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6 March 2024

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# **Resolutions to be moved by the Chancellor of the Exchequer**

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The Chancellor of the Exchequer

PROVISIONAL COLLECTION OF TAXES: That, pursuant to section 5 of the Provisional Collection of Taxes Act 1968, provisional statutory effect shall be given to the following motions:—

- (a) Stamp duty land tax (first-time buyers' relief: new leases acquired on bare trust) (motion no. 8);
- (b) Stamp duty land tax (registered providers of social housing) (motion no. 9);
- (c) Stamp duty land tax (purchases by public bodies) (motion no. 10);
- (d) Value added tax (late payment interest and repayment interest) (motion no. 22).

## ARRANGEMENT OF WAYS AND MEANS RESOLUTIONS

1. Income tax (charge)
2. Income tax (main rates)
3. Income tax (default and savings rates)
4. Income tax (starting rate limit for savings)
5. High income child benefit charge (increase in thresholds)
6. Capital gains tax (reduction in higher rate for residential property gains to 24%)
7. Stamp duty land tax (abolition of multiple dwellings relief)
8. Stamp duty land tax (first-time buyers' relief: new leases acquired on bare trust)
9. Stamp duty land tax (registered providers of social housing)
10. Stamp duty land tax (purchases by public bodies)
11. Inheritance tax (agricultural property relief and woodlands relief)
12. Corporation tax (charge and main rate for financial year 2025)
13. Corporation tax (standard small profits rate and fraction for financial year 2025)
14. Credit for low-budget British films
15. Theatre tax credit
16. Orchestra tax credit
17. Museums and galleries exhibition tax credit
18. Energy (oil and gas) profits levy (energy security investment mechanism)

19. Collective investment schemes (unauthorised co-ownership schemes)
20. Economic crime (anti-money laundering) levy (amount of charge)
21. Transfer of assets abroad (closely-held companies)
22. Value added tax (late payment interest and repayment interest)
23. Value added tax (other minor amendments)
24. Collective money purchase schemes
25. Incidental or consequential provision

### 1. Income tax (charge)

That income tax is charged for the tax year 2024-25.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

### 2. Income tax (main rates)

That for the tax year 2024-25 the main rates of income tax are as follows—

- (a) the basic rate is 20%,
- (b) the higher rate is 40%, and
- (c) the additional rate is 45%.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

### 3. Income tax (default and savings rates)

That—

- (1) For the tax year 2024-25 the default rates of income tax are as follows—
  - (a) the default basic rate is 20%,
  - (b) the default higher rate is 40%, and
  - (c) the default additional rate is 45%.
- (2) For the tax year 2024-25 the savings rates of income tax are as follows—
  - (a) the savings basic rate is 20%,

- (b) the savings higher rate is 40%, and
- (c) the savings additional rate is 45%.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

#### 4. Income tax (starting rate limit for savings)

That—

- (1) For the tax year 2024-25 the amount specified in section 12(3) of the Income Tax Act 2007 (the starting rate limit for savings) is “£5,000”.
- (2) Accordingly, section 21 of that Act (indexation) does not apply in relation to the starting rate limit for savings for that tax year.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

#### 5. High income child benefit charge (increase in thresholds)

That provision may be made—

- (a) amending sections 681B(1)(a) and 681C(2)(b) of the Income Tax (Earnings and Pensions) Act 2003 by substituting “£60,000” for “£50,000”, and

(b) amending section 681C(2)(b) of that Act by substituting “£200” for “£100”.

6. Capital gains tax (reduction in higher rate for residential property gains to 24%)

That—

(1) In section 1H of the Taxation of Chargeable Gains Act 1992 (the main rates of CGT)—

(a) after subsection (1) insert—

“(1A) Residential property gains (see Schedule 1B) accruing in a tax year to an individual are charged to capital gains tax at a rate of 18% or 24%.”,

(b) in subsection (2), omit paragraph (a) together with the “or” at the end of the paragraph,

(c) after subsection (4) insert—

“(4A) Residential property gains accruing in a tax year to the personal representatives of a deceased individual are charged to capital gains tax at a rate 24%.”,

(d) in subsection (5), omit paragraph (a) together with the “or” at the end of the paragraph, and

(e) in subsection (7), for “28%” substitute “24%”.

