



## OPEN EVIDENCE BASE TO UNDERPIN THE INDUSTRY RESPONSE TO THE 'TECHNICAL CONSULTATION ON THE DRAFT NON-DOMESTIC RATING (AMENDMENT OF DEFINITION OF DOMESTIC PROPERTY) (WALES) ORDER 2022

### Wales Tourism Alliance, UKHospitality Cymru & PASC UK

8<sup>th</sup> April 2022

**UKHospitality** represents over 740 companies operating around 100,000 venues across the breadth of hospitality within England, Scotland, and Wales. In Wales, our members are responsible for the employment of around 140,000 people directly and a further 40,000 supply chain employees indirectly. UKHospitality Cymru represents the whole industry with one voice- from small independents to large multi-national sites, embracing the self-catering, serviced accommodation, F&B, events, attraction and leisure sectors and the supply chain. Many of our independent pubs and restaurant Members have letting rooms

**PASC UK** is the largest sector association representing the professional self-catering sector in England and Wales. It has over 1300 Members including over 60 agencies and represents over 50,000 letting properties. Our focus is on a level playing field across the whole sector for both taxation and health and safety compliance and to help our sector become more sustainable and more profitable.

**Wales Tourism Alliance:** The tourism industry membership of the WTA reflects the whole of Wales; national, regional and local representative bodies and businesses. Through its member organisations and forums resting within its general membership, this amounts to around 7,000 working operators and means WTA contacts and representatives are found in every part of Wales.

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## 1) Introduction

The announcement, on the 2nd of March 2022, of the proposal to raise the occupancy criteria by 160% to 182 days came as a shock to the tourism industry in Wales. It particularly came as a blow to small self-catering businesses (furnished holiday lettings or FHLs) which are the most directly affected.

As we have heard from officials in Visit Wales, this threshold was proposed on the basis of its own occupancy data (Tourism Cross Party Group meeting, 30/03/2022), and from the results of the original consultation on local taxes for second homes and self-catering accommodation (25 August to 17 November 2021).

Nevertheless, we note that the consultation carried out by Welsh Government last year (25 August to 17 November 2021; “the Original Consultation”) secured only **nine** responses which agreed with the proposal of 182 days.

The majority of respondents to that consultation proposed an increase to the HMRC threshold of 105 days occupancy.

**As the primary, independent representatives of the industry, this is the occupancy threshold we recommend.**

The majority response to the ‘Original’ Consultation was not reflected in the proposals put forward in the current technical consultation. Despite responses which clearly challenge assumptions made on the back of officials’ occupancy data, we see that the latter has prevailed - and without explanation.

We take this opportunity to submit our own detailed evidence, supplied by over 1500 businesses across Wales, to demonstrate directly why reliance on one set of pre-covid occupancy data is an unsafe way for Welsh Government to proceed.

Our methodology and summarised findings are set out in Section 3.

Briefly, through our research, we have received survey responses from **almost a quarter of Wales’s estimated 6000 self-catering operators (across around 8000 properties)**. We have also, as requested, sought detailed case studies and received over 400 in less than four days. A good selection of these are provided in Appendix 2: Owner Case Studies.

These clearly show that the proposal to raise the thresholds will cause genuine hardship, particularly to those families whose properties are restricted to commercial use only. Subject to GDPR considerations, we are content for you to see all the submissions.

In short, the real-time submissions to our consultation do not align with the historic data collected by officials. This is unsurprising. While we all wish for a speedy recovery from the acute challenge of covid, it has a long tail.

As well as providing evidence for this consultation on technical detail, respondents have also articulated their nervousness about the fragility of current bookings and the sustainability of recovery in the face of

- The vast increase in energy costs. The average commercial tariff for electricity across these businesses was 14.5 pence per unit in April 2021, it is now in excess of 60 pence per unit with some being forced to even higher tariffs
- The crisis in Ukraine
- The cost-of-living crisis (which affects them and their potential customers)
- Renewed competition from overseas
- Continued staffing shortages and increased costs of employment
- Procurement costs; and
- VAT returning to 20%

These threats are chronic in their nature and the timing of these proposed changes could not be worse

There is, as you know, further disquiet across the wider visitor economy in Wales relating to other Welsh Government policy proposals:

- Tourism tax,
- NDBR,
- LTT,
- school year.

As each affects the consequences of the others, we ask Welsh Government to make it plain how they are managing and assessing these inter-related impacts.

**The evidence we have collated, from over 1500 responses, demonstrates the disproportionate and damaging economic impact the proposed new occupancy threshold will have on the self-catering sector, both on individual livelihoods as well as collectively on communities.**

**It also demonstrates that a change that applies across the whole of Wales will not achieve the Welsh Government's stated aim of achieving a greater pool of affordable housing in those communities where a high proportion of second homes has contributed to purchase prices beyond the reach of local people.**

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## 2) Process

### (A) LIMITED WELSH GOVERNMENT EVIDENCE BASE

We have made our observations of the original Consultation process in **Appendix 1** whereby the proposal for 182 days has been based on the least number of responses. There appears to be an over reliance on WG occupancy data in preparing the technical document.

Welsh Government officers have confirmed that they have not relied on Wales tourism accommodation occupancy surveys post 2019 because of the economic impact caused by the Pandemic. However, according to a verbal assurance from Welsh Government Officials pre-2019 occupancy figures have been utilised.

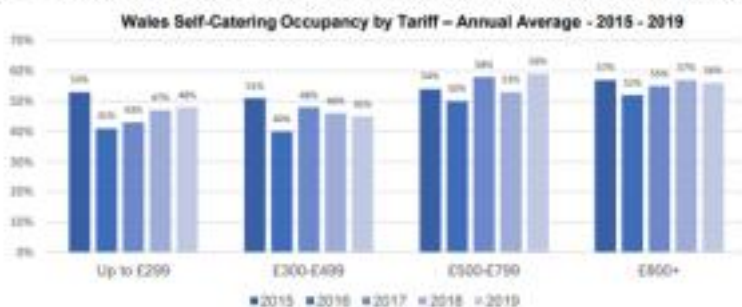
These survey reports provide trend information however we believe that the sample size is too small and potentially flawed - *The self-catering sample is usually around 300 - 500 operators* - the effect of the weighting for certain regions or size bands can therefore be exaggerated.

### Wales Self-Catering Occupancy by Tariff

This section of the report outlines annual average unit occupancy rates by tariff for the period between 2015 and 2019.

#### Wales (Overall) - Annual Average - 2015 - 2019

Properties in the tariff band £500-£799 achieved the highest annual average unit occupancy rate (59%) in 2019, – an increase of six percentage points when compared with 2018. The lowest annual average unit occupancy rate (45%) was found in those charging between £300 and £499 – 1% below the figure recorded in 2018. The only year-on-year drops between 2018 and 2019 was found in the £300-£499 and £800+ tariff bands where occupancy was a single percentage point lower in 2019 than in 2018 (46% in 2018 down to 45% in 2019 and 57% down to 56%).



Even the Occupancy data from pre-2019 from the Welsh Government's own published research of 2018 and 2019, of the average occupancy by region, shows that South East Wales has average occupancy below 50% for both years, and mid-Wales was 48% average occupancy in 2018, and 52% in 2019, across a limited sample. However, if you look at the occupancy by tariff, on the above graph, the cheaper half of the four price bands have NEVER achieved average occupancy rates over 50% in the last 4 years.

While value, quality and spend are (usually) drivers of Welsh Government tourism policy, where we have seen balance in the past is an understanding that lower-income families should not be prejudiced by that. Wales inevitably faces competition from lower-price offers from within the UK and overseas, we would like to see everyone enjoy more holidays at home. This proposal could also see the complete loss of these lower priced offerings during the peak season.

These are the individuals and families who will be hit the hardest by the cost-of-living crisis. They will be thinking about whether to take a holiday at all. Taking out the cheaper end of the FHL offer as a result of this policy reduces the offer to lower-income households. As these properties are more likely to lie outside the coastal hotspots, taking them out of the market also reduces the scope for growing tourism in the less popular inland destinations.

To be utilising this pre-covid occupancy data to make a decision which will have such a seismic impact on the Self-Catering industry in Wales is, we believe, flawed. In order to make such a large change in the legislature this decision needs the due process of a full economic impact assessment.

## **(B) VOLUME AS A DETERMINANT**

As you will have heard us say on other occasions, we too are keen to distinguish between FHL businesses and second homes/casual lets. While we responded to the Original Consultation on its own terms, there is a question in the first place about defining a business as "a business" based solely on volume of trade. We would be interested in hearing from Welsh Government of other types of business which are defined in this way, and how the decision was reached in the case of FHLs.

The setting of an artificial benchmark based on volume goes against over twenty years of Welsh Government policy and experience. Welsh Government tourism strategies have, **correctly**, concentrated on value, quality and spend - not volume - for good reasons. They have identified the following:

- Our number one strength - the countryside, natural and outdoor attractions - being at the same time our number one weakness, making Wales more weather dependent than any other home nation
- Discouraging over-tourism in high traffic "honey pot" areas.

### **Much of Wales's infrastructure and local communities cannot handle volume over value.**

In order to gain volume to meet the new threshold, FHLs will make the unwelcome decision to drop prices at a time when business costs are rising.

The reactions in the feedback that we have received and across wider social media suggests that many are already being forced to consider lowering their prices, just at a time of spiralling costs being forced upon their businesses.

We all should be driving for a greener, more sustainable tourism economy for Wales, not trying suddenly to chase volume which goes against all that has gone before, as business are forced to hit an artificially high threshold of let days to avoid punitive taxation.

**'The most popular motivations for coming to Wales were to enjoy the country's natural landscape mentioned by almost eight in ten visitors'.**

**(Wales Visitor Survey – Welsh Govt – 2019).**

Due to the lack of wet weather attractions for young families we have been concentrating on higher paying couples – ‘the over 55s and affluent young actives for the shoulder months. This has meant great investment in good value quality accommodation and other supplementary products in the shoulder months with success.

**‘Couples were more likely to visit Wales during the shoulder months than the peak season in 2019 (at 40% shoulder and 31% peak respectively), while the reverse was true for families with young children (at 29% peak and 17% shoulder). Families with young children accounted for 30% of Welsh staying visitors but only 24% of staying visitors from the rest of the UK.’**

**(Wales Visitor Survey – Welsh Govt – 2019).**

The most recent figures demonstrate this –

In order to grow volume whilst maintaining quality will mean businesses spending more to promote their business. This means offering uncompetitive prices compared to comparable properties (in competitor destinations) which are not subject to this and other Welsh Government price-inflating policies. Even without the new pressures referred to in the Introduction, lowering costs remains an inherent risk as *guaranteeing* occupancy levels is still not possible.

Margins are squeezed further in autumn and winter, as smaller number of visitors expects to pay less when running costs are higher. Occupancy is reduced to mainly Friday and Saturday bookings due to poor weather and reduced opening hours for secondary seasonal businesses and attractions.

Therefore, to make up the additional volume is not possible as there is little or no market for most Sundays to Thursday, with many operators already offering up to 40% discount (Airbnb, 2022) on these days.

**‘Almost two thirds of UK staying visitors in the shoulder months (65%) described their trip as a short break’**

**(Wales Visitor Survey – Welsh Govt – 2019).**

Indeed, the self-catering sector has invested heavily over the last ten years to build value over volume in order to increase spend precisely because our peak season is so limited and opportunities to spend are limited. Many investing in ancillary facilities to create micro destinations (e.g spa facilities).

**“ABC1 and travelling with children, C2DE are most likely to have been based in one location during their trip (at 90% and 91% respectively, compared with 84% of visitors overall”).**

**(Wales Visitor Survey – Welsh Govt – 2019).**

Rural or even isolated coastal properties are unlikely to be based near attractions and therefore not attractive to young families staying for a week, especially outside of the peak school holiday season.

It is a non sequitur that these proposals will help develop the tourism sector as a year-long sector...by ensuring more nights spent in Wales will help develop the sector and also allow new money to be spent in our communities outside the main tourist season.

We cannot agree with this. We suggest that businesses lowering pricing to try to hit artificially high targets will not invest while the spectre of the consequences of missing the 182-day threshold hangs over them.

Even on Welsh Government's own 50% pre-covid occupancy figure, it is unrealistic to suggest that the very modest budget made available to Visit Wales would help a significant number of at-risk businesses raise occupancy levels to the point of survival post April 2023.

Further, whilst there have been some great successes in recent years (such as transforming North Wales into the Adventure Capital) this new technical order will take real effect from 1<sup>st</sup> April 2023 and there is no conceivable way in which in-door attractions, from high streets to theme parks, can be developed within twelve months in order to build up the sheer number of businesses that will fall short of the 182-day threshold.

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Finally, if you look at the occupancy by tariff, the cheaper half of the Welsh Government's four price bands have **NEVER** achieved average occupancy rates over 50% in the last 4 years.

While value, quality and spend are (usually) drivers of Welsh Government tourism policy, where we have seen balance in the past is an understanding that lower-income families should not be prejudiced by that. While Wales inevitably faces competition from lower-price offers from within the UK and overseas, we would like to see everyone enjoy more holidays at home.

These are the individuals and families who will be hit the hardest by the cost-of-living crisis. They will be thinking about whether to take a holiday at all. Taking out the cheaper end of the FHL offer as a result of this policy reduces the offer to lower-income households. As these properties are more likely to lie outside the coastal hotspots, taking them out of the market also reduces the scope for growing tourism in the less popular inland destinations.

On a per person per night basis FHLs offer astonishingly good value for money.

### **(C) A SECOND HOMES ISSUE?**

We do not underestimate the need for new, efficient affordable homes and we certainly do not condone second homeowners not paying a fair contribution to local taxes.

However, in framing these proposals in terms of the second homes debate, it has not been possible to identify how Welsh Government has examined the full impact on the wider visitor economy in Wales and how much if that is reliant on a buoyant self-catering sector.

We are not aware of any Economic Impact Assessment of these proposals, either on risk-taking owners and their businesses or the cumulative effect on jobs in tourism, hospitality and local retail.

We understand that Welsh Government has to balance priorities, but we have not been able to identify any attempt to find such a balance. This is difficult to understand when the economic health of individual communities (let alone more widely) is an essential element in their sustainability and wellbeing.

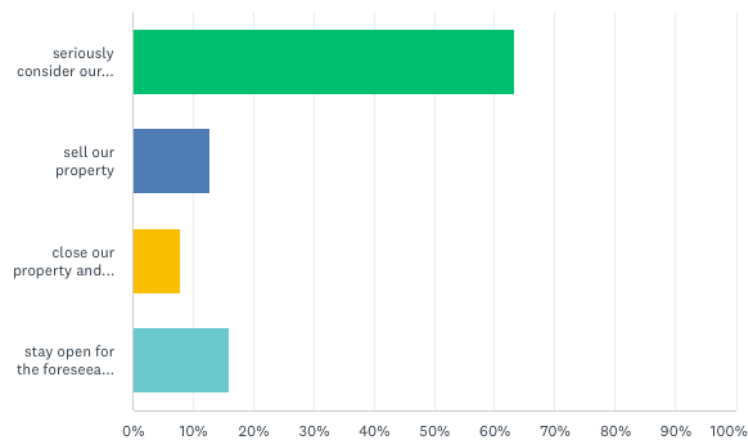
The assertion is that belief that this will only be an issue for "some" businesses." Our evidence shows that the quantum of that "some" is much greater than pre-covid figures might suggest - and that was 50%.

Our research shows a completely different picture. Only 16% currently think that they can work with the 182-day threshold.



If the current proposals from the Welsh Government come into effect, (182 days let to go onto Business Rates or pay a possible 300% premium on Council Tax) what impact will it have? We will need to: (Please answer only one)

Answered: 1,029 Skipped: 183



Where our evidence does align with Welsh Government's is the finding that the majority - though nowhere near 50% - of businesses that are able to meet the threshold are in the coastal "hotspot" communities. These are also the communities most severely affected by high property prices.

There are businesses within those hotspots that will still have difficulty meeting the thresholds.

However, the majority of FHLs that will not be able to meet the thresholds lie outside these hotspots in parts of Wales where second homes play a much smaller role in the question of local affordability (see Brooks report) and where there is potential for tourism growth without tipping the balance against community wellbeing.

They will either close or fall into the council tax regime if planning permission allows. Some may survive the change of status but will add to the corpus of properties identified as second homes rather than as businesses. Welsh Government will not want to be credited with creating more "second homes".

Others will fall into a council tax regime where local authorities have adopted higher council tax premiums for second homes. Some of these less popular areas are in the same local authority area as hotspots, but they will still have to pay the elevated premiums.

Businesses which close will not necessarily release affordable residential property onto the market. Those units on an owner's own property or with commercial-only planning permission will close or fall into the council tax regime.

Policy consultation clearly outlined the policy objectives, none of which have any bearing on properties that are legally unable to be used as permanent accommodation, such as properties restricted by planning conditions to holiday only use. Whilst planning is a different area to taxation, Welsh Government have a duty to consider the presence and impacts of the market and wider legislation. Welsh Government have shown no evidence linking such properties to the stated policy objectives. There is therefore no reasonable justification for including such properties within the scope of this legislation.

The research reports commissioned by Welsh Government omitted to even mention how such properties already positively assist in deflecting visitor demand away from normal domestic housing (conversions to holiday-lets) and thereby act towards the stated policy objectives currently.

There are also other restrictions for example: the catchment of the River Teifi in Wales is currently under a SSSI with Natural Resource Wales. All developments that pose an increase in phosphates into the watercourse are not being approved. The Local Authority is not allowing uplift of commercial premises onto residential within the catchments. Has the WG consulted the NRW over the proposed increase of phosphates as a result of these new policies?

<https://www.ceredigion.gov.uk/resident/planning-building-control-and-sustainable-drainage-body-sab/phosphates-on-the-teifi-river-sac/?fbclid=IwAR2N24FxgdNtoUc68B17wKzxEgooN-BkLV1Y8jsMWzKwXQEnMwdghriPI7E>

Therefore, if you are in this area, you would not be able to change from holiday lets permissions to residential because of the uplift in occupancy. It specifically says holiday accommodation. Basically because of the fragility of the local environment.

Owners who do decide to sell will not be looking to sell at an undervalue, especially if they have invested in the standard of the property. They will advertise their properties in parts of the country where incomes are higher and sell to people from outside the area for whom the higher price and higher tax costs are not a deterrent.

It will shut out new entrants to the self-catering industry in those parts of Wales where there is under-tourism and no threat to community identity or cohesion (see the Brooks report).

The proposal will discourage the bringing back into use of empty properties, especially those where mortgage valuations are low compared to asking price, and where renovation/maintenance costs are too high in comparison to the size and value of the property. We suggest that the NDR threshold and council tax proposals will both stifle investment in older properties, undermining the purpose for which these changes have been proposed.

All this applies to second homeowners but, more crucially, it applies to FHLs which lose their business status because of these proposals.

While some of these properties will have been bought by non-locals to run as businesses, some will be owned by local people through inheritance or investment. These proposals could mean local families having to give up their erstwhile businesses in favour of providing a new second home to wealthy outsiders.

**This is not the effect on affordability, community sustainability and security of the Welsh language that Welsh Government is seeking.**

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### 3) Our Evidence

Over the years we have gathered a great deal of data into the self-catering sector in Wales. It is a richly diverse sector, offering a wide variety of product, from castles to glamping, from luxury beach retreats to bunkhouses in the mountains, from farm stays to city living and everything in between. All are intrinsically different and operate their own business models. There is no one size fits all.

Demand varies across all parts of Wales; some hotspots are incredibly busy whereas some inland areas are quiet and peaceful.

What the evidence and feedback has shown us is that a simple over-arching high threshold simply cannot be met by many 100% legitimate businesses (FHLs).

Many of these businesses have invested substantially in their offer, and by doing so in Welsh tourism as a whole. These very businesses are now under serious threat from the proposed 182-day threshold.

In addition, the sector, having mainly survived the incredibly bruising effects of the pandemic, where any reserves were used up to simply survive, with huge impacts on mental health in the sector are now entering another perfect storm. The market is going 'soft' as the impact of the devastating war in Ukraine and the



massive increases in energy and insurance prices has brought continued uncertainty to the sector and bookings begin to slow right down.

This is not a time to try and drive these businesses to massively higher occupancy. This will only be done in the short term by reduced pricing and offers. Surely not the image that we all want for a vibrant Welsh Visitor Economy? We should be continuing with the long-standing Government tourism policy of **Value not Volume**.

Trying to drive up visitor nights in one sector alone is not a strategy and is most likely to impact adversely in the areas that need it least; the hotspots where we are already suffering from 'over-tourism' as they are top of the visitors list. Extending the season has always been the nirvana of all tourism strategies: Few have really made any real impact on substantially increasing seasons outside the holiday and good weather boundaries.

**Unreasonable Notice Period:** Welsh Government have stated in correspondence to self-catering property owners that **"..self-catering properties should aim to meet the new criteria during the year beginning on 1 April 2022, so that they can meet the evidence requirements from 1 April 2023"**

The scale of that change requires owners to re-plan their businesses, adapting marketing, operational, investment and financial practices in order to achieve the new criteria. All already have bookings for this year based on their current business and availability strategy. These changes could bring a high risk of financial failure to these businesses and force owners to move away from their current target market, changing their propositions, primarily pricing to achieve substantially higher bookings. Given this season has already started and they already have bookings based their original business strategy, and given the business changes would need time to effect, it is unreasonable to place this burden, impacting this season's business when the legislation has not yet been passed.

Whilst we acknowledge Visit Wales's quality promotion work on this issue at the moment, and we wish it success, unless Welsh Government is prepared to guarantee this with financial pay-outs in the event of market failure due to the introduction of this threshold, it is an unproven claim that hard work by Visit Wales with the industry will create the necessary demand to avoid the need for compensation. There has not even been a pilot study.

Below we set out illustrative highlights and lowlights from our research into the sector, whilst giving you GDPR-compatible access to the full reports.

## Case Studies into the Impact of the proposed 182-Day threshold.

At a Cross Party Meeting on the 30<sup>th</sup> March 2022, we were asked if we could provide some 10-20 case studies into the impact that the proposed threshold would have on businesses.

We put out a call on Friday 1<sup>st</sup> April with a four-day deadline, so that we could have them in time for this report and collate them for the Appendix. We received well over 400 responses and have been able to include over 200 in the time allowed.

***The Case Studies can be found in Appendix 2.***

There are some really heart-rending studies. The overall impact of the proposed threshold is to create fear, uncertainty, and doubt, adding to mental health pressures already exacerbated by the experience of the pandemic and the new pressures referred to in the Introduction.

Please analyse these studies and you will see the unintended consequences of the proposed threshold. Businesses that the Welsh Government have funded to diversify from farming will be ruined, owners will lose their homes, businesses, and income as a result of this proposal.

You will see that the case studies confirm who is actually captured by these proposals. They are not the higher-income second homeowners whose contribution to the community and economy is minimal. These are small micro-businesses, no burden on the state, working hard to earn a legitimate living from hospitality. Many have no option but to do short-term letting as they are limited by planning consents.

If this measure is carried through as proposed, any property, outside a hotspot, limited to only operate as a holiday let will become a blighted property. How will that help rural communities in particular?

Larger properties, bunkhouses, specialised charities and adventure accommodation are almost totally reliant on the weekend trade and will never be able to make the threshold. Converted redundant farm buildings and glamping will struggle too, with very few able to meet this threshold, with potentially dire consequences for them.

Even those that can make the 182-day threshold currently are frightened by the prospect of the impact of heavily increased marketing by their peers, most likely at discounted prices, driving their occupancy down to below the threshold.

None of us want to see headlines of businesses closing, people losing their livelihoods, their job and their homes, so **please read** the real impact for so many, contained in the Case Studies.

## PASC UK, WTA and UK Hospitality Cymru Survey on the 182-day threshold: Methodology & Key Findings

**The full report can be seen here: <https://bit.ly/3KqRx6z>**

With little time from the announcement of the Welsh Governments intention to increase the threshold from 70 days to 182 days on the 2<sup>nd</sup> of March and closing of the Consultation on this on the 12 April, the first thing that we did was to commission a survey to assess the impact of this proposal.

This survey ran for ten days and generated 1212 responses. This is the largest self-catering sector only survey in Wales. Only 16% of respondents believe that they will be able to carry on.

**This is lowest confidence indicator we have seen, even at the peak of the pandemic.**

The key findings from this report were that a much smaller proportion of the sector achieves the 50% occupancy, or 182-day rate proposed than published by official figures.

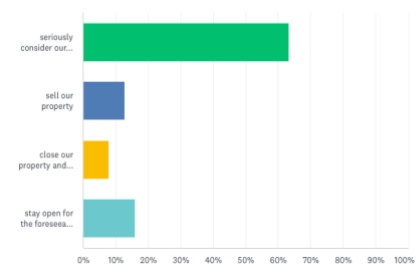
**Key data points emerging from this survey of which there were 1212 respondents:**

- 40% said properties were in high demand areas, 60% in medium or low demand areas
- 31% of owners generated over 50% of their income from short term lettings
- 85% of properties are on the Non-Domestic Rating list
- 32% have specific Planning Permissions to ONLY operate as short term lets
- 10% have a limit on how many days they can let in a given year

- 34% said that they were currently able to make the 182-day threshold
- 43% never use the properties personally
- 40% said that they closed for 3 weeks a year for maintenance
- 26% spend more than £10k annually in their economy, with a further 22% spending £7.5k
- 50% of all respondents felt that the 105-day threshold was the best solution, 13.5% want it to stay at 70 days and only 7.5% supported 182 days or more
- 63% are seriously considering their future in this sector and only 16% showing any confidence moving forwards.

If the current proposals from the Welsh Government come into effect, (182 days let to go onto Business Rates or pay a possible 300% premium on Council Tax) what impact will it have? We will need to: (Please answer only one)

Answered: 1,029 Skipped: 183



**This is an unparalleled threat level for any business sector, especially at this time, and we urge readers of this report to read the Appendix of Owner Case Studies.**

## Membership Survey by Mid Wales Tourism

Mid Wales Tourism undertook an early survey to test the water in relation to the proposal. They received 148 responses. It was decided that a further, more detailed survey needed to be undertaken to establish a more in-depth body of evidence which could be added to. The initial headline results:

- 75% were NDR Exempt / 19% NDR Not Exempt / 6% Not NDR registered.
- 80% will be able to reach the 252 days available but 80% not reach the 182 days let
- **Out of the 148 businesses who responded to the survey 80 said they would be forced to close (54%)**
- 39% of those stating they would close are NDR registered (Not Exempt)
- 70% of multi businesses said they would be able to reach the 252 days available but not the 180 days let / 50% have said that it would close their business.

**With 80% returning that they would not be able to make the threshold this initial survey was an alarming result.**

For the full survey results: <https://eu.iotform.com/report/22062488996707004>

## Impact upon Mental Health of owners.

In April 2021. Just as Covid Restrictions were beginning to ease across Hospitality, PASC UK in Conjunction with other organisations in Wales (See below) carried out a Survey on how effective Grant support had been in the pandemic. We took the opportunity towards the end of the survey to ask respondents if they had suffered any mental health issues as a result.

Please bear in mind that the purposes of accuracy, all respondents were required to give their name address and contact details so that any data provided could be cross checked.

**Over 46% of respondents have either had signs of mental health or are experiencing some form of anxiety or depression.**

This was also borne out by the telephone support calls received at the PASC UK office during the pandemic.

## PASC UK & ASSC UK-WIDE SECTORAL SURVEY INTO SELF-CATERING FEEDBACK ON FUNDING AND GRANT SUPPORT

### Introduction

- The Professional Association of Self-Caterers (PASC-UK) and the Association of Scotland's Self-Caterers (ASSC) are the leading source of knowledge on short-term letting and holiday homes in the UK and Scotland respectively.
- As a UK wide approach, the ASSC and PASC UK seek to harness empirical data about the self-catering sector across the UK in order to be able to inform the UK and devolved governments in terms of future policy decisions.
- A UK-wide sectoral survey was conducted in March 2021 relating to eligibility and access to the various packages of economic support from the UK, Scottish and Welsh Governments in response to the COVID-19 pandemic.
- The results offer valuable insights into the experiences and problems faced by the UK's self-catering operators in accessing the support required to safeguard their businesses during the Covid-19 pandemic.

### Survey Overview

- PASC UK and the ASSC gathered data about the grant schemes, due to many self-catering operators highlighting concerns about the eligibility criteria associated with the grants from the UK, Scottish and Welsh Governments in particular, as well as inability to access the Coronavirus Job Retention Scheme or Self-Employed Income Support Scheme from the UK Government.
- PASC UK and ASSC ran an online survey consisting of a series of sector specific questions. This was publicised via PASC UK and ASSC newsletters, as well as via social media channels.
- The online survey elicited 1395 responses from self-caterers in England, Scotland and Wales, from both PASC, ASSC members and non-members alike, across the UK's local authority areas.
- 59% of responses were from members of PASC UK or the ASSC. 41% of responses were from non-members.
- With special thanks to the Wales Tourism Alliance, North Wales Tourism, Visit Pembrokeshire, Tourism Alliance, SW Tourism Alliance and the FHL Business Support Group for circulating the survey throughout Wales.

## Summary

It is hoped that the survey results will inform greater discussion regarding the support provided to self-catering operators in the UK during the Covid-19 pandemic.

### Some of the key findings include:

- A good proportional split of responses were from across the UK, predominantly from **rural locations** with 47.38% being from England, 38.63% from Scotland and 15.63% from Wales.
- NOTE: the survey did not extend to operators in Northern Ireland due to limitations in sources for circulation.
- The majority of self-catering businesses have been running for at least 6 years. A large proportion of self-catering businesses have been running for 11 to 20 years or more, with some operating over 40 years.
- **Over 46% of respondents have either had signs of mental health or are experiencing some form of anxiety or depression, there is evidence of the impact of the Covid-19 crisis being felt across the sector.**
- Currently there is a mixed picture in terms of business confidence, with 38% of respondents being somewhat optimistic and 20% somewhat pessimistic and almost 27% taking a neutral view at the moment, not knowing what to expect.

The Full report is available here:

<https://www.pascuk.co.uk/reports/> Where it can be downloaded. Look for this icon.



## The Economic Impact of the Self-Catering Sector on the Welsh Economy

In August 2021 PASC UK published the most extensive report into Welsh Self-catering, utilising live booking data from numerous booking platforms plus visitor surveys.

The full report can be found on this page and downloaded:

<https://www.pascuk.co.uk/reports/>



Key highlights were as follows:

### Wales



### Gross Visitor Spend by Item (Wales)



**£87.2m**  
Accommodation fees



**£13.4m**  
Travel to and from property



**£7.7m**  
Food and drink  
(in local shops)



**£27.5m**  
Food & drink  
(bars, cafes & restaurants)



**£4.4m**  
Outdoor recreation and other sport



**£49.7m**  
Visitor attractions



**£5.5m**  
Travel during stay



**£15.1m**  
Food and drink  
(in supermarkets)



**£7.2m**  
Other shopping

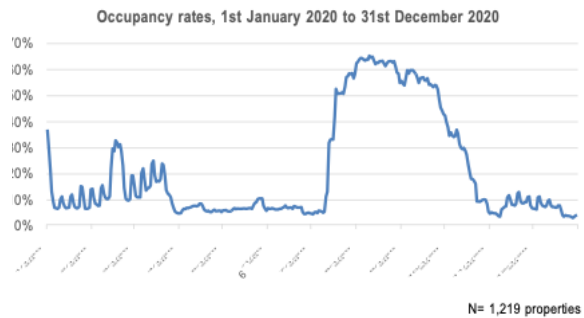
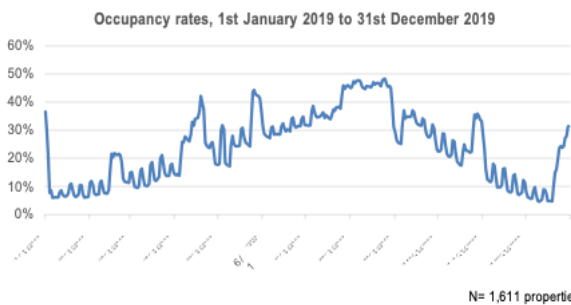


#### Areas with the greatest number of properties

1. Dyfed (3,130)
2. Gwynedd incl. Conwy (2,520)
3. Anglessey (735)
4. Powys (690)
5. Clwyd (270) & West Glamorgan (270)

In the appendix to this report, you can see the data provided by the booking platforms on actual occupancy. This is based upon paid bookings only.

#### Wales





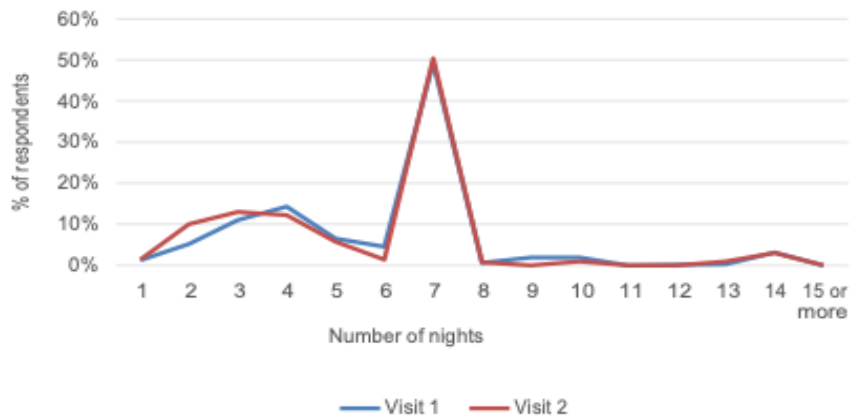
# The Short Break Staycations

The popularity of the short break is on the rise, with most operators now only able to sell seven-night stays in peak times, the summer holiday and Whitsun being the most likely. The visitor wants an experience filled two-to-three-night stay. These most commonly have to fit around weekends, making out of season midweeks really hard to fill. If you are in a hot spot area, this will be easier, but for many rural businesses filling midweek for around six months of the year is going to be nigh on impossible.

### Visitor characteristics

This section looks at findings from visitors for up to two visits to a self-catering property. Visit 1 is the most recent visit i.e., 2020 and visit 2 is pre-Covid-19 i.e. 2019. On average visitors spent 5.9 nights during visit 1 and 5.7 nights in visit 2. The distribution of responses is shown in Figure 3.3 and demonstrates a very consistent trend between visit 1 and 2.

Figure 3.3: Number of nights stayed per visit



## Actual Booking Data across 792 Properties

This spreadsheet shows the number of nights let across the various ‘sleeps’ sizes of properties in Wales. In general terms the larger the property the harder it is to achieve the same occupancy as a smaller property, simply because there are fewer large groups that want to go away together than family sized units.

This is real reason why a one size fits all threshold, at a heightened level, will particularly penalise certain types of business in non-high demand areas.

Sleeps	No of properties	Avg 2019 nights	Avg 2020 nights	Avg 2021 nights	Avg of 2019 £	Avg of 2020 £	Avg of 2021 £
(blank)							
1-5	433	155	96	158	£ 14,611	£ 9,165	£ 17,004
6-10	291	125	80	128	£ 18,205	£ 11,531	£ 20,863
11-15	37	127	78	132	£ 38,503	£ 22,373	£ 43,399
16-20	17	78	44	83	£ 46,078	£ 23,025	£ 46,948
21-25	6	79	44	63	£ 53,865	£ 25,241	£ 35,185
26-30	4	144	48	101	£ 141,148	£ 49,014	£ 119,061
31-35	2	96	21	68	£ 80,657	£ 14,744	£ 72,804
36-40	1	90	31	16	£ 90,324	£ 34,189	£ 23,380
46-50	1	28	22	39	£ 44,220	£ 23,805	£ 59,581
<b>Grand Total</b>	<b>792</b>	<b>140</b>	<b>87</b>	<b>143</b>	<b>£ 18,959</b>	<b>£ 11,336</b>	<b>£ 21,154</b>

This data has been provided by the SuperControl Booking System and shows actual bookings placed and paid for on their system. The vast majority of these are professionally let business who have opted to pay

for a booking system. As can be seen there is not one column of nights let that averages anything close to 182.

## Impact of the increased threshold on Women and Carers

We have received some compelling data on the impact of the proposed threshold increase on women, and particularly those who are also carers.

Below we have included some data from a report into this, and it's clear that there is a real issue here. Women play a huge role in this sector, and in most cases are the driving force in these businesses. Many of them have other responsibilities too.

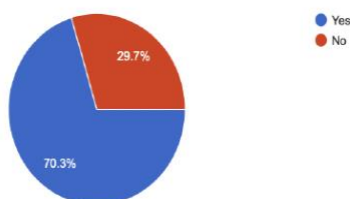
This survey clearly highlights the need for the Welsh Government to carry out a full Economic Impact Study, into the proposed measure, to include what impacts it will have on different parts of society.

Once again, this illustrates how the target of the proposed measure is the wealthy second homeowner, depriving a local from buying a house, yet will have hugely detrimental effects through unintended consequences.

The full report can be accessed here. <https://docs.google.com/forms/d/1iNNZ56ebZi-bBlsgOgRUDWnmFwDOme4v0mIEeLZeTLU/viewanalytics>

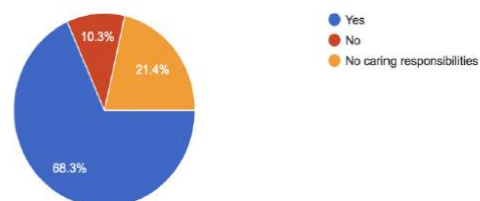
3. Do you have caring responsibilities - perhaps for school-age children, a disabled child/partner or elderly parents?

145 responses



4. Does your self-catering accommodation business have to fit around these responsibilities?

145 responses



## 5. Conclusion

Our evidence shows many micro locally run family FHL businesses will simply shut down: Some of the buildings will be sold, possibly to buyers outside of Wales because they will not be in the right location or price bracket, others converted back to farm buildings or re-absorbed into owners' own primary residences.

There is a risk that some will be abandoned in an attempt to avoid paying tax on an un-productive building.

As a tool to bring properties back into a market which is affordable to local people, it will not work. Rather it will reduce local owners' ability to earn an income and cause a decline in secondary jobs in hospitality, retail, house maintenance and cleaning etc.

It will not safeguard the Welsh language as these businesses will be lost to wealthier outsiders prepared to meet the higher costs of having a second home or self-catering businesses in Wales.

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We recommend that:

- (a) Welsh Government observes the majority response to the Original Consultation and Increase the threshold from 70 Days to 105 Days (that's a 50% increase) and align with FHL HMRC taxation rules;
- (b) We adopt the term 'Holiday Let Businesses' for FHLs that comply with 105 days letting and full HMRC tax compliance;
- (c) Properties that are limited by (i) planning permission to only be short term commercial lets and (ii) lie within the curtilage of an owner's primary residence are not made liable to pay the additional council tax premiums if they do not hit 105 days let;
- (d) Allowances can be made when whatever threshold is finally determined upon, accommodating limitations on availability (as opposed to occupancy) such as, carrying out repairs, property improvements, closure due to ill-health or caring responsibilities. We would be pleased to work with the Welsh Government in determining what these might be;
- (e) We work with Visit Wales to drive quality and nightly yield up to improve profitability and sustainability of this sector of the industry;
- (f) We work with Visit Wales, Welsh Government and other partners to push forward the green, low-zero carbon agenda in the self-catering business sector.

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## Appendix 1

The Welsh Government 'Local Taxes for second homes and self-catering accommodation' Response evidence:

The Welsh government has proposed legislation that does not reflect the consultation responses, the following analysis of the data presented in the published response document is shown below. In each case, the proposed legislation takes no account of the majority views expressed by those who took part in the consultation, and in many cases creates legislation that represents the opinion of just a tiny fraction of the respondents who took part.

### **Q. How effective are premiums in addressing housing issues?**

A. 79% said little or no effect, 9% said positive effect.

**Result: go with the 9% and push forward with the council tax premiums as a means of addressing housing issues**

### **Q. Is current max of 100% appropriate?**

A. 64% said appropriate or too high, 20% said too low.

**Result: go with the 20% and raise the maximum**

### **Q. Should self-catering accommodation thresholds be higher?**

A. 75% said either no change or no support for higher thresholds, 22% supported higher.

**Result: go with the 22% and raise the thresholds**

**Q. If thresholds changed, what should new available to let threshold be? A. 149 replies suggested greater than the current 70 days (15% of respondents), 38 suggested 210 days (4% of respondents).**

**Result: go with the 15% of all respondents who supported an increase and set the level in line with the 4% of all respondents who suggested 210 days**

**Q. If thresholds changed, what should new actually let threshold be?**

A. 118 replies suggested greater than the current 70 days (12% of respondents), 38 suggested 105 days (4% of respondents), 9 suggested 182 days (0.9% of respondents).

**Result: go with the 12% of respondents who supported an increase and set the level in line with the 0.9% of respondents who suggested 182 days**

*Of keynote are the responses to Q9 'If the self-catering thresholds were to be changed, what do you suggest the new thresholds should be'.*

*Of the 155 responses suggesting a rise on the **availability** criterion, 149 proposed thresholds higher than the current 140 days, ranging from 150 to 365 days. The most common specific suggestion was **210 days** a year. The most common specific suggestion for **commercial occupancy** was **105 days**. Only 9 responses supported a range of between 182 days or 6 months (9 responses).*

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## Appendix 2

### Owner Case Studies

**Important Note:** The deadline to submit this report has been short, but despite this the response to our request for case studies has been over whelming. This in itself speaks volumes as to the deep concern for livelihoods that are being threatened by this proposal and laid out below are Owner's Case Studies describing the impact of the proposed increase in letting threshold to 182-days. In order to help readers quickly understand the gravity of the situation we have highlighted key points (as best we have been able given the limited timeframe). We sincerely ask that you read and consider the considerable weight of evidence provided here by business owners into the impact of the proposed measures.

These Owners Case Studies have been anonymised for commercial confidentiality reasons and to comply with GDPR guidance. We can if required and with the owner's permission, provide the contact and business details for each of these.

### Wales 182 Days Impact -121 Case Studies

Results of a survey of Welsh self-catering businesses on the likely impact of the imposition of a 182-day minimum letting period. The survey was carried out by PASC UK (Professional Association of Self Caterers) between 01 and 04 April 2022. Respondents were asked to answer the following questions

1. Your name
2. Your business details
3. A short description, (e.g. two holiday cottages, rural location, been trading for 18 years etc)

4. The impact on your business of the 182 threshold will be
5. The impact on you personally
6. What your turnover was in 2019 and 2021
7. How much you would have to pay if you were on Council Tax rather than Business Rates and benefiting for SBRR (Small Business Rates Relief)
8. Question 7 repeated but at 200% Council Tax
9. Question 7 repeated but at 300% Council Tax
10. Please also put if you are limited by planning Permission to only do short term lettings and if any restrictions apply.

## Case Studies

<b>Business Details</b>	This is our only holiday cottage and is an annexe to our house in Llandrindod Wells
<b>Short Description</b>	It is in a very rural location and is not in a tourist hot-spot. It has never been part of local housing stock, does not have its own deeds and cannot be sold separately. It was converted from a granary specifically for use as a holiday cottage. It has been run as a self-catering holiday let for approximately 22 years, with ourselves personally running it for the last 5 years.
<b>Impact on the business of 182 threshold</b>	<p>In our best year with an agency we achieved around 160 days. We left the agency and advertise independently so that we can be more flexible to suit our personal circumstances. It would be difficult to attract significantly more guests to the cottage when most people visit in the warmer months. Winter in mid-Powys is unattractive when it is cold, wet, windy and muddy underfoot (most of our guests are walkers). Any local tourist attractions are closed in winter for obvious reasons.</p> <p>An increase to 182 days would force us to close the business and apply for change of use to residency. IF this were to be granted it would not help as we would then need to pay council tax and other maintenance costs on a building not earning any income. It is not close to a village or town, there is no public transport nearby and would not solve local housing needs. The cottage then becomes a liability and in the extreme we could be forced to sell our home.</p> <p>Future owners would be faced with the same dilemma: run the cottage as a FHL and hope to get enough occupancy, or pay two sets of council tax at a very high premium. Neither is an attractive option and could result in devaluing our property.</p>

<b>Personal impact</b>	<p>We are a partnership, mother and daughter. Daughter has chronic health issues, mother is 71 years old. We are able to manage the cottage if we can do so under our own terms while working around other responsibilities. For the 71 year old the cottage supplements a small pension whilst also allowing time to contribute to the upkeep of the main residence. For the daughter, it allows working from home and contributing to the family finances while working around child care etc. We clean the two bed, two bath cottage ourselves and do all the washing and ironing. This is extra to cleaning the main house. The proposed huge increase in occupancy, even assuming this could be achieved, would be impossible for us physically and would not allow us the time needed for other commitments and any respite time that we need. We do not possess the levels of energy that would be required. If we were to employ cleaners any profit that we make would be swallowed up with no guarantee of achieving 182 days occupancy while still requiring to pay a premium in council tax. If we passed extra costs on to our guests we become uncompetitive. We are already faced with very high oil heating and electricity bills. We would operate at a loss as well as losing our small income. We would rather pay council tax at a reasonable rate if this meant that we could continue to operate the cottage as we do now even though this might mean only breaking even.</p>
<b>Turnover</b>	<p>2019 - £8,354.43 2021 - £9,041.78</p>
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £2000
<b>Incremental cost of Council Tax at 200%</b>	at 200% Council Tax: £4000
<b>Incremental cost of Council Tax at 300%</b>	at 300% Council Tax: £6000
<b>Planning Permission restrictions</b>	It was converted specifically for use as a holiday let and does not have permission for residential use. For a minimum of two weeks of the year it must be unoccupied.
<b>Any Other Comments</b>	

<b>Business Details</b>	One holiday cottage which is attached to our house in Narberth.
<b>Short Description</b>	<p>In fact the Cottage and our home are effectively one house, being an old farmhouse whereby the agricultural building at the end was converted for habitable occupation some years ago under planning permission specifically granted for use only as a holiday cottage with restricted occupancy. This agricultural building was renamed at that time and was separately rated from the main house. The restriction is not to use the cottage during the months of November, January and February. We bought the whole package in 2013 specifically to give us an income in our retirement. Since our</p>



	<p>purchase we have used the cottage as a holiday short lets (weekly) business as required under the planning permission granted. This is our 9th year. We have worked hard at this business and built it up as far as possible . We ourselves are both over retirement age and this income is vital to us. All our guests use the local facilities (restaurants, shops etc) and we believe they contribute significantly to the local economy.</p> <p>Our cottage is rural about one mile outside Narberth. We are not coast based and so not very appealing to families with children. Our guests tend to be older who want a quiet week. The location of the cottage does not appeal to people during the winter months when the area is wet, cold and very muddy. As such, although the cottage is open during the winter, we rarely get any booking beyond the end of October through to April. Our cottage is widely advertised.</p>
<b>Impact on the business of 182 threshold</b>	<p>The 182 day threshold will be hard to obtain as, as stated above, it does not appeal to holiday makers in the winter months and we have restricted occupancy in any event. The loss of business rates would have a significant effect on our income and would make it unviable for us to continue. We have already taken Estate Agents advice on selling off the cottage separately but we have been advised by three separate estate agents not to do this. Therefore if we lost the business rates we would be forced to sell our house as well and probably move away from the area.</p>
<b>Personal impact</b>	
<b>Turnover</b>	<p>At present the cottage brings in an income of about £9,500 per year gross, less of course bills and other outgoings (electricity, water, waste water, maintenance, garden plants, linen, cleaning materials etc, etc). We do the administration and cleaning ourselves.</p>
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1300
<b>Incremental cost of Council Tax at 200%</b>	at 200% Council Tax: £2600
<b>Incremental cost of Council Tax at 300%</b>	at 300% Council Tax: £3900
<b>Planning Permission restrictions</b>	The cottage is not allowed to be used in the months of November, January and February
<b>Any Other Comments</b>	<p>We have composed a small table below showing how the loss of business rates would affect us together with the effect of the imposition of council tax at 100%, 200% and 300%.</p> <p>(a) With small business rates relief:  Income for 2019 £9,250, less outgoings £2860 ..... profit £6,390  Income for 2021 £10,500, less outgoings £3,000..... profit £7,500</p> <p>(b) 100% council tax</p>

	<p>Income for 2019 £9,250, less outgoings and 100% council tax - profit £5,090</p> <p>Income for 2021 £10,500, less outgoings and 100% council tax - profit £6,200</p> <p>(c) 200% council tax</p> <p>Income for 2019 £9,250 less outgoings and 200% council tax – profit £3,790</p> <p>Income for 2021 £10,500 less outgoings and 200% council tax – profit £4,900</p> <p>(d) 300% council tax</p> <p>Income for 2019 £9,250 less outgoings and 300% council tax – profit £2,490</p> <p>income for 2021 £10,500 less outgoings and 300% council tax - £3,600</p> <p>To summarise – our income net for last year would be £7,500 at present with business rates. If council tax was reimposed at 100% it would drop to £5,090, at 200% council tax £4,900 and at 300% council tax £3,600.</p>
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<b>Business Details</b>	Farm cottage in Bala, Gwynedd
<b>Short Description</b>	The Farm Cottages was opened by us in 2017, we have 5 self catering cottages sleeping a total of 16 people, in converted farm buildings on our property which is a farm and we live on site in the farmhouse. The cottages have planning restrictions limiting their use to Holiday lets with a 30 night occupancy clause. We are in a very rural location nr Bala Gwynedd.
<b>Impact on the business of 182 threshold</b>	<p>The Impact on our business of a 182 threshold for business rates would be huge, we are in a rural area, (not a honey pot area near the coast), we have never achieved this level occupancy in our 5 years of trading with the best year being an average of 152 nights per cottage, the season is short here and the winter months are a very hard sell.</p> <p>We run various holiday lets groups for north Wales on social media totalling over 30 thousand members (prospective customers) we advertise with booking.com, airbnb, trip advisor and vbros, as well as having our own website, I fail to see how we could suddenly increase our occupancy rates by nearly 20% over our very best year to meet these new requirements, if we are were forced to go onto council tax at +300% our business would become completely unviable, current business rates £4500 vs an approx council tax bill of £26000.</p> <p>The failure and closure of our business and others like us would be felt far and wide in our rural community, we employ many local trades for maintenance (electricians, plumbers, decorators, gardeners etc) we spend a small fortune locally every year on cleaning products, spare parts and produce for our welcome baskets.</p>

<b>Personal impact</b>	<p>Personally this would be nothing short of a disaster for us we would have to close our business, we have invested everything we have in our holiday cottage business, it is our only source of income, the cottages are on our property so can not be classed as second homes as they are part of our home property, the failure of our business would not return any of the cottages to housing stock due to planning restrictions, we would probably be bankrupted by this change as our property would be effectively worthless, made completely unviable as a business by government policy, it should be noted that its was on the market for 4 years empty and unused, before we took a chance and invested our future in Wales, is this really what the government want going forward, rural properties like ours left derelict and no longer bringing much needed money into the area?</p> <p>This could not come at a worse time with energy prices going through the roof our operating costs are already rocketing, cost of living is increasing massively meaning less disposable income for luxuries like holidays, those with healthy disposable incomes are now looking at being able to head abroad for the 1st time in 2 years as we come out of covid, its a perfect storm for the hospitality industry in N Wales, bookings already this year are looking very slow, we are approx 50% down on pre bookings for the season so far.</p>
<b>Turnover</b>	<p>2019 turnover £62050.00  2021 turnover £79578.00. (our best year, caused by a lack of International travel due to covid)</p>
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £6500
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £19500
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £26000
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>Council Tax vs Business Rates Impact  business rates £2250 with current 50% SBR relief if we were on council tax we would have a bill of approx £6500.00</p>

<b>Business Details</b>	home and a smallholding, Llanfrothen, Gynedd.
<b>Short Description</b>	
<b>Impact on the business of 182 threshold</b>	
<b>Personal impact</b>	
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	

Incremental cost of Council Tax at 300%	
Planning Permission restrictions	We were granted permission on the basis that it could be used and only used as a self -contained holiday let despite us exploring its use as a full time residence.
Any Other Comments	<p>I would be grateful if you could spend a few moments to read my letter. It is a plea to you to understand my situation and many like me who are falling foul of the proposed change to second home council tax and the levels of occupancy for holiday lettings required to qualify for business rates.</p> <p>As a woman of Welsh decent, we returned to Gwynedd several years ago. I had been an ambulance paramedic and my husband was in the trades. Two working class people on working class wages.</p> <p>We found and fell in love with a small, very run down, house with a couple of outbuildings. It had been on the market for over two years prior to us buying it. We got a bigger mortgage and set about making it our home and a smallholding.</p> <p>Faced with a change of career to maintain a wage and in turn support other local services and providers, we applied and were successful to gain planning permission to restore and renovate a tumbling down small outbuilding. We were granted permission on the basis that it could be used and only used as a self -contained holiday let despite us exploring its use as a full time residence. It was completed, again using all local trades and a lot of our own blood, sweat and toil, and for three years now has been a full time, 365 days of the year, business. We had no restrictions for seasonal letting.</p> <p>All things being equal, I may achieve the new proposed 282 days available and 182 days let but what if I cannot. This system allows for no anomalies. Let's say I was ill to a point I wasn't able to clean, maintain, organise my little holiday let. I don't have the choice to diversify. I cannot rent it out on a full time residency basis (even if I could, there is a huge difference between a small cosy one room stone cottage for a few days break than actually living in one). I am not allowed to rent it for other business ventures. I cannot put a family member in there. I cannot use it for my farming.</p> <p>I travel 240 miles every other week to look after my mother. A job I share with my sister. I do this because I can organise my time to run my cottage and look after mum but achieving 182 days is a huge problem. My cottage brings me in a wage. Not huge but it means I don't claim any benefits and I can spend my profit in the local community. Bakers, butchers, hairdressers, garages, cafes, corner shops, post offices, clothes shops the list is not exhaustive but if I cannot fill the new requirement and I cannot diversify I will be liable for, potentially, a 300% addition to the normal rate of</p>

council tax and that profit will be gone and so will my spending. I literally feel I am being bullied into working full time and I have no life options whatsoever. I cannot even decide to close up the business because the building will still be there and liable for +300% and I cannot sell it on. How do I do that, where do I turn? Could I remove the kitchen and bathroom and rent it as a room? Could I remove the kitchen and bathroom and make it into an annex and thus have it taxed as part of my own home? No, I cannot because the planning restrictions do not allow me to. I cannot sell it, I cannot change it, I am absolutely made to continue with it at full pelt despite trying to care for a vulnerable human being and the cost of this, is the care for my mother or sell my little home and everything we have worked hard for, leaving the community I love.

