

EDITORIAL

Both the Personal Tax Planning Review and the Offshore Tax Planning Review quickly established themselves in the professional marketplace as the leading publications for technical debate and analysis in relation to UK taxation. It is therefore a great pleasure for me to take over as managing editor of the two publications, now relaunched and combined into one title 'The Tax Planning Review'. The historic division between offshore and onshore tax planning is now less marked than it was in the 1990s and so combining the two titles seems to be a logical step to take.

In this issue we have a superb and comprehensive demolition of the proposed general anti-avoidance rule. You will find this article by Robert Venables QC to be an enjoyable read but it also warns of the terrors that lie in store if the rule is enacted in its present form.

Peter Vaines, barrister, discusses the forthcoming statutory rules for residence. Given his leading role in several cases relating residence, not the least the Gaines-Cooper case, his expertise in this area is second to none.

James Kessler QC examines the classification of foreign entities for UK tax purposes, a topic which is a frequent cause of confusion amongst practitioners. I admit that I have already had to revise my thinking on one aspect after reading the article!

The final contribution in this issue is an analysis by Christopher Sokol QC on the changes to the remittance basis rules in the latest Finance Act. Christopher Sokol has the almost unique ability to take the reader through careful and extensive technical analysis in a delightfully entertaining manner.

There are already articles in stock for future publication, including the impact of a farmer's ill health in old age on potential claims for agricultural property relief, and a review of the proposed changes to the income tax and capital gains tax anti-avoidance rules for offshore income and gains, in the light of the requirements of EU law.

The Tax Planning Review is open to receive suitable contributions from all practitioners; please feel free to contact me with a synopsis of any proposed article. Although the full text of each article is password protected on the internet, I have arranged for a synopsis of them to be available on the main Key Haven website so that the existence of them will be identifiable by internet search engines.

Malcolm Gunn
Managing Editor

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