

Dear Sir/Madam,

I would like to submit the following in response to the current consultation of rating policy.

- 1) The current capital value based system takes no account of the occupiers ability to pay. The rapid rise in house prices is beyond the control of most owners/occupiers, yet rates bills have been inflated as a result of the rise in capital value without a corresponding increase in household income.
- 2) The capital value of a property is based on among other things the area in which a property is situated. A family living in a public sector housing estate may thus pay less than a single person living in private sector housing. In other words, no account is being taken of the occupancy of a dwelling, or the use made of services. A family will produce more waste and avail of more services than a single person or a couple.
- 3) No allowance has been made for those on a fixed income - particularly those who fall just outside the limits for the receipt of any form of rates relief.
- 4) Rating of vacant domestic property is totally unfair as many domestic properties has been purchased to supplement pension provision and, if this measure was implemented, the executive would be targetting precisely those groups it is seeking to protect. The owners of those properties should however be billed if they require the use of any services whilst the property was vacant (for example fire service or police presence).
- 5) All households (even those on low income) should be required to pay a minimum contribution towards the rates as all households avail of the services and it is inequitable and unjust to expect those paying full rates to subsidise rating benefits. Many students work to supplement their income and as such should not be exempted from the rating system.
- 6) The relief given to agents and landlords should be reduced.
- 9) Water should be an integral part of the rate as remains the case for example for refuse collection. However we should be made aware of the proportion of rate given to each of the services, and relief given to those who reduce or eliminate their need for particular services. For example discounts should be made available for those households which produce less waste. The technology is partly present as all new bins have been fitted with a monitoring sensor.
- 10) Councils who use their income inefficiently should have their income capped until they address those problems. For instance, North Down Borough council have squandered vast sums on the Queens parade project - yet after many years development work has not started. This has resulted

in a substantial loss of revenue as many businesses were forced to close when the land was vested, and the potential rating income from new premises on the site is not being received.

11) Development land (ie that which has gained planning permission for development) should be rated, but the payment deferred until the developer gains an income from the site.

12) Councils who choose to sell assets (such as land for development) should be required to return the proceeds to the executive for redistribution as the disposal of those assets represents a loss of amenity.

13) Road charging schemes are already in place - we pay a high rate of duty of fuel, and most vehicles are required to be registered with the DVLA with the requirement to pay a road fund licence. The executive should be making representations to the Westminster parliament to ensure that all income from local vehicles remains within the province.

14) Non-resident vehicles should be required to pay some form of road taxation as they are using our local transport network.

My opinion is that a combination of a local sales tax coupled with a local income tax seems to be the system which appears to be most equitable, as it is based solely on ability to pay. I would suggest that some account be taken of the occupancy of property as stated in the foregoing.