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

+ W.P.(C) 6582/2026

SH. JAI BHAGWAN

.....Petitioner

Through: Ms. Bhawana, Advocate.

versus

GOVT. OF NCT OF DELHI & ANR.

.....Respondents

Through: Mr. Dinesh Malik, Panel Counsel,
GNCTD with Retesh Malik, Mr.
Puneet Jain and Ms. Kiffi Aggarwal,
Advocates.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

14.05.2026

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1. Ms. Bhawana, counsel for the Petitioner, submits that the land in question falls in Village Singhola, Delhi, where consolidation proceedings are presently underway. In this regard, this Court notes that, by order dated 09th March, 2026 passed in CONT.CAS(C) 1725/2024 and connected matters, it was directed that any further transfer in respect of land forming part of consolidation proceedings in the aforesaid Village shall remain subject to further orders of this Court.

2. This Court also notes that in W.P.(C) 5178/2026, *vide* order dated 20th April, 2026, it was clarified that the order dated 09th March, 2026 would not come in the way of registration of Sale Deeds already executed and presented for registration, albeit 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 Petitioner is the purchaser of agricultural land measuring 7 Bighas 12 Biswas and 10 Biswansis, being 1/4th share in agricultural land measuring 30 Bighas and 10 Biswas comprised in Khasra Nos. 18/22 (3-00), 23 (2-04), 20/2 (4-09), 3 (4-16), 9 min (3-17), 26 (0-04), 23/22 (3-04), 23 (0-10), 20/10 (1-14), 8 (4-16) and 9/24 (1-16), situated in the revenue estate of Village Singhola, Delhi. The Sale Deed in respect thereof was executed on 29th December, 2025 for a valid sale consideration.

3.2. It is stated that the aforesaid Sale Deed was duly presented before Respondent No.2 i.e., Sub-Registrar VI-E, Libaspur for registration on the very same day. However, the registration has not been completed on account of insistence upon a No Objection Certificate/Land Status Report [“NOC/LSR”] owing to pendency of consolidation proceedings in Village Singhola. Aggrieved thereby, the Petitioner has approached this Court.

4. Mr. Dinesh Malik, panel counsel for GNCTD, on instructions from the office of the Sub-Registrar, VI-E (Libaspur), submits that, in light of the Circular dated 14th August, 2025 issued by the Office of the Divisional Commissioner, GNCTD, an NOC/LSR is presently not being insisted upon.

5. This Court has considered the aforementioned background and submissions. In view of the clarification issued by this Court in W.P.(C) 5178/2026, the pendency of proceedings in CONT.CAS(C) 1725/2024 would not, by itself, preclude registration of a Sale Deed already executed and presented for registration, subject however to further orders therein.

6. Apart from the aforesaid, insofar as the issue of 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.

7. 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.

8. In view of the aforesaid, the present petition is disposed of with the following directions:

- (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, including the stipulation that the registration of the Sale Deed shall remain subject to the outcome in CONT.CAS(C) 1725/2024.
- (ii) The aforesaid undertaking 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.
- (iii) Subject to verification of the land acquisition status by the competent

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.



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. The present petition is disposed of in the above terms.

SANJEEV NARULA, J

MAY 14, 2026/hc