



The Royal British Legion  
199 Borough High Street  
London SE1 1AA

T 020 3207 2361  
F 020 3207 2276  
W [www.britishlegion.org.uk](http://www.britishlegion.org.uk)

KBC CHIEF EXECUTIVE  
05 NOV 2012  
REC

Mr D Cook  
Chief Executive  
Kettering Borough Council  
Bowling Green Road  
KETTERING  
NN15 7QX

Date: 1 November 2012

Reference: 12/077

Contact: [dmartin@britishlegion.org.uk](mailto:dmartin@britishlegion.org.uk)

RECEIVED  
05 NOV 2012  
KBC CHIEF EXECUTIVE

Dear Mr Cook

### Localised support for council tax – consultation submission

As you will no doubt be aware, as part of the Government's localisation agenda local authorities are now required to design and operate their own council tax support schemes. As part of this process local authorities must consult stakeholders on the proposed design of their schemes. Please accept this letter as The Royal British Legion's submission to your authority's consultation process.

I strongly urge you to ensure that your local authority provides a 100% disregard of military compensation payments when calculating entitlement to council tax support. This includes all War Disablement Pensions, War Widow's Pensions and Armed Forces Compensation Scheme payments. These payments are not an income support payment but are paid as compensation for injury, illness or loss as a result of Service in HM Armed Forces. It is therefore not appropriate, nor a recognition of commitment to the nation, to include such compensation payments in calculations for means tested benefits.

Until the recent changes local authorities were statutorily required to disregard the first £10.00 of these compensation payments. However, following our campaigning work, almost every local authority in the country has used its discretionary power to fully disregard these payments, and this is an approach that we strongly support.

The Government, in its guidance to local authorities, provides a reminder that the discretion to provide a full disregard to them is still available under the new regulations. Indeed it encourages them to do so, in line with the principles of the Armed Forces Covenant<sup>1</sup>.

An increasing number of authorities are signing up to the Armed Forces Community Covenant and we are very grateful to those who have done so, or are looking to do so. I believe that the provision of a full disregard of military compensation payments when it comes to calculating council tax support is an essential step in delivering on the principles of the Covenant at a local level.

<sup>1</sup> Localising Support for Council Tax: Vulnerable people – key local authority duties, Communities and Local Government, May 2012.

I would be very grateful if you could confirm to me that your local authority intends to provide a full disregard of War Disablement Pensions, War Widow's Pensions and Armed Forces Compensation Scheme payments in the design of your council tax support scheme.

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Yours sincerely

A handwritten signature in black ink, appearing to read 'C Simpkins', with a long horizontal stroke underneath.

**Chris Simpkins DMA, Hon.DUniv, DL**

**Director General**



Northamptonshire Police Authority  
Wootton Hall  
Northampton  
NN4 0JQ

Telephone: 01604 888113

Fax: 01604 888114

E-mail: [info@northants-pa.gov.uk](mailto:info@northants-pa.gov.uk)

Robert Thompson  
Benefits Manager  
Kettering Borough Council  
Municipal Offices  
Bowling Green Road  
KETTERING NN15 7QX

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Sender	Direct Dial	Our Ref	Your Ref	Date
Rosemary Yule		RY/jef		31/10/12

Dear Rob,

#### **COUNCIL TAX BENEFIT SCHEME CONSULTATION**

I am writing in response to your consultation circulation of 20 September, regarding the Council Tax Benefit Scheme replacement. Please take this as the joint consultation response of Northamptonshire Police Authority and the Northamptonshire Police.

As a major precepting body, we are concerned with the forthcoming changes to the Council Tax benefit system: in particular the reduction of central government benefit costs by 10%, by passing the burden to local authorities, including police.

This burden means that, if the existing council tax benefit scheme is retained by Northamptonshire districts unchanged, we shall lose approximately £550,000 of funding for police. It is unlikely that police council taxpayers will understand that their local police force may be receiving less income to spend on policing, as a result of a reduced local tax base due to the benefit changes and insufficient benefit grant.

Given this, our starting point must be the presumption that our preferred local scheme in Kettering Borough is one which seeks to maximise the income received by the police via the tax base and government grant and does not place us in a worse funding position in 2013/14 or future years than we might have expected to be, had the changes not occurred.

It is not appropriate for us to comment on the social or socio-economic implications of the various options you have proposed, so comments will be limited to financial implications for policing.

