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

+ W.P.(C) 3717/2026 & CM APPL. 18198/2026

MS ZENCREST ESTATE LLP AND ORS

.....Petitioners

Through: Mr. S. S. Rana, Mr. Anuroop P. S.
and Mr. Gaurav Bidhuri, Advocates.

versus

THE GOVT OF NCT OF DELHI AND ANR

.....Respondents

Through: Ms. Avni Singh, Panel Counsel,
GNCTD with Mr. Vaibhav Sharma,
Advocate for State.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

23.03.2026

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1. The Petitioners comprise the purchaser and sellers of the subject land, with Petitioner No. 1 being the purchaser (a Limited Liability Partnership firm) and Petitioners No. 2 and 3 being the recorded co-owners/sellers. The land in question comprises land measuring 9 bighas 12 biswas out of 1/3rd share comprised in Khasra Nos. 35//11/1 (4-12), 12 (4-16), 19/1 (4-12), 36//15 (4-16), 16 (4-16), 25 (4-16), 14 min (2-00), 39//5/2/1 (3-12), 6 (4-16), 40//10 (4-16), 11 min (4-04), 1/2/2 min (0-12), 43//23 (4-16), 44//11/4 (1-12), 12 (4-16), 11/1 (1-12), 11/2 (0-16), 11/3 (0-16), 45//15/1 (4-09), 5/2 (2-05), 6/1 (4-09), 56//2/1 (2-08), 3 (4-16), 4 (4-16), 5/1 (2-08), 6 (4-16), 51//22 (4-16), 25/1 (2-08), 23/1/2 min (2-12), 24 min (2-08), 16 min (3-12), 81//4 (4-02), 84//24 (4-16), 25 min (0-11), 16/2 min (0-12), situated in the revenue estate of Village Ladpur, Delhi. A sale deed dated 30th January, 2025 was executed by Petitioners No. 2 and 3 in favour of Petitioner No. 1 and was duly presented before Respondent No. 1 (Sub-Registrar) for registration. A



receipt evidencing such presentation has been issued; however, the said sale deed has neither been registered nor has any formal order of refusal been passed

2. It is the case of the Petitioners that despite the lapse of time and repeated follow-ups, the sale deed remains pending, thereby constraining the Petitioners to invoke the writ jurisdiction of this Court.

3. Counsel for the Respondents submits that the land in question is under consolidation proceedings and, in the absence of a No Objection Certificate (NOC)/Land Status Report from the competent authority, the registration could not be processed. Reliance is also placed on administrative instructions/circulars requiring such NOC in areas where consolidation proceedings are stated to be pending.

4. As regards the requirement of NOC founded on the pendency of consolidation proceedings, this Court in ***Okaya Infocom Pvt. Ltd. & Anr. v. Govt. of NCT of Delhi & Anr.***³ has ruled that considering the prolonged nature of consolidation proceedings, registration of a sale deed cannot be indefinitely withheld on the ground of non-availability of an NOC. The Court accordingly directed the Sub-Registrar to proceed with registration in accordance with law, without insisting upon any sanction, approval, or NOC linked to consolidation. The same view was reiterated by this Court by judgment dated 12th August, 2025 in ***Jeevantika Organic Farming LLP v. Govt of NCT of Delhi & Ors.***,⁴ and other connected matters. In the said case, the Court taking note of the stand of the government, provided for an undertaking to be furnished by the intending purchaser.

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

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



5. In light of the aforementioned decisions, this Court is of the opinion that the present petition can be disposed of by issuing directions in similar terms.

6. Accordingly, the following directions are issued:

(i) The Petitioner 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. The undertaking already placed on record to this effect is accepted and the Petitioner shall remain bound thereby.

(ii) Any violation of the aforesaid undertaking shall entail consequences in accordance with law. The said undertaking shall also form part of the registered sale deed, so as to put any subsequent purchaser to notice of the subsisting undertaking.

(iii) Subject to verification of the land acquisition status, 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 dated 18th December, 2025, which is pending with Respondent No. 2, shall not be refused solely on the ground of pendency of consolidation proceedings or non-availability of any NOC in that regard. The same be proceeded 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.

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

SANJEEV NARULA, J

MARCH 23, 2026/hc