

# Autumn Statement - Property Tax Update

## Summary of the Announcements and Changes

### “Investing for Growth & Protecting Business”

ALUN OLIVER FRICS, Managing Director of E<sup>3</sup> Consulting, discusses the initial reaction to the Property Taxation aspects of the ‘Autum Statement’ announced today (22 November 2023) by Jeremy Hunt MP, Chancellor of the Exchequer.



This review highlights the measures impacting the built environment as well as the wider property, construction and infrastructure sectors.

These are largely drawn from the Autum Statement ‘Green Book’ and will be augmented, over the coming days as further explanations, commentary and/or draft legislation become available.

There was much anticipation and sustained ‘briefing’ on tax savings and support for business and the announcements are broadly welcomed with a number of measures to support UK businesses and the wider UK economy, including reductions to National Insurance, Business rates relief and extension to a number of the capital allowances including the extension to the time scales for Freeports and Investment Zones from five years to ten years. The only downside of the current ‘Full expensing’ 100% relief is that it only applies to Corporation Tax and so many businesses that operate as partnerships or individuals (such as farming, medical or dental practices etc., as well as those across professional services) - will not benefit from these accelerated tax savings as they are not available against Income Tax.

#### The measures include:

**4.7 At Spring Budget 2023** the government went further by introducing full expensing for three years from 1 April 2023 - a £27 billion Corporation Tax cut for companies investing in the UK - and undertook to make this tax cut permanent when fiscal conditions allowed.

**4.8 The government is honouring this now, by making full expensing permanent.** This reflects the government’s commitment to support businesses to invest, as well as to ensure the tax system is simple, stable and predictable.

**4.9 Companies across the UK will be able to write off (“fully expense”) the full cost of qualifying main rate plant and machinery investment in the year of investment,** supporting businesses to invest and grow. This means companies are rewarded with up to 25p off their tax bill for every £1 that they invest, which amounts to a tax cut of over £10 billion per year.

# Autumn Statement - Property Tax Update

## Summary of the Announcements and Changes

### “Investing for Growth & Protecting Business”

**4.10 This significant reform makes the UK’s capital allowances regime one of the most generous in the world**, and it boosts the UK to joint first among OECD countries in net present value terms. The UK’s low and internationally competitive Corporation Tax rate, combined with some of the world’s most generous investment incentives, will ensure the tax system encourages investment.

**4.11 Full expensing has long-term and wide-reaching economic benefits**, reducing the cost of capital for firms and boosting overall business investment by £3 billion a year according to the OBR. The additional investment increases GDP by 0.1% by the end of the forecast period, increasing further to slightly below 0.2% in the long run. The government has prioritised this business tax cut as it is the most effective tax measure to prioritise growth across all sectors of the economy, rewarding those that invest the most with lower taxes.

**4.12 Permanent full expensing**, including the 50% first-year allowance for special rate assets, will give companies certainty to plan long-term investments. This applies across the economy, including to the UK’s capital intensive green industries such as solar and offshore wind, which will also benefit from a new investment exemption from the Electricity Generator Levy. Permanent full expensing also provides further support for companies that want to decarbonise by investing in solar panels and heat pumps, and for companies that want to invest in newer, greener plant and machinery.

**4.13 The cash flow benefits of full expensing are particularly important** in a high interest rate environment when companies are facing higher costs, since cash up front has become even more valuable than a stream of future lower payments through Writing Down Allowances. Given that costs of the policy are much lower in the long-term, the government sees full expensing as an effective and targeted way of using the government’s balance sheet to increase investment in a fiscally sustainable way.

**4.14 The move to full expensing also provides us with an opportunity to permanently simplify capital allowances**. The government will therefore launch a technical consultation on wider changes to simplify the UK’s capital allowances legislation.

**4.15 Since Spring Budget, the government has been exploring the case for expanding the scope of full expensing to include assets for leasing with an industry working group**. The government will continue to carefully consider whether there is a case to do so and publish a technical consultation in due course to seek further input from a wider range of stakeholders.

**4.16 The government is committed to protecting and enhancing the UK’s energy security and maintaining competitiveness**. In recognition of this, alongside confirming the Energy Profits Levy will end no later than 31 March 2028, the government has published the conclusion to the review of the oil and gas fiscal regime and set out the final design of the Energy Security Investment Mechanism, including future adjustments to the mechanism’s price thresholds in response to inflation. This package will provide certainty and predictability for investors and operators in this crucial industry in the short-, medium- and long-term.

