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

+ **W.P.(C) 16929/2025, CM APPL. 69593/2025**

**ARVIND KUMAR AGARWAL & ANR.**

.....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**

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1. Petitioner No. 1 is the recorded owner of agricultural land measuring 2 Bigha 02 Biswa, comprised in Khewat No. 114, Khatauni No. 93, bearing Khasra Nos. 21//13/2 min (0-11) and 23/2 min (1-11), situated in the revenue estate of Village Ladpur, Delhi - 110081.
2. Petitioner No. 1 executed a Sale Deed dated 19<sup>th</sup> August, 2025 in favour of Petitioner No. 2. The said Sale Deed was presented for registration before Respondent No. 2 (Sub-Registrar-VI D), and a receipt acknowledging presentation was issued. However, the document has not been processed further.
3. A deficiency memorandum dated 27<sup>th</sup> August, 2025 was issued, citing absence of NOC/Land Status Report, purportedly on account of pendency of consolidation proceedings in Village Ladpur.
4. Counsel for the Petitioners submits that Village Ladpur stands urbanized vide notification dated 16<sup>TH</sup> May, 2017, issued under Section 507



of the DMC Act.

5. Counsel for the Respondents submits that since the land is under consolidation proceedings, the Sub-Registrar could not proceed with registration without requisite verification and 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.***<sup>1</sup>, 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.***<sup>2</sup>, 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.

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:

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<sup>1</sup> In *W.P.(C) 12122/2021*, decided on 10<sup>th</sup> November, 2023.

<sup>2</sup> In *W.P. (C) 12083/2025* & other connected matters decided on 12<sup>th</sup> August, 2025.



- (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/nk**