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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ **W.P.(C) 7358/2026 & CM APPL. 35880/2026**
SWEETY & ANR.Petitioners

Through: Mr. Pranav Gupta, Proxy Advocate.

versus

G N C T OF DELHI THROUGH CHIEF SECRETARY & ORS.

.....Respondents

Through: Ms. Nitika Bhutani, Panel Counsel
(Civil) for GNCTD.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

% **25.05.2026**

1. The Petitioners are purchasers of agricultural land admeasuring 1 Bigha in land comprised in Khasra Nos. 58//8 Min. (4-15), 9 (4-16), 10/2 (4-12), 11/2 (4-08), 11/3 (0-05), 12 (4-16), 13 (4-16), 18/1 (3-12), 19 (4-16), 20/2 (4-11), 85//6 (4-16), situated in the revenue estate of Village Ladpur, Delhi. It is stated that the Respondent No. 4, namely Mr. Krishan, was the recorded owner/bhumidhar in respect of the said land.

2. It is stated that the aforesaid land was purchased by Petitioner No. 1 from Respondent No. 4 for valid sale consideration and a Sale Deed dated 08th January, 2026 was duly executed in favour of Petitioner No. 1. It is further stated that a Special Power of Attorney [“SPA”] was also executed in favour of Petitioner No. 2 for the purposes of mutation.

3. It is stated that the aforesaid Sale Deed and SPA were presented before Respondent No. 3, i.e., the Sub-Registrar, VI-D, Kanjhawala, on 09th January, 2026 after compliance with the requisite legal formalities. The grievance of the Petitioners is that the documents have not been registered and continue to remain pending on account of the pendency of consolidation



proceedings in Village Ladpur and the requirement of sanction under Section 30 of the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948. Aggrieved thereby, the Petitioners have approached this Court.

4. Ms. Nitika Bhutani, Panel Counsel (Civil) for GNCTD, fairly submits that the issue raised in the present petition is covered by the decisions of this Court in ***Okaya Infocom Pvt. Ltd. & Anr. v. Govt. of NCT of Delhi & Anr.***¹ and subsequent orders following the same. It is submitted that the Respondents have no objection if the present petition is disposed of in terms of the directions issued therein, subject to appropriate safeguards.

5. The aforesaid submission merits acceptance. In ***Okaya Infocom Pvt. Ltd.***, this Court 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/sanction. 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.

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.



7. In view of the aforesaid legal position, having regard to the facts of the present case, and particularly in light of the stand taken by the Respondents, 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 affidavits/undertakings already placed on record by the Petitioners is 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 and the SPA shall not be refused solely on the ground of pendency of consolidation proceedings or non-availability of any sanction 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 25, 2026/ab