

PRT CONFERENCES PRESENTS

PRIVATE CLIENT REAL ESTATE & HIGH VALUE ASSETS

Tuesday 29th November 2016
GRAY'S INN, LONDON

**HEAR FROM
LEADING EXPERTS**
FROM ONLY £299 plus VAT

SPEAKERS

Emma Chamberlain - Pump Court Tax Chambers
Nicholas Harries - Macfarlanes
Penelope Lang - Smith & Williamson
Toby Crooks - Rawlinson & Hunter
Simon Yeo - KPMG
Nigel Medhurst - Rawlinson & Hunter
Paul Harrison - Trident Tax

CHAIRMAN & SPEAKER
MICHAEL THOMAS, BARRISTER
PUMP COURT TAX CHAMBERS



CONFERENCE HIGHLIGHTS

- NEW DEEMED DOMICILE REGIME & IT'S IMPACT
- PLANNING FOR NON-RESIDENTS & REMITTANCES
- VAT ON HIGH VALUE ASSETS (ART, BOATS AND RESIDENTIAL PROPERTY)
 - HORSES & LANDED ESTATES
 - SELLING LAND
 - FULL SDIT UPDATE
- HMRC ENFORCEMENT & RISK MANAGEMENT UNDER THE NEW REGIMES

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8.45 - 9.20 WELCOME
(Tea, coffee and pastries)

9.20 - 9.30 CHAIRMAN'S INTRODUCTION

9.30 -10.20 THE NEW DEEMED DOMICILE REGIME

- New provisions on deemed domicile - how the 15 year rule really works
 - Losing deemed domicile - the difficulties of the tail
 - Transitional provisions for deemed domiciliaries - how to use them
 - Trusts and DD - the new regime
- Emma Chamberlain, Pump Court Tax Chambers*

10.20 -11.10 REMITTANCES: A REFRESHER

- What is remittance anyway?
 - Pre arrival planning problems
 - Investment and account management for remittance basis users
 - Business investment relief - the consultation
 - Relevant debt update
- Nicholas Harries, Macfarlanes*

11.10 - 11.30 BREAK
(Coffee, tea and biscuits)

- 11.30 - 12.15 HORSES & LANDED ESTATES**
- IHT reliefs and restrictions on losses
 - What is the mystique surrounding horses and tax?
 - When are horses taxable and when do HMRC try to take them out of the tax system?
 - Studs
 - Racing
 - Sports horses
 - Racing and trainers
 - VAT - the basics and the confusion
- Penelope Lang, Smith & Williamson*

12.15 - 13.05 NON-RESIDENT UPDATE

- Income Tax liability of non-UK trustees with UK resident beneficiaries - refresher
 - Potential tax charges on de-enveloping UK residential property
 - IHT implications for non-resident trustees and individuals post April 2017
 - Holding structures vs direct ownership for the non-resident private client
- Toby Crooks, Rawlinson & Hunter*

13.05 - 14.10 LUNCH

14.10 - 15.00 THE ESSENTIAL STAMP TAXES UPDATE

- Racing to incorporate property-rental businesses
 - * To de-envelope or not to, that is the question!
 - Beware of surcharge bear-traps!
 - * The super 15% SDLT rate RIP?
- Simon Yeo, KPMG*

15.00 - 15.50 VAT ON HIGH VALUE PRIVATE ASSETS

- VAT and residential property - accessing the lower rates for conversions and renovation works (and avoiding elephant traps)
 - Purchase/sale of artwork by the private collector
 - Effect of Brexit on the art market
 - Private yachts & aircraft
- Nigel Medhurst, Rawlinson & Hunter*

15.50 - 16.10 BREAK

16.10 - 17.00 SELLING LAND

- The new transactions in land rules: what's caught and how might HMRC apply them?
 - Collaboration and Land Pooling Agreements
 - Maximising entrepreneurs' relief and other CGT issues
 - Tax treatment of overage rights
 - Structuring joint venues
- Michael Thomas, Pump Court Tax Chambers*

17.00 – 17.30 HMRC ENFORCEMENT & ATTACKS

- New criminal offence
 - What is the likely impact of the consultation on penalising advisors in connection with failed avoidance?
 - Worldwide disclosure facility
 - Practical risk management
- Michael Thomas, Pump Court Tax Chambers and Paul Harrison, Trident Tax*

17.30 CONFERENCE CLOSES

The conference will be followed by a drinks reception.

EMMA CHAMBERLAIN

Emma is a private client barrister at Pump Court Tax Chambers, a member of the STEP Technical Committee and the CIOT Capital Taxes Committee. Emma is also a Council Member and fellow of CIOT. She is a member of the Interim General Anti-Abuse Advisory Committee that helped to produce the initial guidance and examples. She has also been co-author of "Trust Taxation and Estate Planning" (4th Edition), Sweet & Maxwell (August 2014) and co-editor of "Dymond's Capital Taxes". Emma is Special Advisor to the Parliamentary Treasury Select Committee and Advisor to HM Treasury and HMRC on trust matters.

NICHOLAS HARRIES

Nicholas is a partner in private client at Macfarlanes. He started his career as a barrister, practising from 10 Old Square, Lincoln's Inn (a leading set of traditional Chancery chambers). He subsequently spent two years in the private client department of PricewaterhouseCoopers, where he worked closely with Stephen Allcock QC before moving to Macfarlanes in 2003. He continues to hold Higher Courts rights of audience. His current practice allows him to draw on both the detailed trust law and drafting experience gained at the bar and the technical tax experience gained later in his career. It embraces the full range of tax, estate and succession planning advice for individuals resident in the UK (UK and non-UK domiciliaries). It also includes advice for internationally-based individuals and their families, even where there is no significant connection with the UK.

