

THE PERSONAL TAX PLANNING REVIEW

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EDITORIAL

In the first issue of this *Review* we stated that our aim was to stimulate informed discussion on UK tax planning for individuals. It is apparent from the generous response we have received from readers that the first issue achieved its purpose. We are pleased to publish two letters from readers continuing the discussion on *Rye v Rye*, examined by Hilda Wilson in the first issue, and in particular its application or otherwise to Scots Law. The Editors welcome letters on all issues raised by contributors to this *Review*, as they add considerably to the collective understanding of the topics covered.

At the time of publication the country is in the midst of election fever, and who knows what changes await us after 9th April. The Conservatives have already flagged their intention to relax the burden of inheritance tax on business property, which would create an almost unrivalled opportunity for inheritance tax savings; at the other extreme the Labour Party's alternative Budget signifies clearly their intentions regarding taxation. Whatever happens, it seems that the tax adviser will be kept busy. The next issue of the *Review* will contain articles analysing the changes which occur and the opportunities thereby created.

One of the topics close to the top of the legislative hit-list is the law of domicile, and this issue contains an article by James Kessler on the proposed reform. Not much further down the list is deeds of variation, which is a subject covered by the Consulting Editor. Professor Shipwright contributes a perceptive analysis on withholding tax and payments to authors, examining a number of difficult areas, and Roger Cockfield questions whether the legislature has provided adequate appeal machinery for VAT purposes. The practical problems created by the decision in *Smith v Abbott* are examined by Alastair Hudson, and the Managing Editor looks at the new ethical guidelines for those engaged in tax practice.

Correspondence and contributions are welcome and should be addressed to the Assistant Managing Editor, Alastair S. Hudson, 24 Old Buildings, Lincoln's Inn, London WC2A 3UJ.

Robert Venables QC
March 1992

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