

SETTING GUIDANCE FOR LIFE SCIENCES LABORATORIES

CAPITAL ALLOWANCES AND TAX RELIEF

SUPPLEMENTARY REPORT JANUARY 2025







TYPES OF TAXATION Allowances



UTILISATION OF FIRST YEAR ALLOWANCES



COST MODELS



FURTHER CONSIDERATIONS



APPENDIX



This guidance offers practical resources and an introduction to the taxation allowance opportunities relevant to all parties engaging with Life Sciences laboratory facilities -from developers, design and construction professionals to facility owners, operators and managers, as well as the science teams who will occupy the building as tenants.



DEFINING CAPITAL ALLOWANCES

Capital allowances are a valuable form of UK tax relief, available on capital expenditure incurred on assets used for business purposes.

Capital allowances are available on new build, refurbishment, fit out, construction, and demolition expenditure for all property types, with the exception of residential dwellings.

The general entitlement conditions for plant and machinery allowances are:

- A qualifying activity must be undertaken and qualifying expenditure must be incurred.
- Qualifying activities include a trade and a UK Property Business.
- The claimant must be within the charge to UK income or corporation tax
- Qualifying expenditure is defined as:

(a) Capital expenditure on the provision of plant or machinery wholly or partly for the purposes of the qualifying activity carried out by the person incurring the expenditure.

(b) Expenditure incurred by the owner of plant or machinery in the act/process of acquiring it

In the context of Life Sciences, claimants can include developers, landlords, tenants and contributors towards qualifying expenditure.

Qualifying expenditure typically falls within three main categories, namely General Plant, Special Rate Pool and Structures & Buildings Allowances, which are discussed in further detailed within this document. The rate at which the claimant is able to utilise qualifying allowances and claim tax relief will depend on the appropriate 'Pool' the relevant expenditure falls within.

By taking advantage of the current tax reliefs available, there is a significant opportunity for up to 100% of the project expenditure to qualify for Capital Allowances.

Capital Allowances are used to reduce taxable profit or, in certain situations, increase losses. Based on the current UK corporation tax rate, the cash saving benefit of Capital Allowances equates to 25% of the qualifying spend incurred.

QUALIFYIN EXPENDITU

- Main Pool Plant & Machinery
- Special Rate Pool Integral Features
- Structures & Buildings Allowances



RESEARCH & DEVELOPMENT ALLOWANCES

Research & Development Allowances are another form of Capital Allowances. They are applicable when capital expenditure has been incurred on a qualifying research and development activity, including the provision of buildings, facilities and equipment.

The definition of Research & Development (R&D), for tax purposes, follows the generally accepted accounting practice, which states:



ACHIEVING AN ADVANCE

R&D for tax purposes takes place when a project seeks to achieve an advance in science or technology.



R&D activities include those that directly contribute to achieving this advance through the resolution of scientific or technological uncertainty.



In certain circumstances, qualifying indirect activities related to the project can also be classed as R&D. However, activities, other than qualifying indirect activities, which do not directly contribute to the resolution of the project's scientific or technological uncertainty are not R&D.

Research & Development Allowances are utilised at 100% within the year the qualifying expenditure is incurred. From April 2023, a company will need to submit a 'claim notification form' before claiming R&D tax relief for the first time, or if claiming 3 or more years after a previous qualifying claim. Furthermore, from August 2023, all companies must complete and submit an 'additional information form' to HMRC prior to submission of the relevant Company Tax Return (CT600). Both forms are accessible online via HMRC's official website.

TYPES OF TAXATION ALLOWANCES

Enhanced Capital Allowances - 100% FYA

Plant and Machinery Allowances 100% FYA¹ 18% WDA

Integral Features Allow 50% FYA¹ or 6% WDA

Structures & Buildings Allowances - 3% PA ² ov 33.3 years

Research and Developm Allowances - 100% FYA

Land Remediation Relie 150% Allowance / 16% Ta Credit on losses

Revenue Deductions 100 on disposal for investors line with depreciation po for traders

Research & Developmer Relief - Current 20% tax credit (large companies ineligible SMEs) to 186% costs (eligible SMEs)