- (2) In section 11 of that Act (income taxed at higher rates or gains exceeding unused basic rate band)—
- (a) in subsection (1)—
    - (i) before paragraph (a) insert—
      - “(za) at the rate of 24% (if they are residential property gains),”, and
    - (ii) in that paragraph, omit “residential property gains or”,
  - (b) in subsection (2), in the words after paragraph (b)—
    - (i) after “is charged at the rate of” insert “24% (so far as comprising residential property gains), at the rate of”, and
    - (ii) omit “residential property gains or”,
  - (c) in subsection (5)—
    - (i) before paragraph (a) insert—
      - “(za) at the rate of 24% (if they are residential property gains),”, and
    - (ii) in that paragraph, omit “residential property gains or”, and
  - (d) in subsection (9)—
    - (i) before paragraph (a) insert—
      - “(za) at the rate of 24% (if they are residential property gains),”, and
    - (ii) in that paragraph, omit “residential property gains or”.



- (3) The amendments made by this Resolution have effect in relation to disposals made on or after 6 April 2024.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

7. Stamp duty land tax (abolition of multiple dwellings relief)

That—

- (1) Section 58D of, and Schedule 6B to, the Finance Act 2003 (relief for transfers involving multiple dwellings) are repealed.
- (2) In consequence of the repeal of those provisions—
- (a) in Part 4 of the Finance Act 2003—
- (i) in section 87(3) (interest on unpaid tax: meaning of “relevant date”), omit paragraph (aza),
- (ii) in Schedule 4A (higher rates for certain transactions), in paragraph 2(6), omit paragraph (d) and, in paragraph 7, for sub-paragraph (6) substitute—
- “(6) In sub-paragraph (5)—  
“contract” includes any agreement;

“relevant deeming provision” means any of sections 44 to 45A, paragraph 5(1) or (2) of Schedule 2A or paragraph 12A or 19(3) of Schedule 17A.”,

- (iii) in Schedule 5 (amount of tax chargeable: rent), in paragraph 9, in sub-paragraph (4), omit “or 6B” and, in sub-paragraph (5), omit “or Schedule 6B”,
  - (iv) in Schedule 10 (returns, enquiries, assessments and appeals), in paragraph 12(2A)(a), for “, 81A” substitute “or 81A” and omit “or paragraph 6 of Schedule 6B (adjustment for change of circumstances)”, and
  - (v) in Schedule 15 (partnerships), in paragraphs 11(2C) and 19(2C), in the substituted paragraph, omit “or 6B”,
- (b) in Schedule 36 to the Finance Act 2008 (information and inspection powers), in paragraph 21A(7), omit paragraph (b) and the “or” before it, and
- (c) in the Finance Act 2011, omit section 83 and Schedule 22 (transfers involving multiple dwellings).

- (3) The amendments made by this Resolution have effect in relation to land transactions the effective date of which falls on or after 1 June 2024.
- (4) But those amendments do not have effect in relation to a land transaction if—
  - (a) the transaction is effected in pursuance of a contract entered into and substantially performed before 1 June 2024, or
  - (b) the transaction is effected in pursuance of a contract entered into on or before 6 March 2024 and is not excluded.
- (5) For this purpose a land transaction is excluded if—
  - (a) there is any variation of the contract, or assignment of rights under the contract, after 6 March 2024,
  - (b) the transaction is effected in consequence of the exercise after that date of any option, right of pre-emption or similar right, or
  - (c) 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.
- (6) If—

- (a) pre-commencement land transactions are linked to post-commencement land transactions, and
- (b) all of the transactions would (but for this Resolution) be relevant transactions for the purposes of Schedule 6B to the Finance Act 2003,

a claim under that Schedule is available only in relation to the pre-commencement land transactions.

- (7) If a claim under that Schedule is made in relation to those transactions, none of the post-commencement land transactions are to be regarded any longer as linked to any of the pre-commencement land transactions for the purposes of Schedule 6B to the Finance Act 2003 and all other purposes of Part 4 of that Act.

- (8) For this purpose—

“pre-commencement land transactions” means land transactions the effective date of which falls before 1 June 2024 or which meet the condition in paragraph (4)(a) or (b), and

“post-commencement land transactions” means all other land transactions.

