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

+ **W.P.(C) 17105/2025**

PARDEEP KUMAR

.....Petitioner

Through: Mr. Rajbir Singh Ruhil and
Mr. Umesh Yadav, Advocates.

versus

**ADDITIONAL DISTRICT MAGISTRATE (LAND
ACQUISITION) AND OTHERS**

.....Respondents

Through: Mr. Sanjay Kumar Pathak, SC with
Mr. Sunil Kumar Jha, Mr. Md. Sueb
Akhtar, Mr. Kushagra Dixit and Mr.
Joohu Kumari, Advocates for R-1.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

30.04.2026

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1. The Petitioner is a co-owner in possession of agricultural land admeasuring 1/28th share out of total land measuring 29 Bigha 10 Biswas, bearing Khasra Nos. 1 etc.//303 (9-9) and 338 (20-1), situated in the revenue estate of Village Mundhela Khurd, Tehsil Najafgarh, Delhi.
2. It is stated that, owing to *bona fide* needs, the Petitioner decided to sell his share in the aforesaid land and, accordingly, executed and presented a Sale Deed dated 27th March, 2025 before Respondent No. 3 i.e., the Sub-Registrar IX-A, Najafgarh, for registration.
3. The grievance of the Petitioner is that the said Sale Deed has not been registered and remains pending on account of non-availability of a No Objection Certificate [“NOC”] / Land Status Report [“LSR”] from the



competent authority, purportedly on the ground that consolidation proceedings in respect of the subject village are ongoing. Aggrieved thereby, the Petitioner has approached this Court seeking appropriate directions.

4. Counsel for the Respondents submits that since the land is under consolidation proceedings, any transfer would require permission/sanction 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/LSR. 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.

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.



8. Accordingly, it is directed as under:

(i) The Petitioner and the intending purchaser shall file undertaking(s) 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(s) be filed within a period of two weeks from today. Upon filing of such undertaking(s), the Petitioner and the intending purchaser shall remain bound thereby.

(ii) Any breach of the aforesaid undertaking(s) shall entail consequences in accordance with law. The undertaking(s) 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/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. The petition is disposed of in the above terms.

SANJEEV NARULA, J

APRIL 30, 2026/nk