Capital

2001

Allowances Act

The Corporation

Tax (Land

2009

Revenue

Reliefs

Expenditure

Remediation

Relief) Order

	Electric vehicle charging points (currently extended up to April 2026)
or	Sanitary ware, furniture, fittings & equipment, fire alarms, security and refrigeration
ances	Air-conditioning, heating, lifts, ventilation, hot and cold water, electrical, solar shading
er	Building frame, envelope, structures
ent	Providing facilities for research and development
f ax	Asbestos, Japanese Knotweed, Hydrocarbons (e.g. Petroleum and solvents).
)% s / in olicy	Repairs, replacements, redecoration
nt able and of	Relief for R&D revenue expenditure

UTILISATION OF CAPITAL ALLOWANCES





UTILISATION OF CAPITAL ALLOWANCES

WRITING DOWN ALLOWANCES

The following example outlines the value of Capital Allowances to a UK corporation tax payer.

Based on £3m of capital expenditure, and allocating £1m to each of the main pools, the first year writing down allowance is calculated as follows:





Pools & Allowances

The following diagram provides a simple example of how Capital Allowances work in practice and the resultant savings. This example uses the standard Writing Down Allowances of 18% for General Plant, 6% for Special Rate Pool and 3% per annum for Structures and Buildings Allowances.





Corporation Tax @ 25%

£750k

Year 1 Total Allowances

£270k

Year 1 Cash Saving



UTILISATION OF FIRST YEAR ALLOWANCES





FIRST YEAR Allowances

ALLOWANCE CONSIDERATIONS

First Year Allowances provide an enhanced rate at which the claimant is able to utilise the Capital Allowances. First Year Allowances are often used as a temporary tool by the government to encourage short term investment by increasing the tax relief available in the accounting period in which the expenditure is incurred.

First Year Allowances are often introduced for a temporary 2 to 3 year period.

At the Spring Budget 2023, the government introduced two new temporary first-year allowances for qualifying expenditure on the provision of plant or machinery incurred on or after 1st April 2023. These First Year Allowances have now been made permanent for companies and those entitled can claim:

- 1. Full Expensing Allowances 100% First Year Allowance for General Plant.
- 2. First Year Allowance 50% First Year Allowance for Special Rate Plant (reverts to 6% writing down allowance in year 2 onwards)

Electrical vehicle charge points are another form of First Year Allowance. They qualify for Enhanced Capital Allowances, providing a 100% First Year Allowance.

This allowance is currently available up to 31 March 2026 for Corporation Tax purposes, and up to 5 April 2026 for Income Tax purposes

ANNUAL INVESTMENT ALLOWANCE

The Annual Investment Allowance (AIA) provides a 100% First Year Allowance on any qualifying General Plant or Special Rate Pool expenditure up to £1m per annum. There is only one AIA available per group of companies per annum.

The AIA is only available for partnerships where all the members are individuals. If two or more limited companies are controlled by the same person, then they are entitled to one AIA between them. A group can choose how they allocate the AIA.



The diagram provides a simple example of how capital allowances work in practice and the resultant savings. This example uses the First Year Allowances applicable to each Pool.



Structures & Buildings Allowances £1m

Corporation Tax @ 25%

£750k



Year 1 Total Allowances

£30k

£1.8M

Year 1 Cash Saving @CT rate of 25%

£7.5k

£382.5K

PERCENTAGES



QUALIFYING PERCENTAGES

The project type will typically dictate the proportion of total project expenditure that qualifies for capital allowances and the type of allowances available.

An existing building adapted to a life sciences use will include some structural elements. However, these will be significantly lower than the structural work required for a new build development.

Consequently the proportion of Main Pool and Special Rate Pool allowances will be higher for redevelopment. The following benchmark percentages are expected to be achieved for new build, redevelopment and tenant fit out Work:



EXISTING BUILDING REDEVELOPMENT



Tenant fit out works will largely comprise non structural items such as finishes, fitting and equipment.







COST MODELS



COST MODEL LIFE SCIENCES NEW BUILD / CORE & SHELL

The estimated allowances and cash flow benefit are represented in the below cost models. The range of allowances are for indicative purposes only. Cash flow savings are based on a Corporation Tax Rate of 25%, utilising First Year Allowances. Estimates exclude qualifying professional fees and direct orders. Cash flow excludes use of any available Annual Investment Allowance.

