

Alistair Brown  
Director of Financial Strategy  
Scottish Government

4 October 2016

Dear Alistair,

**LAND TRANSACTION TAX AND ANTI-AVOIDANCE OF DEVOLVED TAXES (WALES) BILL**

Thank you for appearing before the Finance Committee last week. Your experiences of the Land and Buildings Transactions Tax (Scotland) Act were valuable to us as we consider the Welsh Bill currently before us.

I mentioned during the session that there were a number of additional areas which it would be useful to seek your views upon in writing, the Committee would therefore be grateful for a written response from you on these issues.

With regards to the relationship between the Scottish Government and Revenue Scotland, it would be useful to know the extent to which the Government provides guidance to Revenue Scotland and whether the existence of the power to issue guidance restricts the exercise of Revenue Scotland's functions in any way.

In relation to relief provisions in the Scottish legislation, the Committee would be grateful if you could outline the reasoning for restricting sub-sale relief compared to the SDLT regime, the rationale for modifying multiple dwellings and acquisition reliefs to provide differing levels of relief when compared to the SDLT regime and the process for assessing the impact of such differences.

It would also be helpful if you could outline the reasoning for broadly replicating the rules regarding the notification of chargeable transactions rather than making them broader, and any lessons that may have been learnt in determining how best to provide guidance for taxpayers and agents.



Finally, you will recall that during the evidence session you agreed to provide the Committee with a note explaining:

- why the actual set-up costs for Revenue Scotland were higher than originally estimated; and
- how provisions relating to the provisional affirmative procedure for setting rates and bands are covered in the Land and Buildings Transaction (Scotland) Act 2013.

If possible, the Committee would be very grateful to receive this information by 21 October so that it can be considered ahead of our final evidence session on the Bill.

Thank you again for giving your time to meet with the Committee, your input has been very useful to us.

Yours sincerely

A handwritten signature in black ink that reads "Simon Thomas". The signature is written in a cursive style with a large initial 'S'.

Simon Thomas  
Chair

