

The background of the entire page is a close-up, artistic photograph of British currency. In the foreground, several coins are visible, including a 10p coin with the word 'TEN' and a 50p coin. Below the coins, a portion of a banknote is visible, showing the eyes of Queen Elizabeth II. The overall color palette is muted, with purples, greys, and the metallic tones of the coins.

# A Guide to **BUDGET** **2011**

Reforming the nation's economy, so that we  
have enduring growth and jobs in the future

- *Chancellor George Osborne*

# A Guide to Budget 2011

Welcome to 'A Guide to Budget 2011'. The Chancellor George Osborne presented his second Budget speech on 23rd March 2011. This was a fiscally neutral Budget, with the giveaways broadly balancing out the takeaways.

The Government's economic policy objective is to achieve strong, sustainable and balanced growth that is more evenly shared across the country and between industries. This Budget builds on action announced in the Spending Review 2010 and the June Budget 2010 to rebalance the economy from unsustainable public spending towards exports and investment.

Mr Osborne used a £2 billion surprise windfall tax on oil companies to cut the price of petrol in a Budget that also tried to set out a plan for economic growth. The Chancellor targeted his limited scope for manoeuvre at family budgets and the burdens on business.

"A Budget for making things, not making things up", the Chancellor said. To rebalance the economy away from debt-fuelled state spending and an unhealthy reliance on the City of London, to "a Britain carried aloft by the march of the workers".

Mr Osborne delivered a Budget that kept to his plan of cutting public sector borrowing and fuelling private sector growth. "Britain has a plan and we are sticking to it", he said. In spite of rising inflation, lower short-term growth and higher medium-term borrowing The Chancellor announced that his plan to cut the deficit was on track and was essential for realising his ambition of turning Britain into Europe's top business location.

Mr Osborne confirmed that the tax-free personal allowance will rise £630 to £8,015 from April 2012, and that the Treasury will consider ways to simplify our overly complicated tax system by commissioning a consultation on merging National Insurance and Income Tax.

The Individual Savings Account (ISA) limit and the Capital Gains Tax allowance, will now increase in line with the Consumer Price Index (CPI). Previously, they grew in line with the Retail Price Index (RPI), which is usually higher than CPI.

Mr Osborne offered a solution for achieving returns above the rate of inflation for savers with the re-introduction of National Savings Index Linked Certificates. The announcement of Corporation Tax being reduced from 28% to 26% is positive news for investors.

For the more adventurous investor adjustments were made to Enterprise Investment Schemes (EISs) and Venture Capital Trusts (VCTs). The Chancellor strengthened both schemes by allowing VCTs and EISs to invest more in larger companies, although these changes won't come into effect until April 2012. Subscription limits and rates of tax relief on EISs were also increased.

PLEASE NOTE THAT THIS IS A GENERAL GUIDE AND DOES NOT PROVIDE SPECIFIC ADVICE. PLEASE CONTACT US FOR FURTHER INFORMATION TO DISCUSS HOW THE BUDGET 2011 CHANGES COULD HAVE IMPACTED ON YOUR FINANCIAL PLANS.

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# Planning for growth

Creating a tax system that is more supportive of business investment

The Chancellor George Osborne delivered his plan for growth, announcing some significant steps towards creating a tax system that is more supportive of business investment and growth.

Mr Osborne provided further clarification on matters that were already under discussion in existing consultations, but the additional cut in the main rate of Corporation Tax was an unexpected announcement. The Chancellor's effective tax increases in the banking and oil and gas sectors were less well received. The expected reintroduction of enterprise zones and changes to investment incentives and entrepreneurs' relief are aimed at increasing support for new and growing businesses.

He also announced a number of unexpected moves, including a radical new relief from Inheritance Tax on gifts to charities and a reduction, rather than the planned increase, in fuel duty. Similarly, although it had been widely trailed, the decision to consult on integrating the Income Tax and National Insurance systems will be very welcome. However, this will have significant implications for all businesses.

As well as the specific reliefs that will be abolished after the review by the Office of Tax Simplification (OTS), the Budget included a wide-ranging review of existing and proposed legislation which will remove anomalies and reduce the impact of the tax system on business.

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# Economy and public finances

Growth forecasts over the medium term revised slightly upwards

The Office for Budget Responsibility (OBR) forecast for 2011 economic growth was revised down to 1.7% from 2.1% as published in November 2010. In contrast, the economic growth forecasts over the medium term have been revised slightly upwards from 2.8% to 2.9% in 2014 and 2015.

More modest growth is likely in each year from 2011 to 2014 because of fragile consumer confidence, public spending cuts, rising global commodity prices and recent problems in Japan and the Middle East.

The OBR's forecasts for public sector net borrowing for 2010/11 have been revised down slightly from £149bn to £146bn but up slightly to £46bn in 2014/15 (as compared to the £35bn forecast in November 2010). A somewhat slower fall in public borrowing is expected to be around £53bn in 2014/15 due to more subdued economic growth with cumulative borrowing over the next four years around £20bn higher than in the new OBR forecasts.

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# The key announcements from the Chancellor's second Budget speech

## ECONOMY

The independent Office for Budget Responsibility (OBR) forecasts growth of 1.7% (down from 2.1%) for 2011, 2.5% next year, 2.9% in 2013, 2.9% in 2014 and 2.8% in 2015 (this compares to OECD forecast of 1.5% for 2011 and 2.0% for 2012).

The OBR forecasts inflation to remain between 4% and 5% for most of this year, dropping to 2.5% next year and 2% in two years' time.

## BORROWING

Borrowing for this year to be £146bn – below the Government target. Borrowing will fall to £122bn next year, then £101bn in 2012/13, £70bn in 2013/14, £46bn in 2014/15 and £29bn in 2015/16.

Public sector net borrowing will decline from its peak of 11.1% of GDP in 2009/10 to 1.5% of GDP in 2015/16; the cyclically-adjusted or “structural” current deficit will be eliminated by 2014/15, with a projected surplus of 0.4% of GDP in that year, rising to 0.8% of GDP in 2015/16.

Public sector net debt will peak at 70.9% of GDP in 2013/14, before declining to 70.5% of GDP in 2014/15 and 69.1% of GDP in 2015/16.

## FUEL DUTY

New fair fuel stabiliser to be introduced, funded by increasing the supplementary charge on North Sea oil and gas production which increased from 20% to 32% from 24th March.

Fuel duty cut by 1p a litre from 6pm on 23rd March.

Fuel duty escalator that adds 1p to fuel duty on top of inflation each year to be cancelled for the rest of this Parliament.

## TAXATION

Personal tax allowance to rise from £7,475 to £8,105 in April 2012.

43 tax reliefs abolished to simplify the system.

Merging of National Insurance Contributions and Income Tax.

Rate relief holiday for small businesses extended to October 2012.

Tax avoidance loopholes to be closed, raising £1bn.

Charge on non-domiciled taxpayers to increase from £30,000 for those here for

seven years to £50,000 for those in the country for 12 years.

Council tax frozen or reduced this year in every English council.

## HOUSING

Reviews launched of the revenue raised by the 50% tax rate and the taxation of very high-value property.

£250m to help first-time buyers purchase newly-built homes.

Support for Mortgage Interest scheme extended to January 2013.

## ENTERPRISE

Corporation Tax cut by 2% from 6th April 2011 – rather than 1% as previously announced – and will fall by 1% in each of the next three years to reach 23%. Bank Levy rate to be adjusted next year to offset the effect of Corporation Tax reduction on banks.

£350m worth of regulation on businesses removed. Relief for entrepreneur tax doubled to £10m.

Entrepreneurs' relief scheme doubled to £10m from 6th April 2011.



Small business rate relief holiday extended by one year to October 2012.

21 new enterprise zones to be funded, including in Manchester, Birmingham and London. Ten others to be named in the summer.

Help for manufacturing to include new export credits, a technology and innovation centre and nine new university centres.

Investment of £100m in new science facilities in Cambridge, Norwich, Harwell and Daresbury, funded from the Bank Levy.

All planning bodies to prioritise growth. Default answer to development will be “yes”.

Income Tax relief on Enterprise Investment Scheme's increased from 20% to 30%.

Small companies' Research and Development tax credit increased to 200% from 6th April and 225% in 2012.

New funding to double the number of university technical colleges from 12 to at least 24.

Number of places on a new work experience scheme to increase to 100,000 over two years, rather than 20,000 as previously announced.

Funding for 40,000 new apprenticeships for young unemployed.

### PENSIONS

State Pension Age to rise to 66 by 2020.

Government to seek automatic mechanism for future increases in state pension age, based on regular reviews of longevity.

New single-tier pension, worth £140 a week, set just above means-tested pension credit of £137.35. This will not apply to current pensioners.

### CHILDREN

New tax-efficient children's savings account, known as the Junior Individual Savings Account (ISA).

### ENVIRONMENT

Green Deal to reduce energy bills from next year.

New “Green Investment Bank”, will have access to £3bn of funds and starts operating in 2012.

The UK to become the first country in the world to introduce a carbon price floor for the power sector.

Public money will cut unusually high water bills in South West England.

Climate Change Levy discount on electricity for those signing up to climate change agreements will rise from 65% to 80% from April 2013.

Plans to switch air passenger duty (APD) from passengers to planes have been dropped. This year's APD rise is postponed for a year, and the Government will seek to impose the tax on private jets.

