
1 Withdrawal of group relief

- (1) Part 1 of Schedule 7 to FA 2003 (stamp duty land tax: group relief) is amended as follows.
- (2) In paragraph 4 (cases in which group relief not withdrawn), omit sub-paragraphs (4) and (5).
- (3) In the italic heading before paragraph 4ZA, after “vendor” insert “is wound up etc or”.
- (4) In paragraph 4ZA (group relief not withdrawn where vendor leaves group) –
 - (a) in sub-paragraph (1) –
 - (i) after “vendor”, in the first place it occurs, insert “ –
(a) by reason of anything done for the purposes of, or in the course of, winding up the vendor or another company that is above the vendor in the group structure, or”;
 - (ii) the remaining text becomes paragraph (b);
 - (b) in sub-paragraph (2), for “The vendor is” substitute “For the purpose of sub-paragraph (1)(b) the vendor is”;
 - (c) in sub-paragraph (3), for “purpose of sub-paragraph (2)” substitute “purposes of sub-paragraphs (1) and (2)”;
 - (d) in sub-paragraph (4), for “vendor leaves the group” substitute “purchaser ceases to be a member of the same group as the vendor (as mentioned in sub-paragraph (1))”.
- (5) The amendments made by this section have effect in relation to land transactions the effective date of which falls on or after 29 October 2026.
- (6) But those amendments do not have effect in relation to a land transaction which –
 - (a) is effected in pursuance of a contract entered into before 29 October 2026, and
 - (b) is not excluded.
- (7) For this purpose a land transaction is excluded if –
 - (a) there is any variation of the contract, or assignment of rights under the contract, on or after 29 October 2026,
 - (b) the transaction is effected in consequence of the exercise on or after that date of any option, right of pre-emption or similar right, or
 - (c) on or after that date, there is an assignment, subsale or other transaction relating to the whole or part of the subject-matter of the contract as a result of which a person other than the purchaser under the contract becomes entitled to call for a conveyance.