I am in my mid fifties, how do I retire if, with only a small pension, I am liable to pay loaded taxes? Quite literally, how do I retire and stay in my home. A home which is not extravagant or huge.

If I had made a bad financial decision on the stock exchange, or a business liquidate because of bad planning or anything that could have been interpreted as my fault I would have to hold my hands up and deal with the sale and loss of our home but I have abided by every law, followed every direction of every governmental department and now met with cries that planning decisions are not part of this process. The planning process plays a huge part for many of us. It is real and it is absolutely relevant. We have been actively encouraged to diversify in the past and bring tourists and wealth into the area. A policy which has changed now but was in full swing not that long ago and the ones suffering are the very people who did what they could to stay in their homes and make a living. We are not talking the salaries of wealthy city bankers here, we are a group of people who make a small wage but it is significant to us.

Whether or not I believe the second home issue here in Gwynedd directly contributes to the lack of people being able to access the housing market is irrelevant but what is relevant is the idea behind all of this is to provide homes for people to be able to stay in their local areas and it is the single biggest thing that will see myself and others like me have to move away from our homes and the communities we love and contribute to by means of a small business. It goes against everything that is trying to be achieved isn't it?

I believe the situations such as I have tried to illustrate should receive individual recognition and not fall under a blanket of policies.

I would value your feedback and comments and I would ask for your help and support for small businesses like mine in your constituency and beyond in making sure our plight is recognised

	and not ignored with safeguards put into the new policies to make sure we are protected from being forced into giving up our homes. People in my situation do not contribute to the shortages of homes, we do not hold properties that could be used for housing local people yet we are to be made to pay towards schemes to our own housing detriment.
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<b>Business Details</b>	Self catering Cottages in Pembrokeshire
<b>Short Description</b>	<p>Firstly, as a family we have lived here for over 40 years and as a bona fide full time business, this is how we earn our living! Our historic former farm site consists of 9 five star self-catering cottages and two private domestic homes (one occupied by myself and our three children and one by my parents). In our opinion, the cottages should not be classed as 'second homes' in the way one would normally assume, where the owner lives and earns their living somewhere else. The Welsh Government could surely distinguish between self-catering businesses (FHLs) and second homes/casual lets.</p> <p>As a longstanding farming family of generations who have lived in Pembrokeshire, it is only by the initial investment of my grandparents and over £2,000.000 invested in the intervening years by both ourselves and my parents, in major renovations of the redundant farm buildings that it has made it possible for myself and my family to continue with the business and bring our children up in the beautiful county we love. This is a long term lifestyle project and not simply 'a bit of extra income on the side'. We agreed wholeheartedly with the sentiments of Suzy Davies - Chair - Wales Tourism Alliance, in her letter of 3 March 2022 to Mrs Julie James M.S - Minister for Climate Change. In their draft order for distinguishing between a second home/casual let and a self-catering business (FHL), the suggested WG thresholds are raised dramatically without any explanation as to why they have landed at these figures. The number of days the property must be available rises from 140 to 252 days, an 80% increase and the number of days a property must be let rises from 70 to 182 days, a rise of over 150% Where is the reasoning for this? We have worked tirelessly to create a small complex of luxury holiday cottages which have brought hundreds of guests to Pembrokeshire, businesses like ours have provided the customers for the growing tourism business such as cafes, attractions etc here in Pembrokeshire. These proposed changes will ruin the whole industry and many locals will be left without thier businesses and in many cases their homes.</p>
<b>Impact on the business of 182 threshold</b>	The WG's suggested threshold of occupancy to 182 days would be very difficult to achieve across our portfolio. If only we could regularly guarantee that level of occupancy! Even



	on the back of coming out of lockdown during the pandemic year July - October 2020 and the following season of 2021, our number of days let did not reach the new suggested levels in some of our cottages. The reality of a 'normal' year is far short of that and 2021 cannot be seen as indicative of future demand.
<b>Personal impact</b>	Our real fear is that businesses like ourselves who pay business rates on our self-catering properties will not achieve the new occupancy thresholds and would be unviable at the new council tax rates. That leaves us with the unbearable thought of loss of our business, our livelihood and ultimately having to leave our home.
<b>Turnover</b>	Our yearly revenues are as follows however I must stress that the proposed increase in revenue cannot be based on the 2021 season as this was as we all know (a staycation year) and is likely not going to be matched in 2022.  Yearly revenue  2019 -£180,000 2020 -£167,000 2021 -£290,000
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £15,030
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £30,000
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £45,000
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Self Catering holidays in Blaenau Ffestiniog
<b>Short Description</b>	2 bedroom cottage (sleeps 4), been trading since April 2021 in Blaenau Ffestiniog
<b>Impact on the business of 182 threshold</b>	The impact on my business of the 182 threshold means we will have to significantly lower the nightly prices in order to stand a chance of getting the bookings, however this has been counterproductive because the heating bills have increased substantially, we have found on occasion we've actually spent more money to have the booked nights so have actually lost money on some nights. In addition to this the customers socio-economic background on these occasions has been different to our normal customers, they've been less interested in spending money in local experiences and business, and more interested in drinking alcohol within the house, it has caused some of the resident Blaenau neighbours problems (noisiness, not looking after the house and area).
<b>Personal impact</b>	This has had an impact on mine and my partners mental health, we took great pleasure with working with local

	<p>blaenau community looking at ways to improve the high street and funnel tourists to their businesses and make sure holiday goers had a great time experiencing what the local business have to offer, it was fun and exciting to help the holiday goers and the businesses. Now, this has caused me and my partners anxiety to go through the roof, if we don't get 182 nights, which is highly possible, given local weather and the type of accommodation we have. It's caused us severe upset and to feel pushed out of the community, are we not welcome? We would not be able to afford a potential £6000 a year we would lose money so would have to sell. I appreciate that's maybe what it wanted by the WG.</p>
<b>Turnover</b>	<p>Started in April 2021, due to have had £13,000 turnover approx, however £17,000 outgoings so £4000 loss in year 1 (had major expenses and building work to get building up and running).</p>
<b>Incremental cost of Council Tax at cost</b>	<p>At 100% council Tax: £3072</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>at 200% Council Tax: £4608</p>
<b>Incremental cost of Council Tax at 300%</b>	<p>at 300% Council Tax: £6104</p>
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	<p>Cottage Escapes in rural North Wales</p>
<b>Short Description</b>	<p>Luxury three bedroom farmhouse cottage. Located on a small holding in rural North Wales. It is a self-catering accommodation that sleeps 6-8 guests. Mainly for families and groups of friends.</p> <p>Our business emphasizes a luxury stay with excellent amenities, quality and attention to detail. We always shop local to support local businesses and buy good quality produce such as welcome hampers, flowers, chocolates and gifts – all from local businesses. We also use local cleaners and other staff for changeovers and maintenance.</p> <p>We inherited the adjoining cottage from my late parents in 2020. We were able to secure a 'holiday let' mortgage to finance a much needed refurbishment, using local builders and craftsmen as well as local furniture shops. It was finished to a high standard and we started trading in August 2021, just 7 months ago.</p> <p>We are open all year and this is my main source of income. I also have to prioritise looking after my visually impaired son and his younger brother. We do not use agents to secure bookings. We are an independent small business and being able to control the bookings calendar and juggle family needs and appointments is necessary.</p> <p>Welsh language.</p>

	<p>We are a Welsh speaking, local family, and advertise bilingually on most of our social media accounts and our guest guidebook and website are also, for the most part, bilingual. With investment, we do intend to improve our website further to be 100% bilingual.</p> <p>Our first year In our first year we foresee an estimated occupancy of approximately 110 days. This is higher than expected due to the increasing demand of staycations over the pandemic period (summer 2021).</p> <p>As a new business, we have only just qualified recently to apply for business rates and due to our personal circumstances, we have been paying 150% second home council tax at £344 a month. This has been a struggle for a new business, but we hope by moving on to business rates, which are substantially lower, this will enable us to invest further into our business and continue to strengthen our new venture.</p> <p>Currently, our main challenge in getting established is gaining visibility in order to try and secure bookings. As we target families as our main guests, we are very seasonal and depend on school holidays for the bulk of our bookings. Any additional weekend bookings are a bonus.</p> <p>The first year of business has worked well with my family's needs. I have been able to work hard and earn an income as well as balance some essential time to support my children whom both have their own challenges and needs in what has been a difficult time for many. Having had to give up my main teaching job a few years ago (due to stress), I've also been able to look after my own mental health by balancing work I am able to undertake from home, supporting my family and my own wellbeing.</p>
<p><b>Impact on the business of 182 threshold</b></p>	<p>Securing 182 days of annual bookings will be a significant obstacle for us. As a seasonal business, which depends on family bookings over the school holidays, hitting 182 days of bookings is an enormous, and unrealistic challenge. Secondly, even if we were able to secure 182 days bookings our family's needs and wellbeing would be compromised. I would not be able to support my children's needs especially my visually impaired son nor my own wellbeing. I estimate oil, utilities , mortgage, cleaning, laundry costs and other bills associated with running the business amounting to approximately £20,000, possibly more with the ever increasing costs. The estimated figure does not include council tax payments. We would hope to maintain 110 days let in our second year of operation and around 120 days in our third year. Dependent on the cost of living crisis, pandemic and the unsettling events in the Ukraine, which have led to spiraling energy costs, supporting genuine small businesses, who do so much for the local economy, could not be more crucial at this time.</p>

	<p>Even at the current rate of 110 days of bookings the business is still operating all year round. On the days where we do not have any guests in the cottage, I need to undertake essential administrative work, laundry, and maintenance work. Self-catering cottages face a significant amount of wear and tear, and therefore additional days are required to undertake the necessary maintenance and upkeep work to maintain the cottage's luxury and high-quality standards.</p> <p>Having more days booked would mean these essential tasks would be difficult to complete. I would not be able to afford more staff to undertake these tasks either.</p> <p>At 182 days of bookings, I would struggle to complete all the essential work and tasks required to run a high standard, luxury self-catering business.</p>
<b>Personal impact</b>	This level of business would also lead to my own health suffering, and I would not be able to support the needs of my family.
<b>Turnover</b>	As we have only been opened 7 months, we estimate that our first year's turnover will be approximately £25,000.
<b>Incremental cost of Council Tax at cost</b>	We already pay 150% council tax at £3400 a year. This is on top of our mortgage payments (£600 per month/£7,200 per year) and the astronomical oil and energy bills.
<b>Incremental cost of Council Tax at 200%</b>	If we were to pay 200% council tax, it would amount to £4580 a year
<b>Incremental cost of Council Tax at 300%</b>	If we were to pay 300% council tax, it would amount to £6880 a year
<b>Planning Permission restrictions</b>	Our mortgage only allows us to operate as a holiday let
<b>Any Other Comments</b>	

<b>Business Details</b>	Cottages, Aberfforest, Pembrokeshire Coast National Park
<b>Short Description</b>	<p>We have been trading since 2009. Prior to that we were customers at one of the cottages, which had been trading since approximately 1990. Our second cottage was converted by us in 2013 using local builders and architects from an adjoining stable. One Cottage sleeps 6, The other sleeps two. We have a very attractive coastal location in the Pembrokeshire Coast National Park, about 150 metres from the coast path and a small-semi private beach. The properties are professionally marketed and managed by a local agency and local people are employed as housekeepers/gardeners etc.</p>
<b>Impact on the business of 182 threshold</b>	<p>In a typical year we would receive bookings between March and October. Outside this period there is little interest, as the weather is not reliable. Pre-pandemic we had bookings for approximately 110 nights in each property. Last year the figure was somewhat higher, but we believe that this is a temporary situation caused by the pandemic, with people less likely to travel abroad. Were the legislation to go ahead,</p>

	<p>we would be forced to move from business rates to Council Tax. If the latter were levied at three to four times the normal rate it would make the business unviable.</p> <p>Approximately 70% of our turnover is spent locally in agency fees, housekeeping, maintenance and improvement etc. All this would be lost to the local economy, as would the money spent by our guests with local businesses.</p>
<b>Personal impact</b>	<p>We would be forced to cease trading and, since we would still be liable for a multiple of Council Tax, we would need to attempt to sell the properties. These do not have planning permission for permanent occupation and the location and size makes them unsuitable in any case. Almost certainly we would have to sell at a considerable loss in capital value as any new purchaser would also have to pay the higher level of Council Tax.</p>
<b>Turnover</b>	<p>Our 2019 Turnover was £20,305. In 2021 it was £26612. Typical annual profit is around £5k.</p>
<b>Incremental cost of Council Tax at cost</b>	<p>At 100% council Tax: £2565</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>at 200% Council Tax: £5131</p>
<b>Incremental cost of Council Tax at 300%</b>	<p>at 300% Council Tax: £7697</p>
<b>Planning Permission restrictions</b>	<p>The properties are converted farm buildings without central heating, accessed by a long and poorly-maintained farm track (not ours). There is a planning restriction which only allows holiday rental use.</p>
<b>Any Other Comments</b>	

<b>Business Details</b>	<p>single rural 1 bedroom cottage that has been trading for 30 years either for longer term or short term lets.</p>
<b>Short Description</b>	
<b>Impact on the business of 182 threshold</b>	<p>As we cannot guarantee that every year we will meet the 182 day threshold (2019 - 108 days let , 2020 - 211 days let) we will have to seriously reconsider the benefits of letting the property and probably stop, especially if we are at risk of paying the full rates or enhanced rates. Though I will lose out financially, it is those we employ and those who rely on tourist trade in the area who will lose the much more. the Such a move will reduce the availability of properties to let, drive prices up and reduce tourist numbers.</p>
<b>Personal impact</b>	<p>The impact on me personally will be hugely disappointing, I do not want to lose a property that has been in my family for 80 years, which was under used and neglected for 40 years and only since we have renovated (using local businesses only) have we been able to give back to the community by offering a place for tourist to visit and stay all year round. If the 182 rule is brought in, the financial sense of the business is removed it will mean we stop letting out the property, stop employing those who look after the property. We</p>

	always use local businesses for maintenance and up keep, cleaning and gardening and waste disposal.
<b>Turnover</b>	Turn over 2019 = -£3,793, 2021 + -£6,165
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1177
<b>Incremental cost of Council Tax at 200%</b>	at 200% Council Tax: £2354
<b>Incremental cost of Council Tax at 300%</b>	at 300% Council Tax: £3531
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	A 2 bedroomed converted mill, Llyn Peninsula, North Wales.
<b>Short Description</b>	The building was converted from a former derelict agricultural building by my husband and myself and has never been a home. We spent many thousands not only converting the building to a very high specification but also installing a sewerage plant and ground source heat pump, together with a bore hole as it is in a rural location. When we purchased the building we were told that it could only be used as a holiday let and that it could not be a second home, or even a first home. We appreciated that the reason for this was that a holiday use only restriction would bring income into the local economy. People spend money when they are on holiday, by visiting local attractions, eating out (most of our guests eat out) and spending money in local shops. Not only that, we used local labour to convert our building, we use local trades to maintain it and a local housekeeper to turn it around.
<b>Impact on the business of 182 threshold</b>	I was very dismayed to learn that the Senedd had proposed a ruling that a holiday let must achieve 182 days booked in order to qualify for business rates. I really don't think that this is realistic given the nature of the holiday season in North Wales. The building is available 365 days a year but very few people want to come in the winter, despite us having underfloor heating and wood burners. I believe that most people who go away in the winter choose either short breaks in cities or travel to warmer countries. My own data reflects that they certainly don't want to come to rural Wales. I consider 2021 to have been a very good year, and in that very good year I managed to achieve 163 days. 2021 was an exceptional year, many of my guests would normally have holidayed abroad but covid stopped them from travelling. Bookings are slow this year.....which is why I think that those who are able to do so will go abroad but many more are only just about affording to heat their homes and don't have money for holidays. I have had cancellations in the last few days as people can't afford to go away at all.
<b>Personal impact</b>	The council tax premium would be catastrophic for my business. I am currently having sleepless nights over this new

	<p>ruling. I understand the negative impact of second homes on the community, but I urge the government to consider proper bona fide businesses.</p> <p>It would be very difficult for me to pay council tax if I don't achieve 182 days....and 182 is looking very unlikely at the moment. I would be able to just about pay business rates, but on a holiday let only business I think it would be very unfair for me to have to pay council tax when I already pay income tax and this is a business, not a home and never was a home. It would be unviable to pay even a 200 per cent premium as I pay a fortune in heating, and pay my local housekeeper, who is a fair rate. If the business were to fold then she would lose a good part of her income. I also pay out advertising and other associated costs, water testing, gas safety certificates, sewage tank emptying, specialist holiday let insurance etc etc. I know my property provides income to the local economy and income for my housekeeper. Please, please consider a more realistic number of nights let, 120 to 140 is far more achievable.</p>
<b>Turnover</b>	My turnover in 2019 was £8405.64 and turnover in 2021 was £15,915.04. That's turnover, before all the expenses, before any profit.
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £2305.49
<b>Incremental cost of Council Tax at 200%</b>	at 200% Council Tax: £6916.47
<b>Incremental cost of Council Tax at 300%</b>	at 300% Council Tax: £9221.96
<b>Planning Permission restrictions</b>	As I mentioned earlier, my property can only be a holiday let, its planning does not allow for it to be a second home or a main residence for anyone, including tenants. No one person can reside there for more than 28 days in a year.
<b>Any Other Comments</b>	

<b>Business Details</b>	I own one self-catering holiday property in a rural location near Solva, Pembrokeshire.
<b>Short Description</b>	The property currently has a 5* rating with 'Visit Wales'. I manage the holiday cottage as a business and have done so for the past 6 years.
<b>Impact on the business of 182 threshold</b>	The impact on the business of the 182 day threshold will be significant. This is because it is going to make the business potentially unviable, because if I had to pay Council Tax, (alongside the huge rise in energy bills) my annual profit margin would be significantly reduced. I currently make the property available for lettings 310 days per year, but actual days let varies from year to year (Details can be found below). I also feel that my accommodation attracts visitors to Pembrokeshire therefore indirectly supporting other businesses in the area such as bars, restaurants and activity businesses. Other businesses also benefit from the property



	as a result of laundry, cleaning and maintenance. Analysis of my bookings indicates that I am enjoying a significant number of repeat bookings, which shows that visitors enjoy the area and my accommodation. If I had to pay Council Tax, I may have to consider closing the business, and this would consequently be a loss to the other businesses and tourist attractions in the area.
<b>Personal impact</b>	The impact on me personally of the 182 day threshold will be devastating. 100% of my annual income comes from my holiday let business. Over the past 6 years I have strived and succeeded in continuously improving and maintaining the standard of the property and grounds it sits in. To have to consider giving up the business as a result of it not being viable is heartbreaking, considering the time and effort that has gone into its development and ongoing success.
<b>Turnover</b>	My annual turnover for 2019 was £13,748 where I had bookings for 110 days. My annual turnover for 2021 was £23,590 where I had bookings for 182 days. Even though I enjoyed more bookings in 2021, I feel that this is a direct result of more people holidaying in the UK rather than abroad due to the pandemic. Therefore, moving forward I cannot guarantee that I will meet the 182 day threshold.
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £2568
<b>Incremental cost of Council Tax at 200%</b>	at 200% Council Tax: £5136.
<b>Incremental cost of Council Tax at 300%</b>	at 300% Council Tax: £7704
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Holiday cottage in Newport
<b>Short Description</b>	One holiday cottage, been trading for 18 years, in a prime location in Pembrokeshire, directly on a quiet beach in the Pembrokeshire National Park, with unobstructed full sea views, available for between 240-255 days every year (depending on the amount of maintenance we have had to do, though one year it was available for 216 days due to major work at the house), 112-140 days of bookings, depending on the Welsh weather that year (one year we achieved 150 days due to a better weather giving us a longer season). A local Pembrokeshire holiday rental business manages our bookings, we have a website and also use social media to promote our cottage.
<b>Impact on the business of 182 threshold</b>	Our business would not achieve the 182 days threshold as shown above. It is nothing to do with having the property

	<p>more available for letting, it is available to let by Coastal Cottages of Pembrokeshire for close to 250 days a year. We proactively market it ourselves too.</p> <p>The additional council tax costs will need to be fully passed on to our guests.</p> <p>I have reluctantly passed on the increased fuel charges for the rest of this year to any new bookings. As we cannot guarantee the number of days let each year, any holiday cottage businesses who decide to continue, will have to cover the cost of this tax in the assumption that 182 days will not be met. When marketing is already maximised, this can only be through pushing up prices, reducing costs, crossing fingers and hoping that the guests continue to come.</p> <p>The only way to reduce costs without impacting quality of stay for guests could be done by finding a local resource to manage the changeover and reluctantly finding a cheaper way of letting, both of which impact our local agency's business. In addition, we would need to do more maintenance ourselves, again reducing the income of local businesses significantly. Ultimately it will become a balance of the income versus the costs and the hassle of letting a business without the use of some high quality local service companies who have supported our business for the last 18 years,</p>
<p><b>Personal impact</b></p>	<p>Assuming we increase the rental prices, we will get fewer guest so lower income. Lower income means we have to reduce costs so we would need to do more work ourselves at the cottage – Winter clean and freshen up, Decorating and keeping the property up to date, additional maintenance, ..... that we would currently use a local business to do. Also, I would have to manage the bookings myself through AirBNB which takes away the local Pembrokeshire welcome and care of Coastal Cottages and after 18 years of excellent service, I would be very reluctant and sad to do this.</p> <p>We do not intend to sell our cottage, and even if we did, we would expect the sale to go to sealed bids as it did when we bought it so the purchaser would be a wealthy second home owner who did not worry about paying council tax fees if they win such a perfect second home location and that would think nothing of closing a successful holiday cottage business.</p> <p>We have worked hard on our holiday cottage business, with many returning guests so I am so disappointed about this draft legislation. The Welsh Government seem to have under-estimated the length of the holiday season in a lot of Wales. Local businesses and attractions clearly show the reduced presence of holidaying public by partially closing off-season, especially in northern Pembrokeshire away from the bustling south coast seaside towns. How can the major ramifications of such a legislation on the Self-catering holiday business be justified by saying that it will bring more local</p>

	houses into local ownership and keep the Welsh language alive without realising the impact on the local economy and jobs.
<b>Turnover</b>	Year ending Apr 4th 2019 - £14693 Year Ending Apr 4th 2021 -£12741
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1911.41 (estimated)
<b>Incremental cost of Council Tax at 200%</b>	at 200% Council Tax: £3822.82
<b>Incremental cost of Council Tax at 300%</b>	at 300% Council Tax: £5734.23(82% of the fee we pay Coastal Cottages for booking fees and guest services,our cleaners and gardener fees)
<b>Planning Permission restrictions</b>	<p>The only restriction to letting is the location and seasonality of northern Pembrokeshire.</p> <p>The major towns in the south of Pembrokeshire get bookings all year round. A friend of mine with a cottage in Saundersfoot confirmed her cottage will exceed 182 days a year as the visitors come every month of the year. I have looked back over the last 7 years and we have had no more that 1 week booked in any February, typically 1-2 weeks in any March and 1-2 weeks in any April – giving us a range of 2-4 weeks of bookings between January and the end of April. Similarly, we have had no more that 1 week booked in any November and have not had a booking in the 3 weeks before Christmas for the last 7 years (I have not checked before that).</p> <p>As we saw this year, despite visitors being able to come, restaurants and coffee shops close or have seriously reduced hours in November and especially in January and February.</p>
<b>Any Other Comments</b>	

<b>Business Details</b>	We have 2 lodges and one brick bungalow on our working farm.
<b>Short Description</b>	Located in an isolated valley 9 miles from the nearest shop. Started trading in 2006 with help, support, and encouragement from the Welsh government we diversified into self-catering on the farm. Our first lodge was built in 2006, second in 2010 and bungalow in 2018.
<b>Impact on the business of 182 threshold</b>	All 3 places would fail to meet the 182 days, bookings in 2019 were between 105/140 days for the 3 places. But because of the increase in council Tax, our business would fail and would mean us selling up and the loss of high quality 4 Star self-catering accommodation in the area resulting in less income for the local restaurants and shops which all my guests use.
<b>Personal impact</b>	The impact of chasing these unrealistic targets on our family would seriously damage our mental, physical health. Leading to financial ruin, we would not just lose our business, but our home as well.

<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £5,285.34
<b>Incremental cost of Council Tax at 200%</b>	at 200% Council Tax: £10,570.68
<b>Incremental cost of Council Tax at 300%</b>	at 300% Council Tax: £15,856.02
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	One cottage converted from a group of stables into a luxury 3 bed (6 person) holiday let.
<b>Short Description</b>	Details of business - It is in a rural location close to a beach and perfect for holidaymakers who enjoy the coast, walking surfing and for families. The cottage is run and managed by Coastal Cottages of Pembrokeshire.
<b>Impact on the business of 182 threshold</b>	<p>This is my first year of trading. I only took 4 weeks of bookings last year as it takes time for business to build and reputation to be earned. This year I am hoping for more (the cottage is available for 52 weeks of the year) but it is unreasonable to expect that it can go from nothing to 182 days in a short space of time. In the meantime I am crippled with 200% council tax which my current bookings will not cover, let alone the rising costs of fuel and wages for cleaning etc. This will not be a viable business if this new rule come into force and I may be looking at having to sell the property if I can't turn a profit within 3 years. I have yet to reach the current threshold of days, let alone the new suggestion for 182 days. I have spent over £60k in renovations in making it suitable and safe for holidaymakers. This is not a second home - it is fledgeling business, into which I have invested my retirement fund. I hope you will re-consider the proposal or at the very least make new business and those that struggle in rural and remote areas as special cases. We are working hard in our own communities to keep these areas alive and renovate and maintain disused buildings and are being cruelly penalised for it.</p>
<b>Personal impact</b>	<p>The impact on me would be devastating. I have retired early so that i could follow my dream of owning a holiday cottage that welcomes visitors all year 'round. This property has to earn it's keep. As already stated I have spent £60k in renovations and in making this property suitable and safe for families and less able people so that they can enjoy our beautiful coastline. I am committed to improving the local economy with most visitors to this area eating and drinking and shopping in local establishments. It makes me very sad to think that this may not be a viable option for me now. If I sell, the property may well fall into the hands of a person</p>

	<p>who would just use it a second home and this makes me very angry as I have all the best intentions for its use in keeping the local area vibrant and alive.</p> <p>I think there should be at least a sliding scale of days to help new business start ups, rising to 182days only after 3-5 years.</p>
<b>Turnover</b>	In 2020-2021 - This was my first year I took a total of £2000. This was before any costs. I obviously made no profit this year. My first year accounts are still pending.
<b>Incremental cost of Council Tax at cost</b>	I currently have to pay council tax as I am in my first year of trading I pay £2700 per annum, which is 2 x the private council tax as I am classed as a second home
<b>Incremental cost of Council Tax at 200%</b>	at 200% Council Tax: £2700
<b>Incremental cost of Council Tax at 300%</b>	at 300% Council Tax: £4000
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	holiday Cottage, Llanwenog
<b>Short Description</b>	<p>One holiday cottage created from rebuilding and renovating my derelict outbuilding. A rural setting and trading for 15 years since April 2007. The property is in a rural setting and roughly 15 miles from the coast. More guests might, in this present climate of expensive fuel, plump for a coastal property as it would entail walking to the beach as opposed to driving. However, I intend to put as much effort as I can into maintaining the high standard I have already achieved, the property was awarded 5 stars immediately it was open for business.</p>
<b>Impact on the business of 182 threshold</b>	<p>The 182 nights target might be difficult to achieve for the reasons stated above, I reached 175 nights booked in 2018, but hopefully I can do so as families venture out once again with COVID restrictions easing. My property is open for booking 365 days of the year, including Christmas and the New Year. Despite wonderful reviews from past guests, it's still up to the general public where they want to holiday. The holiday cottage business brings in good revenue to this county of Ceredigion and to Wales.</p>
<b>Personal impact</b>	<p>Personally, it would be financially devastating for me if I have another council tax to pay. I live alone and run the business alone on a small pension and my cottage provides me with a better standard of living, hence not having to rely on council/government handouts and support. The place pays for itself and makes a small yearly profit but expenditure is high in keeping it up to a high standard. I created the dwelling by rebuilding and renovating my derelict outbuildings, I put all my money, including a retirement lump sum, into the renovations. Having to pay another council tax every month would severely deplete my income</p>

	and probably like others in this situation, I would have to consider selling or closing etc and this would have a domino effect on other businesses, such as agents, shops cafes, pubs etc. The property has been in my family for 117 years since 1905 and my planning permission does not even allow me to house any of my children despite the fact that they were brought up here.
<b>Turnover</b>	Turnover for 2019----£10,882. Turnover for 2021---- £11,047
<b>Incremental cost of Council Tax at cost</b>	I don't know what Tax I would have to pay exactly and the criteria Ceredigion County Council would deem the property liable for such tax .It is a 2 bedroomed, two bathroom cottage.
<b>Incremental cost of Council Tax at 200%</b>	At 200% I would probably have to close.
<b>Incremental cost of Council Tax at 300%</b>	At 300% I would have to close.
<b>Planning Permission restrictions</b>	I am severely limited by the planning permission granted to me and I quote " The holiday unit hereby granted full planning permission shall not be occupied by the same person(s) for more than 28 consecutive days...." Also , I quote " the holiday unit hereby granted full planning permission shall be used for holiday purposes only...". Ceredigion County Council, 5th March 2005.
<b>Any Other Comments</b>	

<b>Business Details</b>	One bedroom holiday let that is annexed to my permanent place of residence.
<b>Short Description</b>	We are in a rural location and have been trading for 19 years. The cottage is only suitable for couples or individuals and together with our location mainly attracts older clientele who normally prefer out of season holidays.
<b>Impact on the business of 182 threshold</b>	We would normally expect on average 70 to 90 days booked per year, which is a long way short of the 182 day threshold. As a small unit in this area we are limited on what we can charge. As the cottage is annexed to our main residence it cannot be used for other purposes. The income from the cottage is very modest and a rate rise would represents around 25% of gross income.
<b>Personal impact</b>	The cottage is now the only income that I personally have, and although small, makes a positive difference to our finances. Together with various other increases it is becoming difficult to make a worthwhile income.
<b>Turnover</b>	Turnover for 2019 was £4084
<b>Incremental cost of Council Tax at cost</b>	Tax due without SBRR £909.50 and has a rateable value of £1700. We are already paying £2550 for our 3 bed cottage which the holiday let is annexed to.
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	



<b>Planning Permission restrictions</b>	As stated above, as the holiday let is annexed to our main residence it cannot be used for other purposes.
<b>Any Other Comments</b>	

<b>Business Details</b>	Converted barn on my farm
<b>Short Description</b>	
<b>Impact on the business of 182 threshold</b>	<p>Over the last 20 years I have never been able to rent the accommodation for 182 days a year and this will not change in April 2023, particularly with the pent-up demand for international holidays now post pandemic, the increased running costs for electricity and heating oil in rural areas making margins extremely tight and uneconomical in the colder winter months to even try and get more bookings even if I could. If this change goes ahead as planned, then in April 2023 my converted barn on my farm (not a second home or even a home) will be removed from business rates, given a council tax band and then if my local authority decides to introduce and enforce a 300% second homes council tax premium, I will be facing a 400% council tax bill which will run into the thousands of pounds every year. This will be devastating and catastrophic for my small holiday rental business on my farm, and will not make it viable any more as a direct result of Welsh Government intervention. As I can't rent the building out as a home, or use it as a home due to planning restrictions, then one of the options I am seriously having to consider is to demolish the barn to prevent facing the crippling and unsustainable council tax bills. The Welsh Government has created a financial straitjacket for my small business and many others are in the same situation, particularly in rural Wales. At a time of financial uncertainty and rising costs (which I'm sure you must be aware of), I worry about the stress and strain this change is placing on people, their well-being and mental health, I know as it is causing me great distress and worry.</p>
<b>Personal impact</b>	
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	<p>I only have planning permission to use my converted former barn on our working farm as holiday accommodation, and as such don't have the option to use it as a permanent home, rent it as a permanent home, and it is not possible or appropriate to sell the building as it is on our farm yard. It is not a threat to the existing housing stock or preventing a young family of a home, but helping support the local tourism economy. I and many others over the years have</p>

	<p>been encouraged by your Government to diversify by converting these buildings into holiday accommodation and supporting the rural economy. It is clearly not a home or a second home and has never been one, yet we are being targeted, attacked and penalised by the Welsh Government as if we were a second home owner renting their property as a holiday let to avoid council tax which is so disappointing. These proposed changes are making me regret ever converting the building into a holiday let, and I'm sure will prevent many others from doing so in future.</p>
<b>Any Other Comments</b>	<p>It would be unimaginable to say to a hairdresser that if they don't do a certain number of haircuts a year, or to a car mechanic if they don't service a certain number of cars a year then they will be penalised and taxed differently, much higher devastating their business, but this is exactly what you are doing to genuine self-catering businesses in Wales. I have loved welcoming tourists for the past 20 years and had felt that I was making a positive contribution to my local area and economy but not any more. The Welsh Government through this decision as part of your co-operation agreement, has now made me and my contribution feel totally devalued and worthless.</p>

<b>Business Details</b>	<p>I have a furnished holiday let at Ceredigion on the Pembrokeshire Coast.</p>
<b>Short Description</b>	<p>It's a 2 bedroom (sleeps 4) semi detached barn conversion - one of three purpose-built in the 1980s as holiday homes, although no restrictions apply. 2022 will be my seventh year of trading.</p>
<b>Impact on the business of 182 threshold</b>	<p>If the new 182 threshold were to be introduced, the impact on my business would be severe, as I have not consistently achieved this level of nights let, even though I consider my property to be in a high-demand location. Additionally, I'm predicting a downturn in business due to the lifting of overseas travel restrictions, bargain package holidays as travel companies entice people back abroad, plus the general rise in prices of essential goods due to the large rises in fuel prices.</p>
<b>Personal impact</b>	<p>The impact on me personally would also be substantial as the let makes up around 40% of my income, with all the caretaking work done by myself. This for me is not a "second home", it's actually the only property that I own, as I currently live with elderly parents to provide care (unpaid). The house is there waiting for me to occupy it when the time comes. The rest of my income is also reliant upon tourism, and although it's low it enables me to live and be part of the community here, as long as I live frugally day to day.</p>
<b>Turnover</b>	<p>My turnover in 2019 was £15,464, and in 2021 was £16,491, with my profits being £4,500 - £5000 (excluding 2020).</p>

<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1539
<b>Incremental cost of Council Tax at 200%</b>	at 200% Council Tax: £3078
<b>Incremental cost of Council Tax at 300%</b>	at 300% Council Tax: £4617 (i.e. NO profit)
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	The property is situated between Porthmadog and Criccieth in a rural setting.
<b>Short Description</b>	8 years ago we took on a dilapidated Grade II* listed manor house complex set in some 15 acres of grounds comprising two ancillary cottages and a large number of dilapidated outbuildings (cottages and some of the outbuilding listed Grade II). Over the past 8 years we've gradually done up the two cottages (sleeping 4 and 5 respectively), created 3 apartments (each sleeping two) in the service rooms at the rear of the manor and implemented a programme to re-roof and make safe the majority of the outbuildings nearest the manor and cottages. This programme is ongoing and requires sufficient time without guests present to complete. We are furthermore renovating the main manor house to create more accommodation for holidays and events (weddings) so it once more serves a purpose and can be safeguarded for the future.
<b>Impact on the business of 182 threshold</b>	As described above we need time without guests present to complete our programme of restoration and renovation and to continue the ongoing maintenance of this large complex. This cannot all take place in the low season winter months due to the vagaries of weather conditions. 182 days occupancy is not 50% of the year but 75% of the year that we tend to get bookings (winter months being notoriously difficult to let due to weather and local attractions being closed) and is an unrealistically and arbitrarily high number (which is also not imposed on any other business either in tourism or otherwise!). We have run the business on the basis of attracting profitable bookings, not simply nights occupied - this would be a race to the bottom. Our business model & plan, drawn up with support from and for Finance Wales, is based on providing quality accommodation in a special setting at appropriate prices, not on high occupancy at cut-rate prices.
<b>Personal impact</b>	On a personal level, we have put every penny we own (and a fair few we don't) into getting a business up and running. If this business were now to fail (and there is a real danger it will due to the proposed and externally imposed conditions) we would struggle to recoup any of this. Apart from COVID grants, we have not received any financial support and nor have we asked for it. We have so far largely managed to

	balance our income (through bookings but also loans and, due to COVID, the cashing in of our pensions) with the outgoings (and many tens of thousands of these are spend locally on supplies, trades and cleaners) necessary to grow our business. Forcing us to prioritise occupancy beyond a level that is reasonable would upset this fine balance and endanger our entire investment and future solvability. This business is our sole income and will need to serve as our pensions.
<b>Turnover</b>	Our turnover in tax year 2019/2020 was £58,477 Our turnover in tax year 2021/2022 was c. £78,780 (accounts still to be finalised)
<b>Incremental cost of Council Tax at cost</b>	£3,365.69
<b>Incremental cost of Council Tax at 200%</b>	£6,731.38
<b>Incremental cost of Council Tax at 300%</b>	£10,097.07
<b>Planning Permission restrictions</b>	While potentially not constrained by planning, it would be impossible for us to let the cottages on an AST or sell them off: they are part of the Manor House complex and structure, there is no private access and they share the same outdoor spaces and many of the services of the rest of the complex. Separately, we have tried to make some of the outbuildings which are slightly further removed from main house available to interested (local) parties for conversion into homes, but this has every time failed due to only being able to get planning permission for holiday lets or second homes (anyone spotting the irony here?)
<b>Any Other Comments</b>	

<b>Business Details</b>	Holiday cottage in Tregaron Ceredigion.
<b>Short Description</b>	We are a single self catering Holiday Cottage that sleeps six people. My husband and I are both retired and we invested our pensions into forming this small business on our smallholding, to enhance our retirement. We have been running the cottage now for three years. We have been subject of Small Business Rates Relief for two years.
<b>Impact on the business of 182 threshold</b>	Last year 2021, during the pandemic we achieved 218 days rental. This however was extra ordinary with the very high demand for domestic staycations. We are based 8 miles from the Coast and find that during the winter months when local attractions are closed we struggle to gain occupancy, although we are open for bookings all year round. This year our

	bookings are very sparse and we are unlikely to achieve the 182 day occupancy threshold. The reason being that we face another unique problem, in that the Public are hesitant to book holidays due to the galloping rates of inflation. There is no Confidence in spending, and won't be for at least the next twelve months. It is a bad year to try and achieve a very high Threshold and Grossly unfair to small struggling Businesses such as ours.
<b>Personal impact</b>	The impact of the above figures would force us to have to sell our property as the business would not be financially viable. Our self-catering cottage is built on our smallholding and therefore on the same title deeds as the main house and cannot be sold separately. It cannot be subject to a long term let due to planning restrictions. Surely in this day and age for a Government to have such an impact on peoples private lives as evidenced above it is in breach of the Human Rights Act Article 8 (The right to a private life without Government interference).
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	£1900 additional
<b>Incremental cost of Council Tax at 200%</b>	£5700
<b>Incremental cost of Council Tax at 300%</b>	£7600
<b>Planning Permission restrictions</b>	The property is classed under Planning Restrictions as Holiday accommodation only, which means no long term let capacity.
<b>Any Other Comments</b>	

<b>Business Details</b>	holiday cottage in Aberporth, Ceredigion
<b>Short Description</b>	One holiday cottage in the seaside village of Aberporth started trading in May 2021
<b>Impact on the business of 182 threshold</b>	<p>The impact of the 182 rule on my business would mean that I would be unlikely to reach this threshold having reached 22 weeks in 2021 ( a good year ) and with 18 weeks booked so far this year,. I anticipate a few more weeks but 26 weeks is unlikely.</p> <p>The nature of the property, family accommodation in a seaside village means that there is little business outside the school holidays and especially during the winter period. The majority of businesses, pubs, cafes, takeaways in this village make their main income during the late Spring and Summer periods when the village is full of families usually with children. There is very limited accommodation in the village such that there was no availability during the summer of 2021.</p>

<b>Personal impact</b>	The impact on me personally would mean that I could not continue with the holiday cottage as the additional costs combined with the rising costs of energy would make the property unviable. The property is the only one I own and was started as a retirement income for me and my partner who owns a house nearby where we both live.
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	I paid council tax on the property until I had reached 20 weeks letting in 2021. The monthly council tax was £186 ( includes a 25% premium as classed as a second home) Clearly at 200% premium I would be paying up to £ £300/ month and at 300% I would be paying £450/ month. Having absorbed the additional energy costs which have already doubled with the costs increasing further in the Autumn I would see no alternative but to close the business and live at the property myself as there would be a financial disincentive to live with a partner and I would not wish to make myself financially more vulnerable by not owning a home of my own. Having bought, renovated and made the property fit for rental in 2021 I have yet to make any profit so have not included my turnover for 2021. If these changes are approved a number of people like myself and those running local businesses will lose important income without affecting the overall housing supply locally.
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Studio flat in Tregaron, Ceredigion
<b>Short Description</b>	Our holiday let, which accommodates two guests, is a 44m2 studio flat converted from the granary (upper level) of a 200+-year-old stone barn. It is adjacent to our residential house. We converted it in 2017 in order to provide us with financial support in our retirements, and have accepted guests for over four and a half years. Our location is outside a small market town at at the edge of the Cambrian Mountains. Although it is not a very well-known holiday destination, the tourist industry has long been a valuable part of our local community's economics.
<b>Impact on the business of 182 threshold</b>	Our holiday let supplements our pensions and provides financial support to our retirement. We rely upon this income. We are, however, approaching the age when we will eventually need to slow down and not take quite so many bookings - certainly not 182 days per year. The conditions for our planning approval and for qualification as a furnished holiday let were that we accept guests for a minimum of 70



	<p>nights a year, and that is what our business model is based upon. Without the business we will be financially stressed, as well as having a property with an un-usable and un-lettable accommodation in it. The proposed changes will also have negative impact upon the entire community in which we live. Local shops, restaurants, tourist destinations, and support businesses such as laundry services and cleaning contractors all depend upon tourism. These changes would be detrimental to entire local economy, to say nothing of the entire important Welsh tourism industry. We benefit from full small business rates relief, and if we did not receive SBRR, we would have to very seriously re-consider the viability of our FHL business.</p>
<b>Personal impact</b>	<p>Additionally, one of us has recently been diagnosed with cancer and had three surgical procedures - one in November, another in December, and a major surgery in January of this year. The other of us has been serving as carer, and we are both required to shield, as COVID can be deadly to cancer patients. At a time when we would normally be looking to ramp up our business, we have had no choice but to instead temporarily close our holiday let for several months. During 2022 and 2023, trying to achieve 182 days of bookings would simply be impossible at the same time as undergoing cancer treatments.</p>
<b>Turnover</b>	<p>Our turnover (before expenses) for 2019 was £11,660.05, and for 2021 was £13,402.68.</p>
<b>Incremental cost of Council Tax at cost</b>	<p>£909.50</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>£1819</p>
<b>Incremental cost of Council Tax at 300%</b>	<p>£2,728.50 At that level of taxation, our business definitely would not be viable.</p>
<b>Planning Permission restrictions</b>	<p>The conversion of our barn to a holiday let was granted planning permission by Ceredigion Council with the stipulation that it be solely used as a self-catering accommodation. Long-term letting of the unit is not permitted. To ensure this, they specified that they are entitled to annually request a list of names, addresses and dates of all guests who have stayed - although they have not yet ever enforced that clause. People like us have invested our retirement funds to convert old and otherwise under-utilised farm buildings into holiday accommodations. Our building was, and is not much use for anything else, and our business is not denying any locals of housing.</p>
<b>Any Other Comments</b>	

<b>Business Details</b>	<p>The property is a small purpose-built holiday chalet Nolton Haven, Haverfordwest.</p>
<b>Short Description</b>	<p>I have owned this freehold property since October 2001 and have let it out commercially every summer season since then, i.e. 20 years.</p>

<p><b>Impact on the business of 182 threshold</b></p>	<p>The chalet sits at the most economical end of the Pembrokeshire holiday accommodation market (my average charge 2021 c. £440 pw) and appeals to families with younger children in school holidays and older retired couples during term time. Over the years demand has steadfastly remained modest at around 10/12 weeks (70/84 days) per summer season, but the property fills an important niche for those on a tighter budget.</p> <p>The property is of relatively lightweight construction and is therefore really only suitable for summer occupation. In colder months, increased heating costs vs lower rental rates make letting unviable and during winter months, all water is drained to prevent pipes freezing. These factors, together with a restricted occupation clause in the original planning permission, mean I would simply not be able to meet the '252 days available' requirement.</p>								
<p><b>Personal impact</b></p>	<p>I appreciate the positive feedback I get from visitors and particularly value those who love Pembrokeshire and my chalet and return, usually on the same weeks, year after year. I provide good but basic accommodation so people can come and have a week or fortnight's holiday and have money left over to spend in the local economy on activities, meals and treats.</p> <p>My servicing and maintenance needs are met by local tradespeople and businesses.</p> <p>Council Tax would add a significant cost to my outgoings, which would almost certainly outweigh any financial benefit from letting.</p> <p>I am seriously considering selling my property. This will not free up a permanent home for a local person but will potentially take affordable holiday accommodation off the market and thereby reduce tourism income into the local economy. Any buyer using the property purely as their own personal holiday home is unlikely to spend money in the local economy to the same extent as weekly visitors having their annual special time away.</p>								
<p><b>Turnover</b></p>	<table border="0"> <tr> <td>2019 – 71 nights</td> <td>Income (before any expenses)</td> </tr> <tr> <td>£3,765</td> <td></td> </tr> <tr> <td>2021 – 112 nights</td> <td>Income (before any expenses)</td> </tr> <tr> <td>£7,005</td> <td></td> </tr> </table> <p>Demand in 2021 was unprecedented. I have never let close to that number of nights in any previous year during my 20 years of letting the property. I don't anticipate the trend lasting. But even in 2021 I could not get anywhere near the proposed '182 night's let' requirement.</p>	2019 – 71 nights	Income (before any expenses)	£3,765		2021 – 112 nights	Income (before any expenses)	£7,005	
2019 – 71 nights	Income (before any expenses)								
£3,765									
2021 – 112 nights	Income (before any expenses)								
£7,005									
<p><b>Incremental cost of Council Tax at cost</b></p>	<p>£1,665.56 (£832.78 x 2)</p>								
<p><b>Incremental cost of Council Tax at 200%</b></p>	<p>£2,498.23 (£832.78 x 3)</p>								

<b>Incremental cost of Council Tax at 300%</b>	£3,331.12 (£832.78 x 4)
<b>Planning Permission restrictions</b>	The property is a purpose-built holiday chalet where a restriction on the original planning permission means the <b>property cannot be occupied all year.</b>
<b>Any Other Comments</b>	

<b>Business Details</b>	Garth, Dinas- Self Catering Holiday Unit.
<b>Short Description</b>	Holiday Cottage. 5 bedroom, 3 bathroom property, rural location, trading for 20 years.
<b>Impact on the business of 182 threshold</b>	We do not believe as a larger property, accommodating more guests, dependent on the school holiday trade that we will be able to meet the 182 threshold required. The attraction of our property is that it can sleep larger families during school holiday periods during the spring and summer months. <b>Our property is less attractive for smaller groups of tenants outside the peak periods. We will no longer be able to operate as a self-catering holiday unit.</b>
<b>Personal impact</b>	It will be sad for us that we can no longer provide the level of <b>employment to the cleaning staff and the benefit that our tenants bring to the local shops, cafes, restaurants and the local community.</b> We will find it extremely difficult to pay the Council Tax at 200%/300% which could be close to £6,000 or £9,000pa.
<b>Turnover</b>	Our turnover in 2018 was c £13,000. (2019 was affect by floods from burst pipes caused by the "Beast from the East). 2020 and 2021 have been impacted by Covid. We anticipate Turnover in 2022 to be £15,000+.
<b>Incremental cost of Council Tax at cost</b>	£2,950 in 2022/23 x1.5 = £4,425 (Band G)
<b>Incremental cost of Council Tax at 200%</b>	£5,900
<b>Incremental cost of Council Tax at 300%</b>	£8,850
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Holiday Cottages, Devils Bridge
<b>Short Description</b>	Trading for over 20 years ( 6 years under our ownership ) Consist of 2 holiday cottages and 2 apartments on same site ( one apartment used by owners ). At present we are open to guests for 11months of the year but bookings are mainly from Easter to October when the Steam railway is operating in Devils Bridge. The cottages are located in a local beauty spot but not in a designated National Park so we don't gain the all year round trade that those areas have. <b>We presently achieve approx.. 80 to 110 nights bookings on each of the 3 properties each year.</b> Business rates are charged on 3 properties but at the moment we have 100% rate relief. The

	<p>fourth property is designated as owners permanent accommodation which we also have to use for storage and office work to enable us to run the business. We pay Council tax band D on this fourth property. If the proposed 182 night booking threshold was brought in none of our properties would reach this booking threshold so we could have to pay up to 300% council tax on each property. This would make it impossible to financially run a business on this site.</p>
<b>Impact on the business of 182 threshold</b>	<p>The impact of any rule change on my wife and I personally would be devastating. We have a mortgage on the business costing £1100/month. If we had to pay Council tax on each of the 4 properties on our site the vast extra cost would destroy our business and any hope of improving our site and the dreams of living in West Wales. Three of the properties on the site are designated for holiday use only so it would then be near impossible to sell the properties in future because any new owner would have the same problems.</p> <p>We understand the Welsh Government want to help local people in certain areas get onto the property ladder but properties classed under Planning laws for holiday use only are not suitable for permanent accommodation and shouldn't have to pay Council tax. Holiday business's in Wales need more help and support to bring extra revenue into the country not new laws which would destroy our livelihood and kill the tourist industry. You would also have a danger of leaving more empty properties in certain areas.</p>
<b>Personal impact</b>	
<b>Turnover</b>	<p>Turnover in 2018/19 £24,200  Turnover in 2020/21 £16,078  At the moment we have business rates of £2700 but have 100% relief so pay no business rates.  Total paid presently is £1500 in council tax for owners accommodation.</p>
<b>Incremental cost of Council Tax at cost</b>	2 x £1500= £6000
<b>Incremental cost of Council Tax at 200%</b>	3 x £3000 = £12,000
<b>Incremental cost of Council Tax at 300%</b>	4 x £4500 = £18,000
<b>Planning Permission restrictions</b>	Three of the properties on our site are limited by Planning Permission to only use as short term letting. One property is allowed for owners accommodation.
<b>Any Other Comments</b>	We sincerely hope the Government will reconsider this poorly thought out proposal which would only further destroy local business's and the Welsh economy in rural areas

<b>Business Details</b>	6 units at our home. Countryside location. Planning restricted to holiday-only use. 200+ year old barns converted in 2001, Llangattock
<b>Short Description</b>	Expensive to heat. We have run the business for 10 years. We target guests seeking modest, good quality, characterful accommodation. We are not able to aim at the high premium market given the size and layout of our buildings/site. 2021-22 Turnover £82k. Average 110 nights bookings per unit. Sell predominantly direct.
<b>Impact on the business of 182 threshold</b>	<p>182 nights would equate to growing by c.£50k to £132k. This entire amount and more would be consumed by extra costs: Extra Business Rates £7000, (escalates as come out of SBRR) Net cost of Flat rate VAT £13860, Agency fees at 18% £23760.</p> <p>Growth in other operating costs £25000*</p> <p>*80% of our costs are variable (housekeeping, laundry, maintenance, wear and tear/replacements, payment fees, water, oil &amp; gas, electricity etc) so would grow in line with the 66% booking growth. Our growth in winter energy costs would not be linear so the £25k is possibly too conservative. Mid-market agencies that align with our offering will help to boost occupancy, but they require we allocate them most of availability. They tend to drive prices down and commoditise the offering. We might combat a small percentage of agency bookings but the other costs will far outweigh. Note that being a 5+ unit operator, business rates grow with our turnover - it's a direct tax (pretty unfair).</p> <p>By VOA's own estimates at £82k turnover and a 13.5% Rateable Value our business should create a gross profit of £22k. Our profit would fall significantly if we sought to achieve the required 66% growth in occupancy. Absorbing the costs above combined with some lowering of prices to drive occupancy would unquestionably make us unviable. We are not able to chase a higher premium. Please look at the sums above, it's very clear.</p> <p>We have two units that we feel would be able to achieve 182 days. But four units would have to return to ancillary use (possibly temporarily converted to other commercial use). This would reduce the 'take' from Powys CC, and our visitor demand would be displaced to our competitors (the countless properties that have sprung up over the past 5 years converting domestic houses to holiday-lets).</p>
<b>Personal impact</b>	Six additional council tax listings would make our property unattractive. Estate agents have advised the market favours large properties with just two holiday lets. Rather than risk our lifetime asset we would not allow council tax listing of our 6 units. The balance of viability for our business will be eliminated by this legislation and we will need to return 4 units to ancillary use (personal home office, games room,

	<p>gym, garage, workshop, stable and storage) and then sell our home to someone more wealthy that has a much lower need to generate a letting income.</p> <p>Personally I have tried to bring the fate of farm cluster holiday sites to the attention of Welsh Government. I believe they hold a high value for Wales, for visitor experiences and the way they protect domestic housing from holiday demand. I have presented on this personally to Ministers and was commended for the clarity and quality of my analysis. Yet we have simply been bundled into the second homes issue and no thought has gone into the positive effects we bring to the wider housing issue.</p> <p>None of the Government research looked identified the way holiday-only-restricted properties act to help local housing challenges and have no negative impact on the policy objectives. This factor is not mentioned in your research papers. Personally we are devastated that ten years of building our business and contributing to our community is being brushed aside when we are innocent!</p>
<b>Turnover</b>	Turnover in 2019 and 2021: 2019: £78,733 2021: £47,424
<b>Incremental cost of Council Tax at cost</b>	Our best estimate is £10,559 However please note we would not adopt this route. Our advisors have indicated that 6 additional CT listings would impact our property value too significantly.
<b>Incremental cost of Council Tax at 200%</b>	N/A Premium CT cannot be applied
<b>Incremental cost of Council Tax at 300%</b>	N/A Premium CT cannot be applied
<b>Planning Permission restrictions</b>	YES. Holiday only use, Max 28 days, use must be associated with other buildings on site. We are legally prevented from being part of the local housing stock.
<b>Any Other Comments</b>	Welsh Government should put our properties on 100% SBRR so we are not disadvantaged vs the huge number of singular properties that have been converted from domestic housing.