### GIVING

Gift aid administration to be simplified, especially for small donations.

10% Inheritance Tax discount for charitable donations.

### INFRASTRUCTURE

Investment of £200m in regional railways.

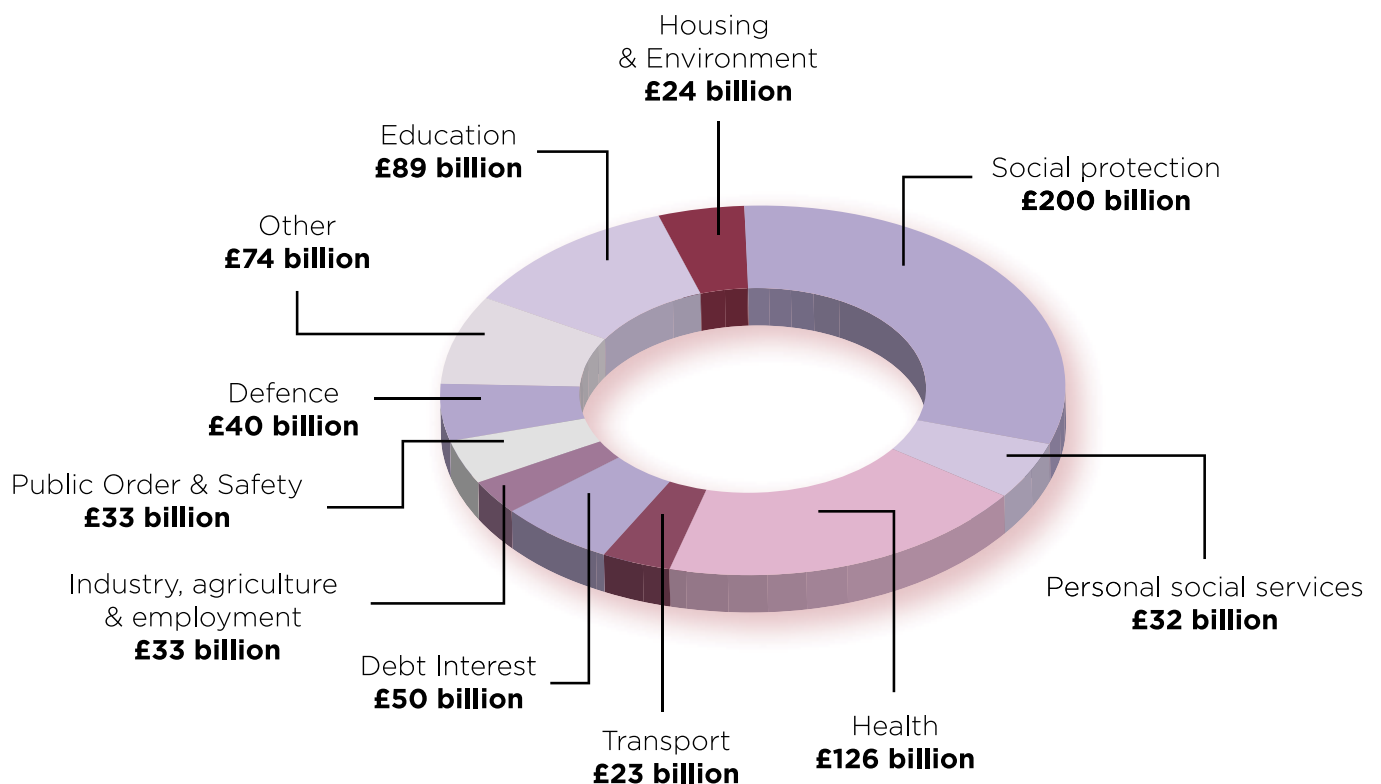
Central funding of £100m to help councils repair potholes.

DOWNING  
STREET SW1

CITY OF WESTMINSTER

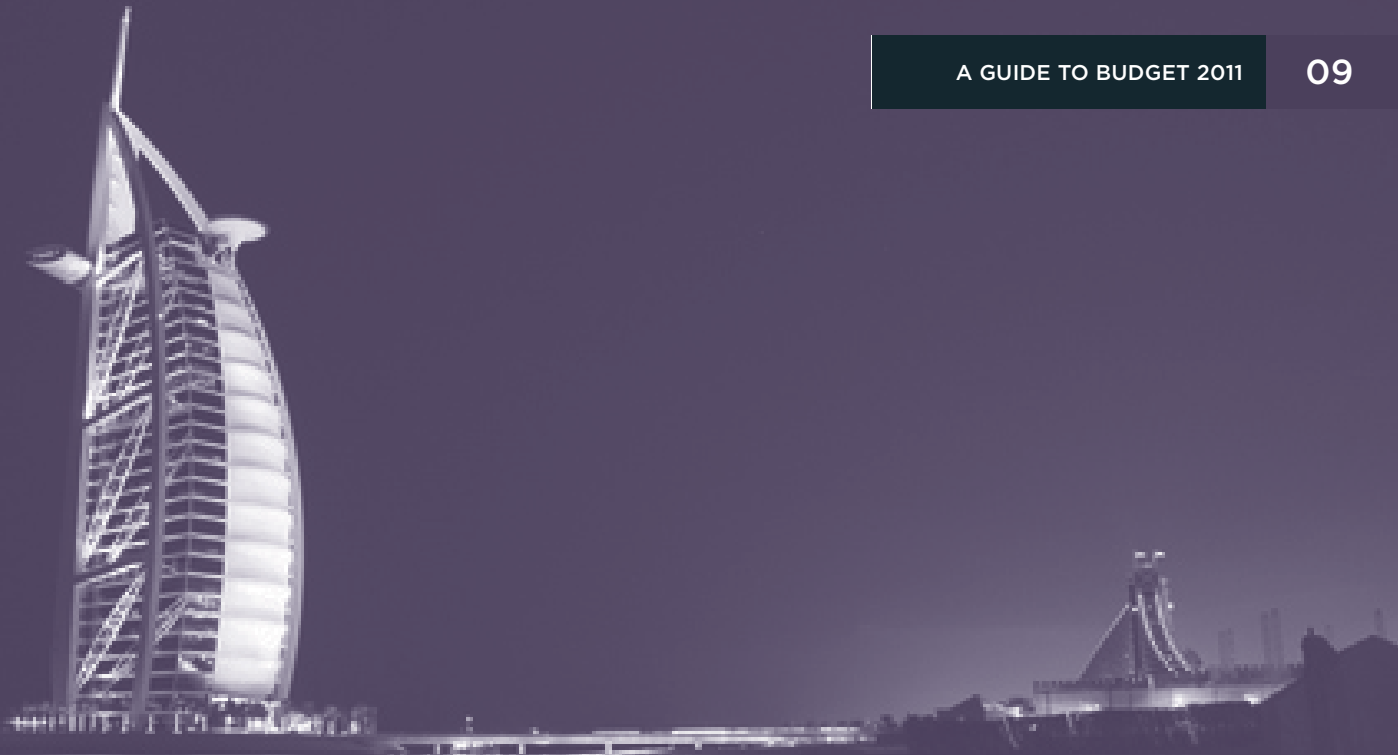
# Government Spending 2011/12

Total spending £710 billion



Source: Office for the Budget Responsibility, 2011/12 estimates. Allocations to functions are based on HM Treasury analyses.





# Residence and domicile

Encouraging those who want to live and invest in the UK

Non-doms will be able to remit income and/or Capital Gains Tax free for the purpose of commercial investment in UK businesses.

This saves the tax that would have otherwise been payable on the amounts remitted. Following a consultation this will establish what investments will qualify, but in general this is designed to encourage those who want to live and invest in the UK.

The remittance basis charge increases from £30,000 to £50,000 for non-doms

who have lived in the UK for 12 years. There will be no other substantive changes to the tax regime for non-doms for the remainder of this Parliament.

Removing the tax charge on remittances for those investing in the UK is aimed at encouraging more investment. A further consultation document will be published in June. However, it's still unclear whether other countries (particularly the US) will accept the remittance basis charge as a tax charge and so creditable against tax liabilities incurred on the same income in those countries.

*Non-doms will be able to remit income and/or Capital Gains Tax free for the purpose of commercial investment in UK businesses.*

## Junior Individual Savings Account

Savings for children in Britain

A new tax-efficient children's savings account, known as the Junior Individual Savings Account (ISA), is available from 1 November 2011. The decision to introduce the Junior ISA was unveiled last October following the announcement that Child Trust Funds (CTFs) would cease for babies born after 2010. Parents can either save in a Cash ISA or invest in a Stocks and Shares ISA.

Parents, family and friends can contribute up to £3,000 a year. Any child resident in the UK who isn't eligible for a Child Trust Fund:

- Children born on or after 3rd January 2011
- Under 18's born before September 2002

However, unlike CTFs, there will be no Government contributions to the Junior ISA.

*Parents, family and friends can contribute up to £3,000 a year in a Cash ISA or invest in a Stocks and Shares ISA.*

# Budget 2011

Who can expect to be 'better' off following George Osborne's Budget speech?

## FIRST-TIME BUYERS

First time buyers are to receive aid from the Government to the value of £250m. Under a scheme called Firstbuy Direct, 10,000 individuals will be helped to get on the housing ladder, filling the gap in the market left by Labour's Homebuy Direct initiative, which ended last year.

The new scheme will help individuals buy new build properties, which should also support the construction industry. First-time buyers will need to raise only 5% of the deposit themselves.

