



Transport & Mobility Forum

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Public Consultation – Response

CONSIDERATION OF A SCHEME FOR THE ABATEMENT OF RATES IN RESPECT OF VACANT PROPERTIES.

[Rates - Cork City Council](#)

Introduction

The Transport and Mobility Forum, Cork (TMF) is a cross-sectoral representative group of organisations who have a common interest in sustainable travel *. The TMF fully supports measures and policies promoting sustainable and active travel. Sustainable and Active Travel (cycling and walking) help to reduce congestion on roads, improve air quality, support a low carbon economy, reduce noise pollution and improve public health.

As such it is the TMF's aim to support the **UN's Sustainable Development Goals**, in particular SDG 3 (Good Health and Well-Being), SDG 11 (Sustainable Cities and Communities) and SDG 13 (Climate Action).

Overview and general response

Our view on the general effect of the existing rates system on transport demand and sustainable development.

Public policy should ideally incentivise positive behaviour and discourage choices which impose a disproportionate cost on society. The provision of housing, employment and services as close as possible to each other, the city centre, and public transport hubs significantly reduces the distances people need to travel in their everyday life and hence substantially reduces the economic, social and health costs of transport, while sprawl increases the distances, costs and car dependency. Ensuring that space close to the centre of the city is efficiently used for high density housing, employment and services and the displacement of these land uses to the periphery is avoided is a high priority of the Transport and Mobility Forum.

The current rates system is a significant factor in the displacement of retail and commercial business from the city to out of town locations due to vastly greater rates paid in city centre locations versus out of town retail and business parks. The system should therefore be reformed in order not to perpetuate the market distortions which incentivise out-of-town development with lower rateable values than city centre properties and hence discourage commercial development in town centres and incentivise "out of town" type developments.

The government should either;

Rebalanced the rates system to reward the location of high volume trip generators and large employment hubs close to the centre of settlements and disincentivize the location of same in an isolated out-of-town locations which are only accessible by car leading to forced car ownership.

Or move away from commercial rates and toward a system of land tax which incentivises compact development. While discouraging low density and "out of town" type development as well as vacant or underdeveloped land in urban areas in particular town centres.

Also, local authorities should be free to charge rates at a higher rate on parking spaces and that residential properties used for car parking be excluded from the residential rates exemption to reflect the costs incurred by providing for the passage of motor vehicles through communities.

Comment on the Abatement of Rates in Respect of Vacant Properties

We believe there should be no reduction in the rates bill for vacant properties because,

- The rates system should incentivise the efficient use of city centre space and disincentivise low density use, in particular vacancy
- Productive businesses providing services and employment should not be in effect subsidising property hording
- Making vacancy a financial burden will not only lower rents for small business but also encourage the repurposing of properties to housing or other uses which are in high demand and provide economic and social value
- Collecting rates on vacant sites can allow the lowering of rates for productive businesses providing services and employment
- A greater rates burden on vacant properties would encourage the meanwhile use of vacant properties by community groups and charitable organisations.

Comment on the Abatement of Rates in Respect of implementation of the National Spatial Strategy & City Development Plan commitments to compact development.

We note that Section 15 of the Local Government Rates and Other Matters Act 2019 makes specific provision that elected members of a local authority may make a scheme providing for the abatement of rates in respect of

(a) the implementation of the National Spatial Strategy within the meaning of the Act of 2000;

(b) the implementation of a development plan within the meaning of the Act of 2000;

(c) the implementation of a local area plan within the meaning of the Act of 2000;

(d) the implementation of a local economic and community plan within the meaning of the Act of 2001.

Given how central the commitment to move towards more compact walkable communities is within the current national and local documents referenced we feel it is appropriate that the elected members consider the maximum abatement allowed under ministerial order in respect of Properties in the city centre and inner city as well as high density walkable public transport hubs in the inner suburbs identified in the city development plan for high density land use.

- Which are in use and not vacant for more than 6 weeks in the year
- Are not used for car parking
- Have a high density of employment or footfall of service users

We would be obliged to further partake and feed into the discussion and planning process in the next stages to come. Should you require any clarifications, please email us at tmfcork@gmail.com.

Kind regards

Dr Darren McAdam-O'Connell (Coordinator)

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Note: *The comments within this submission are solely the view of the Transport and Mobility Forum (TMF) as a whole and not the opinion or view of any individual partner of the TMF.*

A full list of partners in the Transport and Mobility Forum can be found at

<https://transportandmobilityforum.com/partners/>