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

+ W.P.(C) 6422/2026

SMT. PAYAL BANSAL

.....Petitioner

Through:

versus

GOVT. OF NCT OF DELHI & ANR.

.....Respondents

Through:

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

12.05.2026

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1. The Petitioner is a purchaser of agricultural land measuring 6 Bighas 10 Biswas, being $\frac{1}{2}$ undivided share in land measuring 13 Bighas comprised in Khasra Nos. 20//18 (2-04), 23 (3-12), 34//3 (3-12), and 8 (3-12), situated in the revenue estate of Village Singhola, Delhi - 110040.
2. It is stated that the aforesaid land was purchased by the Petitioner from the vendors, namely, Mr. Sanjay Jain and Ms. Alka Jain, for a valid sale consideration, and a Sale Deed dated 24th December, 2025 was executed in favour of the Petitioner.
3. It is stated that the aforesaid Sale Deed was presented before Respondent No. 2, i.e., Sub-Registrar VI-E, Libaspur, for registration on 24th December, 2025 *vide* Receipt No. 2025/20/7940. However, the document has not been registered and is stated to have been kept pending on account of issues relating to consolidation proceedings and non-availability of NOC/LSR. Aggrieved thereby, the Petitioner has approached this Court.



4. Counsel for the Respondents submits that since the land falls within a revenue estate where consolidation proceedings are stated to be pending, registration of the Sale Deed would require appropriate NOC/LSR and verification from the competent authority.

5. Insofar as the insistence on an NOC/LSR founded on the pendency of consolidation proceedings is concerned, this Court in ***Okaya Infocom Pvt. Ltd. & Anr. v. Govt. of NCT of Delhi & Anr.***¹ while dealing with the registration of sale deeds, 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 a sanction/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 was reiterated by this Court 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 Petitioner 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. 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/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 foregoing directions, the petition is disposed of.

SANJEEV NARULA, J

MAY 12, 2026

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