

# EdwinCoe LLP

## Property – a UK tax timeline...



### Key

- ATED** = Annual Tax on Enveloped Dwellings
- CGT** = Capital Gains Tax
- CT** = Corporation Tax
- GROB** = Gift with Reservation of Benefit
- IHT** = Inheritance Tax
- NRB** = Nil Rate Band
- PRR** = Private Residence Relief
- SDLT** = Stamp Duty Land Tax





# UK residential property – typical non-domicile ownership structures

	Personal ownership	Non-UK company	Non-UK trustees	Non-UK trustees holding non-UK shares
<b>Inheritance Tax (IHT)</b>	IHT exposure	IHT from 6 April 2017	Potential entry charge, 10 year anniversary charges, exit charges, potentially GROB	Potential entry charge, 10 year anniversary charges, exit charges, potentially GROB
<b>Annual Tax on Enveloped Dwellings (ATED)</b>	No ATED	ATED (unless reliefs apply)	No ATED	ATED (unless reliefs apply)
<b>Capital Gains Tax (CGT) on disposal</b>	CGT (if non-resident, post 5 April 2015 gains (NRCGT)) PRR possibly	ATED-CGT / NRCGT and /or gains attributed under S.13 TCGA	NRCGT and CGT on pre-6 April 2015 if matched	ATED-CGT, NRCGT and/or CGT on gains if matched
<b>Taxation of rental income</b>	Income tax	Income tax - non-resident landlord regime (though CT post April 2020)	Income tax - non-resident landlord regime	Income tax (though CT post April 2020)
<b>Stamp Duty Land Tax (SDLT) on acquisition</b>	SDLT at normal rates (3% surcharge can apply) 1st time buyer relief if <£500,000	SDLT at 15% (though relief if let, but 3% surcharge can apply)	SDLT at normal rates (3% surcharge generally applies)	SDLT at 15% (though relief if let, but 3% surcharge can apply)

## Contacts

If you would like any further information about this topic, please contact us using the details below.



**Sean Bannister**  
Partner  
t: +44 (0)20 7691 4135  
e: sean.bannister@edwincoe.com



**Andrew Terry**  
Corporate Tax Partner  
t: +44 (0)20 7691 4188  
e: andrew.terry@edwincoe.com



**Kieron Clement-Smith**  
Senior Tax Manager  
t: +44 (0)20 7691 4139  
e: kieron.clement-smith@edwincoe.com

Edwin Coe LLP  
2 Stone Buildings  
Lincoln's Inn  
London  
WC2A 3TH

t: +44 (0)20 7691 4000  
e: info@edwincoe.com  
edwincoe.com

Edwin Coe LLP is a Limited Liability Partnership, registered in England & Wales (No.OC326366). The Firm is authorised and regulated by the Solicitors Regulation Authority. A list of members of the LLP is available for inspection at our registered office address: 2 Stone Buildings, Lincoln's Inn, London, WC2A 3TH. "Partner" denotes a member of the LLP or an employee or consultant with the equivalent standing.  
**This guide concerns the law in England and Wales and is intended for general guidance purposes only. It is essential to take specific legal advice before taking any action**

