

Dear Ross

Shooting estates and the Small Business Bonus Scheme

You asked for an estimate of the amount of business rates paid by shooting estates and the amount of SBBS to which they might be entitled.

The analysis below includes all entries listed on the Valuation Roll for non-domestic rates in the following categories:

- Shooting rights
- Deer forests
- Game larders
- Deer larders

The information is drawn from the Valuation Roll dated 4 April 2023, so reflects the latest revaluation. The categories identified are consistent with the previous analysis undertaken by SPICe on shooting estates.

The number of listings on the Valuation Roll and combined rateable value (RV) for all shooting estates at 4 April 2023 is shown in Table 1.

	Number	RV (£)
Shooting Rights	10,755	11,256,581
Deer Forest	489	2,530,485
Game Larder	67	70,715
Deer Larder	16	19,390
Total	11,327	13,877,171

Table 1: Number of shooting entries and total RV

Source: SPICe analysis of Valuation Roll

As at 4 April 2023, there were 11,327 listings for shooting estates (under these categories), with a combined rateable value of £13.9 million.

Small Business Bonus Scheme

The <u>Small Business Bonus Scheme</u> (SBBS) offers a reduction on a property's nondomestic rates bill if the rateable value is below £20,000. For ratepayers with a single property that has a RV below £12,000, 100% relief is available i.e. the rates bill is reduced to zero. For ratepayers with single properties valued at between £12,000 and £20,000, relief is tapered as follows:

• from £12,001 to £15,000 - relief scales from 100% to 25% relief

• from £15,001 to £20,000 - relief scales from 25% to 0% relief

If ratepayers have multiple properties, 100% relief is also available provided that the combined value of all properties is less than \pounds 12,000. If the combined RV is between \pounds 12,000 and \pounds 35,000, relief is tapered as follows:

- is 25% on each individual property with a rateable value of £15,000 or less
- scales from 25% to 0% for individual properties with rateable values from £15,001 to £20,000

Calculating SBBS relief for shooting estates

From the information published on the VR, it is not possible to calculate the exact amount of SBBS that these properties will be benefiting from for a number of reasons:

- the public version of the VR does not link properties that have the same ratepayer, so it is not possible to identify those properties that might receive a lower amount of SBBS relief due to being part of a group of properties with the same ratepayer; however, it is possible to make some adjustments to reflect multiple ownership (see below)
- ratepayers must apply for SBBS, so the VR will identify potential eligibility but does not identify whether the ratepayer has applied for SBBS relief
- ratepayers might be eligible for other reliefs and might choose to apply for these instead of SBBS, depending on their circumstances and the value of different reliefs.

All of these points could mean that estimates based on the VR might overstate the amount of relief awarded. As such, the estimates below should be treated as a broad indication of the potential value of SBBS relief to shooting estates, rather than a precise calculation of the relief being awarded.

Table 2 gives a breakdown of shooting estates (as defined above) by RV.

Table 2. Onooting estates by fateable value			
Rateable value	Number of	As % of all	
	shooting estates	shooting estates	
<£12,000	11,253	99.3%	
£12,001 to £15,000	40	0.4%	
£15,001 to £20,000	19	0.2%	
>£20,001	15	0.1%	
Total	11,327	100.0%	

Source: SPICe analysis of Valuation Roll

As this analysis shows, the vast majority of shooting estates (99%) have a rateable value of less than \pounds 12,000 so – if they were the only property for that ratepayer – would be eligible for 100% relief on their rates bill if they applied for SBBS. A further 59 shooting estates (0.6%) would be eligible for partial relief on their rates bill (again, assuming they apply for SBBS and on the assumption that each ratepayer has only one property). Only 15 of the properties falling into the 'shooting estates' category (as defined above) would not be eligible for any relief via SBBS due to the rateable value exceeding £20,000.

Adjusting for ratepayers with multiple shooting estates

As noted above, the VR to which SPICe has access does not directly link properties to individual ratepayers. Proprietor names are shown and this would indicate that there are quite a number of ratepayers with multiple properties, but it is not possible to be sure whether these are just individuals with the same name, or whether they are the same ratepayer. Equally, some properties might be listed against different names, when they are actually the same individual/organisation. For example, there are shooting estates listed against 'RSPB', 'RSPB Scotland', 'Royal Society for the Protection of Birds' and 'The Royal Society for the Protection of Birds'. It is not possible to link these together, other than manually, which would be a very labour-intensive exercise and might not be accurate as where individuals are concerned, it would need assumptions to be made as to whether similar names are the same individuals e.g. whether A&A Morrison the same ratepayer as A&AP Morrison. For these reasons, it is impossible to do an exact match of properties and ratepayers, other than where the listed names are identical.

