

Company reconstruction or amalgamation: transfer of development land. FA92 s67 633.—Where a company, for the purposes of or in connection with a scheme of reconstruction or amalgamation ), disposes of an asset which consists of development land ) to another company and—

(a) the disposal is not made in the course of a transfer to which section 631 applies, and

(b) the company disposing of the asset and the company acquiring the asset would, if—

(i) the definition of “chargeable gains” in section 78 (4), and

(ii) section 649(1),

were deleted, be treated in accordance with section 615 (2) in respect of that asset,

then, the companies shall be treated for the purposes of the Capital Gains Tax Acts as if the asset was acquired by the one company from the other company for a consideration of such amount as would secure that on the disposal neither a gain nor a loss would accrue to the company making the disposal, and for the purposes of section 556 the acquiring company shall be treated as if the acquisition of the asset by the other company had been the acquiring company's acquisition of the asset.