# Autumn Statement - Property Tax Update

## Summary of the Announcements and Changes

### “Investing for Growth & Protecting Business”

**4.17 The government is committed to supporting businesses with business rates bills.** Many larger retail businesses and large supermarkets benefitted from the 2023 business rates revaluation and the £13.6 billion package of support provided at Autumn Budget 2022, which together decreased total bills paid by the retail sector by an estimated 20% and large supermarkets by an estimated 15%. A third of properties in England have already been taken out of rates completely through Small Business Rates Relief, and the government has also frozen the tax rate for the last three years, extended the relief for Retail, Hospitality and Leisure (RHL) properties and removed downwards caps from Transitional Relief.

**4.18 The government will continue to make sure that support is offered to the small businesses,** high street shops and independent cafes and pubs that need it most. The small business multiplier will be frozen for another year, while the 75% RHL relief will be extended for 2024-25. The standard multiplier will be uprated in line with September’s CPI. These changes will take effect from 1 April 2024 in England. English Local Authorities will be fully compensated for the loss of income as a result of these business rates measures and will receive new burdens funding for administrative and IT costs.

**4.19 The government has chosen to prioritise measures that will boost investment and growth,** while not fuelling inflation. While this means that business rates bills will go up for some, these increases will be far outweighed by the benefits of full expensing for companies that invest. For example, HM Treasury estimates that while inflation uprating of the multiplier will result in an increase of £250 million or 6.4% in business rates paid by the retail sector in 2024-25, the sector could benefit from full expensing by around £1 billion per year. In addition, total bills paid by larger retail businesses and supermarkets will still be lower in 2024-25 than they were before the 2023 revaluation.

**4.20 The Government is committed to internationally competitive R&D tax reliefs.** Following consultation, the current R&D Expenditure Credit (RDEC) and SME schemes will be merged from April 2024 onwards, simplifying the system and providing greater support for UK companies to drive innovation. The rate at which loss-making companies are taxed within the merged scheme will be reduced from 25% to 19%. The intensity threshold in the R&D intensives scheme will also be reduced from 40% to 30% for accounting periods that start on or after 1 April 2024, allowing around 5,000 extra SMEs to qualify for an enhanced rate of relief.<sup>24</sup> A one year grace period will also be introduced, providing certainty for companies who dip under the 30% threshold that they will continue to receive relief for one year. Taken together, these changes will provide £280 million of additional relief per year by 2028-29 to help drive innovation in the UK.

**4.21 Delivering high quality infrastructure** is crucial for boosting economic growth and productivity across the UK and is an essential foundation for increasing energy security and transitioning to net zero. This means addressing barriers to investment such as the UK’s outdated planning system and lengthy delays to connect to the electricity grid; and making the economic regulatory framework more pro-investment.

**4.22 Reforming the UK’s planning system** is crucial to ensuring there is investment in the essential infrastructure and commercial development needed for growth. The government will

# Autumn Statement - Property Tax Update

## Summary of the Announcements and Changes

### “Investing for Growth & Protecting Business”

progress the National Infrastructure Commission’s (NIC) April recommendations on planning by delivering reforms to return the Nationally Significant Infrastructure Project regime to the two and a half year average consenting time achieved in 2012.

As set out in ‘Getting Great Britain building again: speeding up infrastructure delivery’ policy paper, the government’s active reform agenda to deliver this ambition includes publishing spatial data on major infrastructure projects for the first time and ensuring a more reliable process

for updating National Policy Statements, further to the updates to the National Networks and Energy National Policy Statements that will be designated in the coming months.<sup>27</sup>

4.23 Alongside reforms to deliver infrastructure quicker, the government will strengthen the capacity of the planning system to deliver a better service for businesses, including introducing new premium planning services across England with guaranteed accelerated decision dates for major applications and fee refunds wherever these are not met. These services will improve the existing patchwork approach of Planning Performance Agreements. The government will also invest £5 million to incentivise greater use of Local Development Orders in England, to end delays for businesses so that key commercial projects secure planning permission faster.