The Government will provide 10% and the remaining 10% will come from the house-builder.

The Government aid, structured as a loan, will be available to households earning less than £60,000. The loans would be interest free for five years, with borrowers paying 1.75% interest the year after and then 1% above inflation.

## LOW AND MIDDLE-INCOME EARNERS

The personal allowance, the amount that people can earn free of tax, is to rise by £630 to £8,105 – on top of the £1,000 increase announced in the Emergency Budget last summer.

The move is expected to benefit 25 million people and take 250,000 out of Income Tax altogether. Unlike the previous increase, effective April this year, it will benefit those paying higher rate 40% tax as well as those on lower incomes. But those earning more than £114,950 will not benefit from the increase.

## TRAVELLERS

The Chancellor offered travellers a small financial incentive by freezing air passenger duty.

## INVESTORS

The level of Income Tax relief for Enterprise Investment Schemes (EISs) increased from 20% to 30% from 6th April 2011.

The Government will also increase the size of a company that can qualify as an EIS and raise the limit that can be invested in a firm by 400%.





# Budget 2011

Who can expect to be 'worse' off following George Osborne's Budget?

## SAVERS

There were few measures announced to help prudent savers, struggling to protect their money against low interest rates and rising inflation. The Chancellor indicated that inflation, as measured by the Consumer Price Index, is likely to remain between 4% and 5% for the rest of 2011.

## PENSIONERS

Pensioners will not benefit at all from the changes announced to the personal allowance increase, as they already receive a higher personal allowance and this has not been increased. Currently those aged between 65 - 74 don't pay tax until earnings exceed £9,490, rising to £9,640 for those aged 75 and over.

## HIGHER EARNERS

Mr Osborne announced that the 50p tax rate is temporary and a review will take place to see how much is raised each year from this. Those earning over £150,000 look set to continue paying this top rate of tax for the foreseeable

future. In addition those in this tax bracket won't benefit from the biggest tax giveaway – the raising of the personal allowance, both this year, and next. This is because the personal allowance starts to be withdrawn once earnings top £100,000 and disappears altogether when income reaches £114,950 a year.

The Chancellor announced a crackdown on tax loopholes which also includes avoidance of stamp duty on the most expensive properties. In addition, there will be a tightening of the Capital Gains Tax rules, and the practice which sees some highly paid employees offered interest-free loans from their companies in exchange for taxable earnings.

## TAXPAYERS

In future, tax thresholds will continue to be indexed each year, but this will be linked to the (currently lower) Consumer Price Index (CPI) rather than the Retail Price Index (RPI). This means that these tax thresholds could potentially increase

at a lower rate than they have done in the past.

## PUBLIC SECTOR WORKERS

The Chancellor indicated that public sector workers can expect to pay an average of 3% more a year for their pensions in future. Later retirement dates and a switch to a career average scheme, are likely to be worth less for many people. This is on top of the additional 1% National Insurance Contributions all employees pay from 6th April this year.

## THOSE WITH LARGE ESTATES

As expected Mr Osborne announced there will be a review of the Inheritance Tax laws, unexpectedly though, rather than clamping down on wealthier estates that can effectively avoid death duties through trusts and careful tax planning.

## SMOKERS AND DRINKERS

Tobacco prices up 2% above inflation and 5p to added to a pint of beer.

# A Budget for business

## The highlights at a glance

### CORPORATION TAX RATES

The main rate of Corporation Tax reduced from 28% to 26% from 1st April 2011, with a subsequent reduction in each of the following three years so that the rate from 1st April 2014 will be 23%. This represents an additional 1% reduction in the proposed Corporation Tax rates announced in the emergency Budget in June 2010.

With effect from 1st April 2011 the small companies' rate reduced to 20%.

### CAPITAL ALLOWANCES

From 1st April 2011 a short-life asset election can now be made where an asset is likely to be sold or scrapped within eight years of its acquisition. This could be beneficial for assets that depreciate faster than the rate of capital allowances. Where the asset is sold or scrapped within the eight year period, capital allowances equal to the net cost of the asset are given to the business during the period of ownership of the asset. This is an extension of the current short-life asset election where the asset must be sold or scrapped within four years to obtain the accelerated relief.

In summer 2011 the list of assets qualifying for 100% capital allowances under the Enhanced Capital Allowances Scheme for Energy Saving Technologies will be updated. This will simplify the qualifying criteria for some assets and include a new addition for energy efficient hand dryers.

### VAT

The VAT registration threshold increased to £73,000 and the deregistration threshold to £71,000.

### RESEARCH AND DEVELOPMENT (R&D) TAX RELIEF

The Chancellor announced that, subject to EU state aid approval, the tax deduction for qualifying expenditure on research and development by SMEs will be increased. The current rate of 175% of the expenditure increased to 200% from 1st April 2011 followed by a further increase to 225% from 1st April 2012.

**Subject to consultation the following changes will be introduced in 2012:**

- The requirement to incur a minimum of £10,000 per annum of qualifying R&D expenditure will be removed.
- The rule limiting the repayable R&D credit under the SME scheme to the amount of Income Tax and National Insurance paid by the company will be abolished.
- Changes to the rules for R&D relief on work done by subcontractors under the large company scheme.

### ANTI-AVOIDANCE

The Government continues to introduce new measures to counteract anti-avoidance and close the tax gap. Details of HM Revenue & Customs' (HMRC) new anti-avoidance strategy have been published together with a number of proposals for strengthening tax legislation. In addition, specific measures are being introduced to close known loopholes.

### ENTREPRENEURS' RELIEF

The enhancement of entrepreneurs' relief, which reduces the rate of Capital Gains Tax paid by taxpayers on qualifying disposals to 10% (from a maximum rate of 28%) for certain disposals of business assets or shareholdings, is significant: the increase in the lifetime allowance from £5m to £10m from 6th April 2011 means the relief will then be worth £1.8m compared to £900k.

### OTHER MATTERS

**A number of other measures have been announced:**

- HMRC will continue to provide advice and time to pay to businesses experiencing temporary financial difficulty.
- The small business rate relief holiday will be extended for one year from 1st October 2011.
- Business rate discounts of up to 100% for five years will be given to businesses located in 21 new Enterprise Zones.









# Corporate taxation

## Accelerating the Government's move to make the UK tax system more competitive

The planned reduction in the main rate of Corporation Tax is to come more quickly than envisaged and will ultimately go further, accelerating the Government's move to make the UK tax system more competitive. But not every sector will benefit.

It had already been announced that the main rate of Corporation Tax would be reduced from 28% to 27% from 1st April 2011, but this has been reduced further to 26%.

| CORPORATION TAX           |           |                       |
|---------------------------|-----------|-----------------------|
| Financial year commencing | Main rate | Small companies' rate |
| 1 April 2011              | 26%       | 20%                   |
| 1 April 2012              | 25%       | 20%                   |
| 1 April 2013              | 24%       | 20%                   |
| 1 April 2014              | 23%       | 20%                   |

The reduction in the rate has not been extended to ring fence profits from oil and gas, which remains at 30%. This, coupled with an increase in the supplementary charge for oil and gas companies from 20% to a headline rate of 32%, is likely to lead to a significant increase in the tax liability for companies in this sector. The increase in the tax rate may also introduce uncertainty for investment decisions given its variability (and the mechanism has not yet been determined). In particular, the reduced return on investment may affect further investment in the North Sea.

In his speech, the Chancellor stressed that the decrease in the main Corporation Tax rate would not affect the overall amount of taxes paid by banks, as there will be an increase in the Bank Levy.

# Charitable giving

## Additional incentives for substantial charitable legacies

Measures to encourage charitable giving will be of interest to both the voluntary sector and those who donate to charity. The reduction from 40% to 36% in the rate of Inheritance Tax (IHT) applicable from 6th April 2012, where 10% or more of a deceased's net estate is left to charity should provide additional incentives for substantial charitable legacies.

The relaxation on the limits which restrict the value of benefits that individuals may receive as a result of making charitable donations that qualify for Gift Aid, raising the overall cap of £500 to £2,500 from 6th April 2011, should encourage more giving. Similar arguments apply to the simplification of the administration of Gift Aid through the introduction of online filing and allowing charities to claim Gift Aid on up to £5,000 of small donations per year without the need for Gift Aid declarations.

### OTHER CHANGES TO CHARITIES AND CHARITABLE GIVING

**Gifts of art** - the Government is considering the introduction of a lifetime tax reduction for taxpayers who give a work of art or an historical object to the State.

**Gift Aid records** - with the abolition of form filing for small sums (£10 or below), Gift Aid will be claimable on smaller donations for charities from April 2013.

**Gift Aid donor benefit limits** - from 6th April 2011 the maximum value of benefits that an individual or company can receive as a result of making a donation to charity of more than £10,000 under Gift Aid increased from £500 to £2,500. The current rule of the benefit not exceeding 5% of the gift will remain.

### OTHER CHANGES TO THE INHERITANCE TAX NIL RATE BAND

The current £325,000 nil rate IHT band is frozen until April 2015, and will be indexed against the consumer prices index measure of inflation.

The move to boost philanthropy, known as "10 for 10", will cost the Treasury about £170m a year by 2015/16 but it is estimated the measure could result in more than £350m worth of additional legacies in the first four years of the scheme.

