Encouraging Business Growth and Job Creation
Debate on 11 July 2019

Summary

This House of Lords Library Briefing has been prepared in advance of the debate due to take place on 11 July 2019 in the House of Lords on the motion moved by Baroness Neville-Rolfe (Conservative) that "this House takes note of the case for creating an environment which encourages (1) business growth, and (2) job creation, especially in relation to the tax system".

The UK ranks highly in international pro-business league tables. However, the UK economy faces a number of challenges. These include low GDP growth and productivity, and historically-high levels of employment, but low-skilled and low-wage jobs in some sectors. Other challenges include the potential impact of the UK's withdrawal from the EU. To address these, the Government has launched its industrial strategy, which aims to increase investment in infrastructure and skills to encourage growth and job creation.

Since the 2008 financial crisis, the UK's corporation tax rate has been reduced from 28% to its current rate of 19%. It is due to reduce to 17% in 2020. Corporation tax receipts are now at their highest ever level. However, there is debate over whether the tax rate reductions have resulted in greater business investment in the UK. Over the same period, employers' national insurance rates have increased. This has provoked criticism that the burden of business taxation has been shifted from shareholders to employees. Similarly, business rates receipts have increased, placing a separate cost burden on businesses, particularly small- and medium-sized enterprises in the retail sector.

This briefing focuses on the UK's business taxation regime. It provides information on the three most substantial business taxes (in terms of revenues raised): corporation tax; employers' national insurance contributions; and business rates. The briefing also summarises proposals for reform of these taxes. Additional sources on encouraging business growth can be found in the further reading section.

How Business-friendly is the UK?

Several factors affect the level of investment and business growth in a country. The Organisation for Economic Coordination and Development (OECD) has stated that investors are attracted to countries which have:

> Access to markets and profit opportunities; a predictable and non-discriminatory legal and regulatory framework; macroeconomic stability; skilled and responsive labour markets; and well-developed infrastructure.[1]

In recent years the UK has ranked highly in a range of international assessments of countries' pro-business policies. The World Bank has published an annual 'doing business' survey since 2003. The survey assesses eleven "ease of doing business" indicators. These include: the barriers to starting a business; paying taxes; protecting investors; enforcing contracts; and labour market regulation.[2] The 2019 edition ranked the UK 9th out of 190 countries, behind New Zealand (in 1st place), followed by Singapore, Denmark, Hong Kong, South Korea, Georgia, Norway and the United States.[3]

The UK-based free market think tank, the Legatum Institute, publishes an annual 'prosperity index'. This ranks countries based on an assessment of "nine pillars" of prosperity, including their: business environment; quality of governance; personal freedom; safety and security; and education provision. The 2018 index ranked the UK 7th out of 149 countries, a decline compared to its 5th placed position in 2016.[4] However, specifically looking at the 2018 index's "business environment" rating—which assessed the entrepreneurial environment, business infrastructure, and labour market flexibility—the UK ranked in 4th position, behind the US (1st), New Zealand and Canada.[5]

Despite these rankings, there has been ongoing debate about the strength of the UK economy, particularly regarding:

- the geographical distribution of business growth and investment, exacerbating a perceived 'north-south divide' in prosperity;
- the fact that while the UK has a historically high level of employment, there are concerns over the prevalence of low-skilled, low-wage employment in some sectors; and
- the potential costs and opportunities of the UK's withdrawal from the European Union.

The Government's primary means of addressing these concerns has been through its industrial strategy. Further information on the strategy is provided in the next section.

Government Policy

The 2017 Conservative Party general election manifesto stated that, if in Government, the party would implement an industrial strategy that would:

> Help young people to develop the skills they need to do the high-paid, high-skilled jobs of the future. And it will back Britain for the long term: creating the conditions where successful businesses can emerge and grow, and helping them to invest in the future of our nation.[6]

The manifesto committed to keep taxes on business—particularly corporation tax—low "because it will help to bring huge investment and many thousands of jobs to the UK".[7] It also committed to simplify the tax system and to undertake a review of business rates. The manifesto said business rates presented "considerable challenges to some smaller companies".

