Strategy 4 - Business Property Relief

(And why the government has now decided to phase it out)

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If you’ve been following this IHT series, you’ll have noticed a pattern emerging.

Every time a tax-efficient strategy works — genuinely works — it doesn’t take long for the government to find a way to rein it in.

It happened with trusts.
It happened with pensions.
And now it’s happening with Business Property Relief, or BPR.

The Idea Behind BPR

Business Property Relief was first introduced in 1976, when Britain was trying to protect family-run businesses from being broken up just to pay inheritance tax.

The logic made sense.

If a family had built a trading company — say a farm, a haulage business, or a manufacturing firm — it seemed unfair that, when the founder died, the heirs would have to sell the company just to pay the 40% IHT bill.

So Parliament created a simple rule:

If your wealth is invested in a trading business, it shouldn’t be taxed again when you die.

That’s the essence of BPR — a 100% inheritance tax exemption for qualifying business assets held for at least two years.

How It Works

To qualify, your money must be invested in genuine trading companies, not investment companies.

✅ Qualifying:

- Private family-run businesses (restaurants, manufacturers, tech start-ups, logistics firms).
- AIM-listed trading companies such as **Jet2, ASOS, or Fevertree**.
- Certain EIS (Enterprise Investment Scheme) shares.

❌ Non-qualifying:

- Property investment or buy-to-let companies.
- REITs (Real Estate Investment Trusts).
- Companies that mostly hold shares, bonds, or cash (so-called "cash shells").

The principle is simple: if your capital is actually working — creating jobs, trading, and producing goods or services — the government gives you relief.

If it's just sitting in passive investments, it doesn't.

Why It Became So Popular

Over the last 20 years, BPR has quietly become one of the most powerful tools in inheritance tax planning.

Unlike gifting or trusts, BPR investments don't require a seven-year waiting period. You only have to hold qualifying shares for two years, and they immediately fall outside your taxable estate.

That makes BPR a low-effort, high-impact strategy.

You could move £500,000 or £1 million into qualifying AIM-listed companies, and after two years, that entire amount becomes IHT-free.

No complex trust deeds, no loss of control, and no risk of triggering immediate tax charges.

That's why advisers — and investors — loved it.

It Worked Too Well

When a system works too efficiently, it attracts attention.

Over the past few years, tens of billions of pounds have been channelled into AIM-listed portfolios designed purely for inheritance tax relief.

It wasn't just the wealthy doing it — even middle-class investors started moving ISA money into BPR-qualifying funds.

And that's when the Treasury started to frown.

The Government Strikes Back

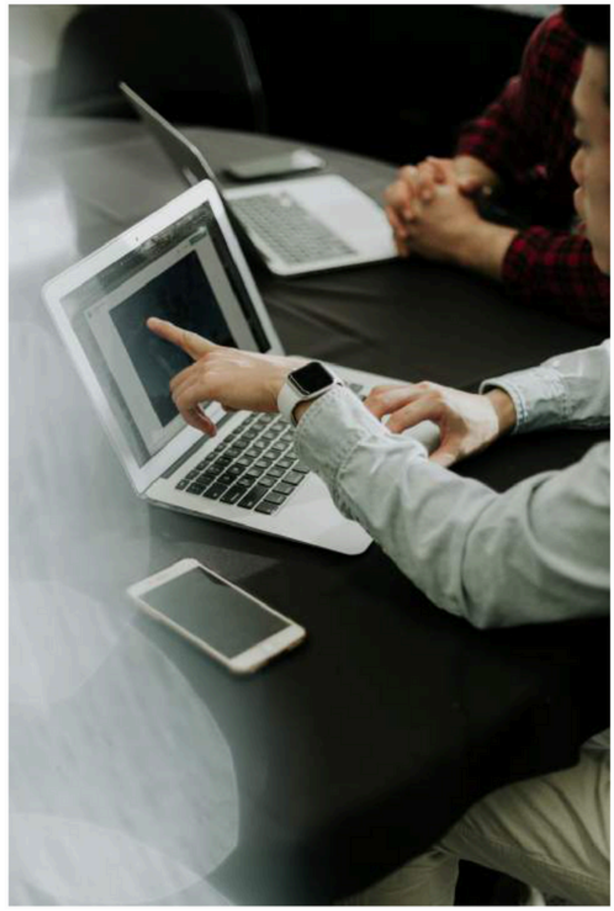
Recently, the government announced that Business Property Relief will be capped and phased out.