Shell & Core New Build (£100,000,000)	Minimum	Maximum	Mid-point
Main Pool - Full Expensing (100%)	£9,100,00	£10,280,000	£9,690,000
Enhanced Capital Allowance (100%)	£890,000	£930,000	£910,000
Special Rate Pool - First Year Allowance (50%)	£26,130,000	£26,640,000	£26,385,000
Structures & Buildings Allowance (3%)	£63,880,000	£61,970,000	£62,925,000
Total Capital Allowances	£100,000,000	£99,820,000	£99,910,000
Land Remediation Relief (150%)	£0	£180,000	£90,000
Total Tax Allowances	£100,000,000	£100,000,000	£100,000,000
Cash saving @ 25%	£25,000,000	£25,000,000	£25,000,000

Mid-point Cumulative Cash Flow	Year 1 incl FYAs	Year 5	Year 10
Shell & Core New Build (Rounded)	£6,454,000	£9,065,000	£12,110,000

COST MODEL LIFE SCIENCES LABORATORY READY AND FIT - OUT

Laboratory Ready / Fit Out (£50,000,000)	Minimum	
Main Pool - Full Expensing (100%)	£14,400,000	
Special Rate Pool - First Year Allowances (50%)	£19,000,000	
Structures & Buildings Allowance (3%)		
Total Capital Allowances	£50,000,000	
Mid-point Cumulative Cash Flow	Year 1 incl FYAs	

Laboratory Ready /	67.067.000
Fit Out (Rounded)	£7,003,000



Maximum	Mid-point
£20,700,000	£17,550,000
£22,400,000	£20,700,000
£6,900,000	£11,750,000
£50,000,000	£50,000,000

Year 5	Year 10	
£7,983,000	£8,961,000	

ELEMENTS OF QUALIFYING EXPENDITURE



LABORATORY FIT-OUT GUIDE

ELEMENTS OF QUALIFYING EXPENDITURE

This guidance has been drafted to inform what specific element items are included within each level of fit-out to aid clients and client teams to align on elements for qualifying expenditure.

KEY DEFINITIONS AND ABBREVIATIONS

S&C	LE
SHELL AND CORE	LABORATORY ENABLED
TD	WL
TENANT DEMISE	WETLABS



Each description for the level of Fit-Out is intended to be read as a stand-alone section and examples of qualification has to be reviewed on it's own merit.

Project teams and clients can make changes and adjust these definitions to suit their own requirements, but we recommend a clear schedule of inclusions and exclusions is maintained.

LR

LA

LABORATORY READY

LANDLORD AREA

DL/O

DRY LABS / OFFICE

NRM REF	ELEMENT	SHELL AND CORE	LABORATORY ENABLED	LABORATORY READY
0	Facilitating Works	 Site remediation Service enhancements Utilities upgrades 	 Site remediation Service enhancements Utilities upgrades 	 Site remediation Service enhancements Utilities upgrades
1	Substructure	 Site remediation Structural support for new plant 	 Site remediation Structural support for new plant 	 Site remediation Structural support for new plant
2	Superstructure			
2.1	Frame	 Structural support for new plant Vibration performance upgrades 	Structures & Buildings Allowances	 Structures & Buildings Allowances
2.2	Upper floors	 Structural support for new plant Plenum floors 	 Structural support for new plant Plenum floors Vibration performance upgrades 	 Structural support for new plant Plenum floors Vibration performance upgrades
2.3	Roof	Thermal improvements to existing envelope	Thermal improvements to existing envelope	Thermal improvements to existing envelope
2.4	Stairs and ramps	 Structures & Buildings Allowances 	 Structures & Buildings Allowances 	 Structures & Buildings Allowances
2.5	External walls	 Solar shading installations Thermal improvements to existing envelope 	 Thermal improvements to existing envelope Solar shading 	 Thermal improvements to existing envelope Solar shading
2.6	Windows and external doors	 Thermal improvements to existing envelope Privacy and protective window film Security measures 	 Thermal improvements to existing envelope Privacy and protective window film Security measures 	 Thermal improvements to existing envelope Privacy and protective window film Security measures
2.7	Internal walls and partitions	 Demolition & strip out Remediation of contam- inates 	 Demolition & strip out Remediation of contaminates Movable partitions 	 Demolition & strip out Remediation of contaminates Hygienic cladding systems Security measures Movable partitions
2.8	Internal doors	 Structures & Buildings Allowances 	 Structures & Buildings Allowances 	 Structures & Buildings Allowances