Industrial Strategy

The Government's industrial strategy was published in November 2017. The strategy set out how the Government would:

> Help businesses create better, higher-paying jobs in every part of the United Kingdom with investment in the skills, industries and infrastructure of the future.[8]

The strategy committed to:

- raise total research and development (R&D) investment to 2.4 percent of GDP by 2027;
- increase the national productivity investment fund to £31 billion, supporting investments in transport, housing and digital infrastructure;
- increase the rate of R&D tax credit to 12 percent; and
- launch and roll out sector deals—partnerships between government and industry aiming to increase sector productivity.[9]

The majority of the funding commitments in the strategy were channelled through the national productivity investment fund (NPIF), which had been established in 2016. The strategy committed to increase the NPIF to £31 billion by 2022/23.[10] The 2018 budget further committed to increase the NPIF to £37 billion by 2023/24.[11] In answer to a written question in January 2019, Elizabeth Truss, Chief Secretary to the Treasury, stated that £24 billion of this funding had been allocated, in the following areas:

- £740 million for digital infrastructure, to mobilise the market to develop full-fibre broadband networks and 5G capacity;
- £7 billion extra for R&D by 2021–22—the largest increase for 40 years—including £750 million for skills and talent (PhDs and fellowships), demonstrating progress towards the Government's ambition of increasing the R&D intensity of the economy to 2.4% of GDP by 2027;
- £6.5 billion for transport, including a £2.5 billion transforming cities fund, designed to drive productivity by improving intra-city transport and reducing congestion; and
- £13 billion for housing, to build more homes in high demand locations so that people can live near the best job opportunities for them.[12]

In June 2019, the Government announced that sector deals had been agreed in ten sectors. These included: aerospace; artificial intelligence; creative industries; life sciences; and offshore wind.[13]

Business and Employment Statistics

In 2018, data from the Department for Business, Energy and Industrial Strategy showed that there were 5.7 million private sector businesses in the UK.[14] Small businesses (employing 0–49 people) accounted for 99.3% of those businesses. They employed 43% of the private sector workforce and contributed 36% of total turnover. Medium-sized businesses (50–249 employees) comprised 0.6% of businesses, employed 13% of the workforce and contributed 15% of turnover. Large companies (250+ employees) comprised only 0.1% of businesses. However, they made a comparatively large contribution to the economy, employing 40% of the private sector workforce and contributing 48% of turnover.[15]

The data showed a consistent pattern of growth in the number of businesses in the UK since 2000, when there were 3.5 million businesses.[16] However, 87% of the business growth since 2000 was due to an increase in non-employing businesses (ie businesses that employ nobody other than their owner(s))[17]. In 2018, 75% of businesses were non-employing businesses.

Between February and April 2019, the UK employment rate was 76.1%, the joint-highest rate on record.[18] The unemployment rate during the same period was 3.8%, the lowest rate since December 1974.

Proposals for Reform of Business Taxation

In theory, many aspects of the tax system have a potential impact on the environment for business growth, investment and job creation. For example, individual investors may pay stamp duty when buying shares. Or they may pay income tax and/or capital gains tax when receiving a dividend or other benefit from a company. Likewise, the overall income tax and national insurance system may affect the incentives for citizens to take up employment. There is debate about the incidence of tax (ie the potential difference between who is legally responsible for paying a tax and who ultimately bears the cost).[19] For example, employees are legally responsible for paying income tax. In practice the administrative costs of payment are in many cases borne by their employer through the pay-as-you-earn (PAYE) system. Similarly, it has been argued that although businesses are legally responsible for paying corporation tax, the cost may ultimately be borne by employees via lower wages.[20]

Despite these complexities, the following section of this briefing focuses exclusively on the most substantial taxes in which the legal responsibility falls on the business itself, namely: corporation tax; employers' national insurance; and non-domestic rates (more commonly known as business rates). The following sections summarise government tax policy and proposals for tax reform. The proposals for tax reform focus on assessing the recommendations made by three reviews of the UK tax system. These are: the Institute for Fiscal Studies' *Tax by Design* (2011), a review undertaken by the economist James Mirrlees (henceforth the Mirrlees review); the report of the free-market think tank, the Institute for Economic Affairs (IEA), *Taxation, Government Spending and Economic Growth* (2016); and the outcome of the centre-left think tank, the IPPR's Commission on Economic Justice: *Fair Dues: Rebalancing Business Taxation in the UK* (2018).