It hasn't been scrapped outright — but the writing is on the wall.

A new limit is being introduced, meaning only part of your BPR portfolio will qualify for relief. The exact numbers will depend on the final legislation, but the direction is clear: the days of 100% BPR exemption are ending.

It's another example of what happens when a legitimate, well-structured strategy starts costing the Treasury too much revenue.

They call it "modernisation."
I call it what it is — tax creep.



BPR vs Other IHT Strategies

To understand BPR's importance, you have to see where it sits in the broader toolkit.

Here's a simple way to think about it:

Strategy	Time to Take Effect	Control Retained	Complexity	IHT Efficiency
Gifting	7 years	Low	Low	Medium
Trusts	Immediate (complex setup)	Medium	High	High
BPR (AIM shares)	2 years	High	Medium	High

That's why BPR was often used alongside gifting and trusts, not instead of them.
Each covered a different asset type — cash, property, shares, ISAs, and pensions.

Or as I often say:

"It's not the basket. It's what's inside."

The Flexibility That Made It Dangerous

Part of what made BPR so attractive was its flexibility.

You could hold qualifying investments inside:

- A **SIPP**,
- A **Stock ISA**, or
- A standard trading account.

You could even switch between AIM shares and still retain your relief, as long as you stayed within the qualifying universe.

But that same flexibility also made it hard for HMRC to monitor.

And when too many people start using something legally but effectively, the Treasury inevitably intervenes.

That's exactly what's happening now.

A Pattern We've Seen Before

If this story sounds familiar, it should.

Every time savers find a legitimate way to reduce inheritance tax, the government eventually moves the goalposts.

Trusts were targeted in 2006.
Pensions are being dragged into estates in 2027.
And now BPR — once hailed as the saviour of small business inheritance — is on the chopping block.

It's the same pattern every time:

1. Incentivise behaviour (invest in business).
2. People follow the rules.
3. It works too well.
4. The government "reviews" it.
5. Relief gets capped or withdrawn.

What You Can Still Do

For now, BPR is still available.

If you already hold qualifying AIM shares or are invested in a BPR portfolio, you're fine. The relief still applies, subject to the two-year holding rule.

But looking forward, it's likely that:

- The **100% exemption** will be reduced.
- There may be **caps per person** or per estate.
- More **restrictions** could apply to ISAs or SIPPs holding AIM shares.

That's why now — before the new rules fully bite — is the best time to review what you have and consider repositioning while the current framework still stands.

It's not about panic. It's about timing.

The Bigger Lesson

Business Property Relief was designed for business owners — not tax avoiders.

It rewarded people who took risks, created jobs, and built something tangible.

But over time, it became a financial planning tool, and once something becomes too effective, the Treasury can't resist clawing it back.

That doesn't make it wrong.
It just means we need to stay ahead.

And that's really what all of this is about — staying informed, understanding what still works, and not waiting until the next rule change to act.

Final Thoughts

If you've followed this far in the IHT series, you'll see how each strategy fits together:

- **Gifting** removes assets slowly.
- **Trusts** protect what you already have.
- **Property structuring** prevents double taxation on the home.
- **Pensions** can still offer protection with planning.
- And **BPR** — for now — is the last piece that allows investment growth outside your estate.

Used together, they're powerful.

Used too late, they're useless.

Important Note

I'm not a qualified tax expert, and I'm not FCA regulated. Nothing in this report — or in any of the videos or materials in the Market Insider IHT series — should be taken as personal tax advice.

Everything here is purely educational, based on what I've personally seen work for families who want to protect their legacy.

If you'd like regulated, one-to-one guidance, I can connect you with one of our FCA-approved IHT specialists who can help you design a bespoke plan. This report — like all the others in the Market Insider IHT series — is designed to educate, not advise.

Strategy 4 -...

Business Property Relief (BPR) has emerged as a vital tool for inheritance tax planning, allowing family-run businesses to avoid significant tax burdens upon the owner's death. However, as its popularity surged, the government has decided to phase it out, introducing new limits that could drastically reduce its benefits. In this insightful guide, discover the history, mechanics, and future implications of BPR, and learn how to navigate the shifting landscape of inheritance tax strategies before it's too late.