Mr Osborne told the Commons: "If you leave 10% or more of your estate to charity, then the Government will take 10% off your IHT rate. Let's be clear: no beneficiaries will be better off, just the charities to the tune of £300m. I want to make giving 10% of your legacy to charity the new norm in our country".





# EIS and VCT funding

## Encouragement to help small companies raise finance

There was also encouragement to help small companies raise finance, with the Chancellor proposing a significant increase to the venture capital tax reliefs, by increasing the tax relief available, and raising some of the size limits for qualifying companies. The increase in the maximum amount an individual can invest in a qualifying Enterprise Investment Scheme (EIS) company, has been doubled from £500,000 to £1m, and should be particularly helpful to companies raising funds from business angel investors.

The changes announced will be welcome to many small companies which have struggled to raise funds in recent times, and have particularly found the changes brought in since 2006 unduly restrictive, although it will

be 12 months before the current restrictions are raised.

The rate of Income Tax relief given for EIS investments made through an approved EIS fund will depend upon the date on which the fund closes. Funds which closed by 5th April 2011 received Income Tax relief of 20%, but if they close after 5th April 2011 the rate of relief will be 30%. But if an EIS investment made in the 2011/12 tax year is carried back to 2010/11, the rate of relief will be 20%, not 30%; so investors will need to carefully consider whether a carry back claim should be made.

Further changes to the EIS are proposed from April 2012. The amount that a company can raise in any rolling twelve month period

will increase from £2 million to £10 million. The size of a qualifying company is also to be increased from £7 million gross assets to £15 million (before the EIS investments are made).

Companies whose businesses consist to a substantial extent (i.e. 20% or more) of the receipt of feed-in tariffs (or equivalent) will no longer be eligible to receive Venture Capital Trust (VCT) and EIS funding. This change will affect most green energy generating companies, and not just solar power. The timescale for the change will depend upon when the investment is made in such companies. The policy objective is that companies benefiting from such subsidies should not also benefit from EIS and VCT funding.



# Low carbon policies

Putting low carbon development at the heart of the Chancellor's strategy for renewed growth

## FUEL DUTY

The planned rise in fuel duty, expected to add 5p to a litre of petrol from 6th April 2011, was postponed and instead the Chancellor announced a 1p reduction. Individuals and small businesses will find this helpful although it seems contrary to the commitment to increase environmental taxes. But fuel duty is already significantly in excess of other fuel taxes in terms of the price it places on carbon dioxide emissions.

## AIR PASSENGER DUTY

Proposals to reform air passenger duty (APD) into a per plane tax have been set aside, for the moment, as this would

be contrary to international law (while the Government lobbies to get that changed). A small planned increase in APD has also been postponed until next year. A broader consultation will now take place on other potential changes to APD with the aim of simplifying the tax. There are currently four bands and the consultation proposes to reduce this to three or two bands.

## CARBON PRICE FLOOR

The introduction of a carbon price floor for the power sector was widely expected. The precise details and its interactions with other mechanisms are not yet clear. The carbon price floor is in line with current market

expectations for carbon prices, so there is a reasonable prospect of the floor providing certainty to investors, without embedding a big extra cost to the power sector.

## GREEN INVESTMENT BANK

The amount of funds available to the Green Investment Bank is to be tripled to £3bn. The Government anticipates that this will, together with private capital, ensure £18bn of funds is available by 2014/15. The Government also confirmed that the bank will not be allowed to borrow until 2015 at the earliest and even then it will be subject to national debt reduction targets being met.



# Anti-avoidance

## Maintaining fairness in the tax system

The Government has issued further details of its plans to tackle tax avoidance and maintain fairness in the tax system. At the heart of these plans is a new HM Revenue & Customs (HMRC) anti-avoidance strategy with a focus on prevention, detection and effective counteraction of tax avoidance.

HMRC has reinforced its intention to use litigation to counter tax avoidance and sets out details of recent cases before the Courts. HMRC will continue to allocate its resources to those taxpayers, individual and corporate, demonstrating the highest risks and use its relationship-managed approach to identify such risks.

HMRC will consult during the summer of 2011 on proposals to remove any cash flow advantages that users of some tax avoidance schemes may accrue. It's not known how HMRC will determine which arrangements might be subject to the proposed restriction.

HMRC will continue to further strengthen the disclosure of tax avoidance scheme rules to aid early detection and counteraction activity.

The consideration of a general anti-avoidance rule (GAAR) is also still ongoing, with the study group, headed by Graham Aaronson QC, due to report to the Government by 31st October 2011.

### Specific anti-avoidance measures:

- Avoidance involving Income Tax losses and unauthorised unit trusts have been identified as particularly high risk areas and will be subject to consultation and potential legislative changes in 2011 and 2012.
- There's further confirmation of the rules to counter avoidance in relation to accounting derecognition, group mismatches (tax asymmetries within groups) and functional currency changes. Changes to the debt cap rules and foreign exchange tax matching are really refinements rather than new anti-avoidance rules. The new election for investment companies to use a currency other than their accounting 'functional currency' will help some companies affected by hedging difficulties otherwise resulting from the above changes.
- Three stamp duty land tax (SDLT) avoidance loopholes are also specifically being closed. In the meantime HMRC is likely to follow up its previous public announcements on 'sub-sale schemes' with continued investigation and litigation. The Budget speech referred to the need to tackle evasion and avoidance in relation to high value property by some wealthy people; it may well be referring to selling property enveloped in a company, although there are no further references in the supporting documents, and it's not clear what action is envisaged.



# State pension age

## Helping Britain live within her means

Employees could see their retirement pushed back at least 12 months every two years after the Chancellor, George Osborne announced plans to link the pension age to rising longevity. The Chancellor announced a mechanism to raise the state retirement age automatically in line with life expectancy. The pension age is already due to increase to 66 by 2020.

Mr Osborne said it would no longer be “affordable” to provide an adequate state pension when most people could retire at the relatively young age of 65 or earlier. In future, he said, regular, independent reviews should establish longevity rates, which would then be used to decide the state pension age.

Retirement for public sector employees is due to be linked to the state pension

age by the end of the current Parliament. Longevity is rising at a rate of seven months every year, meaning that, under the proposal, employees in their twenties, thirties and forties could find themselves working beyond their 75th or even 80th birthday.

A number of other European countries, including Sweden, Norway and Germany, have introduced some link between the state retirement age and life expectancy. Mr Osborne said that adopting a similar link would “help Britain live within her means”. He said he wanted pensions which were fair to workers and “fair to the taxpayers who have to fund them”.

Large pension funds increased their longevity expectations for the fourth year running last year, saying they expected future pensioners to live an extra seven months. Men who are currently 65 should expect to live until they are 87 years and five months, while women will survive to nearly 90 on average.

At the current rate, by 2066, around half a million people a year will be celebrating their 100th birthday, compared with about 10,000 now.

*Employees could see their retirement pushed back at least 12 months every two years after the Chancellor, George Osborne announced plans to link the pension age to rising longevity.*



# National Savings & Investments

## Reintroduction of index-linked savings certificates pegged to the retail prices index

National Savings & Investments (NS&I) is to relaunch index-linked savings certificates pegged to the retail prices index (RPI). NS&I withdrew the certificates last July after they became over subscribed. Currently they are only open to clients who have certificates that are maturing.

Returns will continue to be linked to RPI and tax-free. The maximum that can be saved is £15,000 per individual per investment. Typically certificates pay a specified rate plus RPI. Certificates will be on sale at a later date.

The Chancellor, George Osborne has agreed a £2bn target for new funds to be raised by the Government bank, which will pave the way for the reintroduction of bonds paying out interest based on the retail prices index.

In a statement, NS&I said: "NS&I's target for net financing for 2011/12 is £2bn in a range of £0bn to £4bn. This positive net

financing target will allow NS&I to plan the reintroduction of savings certificates for general sale in due course. Currently only savers with maturing investments in savings certificates can continue to rollover their investments for a further term.

"Subject to market conditions, NS&I expect to be bringing savings certificates back on general sale in 2011/12. NS&I can also confirm that a new issue of index-linked savings certificates will retain index-linking against the RPI".

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# Buy-to-let

## Solving Britain's housing shortage

The UK is set for the return and major expansion of buy-to-let in the housing market after plans were unveiled for tax cuts on bulk purchases of residential properties. The Coalition has identified buy-to-let as a way of solving Britain's housing shortage and wants to attract investment into residential property by major institutions, such as pension funds, and landlords.

The Chancellor, George Osborne believes that promoting the private rental sector as a solid form of income for investors can increase homebuilding. The British Property Federation, which has campaigned for tax changes on bulk housing purchases, said the Budget "went

further than even the most optimistic within the industry could have predicted".

It is now proposed that stamp duty on the purchase of more than one property will be calculated by the average value of the properties, not the bulk value. This means that if an investor buys 100 properties worth an average of £200,000, it will pay stamp duty at 1%, equal to £200,000, rather than at 5%, equal to £1m. The measure will cost the Treasury £560m over five years.

George Osborne has also launched consultations on making it easier for residential investors to become a Real Estate Investment Trust (REIT), which

would mean they do not pay Capital Gains Tax. In the 2012 Budget, the Chancellor is proposing to scrap the 2% entry charge that landlords must pay to become a REIT and ending the rule restricting REITs to stock market-listed companies. This will allow pension funds to turn property portfolios into REITs and potentially allow smaller buy-to-let landlords to benefit from tax advantages on capital gains.