Corporation Tax

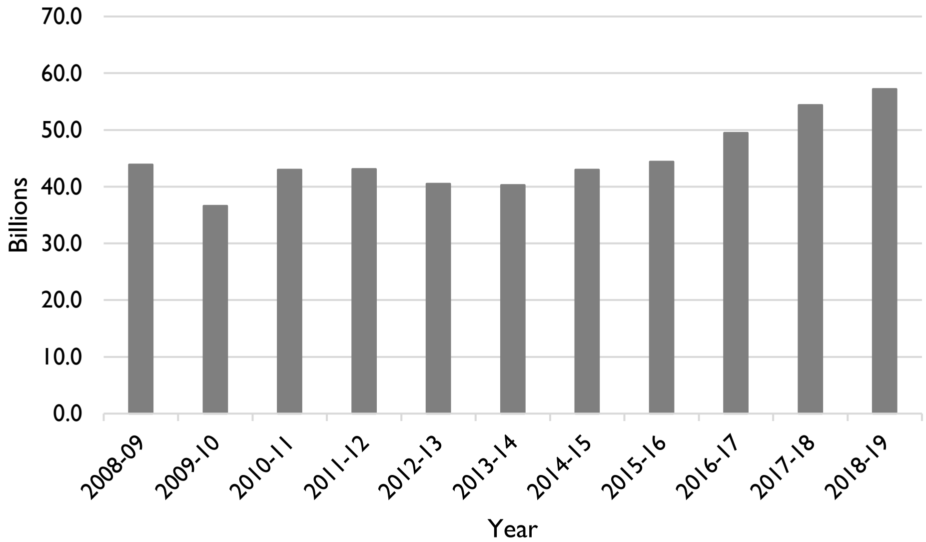
Corporation tax is a tax on a company's profits, less any deductions, reliefs or allowances. The UK's current main rate of corporation tax is 19 percent, one of the lowest rates in the OECD.[21] The Government allows a range of corporation tax deductions and reliefs. For example: for the purchase of capital assets, such as equipment and machinery; for research and development expenditure; and for profits arising from patented inventions.[22]

Since the 2008 financial crisis, the UK has followed a trend seen across several OECD countries by reducing its main corporation tax rate.[23] In 2008, the UK's corporation tax rate was reduced from 30% to 28%. The Coalition Government implemented a series of further corporation tax reductions, a policy continued by successive governments. Prior to 2015, a lower 'small profits rate' of corporation tax was available to companies with small profits under a certain threshold. The lower rate was abolished when it unified with the reduction of the main rate to 20% in 2015.[24] From 1 April 2020, the corporation tax rate is due to reduce to 17%. During the debate on the Queen's Speech in June 2017, the Prime Minister, Theresa May, stated that the Government would "encourage businesses to grow and create jobs" by continuing with the pre-announced reduction of corporation tax to 17%. This, she argued, was "because that is how to raise more money, not less".[25]

Corporation Tax Revenues

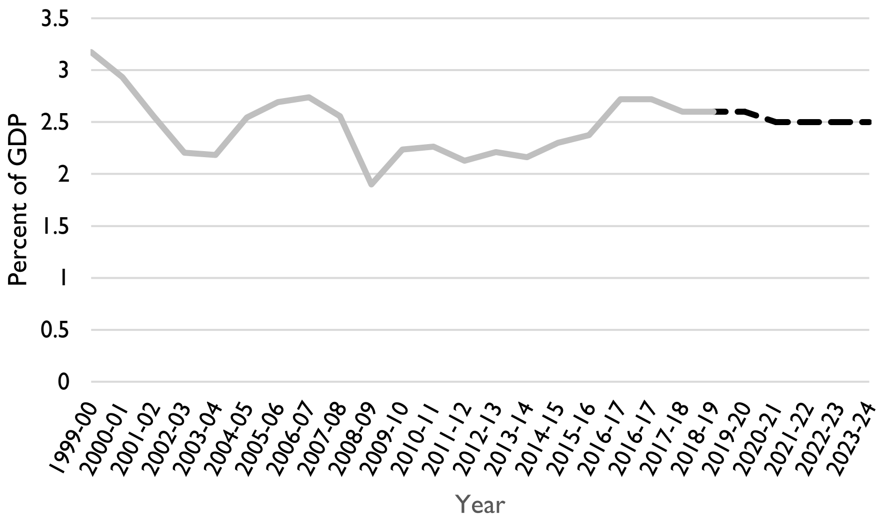
In 2018/19, total corporation tax receipts were £57.2 billion, the highest level ever.[26] Figure 1 shows the level of corporation tax receipts since 2008/09:

