

## Rates comments submissions – rates policy review 2022

### Johannesburg - 2022 RATES Increases



Sally Gallagher <sally@gallaghersa.com>

To ○ Rates Comments



2/15/2022

Good Afternoon

I am a Pensioner 82 years old. I own a very old property on which I receive The Pensioner Rebate.

Johannesburg City Council will soon be following the process that leads to July Tariff Increases. I am. Therefore, writing to request that Johannesburg City Council sees its way clear to INCREASING the current threshold of R2.5 million by 14% (Fourteen Percent) at the very least

It is very difficult for me as an 82 year old to cope with the ever increasing Light and Water Costs and, if I would now lose the Pensioner Rebate because the Threshold is not increased, I simply do not know where I will get the cash from.

I look forward to receiving your acknowledgement of this email.

Yours Sincerely – Sally Gallagher

**Sally Gallagher**

Mobile: 082 654 4754

[sally@gallaghersa.com](mailto:sally@gallaghersa.com)

## FW: CITY OF JOBURG VIRTUAL STAKEHOLDER MEETING : RATES POLICY & CREDI...



Theuns <tjvb@absamail.co.za>

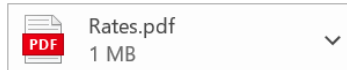
To Rates Comments

Cc melitta@jcci.co.za



2/15/2022

Some of the content in this message couldn't be downloaded because you're working offline or aren't connected to a network.



Good day JHB Rates

I have a question?

**Why is sewer cost based on the size of my stand and not the volume of water used?**

Note that I fill my pool with Council water and water my garden with borehole water.

To simply base sewer on the total water consumption is also unfair to owners in my shoes.

Some water their gardens with municipal water.

Some fill their pools and water their gardens with borehole water.

It is only myself and my wife that lives on my property.

Thus the low water consumption.

Johannesburg Water Water & Sanitation	VAT 4270191077	Sub - Total	Total Amount
(Reading period = 2021/12/12 to 2022/01/20 = 40 days)			
Meter readings and consumption: Meter no 165027944 start reading 1,499.000			
and end reading 1,516.000 = 17.000 KL - Actual Reading			
Daily average consumption 0.425 KL			
Charges for 17.000 KL are based on a sliding scale for a 40 day period			
Step 1 7.885 KL @ R 0.0000 ( Billing Period 2022/02 ) Step 2 5.257 KL @ R 20.280 Step 3 3.858 KL @ R 21.170			
		188.28	
Extended Social Package Grant		0.00	
Demand Management Levy		28.32	
Sewer monthly charge based on Stand size 1568 m2 ( Billing Period 2022/02 )		717.30	
VAT: 15.00%		140.09	1,073.99

The sewer is costing me much more than my water.



### Theuns van Brakel

Member | Principal Professional Town Planner | Pr. Pln A/900/1996 |  
Van Brakel Professional Planning & Property Services CC

**M:** 083 307 9243

**P:** 011 431 0464

**E:** theuns@vanbrakelppps.co.za

**A:** 12 Gigi Avenue, Northcliff, Johannesburg, 2195



## Question flowing from Public Meeting on 15 February 2022



Catherine Warburton <Catherine@warburtons.co.za>

To ☐ Rates ☐ Comments



2/15/2022

How will you review rates for properties where there is an appeal pending since 2018 that has not been resolved?

It seems obvious that these appeals will have to be dealt with first.

Kind regards

Catherine Warburton  
Warcomprop (Pty) Ltd  
53 Dudley Road, Parkwood, Johannesburg  
Tel: 011 447 6848  
Fax: 011 447 6868  
Cell: 082 890 6459

## Sewer charges!




sifiso Mazibuko <svmazibuko@gmail.com>

To ☐ Rates ☐ Comments



2/16/2022

 You replied to this message on 3/4/2022 9:50 AM.

Dear Coj

2 of my properties sewer charges is skyrocketing how does one object to this?

Kind Regards

Sifiso Mazibuko

GPSA

## Rates Policy



Adriano Franco <justaddlife@gmail.com>

To  Rates Comments



2/16/2022

To whom it may concern

I would like to know why sanitation or sewerage is calculated by stand size and not building size. A person with a bigger garden doesn't need more sanitation.

People are struggling economically. I'm paying almost R1000 a month for sewerage which is absolutely ridiculous. Also most of my land is not usable land, it's all rocky.

I look forward to hearing from you.

Thank you,  
Adriano

## Greenside valuations



Catherine Nixon <cnixon@mweb.co.za>

To  Rates Comments

Cc  Bridget Steer



2/17/2022

Hello

Re erf 1195 Greenside Ext 2

A comment about next year's valuation roll.

When I had our property valued last year it came in at the same value as to what you have it valued at, being R3,140,000. It seems that property prices in Greenside have not risen at all in the past few years and I would think it's fair not to increase our values based on this.

Kind regards

Catherine Nixon  
[cnixon@mweb.co.za](mailto:cnixon@mweb.co.za)  
Cell 0845499299  
Sent via iphone

## Re: Property Valuation - John Barnett Acc No 551795071



John Barnett <[johnbarnett1404@gmail.com](mailto:johnbarnett1404@gmail.com)>

To Liezl Govender; Rates Comments



2/17/2022

On Thu, 17 Feb 2022 at 13:58, John Barnett <[johnbarnett1404@gmail.com](mailto:johnbarnett1404@gmail.com)> wrote:

Dear Liezl

Thank you to you and your colleagues for affording customers your time at last night's meeting which I thought was most interesting.

As mentioned I was enquiring whether or not you would be increasing the rates rebate ceiling on property owned by pensioners like myself.

I raised a query at the time when the new valuations came out a couple of years ago and also submitted a valuation letter valuing the property at R2,8m. The property was re-evaluated and given a value of R3.1m which was still above the rebatable ceiling. My property is on a small stand for the area and does not have a pool and the house needs repairs. I would also like to point out that my wife and I normally only use the I bin..

I would like to know whether anything can be done whereby I can qualify for the pensioners rebate and what will be the rebatable ceiling for rate rebate under the proposed new dispensation.

Thank you for your interest and i look forward to hearing from you.

Regards.

