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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
+ **W.P.(C) 17673/2025 & CM APPL. 73001/2025**
PRATIBHA DAGAR & ANR.Petitioners

Through: Mr. Jai Narayan and Mr. V.P. Dabas,
Advocates.

versus

GOVT OF N C T OF DELHI & ORS.Respondents
Through: Ms. Avni Singh, Panel counsel
(GNCTD) with Mr. Abhishek Yadav,
Advocate for GNCTD.

CORAM:
HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

% **16.04.2026**

1. The Petitioners are purchasers of agricultural land to the extent of approximately 1/8th share (measuring about 3 Bigha 4 Biswa 17 Biswansi) out of total land measuring 25 Bigha 19 Biswa, comprised in Khasra Nos. 71//8 (4-11), 9 (4-16), 12 (6-17), 19 (3-15), 73//21/2 (1-04) and 22 (4-16), situated in the revenue estate of Village Ladpur, Delhi – 110081.
2. The recorded co-owner (proforma Respondent No. 4), being in possession of the aforesaid share, executed a Sale Deed dated 02nd August, 2023 in favour of Petitioner No. 1. The said Sale Deed, along with a Special Power of Attorney of even date executed in favour of Petitioner No. 2 for purposes of mutation, was presented for registration before Respondent No. 3 (Sub-Registrar VI-D).
3. At the time of presentation, the Petitioners were required to furnish a Land Status Report¹/No Objection Certificate² in respect of the subject land. A Deficiency Memorandum dated 02nd August, 2023 was accordingly issued

¹ “LSR”



by Respondent No. 3, noting the absence thereof and stipulating that failure to comply would result in refusal of registration of the Sale Deed.

4. The Petitioners contend that the insistence on such NOC/LSR is untenable, particularly when issuance of the same has been stopped on account of pendency of consolidation proceedings, thereby rendering compliance impossible.

5. Counsel for the Respondents submits that since consolidation proceedings are pending in Village Ladpur, the Sub-Registrar cannot proceed with registration without the requisite NOC/LSR from the competent authority.

6. Insofar as insistence on 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.***³, 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.***⁴, 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

² “NOC”

³ In *W.P.(C) 12122/2021*, decided on 10th November, 2023.



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 affidavit/undertaking already placed on record by the Petitioners, in terms of the judgment of this Court in ***Okaya Infocom Pvt. Ltd.***, is taken on record and accepted. The Petitioners shall remain bound by the same.

(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 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. In the above terms, the petition is disposed of, along with any pending application(s).

SANJEEV NARULA, J

APRIL 16, 2026/as

⁴ In W.P. (C) 12083/2025 & other connected matters decided on 12th August, 2025.