The Chancellor also aims to stimulate investment through traditional housebuilders. As well as a £250m fund for first-time buyers, he will allow offices to be converted into homes without planning permission and auction public sector land for development.



# Budget 2011

## Chancellor George Osborne's speech in full

Mr Deputy Speaker, last year's emergency Budget was about rescuing the nation's finances, and paying for the mistakes of the past. Today's Budget is about reforming the nation's economy, so that we have enduring growth and jobs in the future. And it's about doing what we can to help families with the cost of living and the high oil price.

We understand how difficult it is for so many people across our country right now. That we are able now to set off on the route from rescue to reform, and reform to recovery, is because of difficult decisions we've already taken. Those decisions have brought economic stability. And without stability there can be no sustainable growth or jobs. Without stability Governments have to keep coming back to their citizens for more – more taxes and more spending cuts.

In Britain, we do not have to do that today. We inherited a record budget deficit. But we have set out a credible, comprehensive plan to deal with it. We have had to undertake difficult measures. But we have already asked the British people for what is needed, and today we do not need to ask for more.

So this is not a tax-raising Budget. But nor can we afford a giveaway. Taken together the measures I will announce today are fiscally neutral across the period. This is a Budget built on sound money. A Budget that encourages enterprise. That supports exports, manufacturing and investment. That is based on robust independent figures. A Budget for making things not for making things up.

Britain has a plan. And we're sticking to it. In recent months, many other countries have seen their ratings downgraded and their borrowing costs soar. Our country's fiscal plans have been strongly endorsed by the IMF, by the European Commission, by the OECD, and by every reputable

business body in Britain. And for anyone who questions whether this matters in the real world, to real businesses and families, consider this.

Market interest rates in Greece are 12.5%, in Ireland they are close to 10%, in Portugal and Spain they are 7% and 5%. Today our country's market interest rates have fallen to 3.6%. We have a higher deficit than Portugal, Greece and Spain, but we have virtually the same interest rates as Germany. This is our powerful monetary stimulus to our recovering economy.

Stability. Credibility. Lower interest rates. This is what we've achieved. But stability is not enough. So today, in addition to the Red Book, we are publishing the Plan for Growth. For this Budget confronts the hard truth that has been ignored for too long. Britain has lost ground in the world's economy and needs to catch up. In the last decade, other nations have reduced their business tax rates, removed barriers to enterprise, improved education systems, reformed welfare and increased exports. Sadly the reverse has happened in Britain.

We gambled on a debt-fuelled model of growth that failed. With the state now accounting for almost half of all income, we simply cannot go on like this. Britain has to earn its way in the modern world.

Mr Deputy Speaker, I turn now to the forecasts. Last November I told the House that the recovery was going to be more challenging than recoveries from recessions in recent decades. That is inevitable when we've had the sharpest fall in output since the 1930s, the highest budget deficit in peacetime, and the largest banking crisis in our entire history.

But I said that thanks to the course we have set, the independent forecast was for our economy to grow in each of the next five years, for unemployment to peak this year and then fall and

for employment to rise through this Parliament. That remains the case in the independent forecast published today. Those forecasts have been drawn up by the Office for Budget Responsibility.

This important change has transformed the way Budgets are put together. So instead of Chancellors fixing the figures to fit the Budget, they now have to fix the Budget to fit the figures. Yesterday, the legislation to put the Office for Budget Responsibility on a permanent, statutory and independent footing received Royal Assent.

I am sure that the whole House will want to thank Robert Chote, Steve Nickell, Graham Parker, and their whole staff for the very professional job they are doing. Let me start with their growth forecasts. It has been known for Chancellors in recent years to rattle these off at great speed in the hope that no one will keep up. I will not do that.

Although average quarterly growth this year is set to be higher than was previously forecast, the annual forecast for 2011 has been revised to 1.7%. This the OBR attributes specifically to the weaker than expected final quarter of last year, the rise in world commodity prices and the higher-than-expected inflation in the UK. However, the OBR point out that the effect, in their words, "creates scope for slightly stronger growth in later years" than previously forecast. So while they expect real GDP growth of 2.5% next year, they forecast it will then rise: to 2.9% in 2013; to 2.9% in 2014; followed by 2.8% in 2015.

The European Commission has also this month published its growth forecasts. These show that the UK is forecast to grow more strongly in the coming year than Spain, Italy, France, the average for the Eurozone and the average for the EU. All countries have to steer a course between two central risks. The risk of a

European sovereign debt crisis on the one hand and on the other the risk that comes from rising global commodity prices. Food prices around the world have increased by nearly 50% since the beginning of last year. Oil has risen 35% rise in just 5 months.

That is why the OBR expect inflation to remain between 4 and 5% for most of this year, before dropping to 2.5% next year and then to 2% in two years time. I have today written to the Governor of the Bank of England to confirm that the inflation target for the Monetary Policy Committee will remain at 2%, as measured by the Consumer Prices Index. I can also confirm that the Asset Purchase Facility set up by my predecessor will remain in place.

One cause of current instability is the conflict inside Libya. The whole House will praise the courage and professionalism of our armed forces, who are trying to bring that conflict to an end and save lives. And I can confirm that the additional cost of military operations will be met entirely from the Treasury reserve. The House will also know that last week I authorised for the UK to take part in a co-ordinated G7 currency intervention in support of the Japanese Yen. Our hearts go out to the Japanese people – and this is one way we can help. It is still too early to say what lasting impacts the earthquake and tsunami will have on the world economy.

But this is an opportunity for me to report that we had already decided to rebuild the UK's foreign currency reserves, which are at a historically low level. We will purchase a range of high-quality assets – though unfortunately, with the price of gold now at record highs, we will not be able to replenish the gold reserves sold at record lows.

I turn now to the fiscal forecasts for our debt and deficit. Borrowing to fund the deficit this year is now set to come in at £146 billion, below target. Then fall to £122 billion next year. Then £101 billion the year after; then £70 billion in 2013/14; then £46 billion 2014/15; followed by £29 billion by 2015/16.

Inflation has had its impact but crucially the OBR assess that next year's

structural deficit remains the same as forecast last November. In other words, the size of the task of repairing Britain's finances is unchanged. Our national debt, as a share of our national income, is forecast to be 60% this year, before peaking at 71%, and then starting to fall – reaching 69% by the end of the period.

This leads me to one of the central tasks of the OBR. That of assessing the Government's performance against its stated budget goals – in an open and independent way, so that we avoid repeating the disastrous experience of the so-called golden rule. Our fiscal mandate is to achieve a cyclically-adjusted current balance by the end of the rolling five year forecast period – which is currently 2015/16.

We have supplemented that with a fixed target for debt: so that debt should be falling as a proportion of GDP by the year 2015/16 as well. I can report to the House that the OBR confirm that on their central forecast we will meet both these objectives – a balanced structural current budget and falling national debt by the end of the Parliament. Indeed, the forecast remains that we will meet both these objectives one year earlier. But, Mr Deputy Speaker, I said at the start that stability and fiscal responsibility was not enough.

Our country has to compete if we are going to create growth and jobs. Britain has fallen behind many others in the world in the last decade. We've dropped from 4th to 12th place in the global competitiveness league. And growth in our country has been so unbalanced. Consider this staggering truth – during the boom years before the bust, private sector employment actually fell in a region as important as the West Midlands. So today's Budget is an urgent call to action for Britain. Private sector growth must take the place of Government deficits. Prosperity must be shared across all parts of the UK.

Yes, we want the City of London to remain the world's leading centre for financial services, but we should resolve that the rest of the country becomes a world leader in advanced manufacturing, life sciences, creative industries, business services, green energy and so much more. This is our vision for growth.

Difficult decisions and major reforms are needed to make it happen. But the alternative is to accept Britain's economic decline and a continuing fall in living standards for our population. And that is not an alternative anyone in this House should be prepared to accept. This Budget sets for Britain these four economic ambitions. That Britain should: Have the most competitive tax system in the G20; be the best place in Europe to start, finance and grow a business; be a more balanced economy, by encouraging exports and investment; and have a more educated workforce that is the most flexible in Europe.

Let me set out the measures now that will achieve these ambitions. First, taxation. Here's the truth – Britain used to have the 3rd lowest corporate tax rate in Europe. It now has the sixth highest. At the same time, our tax code has become so complex that it recently overtook India to become the longest in the world. Adam Smith first set out the principles of good taxation. This Government declares these principles again today for the modern age. Our taxes should be efficient and support growth. They should be certain and predictable. They should be simple to understand and easy to comply with.

And our tax system should be fair, reward work, support aspiration and ask the most from those who can most afford it. In July last year, we set up the Office of Tax Simplification to provide independent advice on how to reduce the complexity of the existing system. I want to thank Michael Jack and John Whiting for the work they have done. Following their recommendations, I can announce today that this Budget abolishes no fewer than 43 complex reliefs. This includes the 'millennium gift aid system' – which we won't need for another 989 years.

I have decided not to follow their advice to abolish the Community Investment Tax Relief – and instead I encourage people to take it up. But this Budget at a stroke removes over 100 pages from our tax code and begins the work of simplification. In the last Budget, I announced that from next month welfare payments and public service pensions would be up-rated in



line with the Consumer Prices Index. I said at the time we should also consider up-rating the tax system in the same way. So from April 2012, the default indexation assumption for direct taxes will move to CPI. There will be protection through this Parliament for those eligible for age-related, married couple and blind person's allowances – and for employers National Insurance Contributions.