- (9) The amendments made by this Resolution also do not have effect in relation to land transactions the effective date of which falls on or after 1 June 2024 if they fall within a

description of land transactions specified in regulations made by the Treasury (irrespective of the date on which the regulations are made).

- (10) The regulations may make provision of a kind mentioned in section 114(6)(a) to (c) of the Finance Act 2003 but may not be made on or after 1 February 2025.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

8. Stamp duty land tax (first-time buyers' relief: new leases acquired on bare trust)

That—

- (1) Schedule 6ZA to the Finance Act 2003 (relief for first-time buyers) is amended as follows.

- (2) In Part 1 (eligibility for relief), after paragraph 3 insert—

*“Eligibility for relief: acquisition of new lease on bare trust*

3A In determining who is the purchaser for the purposes of paragraphs 1(4) and 2(2), paragraph 3 of Schedule 16 is to have effect as if sub-paragraphs (2) and (3) (trustee of bare trust granted a lease treated as purchaser

of the whole of the interest acquired) were omitted.”

- (3) In paragraph 6 (definition of “first-time buyer”), at the end insert—

“(3) In determining any question for the purposes of sub-paragraph (1), paragraph 3 of Schedule 16 is to have effect as if sub-paragraphs (2) and (3) (trustee of bare trust granted a lease treated as purchaser of the whole of the interest acquired) were omitted.”

- (4) The amendment made by paragraph (2) has effect for the purposes of claims for relief under paragraph 1 of Schedule 6ZA to the Finance Act 2003 made in relation to any land transaction the effective date of which falls on or after 6 March 2024.

- (5) The amendment made by paragraph (3) also has effect for the purposes of claims for relief under that paragraph made in relation to any land transaction the effective date of which falls on or after that date unless—

- (a) the transaction is effected in pursuance of a contract entered into on or before that date, and
- (b) the transaction is not excluded,

- (6) For this purpose a land transaction is excluded if—
- (a) there is any variation of the contract, or assignment of rights under the contract, after 6 March 2024,
  - (b) the transaction is effected in consequence of the exercise after that date of any option, right of pre-emption or similar right, or
  - (c) 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.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

## 9. Stamp duty land tax (registered providers of social housing)

That—

- (1) Section 71 of the Finance Act 2003 (certain acquisitions by registered social landlord) is amended as follows.
- (2) In the heading, for “registered social landlord” substitute “registered providers of social housing etc”.

- (3) In subsection (1), for paragraph (a) substitute—
- “(a) the purchaser is a non-profit registered provider of social housing controlled by its tenants,”.
- (4) In subsection (1A)—
- (a) for paragraph (b) substitute—
- “(b) a housing association registered in the register maintained under Article 14 of the Housing (Northern Ireland) Order 1992 (S.I. 1992/1725 (N.I. 15)), or
- (c) an English local authority that is a registered provider of social housing.”, and
- (b) omit the “or” after paragraph (a).
- (5) In subsection (2) for “relevant housing provider”, in each place it occurs, substitute “non-profit registered provider of social housing”.
- (6) In subsection (3)—
- (a) omit paragraphs (b) and (e) to (g), and
- (b) for paragraph (h) substitute—
- “(h) the Department for Communities in Northern Ireland, or”.
- (7) In subsection (4), omit paragraphs (b) and (d) (but not the “or” after paragraph (d)).
- (8) In subsection (5)—



- (a) after “means” insert “—
    - (a) any amount that is receipts of the disposal of social housing, provided the purchaser is entitled to use the amount for the purpose of the provision of social housing, or
    - (b)”, and
  - (b) in paragraph (b) (which is a result of the previous amendment), omit the words from “within” to the end.
- (9) After subsection (5) insert—
- “(6) In subsection (5) “social housing” has the meaning it has in Part 2 of the Housing and Regeneration Act 2008 (see, in particular, section 68 of that Act).
  - (7) In this section “English local authority” means—
    - (a) a principal council within the meaning of the Local Government Act 1972, or
    - (b) the Common Council of the City of London.”
- (10) In section 121 of the Finance Act 2003 (minor definitions), omit the definition of “registered social landlord”.

