

## **Department for Communities and Local Government Business Rates Consultation March 2017**

Dear Sean

We are pleased to respond to the Department for Communities and Local Government's Consultation on Business Rates: consultation on design and implementation on the locally administered Business Rates Relief Scheme (March 2017).

The Optical Confederation represents the 13,000 optometrists, 6,000 dispensing opticians, 7,000 optical businesses and 45,000 ancillary staff in the UK, who provide high quality and accessible eye care services to the whole population. The Optical Confederation also represents manufacturers, distributors and importers. As a Confederation we work with others to improve eye health for the public good.

We are a coalition of five optical representative bodies: the Association of British Dispensing Opticians (ABDO); the Association of Contact Lens Manufacturers (ACLM); the Association of Optometrists (AOP); the Federation of Manufacturing Opticians (FMO) and the Federation of (Ophthalmic and Dispensing) Opticians (FODO).

Our interest in this consultation relates to local community optical practices. Community optical practices provide essential health care to local communities by correcting sight (patient and public benefit) and identifying avoidable pathologies to prevent visual impairment and blindness (patient benefit and avoidance of significant costs for health and social care systems). Community optical practices are amongst the few remaining health care providers on the high streets and in the retail centres of our towns.

Our aim is to ensure that community optical practices are fairly protected by the Business Relief Rates Scheme (BRRS) so that these vital local health services are not forced out of business by excessive business rates increases.

We therefore welcome this business rate relief for small businesses (4.2). We also support the assumption that relief will be targeted on

- rate payers and localities that face the most significant increases in bills
- rate payers occupying lower value properties, especially where these provide an essential local service.

**Question 1: Do you agree that individual local authorities should be responsible for designing and implementing their own discretionary relief schemes, having regard to local circumstances and reflecting local economies?**

Yes. We also think that there should be guidance suggesting the sort of businesses they should consider in designing their schemes. This would be along the lines of 'In deciding on the allocation of DBRR local authorities are asked to consider access to essential basic services including NHS contractors (opticians, pharmacists dentists, etc.)'

**Question 2: Are the Government's assumptions about the design of local discretionary relief schemes reasonable?**

Yes in the main. However we believe there will be some cases where billing authorities may want or need to provide relief to those businesses whose increase falls below 12.5%, for example where this is essential to protect local health services or other businesses with similar social value, and that this flexibility should be built in.

**Question 3: Is the allocation methodology reasonable?**

Yes.

**Question 4: Do you think that local authorities should have some flexibility to switch resources between years to ensure relief by means of its local need to provide maximum value for money?**

Yes.

**Question 5: Do you agree with the proposal that s.31 grant should be paid to compensate authorities for their loss of income under the rates retention scheme up to the maximum of that year's "total pot"?**

Yes.

**Question 6: Do you agree with the proposals for administering payments, including in-year payments based on estimates, end year reconciliations and payments quarterly in arrears?**

Yes.

**Question 7: Do you agree that the grant conditions are appropriate?**

Yes.