The increase in the personal tax allowance already announced will vastly exceed anything lost through employee NICs up-rating, and that's even before any further increases in that allowance. This will bring coherence to the tax and benefit system, and we look at moving indirect taxes onto the same basis when the fiscal position allows. But there is one further step we should now undertake that will dramatically simplify the tax system.

For decades, we have operated Income Tax and National Insurance as two fundamentally different taxes and forced businesses large and small to operate two completely different systems of administration, with two different periods and bases of charge. The resulting anomalies are legion. And it imposes totally unnecessary costs and complexity on employers, and costs the taxpayer in the extra burden it places on HM Revenue & Customs.

So I am announcing today that the Government will consult on merging the operation of National Insurance and Income Tax. I am not proposing we extend National Insurance to pensioners, or to other forms of income, or that we abolish the contributory principle.

Our purpose is not to increase taxes, it is to simplify them. And this huge task will therefore require a great deal of consultation and take a number of years to complete. But it is time we took this historic step to simplify dramatically our tax system and make it fit for the modern age. Making our tax system more competitive is another challenge for the times we live in. Again, let's face facts. Other countries are quite deliberately making their tax systems more competitive, and attracting multi-national companies away from the UK. We could stand there and do nothing. But increasing the living standards of every hard pressed family

in the country depends on keeping those companies, and the jobs and the investment and the tax revenues that come with them, here in the UK.

So we will go ahead with the highly competitive tax rate on profits derived from patents in industries like pharmaceuticals. We will fundamentally reform the complex rules for Controlled Foreign Companies and make them more territorial. We will introduce new rules that effectively apply an ultra-competitive 5.75% rate on overseas financing income. That will give us a far more attractive system than France, America or Germany. I want Britain to be the place international businesses go to, not the place they leave. But today I want to do even more. So I can today announce that from April this year Corporation Tax will be reduced not just by 1% as I previously announced but by 2%. And it will continue to fall by 1% in each of the following three years – taking our corporate tax rate right down to 23%. 16% lower than America, 11% lower than France and 7% lower than Germany – the lowest Corporation Tax rate in the G7.

Let it be heard clearly around the world – from Shanghai to Seattle, and from Stuttgart to Sao Paolo: Britain is open for Business. And to ensure that this is not a net tax cut for banks, I am adjusting the Bank Levy rate next year to offset its effect. In each and every year of this Parliament our permanent Bank Levy raises more than the one-year bonus tax of the last Parliament. The most competitive tax system in the G20 is the first of our economic ambitions.

The second is that Britain becomes the best place in Europe to start, finance and grow a business. Again, let's face facts: we are not that today. In the last decade, countries like Germany, Denmark, Finland and the Netherlands have all overtaken us in the international rankings of competitiveness. That is not surprising when the total cost of regulation imposed on business since 1998 is almost £90 billion a year.

So in today's Plan for Growth we take action: £350 million worth of specific regulations will go – including the Equality Act's costly dual discrimination rules; Lord Young's

recommendations on health and safety laws will be implemented in full; The no-win no-fee legal services that prey on employers will be restricted; Existing regulation will be scrutinised by the public.

And from April, we are going to impose a moratorium exempting all businesses employing fewer than ten people – and all genuine start-ups – from new domestic regulation for the next three years. We will take this fight against regulation to Brussels, where my RHF the Prime Minister is this week recruiting other European allies to ensure our continent doesn't price itself out of the world. And we are going to tackle what every Government has identified as a chronic obstacle to economic growth in Britain, and no Government has done anything about: the planning system.

Councils are spending 13% more in real terms on planning permissions than they did five years ago, despite the fact that applications have fallen by a third. Yes, local communities should have a greater say in planning, but from today: We will expect all bodies involved in planning to prioritise growth and jobs; We will introduce a new presumption in favour of sustainable development, so that the default answer to development is 'yes'; We will retain existing controls on greenbelt – but we will remove the nationally imposed targets on the use of previously developed land; And we will allow certain use class changes, introduce time limits on applications and pilot for the first time ever auctions of planning permission on land.

Cumbersome planning rules and bad regulation stand in the way of new jobs. So too does the shortage of finance. Small businesses are the innocent victims of the credit crunch. That is why we have agreed with the banks a 15% increase in the availability of credit to small businesses. But the lack of start-up capital has been a long standing problem in the British economy. Too often we have the great ideas in Britain but it's other countries that exploit them. So today I announce sweeping changes to improve the generosity, the simplicity and the reach of the Enterprise Investment Scheme. From April this year, Income Tax relief will increase from 20% to 30%. Next year we

will double the amount that any individual can invest through the EIS, increase the size of company that can qualify for investment – and raise the limit on the amount that can be invested in a company by 400%.

And next week my RHF the Prime Minister and Business Secretary will launch 'Start-Up Britain', a new campaign by entrepreneurs for entrepreneurs, supported by many of Britain's most successful firms, that will help people start and grow businesses. Today we can add to that help. From 6th April this year I am doubling the size of Entrepreneurs Relief to £10 million. Let Britain be the home of enterprise in an age when people can invest all over the world.

It's time too that we ended the uncertainty around the taxation of non-domiciles. They are very welcome in this country, but I've always believed that they should pay something in return for their special tax status. The last Government followed our advice and introduced a £30,000 charge for those who had lived here for seven years. I think we can ask more from those who've been here even longer, so I'm increasing the charge to £50,000 for non-doms who have been in the country for 12 years. This will raise over £200 million in the coming years.

But in return – and to encourage investment in our country – I am removing the tax charge when non-doms remit foreign income or capital gains to the UK for the purpose of investing in a British business. And we will introduce a statutory residence test. To end the speculation and uncertainty, and to provide stability, I confirm that I will be making no further changes to the taxation of non-domiciles in this Parliament. In an age when businesses and capital and people can increasingly move anywhere, high tax rates can do real damage.

That's true for high corporate taxes. It's true for high personal tax rates too. They crush enterprise, undermine aspiration and often undermine tax revenues as people avoid them. I am clear that the 50 pence tax rate would do lasting damage to our economy if it were to become permanent. That is why I regard it as a temporary measure. Just as my Labour predecessor,

the RHM for Edinburgh South West, did when he introduced it.

I've said before that now wouldn't be the right time to remove it, when we're asking others in our society on much lower incomes to make sacrifices. For we're all in this together. But I think it's sensible to see how much revenue it actually raises. I've asked HMRC to find out the truth when the self-assessment forms start coming in. Of course, taxation must be fair. It's right that the wealthiest should pay more than others. And it's especially wrong when they avoid taxes.

I'll have more to say later on tax avoidance and evasion, but there's one area that needs extra work in the coming months, and that's on the taxation of very high value property, where evasion and avoidance are widespread and some of the wealthiest are not paying their fair share. So as well as reviewing revenues from the 50p tax rate, we will also be redoubling our efforts to find ways of ensuring that owners of high value property cannot avoid paying their fair share.

Help for small businesses. A boost for enterprise. Reforms to planning. Cuts to existing regulations and a moratorium on new ones. All part of our ambition to make Britain the best place in Europe to start, grow and finance a business. Our third ambition is to encourage investment and exports as a route to a more balanced economy for Britain. In the Plan for Growth we publish today, we set out specific measures we can take to help a wide range of businesses.

In life sciences, where we will radically reduce the time it takes to get approval for the clinical trials. In our digital and creative industries, where we will improve the intellectual property regime. In our professional and business services, one of our unsung success stories, we will reform our burdensome money laundering regime, promote the UK as the global centre of legal arbitration, and launch a new trusted business visa service. Our retail sector includes many small shop keepers anxious about the impact of coming business rate rises.

The last Government planned that the current rate relief holiday for small

businesses should end in October this year. I don't think that would be right. So I can announce that, at a cost to the Exchequer of £370 million, I will extend the rate holiday for small businesses for another year – to October 2012. We will also take action to help the construction industry.

Stamp Duty will now be levied on the mean value of the houses being purchased within a portfolio – not the bulk cost. And Real Estate Investment Trusts will be simplified to encourage home-building. But average mortgage deposits are close to 30% and this puts home ownership beyond the reach of many many families. This is not fair. So I can announce that – from the proceeds of this year's Bank Levy – we will fund a £250 million commitment to first-time buyers.

A new shared equity scheme, First Buy, will be available for first-time buyers who want to purchase a newly built property, but who cannot afford the high deposits. This will help 10,000 families get on to the housing ladder for the first time. The previous Government intended to end the temporary changes to the Support for Mortgage Interest scheme next January – instead we will extend it for another year. That will reduce mortgage arrears for around 100,000 out-of-work homeowners.

Mr Deputy Speaker, manufacturing is crucial to the rebalancing of our economy. Over the last decade, the share of the economy accounted for by financial services increased by over two thirds – while manufacturing's share fell by almost a half. Under this Government manufacturing is now growing at a record rate – and 14,000 more jobs have been created in the sector in the last 3 months. To help this continue, the Government announces plans today to: Make our export promotion more entrepreneurial and create new export credits to help smaller businesses; Launch Britain's first Technology and Innovation Centre for high-value manufacturing; And fund a further nine new university centres for innovative manufacturing.

