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BIOGRAPHY

Anne is the knowledge development lawyer for Tax Advice & Controversy. She is responsible for developing and promoting technical know-how related resources for the group. This includes monitoring legal and market developments and analysing their potential impact on the work undertaken by the group. As part of this she is involved with tax policy development, regularly responding to Government consultations. She provides thought leadership, writes briefings, updates the firm's precedents and is responsible for organising the group's training.

She has advised on a range of corporate mergers and acquisitions, group reorganisations and joint ventures. She also has experience of real estate transactions.

PROFESSIONAL AFFILIATIONS

- International Fiscal Association
- Stamp Taxes Practitioners Group

ADMISSIONS

- England and Wales

RELATED PRACTICE AREAS

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- Tax & Private Client
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RELATED INSIGHTS

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Mar 06, 2024

Spring Budget 2024

It has been a busy Budget for the real estate sector today, particularly for the residential sector. The big announcement was the proposal to abolish SDLT's multiple dwellings relief ("MDR"). This came as a surprise and for those seeking to rely on the relief for a completion on or after 1 June 2024, they may have been racing to exchange today to lock in MDR on the acquisition. However, there was some good news for those trying to access the housing market. The government is proposing to withdraw the furnished holiday letting regime and reduce the higher rate of CGT for those who pay CGT on selling residential properties as these are intended to improve access to housing. But elsewhere reform for SDLT was relatively light. The government did not respond to lobbying in a few targeted areas. A downsizer's relief and keeping the current lower thresholds beyond March 2025 were not mentioned. In further good n...

Insights

Feb 29, 2024

Spring Budget 2024 – will we see material reform?

Budgets are normally stories of two halves. The first half contains the headline-grabbing tax policy reforms that can be encapsulated in a snappy soundbite in the Budget speech, such as "Chancellor scraps the non-dom regime". The second half typically contains more detailed reform packages, which may involve a significant overhaul of a regime past its sell by date, a complex new initiative or a tightening of a measure that doesn't work as well as it could. The latter could be viewed as the "business as usual" reform of the tax system, including to make it simpler and to make the UK more competitive. If the Autumn Statement is anything to go by, and particularly bearing in mind the timing of the next General Election, we can expect the Budget on 6 March to be

disproportionately focused towards the first half in the hope that carefully considered announcements will shift the dial on voting sentiment. We expect th...

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Nov 22, 2023

Impact of the UK's Autumn Statement 2023 on Real Estate

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Nov 08, 2023

Impact of Pillar Two on tax risk apportionment for a corporate sale

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Jul 25, 2023

REIT reform in the UK – further modernisation

The Government has announced a further series of proposed changes to the UK REIT rules as part of the wider review of the UK funds regime and published draft legislation. This third set of changes are earmarked for Finance Act 2024 and keep to the program of reform to modernise the REIT regime and generally to make it more accessible.

Insights

Mar 15, 2023

Spring Budget 2023 – tax impact on the real estate sector

Underneath the headline points, the Budget contained a number of measures designed to fulfil the Chancellor's objective of encouraging growth and investment. There was broadly good news for those investing in UK real estate. We look at some of the key announcements relevant to real estate below.

Insights

Feb 02, 2023

JPUTs may now need to be registered under the trust registration service

Some of the most commonly used trust structures in UK real estate ownership are Jersey Property Unit Trusts (JPUTs). It has become clear recently, following confirmation from HMRC, and HMRC now changing its published guidance, that the trust registration service (the TRS) can apply to JPUTs. If it applies, trustees will need to register the trust with HMRC under the TRS and keep records. Recent HMRC guidance had said neither authorised nor unauthorised unit trusts were required to be registered. Now HMRC's guidance says unauthorised unit trusts may need to register if they meet the general registration requirements (see below for the primary triggers for registration). It is not just those who are managing existing JPUT structures or setting up new JPUT structures who need to consider the TRS. Buyers of UK real estate where they are buying into the structure may also consider it, as will lenders t...

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Jan 19, 2023

Will the introduction of the PIF bring alternative fund formations back onshore in the UK?

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Jan 05, 2023

Delay to Luxembourg-UK treaty changes until 2024 at the earliest

The changes to the Luxembourg-UK treaty will not be effective until 2024 at the earliest because Luxembourg did not ratify the treaty changes in 2022. The delay was expected, as trailed in our earlier blog, where we explore the impact on the UK real estate sector.