- (11) In section 122 of that Act (index of defined expressions), omit the entry for “registered social landlord”.
- (12) The amendments made by this Resolution have effect in relation to land transactions the effective date of which falls on or after 6 March 2024.
- (13) In consequence of those amendments, in section 150 of the Finance Act 2013 (annual tax on enveloped dwellings: relief for providers of social housing etc)—
  - (a) in subsection (2)(a)—
    - (i) for “relevant” substitute “qualifying”, and
    - (ii) omit the words from “(that” to “landlord)”,
  - (b) in subsection (3), for “relevant”, in each place it occurs, substitute “qualifying”, and
  - (c) for paragraphs (a) to (c) in subsection (4) substitute—
    - “(a) subsection (2) of section 71 of FA 2003 applies in relation to a reference to a qualifying housing provider controlled by its tenants as it applies to a reference in that section to a non-profit registered provider of social housing controlled by its tenants;
    - (b) “qualifying body” means—

- (i) anything described as a qualifying body in subsection (3) of that section,
  - (ii) the Scottish Ministers,
  - (iii) a council constituted under section 2 of the Local Government etc. (Scotland) Act 1994, or
  - (iv) Scottish Homes;
- (c) “public subsidy” means—
- (i) anything that is a public subsidy for the purposes of section 71 of FA 2003, and for the purposes of this section the reference in subsection (5)(a) of that section to “the purchaser” is to be treated as a reference to P or the qualifying housing provider (as the case may be);
  - (ii) any grant or other financial assistance under section 18 of the Housing Act 1996 (c. 52) (social housing grants);
  - (iii) any grant or other financial assistance under section 2 of the Housing (Scotland) Act 1988 (c. 43) (general functions of the Scottish Ministers);

- (d) “qualifying housing provider” means—
- (i) a relevant housing provider (within the meaning of section 71 of FA 2003),
  - (ii) a body registered as a social landlord in a register maintained under section 1(1) of the Housing Act 1996 (Welsh registered social landlords), or
  - (iii) a body registered under section 20(1) of the Housing (Scotland) Act 2010 (asp 17) (Scottish registered social landlords).”

(14) Paragraph (13) comes into force on 6 March 2024.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

## 10. Stamp duty land tax (purchases by public bodies)

That—

- (1) In paragraph 3 of Schedule 4A to the Finance Act 2003 (application of the higher rate of 15% to transactions where purchaser is a company etc)—

- (a) in sub-paragraph (3)(a) and (b), after “company” insert “but is not a public body”, and
  - (b) in sub-paragraph (4), at the end insert “and, for the purposes of that sub-paragraph, whether a person is a public body is to be determined in accordance with section 66”.
- (2) The amendments made by this Resolution have effect in relation to land transactions the effective date of which falls on or after 6 March 2024.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

#### 11. Inheritance tax (agricultural property relief and woodlands relief)

That provision may be made for the purposes of inheritance tax restricting agricultural property relief and woodlands relief to land in the United Kingdom.

#### 12. Corporation tax (charge and main rate for financial year 2025)

That (notwithstanding anything to the contrary in the practice of the House relating to the

matters that may be included in Finance Bills) provision may be made—

- (a) for corporation tax to be charged for the financial year 2025, and
- (b) for the main rate of corporation tax for that year to be 25%.

### 13. Corporation tax (standard small profits rate and fraction for financial year 2025)

That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made—

- (a) for the standard small profits rate to be 19% for the purposes of Part 3A of the Corporation Tax Act 2010 for the financial year 2025, and
- (b) for the standard marginal relief fraction to be  $\frac{3}{200}$ ths for those purposes for that year.

### 14. Credit for low-budget British films

That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made amending Part 14A of the Corporation Tax Act 2009 so as to provide for the payment of credits in respect of expenditure by companies on the production of films which have a budget not exceeding a

specified maximum and which have a specified connection to the United Kingdom.

#### 15. Theatre tax credit

That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made taking effect in a future year increasing the rates specified in section 1217K(4)(a) and (b) of the Corporation Tax Act 2009 to 45% and 40% respectively.

#### 16. Orchestra tax credit

That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills) provision may be made taking effect in a future year increasing the rate specified in section 1217RG(4) of the Corporation Tax Act 2009 to 45%.