Given the very late announcement by DCLG on 16 October of the additional £100m transitional grant scheme for 2013/14, we wish to state that our preference is for a local KBC scheme that will be eligible for the grant if this maximises overall income. We understand this to mean schemes which comply with the new criteria to limit the impact of the changes on low income households. The criteria being:

- **Those who would be entitled to 100% support under current council tax benefit arrangements pay between zero and no more than 8.5% of their net council tax liability**
- **The taper rate does not increase above 25%**
- **There is no sharp reduction in support for those entering work (i.e. the taper should continue to operate as under current council tax benefit regulations)**

As we understand it, KBC will be responsible for applying for transitional grant on behalf of the precepting authorities, including police, if the local scheme meets the Government's conditions.

We will only receive funding from DCLG for district/borough schemes which are eligible for, and have applied for, the grant. The grant will only be paid for 2013/14.

Turning to your consultation questions:

- Q1. Yes - we understand that the system will end on 1 April 2013.
- Q2. No - we do not agree with the replacement grant system, particularly given the potential impact on police funding over which we have no control.
- Q3. We cannot comment on fairness; however, we would support any decisions which seek to increase the tax base and therefore the sums due to policing, without producing undue administrative costs or bad debts that would adversely affect us through the declared collection fund surplus/deficit.
- Q4. As above.
- Q5. We cannot comment on fairness but would anticipate that a balance would need to be struck between administrative costs and collection of very minor debts if charges are applied immediately for empty properties. Ultimately this will affect police resources via the collection fund deficit.
- Q6. As before, we cannot comment on fairness of changes to the benefit scheme but we would support all KBC proposals to close the funding gap as this will ensure that policing budgets are not reduced.
- Q7. Council Tax reduction options: we support all the ten options proposed by KBC from a funding point of view, if they seek to close the gap between the reduction in our precept and the government grant payable in 2013/14.
- However, we are unclear whether some of the options - for example, no. 1 (percentage liability) and no. 10 (taper) would meet the government criteria above for the new additional transitional grant and we would need to understand the implications in due course. Would the savings from the KBC proposals be outweighed by the loss of transitional grant in 2013/14?
- Q8. We do not have a specific police view on the fairness of this approach: our support would be for changes that seek to maximise meeting the funding gap with the greatest prospect of payment and without a corresponding increase in non-payment or bad debts. We anticipate that this will not be easy.
- Q9. General Comments.: We are grateful for the opportunity to comment as a preceptor and major stakeholder and we hope that our comments will be taken into account.

We would also like to commend the very clear KBC information leaflet which was supplied to consultees, including the references to funding and police. It is helpful to remind members of the public of the link between council tax paid and police services and how issues like this may impact further than district services.

I hope this response is helpful; please contact me on 03000 111 222 x 346462 if there are any specific issues that you wish to discuss.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R Yule', followed by a period.

**ROSEMARY YULE**  
Treasurer, Northamptonshire Police Authority

c.c. Gary Jones, Northamptonshire Police  
Mark Dickenson, Kettering Borough Council



## **Robert Thompson**

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**From:** Charlotte Smith  
**Sent:** 25 October 2012 14:49  
**To:** Robert Thompson  
**Cc:** Sue Hottinger; Paul France  
**Subject:** Consultation response Proposed Local Council tax Support Scheme

### **Consultation response Proposed Local Council tax Support Scheme**

Thank you for the opportunity to respond to the proposed Local Council Tax Support Scheme.

The Housing Strategy team work with empty property owners to assist them to bring their properties back into use. We are responsible for the Empty Property Strategy and the Council's Empty Property Steering Group. We class empty properties into two types: transactional and problematic. Transactional homes are those which are empty temporarily and are brought back into use within a short time, without the need for Council intervention. Typically these properties are empty because they are awaiting sale, minor renovation works or people moving in. Problematic empty properties are those that remain empty for long periods of time and cause problems in the local communities. Issues that arise as a result of problematic empty homes can include vandalism, fly-tipping, and anti-social behaviour. The Empty Property Steering Group focus resources on returning problematic empty properties into use.

A 2008 survey, conducted by the University of Nottingham on behalf of the East Midlands Empty Property Forum, found that the most common reason stated by empty home owners for keeping their properties empty was ongoing renovation or improvement works and the associated costs. The current Council tax discount scheme for an uninhabitable property (class A) which is requiring or undergoing major repair works acts as an incentive for people to purchase and repair empty properties as it reduces their costs during the period of the renovations. Should the discount be cut we would be concerned that this will act as a disincentive for property developers to purchase and repair empty properties in the Borough, encouraging them to invest in other housing markets.

We would like to see the an uninhabitable discount remain in the Borough, even if it is for a reduced period of time, such as three months.

Introducing a 50% Council Tax premium on properties which have been empty over 2 years will act as a disincentive for landlords to keep their properties empty, which will go some way to supporting our work to bring problematic empty properties back into use in the Borough. We would welcome the opportunity to work in partnership with Council Tax to promote what we can do to assist owners to bring their properties back into use through initiatives such as our management scheme for private landlords and our landlord improvement grant.