4.24 The government is also creating more certainty for investors in low-carbon infrastructure by extending the critical national priority designation for nationally significant low-carbon energy projects. Alongside this, the government will look to remove unnecessary planning constraints by accelerating the expansion of electric vehicle (EV) charging infrastructure and will consult on amending the National Planning Policy Framework to ensure the planning system prioritises the rollout of EV chargepoints, including EV charging hubs. It will also consult on introducing new permitted development rights to end the blanket restriction on heat pumps one metre from a property boundary in England. Together these measures will reduce delays and capitalise on the UK’s world-leading approach to decarbonising the economy.

4.25 Substantive action is required to address the lengthy wait to connect to the electricity grid. These delays limit investment in the transition to low-carbon power generation, which is critical to the UK’s energy security. The government is therefore announcing reform of the grid connection process to cut waiting times, including freeing up over 100GW of capacity so that projects can connect sooner. This will help to enable the significant majority of projects to get their requested connection date with no wait and, for viable projects, reduce overall connection delays from five years to no more than six months.<sup>28</sup>

**4.96 At Spring Budget 2023, the government launched the refocused Investment Zones programme.** The government is now going further by extending the Investment Zones programme from five to ten years, which will double the envelope of funding and tax reliefs available in each Investment Zone from £80 million to £160 million, to provide greater certainty to investors. The government is also extending the duration of the tax reliefs available in Freeports from five to ten years to maximise the programme’s impact. To ensure Investment Zones and Freeports can respond nimbly as investment opportunities arise, the government is also creating a new £150 million Investment Opportunity Fund, which will be available over five years.

# Autumn Statement - Property Tax Update

## Summary of the Announcements and Changes

### “Investing for Growth & Protecting Business”

#### 4.97 The government is also announcing the next set of Investment Zones.

- The Greater Manchester Investment Zone will focus on advanced manufacturing and materials and local partners expect it to help to leverage £1.1 billion in private investment and help to create 32,000 jobs in the region over the next 10 years.
- The West Midlands Investment Zone will focus on advanced manufacturing and local partners expect it to help to leverage £2 billion in private investment and help to create 30,000 jobs in the region over the next 10 years.
- The East Midlands Investment Zone, with a focus on green industries and advanced manufacturing, is expected by local partners to help to leverage £383 million in private investment and help to create 4,200 jobs in the region over the next 10 years.

All of these Investment Zones have received anchor investment from private sector companies.

**4.98 The government continues to make good progress on developing the Investment Zones for the North East and Tees Valley.** The government is also confirming that there will be two Investment Zones in Wales; one located across the Cardiff and Newport area, and delivered by the South East Wales Corporate Joint Committee, and another focusing on the Wrexham and Flintshire region delivered by the North Wales Corporate Joint Committee. The government has now confirmed details of 6 of 13 Investment Zones in the UK and will work with local partners with the aim of confirming details of all Investment Zones by summer 2024.

**4.99 To deepen devolution in England and further empower local leaders** to drive growth in their areas, the government has agreed with local partners a Memorandum of Understanding outlining the approach to the single funding settlements which will be implemented at the next Spending Review for the West Midlands and Greater Manchester Combined Authorities. The government is also publishing a new ‘Level 4’ of the devolution framework. Devolved institutions with a directly elected leader that meet eligibility requirements will be able to draw down from this framework, which delivers deeper powers alongside new scrutiny expectations. The powers include new levers over local transport, reflecting the substantial progress made towards the National Infrastructure Commission’s recommendation to devolve local transport powers and funding to local authorities. The government has already agreed to negotiate a further trailblazer devolution deal with the North East and discussions have now commenced with a view to finalising a deal in spring 2024. The deal will empower local leaders to develop existing and potential industrial strengths across the region, from creative industries to advanced manufacturing.

**4.100 The government is also announcing four new devolution deals** and an intention to expand Level 2 devolution to eligible councils across England that represent a whole county or functional economic area. This includes new Level 3 deals with Greater Lincolnshire, and Hull and East Yorkshire, and Level 2, non-mayoral, deals with Cornwall and Lancashire. Combined, these new deals, and the extended Level 2 offer, could increase the proportion of people in England benefiting from devolved powers to over two-thirds.

