



Property business structuring

In today's market, it is likely that a significant number of your clients will hold (or find themselves holding) at least one investment property.

However, the various tax changes introduced by the government have meant that finding a tax efficient way to hold investment properties, or to structure property businesses, is not always easy.

Being a 'hot topic' area, tax advice in relation to structuring property investment business' is a crowded and competitive marketplace. ETC Tax have significant experience in helping clients with many different scenarios to structure their property businesses tax efficiently to achieve their individual objectives.

Capital allowances

There are certain events which should always prompt property owners and/or potential purchasers of property to seek to fully understand the position with regards to capital allowances. These events include, but are not limited to:

- Buying/selling a 'second-hand' property
- Purchasing a 'brand new' property from a developer
- Extensions, alterations or refurbishments of existing buildings
- Fit outs of property including leasehold improvements
- Other construction projects

Capital allowances can often make a significant difference to the overall value of the transaction, but maximising a claim for capital allowances often requires expertise in reviewing both the property itself and the contractual arrangements. ETC Tax can assist with this.

Property development

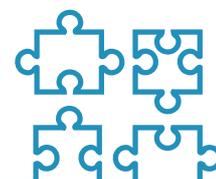
ETC Tax have experience of advising both UK property developers and those based overseas, ensuring that ownership structures are tax-efficient and meet the commercial needs of those individual's businesses.

We also offer specialist experience in large-scale overseas property developments. For example, we have recently provided tax advice on the creation of an investment structure for a US hotel complex looking to raise capital and targeting UK resident investors.

SDLT

What started out as a relatively simple tax on the acquisition of an interest in land, has, over recent years become fraught with complexity, to the point where we now find ourselves in a position where we have five different charging structures for SDLT.

ETC Tax are able to help you to help you determine the appropriate SDLT analysis applying to your client's transaction, and to give you confidence that the SDLT that your client is paying is the correct amount of SDLT. We are also happy to review or consider historic land transactions where there is doubt over the SDLT analysis applied at that time.





Tax on your own home

Whilst many of the property tax issues we are asked to consider arise from property investment or property development, there are also a number of tax issues that present in relation to an individual's own home. Very often these are issues arising from multiple home ownership such as capital gains on a second property, PPR or similar.

However, clients might also find themselves in a position where they are looking for ways to get increased value from their own home; for example, they may be disposing of part or all of the land surrounding their home, (whether for development, or for other commercial use); or perhaps letting part of their property out for commercial purposes. Many of these issues require careful thought.

VAT on property

Some of the most complicated VAT rules apply to property transactions. ETC Tax have a wealth of experience working with property investors and developers, as well as property contractors to ensure that the best possible outcome is achieved. Involving a tax specialist at an early stage – for example in our reviewing plans or proposals is often the best way of ensuring that the best use is made of available VAT reliefs and procedures.



For further information please contact ETC Tax on
0161 711 1320 or email us at enquiries@etctax.co.uk