PENELOPE LANG

Penelope is a private client tax partner in Smith & Williamson dealing primarily with land based family businesses including having an expertise in taxation of bloodstock and competition horses. Penelope provides advice to a wide range of clients including to other professional firms. She uses her practical experience in the bloodstock and sports horse industry to advise proactively. She also works in conjunction with other professional advisers in relation to non UK residents and domicile investing in bloodstock in the UK. She is qualified as CA, CTA and TEP. She is a member of ICAS Private Client Tax Committee and of the Horseman Group TBA Tax Committee. She is also a List 1 Dressage Judge

TOBY CROOKS

Toby is a partner at Rawlinson & Hunter who specialises in the field of Private Client Tax, as part of the Trust & Wealth Services department. He enjoys working closely with clients, their legal advisers and Family Officers to understand their particular requirements and has a wide breadth of experience, having advised both UK and non-domiciled clients.

SIMON YEO

Simon is a senior manager in KPMG's stamp taxes team. He has specialised in SDLT at KPMG and PWC for 15 years, advising on the SDLT implications of all kinds of property purchases and restructurings for a range of clients, including private individuals, property funds, developers, local authorities, land estates and other investors as well as owner-occupiers. He is a member of the Stamp Duty Practitioners Group and is a frequent contributor to the tax press.

NIGEL MEDHURST

Nigel has over 30 years' experience in advising on VAT matters. As well as having a broad knowledge of this complex tax he has particular experience in VAT issues relating to Works of Art, Motor Sport, International Transactions, Land & Property, Financial Services, Aircraft and Yachts. He has successfully assisted in disputes with HM Revenue & Customs through to the High Court and regularly lectures on VAT matters. Nigel joined Rawlinson & Hunter in June 1996, after spending 9 years with a large international firm of Chartered Accountants heading a regional VAT Consultancy. Nigel had previously spent 13 years with HM Revenue & Customs (formerly HM Customs & Excise) dealing with VAT, Customs Duty and as an Investigation Officer looking into VAT and Customs Duty fraud. Nigel is a member of the Chartered Institute of Taxation and a member of the West End Chapter of the VAT Practitioners Group.

MICHAEL THOMAS

Michael is a barrister at Pump Court Tax Chambers. He has a broad practice and undertakes both litigation and advisory work. Michael has a particular interest in all aspects of real estate taxation. He sits on the Tax Committee of Country Landowners' Association and the VAT Committee of the British Property Federation. Chambers Bar Guide has said that he is "ahead of the game when it comes to property taxation."

PAUL HARRISON

Paul was a Partner at KPMG for over 17 years and joined Trident this year. He spent most of his time leading KPMG's UK Tax Investigations team, based in London, and led their largest and most complex client projects, covering multi-national companies and HiNWIs. Paul spent the first 9 years of his career at HMRC. On qualification as a Fully Trained Inspector he was a District Inspector, then Investigator and Officer in Charge at Special Compliance Office.

BOOKING FORM



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VENUE

The conference will be held in the Banqueting Area of Gray's Inn in central London. Refreshments, including a fantastic buffet lunch, will be provided by the Inn's renowned kitchens. Gray's is the most northerly of London's four iconic Inns of Court and is located just off High Holborn. The nearest tube is Chancery Lane and Holborn and Farringdon are both a few minutes walk away. Some parking may be available for delegates within the Inn itself. Given the quality of speakers and the low price we anticipate a very high demand for places and delegates are encouraged to book early to avoid disappointment.

ADMINISTRATION

- For all other correspondence including all enquiries please email us: info@prtconferences.com
- Joining instructions will be issued by email shortly before conference.
- Please contact us by email if you have not received either confirmation of your booking within 4 weeks of applying or joining instructions within 14 days before the event.
- If you would like to sponsor this conference then please email us.
- The event is not accredited for CPD purposes with any provider.

TERMS AND CONDITIONS

1. Fees must be paid in advance. Please send a cheque with the booking form to the address above. Bookings will not be confirmed until the full fee (inclusive of VAT) has been received.
2. Bookings will only qualify for the discounted rate if a cheque or BACs payment is received by 14th Oct 2016.
3. When a valid booking has been made and the fee received then we will acknowledge the booking by email and issue a VAT receipt.
4. The fee covers attendance on the day, refreshments, lunch and the paper documentation. Delegates are responsible for their own accommodation and travel arrangements.
5. Cancellations must be received in writing 21 days before the event. Refunds are at the sole discretion of the conference organisers and may be withheld if to do so would cause the organiser to suffer loss from its suppliers. Subject to that fees will normally be returned subject to a £90 administration fee per delegate. Substitute delegates may be sent (please inform us in advance if possible).
6. The organiser reserves the right to cancel the conference at its sole discretion. In this event all fees will be paid in full. The organiser will not be liable for any amounts in excess of the fees repaid.
7. The organiser reserves the right to change the venue, speakers or content should this become necessary for any reason.
8. The venue has a maximum capacity of 120. Places will be allocated on a first-come, first served basis and if the event becomes full then subsequent applications will be added to a waiting list.

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