# Autumn Statement - Property Tax Update

## Summary of the Announcements and Changes

### “Investing for Growth & Protecting Business”

4.101 Building on this support for growth across the UK, the government is announcing:

- £80 million for the expansion of the Levelling Up Partnerships programme to Scotland, for Na h-Eileanan an Iar, Argyll and Bute, Dundee, and the Scottish Borders, and will consider how to extend the programme further;
- over £50 million to support regeneration in places across the UK: Bolsover, the Isles of Scilly, Warrington, North Norfolk, Eden and Monmouthshire;
- support for the Hay festival in Wales;
- the reallocation of £20 million from within the Inverness & Highland City Region Deal to fund essential landside infrastructure improvements for the Corran Ferry, subject to agreement through the appropriate Deal governance structures; and
- confirming £3 million for the Tackling Paramilitarism Programme in Northern Ireland.

**4.102 Building homes in the right places**, where people want to live and work, will support economic growth across the UK and make home ownership a reality for more people.

**4.103 The government is investing an additional £32 million** across housing and planning to unlock thousands of homes across the country. This includes additional funding to tackle planning backlogs in Local Planning Authorities (LPA), alongside further reforms to streamline the system through a new Permitted Development Right to enable one house to be converted into two homes.

**4.104 Funding will also accelerate the delivery of new high quality housing** in Cambridge, Leeds and London. As part of this, the government will support the Cambridge Delivery Group to drive the long-term vision for Cambridge by exploring the case for a development corporation. The government is also continuing to progress its commitment to deliver East West Rail, with a statutory consultation due next year and, as part of Network North, has committed to providing £2.5 billion for a West Yorkshire mass transit system. Subject to the business case, the government will also provide funding for a rapid transit bus network in Thamesmead, as part of its vision for a new Docklands 2.0.

**4.105 Today the government is also confirming £110 million will be made available through the Local Nutrient Mitigation Fund.** This will support LPAs affected by nutrient neutrality rules to deliver high quality local nutrient offsetting schemes, unlocking up to 40,000 homes over the next five years. The government is also simplifying the tax system for large businesses. Tax professionals have welcomed the simplicity of full expensing that was due to come to an end in March 2026, and the government has announced that this will be made permanent. The government will take this opportunity to determine how the capital allowances legislation could be simplified in consultation with industry. Tax simplification is an ongoing priority for this government, and it will aim to demonstrate progress on this agenda at every fiscal event.

**5.62 Capital allowances: permanent full expensing** - Full expensing will be made permanent in the Autumn Finance Bill 2023, so that investments made by companies in qualifying plant and machinery, after 1 April 2026, will continue to qualify for a 100% first-year allowance for main rate assets, and a 50% first-year allowance for special rate (including long life) assets. Cars, assets for leasing and second-hand assets will be excluded from these 100% and 50% first-year allowances.

# Autumn Statement - Property Tax Update

## Summary of the Announcements and Changes

### “Investing for Growth & Protecting Business”

**5.63 Capital allowances: Technical consultation on extending full expensing to assets for leasing** - Assets for leasing remain excluded from full expensing. The government will continue to consider whether there is a case to extend full expensing to leasing. The government will publish a technical consultation in due course to seek input on draft legislation which will help to determine whether error and abuse risks are appropriately mitigated. The government will consider consultation responses before reaching any final decision.

**5.64 Business rates: multiplier** - For 2024-25, the small business multiplier in England will be frozen for a fourth consecutive year at 49.9p, while the standard multiplier will be updated by September CPI to 54.6p.

**5.65 Business rates: retail, hospitality, and leisure relief** - The current 75% relief for eligible Retail, Hospitality and Leisure (RHL) properties is being extended for 2024-25, a tax cut worth £2.4 billion. Around 230,000 RHL properties in England will be eligible to receive support up to a cash cap of £110,000 per business.

**5.66 New Burdens Funding - English Local Authorities** will be fully compensated for the loss of income as a result of these business rates measures and will receive new burdens funding for administrative and IT costs.

**5.67 Stamp Duty and Stamp Duty Reserve Tax** - Widening access to the Growth Market Exemption - The government is extending the Growth Market Exemption, a relief from Stamp Duty (SD) and Stamp Duty Reserve Tax (SDRT), to include smaller, innovative growth markets. It will also increase the threshold for the market capitalisation condition that is used within the exemption from £170 million to £450 million. These changes will be included in the Autumn Finance Bill 2023 for implementation from 1 January 2024.

