

To..... ratingpolicy.cfg@dfpni.gov.uk

From.....Stranmillis Residents Association

Subject.....Consultation-Rates Liability in the Domestic Rental Sector.

Landlords should be liable for the payment of rates to LPS.

Option 5, Universal Owner Liability reflects our preference in Section 4.

It is a very complex system and is unfair to rate players other than Landlords who can avoid liability and are paid to collect rates on properties they both own and profit from.

Universal Owner Liability would clarify liability and simplify rates collection. It would help deter speculative landlords from eating into the stock of family/social housing profit.

No there should not be a capital value threshold.

H.M.O Landlords should not be paid a collection allowance....rather than give these landlords allowances from the public purse, there should be a strong argument for charging H.M.O landlords business rates.

Allowance to Social Sector Landlords and Housing bodies should have a sound business case showing a net benefit to the public purse.

The Department does not provide a clear guidance on liability in the landlords sector, it is overly and unnecessarily complicated and no amount of guidance will make it clear.

Definitive liability, such as Universal Owner liability, is a fair approach in the sense that all owners, whether they occupy a property or not, are liable for rates on the property they own.

Assigning liability to the owner of a property, as is currently the case for owner/occupiers and owners of vacant properties, the vast majority of ratepayers, would simplify redrafting of legislation and provide a sound framework for rate collection.

Rates should be paid on all vacant properties.(furnished or not).

We believe there are now around 6 Student Housing planning applications in the system at the moment..... all should be subject to rates.