John Barnett

## Rates Policy Review Process 2022/2023



Waldemar Budeli <waldemar.budeli@gmail.com>

To  Rates Comments



2/17/2022

### TO WHOM IT CONCERN

I write to submit a policy suggestion as per the invite made on 16 February 2021 at Region B Residents to a Rates & Credit Control Review Meeting at 38 Harley Street, Ferndale, Randburg.

I struggle to understand the rationale behind the City of Johannesburg's discrimination of Trusts-owned properties versus properties registered in the names of the natural persons or personal names.

Here follows the context of the above assertion: I lost my job and income three years ago. I approached the COJ offices at Thuso House, Braamfontein, to apply for Extended Social Package (ESP) assistance. I was advised of the documentation to submit, which I brought a few days later. Then I was told because the property at which I live is registered in the name of a Family Trust, my application cannot be considered. When I probed further, I was told the City's policy view Trust-owned properties as anybody's property, therefore I could not be regarded as owner or person living in the Trust-owned property.

I found the above strange because a simple test to confirm if indeed I am the person living in the property could be carried out. For instance, who has been paying the rates in the last two, or three years prior to ESP application - whatever the criterion may be that the City chooses to test its reservations than to refuse its residents benefits that they are entitled.

In my situation, I chose to register the property in the name of the Family Trust rather than in my personal name as part of my prudent Estate Planning.

I want to believe that there are other residents of the City of Johannesburg who opt for Trust-owned properties for prudent Estate Planning or other good reasons in relation to their circumstances. The bottom line is that the World Class African City must recognize that Trust-owned properties are legal in terms of the South African law, and therefore the City cannot afford to go against the law.

Hope this input will be favourably considered.

Regards

Waldemar Budeli  
083 493 0555

## Policy review Submission "Sewer, Water and Sanitation" bill



mlazondi@icloud.com

To Rates Comments; Veli Hlophe



Tue 2/22

Good Afternoon

Thank you for a very informative session with regarding to "Property Rates & Credit Control & Debt Collection Policies Review" with our community

I hereby make submission to Property Rates & Credit Control & Debt Collection as well as to Johannesburg Water, Water and Sanitation to review policy on **"Sewer monthly charge based on Stand Size"**

The submission is to review this item line from being based on **"Stand Size"** to be based on **"Water consumed by house hold"**

The current policy pays for sewer services at a fixed rate which is not in relation to water consumption of the house hold.

For it being flat rate "Sewer" item line, it becomes an unjust "secondary Rate" to a house hold

Sewer is a consumable service, used as and when reverse water runs. Therefore it is directly linked to water consumption.

**Proposal** is to bill **"Sewer Services based on Water consumed. Billed at Residential Rate"**

We trust on the water meter reading to be up to standard.

Regards

Mr Malusi Zondi

(no subject)



Ronie Pakkiri <pakkirironie@gmail.com>

To Rates Comments



Wed 2/23

I have been trying for more than a year to have my rates concession approved. The last communication I have had was that there was no policy of granting a concession to those who have bought on a 99 year lease which is strange as for all intents and purpose I own the property by paying lights, water, waste, levies and rates. I could even sell the property. I was told that there was a move to have the policy changed to accommodate a 99 year lease purchase

I have emails of correspondence dating more than a year in my possession if required.

Thanks

Ronie Mathew Pakkiri

I'd 5005055125086

PS my communications were with Tiny Sibiya and Pfano M. Which commenced on 25 July 2019 when I first made an application and after many reminders Tiny asked Pfano to follow up as thos matter is long overdue, this was on 2 September 2019 and on 9 June 2020 Tiny informed me that this matter was sent to the dept dealing with policy changes and tha was the last.

## Property Rates Policy



marileroux00@gmail.com

To ○ Rates Comments



Wed 2/23

Good day

Thank you for the Rates Policy review presented at the public meetings this week.

In the presentation is stated that the Rates Policy review process for 2022/2023 financial year is taking place under challenging conditions with which we agree.

One of the points is the **Proposed electricity increase of 20,5% for 2022/2023 financial year.**

**Herewith my proposals on how COJ can assist residents:**

1. Consider an electricity increase below inflation of 5%.
2. Consider to **lower** sanitation charges in sectional schemes with 75% as the city infrastructure has only 1 connection point at the scheme.  
The scheme is maintaining the sewer infrastructure inside the complex to each dwelling.
3. Do not implement any electricity network charges in sectional schemes as the city infrastructure has only 1 connection point at the scheme.  
The scheme is maintaining the electricity infrastructure inside the complex to each dwelling.
4. Do not implement any water network charges in sectional schemes as the city infrastructure has only 1 connection point at the scheme.  
The scheme is maintaining the water infrastructure inside the complex to each dwelling.
5. Do not increase the water demand levy or even consider removing the water demand levy for sectional schemes.
6. Consider applying that VAT be removed from these services or at least a portion thereof.
7. Consider providing incentives for solar solutions.

Kindly share my proposals with the correct department or send me the correct email address(es).

Kind regards/Groete

Mari Le Roux

[MariLeRoux00@gmail.com](mailto:MariLeRoux00@gmail.com)

072 732 7260



## Cost of Sewer



Hugo Burger <hugo.burger@unitrans.co.za>

To ☐ Rates Comments



Wed 2/23

Why do we have to pay so much for Sewer.  
We stay in a old house on a big stand.  
We are only 2 people in the house  
People with small property and more people pay less.  
**Other municipalities charge sewer based on water usage.**  
The more people in a house they will use more water and produce more sewer  
Less people in a house will use less water and less sewer.

Regards  
Hugo Burger

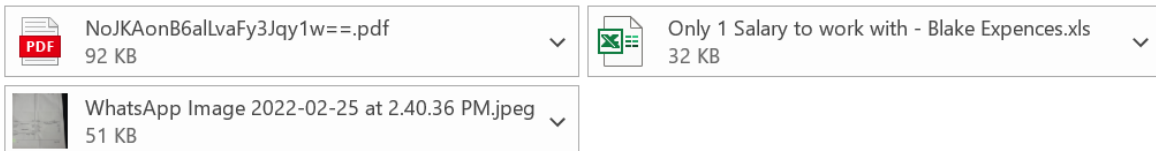
553883615 GJ Blake - 158 Progress Road, Reefhaven, Roodepoort



Ida Blake <idagjblake@gmail.com>

To ☐ Rates Comments; ☐ Credit Control Comments; ☐ Rene Fiona Benjamin; ☐ Debt Rehabilitation;  
☐ Credit Control; ☒ Madina Ramchuran; ☐ Musa Abey Makhaula

Fri 2/25



#JoburgRatesPolicy #JoburgCreditControlPolicy #JoburgDebtCollectionPolicy

Good Day All,

I hope you are all well and safe.