<b>Business Details</b>	We have 5 holiday cottages and a small B&B with two rooms in a rural location – Llanbedrog
<b>Short Description</b>	off the beaten track with poor mobile phone signal, pathetic broadband with no hope for fibre, not on a main road (i.e. no passing trade) so rely on advertising for occupancy. We were encouraged years ago (my business has been going since 1998) to develop buildings for holiday rental purposes. I have put 24 years of my life into my property developing, improving, maintaining buildings and infrastructure. I have lived in dust, filth and spend my savings and virtually every penny earned into making this property what it is today. Not a single penny received in grants. We have hosted guests from all over the UK and the world and through them the local community has benefited from their holiday spending,



	<p>improving the lives of local people and offering them jobs. Yet you are now suggesting that you want to destroy these legitimate businesses by unfairly targeting us and blaming us for the housing shortage!</p>																												
<p><b>Impact on the business of 182 threshold</b></p>	<p>Why do you want to destroy mine and other self-catering cluster businesses that have been operating as self-catering holiday cottages for many years? As a cluster my business rates could increase from £9k to 300% council tax on every property taking this to £33,691 or worse 400% - Council tax plus 300% to £45,000 - which will make my business totally un-economic. Add to this that I am trying to avoid reaching the VAT threshold, which will force me into more Admin not only that but to increase my prices by 20% with little to claim back, as well as possibly having a knock on effect of thus reducing occupancy! Then there is the proposed tourism tax and the Land Tax that you are all looking at, again aimed at accommodation providers, and makes the whole system flawed. We are also in an area that virtually closes for 4-5 months of the year as this area is very seasonal and with the glut of unregulated AirBnB units we are struggling to meet current occupancy rates:</p> <table data-bbox="643 920 1289 1189"> <thead> <tr> <th>Occupancy:</th> <th>2019</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>(sleeps10)</td> <td>65</td> <td>84</td> <td>79</td> </tr> <tr> <td>(sleeps 6)</td> <td>81</td> <td>84</td> <td>81</td> </tr> <tr> <td>(sleeps 4-5)</td> <td>116</td> <td>81</td> <td>65</td> </tr> <tr> <td>(sleeps 2-4)</td> <td>108</td> <td>139</td> <td>71</td> </tr> <tr> <td>(sleeps 2)</td> <td>98</td> <td>102</td> <td>71</td> </tr> <tr> <td>Total:</td> <td>468</td> <td>490</td> <td>367</td> </tr> </tbody> </table> <p>Our bigger cottages are or families and are full only during the school holidays.</p>	Occupancy:	2019	2020	2021	(sleeps10)	65	84	79	(sleeps 6)	81	84	81	(sleeps 4-5)	116	81	65	(sleeps 2-4)	108	139	71	(sleeps 2)	98	102	71	Total:	468	490	367
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<p><b>Personal impact</b></p>	<p>I do not want at the age of 73 want to work even harder to meet unreasonable targets set up by someone in an office that has no idea of our business and the trials and tribulations that we endure. We also want a work life balance to enjoy the lovely area in which we live. I have contributed so much using local labour and suppliers spending over £1m over the last 25 years improving the properties I have. Why should we pay even more "tax"? I think I would be better off having a static or caravan site, illegal or not, which surround my property and again do not have to pay anything in Council tax or Business Rates! Perhaps a motel which then takes me away from self-catering and into a restaurant with rooms, or indeed a wedding venue, or let the units out as offices or workshops, again avoiding this flawed idea. If I sell up and move to a place that wants and encourages investment and tourism, the buyer would not be a local but a second home owner that has deep pockets. I am totally disillusioned with this attempt of a tax take which is impacting my mental health.</p>																												

<b>Turnover</b>	Turnover in 2019 - 2021 and occupancy levels (Reduction due to second home owners flooding the market): Self Catering: 2019 - £47,662; 2020 - £46,926; 2021 - £38,229
<b>Incremental cost of Council Tax at cost</b>	As a cluster my business rates could increase from £9k to Council Tax at:
<b>Incremental cost of Council Tax at 200%</b>	Council tax + 200% = 300% on every property taking this to £33,691
<b>Incremental cost of Council Tax at 300%</b>	Council tax + 300% = 400% on every property taking this to £45,000 - which will make my business totally un-economic.
<b>Planning Permission restrictions</b>	We are limited by planning Permission to only do short term lettings and if any restrictions apply, as far as I know?
<b>Any Other Comments</b>	

<b>Business Details</b>	One bedroom holiday cottage in rural ceredigion on family smallholding
<b>Short Description</b>	Trading 3years begin 4th in July
<b>Impact on the business of 182 threshold</b>	This proposed 182 day to be let will hugely impact my business as it's very seasonal bookings, in a rural area. With the commission companies take for advertisement having to be added to nightly fees as well as constantly rising fuel costs it's getting to the point prices are very high just to cover our costs, that coupled with coronavirus and people struggling financially there are very very few bookings coming in this year at all.
<b>Personal impact</b>	For myself and my family the effects of this change will be literally life changing for us as we are unlikely to meet the criteria due to reasons above, therefore going to be hit with 300% council tax which is hugely unfair as our cottage is NOT a second home, but a annex (barn conversion) on our family smallholding therefore we are unable to sell the cottage without selling our family home. (Everything is on one title deed)
<b>Turnover</b>	Our turnover for 2019-2020 was -£1435.00 Our turnover for 2020-2021 was £19,152.90 This figure was only reached due to the government grants without them we would still be running at a huge loss.
<b>Incremental cost of Council Tax at cost</b>	£909.50
<b>Incremental cost of Council Tax at 200%</b>	£1819
<b>Incremental cost of Council Tax at 300%</b>	£2728.50
<b>Planning Permission restrictions</b>	I'm not sure if there are restrictions upon our cottage for holiday let only but as said above it is NOT a second home it's a converted outbuilding upon our smallholding on same title deeds so I believe it's hugely unfair for us to be hit with what is effectively a way to reduce second homes in Wales.
<b>Any Other Comments</b>	

<b>Business Details</b>	Self Catering Holiday Lets, Ceiriog valley
<b>Short Description</b>	We have lived here as a family for 23 years. I am originally from Rhyl, and our children have been brought up here as bi-lingual Welsh and English speakers. We are active members of our community in our beloved and beautiful Ceiriog valley. We have converted two dilapidated farm buildings into two self-catering units, a cottage that sleeps 4 and a barn that sleeps 6-8. We have been offering holiday lets in this rural location since 2009 and it is our main source of income. We have regular, local employees who help us run the business, cleaning and doing maintenance. Our guests provide much needed income for local businesses throughout the year, visiting pubs, restaurants, local shops and attractions.
<b>Impact on the business of 182 threshold</b>	The impact of the 182-night threshold on our business would likely lead to the closure of our business. In spite of being open for 11 months of the year (closing for maintenance in January) we would only meet the threshold in an exceptionally good year. This is because of the nature of the self-catering business, with high, mid and low seasons and the need to offer short breaks off peak that usually means occupancy for weekends only. So, for a considerable number of weeks each year we will be a fully functioning business but with occupancy of 2 or 3 nights out of 7 each week (ie 30-40%, well below the 50%/182 night threshold). Paying Council Tax for each of the two properties at a rate potentially multiplied by up to 300%, would cripple us and would likely lead to the closure of the business. Our beautiful, secluded, rural location is ideal for holidays but might well not be suitable for short-term letting.
<b>Personal impact</b>	Apart from the financial implications, we would be very sad as a family to not be able to welcome guests from all over the world to experience the beauty, the friendliness and the riches of our valley and Welsh culture. To be honest, we would feel bitter and angry that our own Welsh government had effectively closed down such a positive Welsh business. We invested our time, love and money in creating holiday properties from derelict, tumble-down buildings. We have taken no housing stock off the market. We are not casual, visiting, second homers gaming the system. This is our livelihood. We live here. Why would the Welsh government do this to us?
<b>Turnover</b>	Our gross turnover in 2019 (Jan 1-Dec 31) was £34,000.
<b>Incremental cost of Council Tax at cost</b>	£4,256 (£1,741 for the cottage and £2,515 for the barn)
<b>Incremental cost of Council Tax at 200%</b>	£8,512
<b>Incremental cost of Council Tax at 300%</b>	£12,768, well over a third of our turnover
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	A barn conversion to a bunkhouse on my farm in North Carmarthenshire Brechfa, Carmarthenshire
<b>Short Description</b>	<p>The property has 7 family size bedrooms and can sleep groups of up to 32 people. The building was an old stone barn which was in a poor state of repair when I purchased the farm, the roof had collapsed and the gable wall was falling away. If it had not been possible to obtain planning permission for conversion to holiday accommodation the only safe and financially practical option would be to have pulled the barn down as it would have been more expensive to repair than replace with a modern barn. The barn conversion was completed in 2007. Most bookings are for a weekend break for multi generational extended families, or groups of walkers, mountain bikers, or groups of friends meeting for a reunion / celebration.</p>
<b>Impact on the business of 182 threshold</b>	<p>Bunkhouses provide self catering accommodation so will be caught up in this change but we do not have the same occupation pattern as a small domestic size property. While a small property may be able to get a week long booking by an individual or couple during term times, therefore achieving 7 nights occupancy but just the income from a single person, I would have a large group of people but for a weekend only so have a higher turnover than a small property but would only achieve 2 nights occupancy. During Spring and Summer I normally have 3 weekends a month booked by a group of 16 plus people. Plus of course Christmas and New Year. Bookings tend to be slow / light in autumn and winter. The property is only booked mid week during school holidays and then its usually for short breaks and therefore I have the higher costs of multiple changeovers. The property takes 16 hours to clean and turn around plus laundry for each changeover. Taking mid week bookings from individuals to increase the number of nights occupied would not be a viable option. While hostel accommodation is popular with young backpackers in winter in cities, that pattern does not apply to a Welsh hill farm. The overheads of heating and lighting this size of property and the time taken for cleaning mean that bookings from an individual or small number of people would not cover the operating costs. It would also put animal welfare at risk, the extra change overs and dealing with extra admin would effect the hours I am available to do farm work. The bunkhouse is an essential element of making the farm financially viable. - Its a small upland farm which I brought in a run down condition from a farmer in his 90's who had been too frail to go upstairs in the farm house for 16 years. The profits from the bunkhouse are currently supporting the renovation of the rest of the farm and the farm house. The</p>

	<p>additional taxation bill from this legislation will hit my ability to undertake work to bring the farm back to being a viable business demonstrating carbon sequestration integrated into a viable small farm. Bunkhouses are very price sensitive, and we compete with properties in England for bookings. The increase on taxes from both this and the proposed tourism tax would put all Welsh bunkhouses at a competitive disadvantage.</p>
<b>Personal impact</b>	<p>I am not a farm housewife, running a barn conversion holiday let while my husband runs the farm. I am a professional single woman who runs the farm, one element of which is tourism accommodation. I could not achieve the 182 occupancy level. I am worried sick about the financial impact of this plan. Especially as I had to dip into my savings because English bunkhouses had clarity from the English Government on reopening for the school holidays in 2021, but Welsh Government did not provide the same level of clarity for businesses dependant on multiple households staying together. A bunkhouse is clearly a business property, and a barn conversion on a farm to business use is clearly not taking up affordable accommodation for families. I have put a lot of work into ensuring that guests staying at my property spend their money in the local community, supporting the village pub and shop in particular. So any impact on my business will effect employment in the whole community, and the businesses that support a strong community.</p>
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Cottage at Little Haven, Haverfordwest
<b>Short Description</b>	<p>A mid-terraced cottage situated in the popular coastal village of Little Haven approximately 6 miles from Haverfordwest. It comprises a hall, living area/kitchen, three bedrooms (one en-suite) and a bathroom. It sleeps a maximum of 7 people (five adults maximum as the bunk beds are less than standard size plus two children). It is booked by a variety of UK and European users from couples to multi-generational families.</p>
<b>Impact on the business of 182 threshold</b>	<p>A 182 day threshold to qualify for business rates would force us to terminate our business and sell the property. The cottage was run as a holiday business for many years prior to our purchase in 2014. Since our purchase our availability and days let have been as follows:</p>

	<table border="1"> <thead> <tr> <th>Tax year</th> <th>Days let</th> <th>Days available</th> </tr> </thead> <tbody> <tr> <td>2015-16</td> <td>82</td> <td>301</td> </tr> <tr> <td>2016-17</td> <td>82</td> <td>301</td> </tr> <tr> <td>2017-18</td> <td>100</td> <td>275</td> </tr> <tr> <td>2018-19</td> <td>114</td> <td>275</td> </tr> <tr> <td>2019-20</td> <td>121</td> <td>287</td> </tr> <tr> <td>2021-22</td> <td>108</td> <td>276</td> </tr> </tbody> </table> <p>These figures clearly demonstrate that while the property has always had sufficient days available to let to meet the threshold, it has never achieved it. Our own use of the property is last minute providing it is not let by the week before and is restricted to out of season and never in school holidays. Looking forward to the tax year 2022-23 availability is the same as in previous years but so far, apart from the peak weeks of spring bank holiday and the school summer holidays, bookings remain down on this time in previous years. Our property is priced comparably with other similar properties in the village.</p> <p>Sadly, the Welsh climate is not conducive to year-round bookings and indeed many attractions are closed out of the main season so, in a small rural-coastal location like Little Haven, there is nothing to encourage tourists out of the season. Therefore, it will be impossible to increase our bookings to meet the threshold.</p>	Tax year	Days let	Days available	2015-16	82	301	2016-17	82	301	2017-18	100	275	2018-19	114	275	2019-20	121	287	2021-22	108	276
Tax year	Days let	Days available																				
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<b>Personal impact</b>	The closure of the business would result in a 36% drop in income for me. I have a long-term health condition which restricts the type of employment I could take to replace this income stream. On current letting figures, even reverting to double Council Tax (a 100% premium as currently levied) would have a severe impact on our profits. Given the cost of maintaining an old cottage in a Conservation Area to the standard expected for holiday lets, profits would be insufficient to fund its upkeep and we would have to seriously consider the future of the business.																					
<b>Turnover</b>	<table border="1"> <tbody> <tr> <td>2019-20</td> <td>£12, 500</td> </tr> <tr> <td>2021-22</td> <td>£12,500</td> </tr> </tbody> </table>	2019-20	£12, 500	2021-22	£12,500																	
2019-20	£12, 500																					
2021-22	£12,500																					
<b>Incremental cost of Council Tax at cost</b>	£3800																					
<b>Incremental cost of Council Tax at 200%</b>	£5700																					
<b>Incremental cost of Council Tax at 300%</b>	£7600 Note: The Welsh government proposes council tax premiums not multipliers. A premium is in addition to the basic rate so a 100% premium is double the base council tax; a 300% premium is four times the base council tax. I have calculated my figures in Questions 7, 8 and 9 on this basis.																					
<b>Planning Permission restrictions</b>																						

<b>Any Other Comments</b>	<p>It is not just property owners who will be severely affected by this proposal. If a large percentage of owners are forced to sell as a result of this legislation, as they no doubt will be, there are several holiday letting businesses in Pembrokeshire whose profits will be severely affected. The cleaning company we employ has between 80 and 90 holiday lets on its books. Its business would be similarly damaged. Pubs throughout the UK were struggling to make a living even before Covid and many have closed over recent years. People tend to use pubs less when they are at home but eat out frequently when on holiday. There are two pubs and a cafe in Little Haven and a pub, bar, restaurant and three cafes in nearby Broad Haven; a large reduction in holiday lets would have a substantial effect on their profits that could not be replaced by local trade. As a result, Pembrokeshire micro-breweries and food companies would suffer, amongst the many other industries dependent on hospitality.</p>
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<b>Business Details</b>	Self Catering Cottage sleeping 11 in five bedrooms in Haverfordwest, Pembrokeshire
<b>Short Description</b>	Single detached cottage in a rural location. Only three other properties in the valley. Been trading as a Self Catering Holliday Cottage since 1996 (26 years). The property is popular with families as it is close to the coast (3 miles from Newgale) but has space for three generations to be together and relax.
<b>Impact on the business of 182 threshold</b>	<p>The cottage caters for larger family groups typically three generations, grandparents, parents and grandchildren. There is space and enough bedrooms to accommodate everyone with common facilities (lounge, dining and garden) for all to meet up and be together. These families are willing to accept not being quite on the coast or in a “characterful” location. Properties like ours are usually associated with farms (although ours isn’t) and are rarely located in villages or “characterful” locations. The facilities and space on offer are most important rather than aesthetics and family groups are happy to compromise to get them. It is available all year and we typically let for around 130 - 150 days of the year. We have tried to boost our out of season bookings many times but out of season groups are generally smaller and comprise all adults occasionally with preschool children. In this market we found ourselves competing with cottages that sleep 6 or 8 often located in a village or on the coast. These cottages reduce their rates out of season to a level we simply cannot match. It costs us the same to clean and service the house for a week or a short break when we have only 6 guests staying as it does when there are 11. Also 6 people really don’t like rattling around in a 5 bedroom house</p>



	<p>3 miles from the coast when there are so many other options. In the past to attract guests we have had to actually charge guests less than much smaller properties to make us attractive. If we do this to increase our bookings to meet the minimum 182 day threshold it would reduce our annual income and take business away from others.</p>				
<b>Personal impact</b>	<p>To keep costs down and ensure standards are kept high we maintain and manage it ourselves. We do the changeovers ourselves and launder all bedding. I am retired and this is my primary source of income providing more than 50% of my income. As noted above we will have to offer it at below cost in order to attract customers, we will be placed in direct competition with smaller properties who have lower overheads. Additional bookings out of season will also require us to take more short breaks something which are difficult for us as the house is large and the costs for a week are basically the same as for two nights. Every short break requires a full clean and new bedding but will contribute only two or three nights to the total so we will have to take proportionately more bookings to achieve the target 182 nights. I am getting older and it is unlikely I can cope with a significant increase in the number of changeovers so additional help will be needed. The impact of the change will be a small increase in income from the cottage but a disproportionately large increase in our costs. I will be worse off and we will have taken business away from smaller properties better able to accommodate smaller parties simply to hit an arbitrary occupation target.</p>				
<b>Turnover</b>	<table> <tr> <td>Gross Income 2019</td> <td>£27,027</td> </tr> <tr> <td>Gross Income 2021</td> <td>£36,185</td> </tr> </table> <p>We experienced a significant uptick in income in 2021 as families came together following the early lockdowns. Bookings in 2022 are good but not at the level experienced in 2021</p>	Gross Income 2019	£27,027	Gross Income 2021	£36,185
Gross Income 2019	£27,027				
Gross Income 2021	£36,185				
<b>Incremental cost of Council Tax at cost</b>	£3,591				
<b>Incremental cost of Council Tax at 200%</b>	£7,183				
<b>Incremental cost of Council Tax at 300%</b>	<p>£10,775</p> <p>Given the reduced income we will incur if we increase the number of bookings the cottage will cease to be viable if we incur Council Tax charges of 100% or more. I will close it down and sell the property.</p>				
<b>Planning Permission restrictions</b>					
<b>Any Other Comments</b>	<p>The cottage alone supports more than 1,650 visitor days in Pembrokeshire every year, our guests spend a significant amount in local shops and tourist venues each and every day they stay with us. These are families with children some of whom have been coming to us for years. Where will they</p>				

	<p>stay if properties like ours become unviable? Will they continue to travel to Pembrokeshire or will they go elsewhere. In the 26 years we have been in business we have provided accommodation to around 22 family groups of 11 guests a year, almost 50,000 visitor days. Do you really want to say goodbye to that level of income to Pembrokeshire?</p>
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<b>Business Details</b>	<p>Cottage in Llandovery, Furnished Holiday Let (FHL) currently on SBRR.</p>
<b>Short Description</b>	<p>Our Cottage Holidays is a 5*, single FHL, sleeping 4 people in 2 rooms, with private facilities, which was established in 2013 with the assistance of the Prince’s Initiative for Mature Enterprise (PRIME) Cymru. (The project was also briefed to HRH Prince Charles as he was also creating his own FHL cottages near the town). Based outside Llandovery, the Cottage is open 365 days a year and is an Annex to the owner’s property. In a rural location it has been constantly upgraded since opening to attract visitors. Given the rural location and lack of attractions the area achieves a 6 to 8 month tourist season.</p> <p>As owners of the Cottage we plan and deliver a key annual Community Event. Launched by Prince Charles in 2016 the event promotes local and regional sustainability, inclusivity and road safety whilst providing a free platform for the County Council to meet its engagement objectives in respect of road safety. Attracting over 3000 people each year to the area it’s a major financial boost to the economy. In order to deliver this, the Cottage has to be closed over that period as we do not have the capacity to operate the business to the standard required in addition to running the event (somewhat ironic given the aims of sustainability!).</p>
<b>Impact on the business of 182 threshold</b>	<p>If occupancy rates increase there will be graduated impacts on both the business and local economy. People’s travel and spending habits in relation to holidays is changing and it is evident that following the pandemic and as a result of the situation in Ukraine, achieving previous high levels of performance may become untenable.</p> <p>Up to 105 Days - (HMRC) Threshold – Wider Impact It is assessed that an increase to 105 days occupancy, in line with HMRC requirements and based on past performance and despite the volatility of the global situation, would have limited impact on the FHL. Basel Cottage would continue to plan and deliver the Community Event. Therefore, the following is applicable in terms of benefit to Wales:</p>

Local, Regional & National Income from Our Cottage Holidays		
FHL Guests - Local Spend	£15000 pa	£1000 pw based on 105 days occupancy
Cleaner	£2500 pa	
Gardener / Handyman	£4000 pa	
Arborist / Hedge cutting	£750 pa	Incl. Annual safety inspections & storm dam:
Business Insurance	£700 pa	
Chimney Sweep	£100 pa	Safety inspection included
Electricians	£200 pa	PAT & Additional testing/ certification
Boiler / Plumbing	£300 pa	Annual Service (less parts) and certification
Welcome pack	£200 pa	Local products based on 15 weeks occupanc
Community Event "value"	£125,000	Local / Regional Sustainability
<b>TOTAL BENEFIT TO WALES</b>	<b>£149,000</b>	(not including HMRC gains from taxation)

If the required occupancy level increases in excess of 105 days, there would be a gradual cessation of additional activities including: Volunteer Mentor with PRIME Cymru, withdrawal of support for a Regional Mental Health Charity and its Motorcycle Club and project (who are partners in the Community Event) along with other voluntary activities. This would enable greater focus on the FHL.

182 Days - Senedd proposed Threshold – Wider Impact. (It is worthy of note that 182 days equates to between 73% to 98% of the available tourist season which is 6-8 months). If the “days let” increase to anywhere near the 182 threshold and the global situation continues to deteriorate, then it is probable that we would have to consider whether to cease trading and re-absorb the Annex into the main house and returned to a single dwelling. The property would NOT be available for release on the open market. The additional anxiety at our time of life to sustain such a high occupancy with the ever-present threat of paying any profit (along with a substantial part of our pension) to simply pay council tax would render the business totally unviable and would be detrimental to our future financial situation and health to even try to retain it. The immediate impact would be a net loss to the economy of circa £140,000 per annum as well as the potential for increased reliance on the state. The cost to the local County Council to plan and deliver their own event in order to “reach” in excess of 3000 people has not been quantified / costed, but would probably take several different events to achieve this level of success.

**Personal impact**

Established to sustain us following retirement from the Armed Forces and NHS our FHL was developed with support from PRIME Cymru, Welsh Assembly and EU and has won numerous National and Regional Awards & attracts guests from across Europe. Open all year, the cottage has achieved 182 days in the past. However, in light of a change in perception of Wales as a possible holiday venue for UK visitors, coupled with the economic downturn, bookings are

	visibly down on pre-covid levels and this adds immense stress to managing the business. We all struggle to make a living in a post-Brexit, post-Pandemic Europe within a deteriorating economic climate. However, we are dismayed at the lack of compassion and awareness by the Welsh Government and certain AMs regarding the negative impacts that this ill-considered policy change will have on many hard working people (many over 50's and Veterans, who already find it challenging to adapt to civilian life!). Words and expressions like "not being heard", "anxious", "depressed" and even "giving up" perhaps indicate how we feel. If, despite working even harder to attract people out of season to Wales, we are faced with high levels of council tax then we will not continue to work simply to pay this tax and will cease trading. We regard the proposed legislation as a "kick in the teeth" for people who have worked all their lives and add value to their Country.
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	A 3 bedroom end terrace opposite our smallholding in Llithfaen Gwynedd.
<b>Short Description</b>	An end terrace ex quarry cottage and our former home. We were unable to sell it when we purchased the smallholding in 2006 ... No one local wants to live up here on the side of a mountain with no school or parking and no back garden! Tried AST to local people but after having it trashed by three tenants in a row we turned to holiday letting in 2016. It is now our main source of income and supports three of us. Now aged 60 and 67 we hope to retire there when no longer able to cope on the smallholding and eventually leave it to our son who was born in it.
<b>Impact on the business of 182 threshold</b>	In this non honeypot traditional Welsh village, achieving 182 days would be virtually impossible. Most of our bookings are between March and September, with a few half term and mini breaks if we are lucky. The cottage is marketed all year and available for let every day. The reality is that tourists prefer the Summer. The demand is just not there out of season . 145 nights is more realistic. Treating genuine FHL businesses owned by local people like 2nd homes is very unfair. Ours provides income to support this local farming family as well as local trades. We use window cleaners

	gardeners laundress plumbers electricians etc.....and use local independent shops
<b>Personal impact</b>	Personally, such a change would create untold stress and worry. I am already struggling with anxiety and depression since Covid and nearly losing the farm business. We really could not afford to run the cottage profitably if a punitive 300% Council Tax was imposed. Matching the current VOA business rates qualification thresholds is much fairer and achievable. You will be having to rehouse this local family if these punitive and ill thought out provisions go through! We will be bankrupt. We have tried to diversify and use our assets wisely to pay our own way and now face this.
<b>Turnover</b>	For tax year 2019/20 was £15708 For tax year 2021/22 was £15793
<b>Incremental cost of Council Tax at cost</b>	£1460
<b>Incremental cost of Council Tax at 200%</b>	£2920
<b>Incremental cost of Council Tax at 300%</b>	£4380
<b>Planning Permission restrictions</b>	Currently no restrictions apply and we are Business rated and in SBRR
<b>Any Other Comments</b>	

<b>Business Details</b>	a single cottage, rurally situated in North Pembrokeshire with far reaching views over the rolling countryside towards Ceredigion and the sea of Cardigan Bay
<b>Short Description</b>	We have been running the cottage as a holiday let for 11 years under the umbrella of Our Farm and Cottages.  We bought a run-down Farm in 1988 and established a successful, award-winning business. When we sold the business in January 2022 we kept the cottage that was one mile off site from the Farm. It is situated on the site of our home and we have offered holidays here successfully over the last 11 years as part of the Farm and all of the beautiful facilities there.
<b>Impact on the business of 182 threshold</b>	This 182 day threshold is likely to have a serious impact on hundreds of small holiday rentals and families. Rural areas of Wales have few jobs and lower wages than many other areas of the UK, with tourism and farming being the biggest employers. For many their short term holiday rental is the difference between making ends meet and providing for their families or not. Poverty brings catastrophic consequences. Pembrokeshire is a very popular tourism area and the beaches are flooded in holiday season. However out of season it can be hard to attract the holidaymakers so a large proportion of these rentals are not likely to achieve a full 26 weeks of bookings consistently. The risk of a Council

	<p>Tax invoice for 300% or even 200% will have a detrimental effect on tourism here. This may lead to both Pembrokeshire and Wales having reduced accommodation available, therefore income may reduce for attractions, local businesses and hospitality venues leading to greater need for support from the Welsh Govt.</p> <p>How does the Government plan to follow up all those not declaring their holiday rental but trading through Air bnb and other OTA's?</p>
<b>Personal impact</b>	<p>Personally speaking we are currently setting up a single cottage holiday let which was a part of the farm and cottages until we recently sold the business. We know we are unlikely to achieve 182 days in the first year or two so we are already feeling demoralised to continue. The income from the cottage is vital for us as it forms a sizable part of our retirement income and financial planning. If the 182 days threshold is introduced with forfeits of 300% rates we will need to think seriously about our long term future and whether we sell our home and cottage. (This is such a shame when we have owned and run a successful business with 10 cottages for 33 years, bringing it through Covid-19, offering employment to locals and their families and bringing a considerable amount of income into the area over this time.)</p>
<b>Turnover</b>	<p>The recent turnover in the cottage was £42,337 in 2019-2020, and £45,771 in 2021-2022. Please note these figures relate to when the cottage was a part of the bigger Farm &amp; Cottages with access to a variety of child friendly facilities and an indoor swimming pool. We will therefore be charging substantially lower prices.</p>
<b>Incremental cost of Council Tax at cost</b>	£1926
<b>Incremental cost of Council Tax at 200%</b>	£3852
<b>Incremental cost of Council Tax at 300%</b>	£5778
<b>Planning Permission restrictions</b>	<p>The Rateable Value for for 2022/23 is <math>£3600 \times 0.535 = £</math> however currently it receives 100% small business rate relief under the 70 day threshold.</p> <p>These present unaffordable percentages to pay if the 182 threshold is not met..</p> <p>We agree 70 day threshold could be increased but we suggest it is raised to be in line with the current England threshold.</p>
<b>Any Other Comments</b>	<p>There needs to be careful consideration given to the balance between the threshold for the minimum days let vs the percentages charged as a forfeit for not achieving the threshold.</p> <p>We are not aware that we are restricted to short term rentals, but we would not run it as a long term let.</p>

<b>Business Details</b>	A single holiday cottage , Cresselly, Pembrokeshire
<b>Short Description</b>	This is a one bedroomed annexe adjacent to our permanent house where we have lived for 40 years. We used the building/annexe ourselves as additional living accommodation but after retirement applied for change of use and began to let out during the summer months. We have been operating for 5 years.
<b>Impact on the business of 182 threshold</b>	We have only ever intended to let out in the summer. These proposals would mean that we would no longer be eligible for small business rate relief. We do not want to rent for six months and there is no regular demand. Our cottage is small and has no effective year round heating.
<b>Personal impact</b>	If this proposal is introduced we would cease operating as the cost of council tax would make it completely non- viable. We would return the annexe to personal domestic use.
<b>Turnover</b>	Annual rentals for between 80 and 100 days on average generate about £5-6k a year with net profit of £3-4 k.
<b>Incremental cost of Council Tax at cost</b>	£1250
<b>Incremental cost of Council Tax at 200%</b>	£2500
<b>Incremental cost of Council Tax at 300%</b>	£3750
<b>Planning Permission restrictions</b>	Our planning permission is for holiday let only. The cottage is not a separate property. It could not be sold or rented permanently and these proposals would not generate any further local access to residential accommodation.
<b>Any Other Comments</b>	The only impact would be to curtail our small business interest and reduce the capacity of Pembrokeshire to offer a quality short term summer holiday cottage. We urge you to abandon these proposals as they will not deliver their intended objective and in fact will damage much existing business activity.

<b>Business Details</b>	Part of my property, where I live and I am Welsh, born in Cardiff.
<b>Short Description</b>	It is a 3 bed detached s/c cottage in rural mid Wales, trading for 5 years.
<b>Impact on the business of 182 threshold</b>	It is booked, on average for 150 days per annum. I will therefore not be able to have the 100% rebate for Business Rates, and will need to pay Council tax. This will just about wipe out the profit from the business, as outgoings (oil fuel, repairs and maintenance of the property) are high. The impact of the proposed 182 days let will be that I will close the business. As it is part of my property, it will not be available for another use. Another local S/C let has already closed, with subsequent loss of tourist income for the area.
<b>Personal impact</b>	I am not yet of retirement age, and have fibromyalgia and could not work a full time job. My husband is working, but we need the additional income to live here in rural Wales. I



	will need to look for p/t work, or possibly claim Universal Credit.
<b>Turnover</b>	In 2019, the turnover for The Byre was £12,000 (2018/19) and £16,000 for 2019/20, and for 2020/21 was drastically reduced due to Covid.
<b>Incremental cost of Council Tax at cost</b>	£1498
<b>Incremental cost of Council Tax at 200%</b>	£2996
<b>Incremental cost of Council Tax at 300%</b>	£4494
<b>Planning Permission restrictions</b>	There are no planning restrictions, but harsh weather conditions prevents opening in the Winter, and we use this time to decorate and undergo maintenance.
<b>Any Other Comments</b>	Not part of your questionnaire, but, I would like to make the point that small rural s/c holiday lets are very dependant on the economics of the holidaying population. Massive cost of living rises this year have already shown that in my area, there is a reluctance to book, until peoples see whether they can afford a holiday/weekend away. I doubt this will be taken into account in the WG's new lettings requirements.

<b>Business Details</b>	a stand alone 3 bedroom holiday cottage with a lovely garden in a rural village, 5 miles from the coast in West Wales. We have been trading for 4 years. Llandysul, Ceredigion
<b>Short Description</b>	We have run our proeprty successfully for 4 years and it is open all year for holiday letting. The proposed increase threshold from 70 days to 182 days will be very hard to meet. Although we currently have bookings for nearly every month we are only booked for 120 days this year. In 2019 with no external factors affecting bookings we were let for 140 days. Each trading year is different with events outside our control, the rising cost of living affecting peoples holiday choices and the possibility of the Welsh Government changing the school term year, all potentially having an effect on the amount of days let per year.
<b>Impact on the business of 182 threshold</b>	Having to achieve the proposed 182 days of days let before being able to claim for the Small Business Rate Relief would mean that in a normal trading year this would not be possible, then not qualifying and having to pay the new local council tax would mean the cost of running he cottage would be disproportionate to the money we earn and we would have to close. We came to Wales to live and to run a holiday let. Having found the cottage we have worked hard to improve the property, keeping up a high standard of repair etc and carried out all necessary requirements needed to make the

	<p>cottage legally safe. The cottage is very well equipped and we hope we have thought of everything guests will need to have a great comfortable stay. We have invested a lot of time and money into something we really want to work and have great feedback from our guests which is the reward. We have many books, brochures and leaflets in the cottage all promoting the local area and businesses. We include local walks and places we have been in our suggestions to visit. Our guests eat and shop locally and therefore support the local economy. We also employ many local trades people for repairs and maintenance. We also use a local advertising agency for bookings who have recently expanded. We have noticed a vast improvement in the upgrading of local businesses, towns and properties in recent years due the rise of tourism in our area.</p>
<b>Personal impact</b>	<p>We are passionate about our small business it is something we have wanted to do for along time. We have had many ups and downs since living in Wales but always have been consistent in wanting the cottage to work for us. It would be very upsetting to be forced to give it all up if we were not able to meet the new criteria the Government is proposing.</p>
<b>Turnover</b>	<p>Our turnover in 2019 to 2020 was £16000 Our turnover in 2020 to 2021 was £13000</p>
<b>Incremental cost of Council Tax at cost</b>	£2191
<b>Incremental cost of Council Tax at 200%</b>	£4382
<b>Incremental cost of Council Tax at 300%</b>	£6537
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Barn conversion next to our house on our rural smallholding. Lampeter
<b>Short Description</b>	<p>Moved here in 2016, renovated cottage and started letting it in 2017. Property, consisting of Welsh longhouse, barn conversion, outbuildings and 10 acres of neglected land, had been on the market for several years, in poor condition requiring extensive renovation. Would not have been purchased by young first-time buyer. Holiday let and house on same postcode, so not a second home.</p>
<b>Impact on the business of 182 threshold</b>	<p>Impact on my business has the potential to be catastrophic, very rural location, on top of a very windy Welsh hill, not conducive to late Autumn, Winter, or early Spring occupation. Comply with HMRC FHL requirements, these numbers fit well with the Welsh holiday season. Shops and attractions close after October half term to February half term thereby reducing tourist interest. The property is located at the top of a steep bridleway, through woodland, can be treacherous in poor weather conditions, putting</p>

	<p>guests unfamiliar to using the track at risk. Costs of running a very old building during the winter months is prohibitive, other than keeping it ticking over to prevent any frost damage. We strive to have as little impact on the environment as possible, increasing occupation means we will be party to damage to the environment by the increase in road pollution, infrastructure wear and tear, waste disposal and use of energy. We have an electric car and offer EV charging, to date no one has arrived by EV or even plugin hybrid.</p>
<b>Personal impact</b>	<p>The reason we chose to buy a property with the potential of a holiday let was to help bridge the gap in my pension caused when women born in the 1950s were impacted severely by government changes to retirement dates with insufficient notice. Being able to work within the curtilage of our own property is important as my partner has a serious heart condition and had a TIA. As indicated by the pension situation I am in my late 60s, the proposed government changes would mean I would have to work more days for more weeks to keep the cottage running as I do all the cleaning, washing, ironing, gardening etc., not an ideal way to enjoy my retirement. The stress of not knowing until the end of the year if the required occupation numbers have been reached will be immense, in turn this will impact on my relationship and ability to support my partner. We struggled to run the business during in 2021 as the risk of bringing Covid into our home was extremely worrying, but we had to still aim for the occupation required for FHL accounts and SBRR.</p>
<b>Turnover</b>	Turnover 2019 £13,022 and Turnover 2021 £9,835.75
<b>Incremental cost of Council Tax at cost</b>	£1872
<b>Incremental cost of Council Tax at 200%</b>	£4494
<b>Incremental cost of Council Tax at 300%</b>	£5992
<b>Planning Permission restrictions</b>	The cottage cannot be sold separately as it forms part of our smallholding.
<b>Any Other Comments</b>	

<b>Business Details</b>	Apartment 1 bedroom, dog friendly self-catering for two people, Coastal Path out of village location.
<b>Short Description</b>	We've been trading for about five years.
<b>Impact on the business of 182 threshold</b>	In brief the potential outcome for the business is closure. Although we have maintained our prices at 2021 levels, we are now in April and have only 77 days booked with most of the main summer weeks already booked so its not likely to rise very much from now on. It is uneconomical for us to let part weeks due to cleaning and energy costs. Energy costs

	<p>are obviously going to rise even more now and inflation will have an impact on cleaning and all other costs. We get few bookings prior to April or after September. To get bookings in these winter months we would need to cut prices so low that it would not be profitable. We need to face the simple fact that we are in the UK and in our case in Wales, notably wetter than most parts. We cannot control the climate and we cannot operate at a loss. This year to date we have had only one booking for four days prior to April and are still empty until May 9th. It is inconceivable that we could bridge the gap between our current days booked to 182 days so we would face even greater profitability problems if we incur council tax at any level. This property was originally a single hereditament with the annexe regarded as part of the main house and if the new regulations came into force we would need to seriously consider stopping trading and revert the house back to a single larger dwelling by removing the kitchen facilities in the annexe. If we did this then there will be no benefit to the rating authority but significant local trade income will be lost when we don't have guests.</p>
<b>Personal impact</b>	<p>On a personal basis as a retired couple this income is not significant personally so that this makes closure even more likely if too many obstacles are put in the way. Accounts of a business only show the financial costs. They don't show the impact running a business has on your own life, how much of your personal time goes into it, how much worry there can be sometimes, dealing with damages or ill-mannered guests etc. even if infrequent. So unless there is adequate return on the business this adds to the likelihood of us closing down. I feel sorry for those who really need the income as they may need to continue trading but simply have less to live on.</p>
<b>Turnover</b>	<p>Turnover 2019 £9,000 (161 days booked) 2021 £11,000 (151 days booked).</p>
<b>Incremental cost of Council Tax at cost</b>	<p>£1110</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>£2220</p>
<b>Incremental cost of Council Tax at 300%</b>	<p>£3330</p>
<b>Planning Permission restrictions</b>	<p>I don't believe we are restricted by planning to short term letting but long term letting is simply not something we would consider. We have had too much trouble with tenants when we did this some years ago. As I have mentioned above we would simply have to convert the original main house and annexe back to one single house as it was before we equipped the annexe for letting. So we would incur greater council tax on the main house but less than paying council tax on two properties even at the single council tax rate. In summary the impact of these changes will result in</p>

	less visitor income for local businesses and less personal spending by ourselves in the area with local businesses.
<b>Any Other Comments</b>	
<b>Business Details</b>	A cluster of 4 self catering cottages in a village outside Newtown in Powys, Mid Wales.
<b>Short Description</b>	The units are part of a rural Victorian property and were previously old barns and a coach house in derelict condition. They were renovated in 2008 to create a holiday business and have 'holiday use' only planning consent so cannot be used for residential purposes. All services are shared and the proximity of the cottages to the main house means that they cannot be sold separately. The business has been profitable it employs 2 people and uses external services such as laundry.
<b>Impact on the business of 182 threshold</b>	<p>For the last 4 years our holiday business has been run in association with charity Dal Dy Dir which provides respite breaks and holidays to families with disabilities such as autism. Due to the nature of the charity it is not possible to mix regular holiday guests with supported families with disabilities and special needs so it is a specialist and limited market. Furthermore the support Dal Dy Dir provides is challenging and can be exhausting, often at weekends, so qualified staff can be hard to engage. Our cottages still remain 'holiday cottages' as Dal Dy Dir's clients prefer to a 'normal' holiday place, not a care home !</p> <p>Occupancy levels are not meaningful to a business like this. A significant proportion of the charity's income comes from the care services they provide such as two to one support, 24 hour care and animal therapy from their goats and sheep. The occupancy based requirement of 182 days does not seem to make any sense for this business or indeed any holiday business that also provides chargeable services.</p> <p>If we set aside the months from November to February as very low season, unsuitable for respite breaks (care staff are not available to work Christmas or New Year), then the potential holiday period is reduced to 245 days so 182 represents 75% occupancy march to October. Mid Wales is not the kind of location which would attract sufficient guests to achieve such a high occupancy.</p>
<b>Personal impact</b>	
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	My Rateable Value is 5900, but charities don't qualify for SBRR so they are paying 80% of this, which in itself seems very unfair when a commercial 'small business' pays 0.
<b>Incremental cost of Council Tax at 200%</b>	Imposing council tax of around £5200 on the cottages would hit the charity very hard and a 100% premium rate taking this to £10,400 would be ruinous.

<b>Incremental cost of Council Tax at 300%</b>	If the charity were forced out and the cottages returned to me as 'second homes' at 200% or up to 400% council tax then I would be forced to shut down the business and dismantle everything I have built and invested in. This would not help the housing crises.
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	I believe that the criteria for assessing 'business status' should be financial (does it pay someone a salary at minimum wage) and not occupancy based. A 'business' letting 182 nights at £10 a night, generating just £1820 would qualify, but a business letting 180 nights at £200 a night generating £36,000 would not, It does not make sense, its equivalent to setting the trading status for a shop based on the number of customers. Woolworths would have qualified but Gucci would not, and we know what happened to Woolworths. Cluster farms and multi-property businesses are not second homes and need to be exempted from this legislation if they are to survive.

<b>Business Details</b>	Converted farm buildings, at Stanwell, Llanteg.
<b>Short Description</b>	We started our business in 1985, when we were granted planning permission to convert a disused milking parlour into two units of self catering holiday accommodation for use for 9 months of the year, excluding the months of November, January and February. We have run this business ever since, letting anything from 17 to 30 weeks (just once - the weather was superb the year before!) and it has been an integral part of our income throughout this time. We were advised to change the rating to business standard, by a member of staff at VOA many years ago, indeed he suggested that we were not complying by having them on domestic rates at that time. We were pleased when the small business rate relief came about and, apart from the first Covid Grant in 2020, this has been the only financial help we believe we have ever received or requested. We have always made our properties available for at least 30 weeks of the year during all this time, as we know through experience (over 30 years) that there is very limited requirement for smaller properties such as ours in the countryside, outside of the main season. This has worked well for us and all our returning visitors.
<b>Impact on the business of 182 threshold</b>	However, the proposal that we should now be open for minimum 36 weeks and occupied for minimum 26 weeks would be a target that we would almost certainly not be able to meet and this has caused much distress, especially now that we are retired and rely on this small income even more. We fully understand that this has all come about because of the second home issue, which is a serious one, particularly in places like Tenby, Amroth and many of the other villages that are now devoid of local people and available long term letting or property for locals to live in. However, to penalise

	small businesses like ours, where the units are not suitable or designed for long term use, seems a bit draconian to say the least.
<b>Personal impact</b>	
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	Is it possible that business premises like ours, could be classified differently, similar to, say, caravan sites where, we are sure they are not dictated to, as to how many lettings they must take to remain a caravan site?

<b>Business Details</b>	Our cottage sleeps up to 10 and is just outside the beautiful and historic village of Nevern in the heart of the Pembrokeshire Coast National Park
<b>Short Description</b>	It's in a very rural location. My family have owned it for many hundreds of years. Employment circumstances have dictated that we haven't been able to live there all of the time. My grandmother started letting it as a holiday cottage in the 1930s. We have let it at all times when we cannot be there since ownership was passed to us in the 1980s. The grounds are extensive and require much maintenance so we need to occupy the cottage ourselves for several weeks each year. It lets well in the summer and for school holidays and half terms. At other times it can be less easy to let. If all Welsh holiday cottages had to achieve 26 weeks of lets each year there would be a price war during the winter and shoulder months, quite possibly forcing it to be let at a loss which is unsustainable. On top of this, paying an inflated Council Tax would more than remove our profit, most of which we reinvest locally in improvements, caretaking, cleaning, laundry, redecoration, insurance, repairs, agents' commission etc. Our guests also spend money in local shops, pubs, restaurants and attractions.
<b>Impact on the business of 182 threshold</b>	If the 182 day threshold were to be implemented and it had to pay inflated Council Tax, I suspect that we will stop letting it. This would remove all the costs and hassle of keeping it up to the high standards expected by guests. It would also much reduce the inevitable wear and tear. We would just use it for ourselves. It will therefore be empty for much of the year and the associated local expenditure which is so important to the local community would diminish.
<b>Personal impact</b>	
<b>Turnover</b>	2019 turnover was £19,445. 2021 turnover was £32,723.