Science is one area where Britain already has an advantage over many other countries – and it is central to our

future as a place to create businesses. That's one reason why I protected the science budget from cuts last year. I can tell the House that I have been able to find, again from this year's extra Bank Levy, an additional £100 million to invest this year in new science facilities at: The Babraham Research Campus in Cambridge; The Norwich Research Park for environmental and life sciences; And the International Space Innovation Centre at Harwell; The National Science and Innovation Campus at Daresbury.

But if Britain is really to become a home of innovation then we want research and development to take place not just in our great universities, but in our smaller businesses too. One of our greatest high tech innovators, James Dyson, has urged me to increase the support they get. I have listened to him, and gone even further than he recommends.

From April this year the small companies Research and Development Tax Credit will rise to 200% – and from next year it will rise again to 225%. We also want to encourage manufacturers to invest in the latest machinery and technology. So I propose to double the limit on the capital allowances for short life assets from four years to eight years. And the allowance for the renovation of business premises in assisted areas – which was due to expire next year – we will extend for a further five years. Supporting the private sector across the whole of the United Kingdom is central to our economic ambitions.

Savings in the Transport Department mean that we can also afford £200 million of additional investment in our regional railways. We will go ahead with the £85 million Ordsall Chord scheme, linking Manchester's Victoria and Piccadilly stations and significantly reducing journey times between Liverpool and Leeds. We can commit to – and I know many HMs have been calling for this – the Swindon to Kemble redoubling scheme. And this will complement our electrification of the Great Western Main Line to Wales. And we can find another £100 million to help councils repair the winter potholes on our roads.

Helping all parts of our country succeed is also the purpose behind the new

Enterprise Zones we launch today. Mr Deputy Speaker there has been reports that we would be able to fund 10 new Enterprise Zones. Today I confirm that instead we will fund instead 21 new Enterprise Zones. Businesses will get up to 100% discount on rates, new superfast broadband and the potential to use enhanced capital allowances in zones where there is a strong focus on manufacturing. In return for radically reduced planning restrictions, we will let local authorities keep all business rate growth in their zone for a period of at least 25 years to spend on development priorities. The first ten Enterprise Zones will be in urban areas of highest need but also potential. In: Birmingham and Solihull; Leeds; Liverpool; Greater Manchester; The Tees Valley; Tyneside; The Bristol area; The Black Country; Derbyshire and Nottinghamshire; and Sheffield.

Tomorrow, my RHF the Prime Minister and Deputy Prime Minister will announce some of the specific locations of these new Enterprise Zones. And I confirm that a further Zone will be located in London – where I have asked the Mayor to choose a suitable site.

A further ten Enterprise Zones will be announced in the summer. I want Local Enterprise Partnerships all over the country to come forward with proposals.

Responsibilities are devolved in Northern Ireland, Scotland and Wales, so we will work with the administrations so that they too can enjoy the benefits of this policy. In Northern Ireland, tomorrow the Treasury will publish a paper on how we help their private sector to grow. To deal with the unique issues posed by the Irish Republic's business tax regime, it considers the case for Northern Ireland having an even lower rate of Corporation Tax than the rest of the UK.

I look forward to engaging with all parties there on the way forward. There is one other particular issue that affects a specific part of our country. And that is the very high water bills for customers in the South West, because of the geography there, particularly for those on lower incomes. So we will come forward with public money to help bring their bills down.

Mr Deputy Speaker, let me turn now to opportunity presented by the

green energy revolution – and our determination to be the greenest Government ever. We've already announced our ambitious Renewable Heat Incentive and support for low emission cars, and changes to the company car tax regime today increase that support. Our Green Deal to reduce the energy bills for homes will be introduced next year, and I now confirm that we will act to incentivise and encourage its take up.

We are pioneering new Carbon Capture and Storage technology with £1 billion already provided – and future projects will be funded out of general spending rather than a complex new levy. But we need to take two further, bold steps if we are to make the green energy revolution a reality.

First, as I have long-argued, investment in green energy will never be certain unless we bring some stability to the price of carbon. Today we become the first country in the world to introduce a carbon price floor for the power sector. The price will start at around £16 per tonne of carbon dioxide in 2013 and move to a target price of £30 per tonne in 2020. This will provide the incentive for billions of pounds of new investment in our dilapidated energy infrastructure. To ensure customers get a fair deal, we will closely follow developments in the energy sector in the light of the OFGEM review published on Monday.

At the same time I am extending the Climate Change Agreements to 2023, and increasing the Climate Change Levy discount on electricity for those who sign up from 65% to 80% from April 2013. This will help our most energy intensive industries. Green taxes will increase as a proportion of our total tax revenues, as we promised.

The second bold step we take today is the creation of the Green Investment Bank, to support low-carbon investment where the returns are too long-term or too risky for the market. We've already committed a billion pounds to it. Today I commit two billion pounds more, funded from asset sales and underwritten by the Treasury. This will enable the Green Investment Bank to start operation one year earlier than planned – in 2012. It will leverage an additional £15 billion

of private sector investment in green projects over this Parliament. I can also confirm today that from 2015/16 and subject to our overall debt target being met, we will allow the Green Investment Bank to borrow and invest in a better future. So a Green Investment Bank with its resources trebled. A new Carbon Price floor. New capital allowances for manufacturing. New support for homebuilders and first-time home buyers.

An economy where the growth happens across the country and across all sectors. That is our ambition. And leads me to this fourth ambition. To create a more educated workforce that is the most flexible in Europe. Britain's working age population has lower skills than the populations of America, Germany and France. That's probably the biggest problem facing our economy in the future. That's why we're undertaking far-reaching reform of our schools and universities, and funding a Pupil premium and additional early years support for our most disadvantaged children in poverty. That is why we commissioned Alison Wolf's impressive report.

The Government is committed to funding new University Technical Colleges which will provide 11-19 year olds with vocational training that is among the best in the world. The curriculum is being developed in close co-ordination with both local universities and leading employers – and I commend Ken Baker for getting these new colleges up and running in our manufacturing heartlands. To date the Government has announced that it will fund 12 new University Technical Colleges.

I can tell the House we will provide funding to double that number to at least 24. We will also deal directly with the challenge of youth unemployment that has been on a steady rise for the last seven years, and give people direct contact with the work place. Instead of 20,000 young people benefiting from our new work experience scheme, as we planned, we will increase that number fivefold – to 100,000 places over the next two years.

In Austria, Germany and Switzerland around one in four employers offer apprenticeships. In England fewer than one in ten do. That's got to

change. Last year, my RHF the Schools Minister published a Skills Strategy and confirmed the largest ever expansion in adult apprenticeships. Today, I am funding another 40,000 apprenticeships for young unemployed people. There are currently only 1,500 higher level apprenticeships across the whole of England. This Budget provides for 10,000 more. That brings a total of 250,000 more apprenticeships over the next four years, as a result of this Government's policies. A Government backing what works, real training, secure jobs, more growth.

Mr Deputy Speaker, we shouldn't talk about those at the start of their working life – without also talking about those who are coming to the end of their working lives and looking to retirement. I am very proud that it was this Coalition Government that took the decision to re-link the basic state pension to earnings – and guarantee its increase through a triple lock. This would simply not have been affordable – as Adair Turner's report argued – without an increase in the State Pension Age. The State Pension Age is set to rise to 66 by 2020. I can tell the House that we will now seek – hopefully with all-party support – a new, more automatic mechanism for future increases in the State Pension Age based on regular, independent reviews of longevity. This is another major reform that will help Britain live within her means. We also need to make sure that our public service pensions are both fair to those who give their working lives to help others, and fair to the taxpayers who have to fund them.

Today we publish the result of our consultation on the discount rate, which shows that a more appropriate rate would be inflation plus GDP growth. This reinforces our case for increasing the employee contributions by an average of 3 percentage points. Indeed, the new discount rate could be used to justify further contribution rises. As part of the wider reforms, I am not proposing to ask for more than the 3 percentage point average. John Hutton has now completed his final report, which looks at the pension benefit. I am sure Members in all parts of this House will want to thank him for a very impressive piece of work.

I confirm today that the Government accepts Hutton's recommendations as a basis for consultation with public sector workers, unions and others. There should be no cherry-picking on either side. I believe this House should also recommend similar changes to the pensions of MPs. And we should also address the state pension system, which has become unbelievably complex. If people can't work out what they're going to get in retirement, or how much will be clawed back by the means-tests – then they can't work out what they need to save.

So the Pensions Minister, the Pensions Secretary and I have worked together to develop options including a new single-tier pension. It would be simple; it would be based on contributions; it would be a flat-rate, so people know what to expect. And it would cost no more than the current system. We currently estimate this new single-tier state pension would be worth around £140 per week. It will not apply to current pensioners – and it will take years fully to come into effect.

As with the other major reforms I have announced today to simplify our tax system, improve our economic performance and reform our public sector pensions – this Government is doing the right thing for the long term. The most competitive corporate taxes. The best place to start-up and run a business. An investing, exporting, greener more balanced economy. A better educated workforce. A fairer pensions system. These are our ambitions for Britain. With the measures to match.

Mr Deputy Speaker, let me now turn to personal taxes and duties. And let me start by noting that a society should not just be judged by the strength of its economy, but also the compassion of its people. The Culture Secretary and I have been working on a series of substantial reforms that will support giving, from the largest donations to the coins collected in the charity bucket.

First, we will dramatically simplify the administration of Gift Aid. Instead of asking charities to submit a written record of every donation made, we will by 2013 pay for a much easier online system.

