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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ **W.P.(C) 6304/2026 & CM APPL. 30939/2026**
OM PARKASH AND ANRPetitioners

Through: Mr. Rajesh Yadav, Senior Advocate
with Mr. Surinder Singh Rana and
Mr. Aditya Sorout, Advocates.

versus

THE GOVT OF N C T DELHIRespondent

Through: Mr. S.K. Sangwan, Advocate.

CORAM:
HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER
08.05.2026

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1. Mr. Rajesh Yadav, Senior Counsel appearing on behalf of the Petitioners, submits that the land in question falls in Village Singhola, Delhi, where consolidation proceedings are presently underway. Mr. Yadav has fairly drawn the attention of this Court to the order dated 09th March, 2026 passed in CONT.CAS(C) 1725/2024 and connected matters, whereby this Court directed that any further transfer in respect of land forming part of consolidation proceedings in respect of the aforesaid Village shall remain subject to further orders of this Court.

2. He further points out that in another petition [W.P.(C) 5178/2026], this Court, *vide* order dated 20th April, 2026, has clarified that the order dated 09th March, 2026 would not come in the way of registration of the Sale



Deed concerned, and shall remain subject to the outcome of CONT.CAS(C) 1725/2024.

3. In light of the foregoing, and having regard to the factual matrix of the present case, the relevant background and submissions, to the extent necessary for disposal of the present petition, are noted hereunder:

3.1. The Petitioners are purchasers of agricultural land measuring 12 Bighas 15 Biswas comprised in Khasra Nos. 17//23, 17//18 and 21//3 situated in the revenue estate of Village Singhola, Delhi. The Petitioners purchased the subject land from M/s M.R. Countryside Pvt. Ltd. through a Sale Deed dated 01st September, 2023 executed for valid consideration.

3.2. It is the case of the Petitioners that the predecessor-in-interest, namely M/s M.R. Countryside Pvt. Ltd., had itself acquired the aforesaid land through duly registered Sale Deeds executed in the year 2012 after obtaining requisite No Objection Certificates [“NOCs”] / Land Status Reports [“LSRs”] from the competent authority. It is further stated that mutation in favour of the said company was duly sanctioned in the revenue records. It is also stated that sanction for construction of a farmhouse upon the subject land was granted by the competent authorities.

3.3. It is stated that the Sale Deed dated 01st September, 2023 was duly presented before Respondent/Sub-Registrar VI-E, Delhi, for registration. However, the registration has not been completed on account of insistence upon an NOC/LSR owing to pendency of consolidation proceedings in Village Singhola. Aggrieved thereby, the Petitioners have approached this Court.

4. This Court has considered the aforementioned background and submissions. As noticed hereinabove, by order dated 20th April, 2026 passed



in W.P.(C) 5178/2026, this Court clarified that the order dated 09th March, 2026 passed in CONT.CAS(C) 1725/2024 shall not come in the way of registration of a Sale Deed already executed and presented for registration, albeit subject to further orders therein.

5. Apart from the aforesaid, insofar as insistence on an 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 above legal position has also 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, the present petition is disposed of with the following directions:

(i) The affidavits/undertakings already placed on record by the Petitioners are taken on record and accepted. The Petitioners shall remain bound by the same.

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.



(ii) The Petitioners shall file an additional undertaking within a period of two weeks from today, wherein they shall specifically declare that the registration of the Sale Deed shall remain subject to further orders passed in CONT.CAS(C) 1725/2024.

(iii) The aforesaid undertakings shall also form part of the Sale Deed so as to put any subsequent transferee to notice. Any breach thereof shall entail consequences in accordance with law.

(iv) 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.

(v) 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.

8. The present petition is disposed of, along with the pending application, in the above terms.

SANJEEV NARULA, J

MAY 8, 2026/as