

Rollover relief on certain investment property (S-600A)

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This manual should be read in conjunction with Section 600A of the Taxes Consolidation Act 1997

Rollover relief on certain investment property

Relief under Section 600A was discontinued for disposals on or after 4 December 2002. Gains arising on disposals before that date may continue to be “rolled over” while the vendor continues to invest the consideration for subsequent disposals of qualifying premises in replacement qualifying premises.

Section 600A provides for rollover relief from 5 January 2001 in respect of certain investment property. The property must be a residential property in respect of which the person is entitled to receive a rent.

It must contain one or more (at least three for disposals prior to 1 January 2002) separate residential units and must comply with certain Housing Regulations. The relief provides that no capital gains tax is payable where the proceeds from the sale of the property are reinvested in another residential investment property which has at least the same number of separate residential units, but not less than three, as the property which was sold. Instead, the gain is deferred until such time as the replacement premises is disposed of.

The same conditions which apply to the rollover relief for trading assets (Section 597) apply to the relief for investment property. The principal conditions are that the replacement property must be acquired in the period one year before and three years after the disposal of the original property. Partial relief is available where the property was not a “qualifying” property throughout the whole period of ownership by the person.