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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ **W.P.(C) 6963/2026 & CM APPL. 34255/2026**
SUNIL KUMAR AGGARWALPetitioner
Through: **Mr. Prateek Bazad, Advocate.**
versus

GOVT OF NCT DELHI & ORS.Respondents
Through: **Mr. Sanjay Kumar Pathak, SC with**
Mr. Sunil Kumar Jha and Mr. M. S.
Akhtar, Advocates for R-1.
Mr. Lalitaksh Joshi and Ms. Minu
Kumari, Advocates.

CORAM:
HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

% **19.05.2026**

1. The Petitioner is the purchaser of agricultural land admeasuring 01 Bigha 13 Biswa, comprised in Khasra No. 67//12 Min (1-13), situated in the revenue estate of Village Kanjhawala, Delhi. It is stated that Respondent No. 4, namely Desire Infrabuild Pvt. Ltd., was the recorded owner/co-bhumidhar in respect of the said land.
2. It is stated that the aforesaid land was purchased by the Petitioner from Respondent No. 4 for valid sale consideration and a Sale Deed dated 15th September, 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., the Sub-Registrar, VI-D, Kanjhawala, on 15th September, 2025, after compliance with the requisite legal formalities. However, the document has not been registered on account of pendency of consolidation proceedings in Village Kanjhawala and the requirement of an NOC. 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/permission and verification from 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.

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

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.



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/permission 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

MAY 19, 2026/hc