Welcome from the editor-in-chief, July 2016

Welcomes

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Complex solutions

There is an overwhelming theme of complexity running through our feature articles this month. Perhaps this isn't a surprise when commenting on the UK tax landscape, but with calls for simplification there seems to be a growing number of pitfalls with which a tax adviser is faced.

Harriet Brown examines the underlying principles of the main residence nil rate band (RNRB) for inheritance tax. The RNRB is a complex solution to what was a relatively straightforward problem. Although the RNRB will be welcomed by taxpayers as an additional inheritance tax relief, it will involve more difficult calculations and further claims.

Not an allowance after all?

The taxation of dividends in the hands of individuals changed fundamentally on 6 April 2016, and many advisers will have explained this to clients countless times already. Although seemingly straightforward, the changes have caused some practical issues to emerge. Jacqui Kimber examines the consequences of the new dividend allowance.

An extra layer of complexity

Another April 2016 change was the introduction of an additional 3% stamp duty land tax/land and building transaction tax for some residential property acquisitions in the UK. Juliet Minford provides an overview of the new rules and highlights that the

scope of the additional 3% charge is far-reaching and should be considered for all acquisitions of residential property.

Welcome incentive

We have also seen a new incentive for investors this April and this demands close attention to ensure access to the relief is not inadvertently lost. Caroline McCabe provides an overview of the new investors' relief and the opportunities it provides. Some of the rules are complex, in particular those on share reorganisations and receipts of value.

Comedy of errors

To add to the complexity, there is also the uncertainty that the discovery provisions bring. The provisions are a powerful weapon in HMRC's armoury and are becoming increasingly common. Keith Gordon discusses the implications of the First-tier Tribunal's decision in *Bubb v HMRC*.

Responsible tax

With increasing complexity, tax advisers have a critical role to play in helping ensure that the tax system operates in a proper way – helping governments achieve their policy objectives fairly and efficiently; and at the same time protecting the interests of taxpayers, helping them meet their compliance obligations. Chris Davidson examines the role of the tax adviser in a changing world.