Figure 1: Corporation Tax Receipts, 2008/09 to 2018/19 (£ Billions)[27]



Although Figure 1 shows that the value of corporation tax receipts is now at its highest level, this is not the case if receipts are represented as a percentage of GDP. Figure 2 presents data from the Office for Budget Responsibility (OBR), showing corporation tax receipts as a percentage of GDP since 1999, including the OBR's forecasts for 2018/19–2023/24 (the dashed black line). The data shows that, despite the cuts to the corporation tax rate, receipts as a percentage of GDP have reduced since 2016. Receipts are forecast to remain static into the early 2020s at 2.5 percent of GDP.

Figure 2: Corporation Tax Receipts as a Percentage of GDP, 1999/00 to 2023/24 (Outturn (Grey Line) and Forecast (Dashed Black Line))[28]



Corporation tax receipts are not only determined by the tax rate, but also by the tax base (the amount of profits liable for taxation). Many variables affect the tax base. These variables include: the number of businesses in the economy; the profitability of those businesses; the level of investment undertaken (ie the deductions and/or tax reliefs that may be applied to the profits); and the opportunities for tax avoidance by channelling profits into jurisdictions with lower tax rates (known as base erosion and profit shifting).

In 2017, the Institute for Fiscal Studies stated that the trend of increased corporation tax receipts since the rate reductions were implemented may be explained by the following factors:[29]

- growth in underlying profits as the UK economy recovered from the post-2008 recession, particularly the return to profitability of companies in the finance sector;
- policy changes which have broadened the tax base, such as the implementation of anti-avoidance measures and tighter restrictions on profits that could be offset by carried forward losses;
- growth in incorporation in which individuals work for their own companies rather than as employees—this may increase corporation tax receipts in the short term but reduce revenues overall (as corporation tax is lower than employee income taxes); and
- weak investment following the EU referendum may have reduced the investment-related deductions and reliefs applicable to profits, increasing the tax base in the short term.

There is debate as to whether the corporation tax rate cuts have resulted in increased business investment in the UK. Table 1 shows Eurostat business investment data for a selection of EU countries for 2016–2018. The data shows the ratio of investment in fixed assets (buildings, machinery, etc) to the value added during the production process, expressed as a percentage.

Table 1: Investment Rate of Non-Financial Corporations (Gross Fixed Capital Formation Divided By Gross Value Added (Percent)), 2016–18[30]

Region/Country	2016	2017	2018
EU28 Average	23.01	23.09	23.04
France	23.48	23.29	23.76
Germany	19.75	19.84	20.03
Ireland	45.78	37.55	21.89
United Kingdom	18.1	18.01	17.5

The table shows that across this period the UK had a lower rate of investment than France, Germany, the Republic of Ireland, and the EU28 average. Ireland also had a lower corporation tax rate than the UK during this time (12.5%). Ireland demonstrated higher business investment than the other regions but showed the most significant decline in investment over the period.

Jeremy Hunt has said that if elected as Conservative Party leader he would implement a further reduction of the corporation tax rate to 12.5%.[31] If realised, this would be the second-lowest rate in the OECD, in line with that of Ireland.[32] In response to Mr Hunt's proposal, the Institute for Fiscal

Studies stated:

> Cutting the main rate of corporation tax to 12.5 percent would cost around £13 billion per year in the short run, though probably somewhat less in the long run. This is not a tax cut that would pay for itself as some have claimed—our existing tax base is too big for it to be plausible that this loss of revenue could be made up a result of higher profits being reported in the UK.[33]

The tax plans announced by the other candidate in the leadership election, Boris Johnson, committed to increase the thresholds for higher rate income tax and employee national insurance contributions. They did not include a commitment on corporation tax rates.[34]