<b>Incremental cost of Council Tax at cost</b>	£1900
<b>Incremental cost of Council Tax at 200%</b>	£3816
<b>Incremental cost of Council Tax at 300%</b>	£5700
<b>Planning Permission restrictions</b>	It has no planning restrictions.
<b>Any Other Comments</b>	

<b>Business Details</b>	A single 2 bedroom sleeps 4 holiday cottage, St Ishmaels, Pembrokeshire.
<b>Short Description</b>	A rural/ coastal location that has been trading for just over 2.5 years.
<b>Impact on the business of 182 threshold</b>	The impact on our business of the 182 night threshold is that it will place a massive uncertainty on the ongoing viability of our business. We achieved bookings of 192 nights in tax year 2021/22 but this was an exceptional year boosted by the effect of Covid restrictions on overseas travel meaning domestic bookings were abnormally high. In a normal year we wouldn't reach the threshold even if we opened 365 days of the year. The season in our part of Pembrokeshire is from Easter to the end of September plus the Christmas/New Year holiday. The proposed threshold would mean we would have to be pretty much full booked for the whole season which is unrealistic as we have no control over bookings other than setting price/availability and providing a consistently quality product. Outside the main season most attractions and the majority of local pubs and restaurants in our vicinity close meaning the area is of little interest to potential guests therefore obtaining bookings is unrealistic apart from the odd short break. Heating/lighting costs are also higher out of season whilst the price we are able to charge is lower, so this is not cost effective.
<b>Personal impact</b>	The impact on us personally will be increased stress as the proposed 182 day threshold means we will face the worry of failing to meet it and as a result having to pay a 300% council tax penalty which will all but wipe out any profit we make, drastically reducing our income and preventing our ability to reinvest in the business. We cannot think of any other business that would face such a punitive penalty and find it appalling that our Government is contemplating this type of measure when it should be seeking to promote business and the economy. If the proposed thresholds are introduced, we will in all probability close our business and sell the property as for the sake of our health and sanity we cannot operate in such uncertain conditions having both taken early retirement from stressful jobs. We have consulted local Estate Agents who advise demand for property remains exceptionally high

	<p>from clients looking to relocate rather than buy second homes or operate properties as holiday businesses so it is unlikely councils will receive the perceived council tax dividend. Such properties will in all probability also remain beyond the reach of local first-time buyers. Our business also helps support the local service industry as we use the services of a cleaner, gardener, handyman, chimney sweep, window cleaner, plumber, electrician and a laundry etc many of whom would struggle to operate profitably without self-catering businesses such as ours. The local economy which relies a lot on tourism will be decimated by this ill-conceived measure.</p>
<b>Turnover</b>	<p>Our turnover in tax year 2021/22 was £15,908. We only traded from September onwards in 2019/20, having purchased the property in May then renovating it. We missed the main season and as a result only turned over £1,109.</p>
<b>Incremental cost of Council Tax at cost</b>	£3122
<b>Incremental cost of Council Tax at 200%</b>	£4682
<b>Incremental cost of Council Tax at 300%</b>	£6243
<b>Planning Permission restrictions</b>	<p>We are not limited by planning permission to operate as a short-term letting and no restrictions apply.</p>
<b>Any Other Comments</b>	

<b>Business Details</b>	<p>Originally four one bed roomed units. Two in the grounds of our home in a rural location near Barmouth. One in Barmouth and one in Dolgellau (currently sold subject to contract). Leaving us with three.</p>
<b>Short Description</b>	<p>We purchased the properties 10 years ago. A private home with Self-catering Units. Our property in Barmouth was a second home and empty most of the year. And the one in Dolgellau was a Self-Catering Holiday Unit already on the business rates register.</p>
<b>Impact on the business of 182 threshold</b>	<p>I have checked back over the years we've been trading and the only year that three of my properties met the 182 criteria was 2021 (A bumper year that was not the norm and will be difficult to replicate in the future). Only one of my properties in Barmouth reached 182 threshold in 2018. None of them have on any other year.</p> <p>Our business is open all year. We do not use the properties for personal use. They are solely business premises. Our concern is that if we cannot meet the 182 days met we could be looking at council tax increases. On top of the massive increase in energy prices for our heating and lighting. The increased costs of laundry and cleaning. Even the costs of our welcome packs have gone up significantly.</p>

	<p>As one bedroomed units, there is a ceiling price we can charge. We do not have the huge increase in weekly rates during the summer like some other business do.</p> <p>We take as many bookings as we can get but during low season this is usually only weekends or short breaks, largely because of the weather.</p>
<b>Personal impact</b>	<p>We don't make a lot of profit. We do the cleaning ourselves; I do all of the laundry, use trades during the winter when needed, but try to complete as much of the maintenance ourselves. This keeps our costs down. Making the business a successful way of paying our bills. This is how we earn our living.</p> <p>I fear with additional bills for council tax at premium rates we could not only lose our business. But we could end up in significant debt. I believe non-payment of council tax is a criminal offence. I'm genuinely worried about this most of the time now. I feel powerless, and it's effecting my mood. I'm worried if we increase our prices, we will get fewer bookings i.e. less days let.</p> <p>I'm afraid of what the future will hold for us personally. Knowing that we will not be able to meet the payments if we are placed on council tax with any premium. I don't want to sell because this is our home. But because of the 2nd home tax increase, selling would be difficult. (we've had one, fall through because of this already).</p> <p>It sickens me to think of the time and effort we have put into our business, building it up over the years, building our reputation, our brand, hundreds of 5-star reviews across various platforms.</p> <p>A lot of our business is repeat business. Some come back a few times a year. We've invested heavily in the area.</p> <p>I have taken on a part time job to try to substitute my income, but it will be nowhere near enough. Working in a small café that also thrives on the visitors to Barmouth. One of many small businesses and their staff that rely heavily on the visitors that stay in properties like mine. (I may end up losing my job too).</p>
<b>Turnover</b>	Our turnover in 2019/20 was 27,600.00 and 2021/22 is 31,600.00.
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £9000 (for 3) or £12000 (for 4, if my sale falls through again)
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £13500 (for 3) or £18000 (for 4)
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £18000 (for 3) or £24000 (for 4) I currently get SBRR on two of my properties (two in one hereditament) and pay rates £900.00 on the other one. Plus, three commercial waste contracts.
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Large single detached house with grounds, ideal for family vacations (sleeps up to 12 plus one baby) in Colwyn Bay, Conwy.
<b>Short Description</b>	Uninterrupted rural, mountain and sea views plus outdoor swimming pool. The property has been trading as a full-time holiday let for 7 years, the last 2 in our ownership.
<b>Impact on the business of 182 threshold</b>	<p>We cannot stress enough the impact that the 182-night threshold will have on our business, to the extent that it has the potential to turn a thriving business into a loss-making activity.</p> <p>This unrealistically high threshold is extremely difficult to meet given the seasonality of the holiday market and the fact that our focus is extended family holidays. These almost always include school-age children, which means that the main letting periods are school holidays plus weekend breaks out of season.</p> <p>To put this in context, there are a total of 13 full weeks of school holidays each year, giving 91 days. With 39 school weeks, outside school holidays this leaves only weekends when children can stay. In total, this comes to 169 nights that families with school-age children could possibly book to stay, even if a holiday let property was so successful that every single non-school night was fully booked. To get to the minimum 182 nights would require an additional 13 nights stay, mid-week, out of season, with no possibility of bringing children.</p> <p>For this reason, reaching the 182-night threshold is essentially impossible. Moreover, even if we did manage this one year, we would be at serious risk of failing to hit that number in a subsequent one and so having the potential prospect of an unplanned tax claw-back of very many thousands of pounds.</p> <p>The most likely scenario for us is therefore that despite operating at full capacity with an activity that we see as most clearly a full-time business (as it is by the rules of HMRC), we would end up subject to premium Council Tax payments. These would be impossible to absorb in our current pricing, so would need to be added to the price of the holiday. Should this end up being at a 300% premium, the net effect would be that holiday guests would need to pay around £600 per week more than at present, assuming that there was no effect of bookings. In our view it is completely unrealistic to assume there would be no impact of raising prices on guest bookings, and the inevitable consequence would therefore be reduced guest numbers. A 15% reduction in guest bookings would result in each having to pay £700 per week more than at present, just to cover the Council Tax. Such a reduction in guest bookings, which we believe is an entirely reasonable expectation because of the 182-night</p>

	<p>threshold, would also greatly reduce our profits. It is very important for politicians to realise that a (say) 15% reduction in booking income does not equate to a 15% reduction in profits. We currently work on about a 15% profit margin relative to turnover. Such a reduction in booking income would therefore completely remove ALL profit from our activity, rendering it uneconomic to continue.</p> <p>Of course, it would be possible to suggest a different scenario, where we keep our prices the same and absorb the additional Council Tax costs. This way there would be no impact on guest numbers. The net effect, however, is the same. Should the Council Tax premium be 300%, then the cost of that would be the equivalent of once more removing ALL profit from our business.</p> <p>Our holiday let property is one of the largest in the North Wales area and attracts a considerable number of tourists whose spend contributes to the local economy. Should we cease trading there would be consequential losses to local restaurants, pubs and other leisure activities. In addition, we support a large number of local services: we have 2 housekeeping staff, a maintenance man, make extensive use of laundry services and have regular professional garden maintenance. The people involved in each of these activities would experience significantly reduced income if we ceased trading.</p> <p>It is worth noting that our holiday let business, should it need to be sold as a result of this rule change making holiday letting uneconomic, is of a size and scale that under no circumstances make it an addition to the pool of affordable housing. The most likely purchaser would be an affluent second homeowner who had no intention of using it as a holiday let (as such activity would no longer be financially viable). The net effect would therefore be to convert a thriving business that supports the local economy and brings significant numbers of tourists into the area, into a rarely occupied second home for rich outsiders to spend the odd weekend. Is this the consequence that politicians desire?</p>
<b>Personal impact</b>	<p>There is absolutely no point in running a holiday let business (or indeed, any form of business) if there is no profit. Should this happen, we will need to divest. There would be consequences for our personal income, as this would be reduced, and also likely losses from the need to sell the holiday property quickly in order to offset the consequential loss that trading under these circumstances would entail.</p>
<b>Turnover</b>	<p>Turnover in 2019-20 was before we purchased the property, but we understand it was around £50,000. Turnover in 2020-21 was dramatically affected by Covid, and even with government subsidies was just £40,000, which means we made a considerable loss. The turnover in 2021-22 was £79,000, even though we still had to refund £9,000 of bookings due to lockdown. If we are able to continue, which</p>

	the proposed 182-night rule significantly threatens, our turnover will exceed £85,000 during 2022-23 and so we will need to be VAT registered.
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £4,507.86 - £3,005.24 basic plus 50% premium (Conwy Council)
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £9,015.72
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £12,020.96
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	a small cottage in Ceredigion as a holiday let. It has only been used as a holiday let for over 20 years. I do not stay in it, and nor do my family.
<b>Short Description</b>	
<b>Impact on the business of 182 threshold</b>	<p>The annual profit is around £5000 in a good year. Over Covid we lost out hugely. I am able to let the cottage for about 120 days a year. If I had to meet the 180 day threshold then the combined near total lack of guests outside the visitor season and the need to heat the cottage would make this uneconomical to achieve.</p> <p>As a local employer I employ a part time cleaner, handy man and gardener. The cottage attracts guests who contribute considerably to the local economy.</p> <p>If I had to pay any council tax I would decide that there was no longer any hope of significant profit from the cottage and I would stop using it as a holiday let.</p> <p>Please kindly recognise the contribution my small business makes to the local economy, and how much this would be impacted if it became necessary to pay council tax.</p>
<b>Personal impact</b>	
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	1 bedroom let in Beddgelert Gwynedd.
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<b>Short Description</b>	It is a 1 bedroom Let, previously a garage ,which is next to my full time residence.
<b>Impact on the business of 182 threshold</b>	This coming year in particular I have a lot of short breaks which reduces my nights booked by a lot but still means I have most weeks with some sort of occupancy. If this trend continues then I will struggle to even meet the 182 occupancy and please note ....I am in a prime tourist spot. If I fail to book the required days , then Gwynedd council are requiring a 300% charge on my property as it would be deemed as not “a Business”. Some £4000 a year. Please explain to me how a property with ONLY furnished holiday let planning , one which can't be used as a long let or indeed a second home..... I live next door, can be charged accordingly.
<b>Personal impact</b>	
<b>Turnover</b>	I average around £10000 per year income . This is part of my family income as my husband is unable to work for spells due to crippling eczema.
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	<ul style="list-style-type: none"> <li>*It can only be a FHL</li> <li>*28 days maximum let to same people,</li> <li>*Unable to let between 15th Jan to 1st March in any year.</li> </ul> <p>This means that I have a 6 week period each year (42 days) where I am unable to let.</p> <p>If this 42 days is on top of the 182 days actual letting that has been proposed under the new regulations , then not only will this be unfair but also discriminatory as I am only abiding by planning conditions .</p>
<b>Any Other Comments</b>	I do think that any FHL that is on business rates should be available for letting 365 days per year minus any planning restrictions but the 182 days occupancy is too high. The years ahead with all the crippling living costs that people face will mean that we are likely to see much reduced bookings and a lot won't be able to meet these new proposed changes.

<b>Business Details</b>	2 holiday cottages on a smallholding, 3 miles from New Quay , Pentre'r Bryn Ceredigion
<b>Short Description</b>	The original cottage is an annex to the main house, sharing an initial entrance via a joint conservatory and has been trading since 2012. We bought the smallholding in 2014 and were told the cottage had holiday let status. We had planning on a range of barns and part of it was converted to a second holiday cottage in 2017. This is required to close 6 weeks each year.



<b>Impact on the business of 182 threshold</b>	<p>The smallholding and holiday let conversion has taken all our savings and this business is now our pension pot. The cottages have a let period of 80-110 on 1 (the hot tub added on recommendation by our agents has made no difference to this cottage), and the second 100-125. This means that both cottages would be subject to council tax under the regulations and the cost at 300% could be around 50% of the income of the cottages. This is before any other expenses. The cottages have only started making a profit this year due to the investment that has been made. The effects of the proposal would be devastating and as a result, we would have no choice but to sell the smallholding and our home. The likelihood is that it would be sold at a large loss given the lack of sustainable business, which severely affects our pension pot.</p>
<b>Personal impact</b>	<p>The impact would be devastating. We have invested all our money in to our smallholding and have worked hard to build up a business using the buildings on site (I had to work 3 days a week for a few years and my partner worked away from home until the pandemic, just to fund our life here). The cottages will never make huge sums of money but they do allow us to stay here and live the life we enjoy. Having to sell when the cottages are not a viable business means we would struggle to sell the place without making a loss on our investment. This is terrible given that I am 60 (my partner is 65) and this was to be our pension provider. Selling the smallholding means we lose money, and also our home. I managed to stay open during the pandemic, despite not being given any government help - including the £10k grant. I used my own money to buy all the items needed to reopen safely, and was expecting to have a good number of years here running the business and recouping the money spent on covid issues; before retiring and enjoying the fruits of all the hard work. We worked hard away from the smallholding to fund this project, and were really looking forward to being able to finally spend time here enjoying the lifestyle that we bought this place for. Now I don't know what will happen!</p>
<b>Turnover</b>	<p>I work on tax years: 2019/20 - net of VAT £12,981 2021/22 net of VAT £20,000 estimated. 2019/20 was a really bad year after moving to Cottages.com and as a result of their failures, I moved to West Wales Holiday Cottages in 2020.</p>
<b>Incremental cost of Council Tax at cost</b>	<p>£3520</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>£7040</p>
<b>Incremental cost of Council Tax at 300%</b>	<p>£10,560</p>
<b>Planning Permission restrictions</b>	<p>The latest cottage definitely is holiday let only and must close each year. The original cottage was sold part of the</p>

	sale of the smallholding and was sold to us as being a holiday let.
<b>Any Other Comments</b>	

<b>Business Details</b>	Three barn conversions for holiday let use on farmyard, Penbeili Mawr, Ceredigion
<b>Short Description</b>	rural location, trading for over 20 years
<b>Impact on the business of 182 threshold</b>	<p>Our business model does not rely on a 182 day let. We have not consistently met this threshold as it is not a realistic threshold for our business model and we have not enough time to business plan and implement the changes.</p> <p>Over the past 7 years we have averaged £30,000 turnover, with profits of between £5,000 and £12,000. It works alongside the other work we do and pays for the upkeep of the properties, allows us to survive here. It makes it all viable. Having to pay council tax (or business rates if they remove the relief) would literally mean little / no viability. They would just be running to pay the tax. Closing the units is a very real prospect we have had to put on the table pending the consultation legislation details in April. How we would go about doing that, I do not know as I understand via rumours that removing the kitchen would not help release the tax burden.. For use residentially. It would require planning restrictions lifted / change of use and if permission granted significant investment and restructuring to make them residential, as well as a complete overhaul of our businesses and business planning.</p> <p>As you may be aware there are currently planning restrictions in catchment areas of the Teifi due to phosphate levels and the NRW. One of the stipulations is the inability to uplift a commercial premises into residential due to the NRW restrictions and being in a area of special interest and the likelihood of increased phosphates into watercourses.</p> <p>So even if we were up for splitting the farm property up for residential use (we are not by the way, the farm has been here for centuries), it would not be allowed as we are in the Teifi catchment area. Furthermore, even if it were allowed, the barns have been designed for temporary accommodation. So the utilities for example are shared. We are in a commercial RHI contract with the heating system for the barns, which are run from a biomass system on our yard that we manage. So we would lose any investment on that.</p> <p>As well as having to put separate heating systems in for each cottage. Then there is the electric supply which is run on a commercial MPAN electric meter within the curtilage of our own home which supplies the three units. As well as septic tank issues and lack of storage and design for long term living.</p>

	<p>We are rural. No pubs or shops walking distance, it can be a hard sell to have high occupancy. The small unit is feasible as we have couples all year round, but the larger family units are very difficult to fill out of season and it is the small cottage that lifts the averages up across the units. Our business model does not run on a minimum of 182 days, never has and we would not consistently meet it and for that we will have SEVERE and unfair tax penalties that we simply would not be able to pay. We usually meet around 130 days a year per unit comfortably. Having no notice to implement the required business changes is unacceptable. Our 2023 rates are already published and the new legislation is not.</p>
<p><b>Personal impact</b></p>	<p>It is difficult to respond without using emotion. The legislative changes in my opinion go beyond unfairness to the realms of being cruel. It is very difficult to read that your business is being purposely destroyed by your government via the media and not to receive proper direct consultation from government to the property owner. We have all the stresses that everyone else has with rising costs of heating, fuel and electricity and inflation in addition to the health effects of stress from our business being (intentionally) destroyed by government.</p> <p>With the VOA forms issued again within the usual 3 years, it looks likely that this was all intentional. I cannot see any of this has come about by ignorance. I worry about the future of living under a government that can do as it pleases to the detriment of it's citizens and unalienable laws.</p> <p>There are three generation of family on site here that rely on this business. It jeopardizes our right to enjoy our own property and family life.</p> <p>It is a diversification of the livestock farm. We live here and run all three arms of the partnership from this property. This includes agricultural contracting, livestock farming and tourism. Our family is here. They all live in Ceredigion and one family member with advanced Alzheimer's requires 24/7 care which is provided from here. The farm cannot run without the holiday lets. We cannot live here without the viability of the holiday lets.</p> <p>It is unacceptable to have your business controlled in this manner by government. I also wonder about the legalities of how all of the policies are going to work. The policies are clashing with others, such as the SSSI of the river Teifi and increased phosphates from overall effects of increasing nights let from 70 to 182 across the whole SSSI regions. The legal definitions of a property as per planning rules and regs, insurance and land registry. No other business is controlled in this manner. There are many other commercial premises which have electric, heating, drainage and kitchens, such as butchers, cafes, retail shops and warehouses who are not subjected to such dictates. A</p>

	<p>shop can be open for just 6 months of the year and is not subject to minimum sales of goods. A local warehouse supplying goods is not penalised if they do not shift enough items through the door. It is complete and utter obvious discrimination. I can understand having to meet certain additional criteria if you are removing a home out of housing stock as there is always the option of selling and reverting back to residential, but if you cannot be anything else other than holiday use and are not removing housing stock then; why?</p> <p>How would our business and commercial premises with no permissions or design for residential use being made unviable overnight address the housing shortage? What is the relevance or purpose of this legislation in our circumstance?</p> <p>We do not have the luxury of selling the business (holiday lets) as we live and work here ourselves and several generations are dependent on its viability. The units have been here for more than 20 years contributing to the local economy and reduce burden on housing stock being brought up for change of use from residential to commercial, holiday use. These conversions were never depriving anyone of a home. They were never anyone's home.</p> <p>Difficult to gauge the intention of any government of late, but this is certainly not just about second homes.</p>
<b>Turnover</b>	Over the past 7 years we have averaged £30,000 turnover, with profits of between £5,000 and £12,000. The following figures include the SBRR covid grants; Year end 2019, our turnover was £30,337 and in 2020 it was £36,714.
<b>Incremental cost of Council Tax at cost</b>	<p>I do not know how much council tax we would have to pay as they have never been banded. They have always been commercial premises as per planning stipulations. We currently are on £6,200 business rates and so qualify for most of the business rates relief. But even at £0 rates on Band A in the Llandysul area for 3 x units would be; £1183.44 in 2022/2023. So we would presumably have a minimum tax bill of £3,550.32 on the same property that we also pay council tax on the farmhouse of £2,564.10. That is a total annual tax bill for ONE PREMISES of £6114.42.</p> <p>This is purely conjecture as we are trying to plan blind without the legislation even being published or knowing what tax band we would be put in.</p> <p>£3,550.32</p>
<b>Incremental cost of Council Tax at 200%</b>	£7100.64
<b>Incremental cost of Council Tax at 300%</b>	£10650.96
<b>Planning Permission restrictions</b>	The units have planning specifically for the use of 'holiday lets'.
<b>Any Other Comments</b>	

<b>Business Details</b>	We have two, holiday cottages on our small holding. Ceredigion, West Wales
<b>Short Description</b>	We are 20 mins from the Ceredigion coast in a rural setting. We have lived here for 6 years & have been building up our business since then.
<b>Impact on the business of 182 threshold</b>	Ceredigion is very seasonal, the shops, pubs, cafes etc in the area close down through winter. Tourism naturally reduces at this time & the residents are not enough to sustain these businesses through winter - but they make enough money from tourists from April - October to account for this. By imposing the 182 days let rule many small businesses like our own are no longer viable, so you are effectively putting many holiday lets out of business, which in turn will mean the pubs, cafes, attractions and all the many other ways our business supports local economy will also no longer be viable. For businesses like ours which have planning restrictions, imposing this rule won't help the housing problem. This is far bigger than just us. The 182 rule would mean we have to be completely fully booked from April through to October or face unreasonable charges. Which means no days booked out for maintenance. No taking holidays ourselves with our young children during spring or summer. Our accommodation is available 12 months of the year, but bookings can be very sporadic through the winter as we are rural. To meet this figure we would have to be full for the spring/summer months as we couldn't rely on winter bookings bringing the numbers up enough to meet this number, but that isn't realistic. Our turnover has increased every year but we have never been close to 182 day let. That does not mean our business is not a valuable one. Our small business alone puts over £10,000 into the local community, that's before our guests eat in local restaurants, use local shops etc.
<b>Personal impact</b>	We - husband, Mum & myself moved here 6 years ago to set up this business, we now have 2 young children as well. We gave up good careers & sold 2 houses to buy our small-holding to build a better life for our family. We have spent an awful lot of money renovating the holiday accommodation and the land around us. If we can't reach 182 days there is no way we could fund a 300% council tax bill, nor should we have too. Our business is still growing & evolving, we are not contributing to the housing crisis, if our cottages cannot be let for holidays planning restrictions mean they will stand empty or we will have to sell everything. Again that will not help the housing crisis. Who does that help? We have made huge efforts to integrate into our community. This is our home as well as our business & our boys go the the local Welsh medium school & are both fluent in Welsh. We do support an increase to the number of days let, but a more

	realistic one. 105 days let, which is in line with HMRC's FHL rule seems far more attainable.
<b>Turnover</b>	2019 - £39,906 2021 - £44,123
<b>Incremental cost of Council Tax at cost</b>	We already pay council tax for the properties as a whole, as our cottages are attached to our own home, they share all the same utilities.
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	Our cottages have planning permission only as holiday lets, not residential and are restricted to 28 day lets.
<b>Any Other Comments</b>	

<b>Business Details</b>	Country Cottages and Nature Reserve, a self-catering business now for about 50 years.
<b>Short Description</b>	<p>We are only the second owners and we have run it already for more than 24 years of those 50. In the 1970s, the previous owners converted the derelict outbuildings into self-catering accommodation. They never were habitable dwellings previously and have therefore never been used as permanent homes, nor were they ever removed from permanent housing stock. Our predecessors ran it as a professional business and so do we: we have no other source of income, we are a properly incorporated company, are fully independent and do our own marketing and letting - no middlemen, no Airbnb, no agencies.</p> <p>We have nine cottages within one curtilage, we live on site ourselves and put in an extremely large number of hours and amounts of money to make the place work. We do not pay ourselves a large salary, and all our spare cash is ploughed back into the property. Living locally, we have put a truly enormous amount of money into the local economy in the form of employing local staff, local tradesmen and buying from local companies. Old properties such as this require constant significant maintenance, and lots of work to keep up-to-date with ever evolving customer demands. And all of this is without counting the money our guests spend while in Pembrokeshire.</p>
<b>Impact on the business of 182 threshold</b>	<p>Over the past 24 years we have seen great changes in self-catering, of which the changing balance between supply and demand has been the most worrying one:</p> <p>Stimulated and approved by national and local governments more and more self-catering properties have come into the market: the largest single addition in Pembrokeshire being the approval of the Bluestone development. Farmers have been stimulated to diversify and convert redundant outbuildings into self-catering accommodation.</p>

More and more, increasingly international, companies have entered the market of marketing these self-catering properties (TripAdvisor, Airbnb, Hotels.com, Booking.com etc), with their global marketing power drowning out smaller, local establishments/companies. The money they earn on the back of this does not stay local but gets transferred out.

National papers & organisations use their publications to promote big marketing companies such as the ones above and others (such as cottages.com).

These marketing companies aggressively look for more and more properties to put on their portfolio: it does not matter to them if 100 weeks are booked for ten different cottage-owners or for a 100: the marketing company earns the same amount of money.

On the demand side, major developments such as Foot & Mouth, the financial crash of 2008, cheap flights overseas, and recently Covid-19 have had a severe detrimental effect, often for years to follow.

We have tried to cope as best as we can and worked more and more hours to compensate for the lack of money and/or the inability to attract enough staff at times. That is not a complaint, just stating a fact. Some years are good, some are bad, some are just so-so, and we take it all on the chin. But .... we have to work within realities and one of the realities we have found over the last 24 years is that it is nigh impossible to achieve an occupancy of 85% (which 182 days amounts to) within our earning period, which is basically between April and the end of October. Even in our very best years, just having taken over, with the market far less saturated with supply, we never managed 26 occupied weeks per cottage. Please note that this was when the Tourism Department of Pembrokeshire County Council was very active and successful to pull people to Pembrokeshire and Visit Wales was spending much more on marketing Wales than it has been doing of late.

Sure, we are open all year round (that is no problem at all) and we would welcome having people all year round but it is an undeniable fact that not many people take a holiday in Pembrokeshire between November and Easter, however much we do our best. Those in the know may remember the ongoing mantra of "extending the season" and "filling shoulder weeks": largely unsuccessful. The people that do come to Pembrokeshire in that period might prefer an establishment with more services on site: different businesses cater to a different category of guests, as they should.

We know we are a proper, professional business and we challenge anyone to say differently. We are sorry to have to



say that it truly galls us that the establishment of an artificially high number of occupancy days required - we dare guess, by people that have never run a business such as ours - will endanger our business. We think that is not right.

We sympathise with the fact that there are problems to be solved with second home ownership, but this is not the way to do it. Government decisions have led to this situation (allowing council houses to be sold off to tenants, not building replacement housing to make up for sold off property, allowing more and more holiday developments, and allowing Airbnb to take such a foothold while their accommodation suppliers are not hindered by any of the rules a business such as ours needs to adhere to, to name but a few): are we as a private business now asked to take the rap for it? As said, that does not seem right.

We operate in a complex market: our competitors are not only other self-catering accommodation providers but also campsites, B&Bs and hotels in Pembrokeshire, Wales, United Kingdom and Europe. Blanket singling out of self-catering providers in Wales for these restrictive measures will make self-catering businesses such as ours completely unviable, but not because we would not be a proper business (we are no different from aforementioned campsites, B&Bs, hotels, or plumbers and other service providers for that matter. As far as we know, none of these have to show they let a minimum number of nights or have a minimum number of orders on their order book to classify for business rates). How can a holiday complex such as ours, which has never been anything but a holiday complex, within the same curtilage, sharing the same heating system (biomass, put in at staggering cost), a single electricity and water supply, having already been run for 50 years on a fulltime basis and being the only source of income for its owners, not be classified as a business for business rates purposes? It would be beyond our comprehension were that to happen. It would put us out of business, and, at the stroke of a pen, make our property that we have always lovingly cared for unsaleable.

We urge you to use your influence to make the Welsh Government reconsider these measures as they are formulated now.

We ourselves are more than happy to talk to anyone about the practical consequences of the intended measures for our business. It is imperative that our voice and voices of colleagues in similar circumstances should be heard, loud and clearly.

<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Single detached bungalow, just outside the pretty seaside town of Tenby, Pembrokeshire.
<b>Short Description</b>	Sleeps 6 in 3 bedrooms, Enclosed garden with rural views; Off street parking for three cars Started the business Easter 2007 (15 years)
<b>Impact on the business of 182 threshold</b>	<p>The house is uninhabitable over the winter months because it is on a flood plain. So, our booking window is limited to April to October. 182 days = 26 weeks = 6 months: That's very tight when I can only have availability for 7 months a year. Having just looked over my bookings I can see the fragility of the business; it doesn't take a lot for the business to have a bad year. I think there will be years when I cannot make that threshold.</p> <p>With talk of Tourism Tax and contracting the school summer holidays amongst other ideas coming out of the Welsh Assembly it's hard not to think we are under attack from them.</p> <p>I have worked hard to build it as a business and reinvested a lot of money, to give guest what they want so they can have wonderful holidays</p> <p>The other thing that I wish to mention is the impact on the town, it wasn't that long ago that Tenby was looking very sorry for itself, full of closed shops and rundown B&amp;Bs. Guests don't want to stay in B&amp;Bs and guest houses anymore, they want privacy, space and to be able to come and go as they please. My grandmother ran the house as a B&amp;B in the 70's, 80's and 90's. Now there are a lot of what were B&amp;Bs in the town being converted into holiday lets as that is what the market demands</p> <p>My fear is that the cost of running a business is bore by the business' customers, if it gets too expensive to stay in Wales people will go elsewhere and we will see the tourist industry contracting and seaside towns looking rundown again.</p>
<b>Personal impact</b>	Fear And Anxiety of losing the house, business and the much-needed income. I am a caregiver: My partner is unable to work due to his disability, over the last decade his income from benefits has diminished to peanuts. I'm worried about the house and it getting attacked by people wanting to make a point about second home owners. First there were a few comments from people in the village about second home

	<p>owners, but then they said to me “but you’re not one of them this is a holiday let” Then Covid came and a couple of councillors were very vocal in the local paper saying that second home owners had gone over to business rates and were getting grants from the council – without saying how difficult it was to get a grant and that 50% of your income had to come from the business. It was so unfair they used stats like how many empty properties were in the county, but didn’t say how many of them were residential. So, they just blurred the lines between second home owners and Self-Catering Holiday Lets, using phrases like “Morally Indefensible.” It’s been mentioned I should write to my local councillor, but when looking on his Facebook page at comments about burning down second homes I dare not make myself more visible to him. My house was built by my grandmother and then refurbished by my parents to a letting standard then I inherited it. I have a massive emotional attachment to the house, if I were to lose it would be a big loss, like losing my family again.</p>
<b>Turnover</b>	<p>2019 £12961.00 2021 £14211.89</p>
<b>Incremental cost of Council Tax at cost</b>	£1249.17
<b>Incremental cost of Council Tax at 200%</b>	£2498.34
<b>Incremental cost of Council Tax at 300%</b>	£3747.51
<b>Planning Permission restrictions</b>	<p>Not a planning permission issue. The house is on a flood plain, and the garden floods between Nov and April. Being just out of town we are not on mains sewers so have a cesspit. Over the winter months the water table is high and the cesspit infills with ground water making the house inhabitable as the sewerage system fails.</p>
<b>Any Other Comments</b>	

<b>Business Details</b>	5 bedroom house in Tenby
<b>Short Description</b>	<p>Operating for over 18 years, I have an established client list with many families coming back to stay in it every year. I actively promote local businesses to my guests.</p> <p>It is my only source of income and I have always tried to maximise the number of let’s each year. From experience I can say, as a large rental property, It is very difficult to get rentals outside of school holidays as my guest are predominantly family groups and unless Welsh Assembly is going to endorse parents taking children out of school in term time the huge jump of 182 day threshold to qualify for small business relief is completely unachievable to me. Just to clarify these changes will be terminal for my business.</p>

<b>Impact on the business of 182 threshold</b>	<p>If I had a smaller rental property which attracted couples and guests not reliant on school holidays I would expect to get more holiday let's a year.</p> <p>Looking at the economic benefits to the local community a large family group of 10 will be spending a lot more money than a couple in that week. This has not been considered in the 182 day threshold. Tenby relies on families going to Folly Farm, Oakwood, Anna's zoo, Dinosaur Park, Heatherton ..... not to mention they support the ice cream parlours, chip shops, Caldys boats, shops .....The 182 day threshold forces larger holiday let's out of business, my regulars will be devastated when I shut down and I think they will find it very difficult to find family accommodation in Tenby.</p> <p>You may find plenty of small holiday let's but a real shortage of family holiday let's available.</p>
<b>Personal impact</b>	<p>For me personally I feel very unfairly treated. If other small businesses were told to increase their customer base by more than 250%, or face their business rates increasing to a level that makes their business unsustainable there would be outrage. It is clear to me that I as a established holiday let am being treated differently as a knee jerk reaction to stop second home owners claiming they are holiday let's to avoid the up to 300% increase in council tax.</p>
<b>Turnover</b>	<p>In an average year I would expect my turnover to be around 18 k, from that figure I normally clear around 12 k, a modest income but very welcomed as my only one. Recently things have been more challenging, it seems very cruel to feel the sledge hammer coming down on me when energy prices are rapidly rising and as a business I am still dealing with the after effects of COVID. If I lose small business relief and have to pay council tax it would be a struggle but maybe possible. If the council tax applied was 300% it would be well over 6 k and put me out of business. Even at 200% it would be unsustainable.</p>
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>The timescale of these measures being introduced in April 2023 means I have to make a decision imminently to not take bookings for next year. It is unlikely that my property will be sold, I see myself being forced into retirement on a very low income.</p> <p>I will be very sad to let my housekeeper go, window cleaner the local man that does my gas safety certificate, my local decorator I have used for years, gardener etc. Local people</p>

	<p>have relied on businesses like me for income and I can't see how running me out of business is beneficial to anyone.</p> <p>It may well be the very measures that are being introduced in the name of helping local communities will have the opposite effect of economically devastating them.</p> <p>I can only ask that you actually listen to the points being raised from established businesses like mine and don't just treat this consultation as a tick box to ignorantly introduce these ill thought out measures.</p>
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<b>Business Details</b>	A 2 bedroom holiday cottage, just on the outskirts of Blaenau Ffestiniog.
<b>Short Description</b>	My husband and I bought it in January 2017. Sadly my husband passed away in 2020. We started trading in 2017 and having been advertising through our own website and other 3rd party sites, such as Trip Adviser, Independent Cottages and Airbnb. Even though the cottage is located near a town the season is just a short one. I average 120 /135 nights a year.
<b>Impact on the business of 182 threshold</b>	The impact of the proposed 182 nights would be devastating for us. Our cottage sleep 4 people and many of our guests require minimum stays. For us, that usually means between 3 and 4 nights. Summer time may see a 7 night stay but during the winter months and early spring we may not have any bookings at all!! We are open 365 days of the year but even though we advertise extensively, through Facebook too, we cannot force guests to come and stay. During the quieter times we visit for maintenance purposes. We employ a housekeeper and a gardener, both local people to the immediate area. Our guests contribute to the local economy greatly: days out exploring, eating out etc. which in turn gives employment to people who, without Tourism, would not be employed at all. That is not the fault of the holiday let owner but the Welsh Government who are not building new homes or ensuring employment through industry.
<b>Personal impact</b>	My husband was a farm worker and we still live in a tied cottage on the estate. Our cottage in Wales is our only home, we don't own another, so it's not a second home. Being a widow and still responsible for 2 children running our cottage as a holiday let gives me a secure, though small income, from it. I work part time as a Lunchtime Supervisor/ Teaching Assistant and the income from the cottage makes up over 60% of my income. If I can't make the 182 nights then this will be no longer viable for me and I would have to seek benefits from the Government...how can that be right?? For the Welsh Government to say that I am not a genuine holiday accommodation business, because I won't be able to reach the ridiculous number of 182 nights, is unworthy of

	<p>them. We have been through 2 very difficult years due to Covid-19, rising bills and an ongoing war in Ukraine. Many holidays will be taken abroad this year and we have to compete with that too. This is all too much to bear. If Tourism is killed off by people who are supposed to love their country, and nothing is put in its place, then Wales is done for. I give back to Wales in supporting its culture and economy and this is how they repay us. A move to 300% council tax would be my income gone. Housekeeper and gardener fees would come out of this plus electric, gas etc. It would finish me.</p>
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	2070
<b>Incremental cost of Council Tax at 200%</b>	4140
<b>Incremental cost of Council Tax at 300%</b>	6120
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	<p>My husband and I bought a derelict "farm yard" 35 years ago in Tresaith Nr Cardigan, Ceredigion.</p> <p>We converted one barn where we have lived as our main residence/home during this time.</p>
<b>Short Description</b>	<p>We converted another outbuilding at the same time which initially was a holiday let 35 years ago. After several years we decided to rent it on a short hold tenancy to private tenants. Unfortunately, we found that tenants just did not look after the property, it was abused and wrecked and the gardens were left to overgrow etc. The final straw was our last tenant, who not only wrecked the cottage, was verbally abusive to us and family and made our lives a living hell. When they left we had to refurbish the cottage yet again, and then decided that we could not face another tenant and 7yrs ago returned to running it as a holiday let.</p> <p>For 35 years it has been 100 per cent business, it has never been a second or holiday home and we have never used it for family or friends.</p>
<b>Impact on the business of 182 threshold</b>	<p>Although, at present, we advertise our holiday let for 10 months of the year, we do not feel we will be able to achieve the new criteria you have set.</p> <p>We block January and February to for maintenance, repairs painting etc.</p> <p>We feel that even if we advertised for 12 months this number would still be unachievable.</p> <p>We cannot force people to book no matter how many weeks we make it available for.</p>

	<p>This is because:</p> <ol style="list-style-type: none"> <li>1. Bookings are already down from last year, which was an exceptional year because of staycations.</li> <li>2. There is now increased competition from: <ol style="list-style-type: none"> <li>a) new holiday homes purchased last year as second homes/investment</li> <li>b) properties previously occupied by tenants now being turned into holiday lets</li> </ol> </li> <li>3. Potential guests now returning to foreign countries for holidays</li> <li>4. Potential Guests now owning their own holiday home here</li> <li>5. Potential guests buying motorhomes/touring caravans instead of renting holiday cottages</li> <li>6. Potential guests looking for cheaper holidays ie: camping</li> <li>7. Potential Guests just not being able to afford to holiday because of inflation etc</li> <li>8. Fewer foreign visitors coming this year</li> <li>9. There is a limited season where we are in West Wales compared to other locations with more attractions etc.</li> <li>10. We tend to attract retired couples and not so affluent families who are now being hit the hardest from the recession who are now not booking.</li> </ol> <p>All in all there are fewer people coming to this part of the country with more holiday cottages available to choose from. We cannot reduce prices, we are still advertising at last years prices although Electricity, Gas and and Oil have gone through the roof.</p> <p>How can we get more "lets" if there are fewer "guests" coming?</p>
<b>Personal impact</b>	My husband and I are both pensioners, and have a basic state pension, so this extra income from the holiday let is critical for us to live.
<b>Turnover</b>	In the year ending April 2020 the turnover was £15,101 (income £9078 expenditure £6023) Profit £3056. In the year ending April 2021 the turnover was £13,803 (excluding covid grant of £11,000) Expenditure £6920 Profit £10,963 including the covid grant of £11,000. (bookings were down to covid restrictions)
<b>Incremental cost of Council Tax at cost</b>	1660
<b>Incremental cost of Council Tax at 200%</b>	3320
<b>Incremental cost of Council Tax at 300%</b>	4980
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	We really cannot afford to pay council tax as you can see from the above figures.



	<p>We really do not want to have to go down the route of renting again to unappreciative tenants because of the reasons explained above, and because of the location of the property</p> <p>to the house we live in, it is not possible to separate and sell, so the only alternative is for us to be forced into selling our home of 35 years, which we really do not want to do, and move elsewhere.</p>
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<b>Business Details</b>	Two Holiday Cottages in Carmarthenshire.
<b>Short Description</b>	Consisting of two holiday cottages. We have converted farm buildings into two holiday cottages, sleeping six and two. We are in a peaceful, rural location with great views overlooking the River Taf in Carmarthenshire. We have been trading for 15 years.
<b>Impact on the business of 182 threshold</b>	<p>It would be impossible for us to reach this threshold. We generally manage to get around an average of 106 nights a year. We are open all year. The season for us start around Easter and carries through to September. Even though we live in an idyllic location, we are unable to compete with the attractions of larger towns and tourist spots such as Tenby. We attract walkers and wildlife enthusiasts. Our winter weather does not entice many to stay in our area during the winter months. We also suffer from many more second homeowners doing AirB&amp;B. For these owners it is merely an income flow to pay their utilities and they are able to charge lower rates. This impacts us and takes away from our income. When we started holiday lets over 15 years ago, there were far fewer holiday lets available and we managed to get more nights let and a larger income. Clearly, we would close our business if any of the above were to come into force. Utilities are doubling and increases in other ongoing cost all add to the business being non-viable.</p> <p>To be truly profitable as holiday let, a great deal of investment/ marketing/ social media would be necessary. This is definitely not a market we would be entering into in the current climate.</p>
<b>Personal impact</b>	We purchased a derelict farm in 1998 with the intention of rescuing it and sharing

	<p>our delight in the area with others. We proceeded to renovate the farmhouse for our own use(our home and primary residence) and two barns for holiday lets. We thoroughly enjoy meeting new people and ensuring they get the most out of their visit. We have been fortunate to benefit from the small business rate relief and feel that the area benefits greatly from the tourism we attract. Paying rates would question the viability of our business. Unfortunately, as the cottages are part of the whole farm, it would not be a matter of selling them off. We are retirement age and wish to continue with the business.</p>
<b>Turnover</b>	<p>Our turnover for the year to April 2020 was £16630. It then reduced during the covid year to £14719. Last year saw an increase, (135 nights) with more people holidaying in the UK. We believe this year will be lower, as people will be searching for sunshine and going abroad once more.</p>
<b>Incremental cost of Council Tax at cost</b>	£3200
<b>Incremental cost of Council Tax at 200%</b>	£6400
<b>Incremental cost of Council Tax at 300%</b>	£9800
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>I do not believe we should all be categorized under the same umbrella as other second homeowners. We have diversified our farm and rescued derelict buildings to encourage people to explore the area. We are passionate about the area and hope that we can continue to share this with our guests.</p>

<b>Business Details</b>	<p>Three bedroom holiday let apartment annexe, sleeping up to 8 guests on the ground floor of our family home in New Quay</p>
<b>Short Description</b>	<p>Trading for 10 years. I let out the ground floor of my family home on a self catering holiday let basis. It is not a second home but part of my property. It is available to let for 11 months of the year. Despite it being in a great location with stunning views overlooking the bay I have never been able to let out anywhere near the potential new 182 nights. Last year was the busiest year by far to date due to families having 'staycations' because of the pandemic. I still did not reach that threshold.</p>
<b>Impact on the business of 182 threshold</b>	<p>I cannot foresee being able to afford to stay open if the proposed 182 night or 300% council tax charges are</p>

	<p>actioned. I am already having sleepless nights worrying how I will be able to afford to pay this. The extra expenses of cost of living, extortionate rise in electricity and heating oil is already going to impact on the outgoings costs of running our holiday accommodation. I foresee it will also have a big impact on the number of bookings as potential future guests aren't going to have the disposal income of previous years to spend on luxuries like family holidays or weekends away.</p>
<b>Personal impact</b>	<p>I understand this proposal is due to the concern on the number of second homes as holiday lets instead of homes for local people. Sadly this will also impact those of us who let out annexes as part of our own homes, not second homes. It is extremely unfair that we would be expected to pay 300% council tax on a part of our family home. The impact on tourism and therefore jobs for locals will be devastating if this proposal goes forward.</p>
<b>Turnover</b>	<p>2019 - £19000 - 140 nights let. 2021 - £28000 - 162 nights let. (Turnover higher in 2021 in relation to nights let us due to much higher number of early advanced booking deposits for 2022 season)</p>
<b>Incremental cost of Council Tax at cost</b>	<p>£2568</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>£5163</p>
<b>Incremental cost of Council Tax at 300%</b>	<p>£7704</p>
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Name</b>	<p>Barn conversion and cottage just outside Carmarthen in a rural location</p>
<b>Business Details</b>	<p>I have been trading as Holiday Lets since 2006 (Barn) and 2018 (Cottage) Having had to give up cattle farming, this is my sole income and, living on my own this is the only wage coming into my household. I am a qualified World Host, Carmarthenshire Tourism Ambassador and Superhost. My cottages are my primary/sole full time occupation (not some secondary bonus income from a second home)</p>
<b>Short Description</b>	<p>The impact of the 182 day rule and Council Tax in lieu of Small Business Rate Relief, together with the doubling of fuel, heating oil and electricity costs, would mean me making a loss, and without an income at all I would have to sell up my family home of 20 years. Whilst the occupancy rate of the cottage would achieve the 182 days most years, there have been years in the past when this has not been the case due to travel trends. In fact this was why I made the second cottage to appeal to a different demographic and supplement the nights sold during a shortfall on the main one. The smaller cottage is not suitable for long term occupancy and the implementation of any council tax, and</p>

	<p>definitely 200% and 300% would actually be more than the gross income generated.</p>
<p><b>Impact on the business of 182 threshold</b></p>	<p>I currently pay £1760 for my house with sole occupancy relief making it £1460. That is between 10% and 20% of my household income. Should, heaven forbid, I have to find 300% x 2 cottages as well, that would be potentially reducing profit and therefore income by a massive £10,560 per annum , which would make it untenable to try and run a business here. It's not as though I would ever use the properties for personal use as they are both in my yard , not situated and run by an agency miles away from home.</p> <p>Due to the toll more intense cleaning, and longer hours preparing between guests , and the trend for guests to want to only stay for shorter stays, as opposed to the full weeks when we actually had just one changeover day, to make it even physically possible to do all this work myself, as there is not enough money to pay someone to help , I have had to impose a 2 night minimum now, as that could mean 6 changeovers and hosting (consumables/welcome packs) per cottage each week , and as a result I have seen that my occupancy is down this year.</p> <p>I simply cannot physically do single night after single night hosting any longer, and therefore , that together with the fact that holiday lettings have become so over subscribed , and we are all fighting for a smaller slice of the same cake in the county whilst having to offer more and more to guests to win the bookings, and spend more time actually hosting, I can see this year is going to be very tough. My smaller cottage really was intended for, and appeals to, a demographic who only want single night bunk house style properties. Pre-pandemic the majority of my guests in that young couples wanting a single meet up or were back-packers, and mostly foreign, travelling through. With very few coming from the continent this year or undertaking this sort of travel my calendar for the smaller cottage is virtually empty as opposed to being the more popular of the 2 before the pandemic due to the fact I have had to impose a 2 night minimum. I can see I will struggle to meet 182 this year even though both cottages are available 365 days of the year.</p> <p>We cannot force people to come and stay and the booking agencies are constantly trying to push our rates back down to what they were a decade ago due to the amount they have on their lists, bookings seem to be more last minute, and guests' commitment to dates seems to be insincere with last minute cancellations seeming to be the norm since re-opening, and if we then have to contend with being punished financially for achieving fewer guest nights , it makes the whole effort of trying to run it as a main business impossible. My cottages have a covenant on the planning that it's use solely for holiday let, not privately lettable too.</p>

	<p>I have always felt that the County benefits financially from my hosting far more than the amount I receive myself. I have the role , which I do enjoy , of unpaid tourist guide, as I endeavour to get guests to get out and enjoy the whole wonderful area of Wales, and encourage to re-visit. They spend in local shops, the local garage and support local food producers and eat at local hostelrys, all of which provide incomes for other staff , employing local residents. My cottages generate between just £15 per person - £55 per person per night depending on which cottage, time of season and length of stay so you can easily see , whilst it generates a moderate income to support myself , it would cease to overnight, should the threshold etc be imposed as the figures just don't support it.</p> <p>I am not in a privileged position of owning 2 homes or more, these are my business premises, not a luxury. My diversification into farming people as opposed to livestock was undertaken in order to make an income, not supplement it.</p> <p>I feel that we genuine full time hosts are being penalised due to the influx of those who don't really care about visitor experience , just about fatter wallets to subsidise their second homes. There must be some measures to discourage the grabbing of homes , causing a housing crisis due to making property values soar, but this is not the way to do it. I also know that it is going to be tough for us long term established hosts to weather this storm of oversupply (when I fir,st opened and got Visit Wales 5 star grading, there were only 5 of us at that grade doing self catering in Carmarthenshire. You look on any booking site now , any night of the year and there are 300+ within a 5 mile radius !) and it would be great to have fewer properties to compete for guests against , but again these measures are not going to address that.</p>
<b>Personal impact</b>	
<b>Turnover</b>	My income from the 2 cottages together in pre-pandemic years was between £8k -15k which was sufficient for myself.
<b>Incremental cost of Council Tax at cost</b>	I currently pay £1760 for my house with sole occupancy relief making it £1460. That is between 10% and 20% of my household income. Should, heaven forbid, I have to find 300% x 2 cottages as well, that would be potentially reducing profit and therefore income by a massive £10,560 per annum , which would make it untenable to try and run a business here. It's not as though I would ever use the properties for personal use as they are both in my yard , not situated and run by an agency miles away from home.
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	

<b>Planning Permission restrictions</b>	The property can only be used for holiday use.
<b>Any Other Comments</b>	

<b>Name</b>	One Holiday letting
<b>Business Details</b>	One holiday cottage. Trading for 32 years.
<b>Short Description</b>	
<b>Impact on the business of 182 threshold</b>	The impact of 182 day threshold would not apply in good years but in some years, due to market forces, weather conditions and other factors beyond my control, I may not achieve this minimum and I don't know what I would do. I cannot realistically sell the property as it attached to my home. This is my main source of income.
<b>Personal impact</b>	The impact on myself would cause hardship unless I could remain above the 182 day threshold. This is my main source of income. The combination of being below the 182 day threshold (thus having a lower income) and having to pay high rates would be punitive.
<b>Turnover</b>	My turnover in 2019 was £14,749.(6th April 2019-5th April 2020) I do not have the 2021 figures available yet as the tax year does not finish till today.
<b>Incremental cost of Council Tax at cost</b>	£1,498
<b>Incremental cost of Council Tax at 200%</b>	£2996
<b>Incremental cost of Council Tax at 300%</b>	£4494
<b>Planning Permission restrictions</b>	The cottage was converted by my late husband and myself in 1990 from an original stone barn into a purpose converted holiday cottage. It does not have planning for a residential property and there is a restriction on how many days a year it can be available to be occupied. I cannot long let it full time or long let it for the winter. It is not an investment property or a second home. It has supported the local economy for over 30 years by using local labour and services for maintenance and accommodating visitors who spend their money in local attractions, shops, restaurants etc. It is available to be let to holidaymakers and I don't believe that I should be penalised by paying rates if I am unable to reach the minimum 182 days though I will do my utmost to achieve this.
<b>Any Other Comments</b>	

<b>Business Details</b>	Holiday Apartment, Llanwrda, Carmarthenshire
<b>Short Description</b>	Very rural- hill top location in North West Carmarthenshire. Very wet and windy. Sheep farming area. Two bedroomed Luxury Eco Friendly Self- Catering apartment operating for 3 years. Within our only home on ground floor of the house. We live above the self -catering flat on the 1st and 2nd floor

	<p>of the house. We live on the premises! We spent 3 years converting the ground floor and our grounds to a very high standard, spending over 150,000 including fitting 16 solar panels, Sonnen Battery storage and smart home eco controls to limit our carbon emissions. We are the only self caterers in Wales to have done this as far as we are aware.</p> <p>The area has no local school, no shop, no public transport, no employment apart from sheep farming. A few derelict cottages in the area have no local interest from buyers as remote location. Very wet in winter. We are booked for mainly school holidays. In this quiet rural area it is a 4 month holiday season May-August only. Llandovery our local town is mainly closed in the winter. All of our guests 99.9% are from England, Scotland or Ireland. They spend a lot of money when they come away on holiday in the local shops, pubs and surrounding attractions.</p>
<b>Impact on the business of 182 threshold</b>	<p>It would be totally impossible to reach this 182 day target as the season is so short and the rural location we are in is a low tourism area. We are not in Pembrokeshire where most holiday makers book first. There are not many indoor attractions in our local area and the ones there are: e.g. National Trust Pumsaint Gold Mines do not open until April and close in September. Holiday makers always book the coastal areas first. We are unable to lower our rental rates as this would not cover our high ongoing maintenance costs which are 365 days a year.. Oil Heating, Insurance, outside leisure areas Patio/garden, Hot tub maintenance. As well as recouping our large investment. We are therefore not in the game of racing to the bottom on rental price.</p>
<b>Personal impact</b>	<p>Apart from looking after the holiday apartment, I am my elderly mothers sole full time carer. My elderly mother is 84 (recovering from thyroid cancer and is terminally ill ) She is living full time with us and if this threshold is raised I would find it impossible to reach it as I would not have the time or energy. It would place a huge burden mentally on me and cause a great deal of stress. Like many women self-catering proprietors, we have caring responsibilities and there is an issue of equality here and fairness.</p>
<b>Turnover</b>	<p>Turnover 2019 Income only =£6,607 Turnover 2021 Income Only +£15,400</p>
<b>Incremental cost of Council Tax at cost</b>	<p>If we had to pay Council Tax on the Apartment Council Tax Band B = £1,384 year</p>
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	<p>We have Carmarthenshire County Council planning dept approval of Certificate of Lawfulness for a proposed use or development under the Town &amp; Country Planning Act 1990 given to us in June 2016 before we started the work to</p>

	renovate the ground floor. No planning permission was needed.
<b>Any Other Comments</b>	

<b>Business Details</b>	Furnished Holiday Let, Borth-y-Gest.
<b>Short Description</b>	sleeps 5, trading since April 2019
<b>Impact on the business of 182 threshold</b>	Running a self-catering accommodation business part-time, at a lower occupancy level, is a legitimate business choice. It is just as valid as those businesses that run at a higher occupancy level. This draft legislation is discriminatory. It disproportionately disadvantages women and their ability to combine work and caring responsibilities. It will have enormous consequences for women and their opportunity to work. The Welsh Government should have carried out an Equality Impact Assessment, to ensure that this policy and legislation do not discriminate against women or carers.
<b>Personal impact</b>	I am a carer. I have two school-age children, one of whom is disabled with autism and severe learning disabilities. My FHL business allows me to work part-time, in a flexible way that means I can earn an income and meet my caring responsibilities. I have always run my FHL business at a lower occupancy level, to fit around my caring responsibilities and allow us to have a break with my disabled child in the only place familiar enough for her and adapted to meet her special needs. I stand to lose both my ability to work and the only place we can have a break.
<b>Turnover</b>	Turnover 2019/20 - £17,940 Turnover 2020/21 - £10,839
<b>Incremental cost of Council Tax at cost</b>	Council Tax band B - £1456.58 + 100% Second Home Premium - £2913.16
<b>Incremental cost of Council Tax at 200%</b>	200% Second Home Premium - £4369.74
<b>Incremental cost of Council Tax at 300%</b>	300% Second Home Premium - £5826.32
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	Running a self-catering accommodation business part-time, at a lower occupancy level, is a legitimate business choice. It is just as valid as those businesses that run at a higher occupancy level. This draft legislation is discriminatory. It disproportionately disadvantages women and their ability to combine work and caring responsibilities. It will have enormous consequences for women and their opportunity to work. The Welsh Government should have carried out an Equality Impact Assessment, to ensure that this policy and legislation do not discriminate against women or carers. There are many women in Wales who are carers and running self-catering accommodation. These businesses allow them to combine their caring responsibilities with part-time,



	<p>flexible work at an occupancy level that earns them a living and meets the needs of the people they care for.</p> <p>There has been no clear communication from Welsh Government that this new number of nights will retrospectively be used to assess eligibility for SBRR. How are businesses able to comply without warning? This period has started as of 1 April this year. For businesses to have any chance at all, they need warning to allow them to market themselves, streamline their costs, re-evaluate their business model, further diversify if necessary.</p> <p>I have already been trying to maximise my nights as I suspected this was likely. It's putting me under enormous strain, affecting my mental health and ability to care for my daughter.</p>
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<b>Business Details</b>	We have 10 holiday properties in the heart of the Brecon Beacons, Holiday lodges
<b>Short Description</b>	We receive 35,000 visitors staying with us each year who contribute to the local economy as in spending money in the local shops, garages, pubs and restaurants, and visiting attractions. We employ up to 9 people - full and part time and have been trading since 2011. I am currently a Farming Connect Mentor for Tourism Diversification in Agriculture and Organic Farming to encourage diversification on family farms making them sustainable for the next generation but I must urge you to reconsider your current stance on this 182 days threshold which is seemed as an anti-English tax.
<b>Impact on the business of 182 threshold</b>	<p>If this results in a 400% increase in Council Tax will obviously play into question the viability of successful tourism businesses as in coincides with electricity contracts running out at 13p/kw and ending up anywhere between 50 - 60 p/kw adding up to approx another £3,000 a year running costs.</p> <p>If these astronomical costs are placed onto our customers then welsh tourism will be effectively closed for business.</p> <p>We have very large business rates on top of this horrendous business tax</p> <p>We have several planning restrictions on our properties denying us to live in them full time</p>
<b>Personal impact</b>	
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	