**5.71 Real Estate Investment Trusts (REITs)** - Further to the publication of draft legislation on 18 July 2023, the government will make amendments to the rules for Real Estate Investment Trusts (REITs) to enhance the competitiveness of the regime. Changes will variously take effect from Royal Assent of the Autumn Finance Bill 2023, apply to accounting periods ending on or after 1 April 2023, or are deemed to have always had effect.

**5.72 Merger of R&D tax reliefs** - The existing Research and Development Expenditure (RDEC) and SME schemes will be merged, with expenditure incurred in accounting periods beginning on or after 1 April 2024 to be claimed in the merged scheme. Merging schemes is a significant tax simplification, including an aligned set of qualifying rules and a more visible above the line credit. The notional tax rate applied to loss-makers in the merged scheme will be lowered from 25% as per the current RDEC scheme, to 19%. A note setting out the key changes to the policy following the technical consultation is published alongside the Autumn Statement, ahead of it being legislated for in the Autumn Finance Bill 2023.

**5.73 R&D tax reliefs: additional tax-relief for R&D intensive loss-making SMEs** - The intensity threshold in the additional support for R&D intensive loss-making SMEs will be reduced from 40% to 30%, bringing approximately 5,000 more R&D intensive SMEs into scope of the relief. The government will also introduce a one-year grace period, so that companies that dip under the 30%

# Autumn Statement - Property Tax Update

## Summary of the Announcements and Changes

### “Investing for Growth & Protecting Business”

qualifying R&D expenditure threshold will continue to receive relief for one year. Businesses will be able to claim for expenditure incurred from 1 April 2023 once the Autumn Finance Bill 2023 has received Royal Assent, with the reduction in intensity threshold and grace period coming into effect for accounting periods beginning on or after 1 April 2024.

**5.74 R&D tax reliefs:** removing nominations and voiding assignments - From 1 April 2024, R&D claimants will no longer be able to nominate a third-party payee for R&D tax credit payments, subject to limited exceptions. In addition, no new assignments of R&D tax credits will be possible from 22 November 2023. This means that in most circumstances payments of R&D tax reliefs will be paid directly to the company that claims for the R&D, ensuring they have full oversight of the claim, and receive payment more quickly. This will be legislated in the Autumn Finance Bill 2023.

**5.75 Closing the R&D review** - At Spring Budget 2021, the government launched a review of R&D tax reliefs to ensure the UK remains a competitive location for cutting edge research, the reliefs continue to be fit for purpose and taxpayer money is effectively targeted. The government is now concluding that review with the announcement of the merged scheme. Further action may be needed to reduce the unacceptably high levels of non-compliance in the R&D reliefs, and HMRC will be publishing a compliance action plan in due course. The government will also continue working with industry to develop the enhanced support for R&D intensive SMEs, and consider further simplifications.

**5.76 Enterprise Investment Scheme (EIS) and Venture Capital Trust (VCT) extension** - The government will legislate in the Autumn Finance Bill 2023 to extend the existing sunset clauses for the EIS and VCT from 6 April 2025 to 6 April 2035.

**5.77 Annual Tax on Enveloped Dwellings (ATED):** annual increase - The annual chargeable amounts for ATED will be updated by the September CPI figure of 6.7% for the 2024-25 ATED charging period. This updating is a routine change, as set out in existing primary legislation. The government will implement this change in the usual way through a Treasury Order.

**5.92 Infrastructure planning** - The government has published its response to the National Infrastructure Commission's study on infrastructure planning reforms, with measures to return consent times to two and a half years on average, is designating low carbon infrastructure as a critical national priority in updated Energy National Policy Statements, and will consult on amending the National Planning Policy Framework to ensure that the planning system prioritises the rollout of electric vehicle charging infrastructure, including EV charging hubs, and also introduce new permitted development rights to end the blanket restriction on heat pumps one metre from a property boundary in England.

**5.93 Planning system performance reforms** - The Department for Levelling Up, Housing and Communities will bring forward plans for authorities to offer guaranteed accelerated decision dates for major developments in England in exchange for a fee, ensuring refunds are given where deadlines are not met and limiting use of extension of time agreements. This will also include measures to improve transparency and reporting of planning authorities' records in delivering timely decision-making.