I would like to know if it will be possible for you to give me an answer for the below.

WHY must we pay for electricity that was the whole day off because of a fault or repairs that needed to be done and we did not have electricity for a whole day and every 2nd day the electricity was off for the MONTH of JANUARY 2022. WHY do we then need to pay. I feel very strongly about this, We are not only paying electricity for our own home, we are paying for other people to use electricity that does not get an account. The Rates and electricity accounts are very high.

and WHY is the Water meter reading now happens after 40 days. NOT 1 month is the same - 20 - 27 - 30 - 31 and now 40 days and the water meter is only read now or the estimate of the amount as they do with the electricity. I have to pay for an account that is very high because of issue that I do not have any say over it, but we are the ones that pay for it.

And does the policy have any indication regarding UNEMPLOYMENT - We only have 1 salary to work with because I do not have a salary or work. and in today's life to get a job is not that easy and I am a 51-year-old White Afrikaans Speaking Female with only Grade 10 (Std 8).

I am not 1st in the line for any interviews. That I can tell you for a fact and you are also going to use it against me and not assisting me with any of my issues.

We can only pay that we can and that is not good enough for you. NOT even in the pandemic you were prepared to assist us. You just want to keep on disconnecting us even if we pay. Life is not fair.

We pay but not good enough for you.

Kind Regards

Ida (GJ) Blake  
076 501 3783  
[ida.gjblake@gmail.com](mailto:ida.gjblake@gmail.com)

## Rates



Virginia Ferreira <virginia.f@icloud.com>

To ○ Rates Comments



You replied to this message on 3/4/2022 11:37 AM.



Wed 6:32 PM

Rates way too high. I have a retirement flat in a retirement village. So no garden for me. Pay 797.66 rates and taxes and I want to ask what we get for it. We pay for sewerage as well in levies and u also charge us. This is daylight robbery.

Sent from my iPhone

## Pensioner rebates



R Derham <derhamr277@gmail.com>

To Rates Comments

Cc VeliHlophe@joburg.org.za



Thu 12:28 PM

Dear Veli

Name : RUTH C DERHAM ID : 46 1005 0168 188  
ERF No 355 Suuidoeroord  
Account No : 501 652 800 Pin Code 289750  
Region F Ward 54

Thank you for offering to assist pensioners at the Kibler park rates meeting and taking Copy of my certified ID and application for Pensioner rebate. Im waiting with Baited Breath - saying prayers that finally rates will be deducted and if possible some credit of rates paid over the past five years. 2021/22

I realize that you must be overwhelmed with enquiries and would request that we can be given contact details for someone who can be delegated to handle this problematic process

I am aged 75, and for a FULL five years I have repeatedly applied for rebate.

SO Many times Ive been told I am not eligible then many times application has been accepted but never been effected or followed up. I have requested a reference number to confirm application but apparently this is not COJ policy....

I have spent hours at offices at both Region F and at Municipal office adjacent to city power Booyens. Many times despite staff being very helpful - facilities are not operational, computers scanners copiers - OUT OF ORDER or waiting for budget.

FIVE years and TOO MANY hours wasted. Our councillor is very aware of the problem - but advises that he cannot assist with this process.

I have no pension and since COVID the income I depended on has become inadequate to meet Expenses. my daughter helps me out and council tells me this disqualifies me - despite constant confirmation that bank account is not required when over 70.

I did check online application which STILL requests 3 months bank statement Not clearly specifying this NOT required when over 70. But most pensioners over 70 do not have access to scanners - and site is not user friendly for the older generation.

Emails to any JOC site get BOX FULL or an automated response  
In reality - IN over ten years NO one has ever responded. So a response to this email would be SO SO appreciated. I have attended every resident meeting and put in my application and been given email addresses and phone numbers - but again nothing is ever achieved.

Veli very kindly gave his phone number - but I appreciate is too busy for this number to be answered.

PLEASE PLEASE ADVISE, Who can process this rebate ?

I offered to find a scanner to take to offices. !!!!!

Yours faithfully -

R C Derham

nb I get statements by email, but find it IMPOSSIBLE to get site to accept details required to register .( Even with assistance of TECH savvy youngsters)

## Rates Comments



Buhle Khuzwayo <buhlek15@gmail.com>

To Rates Comments



You replied to this message on 3/4/2022 2:14 PM.



Thu 3/3

### Follow up on Ward 135 meeting of 02/03/2022

When increasing the rates do you take into consideration the following issues:

- Covid Pandemic
- Private sector retrenchments of our people
- Non increase of Public sector wage - Concourt decision.
- Petrol Price hikes
- Food soaring prices
- Electricity hikes

All of the above have a very negative impact on affordability which results in most households defaulting on their municipality accounts.

I suggest a Zero percentage hike if the above is taken into consideration and also support the adjustment of the rebate to be R 500 000 from R 350 000 as was suggested in the meeting. This will ease the cost to households and will afford them to pay their rates until our economy recovers. The foregoing is born from the municipality evaluations vs private evaluation and the response/explanation from your guys presenting was not convincing.

We also welcome debt rehabilitation and I'm convinced it will improve the municipality revenue in due course.

Thank you

Mr V Khuzwayo

## Fwd: Comments: COJ changes categories from Business to Residential



Mamosa Motjope <motjopem@gmail.com>

To Rates Comments



Fri 3/4

You forwarded this message on 3/4/2022 10:34 AM.

COJ Objection 806.pdf 4 MB	806 - 20190510.pdf 91 KB
1413 - 20210112.pdf 91 KB	1413 - 20210112.pdf 91 KB
1413 - 20190510.pdf	806 - COJ rates Feb 2022.pdf

Dear Rates Team

I have a query that dates back from 3 years ago where I have been submitting documentation to request COJ to change my property category from Business to residential. It has never been implemented. I am now submitting the documents for the year 2022. Please find attached all my documents to date including the forms for 2022. I went to COJ early Jan to submit the forms and nothing has been updated on my rates and yet you continue charging me business rates.

