
THE PERSONAL TAX PLANNING REVIEW

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From the Editors

EDITORIAL

This issue of the *Review* contains articles of particular topicality. As we write, the decision in *Ingram* is awaited and Robert Argles' article on 'Shearing and Reversionary Leases', which includes an examination of a number of alternatives to the classic shearing operation, will be of interest whatever the outcome of that case. The new issue of the Inland Revenue booklet IR20: *Residence and Non Residence* has created a good deal of uncertainty and Peter Vaines explores one of those areas - the treatment of days of arrival in, and departure from, the UK. This will be of particular importance in the context of self assessment now that Inland Revenue rulings are no longer available.

Another area of considerable interest under self assessment is the concern (not to say anxiety) about the enquiry procedures and the selection of taxpayers' returns for random examination. Nigel Eastaway's article on 'Anticipating Revenue Challenges under Self Assessment' covers this point and a number of other important aspects of Revenue enquiries under the new system.

The Consulting Editor's analysis of the state of the judicial anti-avoidance doctrines in the light of the decision in *Countess Fitzwilliam* provides an appropriate background from which to view the recent judgment of the House of Lords in *McGuckian*. Finally, David Ewart draws attention to the tax implications of the timing of disposals on divorce and casts serious doubt on the present Inland Revenue policy on the subject.

The Editors welcome contributions, particularly on points raised in articles appearing in the *Review* (or indeed other Reviews and Journals). All articles (whether long or short), ideas for articles, and other correspondence on editorial matters should be addressed to: Julian Ghosh Esq, Managing Editor, The Personal Tax Planning Review, 24 Old Buildings, Lincoln's Inn, London WC2A 3UJ Tel: (0171) 242 2744, Fax: (0171) 831 8095.

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