Commentary on Corporation Tax

The policy of reducing corporation tax rate has been criticised by the Opposition. In the debate on the 2018 budget in the House of Commons, the Labour leader, Jeremy Corbyn, stated:

> The chancellor could have used today's budget to cancel the further cut in corporation tax from 19% to 17%—which will cost £6 billion and overwhelmingly helps bigger businesses—and instead use the money to support smaller businesses and our struggling high streets […][35]

The Labour Party's 2017 general election manifesto did not provide a specific rate of desired corporation tax. However, it stated that large corporations would "pay a little more while still keeping corporation tax among the lowest of the major developed economies".[36] The expected extra revenue would finance education and skills budgets. The manifesto also committed to reintroduce the lower small profits corporation tax rate.[37]

The IEA has argued that the current system of corporation tax should be abolished.[38] The rationale given for its argument is that the costs of corporation taxes are ultimately borne by shareholders and workers. The IEA proposed replacing corporation tax with a flat income tax of 15% above a personal allowance of "around £10,000".[39] Distributed corporate profits would be taxed as income at the same rate.

The Mirrlees review argued that there were reasons to continue taxing corporate profits. The report gave two main reasons: administrative convenience and as a "backstop" to prevent abuse of the personal income tax.[40] First, Mirrlees argued that it would not be straightforward to distribute all company profits to beneficial individuals, due to the large number of dispersed shareholders of modern companies. Similarly, shareholders of UK companies could be domiciled outside the UK or could be institutional investors, such as insurance companies or pension funds. Second, Mirrlees argued that the absence of a corporation tax could provide an opportunity for tax avoidance. For example, if owner-managers of small firms were incentivised to disguise their labour income as company profits.

However, Mirrlees did recommend reforms to the corporation tax regime. He argued that a drawback of the current system is that it incentivises companies to raise funds for investment through debt finance (ie borrowing) rather than equity finance (ie selling shares in the company). This is because when a company takes on debt the interest appears as a charge on the company accounts, therefore making it deductible when calculating the tax liability.[41] This is not the case for equity finance, therefore eliminating a tax efficient means by which the company could raise finance for investment.

Mirrlees recommended the correction of this anomaly by equalising the tax treatment of debt and equity finance. This would be through the introduction of an explicit tax relief "allowance for corporate equity".[42]

The IPPR has argued that the corporation tax rate cuts should be reversed, with the rate increased to 24%.[43] It argued that the extra revenue could be used to reduce the tax burden on a company's payroll. For example, by reducing employers' national insurance rates. It suggested the effect of this reform would be to stimulate job creation. These proposals are discussed further in the next section.

Employers' National Insurance Contributions

Although not strictly a tax, employers' national insurance contributions (ENICs) impose a business cost on the creation of new jobs. All employers pay ENICs on their payroll, above a lower earnings limit. In 2011 the main rate of ENICs was increased from 12.8% to the current rate of 13.8%.[44] In 2017/18, ENICs receipts totalled £72.2 billion and are forecast by the OBR to total £75.4 billion in 2018/19.[45] The OBR has forecast a sustained increase in receipts of ENICs between 2018/19 and 2023/24, reaching £96.2 billion by the end of that period.[46]

An IPPR report has argued that the impact of the trend in which corporation tax has been reduced while ENICs have increased has "benefited profitable but low-employment businesses and increased the [tax] share paid by less profitable businesses with more workers".[47] The report claimed that "given the evidence on the incidence of different types of tax", the effect had been to shift the tax burden "from shareholders to employees".[48]

The IEA has advocated the abolition of ENICs and employee NICs, to be replaced by a combination of its proposed income and distributed profits tax and public spending reductions.[49]

The Mirrlees review concluded that there is "strong case for phasing out the employer [NI] contribution altogether, merging it with income tax and employee NICs to form a single tax levied on the individual".[50] However, the review conceded that implementing such a policy would be "painful" in the short term, as it would decrease an employee's take-home pay and increase employers' profits.[51] Mirrlees suggested that either the abolition of ENICs could be phased in gradually, to ameliorate the potential objections, or some form of separate employer national insurance tax could be introduced. Mirrlees stated:

