

Freedom of Information Officer,  
Welsh Revenue Authority,  
PO Box 108  
Merthyr Tydfil  
CF47 7DL  
Email: [data@wra.gov.wales](mailto:data@wra.gov.wales)

xxx

1st May 2024

Dear xxx

### **WRA-FOI-0063 – LTT Relief for 6+ properties**

Thank you for your request, which I received on 15th April 2024 about LTT relief for 6+ properties. Our response is below.

The relief you refer to is not in fact a relief, but a rule that allows a taxpayer purchasing six or more residential dwellings to apply the non-residential rate schedule to the transaction. There is reference to this in the consultation. One way to estimate the value of this rule is to work out what the tax would have been had the higher residential rate applied to the same transactions. That would seem likely in the absence of the rule, and we would then subtract the tax actually paid to get a first line estimate of the value of the rule. However, with the rule not actually being a relief, there are reliefs that can also apply to these transactions, and so we should then also take those into account when making this calculation.

We have done that using the data for 2023-24, the first cut of which was published on 25 April 2024. Within these published figures we were able to identify 75 transactions that gave the reason for applying the non-residential rate schedule as purchasing six or more dwellings. Applying the above calculation to those, including taking account of actual reliefs claimed, we estimate an upper bound of £1.6m of tax that might otherwise have been chargeable had the rule not applied. This figure is an upper bound as it takes no account of any transactions that might have been structured differently or not happened at all, each of which in practice would have reduced the amount of tax collected.

The estimate is included as part of series of tables we have added to our webpage for our published data ([Land Transaction Tax statistics: January to March 2024](#)). That also provides some further broad breakdowns of the 75 transactions in 2023-24, by value of transaction, type of buyer and for some local areas, as well as some further analysis of similar data for multiple dwellings relief in 2023-24.

I trust this answers your question.

If you are dissatisfied with the Welsh Revenue Authority's handling of your request, you can ask for an internal review within 40 working days of the date of this

response. Requests for an internal review should be addressed to the Welsh Revenue Authority's Freedom of Information Officer at:

Freedom of Information Officer,  
Welsh Revenue Authority,  
PO Box 108,  
Merhyr Tydfil.  
CF47 7DL

or Email: [data@wra.gov.wales](mailto:data@wra.gov.wales)

Please remember to quote the reference number above.

You also have the right to complain to the Information Commissioner. Please note however that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

The Information Commissioner can be contacted at: Information Commissioner's Office,  
Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire,  
SK9 5AF.  
Tel: 01625 545 745  
Email: [casework@ico.gsi.gov.uk](mailto:casework@ico.gsi.gov.uk)

Yours sincerely  
Freedom of Information Officer