<b>Any Other Comments</b>	The likelihood of people selling days and weeks off for a price of £1 to reach your 182 day threshold is very real and will only downgrade the whole visitor experience to a race to the bottom in comparison to our 5* visitor experience that has taken us 10 years to establish
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<b>Business Details</b>	We are 1 large commercial holiday let which sleeps 20 with a barn conversion on site for either the owner or manager in Llandysul, Ceredigion.
<b>Short Description</b>	We have planning restrictions on the barn so we can't let it. We have been trading for 3 years however it has been a commercial business for 40+ years. We live in an extremely rural area which puts off some people booking since it takes too long to travel to us for a 2-night stay.
<b>Impact on the business of 182 threshold</b>	<p>Our prime market is families because our property is so large, Schools have around 13 weeks of holiday each year which amounts to 91 days, so the new threshold is double what we were selling in year 1 of our business. Over the last 3 years we've struggled to increase our occupancy to 117 days so far this year, we have managed to do so by paying more for marketing from our main 3rd party, which also eats into our profit. Year 2 we didn't have any bookings in January, February until the end of March. We struggle to get weekend bookings due to our rural location. For us we have absolutely no chance of getting 182 nights lets and as a young family ourselves we are mortified we would have to put our business first over our own holidays/lives because we have to try and meet this insanely high threshold.</p> <p>Tourism is so important to Wales like other rural locations so it's really hard to understand why the government would sabotage so many legitimate businesses. The point of having your own business is to have freedom of choice, even if it is possible, nobody is able to sell 182 days back-to-back to reach accomplish the 182-day criteria so it's understood that these will be spread over the year. If we would have wanted a situation where we are controlled to this level we would go back to working for a large commercial corporation where at least you are guaranteed 5 weeks paid holiday, whereas this situation we are guaranteed no unpaid holidays.</p>
<b>Personal impact</b>	For us being moved from Business rates to Council Tax would mean no family holidays and we wouldn't be able to afford to maintain the property or refurbish it. If our business ceased to be commercial, the value and saleability of our property would most definitely be effected in a negative way. We could find ourselves not being able to afford our bills and unable to sell our business, because technically it would no longer be a business. We have spent thousands of pounds upgrading our property to be compliant for the fire officer, new L2 fire alarm system and new fire doors. We firmly believe if you have a property in Wales not only will it

	devalue but people will be less likely to live here or want a business here, and rightly so. If this move happens, we would definitely consider moving away and probably out of Wales, why would we want to support a Government/Council who clearly do not appreciate what we are trying to do, who we feel we are fighting every step of the way.
<b>Turnover</b>	Our turnover in 2019 was £46K of which £36K is running costs and 2021 was £52K without doing any refurbishment.
<b>Incremental cost of Council Tax at cost</b>	Council tax would be £4,099 on top of the £1,562 we pay for the barn. Our business rates are £2,239 plus the barn, so it would double in cost.
<b>Incremental cost of Council Tax at 200%</b>	£8,198
<b>Incremental cost of Council Tax at 300%</b>	£12,297
<b>Planning Permission restrictions</b>	Yes we have planning restrictions on the barn, we can't live anywhere else.
<b>Any Other Comments</b>	

<b>Business Details</b>	a Partnership Self-Catering holiday business in Gwynedd.
<b>Short Description</b>	Holiday cottage, two apartments in main house and one static caravan for visiting family relatives and dear friends from the U.K. and the U.S.A.
<b>Impact on the business of 182 threshold</b>	The writer cannot believe the proposed 182-day threshold proposed by Gwynedd Council. Gwynedd Council should have performed a 'RISK ANALYSIS' process prior to making this proposal mandatory to all multi-unit self-catering businesses in Gwynedd! The writer is of the opinion this Gwynedd Council proposal will cause us to cease trading due to haste and thoughtlessness to tourism in the Self-Catering industry in Wales. Our business was once home to the Chief Treasurer of the Slate quarries in 1836, as well as a number of Slate Quarry Workshop Managers before closure of the Dinorwic Slate Quarries in 1969. In 1970. It was then used as a B&B. Shortly after it was used by the CEGB as the store for small tools and the home for the Chief Security Officer during construction of Electric Mountain. After that project ended, it was dormant for approximately two years. It was then purchased by a couple who, in the writer's opinion, had no experience in running a business nor repairing any deterioration to this historic building. The present owners, who purchased it in 1996, stand to lose everything they put into restoring and renovating the exterior and interior of this building and its Coach House cottage and business built up over the past 25 years. The owners are in the final stages of renovation, so this news is a real 'Body Blow'.
<b>Personal impact</b>	Personal Impact – One word – Devastated! We have worked diligently and tirelessly restoring the past abuses these two historic buildings have undergone. One can only foresee doom and gloom and fear for our future. The owner is now

	80 years old and his wife, is 76. This places us in an invidious position. One has never heard any political person use the term 'Risk Analysis' to identify the potential consequence/s of an action before commencement of said action.
<b>Turnover</b>	Gross Turnover for f.y. ending 05/04/2019 was £42,439. Gross Turnover for f.y. ending 05/04 2021 was £11,551.
<b>Incremental cost of Council Tax at cost</b>	We pay council tax for owner's accommodation unit (£1,240.90) and business rates for holiday lets (£ 2,350). Best guess for Council Tax for owner plus 3 units (Owner £2481.18; Peris £1,080; £1375; Coach House £1175 – Total = £6011. Best guess for Council Tax for owner plus 3 units (Owner £3722; Peris £1,620; £2,750; Coach House £1762.50 – Total= £8250.70 We are open 12 months, however may close down one accommodation for re-decoration or renovation.
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	We have two rural holiday cottages on the NorthPembrokeshire coast at Dinas Cross
<b>Short Description</b>	We began trading 8 years ago with one 2 bed cottage and expanded the business to include a 1 bed cottage 4 years ago. The two bed cottage has planning consent for use only as a holiday let and is not to be occupied for a period exceeding four weeks for any single letting.
<b>Impact on the business of 182 threshold</b>	The letting season in this part of Pembrokeshire only runs between Easter and late September/early October with ad hoc bookings in the shoulder months outside of the main season. Since we began trading, we have had approx. 50% occupancy at Christmas and New Year. To achieve a lettings threshold of 182 days per year the cottages would need to be virtually full for the whole of the "main season" something that we have not achieved in the eight years we have been trading. We use an eminent agent to market the properties on our behalf and yet, excluding the Covid year of 2020, the average number of days let across both cottages since we began trading is under 170 days per year. It is worth noting here that the introduction of a Tourist Tax would make Wales less attractive to potential visitors thereby compounding the already detrimental impact a 182 day letting threshold would have on the tourism sector in Wales. Profit margins in this sector are not excessive especially after taking account of the considerable time invested by owners in cleaning, maintenance and the general logistics associated with owning and running a small holiday

	let business such as ours. If an absolute 182 day threshold is implemented our annual profits would reduce by approximately 12% for every 100% of council tax that would become payable. If a 300% levy is introduced a 36% drop in profits would not be sustainable and as such, we would actively investigate other potential usage of the cottages and/or look to dispose of the business either in whole or in part.
<b>Personal impact</b>	
<b>Turnover</b>	Turnover in calendar year 2019 £47,200 Turnover in calendar year 2021 £48,250
<b>Incremental cost of Council Tax at cost</b>	Council tax liability at 100% £2,990
<b>Incremental cost of Council Tax at 200%</b>	Ditto 200% £5,980
<b>Incremental cost of Council Tax at 300%</b>	Ditto 300% £8,970
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	A Coach-house in Fishguard
<b>Short Description</b>	The property overlooks Lower Fishguard. It is available to rent to holiday makers for 52 weeks of the year, it has been available through Coastal Cottages of Pembrokeshire for 39 years.
<b>Impact on the business of 182 threshold</b>	I am a retired firefighter and my wife a retired State Registered Nurse the income from the holiday let supports our pensions to have a better quality of life.
<b>Personal impact</b>	
<b>Turnover</b>	Turnover 2019-2020 £6190, 2020-2021 £8764.
<b>Incremental cost of Council Tax at cost</b>	Council tax 2022-2023 rateable value £1700-00 charge for period £909-50
<b>Incremental cost of Council Tax at 200%</b>	At 200% charge for period£1819.
<b>Incremental cost of Council Tax at 300%</b>	At 300% charge for period £2728-50
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	A single holiday cottage
<b>Short Description</b>	My wife and I have been operating a single holiday cottage for the last 10 years.
<b>Impact on the business of 182 threshold</b>	The ability to make the 252 days available is obviously easy, but the proposed 182 days actually let requirement would be far more difficult to meet. In our experience the main holiday season runs from the beginning of May to the end of September, which is a total of 153 days. This means that a

	cottage needs to be fully booked for the whole of the main season plus a further 29 out of season days simply to meet the minimum requirement. In the event that we were unable achieve the No. of let days required, especially in a bad season, and thus being removed from the Business Rates Register it would dramatically affect the viability of our business.
<b>Personal impact</b>	From a personal point of view my wife and I are retired and rely heavily on our income from the cottage to supplement our state pensions. In the event that our cottage was from the Business Rates Register was rated for Council Tax it would make our lives very difficult financially.
<b>Turnover</b>	Our gross turnover for the last two complete years was £16543 in 2019 and £16400 in 2021.
<b>Incremental cost of Council Tax at cost</b>	Although we are currently on the Business Rates Register our cottage is rated as band c for Council Tax, which in our area of Ceredigion is £1592 per annum. In the event that our cottage was removed removed from the Business Rates Register by the Council and became liable for Council Tax as a second home at any level of the proposed premium of up to 300% would result in us having to pay a substantial amount. For example: Band c = £1592 @+100% = £3184.
<b>Incremental cost of Council Tax at 200%</b>	@+200% = £4776
<b>Incremental cost of Council Tax at 300%</b>	@+300% = £6368 All of the above examples would reduce our net profit considerably.
<b>Planning Permission restrictions</b>	A further complication from our point of view is that our cottage is a converted barn which only has planning permission for holiday accommodation and is not allowed to open from 10th January to 28th February each year.
<b>Any Other Comments</b>	If our cottage was removed from the Business Rates Register and became liable for Council Tax, at any premium rate, we would have little alternative but to apply for change of use, remove ourselves from the tourist industry and let the cottage on the domestic market.

<b>Business Details</b>	Holiday let in New Quay in Ceredigion. This is rented out for most of the year, I also use it for occasional family breaks.
<b>Short Description</b>	The property is a 3 bedroom terraced house in New Quay which is a small coastal town in Ceredigion. The local economy is largely based around tourism.
<b>Impact on the business of 182 threshold</b>	The impact of my business of a 182 day letting threshold is that it will be extremely difficult to achieve and I will then have the difficult choice of whether to continue letting out the property if it becomes subject to Council tax. I currently actively market the property on two popular websites. This

	<p>has been successful in obtaining bookings during school holidays and for short breaks out of season and last year the property was let out for approximately 60% of the available time. However, it will be very challenging to attain this level of bookings on a consistent year on year basis (last year the market was extremely buoyant due to COVID restrictions on foreign travel). Out of school holidays most guests are looking for short stays - this is the same for other seasonal businesses such as a B &amp; Bs and hotels which would also struggle to achieve the same threshold at full occupancy. It is worth noting that we price competitively and our guests are not usually especially wealthy. Most of guests are ordinary couples and families from Wales and the Midlands / North England who want to explore the Welsh coast but have a preference for self-catering cottage accommodation over alternatives such as hotels, caravans, etc. If we have to put prices up we will lose this market and these people will lose the option of affordable accommodation and will almost certainly look to other parts of the UK.</p> <p>The impact of the proposed changes is that we will have to consider if we can continue to provide a holiday let at the property. The 182 day threshold is extremely challenging and is at the very maximum of the occupancy we could possibly achieve. If we cannot achieve occupancy at this level we will have to pay Council Tax which would increase our costs by at least £2,500. As we are a 'break even' business there is no way that we could fund this except by increasing rental prices by an equivalent value to cover costs. This would make the property unaffordable to many of our current guests who are ordinary couples and families who would almost certainly opt to holiday elsewhere.</p> <p>The impact of these changes would also be felt elsewhere in the local economy. There would be a loss of income to the network of local businesses we contract with who include a cleaning company, a maintenance company, a gardening company, a holiday rental company and hot tub maintenance. Our guests spend money in local pubs, restaurants and on tourist services such as boat trips, equipment hire, etc.</p>
<b>Personal impact</b>	
<b>Turnover</b>	<p>Our total turnover in 2021 was just over £20,000. We just broke even at this level as our fixed costs (mortgage and utilities) are £9,500 per annum, variable costs (cleaning, linen and hot tub) were £7,000 and we invested £3,000 in the property which included a new boiler and repairs to the hot tub.</p>

<b>Incremental cost of Council Tax at cost</b>	£3000
<b>Incremental cost of Council Tax at 200%</b>	£4800
<b>Incremental cost of Council Tax at 300%</b>	£7200
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>As a final comment, as Welsh property owners and Welsh language speakers we do not oppose measures to support local communities or to protect the Welsh language. There are many things which can and should be done in this regard including building affordable housing in rural areas with covenants to ensure that they cannot be sold on outside of the community. In our view Welsh Government needs to strike a balance and to recognise that the tourist industry is the lifeblood of rural parts of Wales and has revitalised a number of towns and villages which had formerly become extremely depressed. The tourist industry brings huge benefits to areas where it would be difficult to attract alternative forms of investment due to the low population density and poor transport infrastructure. We recognise that there is a problem with vacant properties resulting from second home owners who do not let out their properties to any significant degree. However by setting such high occupancy thresholds, the current measures will not address this and will instead penalise owners who are using their properties to attract tourism. The likely outcome is that many businesses will become uneconomic and owners will be forced to sell. It is unlikely that many of these properties will be go back into the local community, the more likely outcome is that they will be bought up by wealthy investors from outside of the community who are unlikely to be deterred by higher Council tax rates. This will result in more empty properties and a loss of tourist revenue to local communities.</p>

<b>Business Details</b>	A Beach bungalow in Anglesey, N Wales
<b>Short Description</b>	I have spent in excess of £50,000 on repairs to the property and on internal furnishing and decoration in order to be able to have a high quality tourism offering. Much of the money was spent externally where the previous tenants have allowed the grounds surrounding the property to fall into disrepair and so causing an eye sore for the neighbouring properties. I have carried out this work myself over the last year or so and am just about to embark on letting the property out for the first time this season.



<p><b>Impact on the business of 182 threshold</b></p>	<p>As it currently stands, I am paying the Isle of Anglesey Council a 100% surcharge on Council Tax for the property – ie £4,500 per annum. As the property is new to market, I obviously do not have any existing “letting nights” which I can use to apply for Business Rates. Moreso, Benllech is a coastal village – known especially for it’s golden sandy beach, the type of client attracted here are generally families with children and multi-generational holiday makers whereby the grandparents, parents and children can all enjoy a safe and comfortable environment once or twice a year. Because of the demographics of the holiday maker type, and due to the fact that there are less than 100 school holiday days (excluding Christmas when it is too cold to use the beach) it seems practically impossible for me to be able to consistently achieve the 182 letting nights threshold in this location year on year. Even based on a generous estimate of 85% occupancy in ALL school holidays and 25% in low season, this still only gives me 160 nights. For me to achieve the proposed minimum, I would need 100% of school holidays booked and 30% occupancy for the remainder of the year. So in February for example, is it realistic to expect to be booked for the half term week plus one other week in a seaside resort where the majority of shops are closed until at least March (if not Easter) and there are no indoor facilities other than local leisure centres? The Government must understand that there cannot be a ‘one figure fits all’ approach to the overnight stay requirement as places like Capel Curig, Betws y Coed, Brecon Beacons, Llandudno etc are year round resorts and not seasonal like the family beaches on Anglesey.</p>
<p><b>Personal impact</b></p>	<p>The impact of the proposal is devastating to me personally. I have tried for many years to provide a home for families by offering the property as a Shorthold Tenancy. However as previously mentioned, changes in tax legislation, and neglect of the property has resulted in me deciding that I do not wish my property to continue to be abused in this way. In addition, whilst I completely agree with the Rent Smart Wales legislation in order to ‘weed out’ rogue landlords, it does seem to be the genuine landlords who are hit the hardest whilst the rogue ones continue to operate under the radar. In my opinion, Welsh Government have lost sight of the fact that not all landlords are wealthy multi-property landowners with little regard for their tenants. I own the one single rental property (which was my former home) and due to me being transferred away from the area with my job, the property became a Rental by default as I did not want to cut ties with my home village by selling it at the time and there was an element of uncertainty about my job move. Upon my return, I was in a fortunate position to be able to purchase another property as my main residence. However, I have</p>

	<p>lost over 8 months in rent from tenants and have been unable to evict them due to existing legislation – despite me having a mortgage on the property which I have to pay or face repossession. It is completely unfair on people like myself who try and work hard to maintain a home for myself and a further home for a tenant only to have all tax relief withdrawn, be faced with increasing maintenance costs due to Rent Smart Wales, and be told that I cannot evict a tenant despite their non-payment – all the while I am expected to pay the mortgage to keep a roof over the tenants head. Is it any wonder people like me are turning to the Holiday Let market whereby the property can be inspected on a weekly basis and there is very little chance of an owner having to take eviction action?</p>
<p><b>Turnover</b></p>	<p>As I am a new business, I do not have any previous year figures to hand. I would like it known and clarified that the %age figures spoken about are in addition to the existing Council Tax – therefore 300% is FOUR times the amount etc. Many people are unaware of this. Currently the figures are:</p>
<p><b>Incremental cost of Council Tax at cost</b></p>	<p>I have been content with paying the 100% premium on Council Tax because as a local resident, I do see the effect first hand of empty properties in the Winter Months. I also do not want to be seen to be using a ‘loophole’ to avoid this surcharge and believe that all businesses should contribute in some way in the form of Council Tax or Rates. I am genuinely friends with the owners of neighbouring properties to my holiday let and I have an absolutely clear conscience when discussing the issue of Council Tax with them. However, these new proposals change all that. Failure for me to be able to achieve the 182 letting nights will result in me facing a Council Tax bill of £9,000 per annum should Isle of Anglesey Council decide to impose the 300% surcharge. As they currently impose the maximum surcharge, there is no reason to believe why this new percentage might be treated any differently. This is an obscene amount of money equivalent to a Business Rateable Value of £16,500 – over three times the amount of the village fish and chip shop. The effect of this surcharge will not result in me ‘selling the property to a local buyer’ as I already am a local resident. Nor will it see me changing back to a STA. As is being discussed on many holiday let property owners forums, people are simply going to find a way around this charge. Who dictates the cost per night for example? It would be far more cost efficient to ‘make up’ any shortfall in the number of letting nights by ‘letting’ them at a cost of £1 per night – so by effectively giving someone an almost free holiday could result in me qualifying for Business Rates, therefore meaning that I save £9,000 per annum in Council Tax. There is nothing illegal about this and it could be seen as good marketing practice.</p> <p>Band D – Standard Cost £2,276</p>

	100% Surcharge £4,552
<b>Incremental cost of Council Tax at 200%</b>	£8,328
<b>Incremental cost of Council Tax at 300%</b>	£9,104.
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	In my opinion, the Government and Local Authority should focus their efforts on people who are claiming the 25% single occupancy reduction in Council Tax – there are no controls and checks in place to prevent someone from registering for this discount and there is no public register to enable people to check who is claiming it. I know of several holiday homes where the owners live outside the area who claim they are single occupants of their holiday home. In the road where my property is, whilst I am paying double council tax, three other properties pay nothing as they are on business rates and two more pay 75% council tax claiming they are single occupants. In addition, why is there not more done to prosecute people who use their “business holiday let property” for personal use? Rather than persecute the genuine Holiday Let Owners by imposing unrealistic overnight stay figures the Local Authority would generate more revenue by ensuring that existing rules are adhered to correctly. The Holiday Let debacle is simply an easy crowd pleaser in a politically motivated attack on genuine holiday let operators who use their property to supplement their inadequate pensions due to poor employment opportunities in the area.

<b>Business Details</b>	Holiday home at Aberaeron.
<b>Short Description</b>	Bought for the purpose of providing self catering holidays to families . Strictly no pets , enabling families typically all getting together , different generations and enjoying Aberaeron and the nearby regions.
<b>Impact on the business of 182 threshold</b>	Set up since 2015 , and offering accommodation throughout the year. It is always booked for summer school holidays . 6 weeks of the year are guaranteed , then October half term and occasionally one week at school holiday, Easter period. It would not be financially viable to have to pay council tax , on top of all out goings if the number of days was increased. The house is always available but families book the school holiday periods only. The accommodation is available 365 days a year, but bookings are not made constantly. I strongly disagree and disprove the proposal of having to rent the house for 182 days. It is not achievable .
<b>Personal impact</b>	I would have to cease trading as a holiday accommodation.
<b>Turnover</b>	Income for 2019 £ 10,477 Income for £2020 £10,630

	This does not include any costs .
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Self-catered holiday cottage for 9 guests in Goodwick.
<b>Short Description</b>	We run a self catering holiday cottage in a rural setting between Tregwynt and Stumble Head which has been in my family since the mid 1950s. Our business has been operating 17 years. Our house was redundant stables and sheds and we spent £250,000 in 2004/5 converting this into a habitable dwelling for 9 guests. We entirely used local contractors and sourced all our fittings and furnishings from local businesses. We have just put in a £35,000 ground source heating system using local contractors. A great deal of effort and hard work has gone into building up our small business over the years and we continue to source everything locally, giving business to West Wales Holiday Cottages, a caretaker year round, gardener, maintenance trades and contractors and we and all our visitors spend money in the area during their stay in the shops, restaurants and many local activities.
<b>Impact on the business of 182 threshold</b>	If the proposed 182 day threshold for business relief was to be imposed it would have a huge impact. While we are happy to make the house available for most of the year (apart from maintenance weeks January to end March) in reality there is very little off-season demand as we are in such a rural setting and it is a family sized property. We manage to let a maximum of 15 weeks a year and try to keep our prices as reasonable and competitive as possible. The proposed changes to council tax and the removal of Business Rates Relief would result in us having to hugely increase our prices and this would likely be unviable.
<b>Personal impact</b>	These figures are eye watering and for a property in such a rural and very exposed area which is expensive to maintain and run. Our business would be unviable with a knock on effect to many small businesses and local people who have worked hard to look after the property and support their families and welcome any extra income they can get. We would have to seriously consider it's future and probably be forced into cutting corners, maintaining it to a lower standard and even closing our business as with all the wear and tear our income wouldn't begin to cover our ever increasing costs.
<b>Turnover</b>	April 2019 - April 2020 £15,827

	April 2020 - April 2021 £10,492 (several cancellations due to Covid)
<b>Incremental cost of Council Tax at cost</b>	Our standard Council Tax would be £1,578 pa without Business Relief.
<b>Incremental cost of Council Tax at 200%</b>	200% Council Tax = £3,156
<b>Incremental cost of Council Tax at 300%</b>	300% Council Tax = £4,734
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Furnished holiday let, semi detached property in village location of Morfa Nefyn, Pwllheli, Gwynedd.
<b>Short Description</b>	Half a mile walk from the beach. Small estate of mixed semi detached houses and bungalows built in 1981 bought by my Mum from new in 1982 (with money inherited from the sale of her deceased Mother's property). Ownership transferred to me in 2006. The house has been a holiday let from when it was first purchased in 1982.
<b>Impact on the business of 182 threshold</b>	A reduction in off peak letting charges to try and fill nights during off peak season and compete with other properties in the area in a similar situation. Increasing the letting nights will have a knock on effect of wear and tear on the property resulting in an increase of prices during peak season to recoup costs. My gardening, cleaning and laundry costs are fixed whatever the season, therefore my profit margins will be reduced. I regularly make improvements to the property to keep up with the high standards guests require and spend money within the local economy using local builders and suppliers, this is an area of expenditure I will have to reduce to remain economically viable. There will also be increased electricity costs during colder and darker winter months at a time when electricity costs are sky high and increasing.
<b>Personal impact</b>	The prospect of many sleepless nights worrying if I am going to achieve the 182 nights let and if not how am I going to be able to afford the cost of a potential 400% council tax bill along with the high rising cost of electricity? Maybe ultimately, I will have to sell this property that has been in my family for the last 40 years. We have made friends with local people who live in the area, formed relationships both business and social, supported cleaners, gardeners, suppliers of carpets, plumbers, garden centres, roofers etc.etc. This property is not my only income, I have a job as a teaching assistant in a secondary school in Manchester where I live. I am not rolling in money my income after tax is around £16000 there is no way I can afford to pay a £8000 council tax bill if I do not achieve the 182 days.
<b>Turnover</b>	2019: £7298 2020: £9043 2021: £3639

<b>Incremental cost of Council Tax at cost</b>	100% Surcharge £1926
<b>Incremental cost of Council Tax at 200%</b>	200% Surcharge £3852
<b>Incremental cost of Council Tax at 300%</b>	300% Surcharge £5778
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	One x 2 bedroom Holiday Cottage in Newport
<b>Short Description</b>	Have been letting since bought 20 years ago.
<b>Impact on the business of 182 threshold</b>	This would wipe out the small profit we sometimes make which is always used to upgrade/maintain our 19th Century cottage to the increasingly high standards clients expect. We always use local builders, painters, plumbers and garden maintenance, buy all our material locally and use local cleaners and laundry. It may not be viable for us to continue as a business, if faced with a large increase in local taxes.
<b>Personal impact</b>	The proposed changes could potentially be very damaging to us and it would be doubtful if we could continue letting, which would be a great sadness as we have always let our cottage, and actively promote local shops, enterprises and restaurants to our visitors, who spend money in Newport which helps support the tourist industry, so vital to the area.
<b>Turnover</b>	Year ending 2019 = £10,074 gross. In 2021 =£8,919 gross. FYI projected gross income for 2022 = £16,324
<b>Incremental cost of Council Tax at cost</b>	Council tax @ 100% + £1,526.77
<b>Incremental cost of Council Tax at 200%</b>	Council Tax @ 200% = £3,053.54
<b>Incremental cost of Council Tax at 300%</b>	Council Tax @ 300% = £4,580.3
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Cottage in Little Haven
<b>Short Description</b>	Single 2 bed 160 year old holiday cottage, renting through Coastal Cottages of Pembrokeshire since 1998. Seaside location. Cottage has no parking although we provide one permit, garden half way up the hillside into which it is built, and relies totally on electricity for power.
<b>Impact on the business of 182 threshold</b>	Initially, not so much since much of this year is already let. We have spent

	<p>upwards of £50,000 over the past few years, in improving the cottage to make it more attractive to visitors, using local stoneworkers, decorators, furniture makers, gardeners, shops and building workers. This year (2021-2022) we shall make a loss. Were we not able to achieve 182 days commercially let, then this improvement would cease since updating will not be viable. Unless rents are increased substantially to cover the increased costs of running the business, the quality of the accommodation and the property will deteriorate, to the detriment of the tourist draw and experience. This would be unfortunate since Pembrokeshire tourism is competing in a very demanding market.</p>
<b>Personal impact</b>	<p>Completely disillusioned. If the Welsh Government is trying to damage the tourist trade, this is a good way to do it. Why should we care about contributing to the local economy? We shall feel that the Welsh Government is hostile to tourism, doesn't care about the quality of the accommodation offered to its guests, and is intent on squeezing every last penny from people who are trying to market and support the local economy, but who gain little from local services.</p>
<b>Turnover</b>	<p>Tax year 2019 - 20: £16,123. Tax year 2021 – 22: £18,206</p>
<b>Incremental cost of Council Tax at cost</b>	<p>£1556.51</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>£3133.02</p>
<b>Incremental cost of Council Tax at 300%</b>	<p>£4699.53</p>
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	<p>Semi-detached cottage attached to grade listed building in coastal area of Gwynedd</p>
<b>Short Description</b>	<p>Close to main road down Llŷn peninsula. Operating for 4 years. Advertised via Holiday Cottages.</p>
<b>Impact on the business of 182 threshold</b>	<p>Whilst the cottage achieves the 182 day it is unclear whether this will be achieved going forward due to unknown impacts from the change in legislation and the resultant changes to the FHL numbers. If the property failed to achieve the target and were to be subject to council tax, then it is very likely the business would close. We currently invest significantly into the local community through cleaning staff, maintenance staff and purchasing, so this income will be lost to the area along with tourist expenditure.</p>

<b>Personal impact</b>	The property was built by my father in the late 80's, and we plan to run it as a FHL for the foreseeable future. As an income it is an important part of our retirement plans, since whilst the income is modest (increases in cleaning costs due to COVID and energy prices have reduced it), it is still a significant element. The council tax even at 100% extra (which is what it currently is in Gwynedd) would very likely put us running at a loss.
<b>Turnover</b>	Gross bookings: 19/20 - £19,800, 21/22 - £23,100. Outgoings in staffing and maintenance/renewal take up about 85% of this income.
<b>Incremental cost of Council Tax at cost</b>	I believe we are either band C or D, so tax for 22/23 in Clynnog Fawr is either £1,676.72 or £1,886.31. Planning on Band C (I remember the tax being about £1,450 in 17/18), as a second home the cost would be £3,353.44
<b>Incremental cost of Council Tax at 200%</b>	At 200% - £5,030.16
<b>Incremental cost of Council Tax at 300%</b>	At 300% - £6,706.88
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	My flat is run as a short let holiday property business, available for 365 days a year. It is marketed and managed by Coastal Cottages.
<b>Short Description</b>	This flat is not big enough for long term residential occupation but is perfect for short term lets. It is part of a historic Grade II * Listed Building, which rises from the sea wall at the bottom of Pier Hill, Tenby, and features in almost every tourist poster for South Wales. It is a small 3 bedroom apartment, with a sitting room and kitchen overlooking Tenby Harbour. It has been a let holiday property since at least 1919 when my Grandmother took her children to stay there and was bought by my family in 1972 and acquired by me in December 1998 since when I have been in receipt of SBRR, as had my mother before me. It is entirely unsuitable for permanent accommodation.
<b>Impact on the business of 182 threshold</b>	The impact on my business of the 182-day threshold would mean that there would be very much less time for interior and exterior maintenance, which because of being listed and weather damage caused by the proximity of the sea/wind makes it extremely expensive to maintain. If I could not meet the 182-day threshold I would lose the SBRR and would be liable for Council Tax, there is a serious risk that I would not be able to afford to look after this wonderful and much loved building to the required standard and would anyway be forced to raise the rent possibly beyond the level which the market could bear. Tourists are the life blood of this part of Wales. The



	prosperity of the area is almost entirely due to revenue from holidaymakers staying in short term lets like mine, without whose money the local economy would suffer grievously. As you will see from my answers to points 6, 7, 8 and 9, if I no longer benefitted from the SBRR, but had to pay Council Tax I would not be able to make ends meet without raising my rents.
<b>Personal impact</b>	The impact on me is that we as a family would not be able to use the flat, where I have holidayed since I was 12, as much as we would like. A 182-day threshold is far too high and for most flat owners, unachievable. For the year Jan – Dec 2019 it was let for 22 weeks, which is the norm. In Jan – Dec 2021 it let for 28 weeks, much more than average because of Covid and people not going abroad. Although available in the winter months there are fewer lets, perhaps a couple of short lets and one week a month for obvious reasons.
<b>Turnover</b>	My Gross turnover for 2019 was £21,751.00, and £4,246.13 Net. For 2021 it was £29,387.00 Gross and Net £5,862.48. As you can see, I do not make much profit and the small income I do make from letting, is used for the maintenance of the building and replacement and repair of fixtures and fittings.
<b>Incremental cost of Council Tax at cost</b>	This is impossible since I have never paid Council Tax on the flat, but I estimate it would be in Band D i.e. £1,250.
<b>Incremental cost of Council Tax at 200%</b>	Doubled it would be £2,500.
<b>Incremental cost of Council Tax at 300%</b>	Trebled it would be £3,750
<b>Planning Permission restrictions</b>	My flat is limited by its unsuitability for residential letting (see paras 2 and 3 above). We are not aware of any planning restriction but assume that permission would be required for any change of use.
<b>Any Other Comments</b>	

<b>Business Details</b>	a 4-bedroom cottage with one on suite bathroom with two reception rooms located in the centre of Newport, Pembrokeshire
<b>Short Description</b>	The cottage has been let out as a holiday cottage since 2006.
<b>Impact on the business of 182 threshold</b>	Increasing the threshold to 182 will mean that we will not meet the minimum requirement and have to pay the penalty council tax on the property even though we make the property available to let 356 day per annum. Since we purchased the property in 2006, we have only once achieved more than 182 days letting, which was in 2021 due to Covid 19. The average for the last 7 years has been 148 days. We would love to rent it for more days, but the

	<p>business is seasonal and as a four-bedroom cottage we tend only to get rentals in the high seasons and holidays. We do not attract the walkers or couples in the lower seasons. If we have to pay a higher rate on council tax, then it will force us to increase our rental prices, to try and attract a reasonable income against the risks and costs of letting the property. We will also not accept rentals where the revenue of the rental is marginal against variable cost.</p> <p>Higher pricing and reduced renting I believe, will see a reduction in the yield which will mean less expenditure in the shops and restaurants in Newport by visitors to the cottage.</p>
<b>Personal impact</b>	<p>It is available for letting 365 days per year and is not a family holiday or second home. We live in Newport within one mile of the property. The profit (income less expenditure on the property) generated from letting the cottage supplements our pension income and is not just about covering the cost of a holiday home. We will have less personal disposal income. Such an unreasonable policy will undermine our enthusiasm and goodwill to give our time freely to the local community and the voluntary work that we do will be reduced as will our expenditure and support of local shops and restaurants.</p>
<b>Turnover</b>	(Sales)      2019    £15,294      2021    £24,193
<b>Incremental cost of Council Tax at cost</b>	£2568
<b>Incremental cost of Council Tax at 200%</b>	£5134
<b>Incremental cost of Council Tax at 300%</b>	£7701
<b>Planning Permission restrictions</b>	Self-Catering holidays and property use
<b>Any Other Comments</b>	

<b>Business Details</b>	<p>a two bedroomed cottage in a hamlet in North Wales We have one, small holiday let in Bontnewydd, St Asaph.</p>
<b>Short Description</b>	<p>This FHL has been trading since 2011 following the conversion from a public house. It is in a rural location in a small hamlet outside St Asaph. We purchased the business in 2015. The property had been on the market for at least 12 months, alongside next door – which was also an FHL. The purchase price, at that time, was within the affordable price category but there was no local interest. Next door – is now residential, and was purchased by a lady from Warrington – and not by locals despite the affordable price category. We are not limited by any restrictions as to when we are able to let our property, and it is available all year.</p>

<p><b>Impact on the business of 182 threshold</b></p>	<p>There is a very real possibility that we may have to stop trading. We have recently retired from NHS and aircraft engineering and have been concentrating on improving the quality and facility for guests, our reviews have always been extremely complimentary. All the work undertaken in our cottage is contracted with locals, e.g., recent installation of new log burner at £1500, local replacement of fence panels, local chimney sweep, local installation of new boiler, painting and decorating by local tradesmen, refitting of a new bathroom, building of an external shed. The impact upon the local economy of the spend by our guests can also not be underestimated as we are aware a lot of them utilise hostelrys for meals out, also utilisation of local supermarkets and preference for local products e.g., local bread factory production. The impact upon numerous local tourist amenities/attractions must also not be underestimated e.g., entrance to castles, both near and far in North Wales. Alongside the possible introduction of the tourist tax, we have very real concerns for the future of tourism in North Wales, the feeling being that tourists are no longer welcome. Traditionally tourism has been a major stronghold in the North Wales economy and this introduction of 182 threshold and the inevitable reduction in FHLs will have a major impact on the North Wales economy. This 182 is also compounded by increase in cost of living, and tourism tax, we will have to put prices up in order to meet this, which will deter bookings, causing an ever-decreasing spiral for the business (and also other businesses operating in Wales).</p>
<p><b>Personal impact</b></p>	<p>We have recently taken early retirement from NHS and Aircraft engineering, in order to improve our quality of life, having experienced stressful jobs (including two years during Covid). Running the FHL is necessary to support our income. In spite of all year long availability and increased promotion /advertising we know that the 182 threshold is not realistically achievable as an ongoing level. These 182 thresholds will introduce additional stress to ourselves and our business. The possibility of introduction of 3 times council tax could actually exceed our income. If we do not achieve the 182 any profits, we make will be taken away by the increased council tax, this principle is not tenable for any kind of business.</p> <p>Running a small single property FHL profits are not high, and to eat into these profits make it unviable. We had a long-term plan to run a holiday let during our retirement and the emotional impact of a failing business - through no fault of our own - (previously successful) should also not be underestimated. If this 182 goes ahead it will cause financial difficulties during our retirement.</p>
<p><b>Turnover</b></p>	<p>2019 – our income was £ 5085 before any expenses and tax (occupancy 112)- this is pre covid and demonstrates that an</p>

	ongoing 182 is not consistently achievable. Please note this wasn't a good year for us - this figure is pre-expenses – and isn't net profit. 2021/2022- we estimate income to be £12000 (occupancy 242) – no one able to travel abroad due to Covid. This figure is pre-expenses – and isn't net profit
<b>Incremental cost of Council Tax at cost</b>	100% Council Tax £1498
<b>Incremental cost of Council Tax at 200%</b>	200% Council Tax £2996
<b>Incremental cost of Council Tax at 300%</b>	300% Council Tax £4494
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	a Holiday Cottage in Llanfaelog, ANGLESEY
<b>Short Description</b>	1 multi-dog friendly holiday cottage, 4 bedrooms, sleeping 7. Been running as a successful business for a good 6 years, with a high proportion of repeat guests. Rural, but on the edge of Rhosneigr which is a very popular coastal holiday hotspot. We let predominantly to couples with lots of dogs despite the 4 bedrooms as we do a low occupancy discount to attract bookings outside school holidays, with unlimited dogs staying free. We are priced low for our size, but can only guarantee 1 off-street parking space which limits the number of adults we can accept, and therefore the price I feel comfortable charging when it's likely paid by a single household.
<b>Impact on the business of 182 threshold</b>	Pre-pandemic, we easily would hit this. There is a very high demand and we have built a solid reputation. However, if we didn't accept dogs, or didn't do a 10% discount for couples, or didn't have our loyal repeaters, we might struggle more. Certainly if we were in a less well-known area, we would. I am aware we are in a very fortunate position, but equally aware how many aren't. Post-pandemic, 182 days is more of a stretch, however. Increased living costs may impact number of bookings as people have smaller disposable incomes, we will need to increase winter prices which may make us less attractive than small properties that cost less to run. And if everyone now has to reach 182 days, who knows if there are enough guests to go round? Also, the proposed tourist tax may reduce overnight visitor numbers to Wales. There isn't an infinite number of guests. I believe what will happen is the same number of bookings (likely fewer in the next year or so) but spread across more properties - meaning those used to well-exceeding 182 will lose a chunk of expected income to those who didn't need it and were

	getting by on a more "part-time" basis. Just as if in the workforce, everyone had to work full time, there would be fewer people employed. This doesn't help anyone.
<b>Personal impact</b>	<p>As our business grew, I took the decision to give up my job to concentrate solely on the holiday let. I handle all admin, advertising, guest-interaction, finances, maintenance planning, cleaner-liasing. I'm basically on-call 24/7 whenever we have guests in. The pandemic and forced closure made everyone re-assess their work-life balance, me included. I want to earn enough, not "as much as possible". If I have a week empty, and I have enough; I don't want to feel I have to scramble to get a cheap booking in just to hit someone else's idea of being a real business. Sometimes I just want a break.</p> <p>As remote owners we schedule in regular maintenance weeks throughout the year, losing a lot of money from bookings we could easily have achieved. We have learned that we can't just hand over to a cleaning company for the spring and summer and expect standards to remain high. We haven't had a real holiday for years as all annual leave is spent at the holiday let deep-cleaning, gardening, doing maintenance, organising tradespeople, organising deliveries of stuff;. Tradespeople often don't commit to a day, so we block off at least a week to ensure work doesn't overrun. As an example, we have 2 weeks blocked off in May. We will be staying. So will look like we're on holiday. Yes, of course we find time to enjoy ourselves, but who works 16 hour days, 7 days a week anyway! I reckon we have about a 50/50 work/downtime split, and much of that downtime is videod and photographed to create advertising content. We will be doing lots of jobs, using the house the withdraw that income from them just so we can earn peanuts</p>
<b>Turnover</b>	£19k, £18k. Pre-pandemic we were heading for £23k, but post-pandemic, priorities have shifted and we usually get about £8k profit, but frequently spend most of it on improvements.
<b>Incremental cost of Council Tax at cost</b>	At 100% £1700 (minus £550 trade waste?)
<b>Incremental cost of Council Tax at 200%</b>	at 200% £3400
<b>Incremental cost of Council Tax at 300%</b>	at 300% £5148. But £6860 if you mean 300% premium (therefore 400%)
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	I let a single detached holiday cottage in a rural location half an hour from the coast in West Wales
<b>Short Description</b>	I have been trading for 5 years. The property is available to let all year and lettings are picking up again after the lockdown restrictions of the last two years.

<p><b>Impact on the business of 182 threshold</b></p>	<p>The impact on my business of the 182 day threshold will be considerable and will involve much more maintenance, cleaning, travelling, paperwork and administration. I have been gradually building up the business over the last five years and have many satisfied customers with return visits and recommendations and am keen to maintain providing a high level of service to all my visitors.</p> <p>I have a good relationship with my local Welsh Advertising Agency and would prefer to continue to support them as my sole agent, but this may not be possible if bookings fall short of the new threshold. This may mean having to advertise with other national Lettings companies which I am reluctant to do.</p> <p>As it is impossible to predict visitor bookings the threshold may be missed by only a few days despite every best effort to let the property and the switch to Council Tax would then make the business unviable.</p> <p>As Covid restrictions have relaxed and more people decide to return to holidays abroad over the next few years, this will have an impact on domestic tourism therefore increasing the threshold next year seems counterproductive.</p> <p>Many of our visitors make use of the local pubs and takeaways and tourist facilities, and there will obviously be a knock on effect on all these businesses if the property has to close.</p>
<p><b>Personal impact</b></p>	<p>The impact on me personally will also be huge, as I am currently without a cleaner due to being let down previously by several local cleaners (including not turning up for a scheduled clean), which means I have to drive a 6 hour round trip each weekend to do the changeover myself. Being forced to meet the higher threshold will mean much more driving, more emissions, and more time spent sitting behind the wheel. Additionally there will be extra costs to be spent on maintenance due to more wear and tear on the property. Due to the age of the property (partly Victorian) with wide solid stone walls etc, a sensitive management approach is key to keeping any potential problems from developing, and short breaks between visitors enables this to happen.</p> <p>I have deliberately kept my rental costs at a very reasonable level in order to encourage families to visit in the holiday seasons, as I understand how difficult it can be to find somewhere affordable for a family holiday. Having to pay a substantially higher Council Tax bill will unfortunately eat into my profits leaving me either having to charge much higher rents which may deter visitors or having to close down the business entirely.</p>
<p><b>Turnover</b></p>	<p>2019-20 was £4655.75 2021-22 £8074.25 (April - April).</p>

<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1753.78
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £3507.56
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £5261.34
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	2nd floor holiday rental apartment, in centre of holiday village, Rhosneigr.
<b>Short Description</b>	Been trading for 5 Years
<b>Impact on the business of 182 threshold</b>	<p>Our business is mainly focused on the spring – autumn months, with very few booking in November to February period (3 months) to include maintenance work, therefore to achieve 182 days in effective 9 months is achievable, but is a big ask.</p> <p>We make an effort to use local companies (change over staff), tradesmen and producers (N Wales). Our welcome basket for guests contains only welsh produce, as a way of putting employment back into the community, as Anglesey and a lot of N Wales is nearly completely dependant on hospitality.</p> <p>Without tourism on Anglesey and N Wales, what employment will those who service the hospitality industry have?</p> <p>We probably just make enough money to cover all our cost. It is a demanding business striving to keep standards high for each visiting guests.</p> <p>If we didn't achieve the 182 days, we would be hit with the Council Tax surcharge, which would mean either significantly increase rents, which guests probably wouldn't pay, or sell the property.</p> <p>We don't feel it is right to have such a high number of 'days letting' threshold, which would penalise this trying to bring income and employment into the area.</p>
<b>Personal impact</b>	We have invested a lot of time, money and effort into the apartment, so that the guests can enjoy a lovely place, in wonderful surroundings. This is evidenced by the fabulous feedback that we regularly receive.
<b>Turnover</b>	<p>CY 2019 - 14.1k</p> <p>CY 2020 - 8.6k</p> <p>CY 2021 – 15.0k</p>
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1,926
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £3,852
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £5,136
<b>Planning Permission restrictions</b>	

<b>Any Other Comments</b>	<p>In the last 3 years, local people have invested heavily in Rhosneigr in Hotels, cafés, convenience store, and in April 2022, 2 new businesses will be opening (Café Notos – coffee shop and Y Parlwr – Restaurant and deli). These businesses provide employment for local people, and service the hospitality industry for holiday makers who come to Rhosneigr for holidays or day trips. If the holiday accommodation goes, there won't be anywhere for holiday makers to stay, and therefore no business or employment for local people.</p> <p>This doesn't sound fair to those people who have invested in Rhosneigr and surrounding areas to provide opportunities for others, and for themselves.</p>
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<b>Business Details</b>	a three bedroomed property in a small Pembrokeshire village.
<b>Short Description</b>	It is It has been run as a business from June 2014. When we bought it, it had been empty for two years. The bathroom needed replacing and external maintenance had been neglected.
<b>Impact on the business of 182 threshold</b>	This is let through an agency and has always been available for let all year, but despite their publicity and marketing resources, has only achieved between 112 to 133 days a year over that period. We did unusually well last year because of restrictions on foreign travel etc and had direct bookings on top of agency bookings. This gave us 156 days plus 14 days we booked ourselves for the same reasons. This exceptional year still puts us below the proposed 182 days. If this meant we would be expected to pay three times council tax the business is no longer viable.
<b>Personal impact</b>	We invested in a holiday let because I wanted to build on the occupational pension I was expecting as it was going to be low due to my being very part time. I was a stay at home mum for many years. Half my current income comes from pension, a quarter from my continuing part time work and a quarter from the business. The figures are low but are significant to me personally. I own the business with my husband but I do all the management of it. All of the profit would be wiped out if we were charged three times council tax. I have worked hard to make the cottage a place people enjoy staying in, to manage it during occupancy and keep accounts for the accountant. I would have been very pleased to have higher occupancy but, apart from the recent exceptional year, there is not the demand.
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	£1250
<b>Incremental cost of Council Tax at 200%</b>	£3,852



<b>Incremental cost of Council Tax at 300%</b>	£5,136
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	2 converted/ renovated barns with grounds, sauna and small lake in Powys.
<b>Short Description</b>	Have been trading since 2008. Together the barns have 12 bedrooms including 10 ensuite rooms. Rural. Specialising in big family get togethers and more recently yoga and meditation retreats. RV 17,000
<b>Impact on the business of 182 threshold</b>	Nights let are as follows: 18-19: 115, 19-20: 158, 20-21: 43, 21-22: 164. I have for many years offered 3 night weekends for the price of 2. Large get togethers and yoga retreats are generally over weekends only. I work hard to get the number of nights that are achieved - more nights will not add any value to my business. They will have to be add on nights gratis, but there will obviously be a cost so will make the business less profitable! I offer extra nights at just over cost already and they are rarely taken up. During 18-19 I only achieved 115 nights - it wasn't from a lack of effort or spend on marketing. It is not easy to keep attracting large groups to rural mid Wales all year around, despite 5 star reviews. Apart from countryside there is nothing else here! I try as hard as I can to let as many nights as I can profitably and have never achieved 182 nights. That says it all really. If I have to pay 300% council tax I will not make a profit, the knock effect to the local economy, including small catering businesses, will be keenly felt. As well as 3 staff losing jobs and myself.
<b>Personal impact</b>	I work all hours as it is. I have 3 regular part time staff and try hard and succeed in providing work for them throughout the year. This I can continue to do if I am making a reasonable living. If not, and with interest rates rising and VAT back to 20%, it will not be worth doing.
<b>Turnover</b>	2019/20: £98K ex vat 2021/22: £134K ex vat. 2021/22 assisted by reduced VAT rate.
<b>Incremental cost of Council Tax at cost</b>	Garth Barns doesn't benefit from SBRR. I don't know what the council tax value would be. Garth Barns RV is £17,000 and is in Powys.
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	No restriction on lettings but sale is tied to my House.
<b>Any Other Comments</b>	

<b>Business Details</b>	Holiday cottage in N.Pembs seaside village
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<p><b>Short Description</b></p>	<p>I have been considering how the proposed changes will affect us. We have rarely let more than 160 days even though the property is generally available 365 day per year. The problem is that the summer peak period (school hols spring and summer) is not enough. We might be able meet the threshold but it's doubtful that we could do so every year. In particular there are years when we do major improvements, for example retiling the roof. Such works are weather dependent and when you plan them it's unwise to take bookings before some time after Easter. Obviously you can't have guests arriving on a building site. If we get tripped up by failing to meet the 182 day threshold, the financial consequences are large.</p>
<p><b>Impact on the business of 182 threshold</b></p>	<p>I am a Fellow of the Royal Institution of Chartered Surveyors and I derive some of my income from let property in Wales including holiday letting. I am responding in a personal capacity. I consider below the Welsh Government's announcement on 2nd March 2022 regarding changing the qualifying rules for Holiday lets and Business rates from April 2023, the 182 day letting rule.</p> <p>I believe the proposals have important repercussions for the whole industry. While the opportunity has been provide by WG to comment on various general proposals to change the regulations for the holiday cottage industry, it seems to me the announcement of this specific rule change has been made without the proper consultation. It is to be hoped WG can be persuaded to modify it since it promises to have damaging consequences. Here is my holiday letting story and the dilemma the proposals present me with.</p> <p>My wife and I purchased a 3 bedroomed detached cottage in Newport in 1997. We have let the cottage as a holiday home since then. We started by handling all the work of repair, maintenance, improvement and letting ourselves. We gradually improved the letability, spending a large sum on a fourth bedroom roof extension in 2001. Around then we began to professionalise the business. We engaged Coastal Cottages of Pembrokeshire as the letting agent, and employ local people to handle change-overs, maintenance and gardening. For the last 15 years, we have employed the same Newport couple for all the routine maintenance and change-over work.</p> <p>Last year, we incurred further capital costs, making a garden room with shower and toilet, and providing an outdoor shower for a wash-off after the beach. We also replaced all the old clay sewers to the property which involved digging up the drive to a depth of 1m and relaying a new hard surface around the house. Next year, provided we get a decent letting income, we'll probably renew the 1930's roof. I want</p>

	<p>the blacksmith in Dinas to make us some new steel garden furniture to match the gates he made a decade ago. We'll need to look at a heat pump too when we replace the gas boiler we installed in around 2000.</p> <p>I mention this schedule of work simply to illustrate the scale of the local services we support.</p> <p>We contrive spend most of the turnover on local services e.g. the letting agent, plumber, builders, gardener, electrician, TV rental, internet services, cleaning and laundry, and on making sure fixtures and fittings are up-to-date. There are two reasons for expending most of the receipts in this way. Firstly it keeps our property in tip-top shape for letting. Secondly we don't really need more taxable income. We are not wealthy but we have modest needs and adequate pensions. Our surplus rental cash goes into the local service economy. That is on top of the money our renting guests spend in local pubs, food outlets etc etc.</p>
<b>Personal impact</b>	
<b>Turnover</b>	<p>CY 2019 - £9,868  CY 2020 -  CY 2021 – £12,977</p>
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1800
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £3600
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £5400
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>I have been considering how the proposed changes will affect us. We have rarely let more than 160 days even though the property is generally available 365 day per year. The problem is that the summer peak period (school hols spring and summer) is not enough. We might be able meet the threshold but it's doubtful that we could do so every year. In particular there are years when we do major improvements, for example retiling the roof. Such works are weather dependent and when you plan them it's unwise to take bookings before some time after Easter. Obviously you can't have guests arriving on a building site. If we get tripped up by failing to meet the 182 day threshold, the financial consequences are large.</p> <p>The standard council tax demand for a house like ours in Newport for the financial year 2021/22 was around £1800. So at 200% we'd pay £3600 and at 300% we'd pay £5400. The latter is close to half the turnover. That would be a disaster in terms of keeping things running as they have been. So what to do? Bear in mind I have said it is genuinely</p>

	<p>challenging to meet the 182 day threshold, year in year out. At the moment my top option is to scale-back the operation. We could cut out the agent and much of the professional help, accept a lower occupancy rate, do the work ourselves in unlet periods and aim to take enough rental to cover a £5400 council tax bill. I think many people in my position who are genuinely trying to run a commercial operation will take the same view.</p> <p>I believe it would be wise for WG to revise the qualifying letting period down to 147 days. In this way you remove a potentially dangerous tripwire for those genuinely trying to run a commercial holiday let. Also you avoid the messy administration of policing a boundary that, being set too high, will frequently be crossed. I do not think taking this step would in anyway compromise the WG's objectives but it would remove a lot of harmful unintended consequences.</p>
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<b>Business Details</b>	A 2 bedroomed holiday apartment with underground parking within the Castle walls in (central Tenby)
<b>Short Description</b>	This is our 7th season
<b>Impact on the business of 182 threshold</b>	Our apartment is always open all year and shut for renovations only. Most of our bookings are during the summer months till September and Iron Man has taken place the bookings stop. Tenby has little to offer as many businesses close and it becomes a ghost town apart from the daily visitors who do not spend so much. Our guests in our apartment tend to use it as a base and eat out at local bars and restaurants, shops in the local stores. We also employ local cleaners use the local laundry, and purchase all the day to day needs in local shops, therefore contributing to the local economy.
<b>Personal impact</b>	The impact on my husband and I would be enormous, with bookings down by half this year, the cost of running the apartment, services, water, electricity etc. cleaning, laundry, service charge refuse disposal, unless we can keep to the 140 days it would be unviable and we would end up having to sell
<b>Turnover</b>	CY 2019 - £10.264 gross CY 2020 - with the accountant CY 2021 –
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £2140
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £4280
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £6420
<b>Planning Permission restrictions</b>	

<b>Any Other Comments</b>	
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<b>Business Details</b>	two self-catering units in a converted stone barn in Builth Wells
<b>Short Description</b>	one has one double bedroom and the other has a double and a single bedroom. They are situated in a rural location on a working hill farm.
<b>Impact on the business of 182 threshold</b>	<p>I have been trading since 2008 and the planning permission was granted for 'holiday lets' only. I am registered for business rates but benefit from small business rates relief, and the rateable value of the 2 units is £4100.</p> <p>I do not want to give up running the holiday lets, so hope I can meet 182 day threshold and intend to do all that I can to do so. I advertise with a national agency (Travel Chapter) and also take my own bookings. I have already met with my Travel Chapter property manager to discuss how I can make improvements to increase bookings.</p> <p>I would just like to make a few points that effect my business due to their location. Some winters I am unable to accept bookings as snow will block the road. (I have had people previously blocked in). We do not yet have broadband at the holiday lets, the local (very rural) community have been trying to get this for years and hopefully this year, there will be superfast broadband in the area. Once we are connected I am hoping this will have a positive effect on my bookings.</p> <p>If I found that I could not meet the threshold it would be extremely problematic, I know that I could not afford to continue operating as a holiday let and paying council tax, especially at the increased rates. If they could be long-term let (change of planning permission permitted?) I don't know how suitable they would be for this. Also, their integrated position on the farm means that selling them would be impossible unless selling the whole farm, (but currently I think holiday lets in Wales would not be a desirable buy!!).</p>
<b>Personal impact</b>	<p>I am an optimistic and positive person, however, I am very concerned about the future of my holiday lets. I met the 182 threshold during the last year with both properties, but this was for the first time, but last year there was a high demand for holidays in the UK. I feel that I contribute to the local economy by using local tradespeople for jobs required at the lets, and that combined by the money spent by customers must surely be beneficial to rural Powys. I have put a lot of time, energy and money into the holiday lets to make them the best I can and I would be absolutely devastated if I am forced to give them up. I am concerned that if my personal circumstances changed (such as having an illness/ injury, having another baby or the need to care for a family member), I could be prevented from taking enough bookings to meet the threshold. I manage to 'juggle' my present commitments, which include caring for a young child. This</p>

	can be stressful enough without the additional anxiety caused by these future changes.
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	Finally, I would just like to make the point that the current cost of living crisis is additional pressure that I think is going to seriously effect this year's bookings. I think many people will find it difficult to afford holidays. Therefore, it will be increasingly hard to achieve bookings - will the Welsh Government take external factors like this into consideration??

