



HM Revenue
& Customs

Aparna Nathan
Chair, CGT & Investment Income Sub-committee

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Dear Ms Nathan

Mixed Partnerships and s162 TCGA 1992

Thank you for your letter of 5 April 2016 addressing the changes in our view of mixed partnerships and the availability of relief under s162.

I confirm that our revised interpretation of the availability of s162 relief and mixed partnerships will apply to incorporations from 30 April 2016. As a consequence we do not consider grandfathering provisions necessary.

With regards to the second point in your letter concerning a specific statutory relief to allow s162 relief to apply to mixed partnerships on incorporation, I have referred this to my policy colleagues for their consideration.

I note that this matter will be addressed as part of your April meeting and I would be happy to discuss this further with you following that meeting if required.

Yours sincerely

Katherine Acton
Technical Adviser

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