Kind Regards

**Charlotte Smith**  
**Housing Strategy Officer (Policy & Performance)**  
Kettering Borough Council  
Municipal Offices  
Bowling Green Road  
Kettering  
NN15 7QX

Tel: 01536 534215





Mr Michael Blissett  
Newfield Lodge  
Harrington  
NN6 9NF

25<sup>th</sup> of October 2012.

Telephone (07850) 942425 email [jblissett@aol.com](mailto:jblissett@aol.com)

Dear Sir/Madam

**Proposed local Council tax support scheme consultation objection, for the attention of Rob Thomson LCTS officer Kettering Borough Council.**

Landlord forum meeting 24<sup>th</sup> of October 2012 at 10 AM. I attended this meeting and was not happy at all with it. Can you explain why you actually felt that there was no need to take any notes or minutes of the meeting when it was very important consultation meeting. I would like a reply to this? Your A4 Landlord letter of September stated in the 5<sup>th</sup> Paragraph that the meeting was to "discuss Kettering Borough Councils proposals". So notes or minutes should have been taken off landlords feelings as part of this was a statutory consultation. Had landlords been notified properly of this meeting then there would have been a lot more attending the meeting. Other landlords I have spoken to since the meeting had no idea there was a consultation going on.

How do you expect to get a true representation of people's feelings if you don't consult them Properly. I understand that this has been out for consultation since September 8<sup>th</sup>.

Why were landlords and agents not informed of the proposed changes to Council Tax Exemptions Consultation, you had all landlords contact details on your computer systems. I only found out by chance some days ago reading in the local newspaper.

The questionnaire attached to the consultation document asks questions, but does not ask for the name address and contact details or if you are a landlord of the person filling it out so could lead to people sending in multiple copies and you would not be able to pick out the genuine ones with genuine comments. The wording of some of the questions are worded in a way that a lot of people do not understand so could not give an accurate answer. How can this be a true, reliable and safe consultation.

I have been a very responsible landlord in the Kettering area for over 20 years and respect and look after my tenants. As a landlord I do not want my property's standing empty and get my agents to do all they can to get them re-let ASAP.



The exemption from 12 months to 0 is unacceptable on major refurbishment and when a property is up for sale/empty, this will stop places being fully refurbished because of cost etc and put financial hardship on people who have had to move because of job relocation etc.

The exemption of 6 months to 0 when a tenant moves out of a property is unacceptable because there is always a time-lapse on one tenant leaving and another tenant going into the property and a certain amount of work needs to be carried out before the new tenant goes into the property. If this new policy is implemented to 0 then it will lead to poor quality properties being re-let as landlords will not be able to fund repair work if they are paying Council Tax.

Further issue is the proposed reduction in the amount of benefit the tenant will be getting of between 5% and 25% so they will not be able to pay the landlord his full rent on top of the possibility of having to pay council tax on an immediately empty property's leaving the landlord out of pocket. This is going to lead to tenants on benefit being given notice to quit and landlords not renting property to people on benefits, as soon as someone goes on benefits in a property who was previously not, they will be given notice to leave the property. This is going to lead to a big queue of people on benefit on KBC's doorstep wanting accommodation because no landlords will let to them. Will you then be contacting the landlords to let the properties to these people.?

It is only 1 year to 2 years ago that Kettering Borough Council reduced the amount of money they were paying to tenants depending on how many bedrooms there were in the house, this also caused problems with tenants not having enough money to pay their rent.

Why should someone be paying Council tax when no one is living in the property and not using the services of the Council. I assume there would be no sewerage/water charges when the property is empty.

I understand that there is already a shortage of rental properties available and this will lead to a further shortage of rental properties due to people not wanting to be landlords any more.

I did ask you last week what the housing associations were doing and you did tell me that you thought they had got out paying this council tax legally because they were charities and there was nothing you could do about it, so this is leading to the small landlord picking the tab up for extra costs incurred by housing associations'. This would not be acceptable.

I do agree that some form of compromise needs to be reached. If the 12 month exemption was reduced to 6 months and the 6 months to 3 months.

Please take this letter as **my formal objection against the new proposals** to alter the Council tax exemptions/benefits etc. I have also filled out part of the questionnaires and attached it to this letter and ask that you read them as one.



Could you please confirm receipt of this letter by email to [jblissett@aol.com](mailto:jblissett@aol.com).

Kind regards

Mr Michael Blissett

**PLEASE KEEP ME UPDATED AND INFORMED OF ALL FURTHER MEETINGS.**