Can you please communicate.

Regards,  
Mamosa  
0795824758

## Review of Property Rates Policy



gaw31547@gmail.com

To Rates Comments



Sun 8:30 AM

This message was sent with High importance.

Appeal for an Amendment to the Property Rates Policy for Pensioners 00.pdf 94 KB
---

Dear Madam/Sir,

With reference to the Regional meetings for the review of the Rates Policy to “craft policies that are fair, equitable and affordable”, I herewith submit an appeal to review the policy with respect to pensioners 70 years and older. I have attempted to give as much background and motivation as is practical and have also given examples for a reasonable implementation. While the appeal may seem to attempt to present a legal platform, I have no experience in legal matters and have provided references only to facilitate in motivating for what I believe is reasonable and fair. As can be seen, I am also not attempting to gain an unfair advantage in avoiding Property Taxes but am simply seeking a policy that supports the objectives of the request for comments as referred to above.

Kindly give the attached your consideration and kindly acknowledge receipt of this mail.

Regards  
Gloria Williams  
083 268 6694

## **1 REQUEST OR APPEAL FOR AN AMENDMENT TO THE PROPERTY RATES POLICY APPLICABLE TO PENSIONERS**

### **1.1 Abstract**

The current Property Rates Policy caters for rebates for pensioners 70 years and older provided their property value in terms of the Metro valuation register, meaning not greater than R2,500,000. It has been previously proposed as recorded in the Mayoral Committee meeting of 19 March 2021 that "pensioner property threshold be set at R2.5 million for all pensioners, and those whose value exceeds the R2.5 million threshold would then pay rates on the remainder of the value." This suggestion has been recorded to be "noted and the necessary considerations will be taken."

This document again raises this matter for serious consideration, particularly in the light of the hardship that pensioners now face with depressed financial markets and bank interest rates, all affecting the cost of living pensioners, particularly in the age-bracket above 70 years of age, are facing.

### **1.2 Background**

With reference to the Joburg.org.za website referring to the "Property Rates Policy; Credit Control Policy & Debt Collection Policy" and document "Rates Policy 2021/22" this submission is made in terms of the request for comment as advertised for the REGION C "Property Rates; Credit Control & Debt Collection Policy Review Public Meetings" which requires these comments to be submitted "electronically by close of business on 7 March 2022 to: [ratescomments@joburg.org.za](mailto:ratescomments@joburg.org.za)".

This comment, which should be accompanied by the formal prescribed application, addresses the matter of the rebate applicable to pensioners, of which there appears to be two categories, namely those falling under section (3)(b) being 60 years and older whose joint income is in terms of subsection (c), and those falling under section (3)(c)(ii) whose income is not considered relevant with respect to the rebate. It will be to this last-mentioned group of pensioners that this appeal for a review of policy is made, namely "Pensioner rebate: 70 years old and above". The said application for a rebate cannot be submitted until there is a policy change otherwise the application would simply fail.

In terms of section 46(1) of the Act, the "market value" of a property can fluctuate depending on market forces<sup>1</sup> and supplementary valuations must take this into account when determining the Property Taxes.

### **1.3 Applicant**

I, Gloria Alice Williams: SA ID 470531 0006 085, am the property owner of the dwelling on the erf referred to in section 1.4 below. I reside at the premises with my husband and have no other secondary residence, meaning this is our primary residence. My husband is Edward David Williams: SA ID 481105 5047 084.

### **1.4 The Property**

The property in question where we now reside is portion 28 of Stand 903 Boskruin Ext 44. This property was purchased in my name in December 2012 in the sum of R2,500,000, which was above the anticipated market value limit but was considered to be a fair price, in the light of the then boom in the building industry. The declared property value at the time was R1,950,000, which would have qualified for a 100% rebate for the category of

<sup>1</sup> No. 6 of 2004: Local Government: Municipal Property Rates Act, 2004. Section 46(1) "Subject to any other applicable provisions of this Act, the market value of a property is the amount the property would have realised if sold on the date of valuation in the open market by a willing seller or willing buyer."



---

pensioners 70 years and above<sup>2</sup>. At the time of the purchase, I as the purchaser, did not qualify for this rebate.

#### **1.5 Pensioner Income**

Although pensioner income is irrelevant to the application for the rebate in question, it is fair to state that it is dependent on investments and bank interest rates. These are all under downward pressure from the COVID pandemic and current world events and it becomes relevant to our capacity to make payments, particularly when there is this apparent discrimination based on a property value that is out of the control of the property owner.

#### **1.6 The Principle of the Rebate**

The notice from the Metro derived from the Joburg.gov.za website is clear and states that the rebate is not "automatic" meaning it requires an application and this is provided on the website but cannot be completed and submitted until there is a policy change. The basis for the rebate is given as:

1. The Pensioner's age must be 70 years and above,
2. The 100% rebate is independent on income and will be granted if all conditions are met.
3. The Maximum value of the Property must not exceed R2,500,000.

The basis for the rebate, which is stated as "a right" to pensioners 70 years old and above<sup>3</sup> is not conditional on income. There is therefore no means-test to determine whether the pensioner can afford to pay the Property Rates. The only criteria is the value of the property and this is highly dependent on market forces.

#### **1.7 The Real Value of Property**

I do not claim to have in-depth knowledge of property values and the valuation criteria. I am however aware that property prices are driven by supply and demand and not by the physical components that make up the real-estate. In view of demand-side market-forces prevalent at the time of purchasing the Property, it was clear that we would be driven to a higher limit should we wish to conclude the purchase. With this in mind, when the revised Property Rates were declared, we challenged the assessed rates because they were simply

too high and not aligned to current market prices. We challenged the determined rates and were successful. This did not mean that we wished to pay more in the Property taxes but were taking a realistic view. We have subsequently learned that the two properties sold in the Estate recently fetched values considerably lower than the previous purchase price and unit 4 is a very good case in point. Its purchase price is well below the threshold of R2,500,000. There are other properties just not selling while our neighbour who have their property on sale for R2,650,000, only realised R2,250,000, and the neighbour across the road sold for R1,800,000.

