



1. Smt. Sawmya Sathyan vs. ITO [ITA 1224/Bang/2019](Assessment Year:2014-15) [2021] 211 TTJ (Bang) 101 Section 50C – Transferable Development Right is not a capital asset for the purpose of section 50C of the Act – Provisions of section 50C cannot be attracted to the rights attached to land or building. Facts The assessee made an investment of ₹ 1.32 crores towards purchase of TDR (Transferable Development Rights) from Shri David Raj C during the year under consideration. A deed of conveyance dated 20.04.2014 was executed to that effect and the assessee paid a consideration of ₹ 1.14 crores for receipt of TDR of 50000 sq.ft. at ₹ 224/- per sq ft as against ₹ 1032/- determined by sub-registrar. However, the stamp duty of ₹ 5,84,000/- and registration charges of ₹ 5,17,000/- wa.....