NRM REF	ELEMENT	SHELL AND CORE	LABORATORY ENABLED	LABORATORY READY
3	Internal Finishes			
3.1	Wall Finishes	 Structures & Buildings Allowances 	 Structures & Buildings Allowances 	 Clean room wall finishes BWIC Volumetric clean rooms
3.2	Floor Finishes	 Strip out works Carpet to landlord areas 	 Strip out works Carpet to landlord areas 	 Strip out works Carpet to landlord areas Chemical resistant vinyl Volumetric clean rooms Data room floors
3.3	Ceiling Finishes	Plenum ceilings	 Plenum ceilings Structural grid to ceilings 	 Plenum ceilings Clean room ceiling finishes BWIC Volumetric clean rooms Structural grid to ceilings
4	FF&E			
4.1	Fittings, furnishings, and equipment	 Joinery Fixed furniture and fittings Signage 	 Joinery Fixed furniture and fittings Signage Reception joinery 	 Joinery Fixed furniture and fittings Signage Lab benching Reception joinery
5	M&E Services			
5.1	Sanitary Installations	 Sanitary fittings to WC areas Joinery to WCs Cleaners sinks 	 Sanitary fittings to WC areas Joinery to WCs Cleaners sinks Tea points & Kitchenettes 	 Sanitary fittings to WC areas Joinery to WCs Cleaners sinks Tea points & Kitchenettes Shower facilities Eye wash stations
5.2	Services equipment	 Mechanical and electrical services and equipment Builders work in connection 	 Mechanical and electrical Services and equipment Builders work in connection 	 Mechanical and electrical Services and equipment Builders work in connection
5.3	Disposal Installations	 Alterations to existing buildings for the instal- lation of sanitary fittings and water connections. Mechanical condensate drainage. Lab drainage floor gullies 	 Lab drainage floor gullies Mechanical condensate drainage Dedicated chemical resistant drainage stacks 	 Lab drainage floor gullies Mechanical condensate drainage Dedicated chemical resistant drainage stacks Lab equipment drainage Chemical waste disposal
5.4	Water installations	 Hot & Cold water installations and distribution Utilities connection and services ducts 	 Hot & Cold water installations and distribution Utilities connection and services ducts Hot water generation plant and pumps 	 Hot & Cold water installations and distribution Utilities connection and services ducts Hot water generation plant and pumps Lab equipment supplies Waste effluent treatment systems

NRM REF	ELEMENT	SHELL AND CORE	LABORATORY ENABLED	LABORATORY READY
5.5	Heat source	 Heat generating plant Utilities connection and services ducts 	 Heat generating plant Utilities connection and services ducts 	 Heat generating plant Utilities connection and services ducts Lab equipment supplies
5.6	Space heating and air conditioning	 Site remediation Service enhancements Utilities upgrades 	 Site remediation Service enhancements Utilities upgrades 	 Site remediation Service enhancements Utilities upgrades
5.7	Ventilation	 Ventilation to WCs & Kitchenettes Smoke extract Risers Plenum ceilings / plenum floors 	 Ventilation to WCs & Kitchenettes Smoke extract Risers Plenum ceilings / plenum floors 	 Lab equipment extract and Distribution Ventilation to WCs & Kitchenettes Smoke extract Risers Plenum ceilings / plenum floors
5.8	Electrical Installations	 HV & LV power and distribution Electrical risers and Distribution Uninterrupted power supply Lighting and small power 	 Lab specific equipment power supplies HV & LV power and distribution Electrical risers and distribution Uninterrupted power supply Lighting and small power 	 Lab specific equipment power supplies HV & LV power and distribution Electrical risers and distribution Uninterrupted power supply Lighting and small power Data room equipment
5.9	Fuel installations if required	 Plant & machinery installations Tanks Distribution Associated builders works 	 Plant & machinery installations Tanks Distribution Associated builders works 	 Plant & machinery installations Tanks Distribution Associated builders works
5.10	Lift and conveyor installations	 Goods & passenger lifts Disabled access platforms 	 Goods & passenger lifts Disabled access platforms 	• Tanks
5.11	Fire and lightning protection	 Lightning protection system Dry risers Sprinklers, tanks and Distribution Alarms 	 Lightning protection system Dry risers Sprinklers, tanks and Distribution Alarms 	Distribution
5.12	Communication, security and control systems	 Data and telecoms installations Building security 	 Data and telecoms installations Security alarms and access controls CCTV BMS 	Associated builders works
5.13	Specialist installations	 Structures & Buildings Allowances 	CO2 detection	 Gas detection system C02 detection Microbiological safety cabinets





FURTHER CONSIDERATIONS





Definitions

Technical equipment plays a major role in science and significantly shapes modern science facilities. Within this guidance, 'technical equipment' is defined as:

- Process systems such as provision of lab-grade water or process extract ventilation;
- Science-enabling equipment such as fume hoods or autoclaves;
- Scientific equipment provided by the tenant typically bench-top and small items.