From the above, it is very clear that Property Values are directly affected by market forces and other sentiments and not a number determined by some formula.

#### **1.8 Application of the Rebate**

In terms of the Metro rules, the 100% rebate applies only if the property value does not exceed R2,500,000. This is a binary condition, meaning you get the rebate, or you don't. This does not consider the capacity of the Pensioner to pay. As time goes by, the financial resources in pension funds are likely to deplete which will place further stress on the pensioner. What is more important though is the current real value of property. Placing the "peg in the ground" at R2,500,000 on an "all or nothing" basis seems unreasonable when the value could fluctuate for reasons unrelated to the attributes of the property. While I am not opposed to the payment of Property Taxes as this support the local infrastructure

---

<sup>2</sup> Category 2 Pensioners: This is not an automatic rebate. The City will provide 100% rebate to pensioners age 70 and above, irrespective of income, on condition that the maximum value of the property, does not exceed R2.5 million.

<sup>3</sup> The City will provide 100% rebate to pensioners age 70 and above, i

development and service delivery, it seems unfair to apply the full tax if the property value exceeds an arbitrarily set limit (in this case R2,500,000). According to records available to the public, there has been regular debates to amend this threshold, but this would but make the application of the rebate any more fair. It is agreed that there needs to be such a set limit but the "all or nothing" principle seems unreasonable. It would make more sense to have a sliding scale where taxes apply, should that be necessary, on the amount about the set threshold. As an example, in our case the Property value (as we have already agreed) is R2,840,000, and the threshold is R2,500,000 which would give a taxable portion of R340,000. This would be considerably more reasonable and in line with the provisions of the Property Rates Policy 2021/22 Section E (16) Residential Property 0.008220, less the first R350,000 of market value. In terms of sub-clause (a) of the "Category and Conditions (page 12 of the Policy)<sup>4</sup> covering the legislated Reductions and Rebates, the first R350,000 of the market value is exempt from property tax.

With respect to the Application process, there appears to be no differentiation of pensioners by income bracket, gender or race, but there appears to be a discrimination for age, namely:

- a) those covered by section 3 (b) which applies to those who have reached the age of 60 years and occupy the property<sup>5</sup>, and
- b) those covered by section 3(c)<sup>6</sup> which is independent of income and only dependent on the property value. What is interesting to note is that sub-clause 3(b)(i) stipulates age, (iii) stipulates maximum property value, and (iv) obligates the applicant to proof income but sub-clause 3(c) only stipulates age and removes an obligation with respect to income declaration.

In terms of PAJA s1<sup>7</sup> it is understood that the application of rebates is an administrative action and in terms of s3(1) should be procedurally fair<sup>8</sup>. The preamble to the Act<sup>9</sup> states that there should be "a transparent and fair system" for determining rebates<sup>10</sup>. It is with this in mind that I submit this appeal for a review of the Property Rates Policy, which does have a direct effect on my current conditions for the payment of Property taxes. This is not made with the view of avoiding obligations but for the fair application of the rules. The simple determination of the property value based on sales price does indicate that this amount can vary upwards and also downwards. In addition, there is no knowing what the impact of the current State of National Emergency will have on property values in the long-term, or any

other market force for that matter. It is certain however that current financial forces are going to adversely affect our ability to pay, particularly with respect to investments and bank interest rates, which directly affect the amount of pension on which to live. On this basis I hereby request that the Authority to review the condition for granting the rebate to

<sup>4</sup> Section B: Categories and Conditions of Ownership for Purposes of Exemptions, Reductions and Rebates for Residential Category. (a) The City will not levy a rate on the first part of the value up to R350 000 of the market value as per the Valuation Roll:

<sup>5</sup> Section B clause 3 Owners dependent on pensions (a) This category consists of residential properties owned and occupied by pensioners. (b) The conditions for this rebate are as follows: (i) The owner must have reached the age of 60 years: (ii) Must occupy the property (iii) The value of the property may not exceed R2,500,000.

<sup>6</sup> (c) The rebate shall be as follows: (i) If a pensioner only receives a National Security Grant, they will qualify for a 100% rebate. (ii) If a pensioner, age 70 and above, they qualify for a 100%, irrespective of income.

<sup>7</sup> PAJA s1 "administrative action" means any decision taken, or any failure to take a decision, by – (a) an organ of state, when – (i) exercising a power in terms of the Constitution or a provincial constitution; or (ii) exercising a public power or performing a public function in terms of any legislation;

<sup>8</sup> PAJA 3. Procedurally fair administrative action affecting any person (1) Administrative action which materially and adversely affects the rights or legitimate expectations of any person must be procedurally fair.

<sup>9</sup> Act No. 6 of 2004.

<sup>10</sup> Local Government: Municipal Property Rates Act No. 6 of 2004: Preamble "To regulate the power of a municipality to impose rates on property; to exclude certain properties from rating in the national interest; to make provision for municipalities to implement a transparent and fair system of exemptions, reductions and rebates through their rating policies; to make provision for fair and equitable valuation methods of properties; to make provision for an objections and appeals process; to amend the Local Government: Municipal Systems Act, 2000 so as to make further provision for the serving of documents by municipalities; to amend or repeal certain legislation; and to provide for matters connected therewith."



pensioners 70 years and older.

It is noted that at the Mayoral Committee of 2021-03-19<sup>11</sup>, it was suggested that the pensioner's rebate be reconsidered, and the City would give consideration to this.

I propose that the rebate should be applied in terms of a market-related and reviewable property value, and that a formula be applied similar to that used in section B sub-clause (a) of the General Rules for Rebates. A fair and equitable proposal is as follows:

- a) There is the rebate applicable to the first of R350,000 of the market value of the Property. This must remain as it is partly current policy and also the Law.<sup>12</sup>
- b) With respect to pensioners 70 years and older, there is a defined "Base value of Property subject to Rebate", and currently this is R2,500,000.
- c) Those whose Properties are valued below the "Base value of Property subject to Rebate" currently will not pay any property tax. This should remain to avoid negative reaction.
- d) There has been debates around adjustments to the threshold Property value eligible for rebates, but this should be discouraged in favour of making the application of the rebate more fair.
- e) Because of the legislated rebate on the first R350,000 of the Property Value, the Base-value of Property not being subject to tax, should be set so that the threshold on property value for a 70-year+ pensioner rebate should be adjusted so that a property of value R2,500,000, or an amount as determined by the Authorities, return a zero Property Tax.
- f) This would mean that the "Market Value (as reflected on the Metro Property Register)", will be subjected to a test, to determine whether a rebate is applicable.
- g) If the "Market Value (as reflected on the Metro Property Register)" is greater than the "Base value of Property subject to Rebate" plus the "Legislated Value", then the Property Tax would be the difference between these two amounts times the applicable tariff, otherwise the Property Tax would equal zero.
- h) For this to work the "Base value of Property subject to Rebate", currently set at R2,500,000, would need to be reduced to R2,150,000, using current amounts.

