

# Lecture Analysis June 2019

## PERSONAL TAX

### **P1136 Personal tax round up (19.10 minutes)**

Dean Wootten provides us with a summary of a number personal tax cases including vehicle benefits, personal and managed service companies, pension entitlement and a significant failed discovery case for HMRC.

### **P1137 Exemption for expenses related to travel (14.02 minutes)**

Robert Jamieson reminds us of the rules relating to the payment of benchmark subsistence rates and highlights how this has changed under Finance Act 2019.

### **P1138 IHT planning – Using family trusts to gift buy to lets (11.57 minutes)**

Dean Wootten explains how nil rate band trusts can be used to mitigate future IHT liabilities that could arise on a portfolio of buy to let properties and what such actions mean for CGT, Stamp Duty Land Tax and income tax.

### **P1139 Using related settlements (20.32 minutes)**

Robert Jamieson refreshes our memory on what a pilot trust is and why they are less popular before moving on to consider an alternative tax planning opportunity that arises due to a flaw in the related settlements legislation

### **P1140 Meaning of Dwelling for SDLT (13.44 minutes)**

Robert Jamieson talks about an interesting First Tier Tribunal case that initially resulted in a five-fold increase in Stamp Duty Land Tax becoming payable. The case could have interesting repercussions for CGT and IHT.

## BUSINESS TAX

### **B1136 Business tax round up (17.18 minutes)**

Dean Wootten takes a look at a couple of recent entrepreneurs' relief cases, what is happening with the MTD income tax pilot scheme and concludes by considering a number of recent VAT cases.

### **B1137 Corporate intangible fixed assets (6.39 minutes)**

Robert Jamieson explains a change to the intangible degrouping charge rules where the gain on a company being sold qualifies for the substantial shareholding exemption.

### **B1138 HMRC going against the grain (21.00 minutes)**

Robert Jamieson discusses a recent case that considers whether a farmer's grain silo constituted plant for capital allowances purposes.

### **B1139 Sale of Goodwill (17.07 minutes)**

Robert Jamieson takes a look at First Tier Tribunal case where a taxpayer sold his business claiming entrepreneurs' relief but where HMRC tried to tax his proceeds as income.

### **B1140 Agent or principal? (13.39 minutes)**

Neil Warren considers the question of who is an agent and who is the principal in a three party arrangement, an area that has become more challenging with so many transactions now taking place over the internet.