

LAND TRANSACTION TAX AND ANTI-AVOIDANCE OF DEVOLVED TAXES (WALES) ACT 2017

EXPLANATORY NOTES

COMMENTARY ON SECTIONS

Part 8 – Interpretation and Final Provisions

Schedule 18 - Charities relief

Joint purchase by qualifying charity and another person: partial relief

391. [Paragraph 6](#) of this Schedule makes provision for partial relief for joint buyers where:
- there are two or more buyers under a land transaction;
 - the buyers acquire the land as tenants in common;
 - at least one of the buyers is a qualifying charity and at least one of the buyers is another person who is not; and
 - the transaction is not entered into to avoid the LTT charge.
392. Partial relief is calculated by reducing the tax due on the transaction by the amount of relief provided for under sub-paragraph (3). This states that the relief available is equal to the “relevant proportion” of the tax that would otherwise have been chargeable on the transaction.
393. Relevant proportion is defined as the lower of the proportion of the subject-matter acquired by all the qualifying charities (P1) and the proportion of the chargeable consideration for the transaction that is given by the qualifying charities (P2).