- i) When applying the Property Tax calculations, the formula would be:

If the "Market Value (as reflected on the Metro Property Register)" is greater than the "Base value of Property subject to Rebate" plus R350,000, then the Property Tax = (Market Value [as reflected on the Metro Property Register] – "Base value of Property subject to Rebate") times the "Applicable tariff".

Applying this formula would result in all recipients of the 70+ year receiving a 100% rebate will continue to do so. Those with property values greater than R2,500,000 will start to pay taxes in terms of the current schedule of rates (currently 0,008220) on the Taxable Portion of Property Value.

Example 1: Property Owner age = 70, Property value = R2,400,000

The Test: Property Value = R2,400,000 > R2,150,000+R350,000, Test fails returning a Zero Property Tax

Example 2: Property Owner age = 70, Property value = R2,600,000

The Test: Property Value = R2,600,000 > R2,150,000+R350,000, Test passes

Property Tax = (R2,600,000 – (R2,150,000 + R350,000)) \* 0,008220 = R822 per annum or

<sup>11</sup> Mayoral Committee 2021-03-19: Draft 2021/2022 Property Rates Policy and Rates By-Laws: there was a suggestion/comment that "It was suggested that pensioner property threshold be set at R2.5 million for all pensioners, and those whose value exceeds the R2.5 threshold would then pay rates on the remainder of the value." The City's response as recorded was "This suggestion was noted and the necessary considerations will be taken."

<sup>12</sup> Property Rates Policy "(a) The City will not levy a rate on the first part of the value up to R350 000 of the market value as per the Valuation Roll."

R68,50 per month.

Example 3 (Which would be my case): Property Owner age = 70, Property value = R2,840,000

The Test: Property Value = R2,840,000 > R2,150,000+R350,000, Test passes

Property Tax = (R2,840,000 – (R2,150,000 + R350,000)) \* 0,008220 = R2,794.80 per annum or R232.90 per month.

**From:** leon.nel@cornerstonellp.co.za <leon.nel@cornerstonellp.co.za>  
**Sent:** Sunday, March 6, 2022 2:25 PM  
**To:** Rates Comments <Ratescomments@joburg.org.za>  
**Cc:** Melanie Nel <melanie.nel@cornerstonellp.co.za>; 'Candice' <estates@randjes.co.za>  
**Subject:** COJ Proposed Rates Increases Comments: Ward A

To whom it may concern,

I hereby submit the following comments to be considered during the following proposed rates increases:

1. The COJ made it clear that rate-&-taxes are obligated by law. It is important to be clear that these rates-&-taxes are charged for services which are to be provided to the taxpayers by the COJ, i.e.,:
  - a. Sewage infrastructure
  - b. Stormwater infrastructure
  - c. Road infrastructure and maintenance (including streetlights, sidewalks, road signs, etc.)
  - d. Etc.

Many citizens (such as myself) live on residential agricultural holdings, have had zero services and gravel roads (with zero maintenance) whilst paying rates-&-taxes for many years and sometimes a few decades. The only services available are electricity, potable water, and rubbish removal - these are however all being charged and paid for separately and cannot be included in the definition of services pertaining to rates-&-taxes. **I hereby request that properties which receive zero services from the COJ, receive the benefit of not having increases on rates-&-taxes until such time when services are provided.**

2. There is not enough transparency on how taxpayers' money is spent for rates-&-taxes. **I hereby request an annual report of proposed services to be installed (per region) in the year to ahead, as well as an annual report of what services was actually installed in the year that passed.**
3. Rates-&-taxes are currently being calculated on (1) property category, (2) property value, and (3) the annual rate increase percentage. This seem very unfair as citizens who invest in the community by increasing the value of their property are penalised. In addition to this, properties are re-valued and there is a rate increase every 4 years. The effect of this is that the property value increases whilst the rates are also increased – therefore the taxpayer effectively receives a double increase. To be fair only one factor should increase at a time, not two (or more). **I request that only a rate increase be implemented, and that property value be discarded when calculating rates-&-taxes.**
4. For all practical reasons, rates-&-taxes are charged for services rendered. Therefore, a property should be taxed according to the number of services it utilises. A residential agricultural stand with a 4-bedroom house and zero services cannot be charged more than a 1000 square meter residential stand with a 4-bedroom house receiving all services. Similarly, a 4-bedroom house receiving all services. Similarly, two identical residential stands and houses, cannot be expected to pay the same if there is one family in one, and 4 families living in the other – the latter puts far more pressure on the services infrastructure. **I suggest considering an even better method for determining (than mentioned in point 3 above) rates-&-taxes would be to base it on (1) property category, (2) available services, (3) number of occupants.**

I hope that you can favourably consider the above and provide feedback to us.

Thank you.

Yours sincerely,

Dr Leon Nel (BVSc Pret; N.Dip. Civil Eng.)

Director  
c: + 27 (0) 83 695 1381 t: +27 (0) 11 238 7031  
e: [leon.nel@cornerstonellp.co.za](mailto:leon.nel@cornerstonellp.co.za) w: [www.CornerstoneLLP.co.za](http://www.CornerstoneLLP.co.za)  
28 Hawaii Ave, Randjesfontein Country Estate, Midrand, 1683, South Africa



making a difference that matters  
>> BBBEE Level Four

**From:** EgonBrenda Hinze <eb.hinze66@gmail.com>  
**Sent:** Monday, March 7, 2022 1:36 PM  
**To:** Rates Comments <Ratescomments@joburg.org.za>  
**Subject:** 401781584

Good Day

I hereby would like you to consider not to increase the rates and taxes (401781584). The country is still going through work loss due to the covid-19 epidemic and everybody is having problems to meet every responsibility they have got. With the new economic problems that the world is going into with more increase due to the uncertainty in Ukraine and Russia. The 5 flats on this property are not the best of the best in this area. Here are my rate and tax numbers. 403931362, 403931373, 403931387, 403931394 and 403931404.