<b>Business Details</b>	a detached, one-storey, rural property, within easy walking distance of the coast in Pembrokeshire.
<b>Short Description</b>	From 1987 to the present is has been let for short-term holidays through Coastal Cottages.
<b>Impact on the business of 182 threshold</b>	<p>I am a vicar and for most of my working life, from 1987 onwards, the Church of England provided me with a house to live in, but the Mill was the only home I owned. I married in 1991, children followed, and we have enjoyed numerous family holidays there over the years. And a number of others have made it their regular holiday destination, renting it through Coastal Cottages. It is a popular property and has generally let quite well over the past 35 years.</p> <p>The property has generally been rented for at least 20 weeks in a year; usually the figure was about 24 weeks, ie 168 days; occasionally higher, as in 2019 when the total was 26.5 weeks (186 days). So, assuming that people will still be able to afford holidays, a new threshold of 182 days should see us getting near that total in a given year, but by no means always reaching it.</p>
<b>Personal impact</b>	On a vicar's salary I was never in a position to subsidise its costs, which had to be met from rental income. Thankfully we have ended each year with a small surplus, enabling us to carry out renovations etc from time to time. Our gas bill has always been enormous and is now set to be even bigger: if we had also to pay council tax, at any level, we might, reluctantly, have to put the property on the market.
<b>Turnover</b>	CY 2019 - £15,690 expenditure £12,580; net surplus £3110. CY 2020 - CY 2021 – £14,054; expenditure approx. £13,674; net surplus £380.

<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1881
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £3700
<b>Incremental cost of Council Tax at 300%</b>	At 200% Council Tax: £3700
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>In a good year, we might just be able to absorb standard rate council tax. But not every year is a good year. And on top of current and future increases in utility bills I would be surprised if we ended a year with even a small surplus.</p> <p>If charged council tax @X2, we would definitely end any year with a loss; unsustainable in the longer term.</p> <p>If charged @X3, we would have to sell the property, as I can't subsidise its costs on a Church of England pension.</p>

<b>Business Details</b>	2 bedroom self catering cottage adjacent to our home
<b>Short Description</b>	which we have let from March to end of October since 2016
<b>Impact on the business of 182 threshold</b>	we will have to stay open for longer in the hope of attracting guests. Additional costs incurred for winter heating and lighting and cleaning, we would not recoup that through bookings as number of tourists out of season is low in this area.
<b>Personal impact</b>	The impact on me personally is that we would find it difficult not to have a break. We are both retired and use the cottage income to supplement our meagre pensions. The adjoining property was built as an annex for an elderly parent. I had to give up my work and accept a low pension to care for him. Years of care have taken their toll-financially and mentally. We would find it most difficult to carry on letting through the winter months and it would not be viable for us thus losing what little income we have.
<b>Turnover</b>	CY 2019 - £21,330 CY 2020 - CY 2021 – £22963
<b>Incremental cost of Council Tax at cost</b>	£1483
<b>Incremental cost of Council Tax at 200%</b>	£4497
<b>Incremental cost of Council Tax at 300%</b>	£5995
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	A holiday cottage, rural location, 2 miles from coast in Pembrokeshire,
<b>Short Description</b>	Been trading for 7 years.

<p><b>Impact on the business of 182 threshold</b></p>	<p>We may make the threshold in some years. If we have a period of major refurbishment, a poor year of bookings, then we probably shall not. No two years are exactly the same. The race to fill 182 days is likely to drive prices down and instead of the striving to improve the standard of accommodation in Wales, we shall be on a spiral downwards to reduce costs to compete with those desperate to fill their 182 days. There will be a loss in quality holiday accommodation and a reduction of standards.</p> <p>We have stopped taking short term bookings because the cost of cleaning, maintenance and energy (electric and oil) takes up most of any fee we take after our local holiday agency fee. If a breakage occurs then any 'profit' is effectively wiped out. Running a holiday cottage is not the 'cash cow' people think it is. Especially if you care about it. We could reduce costs and employ a national holiday letting company but whilst we can afford it, we prefer to keep it local and support local businesses in the area.</p> <p>If there is no benefit to running the cottage as a business and the rates etc are too expensive then that may force our hand to reduce bookings and thereby the benefit to local economy. I appreciate the argument about providing local homes to local people, but we are local people and the cottage is a potential home for our children. Local housing for local people will be equally unreachable for young people if there is no tourism employment – (a major industry in the area) to employ them to allow them to buy homes.</p> <p>The success of a holiday cottage depends on a number of things including location. Location cannot be changed. Those holiday lets which are not in the most desirable locations will suffer most and find it most difficult to meet the 182 days requirement. These will probably be located in areas where there is less politically sensitivity to holiday cottages.</p> <p>My own view is a rise in the threshold is fine but not to the level of 182 days. Something between the current level and the proposed level would be better.</p>
<p><b>Personal impact</b></p>	<p>We do not operate the cottage as a second home. We are local. We purposely employ local letting agents, local cleaners, local groundsmen. The majority of our own spend is within 40 miles of the cottage. The guests spend in the local area supporting local businesses. We do make a profit and we invest at least some of that back into the cottage each year, employing local tradesmen...</p>
<p><b>Turnover</b></p>	<p>CY 2019 - £14,250  CY 2020 -  CY 2021 – £8,072</p>



<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1926 less £300 for refuse collection if then treated as domestic?
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £3852 less £300 for refuse collection?
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £5778 less £300 for refuse collection?
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	5 holiday cottages acquired over the course of 17 years, in Pembrokeshire different sized units.
<b>Short Description</b>	
<b>Impact on the business of 182 threshold</b>	The impact of the 182 threshold will be catastrophic - this is the business that we live off. The cottages have different seasonal patterns. We employ 3 companies/businesses to clean the properties, we pay maintenance and grass cutting companies for regular contracts, we pay window cleaners for regular contracts. The guests that stay in our properties make heavy use of the local pubs, restaurants, shops and visitor attractions in the area. We would have to consider selling the properties if this happens as the business would like become unviable. All the properties would be above the £250,000 mark meaning that they are not going to help those who are struggling to buy. They may end up being bought by the super rich who can afford to seldom stay in them and don't care about spending triple the council tax money on them for the privilege. Also if those people decide they can get the same kind of property without having to pay the triple council tax elsewhere and even in England that's where they will buy and spend their money in their car parks, pubs, restaurants, local contractors, builders, shopkeepers etc.
<b>Personal impact</b>	As previously mentioned this is an important revenue source for us, we have built this business as an alternative to having a pension. We were both brought up in Pembrokeshire and both sets of parents still live here, we have both lived away and come back to make a life and home here where our children have learned welsh and adore where we live. The tourism in the area is allowing local youngsters to start businesses, it provides seasonal jobs for lots of school age children, it provides lots of top up earnings for adults and provides facilities and businesses for the area that just would not be here if it were not for the holiday makers and second home owners.
<b>Turnover</b>	CY 2019 - £19343 per property CY 2020 - CY 2021 – £22526 per property
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £12278

<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £24,556
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £36,834
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	The cottage lies at the foot of Foel Cwm Cerwyn two miles from the village of Maenclochog in Pembrokeshire.
<b>Short Description</b>	
<b>Impact on the business of 182 threshold</b>	<p>The cottage has always been advertised through an agency and since 2016 with West Wales Holiday Cottages in Aberporth , evidence enough that it is a genuine holiday let business. The cottage has been in the family for three generations and it was our intention eventually to retire there when the farm will be taken over by one of our daughters</p> <p>With reference to the proposed legislation clearly there should be a definite distinction between second homes and legitimate self catering accommodation.</p>
<b>Personal impact</b>	<p>The decision to become involved in tourism was to supplement our farming income being that farmers at the time were encouraged to diversify to add extra income to their enterprise. Holiday lets are a source of income to their owners , create employment and make a contribution to the local economy.</p> <p>Being in a rural area the property is some distance from the popular West Wales coastal area I believe it would be a struggle to meet the proposed new occupancy rules of 252 available and 182 actual let and also would be impossible to guarantee. Initially the cottage was available all the year round but with no or very few bookings until Easter I decided after 3 years to open the cottage from Easter to the end of October, and this I have done to the present day. This has worked well for my business giving time to do maintenance and some renovations that require more than a few days or weeks. The opening times for the cottage also fits in with our work on the farm. For the last 3 years I have had to employ a cleaner to help me with the cleaning etc. as I suffer from Rheumatoid Arthritis, therefore the extra weeks would put an extra strain on my health and well being.</p>
<b>Turnover</b>	<p>To April 2019 - £6090.00</p> <p>To April 2020 - £6194.00</p>
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1498.00
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £2996

<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £4494
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	As can be seen if the above Council Tax would be applied at 200% or 300% and together with other expenditure involved especially the rising cost of electricity (property all electric) it would no longer be a viable business.

<b>Business Details</b>	One holiday cottage on the farm with 3 ensuite bedrooms in Crymych. 4 star rated by Visit Wales. Converted from a dairy building approximately 18 years ago.
<b>Short Description</b>	The farm is approximately a half mile from the road.
<b>Impact on the business of 182 threshold</b>	The impact on the business of a 182 day threshold would make it unsustainable. Because the cottage sleeps up to 7 guests including a children's room, most bookings are for school holidays, so 6 months bookings are unlikely.
<b>Personal impact</b>	We spent a lot of time and money to provide a very good standard of accommodation and could not afford to run it as a holiday cottage with the increase in council tax. We might as well gut it and return it to animal housing. To make it worthwhile we would have to increase the cost to a level which guests would be probably not consider as they could find a holiday abroad with guaranteed sunshine for less money. Wales does have a reputation for being very wet. The decrease in the number of guests would also have a detrimental effect on local economies.
<b>Turnover</b>	CY 2019 - £9400 CY 2020 - CY 2021 – £12500 Both years cost of cleaning, laundry etc. not included
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £2060
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £4120
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £6180
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Cottage in Aberfforest, Pembrokeshire.
<b>Short Description</b>	We purchased the Cottage as an existing and successful holiday letting property business in August 2019. The cottage sleeps 6 guests. We have a very attractive rural, coastal location in the Pembrokeshire Coast National Park, about 150 metres from the coast path and a small-semi private beach. The properties are professionally marketed and managed by a local family run agency, and local people are employed for cleaning and maintenance etc.

<p><b>Impact on the business of 182 threshold</b></p>	<p>In a typical year we would receive bookings between March and October. Outside this period there is little interest, as the weather is not reliable. Pre-pandemic there were bookings for approximately 110 nights in the property each year. Last year the figure was somewhat higher, with 137 days being booked, but we believe that this was a temporary situation caused by the pandemic, with people being more likely to choose a staycation in the UK instead of travelling overseas.</p> <p>Over the last two years we have carried out extensive renovation and building work at the cottage. This work has been done by local tradesman, and materials were bought locally as much as was possible / practical. Over the last 2.5 years we have been investing in these improvements and, as a consequence, have been running at a loss. We have been looking forward to now being able to recoup some of these considerable expenses by attracting more guests to our cottage. Even so it is hard to see how we could manage to increase our bookings to 182 days per year. Should this new legislation go ahead, we would be forced to move from business rates to Council Tax. If the latter were levied at three to four times the normal rate it would make the business unviable. Approximately 70% of our turnover is spent locally in agency fees, housekeeping, LPG, maintenance and ongoing improvement. All this spending would be lost to the local economy, as would the money spent by our guests with the local businesses that we recommend to them.</p>
<p><b>Personal impact</b></p>	<p>We would be forced to cease trading and, since we would still be liable for a multiple of Council Tax, we would need to attempt to sell the property. The cottage does not have planning permission to be a permanent residence, and the location and size makes it unsuitable in any case. Almost certainly we would have to sell at a considerable loss in capital value as any new purchaser would also have to pay the higher level of Council Tax.</p>
<p><b>Turnover</b></p>	<p>CY 2019 - £3,474 (par year with loss £5528)  CY 2020 -  CY 2021 – £18,669 (of which £10,000 was provided by the Covid small business grant)</p>
<p><b>Incremental cost of Council Tax at cost</b></p>	<p>At 100% council Tax: £2568</p>
<p><b>Incremental cost of Council Tax at 200%</b></p>	<p>At 200% Council Tax: £5136</p>
<p><b>Incremental cost of Council Tax at 300%</b></p>	<p>At 300% Council Tax: £7704</p>
<p><b>Planning Permission restrictions</b></p>	<p>The property is a converted farm building without central heating, and some distance from local amenities. It is accessed by a long and poorly-maintained farm track (not ours). There is a planning restriction which only allows holiday rental use.</p>

<b>Any Other Comments</b>	
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<b>Business Details</b>	We have a one bedded cottage for two guests attached to our home in North Pembrokeshire
<b>Short Description</b>	We have traded for 30 years now.
<b>Impact on the business of 182 threshold</b>	<p>In a 'good' year we can hope to reach 140 letting days. The proposed 182 day threshold and consequent business rates for not reaching this would make running our small business unviable.</p> <p>As you will hopefully be aware, the holiday letting market, as with all tourism, is not consistent. Last year, owing to Covid19 restrictions on European travel, we had good bookings. This year is proving to be the opposite with many weeks not taken for us and other small letting businesses. Costs to maintain a property have rocketed along with the fuel bill, which is not possible to pass on to guests in this competitive market.</p> <p>Profit in this arena is reducing greatly and we were seriously considering our future in it prior to this consultation. Having to pay a business rate will be the last straw for us.</p> <p>The consequence is that we may try to let permanently (not certain of this viability)? Or sell the property. This value would be out of reach to many locals and would most probably go to an out of area purchaser.</p>
<b>Personal impact</b>	<p>Another possibility is that we may have to sell our home and the attached holiday let as we wouldn't be able to continue living in our home and community without the viable letting income. This home has been in the family since 1985.</p> <p>Tourism is a huge financial asset to our area. The knock on to all leisure providers from a reduced visitor income would be significant.</p>
<b>Turnover</b>	Our income for the years 2019 & 2021 both operated at a financial loss owing to essential maintenance of the property. This will greatly reduce this year owing to fuel and all servicing cost increases.
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1200 reduced to around £600 with SBRR
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>I would politely request that this issue and its consequences are given serious consideration. I would repeat that this market is struggling to be viable as it stands in the current circumstances.</p> <p>The proposed changes would have a significant impact on our business and future options in this area.</p>

<b>Business Details</b>	We have a 4 bedroomed holiday house in Barmouth that sleeps 8
<b>Short Description</b>	We bought the property in September 2018. After doing major refurbishment work in the house, we opened it as a holiday let in May 2019. We use a local Barmouth based agent to run and manage the property for us. During lockdown we successfully managed to change our property onto business rates.
<b>Impact on the business of 182 threshold</b>	Our house had barely had a full year of trade before the worldwide Covid pandemic. We had not built up any repeat or loyal visitors. When the country was allowed to move around again in 2021, we benefited because the population could only holiday in the UK and we had almost 5 months of solid bookings. However, now that flights out of the UK are allowed again, we have already noticed that our bookings are lower than this time last year. We still have availability in the summer, and all of the out of season, winter months are all available. Even Christmas and New Year is still available. If we can't meet the 182 requirements, we will obviously be forced to return to a council tax band E property, at £1814 per year and then be subject to the 300% rise making our council tax bill £5442 per year. After the costs of running and maintaining the property, we would probably personally be subsidising the business.
<b>Personal impact</b>	We spend time at weekends doing repairs and maintenance to the property to try and save money, but this would be very stressful as we would have to reconsider when we would be able to get this done to ensure that it is available, this would make it hard for us to keep on top of the work that is involved with a holiday let. We would also really like to do some external insulation work to the house, to make the house more sustainable and reduce the amount of energy we use. But this would take about a month to get done, therefore reducing the availability and almost certainly make us not meet the 182-night criteria. We have also looked into installing solar panels to also help the environment and be more sustainable, but again, this at the moment is completely unfeasible.
<b>Turnover</b>	CY 2019 - £6754 loss CY 2020 - £4166 CY 2021 – with the accountant
<b>Incremental cost of Council Tax at cost</b>	£1814
<b>Incremental cost of Council Tax at 200%</b>	£3628
<b>Incremental cost of Council Tax at 300%</b>	£5442
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Holiday lets near St Davids, Pembrokeshire.
<b>Short Description</b>	Two cottages (one sleeping 4 and one sleeping 6) in an isolated rural coastal position. They are on the Coastal Path and are popular with walkers. Access is down narrow lanes about a mile from the main road. The area is popular with walkers and surfers. We have let these cottages for 21 years as a small business. We let through Coastal Cottages of Pembrokeshire
<b>Impact on the business of 182 threshold</b>	Probable impact of the 182 day threshold - we have always made the cottages available for letting for the maximum period possible, only withdrawing them for maintenance or the occasional stays we make there. They have always met both the availability requirements and the occupancy requirements of the current Business Rates regulations. They will meet the proposed new availability standards. 2021 letting for one cottage exceeded the new occupancy requirements. The other cottage was 21 days short. However, 2021 was a particularly good year. My record of previous years' letting suggest that this is unlikely to be met on a consistent basis. We will attempt to increase letting to meet the requirement by closer attention to marketing, discounts and special offers. However, if we are required to pay domestic rates, we would need to consider the ongoing viability of the business. We could probably absorb the standard Domestic rate within current charges. However, at 200% or 300%, we would have to pass on the costs to guests through rent increases, and to local traders and services through reducing our use of local people for gardening, maintenance and decorating etc.
<b>Personal impact</b>	We would have to consider giving up if it ceases to break even, and take our investment elsewhere. We would be sad to lose long established partnerships with local traders and businesses. Having to manage the budget more rigorously would make running the cottages less pleasurable, and we would be sad not to be able to provide a service which has caused many of our guests much joy and enjoyment of the Pembrokeshire coast and countryside.
<b>Turnover</b>	2019/20 - £27371 2020/21 - £38690 Nb. This figure includes COVID business support grant. Most of the grant has been spent this financial year on repairs and refurbishments undertaken by local traders, that we would have otherwise been unable to afford.
<b>Incremental cost of Council Tax at cost</b>	£3700
<b>Incremental cost of Council Tax at 200%</b>	£7400 - If having to recoup from guests, it could mean an increase in rental of 25%
<b>Incremental cost of Council Tax at 300%</b>	£11100 - if recouping from guests, it could mean an increase in rent of 37%.

<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	1 bed end of Terrace in St Dogmaels.
<b>Short Description</b>	I bought the cottage in February last year and undertook substantial renovations. It was ready to let (and actually let) from 21st July 2021 so I have only been trading for 8 months.
<b>Impact on the business of 182 threshold</b>	it is my intention for the property to be let as much as possible and would love for it to be let more than 182 days. The business is new, it was only let from 21st July but from that date to the same date this year I am expecting the cottage to have been let out for at least 160 days which will hopefully increase by the following season. I'm very concerned though that some of the businesses that attract visitors, or depend on them, (and the knock on effect to the local economy) may not be viable if there is a decrease in available accommodation. I know that many local businesses make a loss through the winter. It would help if there was more support for year round attractions, for example if the National Museums collaborated with Cadw properties, eg touring exhibitions, intensive blocks of Welsh language courses, art, craft, baking, cheese making and other courses or other attractions. Advertise the coast path in winter. 182 days is a lot in an area which can be cold and wet!
<b>Personal impact</b>	The impact on me personally if I was unable to let for 182 days is massive. I am nearly 60 and have no pension. I have invested a huge amount of money renovating a house that was more than damp ( the walls were wet including in sockets) the electrics and the oil boiler were dangerous. The money I have spent has mostly gone to local independent Welsh speaking tradesmen. I send out information in advance to visitors about the wealth of independent shops locally so that they don't turn up with all their food shop done and don't head straight to Tescos. I live in Cardiff so the profit I make remains in Wales. The real issue facing local people is the lack of quality employment. How many local graduates don't come back? It's likely that more young people move away for better employment than leave because of lack of housing (build more quality affordable homes only available to local people- there are plenty of schemes nationally - this is a national problem)
<b>Turnover</b>	I haven't traded for a whole year but I estimate turnover July- July approx £11,000
<b>Incremental cost of Council Tax at cost</b>	Pembrokeshire band B
<b>Incremental cost of Council Tax at 200%</b>	



<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	a grade II listed building which has been run as a FHL for the last 20+ years. The property sleeps 16 and is in a rural area of Ceredigion
<b>Short Description</b>	<p>We as a family all live on site, myself and my family in one outbuilding my mum in another and my sister in another. The main house is on the grounds and available to let all year round, we do not use it for personal use at any time through the year. We do not make a large profit, but enough for my mum to live off and for us to be able to maintain the listed building.</p> <ul style="list-style-type: none"> <li>• We live onsite, this is not a second home.</li> <li>• The property is available 365 days of the year - no used for personal use.</li> <li>• We sleep up to 16 - there is not continuous demand out of holiday season/weekends - but we bring more people to the area through the year than a small sleeps 2 let for 182 nights of the year.</li> <li>• It is a listed building.</li> </ul>
<b>Impact on the business of 182 threshold</b>	We would have to seriously rethink our business model. It would possibly not be feasible to continue. We would have to consider if there is any way to increase nights booked, but this could be at a detriment to quality of customer and at a lesser profit and therefore have an impact on our ability to maintain the building. The listed building could fall into disrepair.
<b>Personal impact</b>	I have lived in Wales all my life and am fortunate to live where I do, but I am only able to do so through hard work and dedication to the FHL. If we were suddenly put into a position where we had to pay up to 300% council tax premium it would leave us having to reconsider our whole situation, how would we maintain the listed building, can we continue to live here, what income would we have. I have recently converted and brought back to use a listed outbuilding in the grounds as a family home, for myself, my partner and my two young children, we want to stay here long term the intention has never been to move or sell, our children go to school locally, but this would possibly effect our whole long term plan. I am able to support my mother who is 73 by living as a family group, having to all live separately could bring other problems.
<b>Turnover</b>	<p>CY 2019 - £35,841 (profit £10,442)</p> <p>CY 2022</p> <p>CY 2021 - £48,978 (profit £18,000)</p>

	In our case turnover isn't a great indicator as actually the maintenance and upkeep of a listed building is high. So profit is greatly reduced before the inclusion of council tax. We normally pay business rates as due to number of beds we are outside of the 100% rate relief, which is also unfortunate as again being a listed building although we might sleep more the upkeep and maintenance is that much higher (but that's a whole other discussion for another time). Our rate bill would be £2511 this year - less than council tax but still high.
<b>Incremental cost of Council Tax at cost</b>	£3528 or £4116 depending on banding I think it's H or I
<b>Incremental cost of Council Tax at 200%</b>	£10,582 or £12,348 depending on band
<b>Incremental cost of Council Tax at 300%</b>	£14,112 or £16,464 depending on band
<b>Planning Permission restrictions</b>	An additional consideration for us is not around planning permissions but that the building is a listed and I feel this should be taking into consideration when deciding on business rates.
<b>Any Other Comments</b>	

<b>Business Details</b>	One Small Two Bedroom Holiday Cottage in Anglesey , detached but within three feet of my own home on 16 acre small holding.
<b>Short Description</b>	Outbuildings converted in 2018 following death of my husband. Opened for Trading March 2019. Rural location.
<b>Impact on the business of 182 threshold</b>	Marketing an already time consuming and stressful business within the complex of my own home will become even harder. Market forces and UK weather are a big influence on Holiday trends in Wales . A 182 day enforced occupancy criteria could potentially reduce the quality of Guest to be accepted. Accommodation standard may be compromised due to decreased revenue
<b>Personal impact</b>	As a part time carer, part time worker and running a self catering holiday let under enforced occupancy rates of 182 I have no doubt that my mental health would suffer and I would seriously have to consider my position living in my home of 30 years standing. Converting outbuildings was a means to enable me to remain at my home after being made a widow. My home however would no doubt, if offered up for sale, be purchased by someone financially able to purchase two dwellings and a 16 acre small holding complex and would in no way liquidate housing for first time buyers or the like.
<b>Turnover</b>	2019 – Company Accounts as a Whole (1st Year of Trading) £15,126 2021 Accounts not yet filed
<b>Incremental cost of Council Tax at cost</b>	At 100% council Tax: £1016.50

<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax: £3,049.50
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax: £4,066.00
<b>Planning Permission restrictions</b>	Self Catering Planning Restriction ( * Applies to current Unit and also adjacent unconverted farm buildings which will never be converted by me due to lack of funds / impact on Privacy)
<b>Any Other Comments</b>	

<b>Business Details</b>	Self catering holiday accommodation in Morfa Nefyn
<b>Short Description</b>	<p>Our property is situated on Lon Bridin in Morfa Nefyn. It is approximately 100 metres from the beach and in an excellent location to provide holiday accommodation. The property is a semi detached property comprising four bedrooms (catering for up to 8 people).</p> <p>We acquired the property in July 2021. Prior to our acquisition the property was run as a self catering holiday accommodation business by the previous owner.</p> <p>Our intention when we acquired the property was to continue to run it as a business providing self catering holiday accommodation. Since our acquisition we have invested a considerable amount to renovate/upgrade the property which was in need of updating.</p> <p>We have retained Quality Cottages who marketed the property for the previous owners as our marketing agents. The property is marketed through their website, Airbnb and other related websites.</p> <p>During our ownership, the property is available to provide self catering accommodation 365 days per year. We book the property for a couple of weeks each year for our own use on weeks when the property is not already booked by others as holiday accommodation.</p> <p>For the year April 2022/2023 we have secured bookings for 16 weeks with a forecast income of c. £14600. We are trying to secure further bookings (particularly for those weeks in the summer where the property is still not booked). I hope we might achieve another 4 weeks. After deducting allowable</p>

	<p>maintenance/running costs I anticipate this will be about break even.</p>
<p><b>Impact on the business of 182 threshold</b></p>	<p>It is clear from the previous levels of letting of our property and the forecast level of letting for this coming year that our property has not and will not achieve the proposed 182 day (26 week) threshold to qualify for business rates. That will mean that we would lose the entitlement to business rates and small business rates relief and will be liable to Council tax at potentially upto 300%. Factoring Council tax (even at 100%) as a cost of our self catering accommodation business would mean the business would be running at a loss. If the 200% or 300% premium was charged by Gwynedd County Council that would increase the level of loss and make the business unsustainable.</p> <p>I have a number of concerns with the 182 day qualifying threshold.</p> <p>The first is that achieving that level of letting is outside of our control. We have taken all reasonable steps to market the property for self catering holiday accommodation through recognised market agents as well as using well known websites. We also make the property available for 365 days per annum. We are advised by Quality Cottages that the property is in a good location for holiday accommodation given its proximity to the beach and other facilities in Morfa Nefyn. Notwithstanding this the property has not achieved a level of letting that meets the 182 threshold. We can make the property available for 365 days per annum but we cannot make people actually book it. That depends on a variety of conditions outside our control including factors such as the current cost of living crisis which we are advised by Quality Cottages is affecting and will continue to effect the self catering market for the foreseeable future.</p> <p>My second concern is that the self catering holiday season in places like Morfa Nefyn is limited. It effectively runs from early April to mid September. Outside of that period there is very little scope for securing holiday lettings apart from the half term week in February and again in October and the New Year week. However from our experience thus far we have not secured any bookings in either of the half term weeks or over New Year.</p> <p>The season is realistically therefore a maximum of 26 weeks (ie 182 days). Setting the threshold at 182 days means there is no margin for error at all – ie no flexibility if tourism is quieter in any particular year. Our property has no realistic prospect of hitting that threshold as we are likely to be in the 16-20 week per annum</p>

bracket. That is comfortably above 60% of the realistic holiday market season but still well below the proposed 182 day threshold.

I have checked the availability of other holiday accommodation in Morfa Nefyn on Quality Cottages' website and our level of letting is comparable with most of the other properties. That means that it is highly likely that most of the self catering accommodation in Morfa Nefyn will fail to meet the qualifying threshold.

In my view the availability of the property for self catering accommodation should be the key criterion to avoid any abuse of the self catering business model and I do not oppose the 252 day threshold. For the reasons set out above however setting out the actual letting days threshold at 182 days is unrealistically high and will lead to most existing self catering holiday accommodation failing to meet the threshold. That surely cannot be the aim of the proposed change.

The knock on effect of the propose change is that properties such as ours failing to qualify will be liable to Council tax which can potentially be charged at 300%. Should that happen the significant additional extra costs means that we will not be able to afford to continue to provide self catering accommodation at our property and I imagine there will be a number of other property owners in a similar position. That will inevitably lead to a loss of tourist accommodation in the area and similarly it will have an adverse knock on effect for the tourist industry in that area. That cannot surely be the intention of the Draft Regs.

It will similarly be prejudicial to the local economy. By way of example we currently use a number of local businesses to service/support our property including:-

- a local cleaning business which employs five local women/mothers whom we employ to clean the property for every week it is let,
- a local caretaker/key holder who is retained on a 12 month basis,
- a local gardening business,
- local tradesmen – this winter we have used a local electrician, builder and decorator.

	The loss of our property and others like it to the self catering market will have a detrimental impact on those local business who are dependent to varying degrees on the tourist industry.
<b>Personal impact</b>	I have set out above that we will not achieve the 182 day threshold despite our property being in a good location to provide self catering holiday accommodation, actively marketed through reputable businesses in this sector and despite our property being let for effectively 60% + of the realistic holiday season. The financial consequences of us attracting Council tax at 100%/200% or 300% means that our business will run at a loss and that will be unsustainable. Our position is exacerbated by the fact that we also have a mortgage on the property and we will not be able to meet mortgage repayment costs as well as subsidising the self catering holiday business. It will inevitably lead to our property ceasing to provide self catering holiday accommodation. If other properties do likewise in the area which I consider is likely there will be a reduction in the holiday accommodation stock and that will have a knock on impact for both the tourist industry in the area and the local economy in particular those business which are dependent on the tourism market.
<b>Turnover</b>	The turnover for our property is as follows:-  -2019/20 - £16,528 -2020/21 - £13,012 -2022/23 -£14,600 (forecast)
<b>Incremental cost of Council Tax at cost</b>	We would pay £2,600 on the basis of 100% Council tax.
<b>Incremental cost of Council Tax at 200%</b>	We would pay £5,200.
<b>Incremental cost of Council Tax at 300%</b>	We would pay £7,800.
<b>Planning Permission restrictions</b>	

<b>Business Details</b>	Former farmhouse, high on a hillside away from village, let as a single self-catering unit for up to 6 occupants in Corwen, Denbighshire
<b>Short Description</b>	We have been trading since 2016.
<b>Impact on the business of 182 threshold</b>	We have never achieved 182 days occupancy in the six years we've been operating (except in the exceptional 'staycation' year of 2021) as our property is in a rural, inland area which is not as attractive to visitors as coastal properties. This is despite being available year round and advertised on several platforms including traditional holiday brochure companies and Airbnb. We are an Airbnb

	<p>Superhost and have excellent reviews with a large number of repeat visitors.</p> <p>The additional costs of the premium council tax would mean the business would almost certainly not be viable. It would be catastrophic for us and all small businesses like ours away from the popular tourist hotspots. This is not a second home for us, it is a business and is operated as such.</p>
<b>Personal impact</b>	<p>We would have to look seriously at the viability of the business. This would be a extremely difficult decision personally as the property has been in our family for over 60 years and we have strong links to the local area. We are strongly in favour of continuing as a holiday let, this not only brings tourist income into the area (eating out, shops, attractions etc) but also provides regular employment and income to three different local businesses (gardening, cleaning and laundry services), plus other general maintenance services annually and as required. We understand the issues that there are in tourist hot spots such as Abersoch but this is not the case in our local area.</p> <p>However we would not be able to operate the business at a loss.</p>
<b>Turnover</b>	<p>Income in 2019: £10,645</p> <p>Operating Loss in 2019: £7,734</p> <p>Income in 2021: £21,058</p> <p>Operating profit in 2021: Not yet calculated, but likely to be small positive profit – perhaps up to £5000, which we are hoping to use for improvements (using local labour)</p>
<b>Incremental cost of Council Tax at cost</b>	Not sure, but assume around £1,800
<b>Incremental cost of Council Tax at 200%</b>	Not sure, but assume around 2 x £1,800 = £3,600
<b>Incremental cost of Council Tax at 300%</b>	Not sure, but assume around 3 x £1,800 = £5,400
<b>Planning Permission restrictions</b>	Not that we are aware of.

<b>Business Details</b>	a holiday cottage run as a furnished holiday letting under HMRC rules.
<b>Short Description</b>	We bought a single holiday cottage just outside the Conwy town walls at the end of 2018. We undertook a complete refurbishment using local tradesmen which was completed in July 2019. We have been running it as a furnished holiday letting ever since. It has roughly matched our modest investment model, if the impact of Covid is ignored.

<p><b>Impact on the business of 182 threshold</b></p>	<p>As we have been trading for less than three years and each complete year has been impacted by Covid we do not have a proper view of a “normal” year. However the holiday cottage has readily achieved the business rates target of 70 days let and, as it is essentially available for booking all year, we even more convincingly achieve the target of 140 days availability.</p> <p>We have also achieved the HMRC targets of 105 days let and 210 days available. However we did not exceed the 105 days let target by much with an excess of 10 or 20 days seeming “normal”. In our view there is no chance when running the property as a holiday cottage that we could achieve this new target of 182 days, i.e. 73% higher.</p> <p>If a new target of 182 let days was set then, unless the holiday rental market can accept an increase in rentals of 20%, 40%, or 60% in weekly rental charge (see 7, 8 &amp; 9 below), which seems unlikely, we cannot see how we can continue with our holiday letting business. We would therefore, along with many other owners, sell our holiday cottage and a rapid decline of the tourist industry in North Wales would follow, along with the knock-on effects of increased unemployment and poverty in the local population.</p> <p>Incidentally, 182 let days does not seem wrong for long-term lettings, but in North Wales an expectation of occupancy of more than half the year for holiday accommodation seems untenable.</p>
<p><b>Personal impact</b></p>	<p>We have invested a considerable sum into our holiday cottage. At the start we spent approaching £50,000 refurbishing and fitting out the cottage (having paid just under £200,000 to buy it). We are currently reaching the end of a new £13,000 project to convert the back yard into a garden that will provide a pleasant environment for our guests. In both cases nearly all the expenditure was with local North Wales businesses and much of that covered labour costs.</p> <p>If we sold the property in the next year we would not recover these costs. Indeed if we had known that the financial basis of our decision to buy the cottage would be turned on its head within four years then we would not have proceeded back in 2018.</p> <p>We essentially bought the property with a view to having a fairly reliable income going into our retirement. We have been happy to invest substantial sums into the property (approximately a third of the purchase price) on the basis that this would provide high quality holiday accommodation to visitors to North Wales with a view to obtaining high customer satisfaction and high levels of</p>



	<p>repeat bookings. Each of these would then help us to recover our investment over the long-term.</p> <p>Clearly, setting unreasonable letting targets will destroy our chances of recovering our investment and of helping one of our goals which is to support local businesses, both tradespeople and suppliers.</p>
<b>Turnover</b>	Our turnover in 2019, a part-year, was £5,000, and in 2021 our turnover was £9,500
<b>Incremental cost of Council Tax at cost</b>	Incremental cost of Council Tax would be £1803, i.e. approximately 20% of our turnover so rental income would need to increase by 20% to cover this. If that was not achievable we would sell the property, which would be very sad as we have invested substantially in the business and this part of Wales. We have also spent weeks of our life travelling back and forth and managing the initial project, time we will never get back.
<b>Incremental cost of Council Tax at 200%</b>	Incremental cost of Council Tax would be £3606, i.e. approximately 40% of our turnover so rental income would need to increase by 40% to cover this. We would probably sell the property.
<b>Incremental cost of Council Tax at 300%</b>	Incremental cost of Council Tax would be £5409, i.e. approximately 60% of our turnover so rental income would need to increase by 60% to cover this. We would almost certainly sell the property.
<b>Planning Permission restrictions</b>	There are none, but we bought the property as a holiday letting business. We would not consider trying to rent the property out on a long-term basis. The reason for choosing Conwy was because it was a holiday destination. We sold a flat we owned close to where we live to provide part of the money we needed to buy in Conwy. If we were going to consider assured shorthold tenancies then we would have kept our local property instead.

<b>Business Details</b>	2 Bedroom Rural Cottage in Heart of Snowdonia
<b>Short Description</b>	<p>been trading for 6 years by ourselves and prior to that owned by my parents for over 20 Years.</p> <p>Our Cottage is in a rural area and predominantly let from around Easter to the end of September on a weekly basis, with Saturday changeovers. There is occasionally an odd week free in this period and also a couple of break weeks kept for bits of essential maintenance that can't be done in the short changeover periods. Outside of this lets tend to be shorter weekends. At the moment post Covid when things are buoyant we just about achieve the threshold, but may just dip under it if incomes become squeezed or if more people return to holidaying abroad. Thus the threshold is very tight.</p>
<b>Impact on the business of 182 threshold</b>	

<p><b>Personal impact</b></p>	<p>1. Maintenance – the Cottage being in a mountain area gets a battering from the weather. Presently repairs are factored in when our local builder is available ( in the past few years the outside has been rerendered, dormers re reroofed, outhouses reroofed after a particularly bad winter, and a glass link built to the outhouses). Time to do this and additional time for over run has to be factored in. We would have to consider using builders from outside the area based on availability out of season rather than local builders or doing work such as rendering when the climate isn't best suited).</p> <p>If break weeks for deep cleans/windows/essential repairs aren't factored in during busy periods our guest will have a poorer experience.</p> <p>2. Changeover Staff currently operate at weekends. If we were to have to go to far shorter breaks to increase occupancy it would become non economic for the changeover staff to get to the cottages they cover in our area if they all end up operating on different changeover days.</p> <p>The consequence therefore of this quite massive jump in the threshold is that if there is slight dip in bookings/the company we use for bookings don't quite advertise enough we could easily dip under which would have quite dire consequences. Whilst I can see the need for a slight increase in the threshold this huge increase could result in our holiday let running at a huge deficit in some years if we suddenly jumped into paying council tax and thus becoming financially unviable.</p> <p>3. In terms of ourselves we might look to use exploring using maintenance/builders from outside the area so we can do repairs out of season (demand is so high at this time it is difficult to find a builder). In the long run the viability of running the holiday cottage would need to be looked into, which is a shame as the tourism spend that it brings to the area as opposed to the day visitor is high.</p>
<p><b>Turnover</b></p>	
<p><b>Incremental cost of Council Tax at cost</b></p>	
<p><b>Incremental cost of Council Tax at 200%</b></p>	
<p><b>Incremental cost of Council Tax at 300%</b></p>	
<p><b>Planning Permission restrictions</b></p>	

<b>Business Details</b>	8 years ago we took on a dilapidated Grade II* listed manor house complex set in some 15 acres of grounds comprising two ancillary cottages and a large number of dilapidated outbuildings (cottages and some of the outbuilding listed Grade II). The property is situated between Porthmadog and Criccieth in a rural setting.
<b>Short Description</b>	Over the past 8 years we've gradually done up the two cottages (sleeping 4 and 5 respectively), created 3 apartments (each sleeping two) in the service rooms at the rear of the manor and implemented a programme to re-roof and make safe the majority of the outbuildings nearest the manor and cottages. This programme is ongoing and requires sufficient time without guests present to complete. We are furthermore renovating the main manor house to create more accommodation for holidays and events (weddings) so it once more serves a purpose and can be safeguarded for the future.
<b>Impact on the business of 182 threshold</b>	As described above we need time without guests present to complete our programme of restoration and renovation and to continue the ongoing maintenance of this large complex. This cannot all take place in the low season winter months due to the vagaries of weather conditions. 182 days occupancy is not 50% of the year but 75% of the year that we tend to get bookings (winter months being notoriously difficult to let due to weather and local attractions being closed) and is an unrealistically and arbitrarily high number (which is also not imposed on <u>any other business</u> either in tourism or otherwise!). We have run the business on the basis of attracting profitable bookings, not simply nights occupied - this would be a race to the bottom. Our business model & plan, drawn up with support from and for Finance Wales, is based on providing quality accommodation in a special setting at appropriate prices, not on high occupancy at cut-rate prices.
<b>Personal impact</b>	On a personal level, we have put every penny we own (and a fair few we don't) into getting a business up and running. If this business were now to fail (and there is a real danger it will due to the proposed and externally imposed conditions) we would struggle to recoup any of this. Apart from COVID grants, we have not received any financial support and nor have we asked for it. We have so far largely managed to balance our income (through bookings but also loans and, due to COVID, the cashing in of our pensions) with the outgoings (and many tens of thousands of these are spend locally on supplies, trades and cleaners) necessary to grow our business. Forcing us to prioritise occupancy beyond a level that is reasonable would upset this fine balance and endanger our entire investment and future solvability. This business is our sole income and will need to serve as our pensions.
<b>Turnover</b>	Our turnover in tax year 2019/2020 was £58,477 Our turnover in tax year 2021/2022 was c. £78,780 (accounts still to be finalised)

<b>Incremental cost of Council Tax at cost</b>	Council tax for the two holiday cottages combined would be £3,365.69 This is on top of the council tax we pay for the main house (part of which we live in) £3,155.33
<b>Incremental cost of Council Tax at 200%</b>	At 200% for the cottages this would be £6,731.38 Total bill (including main house) would then be: <b>£9,886.71</b>
<b>Incremental cost of Council Tax at 300%</b>	At 300% for the cottages, this would be £10,097.07 Total bill (including main house) would then be: <b>£13,252.40</b>
<b>Planning Permission restrictions'</b>	While potentially not constrained by planning, it would be impossible for us to let the cottages on an AST or sell them off: they are part of the Manor House complex and structure, there is no private access and they share the same outdoor spaces and many of the services of the rest of the complex.  Separately, we have tried to make some of the outbuildings which are slightly further removed from main house available to interested (local) parties for conversion into homes, but this has every time failed due to only being able to get planning permission for holiday lets or second homes (anyone spotting the irony here?)

<b>Business Details</b>	A house in Llandudno let for holiday weeks through North Wales Holiday Cottages Ltd.
<b>Short Description</b>	One house on the outskirts of Llandudno, Large three bed roomed semi-detached house generally let to 6 people by the week during the spring, summer and autumn. Started in 2019 Applied for business rating in October 2019, confirmed by Valuation office in February 2020.
<b>Impact on the business of 182 threshold</b>	Impact of the 182 day threshold. We believe that the 182 day threshold is higher than the potential market for holiday letting of this family house in this area. Although we have been letting for only three years (including the lockdown COVID periods), it is clear from the seasonality of bookings, together with information on the popularity of different months from the agency, that the customer demand is from April through to mid-September. There has been little demand outside these months. Theoretically 6 months letting will meet the 182 days, it is unrealistic to assume 100% capacity booking during April – September and a small number of weeks must be reserved for checking and maintenance. So if the new threshold is applied, this letting will not meet the new criteria and the property taxes will revert to Council Tax. Our main home is in Sheffield and so the Llandudno house will be subject to a premium charged on the second home Council Tax guidelines. Due to our use of a local letting agency, local cleaning and laundry company, local gardening service, personal income tax payments on letting income, trade waste bin service etc., the margin of letting income against costs is small. The replacement of

	business rates by Council Tax would produce significant annual losses.
<b>Personal impact</b>	Personal impact of increased threshold Overall the removal of business rate status would call into question our continued ownership of the house. As a letting business, when charged at a premium Council Tax rate, the business would not be viable. Purely as a second home for use by us and our extended family, it would be an extremely expensive way of holidaying in the area. With business rating status as at present the house generates sufficient income to bring visitors into the area for around 20 weeks a year, to provide income to local service companies and to pay for its upkeep. We are both retired. The house allows our family to visit the area and maintain contacts with family in the town of my birth.
<b>Turnover</b>	Letting history Holiday letting was started in late 2019 and in the last three years has booked 2019- 14 days 2020 – 54 days 2021 - 165 days Current forward bookings for 2022 – 128 days The income for the three years (2019-21) to date has been approximately £19,000. Tax returns to April 2021 showed losses, tax return for 21/22 (not yet complete) but will show small profit margin.
<b>Incremental cost of Council Tax at cost</b>	Calculation for rating under Council Tax Council tax was paid on the property until September 2020. At that time the annual cost was £3400. This charge would be additional to the current costs of letting as the weekly trade bin collection service would need to be maintained and paid for.
<b>Incremental cost of Council Tax at 200%</b>	Calculation at 200% Council Tax The additional cost for property rate charges would be £6800
<b>Incremental cost of Council Tax at 300%</b>	Calculation at 300% Council tax The additional cost would be £10200.
<b>Planning Permission restrictions</b>	The house is freehold and there is no restriction on planning permissions for short term rentals.

<b>Business Details</b>	Single 2 bedroom cottage Rental In this specific case a 1800 two bedroom stone cottage in a rural location of Denbighshire
<b>Short Description</b>	successfully trading as a holiday let for 6 years
<b>Impact on the business of 182 threshold</b>	An increase to a 182 threshold would be very detrimental to this business indeed.  Last year we had steadily grown the lettings to 165 days , it was even progressing on an upward curve ( statistically adjusted ) through the difficult pandemic period.  However this year has shown a significant reduction in bookings as potential guests look to book abroad rather than in this country so we may well not exceed 182 this year.

	To impose significant additional costs as caused by the application of costs caused by an imposition of business would cause significant difficulties for this rental property.
<b>Personal impact</b>	In this case the rental for the property is are particularly modest and the running costs ( cleaning which is significantly higher after COVID, maintenance , Heating costs ..oil in our case ,depreciation etc etc makes on many occasions (particularly out of season) it to be non profitable There can be literally no bookings for long periods due to its location . Application of rates etc would actually make it loss making. a significant position as this is our retirement investment for income.
<b>Turnover</b>	Difficult to calculate but 2019 perhaps £2000 and 2021 £4500 profit
<b>Incremental cost of Council Tax at cost</b>	I think £1314pa for 2022/2023
<b>Incremental cost of Council Tax at 200%</b>	200% £2628
<b>Incremental cost of Council Tax at 300%</b>	300% £3842 presumably
<b>Planning Permission restrictions</b>	Not applicable
<b>Any Other comments</b>	Essentially it would make the property non viable as a rental concern as the hassle for running it would not be wise. its loss would lead to <ul style="list-style-type: none"> <li>• job loss of cleaners.</li> <li>• Loss of income to the area from outsiders from out of Wales , which is virtually all our business</li> <li>• Loss of work to local traders etc etc</li> </ul> It is a rank bad idea and does nothing to promote the area

<b>Business Details</b>	Self-catering fully furnished property in Conwy, Managed by North Wales Holiday Cottages
<b>Short Description</b>	This is a first floor property above a hair dressing salon, with two bedrooms, one single and one double, also a kitchen, shower room and lounge. It has been a holiday letting property from 10 December 2018, so only 3 years' trading.
<b>Impact on the business of 182 threshold</b>	The impact of increasing the criteria for relief to 182 days in a year's trading wouldbe that we would never qualify for the relief. The holiday season is a short one in North Wales. Our best year of trading was in 2019/2020, when it was occupied out of season while a couple were waiting to move into their new house.  The end result would be that it would no longer be financially viable, without any doubt. We would have to close it as a Holiday Let, which would also impact on not only North Wales Holiday Cottages but also the surrounding small business in the area – restaurants,

	shops, visitor attractions, zoo. There is no industry in the area and it relies heavily on the Tourist Industry.
<b>Personal impact</b>	<p>Apart from the pleasure our property gives to its visitors, and therefore satisfaction for us, in having to end the holiday let we would have to rent it out. We would not want to rent it to a private tenant because we have had so many problems with tenants – non-payment of rent, breaking terms and conditions, necessitating the need for a Court Order to evict the tenant, and subsequent repairs to the property costing thousands of pounds. As a holiday let, people only stay for a week, not enough time to inflict the damage we have had, and also, without paying first, they do not have entry to the property. The flat is not big enough to accommodate a family, and has no garden. We would most likely invite the Salon tenant to rent the property, as she had expressed an interest to rent it to increase her facilities and services in the past.</p> <p><b>In short, it would be a blow if we had to end the holiday letting.</b></p>
<b>Turnover</b>	<p>Turnover 2019 £7620 Turnover 2022 £7977</p>
<b>Incremental cost of Council Tax at cost</b>	If Council Tax were to increase by 100% we would pay £3210 (based on 2021/22 rates)
<b>Incremental cost of Council Tax at 200%</b>	200% we would pay £4815
<b>Incremental cost of Council Tax at 300%</b>	300% we would pay £6420
<b>Planning Permission restrictions</b>	The property is not limited by planning permission to only short term lettings.