Second, we will encourage wealthy people in our society to give even more. The Gift Aid benefit limits will be increased from £500 to £2,500 so that charities and museums can say thank you properly.

We will consult in the coming year on how to encourage the donations of pre-eminent works of art and historical objects to our nation in return for a tax deduction. And we will introduce from April next year this major change to our Inheritance Tax system. If you leave 10% or more of your estate to charity, then the Government will take 10% off your Inheritance Tax rate. Let's be clear. No beneficiaries will be better off. Just the charities. To the tune of £300 million. I want to make giving 10% of you legacy to charity the new norm in our country.

The third reform we make to the charitable taxes is not about the biggest donations, but the smallest. We will introduce a new scheme where Gift Aid can be claimed on small donations, up to a total of £5,000 a year per charity, without the need for donors to fill in any forms at all. That means Gift Aid on the contents of the collecting tin and the street bucket. 100,000 charities will benefit to the tune of £240 million.

Together, these represent the most radical and most generous reforms to charitable giving for more than twenty years. Do the right thing for a charity, and the Government will do the right thing by you. It's a big help for the Big Society. But our charity does not extend to those in our society who seek to avoid paying their fair share of taxes.

Tax avoidance and evasion mean that we have to ask more from working families. And that is not fair. Unfortunately, not enough has been done in recent years to tackle this injustice. HMRC estimate that £14 billion was lost through avoidance and evasion in 2008. Today we publish our new strategy paper on Tackling Tax Avoidance and we take specific measures to shut down the open abuses that have been allowed to continue for too long.

We will close down three forms of Stamp Duty Land Tax avoidance, tighten

capital gains rules for companies – and end the practice of disguised remuneration, which sees highly paid employees offered tax-free, lifetime loans that are never repaid. And we're going to tackle the exploitation of low value consignment relief that has left our high street music stores fighting a losing battle with warehouses in the Channel Islands. In total, on the numbers audited by the independent OBR, the tax avoidance measures in this Budget raise around £1 billion a year – that's £4 billion over the Parliament. We are doing more today to clamp down on tax avoidance than in any Budget in recent years.

And that gives us more resources, in a fiscally neutral budget, to help those families who do pay their taxes – but who are struggling with the daily cost of living. We have already taken steps to help from this April. I am glad to report that following measures in my Budget last year, every local authority in England has chosen to freeze council tax in the coming year. Compared to the amount council tax could rise by, this freeze will save a family in an average band D property £72 a year.

In two weeks time the child tax credit for lower income families will increase by an additional £255. I can confirm today that in the coming year all workers in the armed forces, prison service, NHS, teachers and civil servants earning £21,000 a year or less will receive a pay uplift of £250. As I said last year, the National Insurance rate rise which the last Government announced will have to go ahead. But because we have increased the threshold, it will actually be cheaper to employ people on incomes of less than £21,000 than it is today. That's how we've stopped Labour's jobs tax.

And anyone earning less than £35,000 a year will also be better off because in 14 days' time the personal Income Tax allowance – the amount people can earn tax free – will go up by £1,000. That's the largest rise in history. That means in real terms around £160 extra per year, or £200 in cash terms, for 23 million taxpayers. The Coalition Agreement commits this Government to real increases in the personal allowance each and every year.

And sets this country the goal that no one earning less than £10,000 should be caught in the Income Tax net.

This Budget today takes another step towards that valuable goal. I can confirm that from April next year the personal tax allowance will increase by a further £630, to £8,105.

That's another real increase of £48 extra per year, or £126 in cash terms. Together with this year's rise, a total of £326 extra money each year for those working hard to pay for their family's needs. And it means, just ten months into office, this coalition Government has taken 1.1 million low paid people out of tax altogether.

And one more thing. Last year, we restricted the allowance increase to basic rate taxpayers. This year we have not. The result is that there will be no more people pulled into the higher rate tax band as a result of this Budget.

Mr Deputy Speaker, let me turn to excise duties. First, Air Passenger Duty. We hoped we could replace the per passenger tax with a per plane tax. We have tried every possible option, but have reluctantly had to accept that all are currently illegal under international law. So we will work with others to try to get that law changed. In the meantime, we are consulting today on how to improve the existing and rather arbitrary bands that appear to believe that the Caribbean is further away than California.

We will also seek to bring private jets, which pay no duty at all, into the scope of taxation. The wealthiest should not escape the tax the ordinary holidaymaker has to pay.

And I can tell the House that with the hefty duty rise last year, and with the cost pressures on families, we think it would be fair to delay this April's Air Passenger Duty rise to next year.

Let me turn to duties on alcohol. We have already announced plans to increase duty on the strongest beers and cut in half the duty paid on low alcohol beers. Beyond that I can tell the House I have no further changes to announce to the rates of alcohol duty put in



place by the previous Government. As usual these changes will come in at midnight on Sunday. As announced by my predecessor, tobacco duty rates will increase by 2% above inflation.

However, it is clear that the structure of the tobacco duty regime is being exploited to produce cheaper cigarettes. So we will change the regime to narrow the differential between these lower cost brands and the rest, and between cigarettes and hand-rolled tobacco. This will reduce smoking and improve our nation's health. These tobacco duty changes will come into effect at 6pm this evening.

I turn now to other excise duties. Rates of vehicle excise duty will increase by inflation only – and we will freeze rates for Heavy Good Vehicles to help our hauliers. I am also proposing to increase the Approved Mileage Allowance Payments. This mileage rate has not increased at all since 2002, making those who depend on their car for work increasingly worse off. It will now increase from 40 pence to 45 pence per mile. And I can tell the House that we will extend this relief to cover volunteers travelling as passengers – as charities and others have been calling for over many years.

All other duty rises will remain exactly as planned by the previous Government. Except Fuel Duty. The price of petrol has become a huge burden on families. In the last 6 months, the cost of filling up a family car such as a Ford Focus has increased by £10. This rise has also hit businesses hard, especially small businesses. And it is important that when shocks like the steep rise in the oil price occur, a responsible Government is able to listen and respond. Let's be clear about what's within our control and what is not – so we don't raise false hopes.

British Governments are not in charge of the world's oil price. As we've seen, events like those in the Middle East can push the cost of petrol at the pump higher. But British Governments are in charge of the duty we levy on petrol. And the previous Cabinet put in place before they left office a new fuel duty escalator that involved seven fuel duty increases. Three have already taken

place, adding just over 3p to the price of petrol. The third step on the escalator is due to come into effect next week, and that would add almost another 5p to the price of a litre of petrol.

I have made it clear that I would listen to the concerns put to me by so many people.

Many have suggested that we should use the extra revenues we automatically get from the North Sea. It's true that they go up when the oil price rises, but the OBR confirms that rising oil prices also cause other tax revenues across the rest of the economy fall by a similar amount. I am not prepared to undermine the public finances like that. Others in this House have suggested that we create a separate VAT rate for petrol.

The Treasury has examined this proposal. It wouldn't fully offset their 5p rise that's coming. It would take six years to come into effect. And that's because it turns out to be illegal. So I have decided to reject this approach and do something different. The North Sea Oil tax regime was most recently changed in 2006, when the price of oil stood at \$66. It is now almost double that amount. That means the oil companies are making unexpected profits on oil prices that are far higher than those they based their investment decisions on.

Other oil-producing countries have a tax regime that automatically regulates returns when prices rise. We do not – and the North Seais too mature to introduce such a regime now. Instead, we can do something else. We can introduce a Fair Fuel Stabiliser.

From tomorrow the supplementary charge levied on oil and gas production will increase from 20% to 32%. Even after this, profits on a barrel of oil are forecast to be higher in the next five years than in the last 5 years. That will raise £2 billion additional revenue.

And we will use the new tax money to do this. First, we will delay the inflation rise in duty planned for next week until next year – and also delay the April 2012 inflation rise until the following summer. Second, the fuel

duty escalator that adds an extra penny on top of inflation every year will be cancelled – not just for this year, or next year – but for the rest of this Parliament. But I don't want important investment in the North Sea lost. So if the oil price sustains a fall below \$75, and we will consult on the precise figure, we will reintroduce the escalator and reduce the new oil tax in proportion.

That is how it will work. No escalator when the oil price is high. No extra tax on the profits of North Sea oil companies if the oil price falls and stays low. It's a Fair Fuel Stabiliser. And the result is this for Britain's hard-pressed families. I've made sure there will be no fuel duty rise this year. I have cancelled the fuel duty escalator when the oil price is high. And one final thing. As well as stopping these fuel duty rises I am today cutting fuel duty by 1 penny per litre. This will take effect in petrol stations from 6pm tonight.

I know that by itself this will not end the pressure on family budgets. But we've done what we can to help. Help for families. Help for businesses. A Government that listens and helps. Mr Deputy Speaker, There were some who said that this year my job was to help families with the cost of living. There were others who said 'no', my task was to back enterprise, support business and undertake far-reaching reform to help the economy grow. It is the central understanding of this Government – and core to our strategy – that these are not two separate tasks. They are one and the same thing.

We are only going to raise the living standards of families if we have an economy that can compete in the modern age. So this is our plan for growth. We want the words: 'Made in Britain', 'Created in Britain', 'Designed in Britain', 'Invented in Britain'. To drive our nation forward. A Britain carried aloft by the march of the makers. That is how we will create jobs and support families. We have put fuel into the tank of the British economy.

And I commend this Budget to the House.

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