I hope you do consider the country's (world) crises.

Regards  
Brenda Hinze  
083 250 4819

Subject      FW: Rates Rebate for Over-80s

**From:** Patrick Palmer <patrick.hp@gmail.com>  
**Sent:** Monday, March 7, 2022 1:41 PM  
**To:** Rates Comments <Ratescomments@joburg.org.za>  
**Subject:** Rates Rebate for Over-80s

*To Whom it may Concern*

I should like to comment, please, on the management of the Rates Rebates for the Over-80s

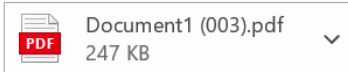
1. In 2013/14, my Rateable Value was R1.97m, and the 100% Rebate Ceiling for the over-80s was R2m. So I, fortunately, was not obliged to pay Property Rates.
2. In 2017/18, Joburg's domestic rateable values were increased across the board by about 50%
3. To be commensurate with this 50% average increase, the 100% Rebate Ceiling for the over-80s should also have been increased by 50%, to a figure of R3m.
4. The rebate Ceiling for the over-80s, however, was increased by only 25%, to a figure of R2.5m.
5. The result was that many new rateable values - which had previously been below the over-80s ceiling of R2m - now became greater than the new ceiling of R2.5m.
6. Many over-80 Senior Citizens, who were now 5 years older and 5 years poorer (due to inflation), were still occupying *exactly* the same premises as they had occupied before, but they were suddenly obliged to start paying Property Rates of greater amounts than they ever had paid before.
7. I request that the 2022/23 100% Rebate Ceiling for the over-80s should be calculated on a basis of R3m, augmented by the average percentage increase of the 2022/23 Rateable Values.
8. This will "level the playing field" to where the over-80s 100% Rebate Ceiling should equitably be in 2022/23, based upon its having been R2m in 2017/18

Kind regards

*\*Patrick Palmer*

Subject

FW: Comment on Rates and Credit Control/Debt collection policies 7 March 2022



**From:** David Tucker <esti@tiscali.co.za>

**Sent:** Monday, March 7, 2022 9:11 PM

**To:** Rates Comments <Ratescomments@joburg.org.za>; Credit Control Comments <CreditControlComments@joburg.org.za>

**Subject:** Comment on Rates and Credit Control/Debt collection policies 7 March 2022

Herewith comment on the Rates and Credit Control/DebtCollection Policies for the 2022/23 financial year.

Kind regards

David Tucker  
Specialist Title Consultant  
Cell : 076 633 4834  
Email : [esti@tiscali.co.za](mailto:esti@tiscali.co.za)

#### **COMMENT ON RATES AND CREDIT CONTROL/DEBT COLLECTION POLICIES**

##### **7 MARCH 2022**

##### **1. Comment on Rates Policy**

The new rates policy provides for a new category of "Industrial". There will need to be a corresponding category of "Sectional title industrial" to provide for sectional title units in, for instance, an industrial or factory park.

##### **2. Comment on Credit Control and Debt Collection Policy**

Subject      FW: Rates Comments

---

**From:** Danica Rodgers <rmdm0970@gmail.com>  
**Sent:** Monday, March 7, 2022 10:09 PM  
**To:** Rates Comments <Ratescomments@joburg.org.za>  
**Subject:** Rates Comments

Goodday,

I am writing to you as I would like to comment on the property categories for the valuation of properties.

There is disparity in the current category valuation structure, particularly in light of the drive towards extreme densification of Johannesburg which dramatically increases the revenue earned by the city.

The current system is far too broad in its classification of residential properties; the actual value of standalone properties in residential neighbourhoods is being negatively impacted by the densification of the suburbs. Property values of standalone houses in these densified areas either stagnate or in most cases drop significantly.

The problem is further exacerbated by the fact that cluster properties and apartments tend to be in higher demand in the market and so have a higher market value than standalone homes; rates when calculated are based purely on market value and the Residential and Residential Sectional Title categories have the same ratios and tariff rates.

Compounded to this is the fact the valuation of the property for the rates calculation is not taken in relation to the same level or category; so by the fact that a three bedroom cluster property recently sold in the area for R 3,5 mil it determines the value for the rest of the properties in the area as being at the same value if they too are 3 bedrooms. This is not an accurate assessment and there needs to be a better system for calculating the valuation of a property so that properties are evaluated in an apples for apples comparative basis i.e. clusters with clusters, standalone houses with standalone houses and apartments with apartments.

Furthermore, for many many years we have heard that COJ has trouble with payment of rates. With the densification of properties and therefore a greatly increasing client base would it not make more sense for the tariff rates to be substantially reduced thereby reducing the heavily burdened property owners and in so doing possibly making it possible for ratepayers to meet their obligations and so increasing the monthly

revenue of the City. The city would need to put in far less effort to get in revenue. This would also then no longer be a deterrent to first time home buyers as rates and taxes would not be so burdensome and many would take the opportunity to build a legacy for their futures rather than to continue paying rents.

Lastly I believe that there should be incentives built into the tariff system for example making improvements to your property, looking after your curb and neighbourhood, recycling your waste to mention a few, any action that improves the city and makes the management of the City easier for the COJ should be encouraged and incentivised . We should be a forward thinking society and there should be encouragement for the citizens to start thinking about each other and their future.

I strongly believe that the current categorisation system and tariffs structure should be completely reassessed going forward, currently the system is far too one size fits all. I believe that a new system applied correctly would have a greater opportunity at earning higher revenues while reducing the actual costs paid by each individual property owner.

