Learned counsel for the respondents draws the attention of this Court to the Circular dated 14th August, 2025, issued by the Office of the Divisional Commissioner, Government of NCT of Delhi (“GNCTD”), wherein, it is stated that sanction under Section 30 of the EPH Act shall be required only for the lands, situated in villages, where consolidation proceedings are actively ongoing.

7. She further submits that as far as the *Village Singhola* is concerned, the same shall be subject to the outcome of the contempt petition, i.e., *Cont.Cas(C) 1725/2024*, in terms of the order dated 09th March, 2026, passed therein.

8. Having heard learned counsels appearing for the parties, it is to be noted that in the present case, sale of land has taken place in the revenue estate of *Village Singhola*. However, the document pertaining to sale has not been registered and has been kept pending on account of issues relating to consolidation proceedings and non-availability of No Objection Certificate (“NOC”)/Land Status Report (“LSR”) from the Consolidation Officer.

9. It is to be noted that consolidation proceedings are still pending in the revenue estate of *Village Singhola*.

10. In the case of *Smt. Payal Bansal Versus Govt. of NCT of Delhi & Anr.*, *W.P.(C) 6422/2026*, vide order dated 12th May, 2026, this Court, in



view of the judgment passed in the case of *Okaya Infocom Pvt. Ltd. (Supra)*, has categorically held that registration of sale deeds cannot be indefinitely withheld solely on the ground of non-availability of sanction/NOC. Such directions were passed considering the fact of prolonged nature of consolidation proceedings. Accordingly, the Court allowed the registration, by requiring the intending purchaser to furnish an undertaking that they shall be bound by the consolidation proceedings.

11. In view of the aforesaid legal position, the following directions are issued:

- i. Affidavit/undertaking by the petitioner as filed before the *Sub Registrar, Libaspur, Swarup Nagar, Delhi*, 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.
- iii. The undertaking shall form part of the sale deed, so as to put any subsequent transferee to notice.
- iv. Subject to verification of the land acquisition status filed by the competent authority, and in line with the decision in *Okaya Infocom Pvt. Ltd. (Supra)*, it is directed that the registration of the sale deed dated 21st January, 2026 shall not be refused solely on the ground of pendency of the consolidation proceedings or non-availability of NOC/LSR, in that regard.
- v. The request for registration of sale deed dated 21st January, 2026 shall be processed in accordance with law. The sale deed shall be registered in a time-bound manner.

12. It is clarified that the registration shall be without prejudice to the pending consolidation proceedings, and shall remain subject to the rights,



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claims and contentions of the third parties.

13. The registration of the sale deed dated 21st January, 2026 shall further be subject to the orders passed in the pending contempt petition, i.e., *Cont. Cas(C) 1725/2024*.

14. With the aforesaid directions, the present writ petition, along with pending application, is disposed of.

15. The next date of hearing, i.e., 06th August, 2026, stands cancelled.

MINI PUSHKARNA, J

JULY 1, 2026/au