# Autumn Statement - Property Tax Update

## Summary of the Announcements and Changes

### “Investing for Growth & Protecting Business”

**5.94 Support for substantial commercial development** - The government will incentivise greater use of Local Development Orders to ensure key commercial developments are approved faster.

**5.149 Landfill Remediation Pathfinder** - The government is launching a £78 million competitive pilot fund to alleviate the cost of landfill tax where it is acting as a barrier to the remediation and redevelopment of contaminated land.

**5.152 Reforms to Energy-Saving Materials VAT Relief** - Following a call for evidence, the government will expand the VAT relief available on the installation of energy-saving materials by extending the relief to additional technologies - such as water-source heat pumps - and bringing buildings used solely for a relevant charitable purpose within scope. Thanks to the Windsor Framework, these reforms will be implemented UK-wide in February 2024. Full details on these reforms will be published shortly.

**5.163 Fleming Centre** - The government is granting £5 million to support establishment of the Fleming Centre to tackle the global fight against antimicrobial resistance (AMR).

**5.179 Business rates retention** - the government has agreed the detailed terms of the long-term business rates retention arrangements for the Greater Manchester and West Midlands Combined Authorities, delivering on the commitment in the trailblazer deals announced at Spring Budget 2023. These arrangements will commence from April 2024.

**5.181 Levelling Up Partnerships (LUPs) extension to Scotland** - The government, in collaboration with the Scottish Government, is announcing over £80 million of investment for the expansion of the Levelling Up Partnerships programme to Scotland, for Na h-Eileanan an Iar, Argyll and Bute, Dundee, and the Scottish Borders. The government will consider, as the programme develops, how to extend it further.

**5.182 Additional regeneration projects** - In addition to the recently announced Levelling Up Fund Round Three projects, the government is announcing £37.5 million to support regeneration in places across the UK. These are: the Isles of Scilly, Warrington, Monmouthshire, North Norfolk and Eden. All funding is subject to final checks, including subsidy control. Bolsover will also receive £15 million, ensuring that all Priority Places, as determined using the Levelling Up Need metrics set out in the Levelling Up White Paper, have benefited from levelling up funding. The government will also support the Hay Festival in Wales, and the reallocation of £20 million from within the Inverness & Highland City Region Deal to fund essential landside infrastructure improvements for the Corran Ferry, subject to agreement through the appropriate Deal governance structures. This will ensure the long-term sustainability of the lifeline service.

**5.183 Barrow Delivery Board** - The government is announcing a new Delivery Board in Barrow-in-Furness, backed by £5 million of funding, to ensure local people see lasting benefits from investment in the Defence Nuclear Enterprise.

**5.184 Fund Simplification Implementation** - The recently announced funding simplification doctrine will come into force from January 2024. This is an important step to simplifying the local

# Autumn Statement - Property Tax Update

## Summary of the Announcements and Changes

### “Investing for Growth & Protecting Business”

government funding landscape, giving councils greater flexibility and freeing up resources for delivery.

**5.185 Local Finance Working Group** - The Department for Levelling Up, Housing and Communities will work with the UK Infrastructure Bank, the British Business Bank, Homes England and other departments to consider - with local and private sector partners - how to support levelling up through improving access to finance. The group will report to Ministers by the spring.

**5.186 Investment Zones Programme Extension** - The Investment Zones programme in England will be extended from five to ten years. Investment Zones will be provided with a £160 million envelope from 2024-25 to 2033-34 which can be used flexibly between spending and tax incentives, subject to ongoing co-design of proposals and agreement of delivery plans. The UK government will work in partnership with the Scottish and Welsh governments with the intention of delivering an extension to the Investment Zones programme in Scotland and Wales and continue to work with stakeholders on how best to deliver the benefits of the Investment Zones programme in Northern Ireland.