For new-builds and re-fit projects alike, technical equipment is conventionally allocated into a 'Group', dependent on which party procures and installs it, as follows:

- Group 1 specified by client/occupant, supplied and installed by the contractor.
- Group 2 specified and supplied by client/ occupant; 'free-issued' to contractor for their installation
- Group 3 specified and installed by client/ occupant, typically after the building contract works have completed

Checklist for further consideration



Qualifying expenditure includes not only the fixtures themselves, but also the associated costs. On costs such as preliminaries, builders work in connection, and overheads and profit, are also qualifying where such costs are connected with the qualifying fixture. On costs are typically apportioned across the fixtures to which they relate, and can provide a significant uplift to the value of qualifying expenditure.



Professional Fees

Professional fees, such as survey fees, architects' fees, quantity surveyors' fees, structural engineers' fees, service engineers' fees or legal costs, will also qualify for capital allowances where they relate directly to the acquisition, transport and installation of the plant or machinery.

Professional fees are typically apportioned across the plant and machinery to which they relate.



Demolition & Strip Out Works

Costs associated with the demolition of qualifying plant & machinery is treated as qualifying in the same way as the installation of such items.

Where strip out works or building demolition works are undertaken, qualifying expenditure can be identified for tax relief.





Land Remediation

Land Remediation Relief is a corporation tax relief. It is available where companies acquire land in a contaminated or derelict condition.

Qualifying expenditure is:

In the case of land in a contaminated state, expenditure on relevant contaminated land remediation undertaken by the company, or

In the case of land in a derelict state, expenditure on relevant derelict land remediation so undertaken.

When demolition or strip out works are undertaken to an existing building, acquired for redevelopment, removal of asbestos is often identified as qualifying for land remediation relief.



Capital Contributions

If a person has contributed a capital sum to expenditure on the provision of an asset, the contributor is able to claim capital allowances on their contribution sum.

The contribution is treated as qualifying expenditure in the same way as if the contributor spent the money directly on the qualifying items.

Capital contributions are often paid by landlords to tenants as an incentive to taking the lease. Such contributions are typically structured as a fixed sum towards the tenants fit-out works.







ADDITIONAL INFORMATION



SUPPORTING INFORMATION

Our guidance publications are always free and will remain this way.



SUPPORTING REFERENCES

Non exhaustive list of potential applicable regulations.

structures-and-buildings



GLOSSARY OF TERMS

Glossary of Terms

Website: https://constructingscience.com/glossary



Website: https://constructingscience.com/our-publications

Website: https://www.gov.uk/guidance/claiming-capital-allowances-for-

APPENDIX



PUBLICATION AUTHORS

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Gleeds is an international property and instruction consultancy with more than 140 years' experience in the property and construction industry. With 3,000 dedicated staff across six continents and 85+ offices, Gleeds prides itself on being a global business that is structured to act and think locally. Working with clients in almost every sector, Gleeds services the entire project lifecycle and categorises its offering into the following core areas: programme and project management, commercial and contract management, property and asset management and advisory.

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MedCity is the Life Sciences cluster organisation for London. MedCity fosters collaborations between biotech, medtech and pharma companies and the capital's Life Sciences ecosystem to supercharge innovation, drive inward investment and build skills and talent across the sector in the UK.

Working in close partnership with London's world-leading universities and national ecosystem stakeholders, MedCity creates powerful networks and partnerships to fast-track R&D, with a specialist focus on diagnostics, digital health and cell and gene therapy. As life science experts, MedCity also facilitates the development of life science space in London to support the growth of research intensive businesses.

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The company is led by a specialist management team with extensive experience developing and operating Science and Innovation buildings and campuses and integrating these into their ecosystem. We believe that sustained economic prosperity will be underpinned by growth and investment in scientific and emergent 'knowledge economy' industries. Our Mission is to become the partner of choice for the UK's research and innovation sector, supporting the entire lifecycle from discovery to R&D and manufacturing.

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