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

+ **W.P.(C) 7156/2026 & CM APPL. 35072/2026**

SEEMA & ANR.

.....Petitioners

Through: Mr. Abhishek Kukkar, Advocate.

versus

GOVT OF NCT OF DELHI & ANR.

.....Respondents

Through:

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

% **21.05.2026**

1. The Petitioners are the purchasers of agricultural land being 191/1803rd share out of 225/1803rd share in land admeasuring 90 Bighas 03 Biswas, comprised in Khasra Nos. 10/14 (4-16), 16 (4-16), 17 (4-16), 4/1 (4-12), 7 (4-16), 11/1 (2-10), 1/2 (0-02), 11 (4-16), 12/1 (2-01), 20/1 (5-13), 16//15/4/2 (0-07), 6/1/2 (3-13), 7/1/2 (0-08), 17//10 (4-16), 11/1/2 (4-14), 12 (4-16), 19 (4-16), 20/2/2 (2-10), 21/3/2 (0-07), 9 (4-16), 77/17/2 (2-08), 88//15/1 (2-11), 16/1 (3-13), 5/4 (0-02), 6/4 (1-05), 89/21/1 (0-16), 90//1/2 (4-11) and 10 (4-16), situated in the revenue estate of Village Ladpur, Delhi. It is stated that one Mr. Raj Kumar, son of Devi Singh, was the recorded co-owner/co-bhumidhar in respect of the aforesaid share in the said land.

2. It is stated that the aforesaid share in the land was purchased by the Petitioners from Mr. Raj Kumar for valid sale consideration and a Sale Deed dated 25th February, 2021 was duly executed in favour of the Petitioners.

3. It is stated that the aforesaid Sale Deed was presented before Respondent No. 1, i.e., the Sub-Registrar, VI-D (Kanjhawala) on 25th February, 2021 for registration. However, the document has not been



registered on account of pendency of consolidation proceedings in Village Ladpur and the requirement of a No Objection Certificate/Land Status Report [“NOC/LSR”]. Aggrieved thereby, the Petitioners have approached this Court.

4. Counsel for the Respondents submits that since the land is under consolidation proceedings, any transfer would require an 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 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

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.



disposed of by issuing directions in similar terms.

8. Accordingly, it is directed as under:

(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.

(ii) Any breach of the aforesaid undertakings shall entail consequences in accordance with law. The undertakings 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, along with the pending application.

SANJEEV NARULA, J

MAY 21, 2026/ab