**5.187 Announcing Investment Zones** - Greater Manchester's Investment Zone will focus on advanced manufacturing and materials across Manchester, Salford, Rochdale, Bury, Oldham and the wider city region, with anchor investment from First Graphene, Kadant, Werit and Hydrograph worth over £10 million. West Midlands' Investment Zone will focus on advanced manufacturing across Birmingham, Wolverhampton and Coventry, with benefits felt across the wider region, with anchor investment from Bruntwood SciTech and Woodbourne Group worth £70 million in total and backed by over £5 million of investment into enabling digital platforms to support advanced manufacturing growth. East Midlands' Investment Zone will focus on advanced manufacturing and green industries across Nottinghamshire, Derby and Derbyshire with benefits felt across the wider region, with anchor investment from Rolls Royce and Laing O'Rourke worth £9.3 million. In addition to this, the government can confirm there will be two Investment Zones in Wales; one located across Cardiff and Newport, delivered by the South East Wales Corporate Joint Committee and another focusing on Wrexham and Flintshire delivered by the North Wales Corporate Joint Committee. The government will be working closely with the Welsh Government on the delivery of these Investment Zones.

**5.188 Investment Opportunity Fund** - The government is creating a £150 million fund to support Investment Zones and Freeports across the UK to secure business investment opportunities. The fund will be available over five years.

**5.189 Freeport Tax Relief Sunset Date Extension** - The window to claim Freeport tax reliefs will be extended from five to ten years, until September 2031 in English Freeports, conditional on agreement of delivery plans with each Freeport. The UK Government will work with the devolved administrations to agree how the 10-year window to claim reliefs can be extended to Freeports in Scotland and Wales.

**5.190 Freeports Delivery Roadmap** - The Department for Levelling Up, Housing and Communities will publish a Freeports Delivery Roadmap in December outlining the steps the government will take to ensure Freeports are best able to capitalise on the opportunity the extension presents.

# Autumn Statement - Property Tax Update

## Summary of the Announcements and Changes

### “Investing for Growth & Protecting Business”

**5.192 Cambridge, Leeds and London** - The government is announcing a further £2 million to address water scarcity in Cambridge, alongside £3 million to support the Cambridge Delivery Group drive the long-term vision for Cambridge by exploring the case for a development corporation. An additional £2 million in capacity funding will also be available for Leeds City Council to maximise delivery of new homes. Subject to business case approval, the government will also provide £23 million for a bus network to unlock housing in the ‘Docklands 2.0’ as part of the £150 million allocation to London from the Brownfield, Infrastructure and Land Fund.

**5.193 Planning capacity funding** - The government is investing £5 million in additional funding for DLUHC’s Planning Skills Delivery Fund for Local Planning Authorities to target application backlogs.

**5.194 Local Nutrient Mitigation Fund** - The government is providing £110 million of funding to support Local Planning Authorities to deliver high quality schemes to offset nutrient pollution, unlocking planning permissions that are otherwise stalled.

**5.195 Affordable Homes Guarantee Scheme** - The government is expanding the existing £3 billion scheme by a further £3 billion to support housing associations to access cheaper loans for quality and energy efficiency works as well as new homes.

**5.196 Housing Revenue Account rate extension** - The government is announcing a £5 million extension to June 2025 of the Public Works Loan Board policy margin announced in Spring 2023. This supports local authorities borrowing for Housing Revenue Accounts, and could provide savings and additional investment in social housing of as much as £150 million over the life of the borrowing.

The Chancellor announced over 100 new growth measures and some further consultations to improve the operation of different aspects of the economy - particularly extending the 100% capital allowances from ‘Full Expensing’ within finance leasing sector. There is a lot to digest but we will endeavour to clarify and expand on these announcements over the coming days and weeks as the details are published and set out how we can support you in optimising your property tax position in light of the Autumn Statement.

We are delighted that after much commentary on the woefully short periods initially set out for both Freeports and Investment Zones, these are now extended to ten years (to September 2031) meaning that investors within these areas now have a fighting chance to benefit from these tax savings and wider benefits, within each of these respective zones.

ALUN OLIVER BSc(Hons) MCIM MBA FRICS is Managing Director of Property Taxation Specialists, E<sup>3</sup> Consulting, and is also a CEDR accredited mediator. He has worked in property tax since 1994 and advises a wide range of clients from FTSE100 through to regional developers and family offices on Capital Allowances, CIL, Land Remediation Tax Relief, VAT and Repairs & Maintenance throughout the UK.

Email: [alun.oliver@e3consulting.co.uk](mailto:alun.oliver@e3consulting.co.uk). Tel: 0345 230 6450. [www.e3consulting.co.uk](http://www.e3consulting.co.uk)