> If employer NICs were kept as a separate tax, it could apply only to employment income; so to achieve equal treatment, additional tax equivalent to employer NICs would have to be levied on capital income, self-employment income, and so on. This would add further complexity to the system […] For the fiscal purist, a system with no separate employer payroll tax has strong attractions.[52]

Business Rates

Business rates are a property tax on non-domestic properties, calculated based on the property's rateable value. This is a periodic valuation of a property's rental value on the open market multiplied by a 'multiplier' set by the Government.[53] Business rates are paid to local billing authorities, which in most cases are local authorities. Several rate reliefs are available. For example, small businesses are exempt if their property's rateable value is less than £15,000. Similarly, some types of property and land use are exempt, such as agricultural land in many cases. Businesses starting or relocating in a local enterprise zone may be exempt.[54] Data from the OBR showed that in 2017/18 business rates receipts totalled £30.3 billion. They are forecast to increase year-on-year until 2023/24 (£34.9 billion).[55]

In recent years, there have been calls for reform of the business rates system. These have come in response to concerns over the business costs associated with increased rental values for business properties. In response, the Government has implemented the following reforms:[56]

- inflation uprating of business rates has been changed from the use of the retail prices index (RPI) to the lower consumer prices index (CPI);
- more frequent property valuations, with transitional relief so that changes to bills are phased in gradually; and
- doubling the threshold for small business rate relief, which the Government claims will mean 655,000 small businesses pay no business rates.

The Government has stated that following the last "fundamental review" of business rates in 2016, it shared the view of respondents to the consultation that business rates are "easy to collect, difficult to avoid, relatively stable compared to other taxes, and that they have a clear link with local authority spending".[57] The Government stated that its reforms would "reduce rates by more than £13 billion over the next five years".[58]

The Mirrlees review argued that business rates should be abolished on business property and agricultural land. The report argued:

> The business rate is not a good tax. It discriminates between different sorts of businesses—agriculture is exempt, for example. More fundamentally, from an economic perspective, business property is an input to the productive process […] It is an important principle of the economics of taxation that an efficient tax system should not distort choices firms make about inputs into the production process, and hence that intermediate goods—those used in the production process—should not be taxed. The principal effect of business rates is that economic activity in the UK is artificially skewed away from property-intensive production.[59]

The review argued that business rates should be replaced by a land value tax (LVT) on commercial and agricultural land. This, it said, would be a less distortionary means of raising revenue:

> It is hard to be precise about what rate of LVT on commercial land would be required to replace business rates on a revenue neutral basis. Some basic calculations suggest that a rate somewhere in the region of 4% of land value levied once a year might achieve this. One could clearly introduce this gradually whilst reducing business rates, perhaps starting at 0.5% of land value and rising. Ideally, such a tax would also replace stamp duty land tax on business properties […][60]

For the same reasons, the IEA has advocated a similar policy of abolishing business rates and replacing them with a "location land value tax".[61]

Further Reading

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- House of Commons Library, *Local Enterprise Partnerships*, 29 March 2019
- House of Commons Business, Energy and Industrial Strategy Committee, *Small Businesses and Productivity*, 5 December 2018, HC 807 of session 2017–19; and Government Response, 7 March 2019
- Federation of Small Businesses, *Going for Growth: Helping Small Firms Flourish Through Access to Finance*, November 2018
- Confederation of British Industry, *Unlocking Regional Growth: Understanding the Drivers of Productivity Across the UK's Regions and Nations*, March 2017

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2 World Bank, *Doing Business 2019*, 2019, p iv.

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4 Legatum Institute, *The Legatum Prosperity Index*, 2018, p 8; and 'The Legatum Prosperity Index 2018', accessed 2 July 2019.

5 Legatum Institute, *The Legatum Prosperity Index*, 2018, p 8.

6 Conservative Party, *Conservative Party Manifesto 2017*, 18 May 2017, p 18.

7 ibid, p 14.

8 HM Government, *Industrial Strategy: Building a Britain Fit for the Future*, 27 November 2017, Cm 9528, p 12.

9 ibid, p 11.

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11 HM Treasury, *Budget 2018*, October 2018, HC 1629 of session 2017–19, p 54.

