Land Remediation Relief

Large Corporate **OMB**

22 August 2022

The CIOT has made a short proactive submission on the qualifying date for Land Remediation Relief for derelict land.

Land Remediation Relief (LRR) is available for the remediation of derelict land provided certain conditions are satisfied, including that the land has been derelict throughout the period beginning with the earlier of 1 April 1998 or the date of acquisition of a major interest in the land by the claimant company or a connected party.

The issue in practice is that providing confirmatory evidence of non-productive use for up to 24 years is very challenging, as records are unlikely to have been retained throughout the whole of such an extended period.

We suggest that in view of the time that has elapsed since the date of 1 April 1998 was fixed and given the practical difficulties in establishing non-productive use over a lengthy period, the date should be reviewed to ensure that the relief is meeting its objective.

The full CIOT submission is at www.tax.org.uk/ref966

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