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

+ **W.P.(C) 7196/2026**

SMT. BIMLA DEVI & ORS.

.....Petitioners

Through: Mr. Sachin Shukla, Mr. Ankit Duhan,
Mr. Tarun Sharma, Mr. Sahil Dalal,
Mr. Aakash Passi, Mr. Pankaj Handa,
Mr. Yash Chhabra, Mr. Navtesh
Kumar, Mr. Ajay Sharma and
Mr. Sawan Kumar, Advocates for P-1
to P-5.

versus

THE GOVT. OF NCT OF DELHI & ORS.

.....Respondents

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

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

% **22.05.2026**

1. The Petitioners are the purchasers of agricultural land admeasuring 04 Bighas 16 Biswas, out of land comprised in Khata No. 151/131 (new Khata Khatoni No. 156), bearing Khasra Nos. 14/21 (4-16), 20 (4-16), 15/16/2 (2-19), 25/2 (3-10), 16/5/2 (5-13), 17/1 (4-16), 32/12/1 (0-12), 43/17/2 (1-12), 65/12/2 (0-12), 87/14/1 (2-18), 16/1 (2-08), 17/1 (4-03), 90/11/1 (2-08) and 12/1 (1-08), situated in the revenue estate of Village Ladpur, Delhi. It is stated that Respondents No. 4 and 5, namely Mr. Jai Pal and Mr. Sat Pal, were the recorded co-owners/co-bhumidhars in respect of the aforesaid share in the said land.
2. It is stated that the aforesaid share in the land was purchased by the



Petitioners from Respondent Nos. 4 and 5 for valid sale consideration and a Sale Deed dated 19th March, 2021 was duly executed in favour of the Petitioners.

3. It is stated that the aforesaid Sale Deed was presented before Respondent No. 2, i.e., the Sub-Registrar, VI-D, Kanjhawala, on 18th October, 2023 for registration. However, the document has not been registered on account of pendency of consolidation proceedings in Village Ladpur and the requirement of a No Objection Certificate/Land Status Report [“NOC/LSR”]. Aggrieved thereby, the Petitioners have approached this Court.

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

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.

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.

8. Accordingly, it is directed as under:

(i) The Petitioners shall file undertaking(s) by way of affidavit(s) 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 Petitioners 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 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

MAY 22, 2026

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