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

+ W.P.(C) 3998/2026 & CM APPL. 19601/2026

BACHAN SINGH

.....Petitioner

Through: Ms. Aditi Gupta, DHCLSC with Ms. Lavanya Bhardwaj and Mr. Akash Deep, Advocates with Petitioner-in-person.

versus

CONSOLIDATION OFFICER

.....Respondent

Through: Mr. Manashwy Jha, Panel Counsel (Civil) for GNCTD.

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+ W.P.(C) 4016/2026 & CM APPL. 19651/2026

BACHAN SINGH

.....Petitioner

Through: Ms. Aditi Gupta, DHCLSC with Ms. Lavanya Bhardwaj and Mr. Akash Deep, Advocates with Petitioner-in-person.

versus

CONSOLIDATION OFFICER & ANR.

.....Respondents

Through: Mr. Manashwy Jha, Panel Counsel (Civil), GNCTD for R-1 to R-3.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

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30.03.2026

1. Since both petitions have been instituted by the same Petitioner and



arise out of the same consolidation proceedings concerning Village Khera Kalan, they are being disposed of by this common order.

2. Village Khera Kalan was brought under consolidation process by notification dated 27th November, 1996 issued by the Lieutenant Governor of Delhi under the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948. Subsequently, on 20th November, 2019, the village was declared urbanised. Even so, the consolidation proceedings did not get concluded. On the contrary, this Court, in W.P.(C) No. 10305/2020, by order dated 11th December, 2020, directed that the consolidation proceedings be concluded within six months.

3. Thereafter, on 19th September, 2022, the consolidation proceedings were recorded as having been completed, and directions were issued to the *Halka Patwari* and *Kanoongo* to prepare new land records in accordance with the consolidation scheme. By a further communication dated 29th September, 2022, issued from the office of the Consolidation Officer, it was again recorded that the proceedings stood completed on 19th September, 2022, while also noting that formal consent of the Settlement Officer (Consolidation) was still awaited for consignment of the record, as review and scrutiny of the consolidation record were continuing.

4. It is in this background that the present grievances have arisen. The Petitioner asserts that, while the proceedings were still alive, he had been raising objections regarding discrepancies in the record. According to him, those objections related, *inter alia*, to incorrect recording of his name in the additional khata, non-reflection of caste identity, incorrect mention of house number, non-consolidation of residential land measuring 2 Biswa in Khasra No. 105/6 min from Khata No. 306 into main Khata No. 308, despite a



relinquishment deed executed by his brother in his favour, and omission to mention the direction “*west*” in relation to Khasra No. 59/15 min measuring 8 Biswa in Khata No. 308.

5. It is also the Petitioner’s case that an additional grievance survives in W.P.(C) 4016/2026, relating to the non-inclusion of his name in the Demand List of Village Khera Kalan, Delhi, which has likewise been placed before the authorities for necessary correction. According to the Petitioner, these are not fresh claims raised after the entire process had long concluded, but objections to errors in the record that were pointed out while the consolidation exercise was still ongoing and records were being scrutinised.

6. When the Petitioner’s representations did not yield any result, he preferred revision petitions. Those petitions, being Revision Petition No. 213/2025 and 214/2025, came to be decided by two separate orders dated 17th December, 2025 passed by the Financial Commissioner [“FC”]. The FC appears to have proceeded on the footing that, since the land stood urbanised, the Consolidation Officer no longer retained jurisdiction to examine the issues raised by the Petitioner.

7. The Petitioner assails that approach by pointing out order dated 12th January, 2026 passed by the FC in Case No. 226/2025, arising in relation to the same village, at the instance of another person, Kulwant Rana, where directions were issued to the Consolidation Officer to take a decision, in accordance with law, on pending representations. On that basis, it is urged that the authority could not, in the Petitioner’s case, adopt a wholly contrary position and decline consideration altogether by citing urbanisation alone.

8. The submission on behalf of the Respondents, on the other hand, is that once the village stood urbanised, the jurisdiction of the consolidation



authorities came to an end, and the FC was therefore justified in declining interference. That contention cannot be brushed aside lightly. Urbanisation does have legal consequences, and the continuation of jurisdiction after such event may not be assumed as a matter of course.

9. Even so, the Court is not persuaded that the matter could have been disposed of in the summary manner in which it appears to have been dealt with. The record itself shows that, notwithstanding urbanisation in November 2019, the consolidation proceedings were allowed to continue; this Court's order dated 11th December, 2020 directed their completion, which was recorded only on 19th September, 2022. In these circumstances, a blanket rejection of the Petitioner's objections on the sole premise that urbanisation had put an end to jurisdiction does not satisfactorily address the actual course of events.

10. There is another reason why the impugned approach cannot be sustained. The Petitioner's grievances, at least *prima facie*, are in the nature of alleged mistakes or omissions in the consolidation record itself. Whether those grievances are correct or not is a separate matter. But if the objections were indeed raised while the proceedings and scrutiny were still in progress, they could not have been dismissed without a reasoned determination as to whether the Consolidation Officer remained competent to deal with them, whether some other authority was the competent forum, or whether any part of the grievance was still capable of correction in law.

11. This Court is also not inclined to ignore the Petitioner's submission regarding the order passed by the FC on 12th January, 2026 in relation to the same village. The Court does not propose to pronounce upon parity as a matter of right on the basis of an order passed in another case. However,



when the same authority, in relation to the same village and a broadly similar consolidation context, has adopted a course of remitting pending representations for decision, the departure in the present case required a clearer and more reasoned justification than what presently appears on record.

12. In these circumstances, this Court does not consider it necessary, in the present proceedings, to finally pronounce upon the larger question whether the consolidation authorities continue to retain jurisdiction in all respects after urbanisation. That issue may depend on the nature of the grievance, the stage of proceedings, and the statutory consequences of urbanisation. What can, however, be said is that the Petitioner's representations could not have been rejected by a bare invocation of urbanisation without a proper examination of the nature of the objections and the forum competent to address them.

13. The proper course, therefore, is to require a fresh and reasoned consideration of the Petitioner's pending representations. Such consideration may be undertaken by the concerned Consolidation Officer, if he is of the view that the matter still falls within his competence, or by such other authority as is found to be the competent authority in law. If the authority receiving the matter concludes that it lacks jurisdiction, it shall not stop there. It shall pass a reasoned order indicating why jurisdiction is lacking and, if the law so permits, forward the Petitioner's representations to the authority considered competent, under due intimation to the Petitioner.

14. Accordingly, the present writ petitions are disposed of with a direction that the representations dated 29th July, 2025, 29th August, 2025 and 5th September, 2025 in W.P.(C) No. 3998/2026, and the representations



dated 24th January, 2000 and 16th October, 2025 in W.P.(C) No. 4016/2026, shall be considered afresh by the concerned Consolidation Officer, or by such other competent authority as may be found appropriate in law. The said exercise shall be completed within eight weeks from today, after affording an opportunity of hearing to the Petitioner and to any other person whose rights may be affected.

15. The decision so taken shall be communicated to the Petitioner in writing forthwith. If the Petitioner remains aggrieved thereafter, it shall be open to him to avail such remedies as may be available in law.

16. The writ petitions are disposed of in the above terms. Pending applications, if any, also stand disposed of.

SANJEEV NARULA, J

MARCH 30, 2026/hc