<b>Business Details</b>	Holiday letting 12 persons
<b>Short Description</b>	trading around 25 years
<b>Impact on the business of 182 threshold</b>	<p>Before covid, never had such occupancy to comply with suggested new occupancy rates, despite good marketing with agency.</p> <p>With rising costs of fuel, heating and electricity, plus rising price of maintenance and repairs I won't be able to survive if business rates/council tax is increased as suggested.</p>
<b>Personal impact</b>	Would have to stop trading
<b>Turnover</b>	<p>TAX YEAR 2018 – 2019 £23,135.46 TAX YEAR 2019 – 2020 £23,942.42 TAX YEAR 2020 – 2021 £0</p>
<b>Incremental cost of Council Tax at cost</b>	Don't know
<b>Incremental cost of Council Tax at 200%</b>	Don't Know

<b>Incremental cost of Council Tax at 300%</b>	Don't Know
<b>Planning Permission restrictions</b>	

<b>Business Details</b>	<b>Two holiday cottages on Pen Llyn, converted from outbuildings at our house by us.</b>
<b>Short Description</b>	One cottage has been trading since 2013. The other cottage has been converted over winter 2021 from our B&B annex, which we first opened in 2010. All conversion work has been undertaken in conjunction with Gwynedd Council Planning and Building Regulations teams, with the sole aim of running a tourism business. The cottages are graded 4* by Visit Wales.
<b>Impact on the business of 182 threshold</b>	The tourism season on Pen Llyn runs from April to September. Outside of these months, many attractions and restaurants are closed, and the weather is not conducive to beach holidays. Our planning permission for conversion of our outbuildings restricts us to holiday lettings only. Both of our cottages are available for letting for 52 weeks of the year but, since 2013, one has only been let for 182 nights in two years: 2015 and 2018 (exactly 182 nights in 2018). This year bookings have started slowly, which seems to be reflected from other similar businesses in the area. Our new cottage does not have the benefit of repeat business, so meeting the 182 threshold will be even more difficult. Ongoing investment in the business, such as the electric car charging that we will soon be installing, is vital to encourage tourists with high disposable incomes to the area. Similar future investment would not be possible if we're paying so much Council Tax.
<b>Personal impact</b>	The property was converted over the winter from our B&B rooms, aiming to cater for changing demand. At a cost of over £40,000, this conversion was a significant outlay. To be liable to Council Tax when business is slow, and for properties which cannot legally be lived in full time, seems grossly unfair and will cause us to struggle financially in these challenging times. One cottage is a fully electric property, so with the huge increase in electricity prices we are achieving significantly less profit on every stay. 300% Council Tax would virtually wipe out my taxable income. Please don't let my livelihood become collateral damage in the battle to make second home owners pay their share.
<b>Turnover</b>	<b>Turnover 2019:</b> £13,286 <b>Turnover 2021:</b> £15,152 <i>Business on the Books 2022 (at 2/4/22):</i> £6,900 The other cottage is new this year, so no previous years' turnover information is available.
<b>Incremental cost of Council Tax at cost</b>	Only Band D figures are available on Gwynedd Council website, so assuming both properties are Band C the totals would be slightly lower than below. At 100%: £1,865.86 x 2 properties = £3,731.32
<b>Incremental cost of Council Tax at 200%</b>	At 200%: £3,731.32 x 2 properties = £7,463.44
<b>Incremental cost of Council Tax at 300%</b>	At 300%: £5,597.58 x 2 properties = £11,195.16
<b>Planning Permission restrictions</b>	Our business is limited by planning permission to short term lets only, effectively restricting lettings to the tourist season of April to September (we are available for bookings all year).



<b>Business Details</b>	Holiday cottage in Dolwyddelan, Conwy.
<b>Short Description</b>	We are a holiday cottage, sleeping four people and have been trading for four years – it was a holiday let with the previous owner for five years before we purchased it. A quiet rural location, not a ‘tourist hotspot’.
<b>Impact on the business of 182 threshold</b>	The proposed 182 day threshold will have a drastic effect on our business. We are open all year round, but not being on the regular tourist trail we never achieve 6 months occupancy, even with discounts applied. We currently average 120 So this would mean we will end up paying 300% council tax and would almost certainly lead to us having to close the business and sell the property as we could not afford to pay such an amount. This in turn would mean our cleaner in the village losing her job, also the local log supplier losing trade, as well as the local shop, pub and hotel would all lose trade as we know our guests – and ourselves - spend money in the village, as well as further afield, contributing to the local economy and helping to sustain jobs. Since buying the cottage we have invested a considerable amount of our own money carrying out improvements – using the local builder – we were hoping this program could continue but this is now of course in doubt. We know from what we are seeing in the various online communities we are part of that there is huge concern over these proposals because many cottage owners are in similar situations to ourselves. With the cost of living crises having an effect on families disposable income we can see it becoming increasingly difficult to let cottages as hard pressed families prioritise their spending and so this proposal only adds to what is already going to be a tough time for cottage owners.
<b>Personal impact</b>	On a personal level having to close the business would be a terrible blow for us. It is hurtful to hear members of the Welsh government make statements such as ‘ if people can afford second homes they can afford to pay the increase’. We are by no means wealthy people, our cottage is the result of a lifetime of hard work by both of us – Julie is a nurse in the NHS with over 40 years service and I worked for almost 40 years in the water industry. We purchased the cottage with our retirement money. It was of course a dream come true – we love north Wales and visited often before we had our property – so to actually own a place in somewhere we love was absolutely wonderful. But as we have said, we are not wealthy people – so in order to maintain it we have to let it out – and if the proposed charges are applied it would not be financially viable. <b>We currently average 120 days let per year.</b>

<b>Turnover</b>	Turnover for 2019 was £6,800 – for 2021 it was £7,500 - money in <b>before</b> expenses.
<b>Incremental cost of Council Tax at cost</b>	If we were not on business rates we would be paying circa £1,600 p.a in council tax.
<b>Incremental cost of Council Tax at 200%</b>	At 200% it would be circa £3,200 p.a
<b>Incremental cost of Council Tax at 300%</b>	At 300% it would be £4,800 p.a
<b>Planning Permission restrictions</b>	There are no restrictions on the letting arrangements

<b>Business Details</b>	We are the owners of a Holiday Rental property in the countryside above Abergele in the county of Conwy
<b>Short Description</b>	we have been in business for 15 years. After converting an old cow shed into a delightful 3 bedroom holiday let for 6 visitors to this beautiful part of North Wales we opened in 2007 to begin welcoming guests. Over the last 15 years we have worked extremely hard to provide a welcoming holiday retreat for our guests, a lot with young families, as well as for people travelling for business in the area.
<b>Impact on the business of 182 threshold</b>	During the past 2 years due to COVID restrictions we have all seen a fall in the number of bookings. During 2019 the number of nights booked at our property was 183, during 2020 this was down to only 125. Meaning we would, through no fault of our own, have fallen into the proposed 182 threshold and paying out a lot more than we brought in. We market our property through various agencies to whom we have to pay commission for bookings received, plus advertising revenue to sell the area to potential visitors. Due to the high rise in utility bills so far this year (oil & electricity) the rise in council services for Trade Recycling and Trade Refuse, Water Rates, Corporation Tax, Laundry services and Property & Contents insurance we have had to increase our prices considerably more for 2022 than our usual 3% and will have to implement a further price increase again next year on top of our normal 3% which will certainly impact our bookings.
<b>Personal impact</b>	Our business is run by my husband and myself and we are open 12 months of the year. We would be devastated to see all our hard work and investments over the last 15 years have been for nothing and be forced to close our business down. We brought a derelict old farm building back into use as a beautiful holiday cottage resulting in hundreds of visitors coming to stay in the area every year bringing with them a large amount of much needed revenue and footfall to Conwy, in the form of eating out in local pubs and restaurant, visitor attractions etc.
<b>Turnover</b>	Our pre-tax figure in 2019 was £15,858 - 2021 is pending
<b>Incremental cost of Council Tax at cost</b>	£2450 rateable value p/a

<b>Incremental cost of Council Tax at 200%</b>	£7350 rateable value p/a
<b>Incremental cost of Council Tax at 300%</b>	£9800 rateable value p/a
<b>Planning Permission restrictions</b>	We have no restrictions

<b>Business Details</b>	Cottage on Deganwy Beach, Conwy.
<b>Short Description</b>	Self catering holiday cottage and have been letting to guests since June 2018
<b>Impact on the business of 182 threshold</b>	<p>The 182 days booked I think would be impossible to achieve. I use a local holiday letting company, North Wales Holiday Cottages who have over 50 years experience and have won awards for customer service. As well as being advertised on their website they also advertise my property on 3 other holiday booking platforms, booking.com, visit Wales.com, last minute cottages.co.uk.</p> <p>I have a 4 star rating from visit Wales and good customer reviews but even so for financial year 22/23 to date I have only 77 days booked. I have now built a guest list of people who stayed at Glan Afon who want to book again and any issues raised by guests I try to respond as soon as possible.</p> <p>I use local tradespeople/ businesses for cleaning and any maintenance issues and gas/electric safety certificate's . Whenever items need to get replaced I try to buy from local shops/suppliers to put money into the local economy.</p> <p>If I have to accept more out of season bookings to hit the proposed target then I will definitely make a loss as I pay 20% &amp; vat to North Wales holiday cottages and £80 &amp; vat to maid in north Wales for cleaning last year on a week in winter that left me with £80 once you take out the rising costs of gas, electric water, broadband, insurance, maintenance wear and tear I will paying guests to visit. Also would need to leave the heating on constantly just in case I had a booking which is expensive and not good for the environment.</p>
<b>Personal impact</b>	<p>The impact to me personally is huge, I retired aged 60 2 years ago and the income from this is to help it pay for itself as I don't have any other income until my old age pension at 66.</p> <p>If the proposal to increase council tax 200 - 300% was implemented and I am unable to meet the criteria for non domestic rates I would have to sell the property as it would be financially impossible to afford to keep it.</p>
<b>Turnover</b>	Turnover for 19/20 9,319.40 20/21 3,289 due to covid closure
<b>Incremental cost of Council Tax at cost</b>	Council Tax band D Conwy Council is approximately 1,803.14

<b>Incremental cost of Council Tax at 200%</b>	£5,409.42
<b>Incremental cost of Council Tax at 300%</b>	£7,213.68
<b>Planning Permission restrictions</b>	
<b>Business Details</b>	Holiday letting agency for properties across North Wales
<b>Short Description</b>	My business was formed over 50 years ago and has been letting out holiday properties ever since. We offer all types of properties for let on our website from apartments to large properties, from rural locations to town centres and we are open all year round. Our office is in Deganwy and we employ 8 staff in a variety of roles including customer service, property inspectors, accounting, marketing and software development. We typically average around 150 properties on our books but have had up to 180. The property owners operate their properties on a commercial basis.
<b>Impact on the business of 182 threshold</b>	<p>The average number of days let across the agency is 135 per property each year. The percentage of properties which meet or exceed the 182 days is 12%. There are several reasons that properties do not reach this threshold:</p> <ol style="list-style-type: none"> <li>1. Seasonality – from October to Easter the demand is much lower than the rest of the year, especially in rural areas where guests may have less to do in winter than in towns.</li> <li>2. Length of booking – there is a trend towards short stay of 2 to 3 days, typically over the weekend, and it is very difficult to sell the remaining weekdays due to little demand. People will visit over the weekend so they don't use their holiday allowance or reduce their costs so they can have another holiday in the year. This is most prevalent in larger properties when it may be difficult to arrange a whole week for 8, 10, 12+ people to holiday for that long at the same time. 52 weeks of 3 day bookings will only give you 156 days.</li> <li>3. Expense – a holiday in the UK will often be more expensive than in Europe which has better weather and is seen as a more attractive destination with guaranteed sunshine</li> <li>4. Planning Permission – some properties are restricted by planning permission to the number of days they are permitted to open.</li> </ol>
<b>Personal impact</b>	The holiday letting market is very competitive, we work with the property owners to make sure the properties are of a high quality. They invest in their properties, employ local traders and the services of cleaners, housekeepers, laundry services, gardeners, etc. If the majority of properties are not able to reach the 182 day threshold, the operating costs of these businesses

	<p>will increase significantly and put them at a disadvantage compared to other accommodation providers like Bed and Breakfasts or hotels, or other properties in the UK. Property owners using our agency have expressed concern about the proposed threshold and their opinion that it may not be viable to continue letting.</p> <p>We continually invest in technology and marketing to encourage guests to book. All our staff are paid the real living wage or higher. If we were to see a significant drop in the number of properties we let, we would have to make redundancies as staff costs are our largest expense. In the extreme scenario where only the 12% of properties that reach the threshold remained with us, the business would not be viable.</p>
<b>Turnover</b>	2021 - £1.9 million
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	

<b>Business Details</b>	Stand alone House with large private gardens available as a holiday let since July 2021 in Llangollen
<b>Short Description</b>	House is located a 250m distance from the main high street with close proximity to Plas Newydd and the rural valley. Spacious holiday let, sleeps 6 (3 bedrooms) Pets welcome. (The house was left to me by my late mother. I was born there and have just spent the last 5 years saving to restore it as a holiday let.)
<b>Impact on the business of 182 threshold</b>	The impact on my business will be huge. I struggle to fill a 'Sleeps 6' property other than in school holiday times when families are prepared to rent it for one week. There are only 91 days of school holiday every year, so meeting the 182 threshold will be impossible as weekend guests to North Wales are rarely parties of 6 off-peak. I will have to lower the cost of weekend stays to attract couples and a competitive weekend rent for a couple staying does not cover the weekly cost of cleaning a large house and the upkeep of the garden.
<b>Personal impact</b>	Since inheriting the house in 2015(I was born there and hope to retire there), I have paid very high council tax rates for what was considered a 2nd home. The house needed completely renovating as the windows were rotten and it would not have passed health and safety standards for renting out or living in. Because of the high council tax band and bill, I could not afford the renovations even though my intention was to run it as a holiday let. I cashed in £80,000 of my pension savings to complete the renovations with the hope that by running it as a holiday let business I could recoup the funds I'd

	spent on it before I am ready to retire. It is unlikely that I will fulfill the 182 days and therefore will never be able to recoup my pension savings that I have worked hard all my life to secure. Given that 90+ private houses were allowed to be built on a plot near-by selling for £300-£500,000 with no attempt from the council to ensure any part of that build was 'affordable housing', I am struggling to understand the intention of the government with this initiative other than raise more revenue and risk dissuading many, many tourists (and especially families) to visit Wales.
<b>Turnover</b>	The house was being renovated in 2019. In the 6 months it was available in 2021, the income was a just over £17,000
<b>Incremental cost of Council Tax at cost</b>	Band G £4,548.00. based on 2nd home
<b>Incremental cost of Council Tax at 200%</b>	£6,064
<b>Incremental cost of Council Tax at 300%</b>	£9,096
<b>Planning Permission restrictions</b>	The house is on a junction on the fork of the road. It is a one family house with entry to the property at a dangerous point on the road and narrow lanes and blind bends. When the most most recent building was allowed (the 90 house plot on Vicarage Road) there were strict rules in place from the council as to traffic entry and exit.

<b>Business Details</b>	2 holiday lets trading 6 years. 1 x sleeps 10 in Rowen rural and 1 x sleeps 4 in Trearddur Bay, Anglesey
<b>Short Description</b>	Coastal
<b>Impact on the business of 182 threshold</b>	<p>The holiday let in Rowen will be fine as it can sleep large groups of walkers, families and friends so we get bookings all year round. The holiday let in Trearddur Bay won't reach 182 because it only sleeps 4 (ie a small family or 2 couples), is coastal, very dependent upon good weather and school holidays as the blue flag beach is the main attraction. Bookings are a feast or a famine. During the school holidays demand outstrips supply but school holidays only account for 73 days;</p> <p>a. Summer holidays = 42 days  b. Easter = 14 days 50% occupancy if lucky = 7 days  c. Half terms x 2 = 14 days  d May bank holidays = 10 days if 100% occupancy  e Xmas and New Year do not sell as the weather is so cold and windy at that time of year.</p> <p>We are getting approx 110 days per year max as we got ad hoc short breaks in 2021 outside school holidays spring, summer and autumn. For 2022 we have tried just allowing 7 day bookings April - September and it does not work, 1 x 7 day booking since Xmas. This weekend we</p>

	have had to revert back to a minimum of 2 nights stays outside of school holidays, to try and boost our bookings.
<b>Personal impact</b>	We would have to stop using the apartment in Trearddur Bay as a holiday let and it would get used less often. I am a former senior accountant in the Welsh Public Sector and strongly believe in buying locally to support your local economy. We are aware some owners are abusing the current system, giving us all a bad reputation and it does have to stop but this is not the way to do it, a regulated registration scheme is, improving standards across the industry. We invested significantly in this apartment in April 2021, it wasn't an inheritance and you can see from our ratings 19 reviews all 5 star, what an asset this property is to Welsh Tourism, promoting high quality and family friendly accommodation. I would be very upset to stop the ladies who clean it and live locally, they would lose their jobs. I would also be concerned to stop using Holyhead Laundry services. They do a fantastic job, collecting, washing, ironing and delivering our laundry. They have recently expanded and occupy one of the new large industrial units and employ lots of people locally in a highly deprived area. The local restaurants and attractions would also lose out from the custom our guests contribute to their local businesses. We run 3 successful businesses in Wales besides the holiday lets and we have never had to make anyone unemployed so the prospect is quite distressing actually.
<b>Turnover</b>	Rowen 2019 £42k Rowen 2021 £46k (before agent's commission) TBay 2019 (not opened then) TBay 2021 £12.5k (before agent's commission).
<b>Incremental cost of Council Tax at cost</b>	Rowen Band E £2,755 (currently 125%) 6% of turnover TBay Band B £1,797 (currently 135%) 14.4% of turnover. The lower the band (as you attract less rental income) the harder the charge will impact on the business. I attach our anonymous draft accounts for the first year trading at TBay and we have only just broken even, this smaller holiday let business cannot cope with an additional charge of £1,800 plus the impending rising energy costs, increasing mortgage interest rates and inflation running at its highest for years. Turnover will grow as we become established but not to the extent required to cope with any additional charges of this magnitude or to 182 days, it is simply not realistic or sustainable. These businesses are not the cash cow politicians incorrectly assume they are. I worked in the civil service and local government for over 30 years and know first hand politicians and policy making civil servants are usually academics, not experienced business people. Successful business owners, like ourselves, create jobs and wealth in the local economy but only if and

	when they are allowed to make a reasonable profit, instead of being at the sharp end of unworkable idealistic policies. A serious rethink is required very quickly before the Welsh Tourism industry is damaged permanently beyond repair, to the detriment of local economies who badly need the jobs the tourist industry brings, especially families with children of school age who need part time work. I know money is very tight and people are abusing the current system but a compulsory, regulated (Gas safety checks, Electrical safety checks, which good owners do anyway etc), registered holiday let scheme with a ratings system, would push out the fraudsters, improve standards, increase the tourists experience of staying in Wales and hopefully they then return year after year.
<b>Incremental cost of Council Tax at 200%</b>	Tax Rowen Band E £4,408 9.6% turnover (before agent's commission) TBay Band B £2,662 21.3% turnover (before agent's commission)
<b>Incremental cost of Council Tax at 300%</b>	Rowen Band E £6,612 14.4% of turnover (before agent's commission) TBay Band B £3,993 32% turnover (before agent's commission)
<b>Planning Permission restrictions</b>	None that we are aware of.
<b>Any Other Comments</b>	I should also have said, the reason why so many people have opened up as holiday lets instead of renting their property out (buy to lets) and use the loopholes they do to avoid paying Council Tax is simply because this sector of the tourism industry is unregulated.

<b>Business Details</b>	A conversion that features my home and two holiday apartments each with two bedrooms in Penygroes, Gwynedd.
<b>Short Description</b>	The property is situated in a rural location 1 mile inland. I have been trading since September 2018.
<b>Impact on the business of 182 threshold</b>	Based on the occupancy levels I achieved to date, I would expect to achieve the 182 day threshold in most years. The apartments are available to rent 365 days per year. However, like any owner of holiday accommodation, I cannot guarantee that I will obtain the bookings I am looking for. There are several factors that can impact bookings that are partly or wholly out of my control: <ul style="list-style-type: none"> <li>• A decline in the popularity of staycations</li> <li>• Persistent bad weather (many bookings are made at short notice)</li> <li>• Essential repairs to the property or access road following extreme weather (the lane on which my property is located has been washed away by surface water three times in the last four years and we have been struck by lightning).</li> <li>• Short notice cancellations due to Covid-19</li> <li>• Flight cancellations and other travel issues experienced by guests</li> </ul>



	<ul style="list-style-type: none"> <li>• Economic factors such as inflation and rising fuel costs causing fewer people to book holidays.</li> <li>• Many attractions in North Wales are not open during the autumn and winter months. This limits interest in the region during those periods.</li> </ul> <p>Failure to achieve the 182 day threshold, and therefore having to pay council tax, would be extremely problematic for the business. The cost of operating the holiday apartments is now rising dramatically due to increased energy bills. Any additional costs could potentially be devastating. While energy costs are related to occupancy levels, council tax would be a fixed charge and therefore could become a disproportionately high percentage of my overheads. It would be incredibly unfair to find oneself with a huge additional cost if the threshold was missed by just a couple of days. It is an all or nothing scenario which is ridiculous.</p>
<b>Personal impact</b>	<p>The proposed new threshold of 182 days is extremely concerning. My business is open all year but for the reasons mentioned above, I could fail to achieve the required occupancy through no fault of my own. The need to achieve the threshold would cause a great deal of stress. I rely on the business for my income and the business may not be viable if the costs of running it were to significantly increase.</p> <p>I am very distressed about the future. I relocated to North Wales and invested everything I had into buying my home and the holiday apartments. I carefully assessed the costs of running the business and now the goalposts may be moved. I have been saving up to redevelop a further property in North Wales, but I would not do this if I were forced to pay council tax and at a premium, in addition to paying a premium on land tax. The prospect of the additional costs is effectively preventing me from expanding my business in North Wales and I will be forced to invest elsewhere. I am very concerned for the future as I purchased the holiday apartments to fund my retirement. I may have to consider moving elsewhere as I need a viable business to provide my income.</p>
<b>Turnover</b>	<p>2019: £19,452 2021: £32,172 (operating costs approximately £5,000)</p>
<b>Incremental cost of Council Tax at cost</b>	<p>It is difficult to estimate the council tax I might have to pay. My property features my home and the two apartments. Prior to opening the apartments, the building was treated as one property for council tax purposes. Would that still be the case?</p> <p>Council tax for apartments if treated as a single property £630 Council tax if apartments taxed separately £2518</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>Council tax for apartments if treated as a single property @200% £1260 Council tax if apartments taxed separately @200% £5036</p>

<b>Incremental cost of Council Tax at 300%</b>	Council tax for apartments if treated as a single property @300% £1890 Council tax if apartments taxed separately @300% £7554
<b>Planning Permission restrictions</b>	Planning permission for the apartments restrict lettings to periods of 30 days or less.
<b>Any Other Comments</b>	<p>After sending my case study, something occurred to me. If owners of holiday accommodation feared that they would not meet the threshold of 182 days, I am sure most would offer their accommodation at reduced rates to get the bookings they need. I would! What level of price reduction could be offered? For instance, could owners offer their accommodation for £10 per week? Would the powers that be then say that this was not a legitimate rental? Would owners be forced to charge a certain amount? I think this would be unfair as other types of business are permitted to charge what they wish for their goods and services.</p> <p>I am perplexed by the Welsh Government's attitude to holiday accommodation businesses. Since opening my business, I have been made to feel most unwelcome in North Wales by the comments and actions of the Welsh Government and Gwynedd Council. In addition to the holiday lets, myself and my partner operate 3 further businesses in Gwynedd but are now considering leaving. The authorities are so short sighted here. I have spent £120,000 with local suppliers in renovating and furnishing my property. I have always bought everything from local businesses and tradespeople where possible. I am beginning to wish I hadn't bothered.</p>

<b>Business Details</b>	A Cottage in Llangefni, Anglesey owned by our family
<b>Short Description</b>	It is a 2 bedroomed cottage with an enclosed garden. In a rural location in the grounds of a former large country house, it is well away from the main road but only a short drive away from shops etc. This makes it a safe and ideal location for families to whom we have been letting the Cottage since 2010.
<b>Impact on the business of 182 threshold</b>	The Cottage is available to let all year but the proposed increase in the number days it would need to be let to qualify for business rates is unrealistic. We rely heavily on family bookings and as it is almost impossible for families to take holidays during term time, they are restricted to school holidays which total 91 days (13 weeks). This leaves the remaining 91 days to be let to people without children. We therefore feel that the 182 days will be a restriction that is beyond our ability to meet.
<b>Personal impact</b>	We only have this one Cottage and everything we earn from the holiday lets is ploughed back into the upkeep of the building and its contents to ensure it continues to meet its four star standard. To be candid, we feel that it will be an impossible task to meet the new requirements. The last council tax bill for the property in 2019 was approximately £2300. No doubt the amount in 2023 will be considerably

	more and if there is then the potential of a 300% increase it will effectively make our business unviable and we will probably be forced to sell.
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	

<b>Business Details</b>	Single holiday cottage, sleeps six. Located close to Aberdaron, Llyn Peninsula (Rural coastal).
<b>Short Description</b>	Trading since 2004. Bought as an established holiday let. Qualified as FHL from outset. Benefits from SBRR 100% discount.
<b>Impact on the business of 182 threshold</b>	<p>Bought to provide income, I am now retired from full-time work and in my 19th letting season. Over the past six years (excluding 2020/21 Covid impact) I have averaged 150 nights actually let/365 available), ranging from 126 to 177 nights (post Covid. I believe this to be better than average occupancy for this size property in this highly seasonal coastal area.</p> <p>Increasing the threshold to 182 nights would, in my view, be impossible to achieve consistently in this property and this location. Most suited to family groups or friends, whilst it does attract some couples these are relatively small in number due to property size. It is 15 miles from the closest town (Pwllheli), and from October to April there are very few amenities open in Aberdaron to attract visitors – over this past winter only one (of two) pub, a Spar shop, and part-time bakery remained open. All cafes and take-away venues were closed, as was the second pub.</p>
<b>Personal impact</b>	Inability to continue to operate FHL, and forced sale of the property if it became liable for Council tax with 200% or 300% premium. I have invested hugely, both financially and emotionally, for 18+ years in my property, and this would be devastating to me, plus I would lose a source of income on which I rely in retirement. I am terrified at this prospect!
<b>Turnover</b>	£12,660 in 2019 £19,185 in 2021
<b>Incremental cost of Council Tax at cost</b>	100% PREMIUM (APPLIES NOW IN GWYNEDD): £3740
<b>Incremental cost of Council Tax at 200%</b>	£5,610
<b>Incremental cost of Council Tax at 300%</b>	£7,480

<b>Planning Permission restrictions</b>	None
<b>Any Other Comments</b>	None

<b>Business Details</b>	One holiday cottage on the edge of Beaumaris, with sea and mountain views. Anglesey.
<b>Short Description</b>	<p>Sleeps 6 - 3 bedrooms, 2 bathrooms, large sitting room with open fire, kitchen, playroom, utility area and two gardens.</p> <p>Trading since 2014.</p>
<b>Impact on the business of 182 threshold</b>	<p>I have recently set up my own website and am not totally reliant on an Agent securing my bookings. I have therefore joined Premier Cottage, Cool Stays and worked hard on my own SEO to ensure searches also pulled my website up directly. As a result of the extra weekend bookings, during the shoulder months, I have gone from an average of 200 days to 262 in this last financial year, 2021/22.</p> <p>My property is on the edge of a very busy and popular town and has historically always been busy from end March – start of October plus the October and February half terms, Christmas and New Year, This coming 2022/23 financial year I am fully booked until mid October, a total of 210 days. Hopefully a few more bookings will come in during the Winter – these are usually fairly close to the arrival dates and are weather dependent. I have taken 2 bookings for 2023 already. Whether the improvement in bookings is as a result of Covid restrictions being lifted and guests needing to get away, or whether this will continue to be the trend is unknown – and with this new restriction of a minimum of 182 days a very real worry. Remember some bookings were moved from dates when we had to close so this year’s bookings may not be a true reflection at all.</p>
<b>Personal impact</b>	<p>This is my sole income. It is not a second home that I rent out – it is a business that is open 365/year.</p> <p>If I wasn’t married to someone that had another income stream I would struggle to raise 3 children on the income that I receive after all costs/ expenses that arise (and will be increasing with energy prices doubling).</p> <p>I don’t wish to rent it out any other way as the last time we had tenants they wrecked it. It was heart-breaking. I don’t want to sell either as our cottage has been in the family for generations, they built it. It means an awful lot to us.</p> <p>I am passionate about where I live and know that without dedicated holiday lets the income coming to our town, indeed the whole island, will be seriously impacted. We rely on tourists. A lot of jobs would be lost, entrepreneurial businesses would not open and there would be a serious decline in the opportunities this area has to offer re jobs. Without jobs people cannot afford</p>

	houses either – getting rid of holiday let businesses (not second homes – that is a completely different subject and the two types of holiday lets need to be looked at separately NOT under one umbrella of misunderstanding ) we will be shooting ourselves in the foot yet again and all progress will reverse. What is needed is more affordable housing – see point 10 for an example of the mixed messages that we are given in this area.
<b>Turnover</b>	2019 around £29,500 2020 around £36,000 2021 around £42,500 Remembering that profit/actual earnings is a very different figure to turnover.
<b>Incremental cost of Council Tax at cost</b>	Around £2568 (I don't have this coming year's figure this is 2021/22)
<b>Incremental cost of Council Tax at 200%</b>	£5136 (based on 2021/22)
<b>Incremental cost of Council Tax at 300%</b>	£7704 (based on 2021/22)
<b>Planning Permission restrictions</b>	No I am not BUT I would like it noted that I know of 2 properties who have asked for planning permission and both have been granted on the proviso that they become holiday lets! Neither owner wishes them to be a holiday let – they both want locals to live in the renovated properties. It makes no sense whatsoever to be going through what we are going through and then be told this.
<b>Any Other Comments</b>	

<b>Business Details</b>	Single holiday cottage, rural location, traded as holiday let for 15 years (2000-2015) then let residentially for 5 years to a neighbour who had lost his home, St Brides, Pembrokeshire.
<b>Short Description</b>	Due to the location of the property in our garden we cannot let it as a residential let to someone we do not know. We therefore reinstated it as a holiday let on March 27th 2021.
<b>Impact on the business of 182 threshold</b>	During the full extent of the 16 years as a holiday let our Cottage has been available all year round except for two to three weeks needed each year for maintenance. From 2000-2015 its occupancy averaged 15-20 weeks a year (105 - 140 days). Even in 2021, the bumper year for holiday let businesses due to COVID, it still only achieved 161 days.
<b>Personal impact</b>	The impact on us personally, should the Welsh Government make these changes & Pembrokeshire County Council choose to implement them, would be life changing because of the significant drain on our income. Our Cottage came as an annexe to our home when we purchased it in 1998. The surveyor noted that the rent from it as a holiday let would help pay towards the upkeep of our home, especially as in our location we are

	so vulnerable to the storm ridden winters that are now the norm. We are retired & live off our savings and government pension; without the full extra income from our Cottage, we could not guarantee being able to stay here. A residential let is totally inappropriate. The close proximity of the Cottage to our home means that we are vulnerable to any undesirable behaviour in which the occupants might indulge, especially as we are getting older & our nearest neighbour ½ mile away. A holiday let occupant is a transient visitor; we could never risk the potential problems that might arise from a residential let, the only alternative option available to us. The ultimate impact on us might be that we shall have to sell our home.
<b>Turnover</b>	In 2019 we had no turnover as a holiday let. In 2021 our gross turnover was £17760.00. Following agents fees and management fees (necessary because of our age) this sum realistically became a turnover of £11441.94
<b>Incremental cost of Council Tax at cost</b>	We would have to pay £2736.60 if we were on Council Tax (Property Band C plus second home premium) rather than Business Rates and benefiting from SBRR (Small Business Rates Relief)
<b>Incremental cost of Council Tax at 200%</b>	We would pay £ 3331.14 with the second home premium at 200% Council Tax
<b>Incremental cost of Council Tax at 300%</b>	We would pay £ 5473.20 with the second home premium at 300% Council Tax
<b>Planning Permission restrictions</b>	Planning restrictions on the Cottage mean that it cannot be sold except as a part of our home. Regardless of this restriction, it is now classed as a second home by Pembrokeshire County Council.
<b>Any Other Comments</b>	

<b>Business Details</b>	Detached, 4 bedroom house, sleeps up to 8, rural/coastal location in Tenby, Pembrokeshire.
<b>Short Description</b>	trading for 19 years.
<b>Impact on the business of 182 threshold</b>	182 would be unachievable. 90% of our guests are represented by multigenerational family groups, most of which are only able to travel during school holidays. Smaller groups tend to give us a miss in the mistaken belief that they would save money by occupying a property with fewer bedrooms. Were the 182 day rule to be introduced we would almost certainly call it a day. In the meantime, we are committed to providing a high standard of accommodation and value for money to our guests, treating our extensive support team fairly and to making a valuable contribution to the local economy. To that end, we alone can speak for over 800 overnight tourist trips per annum. We think that is something to be proud of.
<b>Personal impact</b>	Losing the income we derive from our letting activities would have a significant effect on our standard of living

	as it is our primary source of income in retirement. Moreover, we took out an interest only buy to let mortgage some years ago to fund home improvements, primarily for the benefit of our guests. Were we to cease trading, our lender would not be in a position to renew the facility. In addition to providing an income, the property is also our home. We occupy the property for c5 months of the year- typically, November to Easter - and house sit during our letting season. Our inability to trade would have serious implications and could lead to the loss of our home.
<b>Turnover</b>	T/o 2019 £14,695, 2021 £24,786
<b>Incremental cost of Council Tax at cost</b>	£2631
<b>Incremental cost of Council Tax at 200%</b>	£5262
<b>Incremental cost of Council Tax at 300%</b>	£7893
<b>Planning Permission restrictions</b>	No planning restrictions apply to our letting activities.
<b>Any Other Comments</b>	

<b>Business Details</b>	I have a 4 bedroomed holiday let in Aberystwyth.
<b>Short Description</b>	
<b>Impact on the business of 182 threshold</b>	<p>The proposed change to 182 days let will be impossible for me. People normally book 3 or 4 nights, as they are visiting Aberystwyth for weddings, funerals, to visit children at University, a weekend break or to attend some event in the area. At most they stay a week, almost never longer. To achieve 182 let days with so many short lets and the fact that people do not go away in the months October to April will be impossible.</p> <p>2020 was a covid nightmare. Wales was closed for months, so that I couldn't even visit my own property or let it. 2021 was a very unusual year because of covid and staycations. People do not usually come to Wales for annual holidays, but they had little alternative in 2021. I find that most people that I speak to know little about Wales. The most common comment is "it always rains in Wales". I cannot see that now that people can travel abroad, Wales will be so popular, and rental numbers will drop considerably.</p>
<b>Personal impact</b>	If these proposals go ahead, I will have to consider ceasing holiday lettings and selling the house, that I have owned for over 30 years. During this time, I have spent tens of thousands of pounds in Wales and the holidaymakers have done the same. I feel totally let down by these Welsh Government proposals. I seem to be being treated as the enemy. I think that if these proposals go through, Visit Wales should be renamed DON'T VISIT WALES, as

	holidaymakers and second home owners are being treated as pariahs rather than valued visitors.
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	Council tax on my house is £2000+ per annum.
<b>Incremental cost of Council Tax at 200%</b>	£4000+
<b>Incremental cost of Council Tax at 300%</b>	£6000+
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	I hope that the Welsh Government come to their senses, and work through all of the consequences of their actions. They should realise that tourism makes a positive and valuable contribution to Welsh life and the economy.

<b>Business Details</b>	a converted chapel house in a very remote location on the mountainside near Llanfachreth, Gwynedd
<b>Short Description</b>	The house has 5 beds but only 1 enclosed bedroom, the rest of the beds are on a mezzanine platform and enclosed by curtains. The house has been commercially let with an agency for at least 17 years by my family, and long before that by the previous owners. It has a large open plan space that was once the chapel and still contains the original pulpit, plus a small adjoining section that was originally the accommodation.
<b>Impact on the business of 182 threshold</b>	<p>If the threshold for occupied nights is raised to 182 we will be unable to meet this requirement. Despite being available for at least 300 nights per year and the house being in a stunning location, the remoteness and location means that it's not occupied year-round. It tends to attract nature lovers and hikers who prefer to visit the area in the warmer months. If we are forced to pay council tax this will likely mean the business is no longer viable for my family to keep running as a holiday let. We will probably be forced to sell the house.</p> <p>The house is not a suitable layout to be a family home. The main 'house' section comprises one small bedroom, a bathroom and kitchen. The chapel space has been converted to offer a dining area and further sleeping zones on a mezzanine level. As a result of this, coupled with its very remote location, it is unlikely to be bought as a dwelling for a local family. It is highly likely that another buyer - who can afford to continue paying the council tax - will own it as a second home.</p>
<b>Personal impact</b>	I am a working parent of 3 small boys. I inherited this house from my mother who owned it for many years, and shortly after inheriting it my father died and the running of the holiday let fell to me. I have spent the last 3 years bringing the property up to a more modern standard,



	<p>with many new furnishings and fittings. I have dedicated a lot of time and my own finances to improving the house, and have not yet made much profit because of this. Now that my children have started school, I have been looking forward to finally dedicating more time to the running of the business and making it more profitable.</p> <p>Prior to owning the house myself, I have spent many happy years visiting for holidays with my husband and then later with our 3 children. All of my extended family and many of our friends have also regularly stayed. We absolutely love the house and the area, and cannot imagine no longer having this connection. I have hoped to continue bringing my boys to this special house for years and have always imagined it being an integral part of their childhood.</p> <p>If I am forced to sell the house, I will be utterly devastated. It's a connection to my parents and a very special place that I will be heartbroken to part with in such a way.</p>
<b>Turnover</b>	<p>2018/19 turnover - £7447  2020/21 turnover - £7647  2021/22 turnover - £15465</p>
<b>Incremental cost of Council Tax at cost</b>	Estimated council tax £1777 per year
<b>Incremental cost of Council Tax at 200%</b>	Estimated 200% Council Tax £3554 per year
<b>Incremental cost of Council Tax at 300%</b>	Estimated 300% Council Tax £5331 per year
<b>Planning Permission restrictions</b>	I am not aware of any planning restrictions.
<b>Any Other Comments</b>	

<b>Business Details</b>	My husband and I have owned a property in Barmouth since September 2007 and it has always been available as a holiday let 365 days a year.
<b>Short Description</b>	I am half Welsh. My father was Welsh and my grandfather was in the Welsh Fusiliers during World War II. My family has had a presence in Barmouth since then. I live in England. We purchased a property which was in need of attention and have spent many thousands of pounds doing so, always employing local trades, from plasterers, electricians and plumbers to roofers. Local cleaners have also been employed throughout the years.
<b>Impact on the business of 182 threshold</b>	We initially paid residential council tax (unaware of the business rates option) and were very happy to do so. It was only when it was proposed to increase it for 'second home owners' that we were advised (we read a newspaper article) to register for business rates in 2016. We understood this would be less than the residential

	<p>Council tax but hadn't expected it to be in a nil band business rates area! In fact we would be happy to pay a reasonable amount of business rates. By increasing the residential Council tax, the Council effectively encouraged owners of self-catering properties to register for business rates and have the right to do so if they meet the criteria. It must be remembered that businesses still have to pay for refuse collection. Our bill this year is £428.00.</p> <p>It is my feeling that all self-catering properties should be available to let all year round. Increasing the proposed actual days let to 182, however, may be too high.</p> <p>We have been letting our property for almost 15 years and just about meet the proposed letting days most years. Our figures for actual total letting days vary, for example:</p> <p>155 days in 2017  207 days in 2018  170 days in 2019  194 days in 2020  and then 65 days in 2021 (for obvious reasons a lot less!).</p>
<p><b>Personal impact</b></p>	<p>We have always actively marketed the property, from being accredited by Visit Wales, advertising in the Barmouth brochure, ebay sales, stay in wales website, our own website and newspaper/magazine advertising in the early days. With the onset and popularity of Airbnb we reluctantly moved to marketing on that platform. However, ironically, our lettings have decreased. I see the reason for this is the market is now saturated with more availability in the town at cheaper rates. Hence going forward the actual days let may be difficult to achieve if they are increased to those proposed. I think the way forward would be to license lettings to ensure standards and transparency. Yearly Accounts and supporting information are required to be presented to the Rating Valuation Office usually every 3 years so I cannot understand how 'second home owners' are 'getting away with paying nothing'.</p> <p>A genuine holiday letting business brings many thousands of pounds into the town. I have families who return year after year with their holiday spending budgets. If the Council increased the letting days as proposed we may not quite meet the criteria each year. We will then have to switch to residential Council tax but still let the property to pay for it. I feel this is discriminatory to what is labelled 'second home owners' who in reality actually run a self-catering holiday let. We own 1 home in England and 1 holiday let business in Wales.</p> <p>If we choose to sell the property, it would undoubtedly go as another holiday let. It is a very old property, expensive to maintain and run, has no parking and access is not</p>

	easy so I cannot see it as an ideal young family home. However, it is attractive to holiday makers.
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	As a final thought I would very much wish to see affordable housing built in the area but there is never any evidence of this either in Barmouth or the neighbouring towns I visit. If the Council can show where it is investing in new housing I would thoroughly support a reasonable increase in the Council tax but not by 300%.

<b>Business Details</b>	Two bedroomed holiday chalet available for holiday letting in a rural location of Penbryn, Sarnau, Llandysul.
<b>Short Description</b>	Winter lettings December to March are not encouraged because the property has storage heaters which on their own do not heat the property to a comfortable level for occupation in very cold winter weather. It has been let for holidays for approximately 30 years and has never been occupied as a permanent home since it was converted from from an agricultural building in the early 1990s, to the owners knowledge. The rooms are small and the chalet lends itself to holidays, not year round permanent occupation.
<b>Impact on the business of 182 threshold</b>	The impact on the business of the 182 threshold is that it would be unlikely to be eligible for small Business rates relief . The letting days last year were 182; however this was an unusually high year for bookings because of the covid restrictions on foreign travel and hence greater demand for UK holidays; in previous years the total nights let have been at a lower level, above the current threshold but below 182. Bookings so far this year are at a lower level than last year.
<b>Personal impact</b>	Without the small business rates relief, this business would not be viable, particularly with the soaring electricity costs as well. This chalet relies totally on electricity for heating. It's construction does not lend itself to good insulation to retain heat in winter.
<b>Turnover</b>	Our turnover in tax year ending 5th April 2019 was £ 5780 and in tax year ending April 2021 to April was £6364.
<b>Incremental cost of Council Tax at cost</b>	£1168.89

<b>Incremental cost of Council Tax at 200%</b>	£2337.78
<b>Incremental cost of Council Tax at 300%</b>	£3506.67
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	With Council tax, the business would run at a loss.

<b>Business Details</b>	Family owned holiday cottage, since 1940s in Barmouth.
<b>Short Description</b>	Available to let all year since 2015 via local letting agency, Lounge Lettings. Overlooks the sea, and sleeps 6.
<b>Impact on the business of 182 threshold</b>	The introduction of this significant tax burden would result in a significant financial loss, even at prevailing rates. At 'occupied property' rates without any loading, it would result in a break even position. However, this is also coming at a time of significantly increased utility costs. The only solution would be for the rents to be significantly increased, which is likely to have a major impact on attracting guests, and would consequently be entirely counter-productive. Given the letting profile since we started letting commercially, it is our opinion that 182 days is not achievable in this market, so the proposal is designed to catch everyone, irrespective of their intent of maximising bookings. Further, the hostile attitude from some of the local politicians is hardly welcoming for holidaymakers, evidenced by this proposal, so they may well be discouraged from visiting, resulting in a loss of income and employment for the area. Barmouth Council appears to be very much against the proposal.
<b>Personal impact</b>	The impact of this extreme proposal is that we will have to consider very carefully our future plans for the Cottage, which is already occupied for a great deal of the year and enjoyed by the guests. Whilst we have not fully considered all of the cost implications, such a heavy measure will make us reassess the advantages of continuing to offer the Cottage to holiday guests, as the significant annual wear and tear of a series of holiday lets is expensive and takes considerable time, and we can reduce these and our other costs significantly by withdrawing it from the market. This seems to be counter-productive in terms of the Welsh economy.
<b>Turnover</b>	Information for the tax years ending March in each year, and in brackets, the surplus after costs. 2019, t/o £13,441 (£1,665); 2020, t/o £11,958 (£1,691); 2021, t/o £5,128 (-£2,427) ** 2021 excludes the grant. t/o figures not yet available from the agent for y/e 2022, but letting levels higher.
<b>Incremental cost of Council Tax at cost</b>	£3,370 pa
<b>Incremental cost of Council Tax at 200%</b>	£5,055 pa

<b>Incremental cost of Council Tax at 300%</b>	£6,740 pa
<b>Planning Permission restrictions</b>	No planning restrictions on letting availability.
<b>Any Other Comments</b>	

<b>Business Details</b>	3 apartments in converted Guest House in Barmouth.
<b>Short Description</b>	Two 2-bed apartments, one 1-bed apartment. Shared communal outdoor space, shared entrance with owners. Owners live in 4th apartment on site.
<b>Impact on the business of 182 threshold</b>	We will probably meet the threshold, especially as we can average across the three apartments. However, winter trade is weather dependant so in a bad year 182 days could be hard to meet. We have been lucky and picked up Monday-Friday bookings from trades people some years, and one year we had student doctors using one apartment whilst they were on placement. However, our business plan would be based on luck rather than planning as if we missed the target and moved to Council Tax our business would not be viable. 300% premium would reduce our operating profit to about 40% of its current level. Since other accommodation providers (e.g. B&Bs) do not have to declare how many days they are let this discriminates against self-catering accommodation, despite the fact that this is a growing sector in the industry as serviced accommodation is declining.
<b>Personal impact</b>	Already the political and media coverage conflating second homes with self-catering lets has increased stress levels and damaged mental health. From having had a business we could be proud of, providing a quality experience to show case the best of Wales we now feel harassed and stigmatised. Going forward, it is essential that legitimate businesses that support the tourism economy in Wales are recognised. It is clear the sector is not understood or supported by politicians, and I would fear that future changes in laws and legislation would further attack the sector. This is our main income and we are dependant on it to live. Our properties could only be sold as self-catering apartments (due to planning constraints) so there is no option to sell up. If we can't make a business from it, then nor can anyone else. We would stand to lose all the capital we have invested in the business (over £350,000).
<b>Turnover</b>	Turnover was in 2019 and 2021. £67,000: £62,000
<b>Incremental cost of Council Tax at cost</b>	£8,412.00
<b>Incremental cost of Council Tax at 200%</b>	£12,618.00
<b>Incremental cost of Council Tax at 300%</b>	£16,824.00

<b>Planning Permission restrictions</b>	Planning permission for only our apartment to be residential. The other 3 apartments in the building are for holiday use only.
<b>Any Other Comments</b>	

<b>Business Details</b>	3 bed bungalow, in the seaside village of Abersoch Gwynedd
<b>Short Description</b>	<p>within 150 metres of the local food store, 500 metres from the local PH, shops, eateries, beach, fishing, golf, sailing, riding, walking etc.</p> <p>Within easy reach of the of what the Lleyrn Peninsular and Snowdonia etc has to offer, the property has successfully been rented out since purchase in 2001</p>
<b>Impact on the business of 182 threshold</b>	<p>Immediately prior to the Pandemic in March 202, I made my best letting year, 2019/2020, when I made 20 weeks lettings! 140 days</p> <p>Having a successful holiday let, with repeat bookings, realistically this is not achievable, particularly with the vagaries of the UK ( Welsh) weather and the set school holidays. Already parents cannot take their children out of school in term time.....</p> <p>Achieving bookings for 182 days (6 months) of the year will put a lot of pressure on me as an owner (the letting agents are already aggressively marketing the property) to achieve a higher occupancy rate. Taking private bookings can infringe on the rental agreement with the letting agent, so is restricted.</p> <p>Most of the lettings occur during the school holidays which spread over the year are ( 3 months). The most popular time being July / August, ironically followed by Christmas &amp; NYE,.</p> <p>Then somewhere we need to find another 91days of bookings (3 months) spread over 6 months.....!</p> <p>What market are we pitching at ? Predominately elderly? Short breaks? We cannot take business / work persons to the area, or longer term lets as our Insurance cover is holiday lettings only.</p> <p>People's attitude to life and holidays has changed, there is still a degree of uncertainty about booking too far in advance, just in case, taking short break weekend bookings is not the answer.</p> <p>The Welsh government having a totally different approach to the way matters are handled and them not seemingly to understand the hospitality business, how we contribute to the economy etc is not helpful. Why pitch at 182 days....this is a requirement for Residency per HMRC!!!!</p>

<b>Personal impact</b>	<p><b>WORRY / STRESS</b></p> <p>The immediate impact in owning /letting the property in N Wales is that it becomes worryingly stressful.</p> <p>This is due in part to the uncertainty surrounding the proposals made by the Welsh Government &amp; Plaid Cymru the predominate party in Gwynedd, is there a retrospective clawback should I not qualify one year to achieve a letting level of 182 days? The deemed cost would be nearly £7000! A penalty???? Where would that amount come from? Who will refund the charges that I pay for waste disposal as this would be inclusive of reverting to Council Tax!</p> <p>There needs to be more clarity about the definition of 2nd homes &amp; holiday lets. We have seen a large increase since the pandemic, in the number of properties now letting in the village that up until now have been 2nd homes!</p> <p>Is it feasible to continue letting or do we bite the bullet and withdraw from the letting market and / or sell the property and purchase out of Wales? Yes we do have an association back to 1920's with Abersoch.</p> <p>The property was purchased as an joint investment in May 2001 as an alternative to other forms of investment....the ideal portfolio being approx. 1/3 in cash 1/3 in Stocks &amp; shares &amp; 1/3 property the former we already held!</p> <p>The intention was/is to provide an alternative form of income on the capital invested just as we would from other forms of investment.</p> <p>Now as retired persons, having to achieve 182 days lettings, will cause us to run at a loss by the time advertising, cleaning, gardener, heating/ light and water has been paid.</p> <p>What is even more concerning / worrying is the impact that not achieving a letting period of 182 days will have if it is decided that business rates do not apply, reverting the property retrospectively to council tax that is 300% of the normal rating.....</p> <p>Disappointingly our current bookings are down on previous years, still having Easter &amp; June holiday available....</p>
<b>Turnover</b>	<p>Gross turnover 2018/2019 £11356.00</p> <p>Gross turnover 2019/2020 £14286.00</p> <p>Gross turnover 2020/2021 £8870.00</p>
<b>Incremental cost of Council Tax at cost</b>	<p>£2247</p>

<b>Incremental cost of Council Tax at 200%</b>	£4494
<b>Incremental cost of Council Tax at 300%</b>	£6741
<b>Planning Permission restrictions</b>	Not that we are aware of!
<b>Any Other Comments</b>	

<b>Business Details</b>	Holiday Let in Pembrokeshire.
<b>Short Description</b>	This is a single holiday cottage. It is a fairly isolated cottage which used to be our sole residence, but we moved into Aberystwyth 39 years ago. After some unsatisfactory longer-let tenants, we refurbished it and since July 2015 have been letting it for weekly stays. It is available for letting all year and we do not use the cottage ourselves.
<b>Impact on the business of 182 threshold</b>	The cottage is let for about 90 days a year; the most in one year has been 110. We do not see significant demand beyond the summer, Easter and Christmas periods. Reaching 182 days of letting is frankly impossible. As well as capital costs (we have spent around £55,000 in the last 8 years) our income less running costs (management, cleaning, gardening, maintenance etc.) averages around £3100pa. If we have to pay council tax the drain on our finances will be unacceptable. Closing the business will impact the people who manage and maintain the cottage and numerous visitors to the area will be lost; the impact on the local economy is clear.
<b>Personal impact</b>	We and our children (who were brought up here but all live in other countries) are emotionally attached. Our two sons are particularly keen that we do not sell the cottage, although the financial cost to us is already draining. One son (who works for the Foreign Office) has expressed the wish to live there when he retires. If we have to sell the cottage it will cause serious family heartache.
<b>Turnover</b>	Our turnover in 2019 was £9,544; in 2021 it was £11,968.
<b>Incremental cost of Council Tax at cost</b>	£2,089.
<b>Incremental cost of Council Tax at 200%</b>	£4,178.
<b>Incremental cost of Council Tax at 300%</b>	£6,267
<b>Planning Permission restrictions</b>	We are not aware of any constraints like this.
<b>Any Other Comments</b>	

<b>Business Details</b>	One Converted barn into a single three bedroom holiday cottage on our farm yard in Pembrokeshire.
<b>Short Description</b>	Started trading July 2018
<b>Impact on the business of 182 threshold</b>	Since we have been trading we have managed to meet the 182 day threshold and we will meet it again this year



	<p>based on the bookings that we have so far for 2022. We manage this by providing a very well-equipped cottage with a personal service and gaining very good reviews. One of the other main factors is that we offer the cottage all the year round at reasonable prices. By having Business rate relief allows us to keep our prices down. If we were to have to pay Business Rates at 100%/200%/300% it would have a big impact on our prices. Our target is to have the cottage occupied more than 26 weeks of the year. We do not just target the peak seasons. People staying in the cottage spend money in local businesses and in Pembrokeshire and Ceredigion. THE MAIN REASON FOR US NOT HITTING 26 WEEKS WOULD BE IF THE COST OF LIVING WERE TO GO SO HIGH THAT PEOPLE HAD TO CUT BACK ON THEIR HOLIDAYS, AS THEY COULD NOT AFFORD THEM. THIS WOULD BE OUT OF OUR CONTROL.</p>
<b>Personal impact</b>	<p>The cottage provides a supplementary income to the farm. The combination of the farm and the cottage work well together with one of us working as a Carer. I also do some contracting. By not having the income from the cottage would make a significant impact on our financial situation. The combination of all our incomes does not provide us with a massive disposable income after taking out all the overheads. Adding another £2000- £6000 for council taxes would make our costs go up. In turn this would make our cottage more expensive to rent. This could then reduce the number of weeks that it is rented for.</p> <p>Less people coming to Pembrokeshire on holiday means less money being spent with Pembrokeshire and Ceredigion businesses.</p>
<b>Turnover</b>	<p>Turnover 2019/2020 £17457 Turnover 2020/2021 £15192</p>
<b>Incremental cost of Council Tax at cost</b>	£1900
<b>Incremental cost of Council Tax at 200%</b>	£3800
<b>Incremental cost of Council Tax at 300%</b>	£5700
<b>Planning Permission restrictions</b>	When we applied for planning to do the conversion, it was on the condition that it was for short term holiday let and not for a long term let or for a permanent residence.
<b>Any Other Comments</b>	

<b>Business Details</b>	My wife and I run a single holiday cottage near the town of Narberth in Lampeter Velfrey.
<b>Short Description</b>	It is a 3 bedroom cottage with enclosed garden and it is very popular with dog owners and families. It is in a quiet, peaceful location just over 2 miles from Narberth and we have been trading for 8 years.

