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

+ W.P.(C) 17140/2025

SNEH LATA & ORS.

.....Petitioners

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

versus

ADDITIONAL DISTRICT MAGISTRATE (LAND
ACQUISITION) AND OTHERS & ORS.

.....Respondents

Through: Mr. Lalitaksh Joshi and Ms. Minu
Kumari, Advocates for GNCTD.
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 Petitioners are co-owners/co-sharers in possession of 3/5th share in agricultural land admeasuring 48 Bigha 12 Biswas, bearing Khasra Nos. 1 etc./169/2 (4-12), 169/6 (4-10), 278 (35-9) and 546 (4-01), situated in the revenue estate of Village Mundhela Khurd, Tehsil Najafgarh, New Delhi.
2. It is stated that, owing to their *bona fide* needs, the Petitioners decided to sell their share in the aforesaid land and, accordingly, applied for issuance of a No Objection Certificate ["NOC"] / Land Status Report ["LSR"] on 24th July, 2025. Thereafter, in terms of the applicable circular, the Petitioners also applied for sanction under Section 30 of the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948 on 22nd September, 2025 before the competent authority.
3. The grievance of the Petitioners is that despite the aforesaid applications, no decision, either granting or rejecting the NOC/LSR or



sanction, has been communicated till date. It is further stated that the proposed transaction is being stalled on account of non-availability of such NOC/LSR/sanction, purportedly on the ground that consolidation proceedings in respect of the subject village are ongoing. 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 permission/sanction and verification from the competent authority.

5. Insofar as insistence on sanction/NOC 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 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

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.



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 and the intending purchaser(s) 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 Petitioners and the intending purchaser(s) 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 proposed 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