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

+ **W.P.(C) 5787/2026**

SMT. SEEMA RANI

.....Petitioner

Through: **Mr. V.P. Rana, Advocate.**

versus

GOVT. OF NCT OF DELHI & ANR.

.....Respondents

Through: **Ms. Nitika Bhutani, Advocate for R-1, 2.**

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

% **28.04.2026**

1. The Petitioner is the purchaser of agricultural land admeasuring 10 Biswas out of total land measuring 09 Bigha 05 Biswas, comprised in old Khasra No. 149/251 (9-05) and new Khasra No. 142/350 (9-05), situated in the revenue estate of Village Pooth Khurd, Tehsil Narela, District North, Delhi - 110039.
2. The Petitioner has purchased the aforesaid land *vide* Sale Deed dated 17th November, 2025 executed by the recorded owner/vendor, and presented the same for registration before the Sub-Registrar VI-B (Respondent No. 2) on the same date.
3. It is stated on behalf of the Petitioner that despite presentation of the Sale Deed and compliance with all statutory requirements, the same has been kept pending on account of non-availability of a No Objection



Certificate [“NOC”] and has not been registered till date. Aggrieved thereby, the Petitioner has invoked the writ jurisdiction of this Court seeking a direction for registration of the Sale Deed.

4. Counsel for the Respondents submits that since the subject land falls within an area where consolidation proceedings are pending, registration would require an NOC and verification by the competent authority.

5. Insofar as insistence on an 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.

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. Accordingly, it is directed as under:

(i) The Petitioner shall file an undertaking by way of an affidavit stating that the factum of this order shall be disclosed in the event of any further transaction relating to the subject land, prior to the conclusion of the consolidation proceedings. Let the said undertaking be filed within a period of two weeks from today. Upon filing of such undertaking, the Petitioner shall remain bound thereby.

(ii) Any breach of the aforesaid undertaking shall entail consequences in accordance with law. The undertaking shall also form part of the 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. The petition is disposed of in the above terms.

SANJEEV NARULA, J

APRIL 28, 2026

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