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

+ **W.P.(C) 6688/2026, CM APPL. 32923/2026**

NARENDER DAHIYA

.....Petitioner

Through: Mr. S.S. Rana, Mr. Neeraj Rana, Mr.
P.S. Anroop and Mr. Gopal Rana,
Advocates.

versus

THE GOVT OF NCT OF DELHI AND ANRRespondents

Through: Mr. Sanjay Kumar Pathak, SC with
Mr. K.K. Kiran Pathak, Mr. Sunil
Kumar Jha, Mr. Md. Sueb Akhtar and
Mr. Kushagra Dixit, Advocates for R-
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Ms. Harshita Nathrani, Advocate for
Mr. Sameer Vashisht, SC for
GNCTD.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

% **15.05.2026**

1. The Petitioner is purchaser of 1/6th share out of land measuring 17 Bigha 2 Biswas comprised in Khasra Nos. 99//7 South (4-6), 99//8 South (4-12), 99//13 North (4-6) and 99//14 North (3-18), situated in the revenue estate of Village Kanjhawala, Delhi.
2. It is stated that the aforesaid share in the land was purchased by the Petitioner from the recorded co-owner, namely Ms. Amita Jhanji, for valid sale consideration, and a Sale Deed dated 21st November, 2025 was duly 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 D (Kanjhawala), for registration on 21st November, 2025, and a receipt/slip acknowledging presentation of the document was also issued on the same date. However, Respondent No. 2 has not proceeded to register the document on account of non-availability of a No Objection Certificate/Land Status Report [“*NOC/LSR*”], purportedly owing to pendency of consolidation proceedings in Village Kanjhawala. Aggrieved thereby, the Petitioner has approached this Court.

4. Counsel for the Respondents submits that since the land is under consolidation proceedings, any transfer would require *NOC/LSR* and verification from the competent authority.

5. 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 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

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.



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:

(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. The present petition is disposed of, along with any pending application(s), in the above terms.

SANJEEV NARULA, J

MAY 15, 2026/nk