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

+ **W.P.(C) 16927/2025, CM APPL. 69589/2025**

AKSHEEV AGARWAL & ORS.

.....Petitioners

Through: Mr. Anurag Singh, Advocate.

versus

GOVT OF NCT OF DELHI & ORS.

.....Respondents

Through: Mrs. K. K. Kiran Pathak, Mr. Sunil Kumar Jha and Mr. Mohd Sueb Akhtar and Mrs. Joohu Kumari, Advocates for R-1.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

% **23.02.2026**

1. Petitioners No. 1 to 3 are co-owners/co-sharers in possession of agricultural land admeasuring 1 Bigha 08 Biswa (being 1/2 share of land measuring 2 Bigha 16 Biswa), comprised in Khata Khatauni No. 33, bearing Khasra No. 22//6/1 (2-16), situated in the revenue estate of Village Ladpur, Delhi - 110081.
2. Petitioners No. 1 to 3, being the recorded owners of the aforesaid land, executed a Sale Deed dated 09th June, 2025 in favour of Petitioner No. 4. The Sale Deed was presented for registration before Respondent No. 2 (Sub-Registrar-VI D). A receipt acknowledging presentation was issued; however, the document has not been processed further.
3. The reason cited for non-processing is the absence of a NOC/Land Status Report, purportedly on account of pendency of consolidation



proceedings in the village. A deficiency memorandum dated 13th June, 2025 was accordingly issued.

4. Counsel for the Petitioners submits that an application for issuance of NOC/Land Status Report was duly filed on 13th December, 2024, and the prescribed fee was deposited on 17th December, 2024. However, no decision has been communicated thereon. It is further submitted that Village Ladpur stands urbanized *vide* notification dated 16th May, 2017 issued under Section 507 of the DMC Act, and therefore, insistence on NOC on account of consolidation proceedings is untenable.

5. Counsel for the Respondents submits that since the land falls in a village where consolidation proceedings are stated to be pending, the Sub-Registrar could not proceed with registration without verification and requisite clearance from the competent authority.

6. 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, while dealing with the registration of sale deeds, 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 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

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.



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 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.

9. Accordingly, it is directed as under:

(i) The Petitioners 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 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 an undertaking, the Petitioners 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 registered 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 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.



10. With the following directions, the petition is disposed of along with pending application(s), if any.

SANJEEV NARULA, J

FEBRUARY 23, 2026

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