12 House of Commons. 'Written Question: National Productivity Investment Fund', 24 January 2019, 209850.

13 Department for Business, Energy and Industrial Strategy, 'Introduction to Sector Deals', 28 June 2019.

14 Department for Business, Energy and Industrial Strategy, *Business Population Estimates for the UK and Regions 2018*, 11 October 2018, p 1.

15 The employment and turnover data do not total 100% due to a combination of rounding and the methodology for calculating the number of job roles in a firm. For further information see: Department for Business, Energy and Industrial Strategy, *Business Population Estimates for the UK and Regions 2018: Methodology and Quality Note*, 11 October 2018.

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17 ibid, p 2.

18 Office for National Statistics, 'Labour Market Overview, UK: June 2019', 11 June 2019.

19 James Mirrlees et al, *Tax by Design*, Institute for Fiscal Studies, September 2011, p 27.

20 Diego Zuluaga, *Why Corporation Tax Should Be Scrapped: Bringing Capital Taxation into the 21st Century*, Institute for Economic Affairs, September 2016, p 7.

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22 UK Government website, 'Corporation Tax: Rates and Reliefs', accessed 28 June 2019.

23 Organisation for Economic Co-operation and Development, 'Corporate Tax Remains a Key Revenue Source, Despite Falling Rates Worldwide', 15 January 2019.

24 HM Revenue and Customs, *Corporation Tax Statistics 2018*, 13 September 2018, p 6.

25 *HC Hansard*, 21 June 2017, col 61.

26 HM Revenue and Customs, 'Tax and NIC Receipts: Statistics Table (May 2019)', 21 June 2019.

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[28] Office for Budget Responsibility, '[Onshore Corporation Tax]', accessed 2 July 2019; and *Economic and Fiscal Outlook*, March 2019, CP 50, p 73.
[29] Institute for Fiscal Studies, 'What's Been Happening to Corporation Tax?', 10 May 2017.
[30] Eurostat, 'Investment Rate of Non-Financial Corporations', accessed 2 July 2019.
[31] Conservative Home, 'United We Will Win. United We Will Prosper: Hunt's Brexit Plan—Full Text', 1 July 2019.
[32] Institute for Fiscal Studies, 'Jeremy Hunt's Tax and Spending Policies: What Would They Cost and Who Would Benefit?', 27 June 2019.
[33] ibid.
[34] Institute for Fiscal Studies, 'Boris Johnson's Tax Policies: What Would They Cost and Who Would Benefit?', 25 June 2019.
[35] HC *Hansard*, 29 October 2018, col 695.
[36] Labour Party, *Labour Party Manifesto 2017*, 17 May 2017, p 9.
[37] ibid.
[38] Institute for Economic Affairs, *Taxation, Government Spending and Economic Growth*, 2 November 2016, p xx.
[39] ibid.
[40] James Mirrlees et al, *Tax by Design*, Institute for Fiscal Studies, September 2011, p 409.
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[44] ibid, p 7.
[45] Office for Budget Responsibility, 'Economic and Fiscal Outlook—March 2019: Supplementary Fiscal Tables', 13 March 2019.
[46] ibid.
[47] Institute for Public Policy Research, *Fair Dues: Rebalancing Business Taxation in the UK*, 2018, p2.
[48] ibid.
[49] Institute for Economic Affairs, *Taxation, Government Spending and Economic Growth*, 2 November 2016, p xx.
[50] James Mirrlees et al, *Tax by Design*, Institute for Fiscal Studies, September 2011, p 131.
[51] ibid.
[52] ibid, p 132.
[53] House of Commons Library, *Business Rates*, 19 December 2018, p 5. Note: Responsibility for setting the business rates multiplier is a devolved matter outside England.
[54] UK Government website, 'Business Rates Relief', accessed 1 July 2019.
[55] Office for Budget Responsibility, *Economic and Fiscal Outlook*, March 2019, CP 50, p 76.
[56] House of Commons, 'Written Question: Non-domestic Rates', 4 June 2019, 257140.
[57] ibid.
[58] ibid.
[59] James Mirrlees et al, *Tax by Design*, Institute for Fiscal Studies, September 2011, p 376.
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[61] Institute for Economic Affairs, *Taxation, Government Spending and Economic Growth*, 2 November 2016, p xx.