However, I would note that, in most cases, the combined value of the properties where the same name is listed remains within the range for eligibility for SBBS (although the amount of relief would be reduced for properties where a single ratepayer owns multiple properties). Also note that many of the multiple owners are public sector bodies, Scottish Ministers or the Crown Estate. For example, over 300 property entries are listed against Forestry and Land Scotland.

For the purposes of this analysis, I have excluded the largest property owners as they would not be eligible for SBBS due to having shooting estates with a combined rateable value of more than £35,000. These are:

- Forestry and Land Scotland
- Buccleuch Estates
- Scottish Ministers
- Glenfeshie Estate
- Reidhaven Estate
- Crown Estate
- Roxburghe Estate
- Scottish Natural Heritage
- Dalhousie Estate

This removes around 600 properties from the analysis that would not be eligible for SBSS due to being part of multiple ownership where the combined rateable value exceeds £35,000.

I have also made some further adjustments to reflect shooting estates that are listed under the same ratepayer. As noted above, this will be an approximate exercise as it is possible that there might be ratepayers with the same name, but who are in fact different individuals. Likewise, there might be ratepayers listed with different names, but who are actually the same ratepayer. Bearing in mind that caveat, and making some manual adjustments where properties are clearly under the same ownership, the analysis shows that there are just over 1,000 ratepayers with multiple shooting estates.

The majority of these individuals have 2-3 shooting estates, with only a few having more than this. Furthermore, only 63 of these multiple owners have estates with a combined rateable value of more than £12,000. So, the majority of ratepayers with multiple shooting estates will still be eligible for 100% rates relief through SBBS as the combined rateable value falls below £12,000.

For the purposes of this analysis, I have assumed that those shooting estates that are covered by a single ratepayer and have a combined rateable value of more than \pounds 12,000 would be eligible for 25% rates relief under SBBS. In reality, the relief for an individual property for these ratepayers might be lower than this if the rateable value of any individual shooting estate was between £15,001 and £20,000, as the relief would then be subject to the SBBS taper. However, the analysis above would indicate that the vast majority of shooting estates have a rateable value of below £15,000, so this seems a reasonable assumption.

Results of analysis

On the basis of the methodology outlined above, the analysis suggests that, on the basis of current valuations, the total annual business rates bill for shooting estates in Scotland in 2023-24 is estimated to be in the region of **£1.5 million**. Note that this figure is after adjusting for SBBS relief, but makes no adjustment for any other reliefs for which the shooting estates might be eligible. For example, where no commercial shooting or stalking takes place on a shooting estate, it has previously been considered to be unoccupied and therefore eligible for <u>empty property relief</u> (EPR). If there are no buildings on the land this relief was offered at 100%. If a shooting estate was likely to receive more relief via EPR than SBBS, then they might choose to apply for EPR. However, note that <u>EPR has now been devolved</u> to individual councils, so criteria might change.

In total, the analysis suggests that SBBS will be worth in the region of **£5.5 million** for the shooting estates. This is based on the assumption that all eligible properties apply for the relief. In reality, not all those eligible for SBBS relief will apply for the relief. The <u>Scottish Fiscal Commission</u> has previously estimated that there is a takeup rate of 85% from shooting estates for SBBS. If this is applied to the estimate, it would reduce the amount of SBBS claimed by shooting estates to an estimated **£4.6 million**. Note also that there is a transitional relief scheme in operation in 2023-24 which is not reflected in these calculations. This will protect properties from significant increases in their rates bill, or significant decreases in their SBBS entitlement.

Comparison with published estimates for earlier years

The PQ answer given on <u>18 May 2023</u> cited figures of £1.7 million for business rates paid by shooting estates and £4.9 million in reliefs (including SBBS and EPR). Although the estimates are broadly similar, there are a number of reasons why these estimates might be expected to be different from the calculations set out above:

- The figures in the PQ are for 2021-22, while these estimates are for 2023-24 and reflect the revaluation that has recently come into force and the current business rates and criteria for SBBS.
- As outlined above, it is only possible to make a broad assessment of the properties that will be in multiple ownership. If there are more than has been assumed in this analysis, then the amount of SBBS would be lower and the total business rates paid by shooting estates would be higher.
- The PQ figures included all reliefs, whereas the calculations above only reflect an estimated adjustment for SBBS.

Bearing all this in mind, I would stress again that these calculations should be treated as a broad indication of the amount of business rates payable by shooting estates, and the level of SBBS to which they might be entitled. They should not be seen as an accurate assessment of liabilities as the publicly available dataset does not allow for this level of analysis.

I hope this analysis is helpful. Do get back in touch if anything is unclear or requires further explanation, or if you have any further questions on this issue.

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