

# **Taxation of farm land let on conacre, i.e. for a season or for a period of 11 months**

## **Part 4, Chapter 8**

**This document should be read in conjunction with section 96 of the Taxes  
Consolidation Act 1997**

**Document last reviewed September 2017**



**Taxation of income from the rental of grazing and conacre land****Case 1 v Case V**

Conacre letting is a term that refers to farm land let for a season or for 11 months.

Income arising from conacre letting is “a payment in the nature of rent”, and comes within the definition of rent in section 96(1) TCA 1997.

This approach is supported by the case of *Maurice E. Taylor (Merchants) Ltd. v Commissioner of Valuation* [1981] N.I. 236. The modern conacre agreement is analogous to a lease and consequently any payment made on foot of that agreement is analogous to rent, i.e. a payment in the nature of rent.

Such income should not be included in arriving at the Case I profit (or loss) from farming, and cannot be taken into account for the purposes of stock relief or income averaging. A separate Case V computation is required.