#### 17. Museums and galleries exhibition tax credit

That (notwithstanding anything to the contrary in the practice of the House relating to the matters that may be included in Finance Bills)—

(a) provision may be made omitting paragraph (c) of section 1218ZCG(1) of the Corporation Tax Act 2009 (date before which qualifying expenditure must be incurred), and

(b) provision may be made taking effect in a future year increasing the rates

specified in section 1218ZCH(4)(a) and (b) of that Act to 45% and 40% respectively.

18. Energy (oil and gas) profits levy (energy security investment mechanism)

That provision may be made for the energy (oil and gas) profits levy to cease to apply if the average prices of oil and gas over a specified period are at or below the average of those prices over the period of 20 years ending with 31 December 2022.

19. Collective investment schemes (unauthorised co-ownership schemes)

That provision may be made conferring power on the Treasury to make regulations applying any provision made in connection with authorised co-ownership schemes so that it applies (with or without modifications) in connection with unauthorised co-ownership schemes which meet specified conditions.

20. Economic crime (anti-money laundering) levy (amount of charge)

That provision may be made amending section 54(2)(c) of the Finance Act 2022 (amount of charge in case of persons whose UK revenue



is very large) by substituting “£500,000” for “£250,000”.

## 21. Transfer of assets abroad (closely-held companies)

That provision may be made amending Chapter 2 of Part 13 of the Income Tax Act 2007 to deal with cases where assets are transferred by closely-held companies.

## 22. Value added tax (late payment interest and repayment interest)

That—

- (1) In Part 2 of Schedule 54A to the Finance Act 2009 (further provision as to late payment interest and repayment interest)—
  - (a) in paragraph 5 (interpretation) omit the definition of “VAT credit”,
  - (b) in paragraph 7 (conditions for recovery of certain amounts of repayment interest), in sub-paragraph (1), for “on a VAT credit” substitute “in respect of an amount that is, or relates to, value added tax”, and
  - (c) in paragraph 8 (common period rules for value added tax)—
    - (i) in sub-paragraph (2), for paragraphs (a) and (b) substitute—

- “(a) an amount (“the overdue payment”) that is, or relates to, value added tax—
    - (i) is due and payable by the person, and
    - (ii) carries late payment interest, and
  - (b) an amount (“the relevant amount”) that is, or relates to, value added tax—
    - (i) is payable to the person, and
    - (ii) carries repayment interest.”,
  - (ii) in sub-paragraph (3), in the words before paragraph (a), for “During” substitute “In respect of”,
  - (iii) in paragraphs (a) and (b) of that sub-paragraph, for “VAT credit”, in each place it occurs, substitute “relevant amount”, and
  - (iv) after sub-paragraph (3) insert—
- “(4) An amount of repayment interest that—
- (a) has been paid to a person, but
  - (b) as a result of sub-paragraph (3)(b), ought not to have been paid,
- may be recovered from the person as if it were late payment interest.”

(2) The amendments made by this Resolution come into force on 6 March 2024.

And it is declared that it is expedient in the public interest that this Resolution should have statutory effect under the provisions of the Provisional Collection of Taxes Act 1968.

### 23. Value added tax (other minor amendments)

That provision may be made amending—

- (a) section 35 of the Value Added Tax Act 1994 (refund of VAT to persons constructing certain buildings) in relation to the evidence for claims for refunds of value added tax,
- (b) section 50 of that Act (terminal markets) so as to clarify the powers of the Treasury under that section, and
- (c) Schedule 54A to the Finance Act 2009 (late payment interest and repayment interest) so as to give effect to the amendments made by the preceding Resolution in relation to times before 6 March 2024.

### 24. Collective money purchase schemes

That provision may be made about the treatment under Part 4 of the Finance Act 2004 of—

- (a) sums or assets transferred from a collective money purchase scheme in the course of its winding up, and
- (b) benefits provided from sums or assets transferred as mentioned in paragraph (a).

## 25. Incidental or consequential provision

That provision (including provision having retrospective effect) may be made which is incidental to, or consequential on, provision authorised by any other Resolution.

**FINANCE (MONEY): *King's recommendation signified***

That, for the purposes of any Act of the present Session relating to finance, it is expedient to authorise the payment out of money provided by Parliament of any expenditure incurred by the Commissioners for His Majesty's Revenue and Customs or the Secretary of State which is attributable to provision made for credits to companies in respect of expenditure on the production of films which have a budget not exceeding a specified maximum and which have a specified connection to the United Kingdom.