Sincerely  
Ms [Rodgers](#)

Subject      FW: Rates comments - suggestions to revive deteriorating areas

---

**From:** Brian <brian@zmco.co.za>  
**Sent:** Monday, March 7, 2022 10:37 PM  
**To:** Rates Comments <Ratescomments@joburg.org.za>  
**Cc:** Daniel Schay (CIlr) <danielschayward72@gmail.com>; brian massey <zmco@iafrica.com>  
**Subject:** Rates comments - suggestions to revive deteriorating areas

Dear Ratescomments,

I appreciate the opportunity to make suggestions at the policy review meetings last week via Microsoft Teams, which I am summarising and expanding a bit for you in this email.

1. It is most distressing to see once vibrant business areas going into decline with businesses going insolvent or moving to other areas. Some of these premises are abandoned or vacant or have been hijacked and electricity and water illegally stolen. In previous years I made comments that even if zoned business and they changed to residential they should be charged residential charges not only for rates but also for water, electricity and other services. This was implemented but with a lot of red tape and required permissions again and again. It also came too late and the decline had set in. My suggestion now is that ALL



properties business and residential in areas going down – most particularly along the once vibrant Louis Botha Avenue – should be charged residential rates not only for rates but also water, electricity and other services. I believe such a step will keep the remaining businesses and even draw back many small businesses where the owners would rather own their own premises, look after them and not pay rent to a landlord. It is no good for Jo'Burg City to waste time and create extra red tape. It is much better to be proactive and to just do it as quickly and simply as possible in every area going downhill. It is no good having “debt rehabilitation” and extra red tape when the businesses are already terminal. Rather be proactive.

2. Having viable thriving businesses in residential areas is a huge plus for the locals in the areas and should be extended further. Many businesses are struggling and our unemployment is staggering. I believe the business rates and charges for electricity and water and other services are too high and everywhere the charges should be the same whether for business or residential purposes. I don't think you should regard this as a give-away. Half a loaf is better than none and I believe the businesses and residences will thrive and Jo'Burg will in the long run earn more. There should not be any zoning issues or permissions needed as long as the business does not create a nuisance it should get the go-ahead from the council.
3. The council comes up with schemes to renew these areas which cost a fortune like the Corridors of Freedom but these involve a lot of red tape and take time to bear fruit. Rea Vaya along Louis Botha Avenue may one day be an asset to the street but it has taken a long time to get half-finished and has been a major factor in driving businesses out the area and accelerating the decline. A simple solution of cutting charges to businesses will bring huge immediate benefits and results with a minimum of red tape.
4. I also believe that there should be much fewer categories for charging rates, water, electricity. No-one can understand or remember it all and even your council staff struggle and charges require audits and

corrections and inefficiency in the council and a nightmare for owners whether business or residential. Eliminating this nonsense will make things easier for your officials, businesses and residents. Many incorrect amounts get charged and owners face a huge inefficient bureaucracy resulting in huge bills and uncaring, uninterested officials and properties being abandoned. Rather make it easier for your own staff and have a smaller more effective organisation and lower rates and charges to the citizens. It is also important not to try and squeeze ratepayers for every cent. Rather keep charges lower reduce your staff expenses and have an easy to run organisation and then only spend what you collect don't dream up grandiose schemes that cost a lot require a lot of red tape and permissions and often do more harm than good. Be very careful in how you spend ratepayer money.

5. I have intimate practical experience and knowledge in what I am writing. I have owned two properties along Louis Botha Avenue Fellside and one in Second Street Orange Grove (facing Louis Botha Avenue) for nearly 40 years. I had them all rezoned for business at great expense. One of these I used for my accounting practice for 20 years but because the area was no longer attractive for business I now let it out for residential purposes. The second I used for 10 years to run a business college but I now also rent it out for residential purposes. The third property is still a business but I am 80 years of age and when I decide to sell it which might be soon I doubt if a new owner will want to remain in the area. Although this property is rezoned as business the council have been charging residential rates for some years. Last month they conducted some sort of audit and charged increased water rates for three years. They have now told me that they are planning to increase the business charges for the other services too. The council says they will offer terms but this is a huge setback too what with the pandemic, lock downs and now the war in Ukraine. I cannot understand the stupidity of this. If it happened to me it will happen to others and the few good businesses in the area will go bankrupt or will flee to “better areas “. Many struggling owners will not pay

6. It is very important for residents, businesses and employees to have a vibrant Main Street in every suburb. Everywhere you look there are empty business premises going down in value even in George Street Raedene for instance. Even in large shopping centres like Balfour Park Mall there are many vacant shops. I implore you to reduce your charges for businesses to the same rates for all services to the same as for residents and to simplify and streamline your charges both to residents and businesses and to make your own bureaucracy simpler for yourselves and your customers. Don't be greedy. Don't waste a cent of ratepayer money not from corruption nor due to inefficiency, red tape or bureaucracy. I wish you well. I hope to see JoBurg becoming a prosperous happy city and a good place for all of us to live and to do business.

Best regards,

Brian Massey  
37 Long Avenue  
Glenhazel  
Mobile and WhatsApp 082 854 5702



## LATE SUBMISSIONS

09 March 2022

### Rates and Tax



Boitumelo Dilapiso <bdilapiso@gmail.com>

To ○ Rates Comments



Wed 9:02 AM

Good day Madam/sir

Im submitting

Can city of Johannesburg R350 000 to R500 000 residential sense our resident affect by COVID19 because 350.000 its only accommodate RDP's people who Owen's Bond house does not benefit and the buy water and Electricity prepaid.

Most is young people.

The 2% increase can not increase because most residents are being affected by 2 Years lockdown And we dd not take part

Can city of Johannesburg introduce Act against all WARD CLLR's before being the can swear counsellor's must make sure the on good standing with rates and tax

Because the leading us

Rebates can city of Johannesburg make sure it work for oir people nd train staff on it so it can benefit our community

Thanks

Boitumelo Dilapiso

---

### Rate increases



Tinky & Peter Day <meaddays@iafrica.com>

To ○ Rates Comments



Wed 10:29 AM

Dear Sir/ Madam

Rate increases are unacceptable , we receive NO services from the City of Joburg .

Expecting huge rates for no services provided is FRAUD.

We had a community meeting recently , all present were not in favour of COJ, our dissatisfaction was passed on to our local councillor.

Kindly take action

Tinky Day

Tinky & Peter Day

Meadowsweet Farm, 9 Howard Avenue, Eikenhof, 1872

Tinky: 082 767 6976

Peter: 082 450 6540