<b>Impact on the business of 182 threshold</b>	With the holiday season and demand for a rural cottage limited to the spring and summer months in West Wales, a good year for us has been to let it for around 140-150 days even though it is available for almost 11 months of the year allowing for maintenance in January/early February. We employ individuals and businesses locally to complete cleaning, garden maintenance, plus heating safety checks, contributing to the local economy. With the suggested threshold of 182 let days, it is likely that we would fall below this and would be paying council tax. This would remove any small profit that is made from our business particularly if we had to pay 300% of the current council tax rates that is part of the proposal. If we were to continue trading, this additional cost would need to be passed on to holiday makers and guests. The scale of price increases would be around 20-25% which could mean we are struggling to compete with other parts of the UK that do not have this policy, and even holidays abroad.
<b>Personal impact</b>	Unfortunately this issue has been causing some financial stress. Although we only have a single holiday, it still needs to be run as a business. The potential for the additional council tax costs that could come into being would make the business unviable, removing the local employment it provides and reducing the holiday property stock bringing tourists into Pembrokeshire. We find it difficult to understand why holiday businesses are being targeted in a similar way to second homes and believe that genuine holiday business will be collateral damage through this policy. The result would be the business running at a loss, and if this was the case, we would need to consider stopping trading and selling up.
<b>Turnover</b>	Gross turnover for the 2019/20 tax year was - £10,900. Gross turnover for tax 2021/22 was £16,000
<b>Incremental cost of Council Tax at cost</b>	£2220
<b>Incremental cost of Council Tax at 200%</b>	£6660
<b>Incremental cost of Council Tax at 300%</b>	£8880
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	2 bedroom, converted barn in Bosherton, Pembrokeshire.
<b>Short Description</b>	traded for many years. We bought it 2.5 years ago.
<b>Impact on the business of 182 threshold</b>	Even in our busiest years when foreign travel was not allowed so UK based holidays thrived, we reached 180 nights booked. We rely on weekend short break bookings outside of peak season. We would not be able to reach the 182 levels proposed in a normal year. We would

	therefore be forced to sell as the new rates would make the FHL non financially viable.
<b>Personal impact</b>	Income from the Cottage represents around half of my total annual income
<b>Turnover</b>	£19896 in 2021, we only bought at the end of 2019 so no figures for 2019.
<b>Incremental cost of Council Tax at cost</b>	£2247 per annum
<b>Incremental cost of Council Tax at 200%</b>	£6741 per annum
<b>Incremental cost of Council Tax at 300%</b>	£8988 per annum
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	6 bedroom, 6 bathroom holiday let traded for many years but in a state of disrepair when we bought it 3 years ago in Ceredigion
<b>Short Description</b>	Now a thriving FHL business as we have invested huge amounts to improve it for guests.
<b>Impact on the business of 182 threshold</b>	Due to its size and location of our property 90% of our bookings are made by multi families, which makes bookings outside of School holidays very difficult and largely means we rely on weekend short break bookings outside of peak season. We would not be able to reach the 182 levels proposed. We would therefore be forced to sell as the new rates would make the FHL non financially viable.
<b>Personal impact</b>	Income from our property represents more than half of my total annual income
<b>Turnover</b>	£35064 in 2021, £16850 in 2019 (but I only owned for half of 2019, as I bought it mid-year)
<b>Incremental cost of Council Tax at cost</b>	£3531 per annum
<b>Incremental cost of Council Tax at 200%</b>	£10593 per annum
<b>Incremental cost of Council Tax at 300%</b>	£14124 per annum
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Small self-catering cottage in Gwynedd
<b>Short Description</b>	Coastal location, sleeps up to 4 people. Started September 2021
<b>Impact on the business of 182 threshold</b>	I haven't yet qualified for business rates under the existing rules but should be eligible in the coming months. If the 182 threshold is applied then I can't see that I will be able to fulfill the occupancy rate requirements. This will force me to stay on council tax with premiums set by Gwynedd council. This would make

	my business unviable and as such I am currently trying to sell the property.
<b>Personal impact</b>	I live locally and this was meant to be my source of income. If I sell I will have to try to find another source of income. This is very distressing and has had a significant detrimental effect on my mental health. I put everything into the renovation of the cottage and it is sad to be forced into this position.
<b>Turnover</b>	Turnover from September to December 2021 was approximately £6000
<b>Incremental cost of Council Tax at cost</b>	£3302
<b>Incremental cost of Council Tax at 200%</b>	£4953
<b>Incremental cost of Council Tax at 300%</b>	£6604
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	New to market, recently refurbished 2 bed terraced cottage in Blaenau Ffestiniog, LL41 3AD
<b>Short Description</b>	Started trading this year.
<b>Impact on the business of 182 threshold</b>	That we will have to pay council tax, the rate at 100% as in Gwynedd means at 22 weeks we may break even, if rates remain the same and income is as predicted. If Gwynedd increases to 300% we will be forced to not run the business.
<b>Personal impact</b>	We will loose a lot of money, estimated £70-80k We love Wales and our house and are proud of owning a piece of our Welsh heritage. However if we lost that we wouldnt return to Wales in our retirement (which is the current plan)
<b>Turnover</b>	In 2021 Income generated circa £300, income spent circa £6-10k set up fees.
<b>Incremental cost of Council Tax at cost</b>	£2630.08
<b>Incremental cost of Council Tax at 200%</b>	£3,945. 24
<b>Incremental cost of Council Tax at 300%</b>	£5,260.32
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	Current bookings this year to date: 7 bookings 39 days booked Total Income expected to date based on bookings (pre fees, expenses etc) £3188 or £2422.88 after the agent fees to pay local cleaners and supplies, utilities, council tax, small Welsh mortgage, etc

<b>Business Details</b>	We have a holiday cottage on the coastal area of Ceredigion and is very rural area.
<b>Short Description</b>	Once November comes the village of New Quay closed till Easter time. We have been trading for 4years.
<b>Impact on the business of 182 threshold</b>	The impact on our business if the threshold of 182 was implemented would have a huge impact on the business. Business is run on an annual basis i.e. people can book all year round. In the last 2years due to due COVID and lockdown people couldn't go abroad so people booked with stay vacations and this has now been taken away by government policy - opening up. Even in this 2year period last year we did not get close to 182 days.
<b>Personal impact</b>	The impact that will have on us is that we might have to sell the property even though it's been in the family for over 100years and also it will affect my pension top up. Four years ago we spend £30k on the property to get it up to a high standard in order to let it. It has been recognised for a 4* quality grading since we've opened on a yearly basis.
<b>Turnover</b>	£11,500 2019 £16,000 2021
<b>Incremental cost of Council Tax at cost</b>	£1200
<b>Incremental cost of Council Tax at 200%</b>	£4,000
<b>Incremental cost of Council Tax at 300%</b>	£6,000
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	A two bedrooomed Rural holiday cottage, which we have renovated and have let for the past 8 years.
<b>Short Description</b>	It is available all year, other than when essential maintenance is required. Principally our bookings are between April and mid-September, with occasional winter bookings, totalling 116 days in 2019
<b>Impact on the business of 182 threshold</b>	The 182 threshold would be devastating and not be a viable business option, due to the lack of visitors to Wales during the wet and windy winter months, despite proactive marketing through West Wales Holiday Cottages and our own marketing and brilliant reviews. We would no longer be able to maintain a property in Wales. We prided ourselves in always supporting local professions and trades to renovate this uninhabitable property which had been on the market for several years. We continue to use local trades and services to maintain the property and our business.
<b>Personal impact</b>	Financially- we would not be able to continue with this letting business in Wales, diminishing our income. We would have to sell the property. Emotionally- We and our family would be devastated to lose this contact with Wales where we have holidayed for

	<p>many generations, originally in caravans and latterly, we have been able to invest in the cottage to fund our's and our family's holidays.</p> <p>We look on this part of Wales as our little bit of heaven, visiting whenever we can between clients and in the winter.</p> <p>We would lose local friends and the opportunity of continuing to make Welsh memories of fabulous times there, for us, our children and our grandchildren.</p> <p>Losing the cottage would diminish our daily life in retirement, as we enjoy interacting with our clients and local services.</p> <p>We would lose friends and local contact. We would be devastated that our hard work in renovating this property, which no one else seemed to want, will be snatched away from us by a Welsh Assembly Government diktat.</p>
<b>Turnover</b>	<p>Turnover 2019 9,348.00</p> <p>Turnover 2021 12,646.00</p>
<b>Incremental cost of Council Tax at cost</b>	<p>Rateable Value 2,800.00</p> <p>Charge for the period 1,498.00</p>
<b>Incremental cost of Council Tax at 200%</b>	2,996.00
<b>Incremental cost of Council Tax at 300%</b>	4,494.00
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	one holiday cottage in Gwynedd.
<b>Short Description</b>	<p>We own one holiday cottage in a seaside location, one I have visited regularly from the age of 7, I am 52 now. The property is a very old stone bungalow that had been inherited by a family out of the area many years ago, solely used by them as a holiday home but in later years not really used at all. When we purchased it in 2016 it had been empty and on the market for years and due to the amount of repair work needed, local house hunters had not been interested.</p> <p>We have since spent around £60,000 with local companies and trades people to renovate the house, our long term intention to retire and move there. We will never recoup the money spent, but that wasn't the aim at the time, we thought we were investing in our future. We employ three local people to manage the let as we live too far away.</p>
<b>Impact on the business of 182 threshold</b>	We started to let the house as a holiday home in 2017 to try and supplement the outgoings until we can move

	there. We have never made a profit or indeed broke even but it helps. If the threshold is raised to 182 days I fear we will not hit that target due to lack of demand. The increase in council tax, coupled with rises in energy bills and other expenses will mean we will need to try and sell the house.
<b>Personal impact</b>	Selling the house will be heartbreaking. We are a normal working class family. My husband worked in warehousing, I work in a Bank. We live in a built up area and have always craved to be near the sea and fresh air. We used my redundancy money from the previous company for the deposit, my husband's pension was taken as a lump sum to pay for the repairs and refurbishment - every penny we have is in that house, we have no other savings and very little pension. If we sell - we will not get back what we paid plus the other money - we thought we were building our future.
<b>Turnover</b>	2019 £12,628 and 2021 £12,623
<b>Incremental cost of Council Tax at cost</b>	£1000 - we could afford this
<b>Incremental cost of Council Tax at 200%</b>	£3000 - we could not afford this
<b>Incremental cost of Council Tax at 300%</b>	£4000 - we could not afford this
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	I have one holiday cottage, sleeps 5, popular rural/coastal location in Dwyfor, Gwynedd.
<b>Short Description</b>	I live less than a mile from my cottage, do not use my property for personal use and have been trading since 2014
<b>Impact on the business of 182 threshold</b>	<p>My cottage is available all year but having to constantly worry whether I will comply with the 182 days to remain viable, will make planning ahead, budgeting and investing in my business impossible:</p> <p>I will not be able to employ so many local people to maintain the standards that I currently do. For example, I do not know if I would be able to continue to pay for a cleaner, arrange for repairs, the replacement of items, and improvements if there is a chance that I may incur a huge council tax bill at the end of the year.</p> <p>Inevitably the high standards of decoration, repair and facilities that I offer at my property are likely to have to be reduced.</p> <p>Plans for 'Green' improvements such as electric vehicle charging point, improved insulation and replacement boiler will be put on hold</p> <p>I could be forced to reduce prices (at a time when they actually need to be increasing due to inflationary pressure) in order to attract bookings, which would again</p>

	<p>affect the profitability of my business, especially out of season when heating costs are very high.</p> <p>Competition amongst businesses all concentrating on trying to achieve the 182 days will drive standards down throughout the industry.</p>
<b>Personal impact</b>	<p>The impact of these proposals has caused me enormous stress (to the extent of making me ill) and is extremely demoralising. I have invested heavily in my property and have worked very hard to build up and sustain a successful micro-business to a high standard for 8 years, conform to all legal requirements, and having navigated through the pandemic I feel totally unsupported by government. I just cannot understand why small tourism businesses often run by local people and that bring many benefits and jobs to the area, are being targeted so ruthlessly. I am not a wealthy second home owner. I have relatively low earnings and rely on my self-catering business for over half of my income- and will do until I receive my state pension. I am a woman in my 60s awaiting my state pension and feel my whole financial security and future is threatened.</p> <p>I normally do just meet the 182 day criteria, but with all the current uncertainty of inflation, pandemic, war etc, I would never be able to be confident that I would always achieve that number of nights booked. Trying to continue to trade under that degree of pressure would not be sensible. One option would be to sell my property, but as I plan to retire here when I can, this is not really an option. (I currently live with a partner but have no rights to remain in his property). The property is not suitable for a long term let as it is an old cottage and would not meet the required EPC levels. My only other option is to move back in now on an extremely reduced income. So, if I have to close my business, I will be forced to rely on what remains of savings to survive until I receive my pension and then face a much-reduced standard of living in retirement. Having worked all of my life and planned very carefully, this is a dreadful position to be put in and feels extremely unfair.</p>
<b>Turnover</b>	<p>My turnover for 2019 was only around £13,000- lower than usual as I had to close for a bit due to an insurance claim and also this figure was net of 22% commission as I was letting then via Sykes Cottages. My turnover for 2021 will be in the region of £22,500 as I now take bookings myself.</p>
<b>Incremental cost of Council Tax at cost</b>	£2228.75
<b>Incremental cost of Council Tax at 200%</b>	£4457.50
<b>Incremental cost of Council Tax at 300%</b>	£6668.25



<b>Planning Permission restrictions</b>	My property has planning for full residential use with no restrictions.
<b>Any Other Comments</b>	

<b>Business Details</b>	We have one 2 bedroom holiday flat in the coastal village of Solva in West Wales.
<b>Short Description</b>	We have been renting the flat out as a self-catering establishment since February 2017 via Sykes as our booking agent.
<b>Impact on the business of 182 threshold</b>	<p>Booking pattern:</p> <p>2017 = 22 weeks  2018 = 24 weeks  2019 = 21 weeks  2020 = 12 weeks (Covid closures)  2021 = 20 weeks</p> <p>As evidenced by the pattern of our bookings, it has not been possible to achieve 26 weeks of bookings in Solva, which is an area people tend to visit in the high season to walk the coastal path and take part in water based activities.</p>
<b>Personal impact</b>	
<b>Turnover</b>	Our 2019 turnover was £11,073. 2021 = £9,570.
<b>Incremental cost of Council Tax at cost</b>	The rateable value of the property is set at £3600. If we did not receive Small Business Relief we would be liable to pay £1926 in Council Tax
<b>Incremental cost of Council Tax at 200%</b>	£3852.00
<b>Incremental cost of Council Tax at 300%</b>	£5886.00
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	Bearing in mind the costs of running the flat (Electricity, water rates, maintenance charges, cleaning etc) we would struggle to break even.

<b>Business Details</b>	3 bedroom (sleeps 8) single holiday cottage near beach in Gwynedd.
<b>Short Description</b>	Been trading as holiday let for 6 years. Let via VRBO and some direct bookings.
<b>Impact on the business of 182 threshold</b>	It is virtually impossible to achieve 182 days as the area is so seasonal. All our attractions locally are weather dependent and we hardly get any bookings Nov - March. We have a lot of short breaks and it is not practical or cost effective to have multiple changeovers each week. We often find there are void periods which are unbookable so even if we tried to be 100% booked in the 6 months of the "better" weather this is not achievable. We take a lot of family bookings due to the size and style of house which are restricted to the school holidays

	<p>(around 10 weeks in potentially clement weather). We also allow 2 dogs to stay as part of the self catering booking which provides a valuable service to people who could not otherwise visit the area.</p> <p>If we discount heavily or are not selective in choosing guests (as we are currently eg not allowing parties or groups under the age of 25) we risk damage and potential noise and disruption in the local area with guests not respecting the peaceful beauty of the town. To date we have had guests who respect and enjoy the area, using local restaurants and pubs and are thoughtfully recycling and disposing of rubbish. This could be put at risk with holiday lets going to any lengths to achieve the 182 days.</p>
<p><b>Personal impact</b></p>	<p>We feel completely trapped in that we bought our holiday let 7 years ago and spent a lot of time and money bringing the property up to a really good standard (it had been for sale for 9 months and was in need of modernisation). We obtained a special mortgage, insurance and gas/electric certificates in order to trade safely. Not to mention the stress and effort to maintain the property during the 20/21 Covid period and re-open safely. Financially it is hard to know what to do as it feels changes have been rushed through (we know people who had no time to prepare for Gwynedd's 100% Council tax premium). We don't feel we have had time to prepare or plan for these latest even more dramatic changes.</p> <p>Compare the proposed changes to the 2016 Buy to Let interest tax relief changes which were signposted well in advance and phased in over 4 tax years and allowed people to seek advice and make the big decisions about property over time. After all, closing a business and selling a property is not an overnight process!</p> <p>Gwynedd has the most extreme views of all Welsh councils and we would want their actions moderated at the very least so that they could not implement the most extreme measures overnight.</p> <p>If we sell up our cleaner, gardener and handy man will all see a drop in income and if others follow suit - will there be other employment opportunities in this quiet, remote seaside town?</p> <p>We are learning Welsh and have made friends in the town and always use local trades, shops and restaurants (and encourage our guests to). It feels like we are being blamed and vilified in the press for a problem we have not created. Wales does not feel like a welcoming place anymore and I fear many tourists are getting that message.</p>
<p><b>Turnover</b></p>	<p>2019 - £11,000 2021 - £16,500</p>

<b>Incremental cost of Council Tax at cost</b>	£2300 pa
<b>Incremental cost of Council Tax at 200%</b>	£6,900
<b>Incremental cost of Council Tax at 300%</b>	£9,200
<b>Planning Permission restrictions</b>	Planning permission is for residential
<b>Any Other Comments</b>	

<b>Business Details</b>	<p>Single storey three-bedroomed self catering holiday cottage in a rural location, four miles from the beaches at Aberporth and Tresaith, Ceredigion.</p> <p>Holiday let, in partnership with three others</p>
<b>Short Description</b>	<p>Purchased in 2002, began trading as a registered 3-star holiday let via West Wales Holiday Cottages since 2004 once initial improvements made.</p>
<b>Impact on the business of 182 threshold</b>	<p>The business will struggle to survive if a minimum 182-day limit is imposed by Welsh Govt. Although available to let for 9 months of the year, the business has, at most, only been commercially let for 12 weeks (84 days) in any of the 18 years since 2004. Business rates have never been formally applied for, although an inquiry was made to Ceredigion Council in 2019. Council tax, although representing approximately 50% of annual letting turnover, is considered reasonable at present levels for the use we make of some of the remaining weeks. Significantly, every penny of the income from letting the cottage, in addition to our own capital injections have been spent on the maintenance of what is a 200+ year old property. Just over £100,000 has been spent on the upkeep and running of the cottage since 2003 and, of that, approximately 90% has been spent with local traders and suppliers in Ceredigion and Pembrokeshire. It is worth noting that 95% of our income comes from holidaymakers based in England, each of whom are spending their money in the area while on holiday. Many of them return year after year.</p>
<b>Personal impact</b>	<p>If Council Tax is doubled by Ceredigion Council it will, by itself, wipe out our income from lettings (at present levels). If trebled, we would need to find a further £2,000, just to cover the Council Tax. If we apply to register for Business Rates, the maximum we could realistically let the property for would be 3 months (13 weeks) a year, based on the last 18 years' data. Failure to meet that target would, presumably, result in the reimposing of penal Council Tax.</p> <p>So our feelings are that we are demoralised, sad and considerably less inclined to persevere with our 'labour of love' in the beautiful West Wales countryside.</p> <p>The likely outcome will be a property for sale, in all likelihood, which may be the desired result for the WG,</p>

	but one requiring considerable money and effort to maintain the property.
<b>Turnover</b>	2019 £4,712. 2021 £4,375
<b>Incremental cost of Council Tax at cost</b>	£2,156
<b>Incremental cost of Council Tax at 200%</b>	£4,312
<b>Incremental cost of Council Tax at 300%</b>	£6,468
<b>Planning Permission restrictions</b>	We are unaware of any planning limits on the amount or length of any lettings at the property.
<b>Any Other Comments</b>	I live in Wales (Cardiff North) and believe the Welsh Govt should make a better and clearer distinction between second home ownership and holiday-let properties such as ours, which generate added real income for the West Wales economy.

<b>Business Details</b>	5 self catering holiday cottages ( Family Holiday Cottages) in Powys
<b>Short Description</b>	rural location, trading for 17 years.
<b>Impact on the business of 182 threshold</b>	With the expenses of running, and maintaining five cottages, we only started to turn a profit and pay tax's in the last 4 years. This started around the time we changed from Council Tax to Business Rates. It was very difficult until then and we found after expenses were paid we were below the level where we were expected to pay tax's. Things also started to strengthen with more customers looking for holidays at quality locations closer to home with the cost of holidays abroad becoming more expensive. But due to difficulty letting in any great numbers over the years, we have had to keep our prices stable with no increases until recently to cover rising costs for labor, utilities and supplies. ( these are now on the rise again) The impact on our business reverting back to Council Tax would be catastrophic after all the progress we have made over the past 4 years and would mean we would not be in the income bracket to pay tax's.
<b>Personal impact</b>	For us, the last 4 years has been a great relief to finally make the business profitable after so many years of hard work and commitment (opened 2005) and it would be devastating to lose the progress we have made. Financially, the hardship would return again, not having that little extra to spend on those items you need, would not only effect us.
<b>Turnover</b>	2019: gross 54k expenses 31k; 2020: gross, 55k expenses, 39k.
<b>Incremental cost of Council Tax at cost</b>	4000 pounds
<b>Incremental cost of Council Tax at 200%</b>	8000 pounds
<b>Incremental cost of Council Tax at 300%</b>	12000 pounds

<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	a holiday cottage in Pembrokeshire.
<b>Short Description</b>	a one bedroom cottage located in the village of St Dogmael's which we have been letting out for the past sixteen years.
<b>Impact on the business of 182 threshold</b>	If the new 182 day threshold is introduced we may have to consider selling the property as if we are unable to achieve those numbers the impact of having to pay up to 300% council tax on top of our increased costs due to energy price rises, etc would effectively see us running at break even or worse.
<b>Personal impact</b>	would effectively reduce our profits to approx £1000 - £1500 which would not make continuing to run the business worthwhile.
<b>Turnover</b>	In both 2019 and 2021 we took approx. £10000 in bookings. After paying the mortgage, commission to our booking agents, paying for cleaning and maintenance and energy bills our profits would be approx. £4000
<b>Incremental cost of Council Tax at cost</b>	would be approx £950
<b>Incremental cost of Council Tax at 200%</b>	That would potentially add £1900
<b>Incremental cost of Council Tax at 300%</b>	That would potentially add £2850
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	A single holiday cottage. Located on the Cleddau Estuary in Pembrokeshire
<b>Short Description</b>	rented out through an agency for the last 10 years.
<b>Impact on the business of 182 threshold</b>	The 182 days rented would be impossible to achieve. The season in West Wales is only for the summer months.
<b>Personal impact</b>	If the 182 day rule is implemented, we would try to sell the cottage.
<b>Turnover</b>	Gross income in 2019 was £7942 and in 2021 was £10973.
<b>Incremental cost of Council Tax at cost</b>	£1000
<b>Incremental cost of Council Tax at 200%</b>	£3000
<b>Incremental cost of Council Tax at 300%</b>	£4000
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	2 x 1 bedroom self contained flats on the Wales Coastal Path in Barry Island.
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<b>Short Description</b>	Trading as holiday lets since 2016, advertised through Sykes, Airbnb and a direct booking website.
<b>Impact on the business of 182 threshold</b>	<p>No more profitable short breaks or flexible bookings as I will need to insist on back to back 7 or 14 day lets, eliminating the many guests who come for a few nights to walk the southern section of the Coastal path</p> <p>Significant discounting to achieve 7 day bookings during the off season, appealing to less affluent guests who are likely to spend less locally. Lower rental income will threaten the viability of the business.</p> <p>No more 4 – 8 week off season bookings, usually to people living in local holiday parks that only have a 10 month licence, or guests relocating to Barry and waiting for completion dates for property transactions. This winter closure will threaten the viability of the business.</p> <p>If I can't achieve the threshold then closure of the business will be necessary, so I will no longer employ my housekeeper, handyman, oven cleaner, local electrician and gas engineer.</p>
<b>Personal impact</b>	<p>Having worked very hard to restart my business after the COVID closures it is so hard to face yet another blow to its viability. I have had so much help from Visit Wales and the tourism team at the Vale of Glamorgan Council, only to have the viability of the business threatened by Welsh Government legislation.</p> <p>To give an example showing how the targets are difficult to achieve, I have a guest checking in on Easter Sunday for 7 nights. She is a vicar, she is delivering her Easter Sunday services then arriving at my property. She has booked through Sykes, so has paid for two weeks as my property is a Friday – Friday let. I cannot book the weekend before or the five nights after her departure because my housekeeper only works for me on a Friday. I have 14 days revenue, 14 days blocked from other bookings, but only 7 booked nights counting towards my target of 182.</p>
<b>Turnover</b>	<p>2019/20 tax year £17721 including agency commission</p> <p>2021/22 tax year £23978 including agency commission</p>
<b>Incremental cost of Council Tax at cost</b>	£1562 per property, so £3124
<b>Incremental cost of Council Tax at 200%</b>	£6248
<b>Incremental cost of Council Tax at 300%</b>	£9372
<b>Planning Permission restrictions</b>	No, but the local estate agent says that 1 bedroom flats are almost impossible to sell on Barry Island.
<b>Any Other Comments</b>	I have no complaints about the COVID grants and am grateful for them, but it is worth noting that for the purposes of the COVID grant my properties, bought at separate times with separate land registry entries, were

	one hereditament for the purposes of the grant. Should they revert to Council Tax they will be taxed as two separate dwellings.
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<b>Business Details</b>	5 star, 2 Bedroom, 1 Bathroom Detached Cottage on the same title deed as our main residence directly adjacent to our main property. Rural location in Flintshire
<b>Short Description</b>	Trading for the past 7.5 years and receiving customers choice award (not below 9.5/10 average for each year) via our agent Cottages. Come every year of trading.
<b>Impact on the business of 182 threshold</b>	<p>Impact- Business and Personally - Our cottage is available to let 365 days a year however it is not in a historical tourist area/ honeypot location and we would struggle to achieve the 182 threshold. In 2019 and 2021 we had two exceptionally busy years for us, with lots of repeat guests and we still only achieved 179 and 163 nights booked respectively. We do all our own laundry, gardening, maintenance and receive help when required the services of a local cleaner to keep the costs down as we cannot charge the premium rates that more desirable FHL locations can. If we did not meet the 182 threshold and had to pay the premium council tax we would lose any profit we make, meaning running a FHL would become unprofitable and not viable. We struggle to let our cottage during the winter months as our location rarely attracts winter guests.</p> <p>Our cottage is on the same title deed and plot as our house and is not a second home and paying council tax at premium rates for the cottage and on our own property would mean we would not be able to afford to live at our present location and would have to sell and move home, which is causing us great stress and anxiety. We run the holiday let to supplement our pensions and therefore rely on the income that our business generates for us. We are also registered but unpaid carers for two sets of elderly parents and care for 3 grand children twice a week so the impact of having to undertake these duties as well as trying to run a FHL to the booking let levels the WG are suggesting will have a significant impact on our health and are ability to cope.</p>
<b>Personal impact</b>	As above
<b>Turnover</b>	Turnover- 2019 = £12,805.18 2021 = £14,269.55 however, that is gross turnover, not taking into account bills, insurance, maintenance and general running costs.
<b>Incremental cost of Council Tax at cost</b>	our council tax for our cottage is £1498.00 pa. However, we qualify for SBRR so pay nothing at present. The council tax for our main home on the same plot is £3649.00 Cottage Council Tax 100% = £2996.00
<b>Incremental cost of Council Tax at 200%</b>	£4494.00
<b>Incremental cost of Council Tax at 300%</b>	£5992.00

<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	2 roundhouse cabins in Denbigh.
<b>Short Description</b>	Couples only. Short lets. Been trading for 2 years
<b>Impact on the business of 182 threshold</b>	Our business plan was created in the firm knowledge that if we achieved 70 days of bookings within a letting year, we would be business rated, rather than liable for council tax, and could subsequently apply for business rates relief. So, after a punishing two years, we are being told that if we have a bad year (actually, not even bad..we'd struggle any year to reach 182 days) we get further punished by being liable for council tax.. a full 300% would be around 10% of our turnover.
<b>Personal impact</b>	From our point of view, we began our plan to bring visitors to the Vale with the belief that we could provide first class accommodation with one of the best views in the UK, all with the precept that our visitors feel they are staying with friends. We send our guests to local restaurants and attractions. We give them memories. Feeling under pressure to 'fill those beds' takes the lift and enjoyment out of this service. In Denbighshire, Flintshire and other counties, there are true businesses out there that are unlikely to ever reach such occupancy. Many are on farms, where it is a handy second income. Others (such as ours) are a move towards a gentler pace nearer home and a helpful second pension-type income. That is now in question..It feels like a kick in the guts.
<b>Turnover</b>	2019 turnover approx. £8,000. (just setting up..and covid..). 2021 approx £45,000.
<b>Incremental cost of Council Tax at cost</b>	£1,800
<b>Incremental cost of Council Tax at 200%</b>	£3,600
<b>Incremental cost of Council Tax at 300%</b>	£5,400
<b>Planning Permission restrictions</b>	Planning restriction is Holiday accommodation only.
<b>Any Other Comments</b>	

<b>Business Details</b>	
<b>Short Description</b>	I inherited a beautiful cottage in Gwynedd from my mother. It's been commercially available through an agency as a holiday cottage for over 300 days per year for many years now, since she bought it in 2005, and before that as well. It's a beautiful house in a very remote location. As a result of this remote location, it's not really



	a year-round destination and the fierce weather on a mountainside also means we don't get many winter bookings. In the last few years the house has been let for roughly 80-100 nights per year. It is a much loved holiday destination for many of my own family and friends who visit, as well as a number of repeat bookers who come every year.
<b>Impact on the business of 182 threshold</b>	If the threshold is increased to 182 nights let, presumably council tax will therefore be imposed on us, which we cannot afford and we will be forced to sell the property. The house is not going to be particularly helpful or valuable to locals as it is so remote. I imagine it would be bought by a wealthier owner who can afford the rates and will likely keep it as a second home that is empty for even more of the year. Nothing will have changed for the local economy, except that there will be fewer tourists in the area.
<b>Personal impact</b>	It's a very sad time and I will be devastated by this development. I would implore the government to reconsider the thresholds.
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Furnished Holiday Let, one property in Tenby
<b>Short Description</b>	One property with five bedrooms, sleeping 11 plus 2 babies, 200 yards from the beach and town centre in Tenby. Bought the property in 2016, started trading in 2017 via local holiday agency (FBM Holidays, now owned by Travel Chapter)
<b>Impact on the business of 182 threshold</b>	The impact of the 182 day threshold will almost certainly end my interest in running the business. It is a large property that is always one of the last to let due to its size, and we will struggle to achieve 182 days of letting and we will be forced to significantly discount our letting rates in the off season in an attempt to boost extra nights, but in a highly competitive market for a limited number of potential guests), there is only so much that can be done, without destroying the business. We can achieve between 120 and 150 nights in an average season, and we have reached 170 nights in the latest year, where demand has been high due to international travel restrictions.

<b>Personal impact</b>	As a personal impact, we will be gutted; it will completely change our retirement plans (my wife & I are currently in our early 60s) , if we are forced to sell the property due to the 182 day threshold. My wife is from Pembrokeshire and we were planning/hoping to spend more time (and money) in West Wales using our property as a base (in the closed season) . If we sell, we will probably never return, in spite of making numerous local friends and having engaged several local businesses (agents, cleaners, electricians, plumbers, decorators etc) to help run our letting business. It feels like we are personally being targetted and driven out by the new rules, and that hurts after all the effort, time energy, risk and love (not to mention money) we have put into this business.
<b>Turnover</b>	Turnover 2019, £ 34,615 Turnover 2021 £ 34,023
<b>Incremental cost of Council Tax at cost</b>	Property was Band F £ 2,324.51, so standard charge would be 100% more for second home = £ 4,649.02
<b>Incremental cost of Council Tax at 200%</b>	£ 6,973.53
<b>Incremental cost of Council Tax at 300%</b>	£ 9,298.04
<b>Planning Permission restrictions</b>	None
<b>Any Other Comments</b>	

<b>Business Details</b>	One modern townhouse in small coastal town in Pembrokeshire
<b>Short Description</b>	trading for 15 years
<b>Impact on the business of 182 threshold</b>	<p>We will have to sell up. Even at the current 100% premium, the cost of the council tax will significantly eat into our modest profits (currently used to pay off the mortgage).</p> <p>We already open 365 days a year with average bookings 120-140. Most of our bookings come from families who are limited to the school holidays (when we are booked solid). We do get some bookings from couples between Easter and early October but as we are not a 'cottage' (with wood burner etc.) we do not get bookings out of season, unless guests are visiting family locally.</p> <p>The immediate economic impact of this will be felt by our cleaner, who has been loyal to us for 15 years. We know that our guests eat out regularly throughout their stays, plus visit paying attractions and shop locally, as do we and our family and friends when we stay out of season. These local businesses will suffer as will all the local</p>

	tradespeople we use for repairs, maintenance and upgrades.
<b>Personal impact</b>	We are both in our early sixties. We work full-time at present and have limited pensions. We funded the purchase through savings and a mortgage that we are paying off. The plan always was that the property would provide a small income in the future to supplement our pensions, in addition to contributing to the local tourist economy and enhancing our own retirement when we could stay more regularly.
<b>Turnover</b>	Turnover 2019/20: 145 days let, gross income £10,816 Turnover 2021/22: 140 days let, gross income £11,493
<b>Incremental cost of Council Tax at cost</b>	£2,220
<b>Incremental cost of Council Tax at 200%</b>	£3,330
<b>Incremental cost of Council Tax at 300%</b>	£4,440
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	One Self catering holiday cottage trading for 9 years in a seaside village location of Aberporth
<b>Short Description</b>	The property is available for let 365 days per year and has been occupied for 28 weeks per year for 3 years prior to covid-19. Last year the property was occupied for 35 weeks,
<b>Impact on the business of 182 threshold</b>	The 182 threshold would not impact on us drastically unless bookings dropped, we would have to close the business if we had to pay increased rates, the business would not be viable, our housekeeper would be made redundant and the area would lose income as the property would not be available to holiday makers.
<b>Personal impact</b>	Profit in 2019 was £7500, Profit in 2021 was £28000. (elevated due to covid-19 business grants)
<b>Turnover</b>	Council tax this year would have been £2059.75 for the year
<b>Incremental cost of Council Tax at cost</b>	if the above figure doubled this would be £4119.50
<b>Incremental cost of Council Tax at 200%</b>	If the above figure trebled this would be £6179.25
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	We are not limited by planning permission to do only short term lettings or have any restrictions.
<b>Any Other Comments</b>	

<b>Business Details</b>	One self-catering property in Porthcawl, Bridgend
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<b>Short Description</b>	a single 4 bed property that sleeps 7. Situated in the Rest Bay area of Porthcawl. We are in our first full year of trading as a FHL following 8 years as a long-term rental.
<b>Impact on the business of 182 threshold</b>	<p>we operate near to capacity during the peak months of the year from May through until September but find it difficult to attract guests during the late Autumn and Winter months. During the peak periods we find that our guests use local businesses regularly such as pubs, restaurants, and tourist attractions. Our property is available to rent for the full 365 days a year, however, it appears to be impossible to fill the 182 days required under this legislation.</p> <p>If the 182-day figure is agreed we will see a massive increase in costs directly from the Council Tax change. This will impact of the financial viability of our business. It would not be easy to pass on this additional tax to customers that are experiencing massive increases in the cost of living in general. It would also have a detrimental impact on the Welsh tourism industry as it would be seen as another sign that Wales is closed to the tourist and put us at a disadvantage to our friends in other U.K. countries.</p>
<b>Personal impact</b>	
<b>Turnover</b>	Our projection for the first full year turnover would be around £25,000. With deductions for proposed Council tax on top of energy, waste disposal, cleaning and maintenance the numbers look disappointing at best.
<b>Incremental cost of Council Tax at cost</b>	The Council Tax for our band would be in the region of £2500.
<b>Incremental cost of Council Tax at 200%</b>	£5000
<b>Incremental cost of Council Tax at 300%</b>	£7500
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>200% or 300% multipliers would see an end to FHL in the same way that government legislation in the long-term rental market has destroyed that sector.</p> <p>We run our property as a full-time business and believe the 182-day figure does not represent an improvement on existing legislation. The government appears to believe the system is being abused by some holiday home or second homeowners. Increasing the level to 182 days will severely impact genuine business owners going about their lawful business and would in effect be a restraint of trade and not targeted at the intended persons.</p>

<b>Business Details</b>	one four-bedroom self-catering cottage in rural location of Hodgeston , Pembrokeshire.
<b>Short Description</b>	purchased 16 months ago after being for sale for a period of four years. As far as I am aware, it was built as part of a B&B business in Hodgeston in 1980 and then sold

	<p>separately from the B&amp;B business, which is also still trading. It was let as a holiday cottage since at least 2012 but probably from the moment it was built. The cottage is available for holidays to holiday-makers with dogs, thus attracting to Pembrokeshire a group of holiday-makers who are not able to stay in hotels and B&amp;Bs. The cottage is also attractive to large families and is accessible to people with limited mobility thus attracting another group of holiday-makers for whom hotels and B&amp;Bs may be not suitable.</p>
<b>Impact on the business of 182 threshold</b>	<p>The 182 threshold will be challenging to meet even for a well-established business like this self-catering cottage due to the strong slump in demand for holiday accommodation over the winter months. Since the purchase of this cottage 16 months ago, I spent all money received from letting the cottage (£18K), plus £7K of income from my full-time job not related to the holiday letting business, on maintenance, services and renovations to make it more attractive to holiday-makers during the off-peak season, with most of the money going to local Pembrokeshire businesses, such as KO Carpets (£1.2k), Tenby Glass (£4K), BN Cleaning Solutions (£3.5K), County Electrical Services (£1.6K), SAS aerials (£577), Glyn Davies Boiler Maintenance (£920), R G Clark Plumbing (1K), West Wales Holiday Cottages (£1.3K), K.P.Thomas (boiler oil, £800), etc. Last year, the cottage was let for 154 days. However, I am concerned that this and the following years with the travel abroad being no longer restricted, even with all improvements made to the cottage it may be not possible to reach the 182 days target and thus becoming liable to pay Council Tax although this is a properly run holiday-let business.</p>
<b>Personal impact</b>	<p>The impact of paying Council Tax will be that I will have less money available to spend on maintaining and improving the cottage and thus the cottage becoming less rather than more attractive to potential holiday-makers in Pembrokeshire especially in low- to medium-season. I may also need to consider cancelling the cottage cleaning service, which is currently £150 after each stay and travel to the cottage each Saturday to do the cleaning myself.</p>
<b>Turnover</b>	<p>The turnover in 2019 was £17.5K, of which all money was spent on maintenance, services and improvements. The turnover in 2021 was £18k, of which all money + £7K extra was spent on maintenance, services and improvements.</p>
<b>Incremental cost of Council Tax at cost</b>	<p>The council tax would be in the region of £1,250, which is the Pembrokeshire Council Tax for Band D.</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>The council tax would be in the region of £2,500.</p>
<b>Incremental cost of Council Tax at 300%</b>	<p>The council Tax would be in the region of £3,750.</p>

<b>Planning Permission restrictions</b>	I am not limited by planning Permission to only do short term lettings and no other restrictions apply.
<b>Any Other Comments</b>	

<b>Business Details</b>	a five bed holiday let on the outskirts of Tenby that I have owned since 2002.
<b>Short Description</b>	The property is available to rent approximately 9 months of the year and we only take minimum 4 day booking as the cost of change over and management of guests for any shorter period would be unviable. The three months I don't let are out of season when I would only get sporadic bookings which are difficult to manage.
<b>Impact on the business of 182 threshold</b>	<p>We regularly use the property with friend out of season and times when not rented. (We undertake maintenance and improvements often when staying). The location ,as not central, rents around 100 days a year. My family and extended family use around 80 days a year. We spend a lot of money in the town in shops and local resteraunts. I am a member of the sailing club and support lots of local events.</p> <p>I have been coming to Tenby all my life and have never seen such a divide between holiday property owners and locals driven by the media. The people running businesses are very welcoming but retired residents on the whole are unfriendly. They do not rely on the income that holiday makers bring and I think forget that Tenby was built as a holiday resort by rich coal merchants. I do not see the vast majority of these people spending money in bars and resteraunts and shops. A lot of residents live in large under occupied property buying on line, and eating at home. Perhaps you should think about tripling the rates on properties under occupied by locals. The house next door to ours is slightly larger has one lovely but elderly occupant and this has been the case for over a decade. The house on the other side also of similar size has two occupants.</p>
<b>Personal impact</b>	<p>The proposal to enforce a minimum rental period of 180 a year is going to be unviable to achieve. The proposed consequence from free business rates to triple domestic rates is frankly frightening. We have a mortgage to pay and such extreme measures would have major impact on our financial situation particularly with intrest rate and cost rising.</p> <p>I may be forced to sell the property as a result of these potential draconian changes. I wonder who will buy the property a wealthy business person who may choose to not rent the property at all which will be negative to local businesses and company who currently manage the properties change overs.</p>

<b>Turnover</b>	Our turn over is around 28k but bills: cleaning cost; advertising; maintenance, mortgage payments take up a large proportion of this.
<b>Incremental cost of Council Tax at cost</b>	Our current SBRR means that we currently do not pay rates. The rates we would pay without this relief would be £3210.
<b>Incremental cost of Council Tax at 200%</b>	Double rates (£6420)
<b>Incremental cost of Council Tax at 300%</b>	triple rates (£9630).
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	In conclusion I find the way you propose to vilify people who own holiday properties distasteful and rapacious. I think its driving a large divide in the community.

<b>Business Details</b>	Myself and my wife own a single self-catering holiday cottage purpose developed for self-catering holidays in Trefin, Pembrokeshire. The small profit from paying guests after maintenance, expenses and ongoing refurbishment costs form a major part of our modest retirement income.
<b>Short Description</b>	Our Self-catering holiday let was sympathetically developed by us in a terrace cottage which is over 250 years old in a conservation area in Trefin. The accommodation comprises 4 double bedrooms, all with ensuite shower/bathroom facilities with an additional downstairs WC. The terrace cottage has been specifically developed to appeal to small groups of walkers, as we are near the Pembrokeshire coast path, or families sharing. With an historic stone-built cottage over 250 years old our maintenance costs are very high and since we took ownership, we have replaced the roof with a new natural slate roof in keeping with the surrounding locality, upgraded the insulation on the rendered blockwork extension at the rear, replaced the boiler with a new more efficient combi boiler, added a cedar summer house, and major garden improvements (based on a plan by a local Landscape architect), carried out full redecoration internally and externally, added an electric vehicle charging point and have an ongoing program of internal furniture upgrades. We support local craft industries by providing all our paying guests with locally made cakes and hand made soaps for all the 5 wash hand basins in addition to a welcome pack for both adults and dogs.
<b>Impact on the business of 182 threshold</b>	The impact on our business of the 182 threshold will be to strip away all our profit and reduce the funds available for ongoing refurbishment e.g. the Kitchen refurbishment we had planned (the existing kitchen is of poor quality and over 20 years old) will certainly have to be cancelled with a loss of employment to local tradesmen. Any

	<p>available rents from lettings will need to be kept for essential maintenance such as replacement of our oil tank which we were informed last week was required following an engineer's inspection and the replacement of the TV which we have had to carry out over this past weekend following a paying guest complaining that our existing TV had stopped working. Such maintenance/refurbishment activities all give employment to local firms and businesses which we will inevitably have to review by actively seeking the lowest UK wide price.</p> <p>We have been trading since 2016 but in the 6 years since then the cottage has never achieved weekly lets totalling more than 20 weeks through local Pembrokeshire Holiday letting agents. The cottage, while available for 365 days per year, has never achieved anything like 182 days lets. Our average yearly lets are around 15 to 16 weeks. We only use the cottage ourselves at short notice when it has not been let and then we inevitably end up carrying out minor maintenance/replacement works as old cottages need regular maintenance every 6 to 8 weeks. We can see no way in which we would ever achieve holiday lettings totalling 182 days. Historic cottages such as ours require extensive regular maintenance.</p>
<p><b>Personal impact</b></p>	<p>The impact on us personally if the 182 day threshold is enforced is that we will need to consider whether or not we can continue with our self-catering holiday let business in Pembrokeshire or whether we would be better investing elsewhere in the UK. But with such a specifically designed holiday let cottage which has never achieved lets of over 20 weeks selling is likely to be at a loss and such a cottage is unlikely to be attractive to local purchasers as it would involve extensive renovation costs to convert to a family home as so many ensuite facilities would be a cleaning and maintenance nightmare for a normal family. Therefore, by selling we are likely to make a significant financial loss. To minimise our costs the best answer may be to withdraw from letting the cottage commercially, accept that we cannot maintain it at a level for commercial letting and try letting only to family and friends for enough to cover our out of cost expenses including Wales excessive Council Tax multiplier for holiday lets which do not achieve the 182 day threshold. This approach would obviously have a significant impact on the local business' we use such as holiday letting agents, cleaners/laundry and maintenance trades.</p>
<p><b>Turnover</b></p>	<p>Our Turnover from April 2019 to March 2020 was £11,693.35 and from April 2021 to end of March 2022 £17,483.32</p>



<b>Incremental cost of Council Tax at cost</b>	If we were on Council Tax rather than Business Rates and benefiting for SBRR (Small Business Rates Relief) we would be required to pay council tax of £1804.36 plus a surcharge of 300% which equals £5413.08 giving a total Council Tax demand of £7217.44
<b>Incremental cost of Council Tax at 200%</b>	If we were on Council Tax rather than Business Rates and benefiting for SBRR (Small Business Rates Relief) and the council tax surcharge was reduced to 200% we would be required to pay council tax of £1804.36 plus 200% which equals £3608.72 giving a total council tax demand of £5413.08
<b>Incremental cost of Council Tax at 300%</b>	If we were on Council Tax rather than Business Rates and benefiting for SBRR (Small Business Rates Relief) and the council tax surcharge was reduced to 100% we would be required to pay council tax of £1804.36 plus 100% which equals £1804.36 giving a total council tax demand of £3608.72
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	However, notwithstanding the above we would in fact support the council introducing a surcharge on second homes but that in the case of commercially let self-catering accommodation the basis of the threshold for commercial let self-catering accommodation should be reduced from 182 days per year to 105 days per year.

<b>Business Details</b>	A two-bedroom listed holiday cottage in a coastal location overlooking Cardigan Bay, New Quay, Ceredigion. Let through West Wales Holiday Cottages. Currently benefits from small business rate relief.
<b>Short Description</b>	Now in our fourth year of trading. The cottage is available to let all year round with minimum let period one week. Cottage purchased in 2016 in a poor state of repair. Modernised and improved sympathetically using exclusively local labour.
<b>Impact on the business of 182 threshold</b>	The current threshold has been achieved each full year of trading. Being a coastal location the high season is shorter than further inland since at each end of the season beaches become far less attractive due to the weather conditions. In addition, local attractions such as dolphin watch cruises, water sports centres etc. cease to operate meaning there is less for visitors to do. The affect is that even with lower out-of-season rates, achieving the 182 threshold may be difficult to achieve. Any annual surplus has been ploughed back into the business by improving the facilities even more and by annual maintenance to ensure the cottage continues to be well presented. Again, all this work has been carried out

	<p>by local tradespeople, as is the regular cleaning, gardening and odd-jobs during the letting season. Reviews provided by customers have been exceptional. Should we be penalised financially by reverting to council tax we would at best be unable to continue to keep the cottage in first class condition and at worst would have to close down the business as unviable. This would be a huge disappointment to our many returning customers, most of whom are Welsh or have Welsh connections.</p>
<b>Personal impact</b>	<p>The cottage was purchased from pension funds in 2016. Having recently retired but being still physically and mentally fit and healthy it was intended to provide us with a means to keep us active for as long as possible. We had not previously been involved in the hospitality industry, so it gave us a new challenge whilst enabling us to rejuvenate a beautiful but run-down property in the country where we and our children had spent many of our holidays.</p> <p>Although we never expected high returns on our investment, and as explained above any returns up until now have been put back into the business, if we fell below the 182 day threshold and were forced to revert to council tax or a multiple of council tax, that could certainly lead to a loss-making situation. This could force us into closing the business thereby depriving the Welsh Tourist Industry of a most attractive self-catering cottage and depriving us of an interest that keeps us active and involved.</p>
<b>Turnover</b>	<p>2019 – first year of trading - £8500 2021 – third year of trading - £19,500 The business growth illustrates the need for high class self-catering cottages in prime locations as an essential support for the Welsh tourist industry.</p>
<b>Incremental cost of Council Tax at cost</b>	£2172
<b>Incremental cost of Council Tax at 200%</b>	£4344
<b>Incremental cost of Council Tax at 300%</b>	£6516
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	My property is a 2 ½ -bedroom cottage situated approx. ½ mile from the Llechwedd Slate Caverns, in the popular town of Blaenau-Ffestiniog, Gwynedd
<b>Short Description</b>	I started my business in January 2020, and until the pandemic hit and lockdowns imposed, bookings were buoyant.
<b>Impact on the business of 182 threshold</b>	In response to the Welsh Government's proposal to change the Small Business Rates Relief criteria for FHLs from 70 days actual let to 182, I write to explain to you

	<p>the reality and devastating impact this proposed change in criteria will have on my own FHL business.</p> <p>The property is marketed with <a href="http://www.sykescottages.co.uk">www.sykescottages.co.uk</a> and is available to let 365 days per year, including short breaks, a “full income maximisation” contract is in place with the agent.</p> <p>I employ a local sole trader to clean and manage the changeover for me in addition to other local trades people as required. The last two years have been unprecedented, difficult, and I have yet to experience a ‘normal’ year of trading. The modest income (after operating costs) which I have achieved to date contributes to, and is a necessity for my overall income stream.</p> <p>I achieved the criteria for SBRR in September 2020. Quite frankly, whilst the property is available 365 days per year, the proposed 182 days actual let is absolutely unachievable for me in this area.</p>
<b>Personal impact</b>	<p>It goes without saying that after considering the aforementioned, mortgage costs, rising utility bills, maintenance costs etc, my business will be absolutely unavailable if the proposed changes to SBRR criteria come into effect, and I will be forced to sell the property. Closing my business will have a detrimental effect on my income, health and wellbeing in already difficult and insecure times. Similarly, I will have to lay off my house keeper which will bring about further effects on her own livelihood.</p> <p>I feel very vulnerable, insecure and distraught by the threat of this new proposal. I run a genuine FHL business and strongly dismiss the fact that I, with many other fellow genuine FHL businesses are labelled “second home owners”. I not only serve my guests, but also feed the local tourism industry and the community of Blaenau Ffestiniog.</p> <p>I urge the Welsh Government to reconsider their proposal, or at least review the criteria that is a fairer and more proportionate model that reflects the diverse range and localities of genuine FHL business communities.</p>
<b>Turnover</b>	<p>On average I achieve a gross rate of circa £115 per night. In 2020 I earned a net income of £8312.60 (after commission and VAT), and in 2021 I earned £15,770.70 (after commission and VAT).</p>
<b>Incremental cost of Council Tax at cost</b>	£1472
<b>Incremental cost of Council Tax at 200%</b>	£2944 (200%)
<b>Incremental cost of Council Tax at 300%</b>	£4416 (300%)
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>Furthermore, with the easing of overseas travel restrictions, significant rises in energy and fuel costs, plus</p>

	the impact of the war in Ukraine, I am already seeing a slow-down in the number of bookings in 2022 compared with 2021.
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<b>Business Details</b>	2 bedroom holiday let accommodation in Tenby Pembrokeshire
<b>Short Description</b>	This is a 2 bedroom property that is located above a number of bars/restaurants. I've owned this since February 2019 having purchased from someone who was using it as a second home.
<b>Impact on the business of 182 threshold</b>	Being located above a number of commercial properties, my business is not suited to being a full time accommodation for the local area. My property was let for 41 nights in 2020 and 85 nights during 2021 with the main peak being short term (3-5 day lets) during June, July and August. This is despite being available on AirBnB for 51 weeks in 2020 and 49 weeks in 2021. My guests also contribute to the income for the café, bar and two restaurants underneath us. A council tax surcharge would mean that I would need to increase my prices so taxing Tenby's holidaymakers
<b>Personal impact</b>	Personally, the 182 day threshold makes it almost impossible to see how I can keep registered as a business. That would require a completely full 6month period, with no allowance of changeovers, cleaning or maintenance. That would effectively be from end March through to end September. I don't mind paying a fair council tax to the community for the services my guests use. What I object to us being a cash cow and an easily targeted source of revenue under the guise of 'helping locals'
<b>Turnover</b>	In 2019, I wasn't open due to Welsh COVID restriction, 2020 my turnover was £4,883,62 and £10,208.50
<b>Incremental cost of Council Tax at cost</b>	This would normally be in region of £1,300
<b>Incremental cost of Council Tax at 200%</b>	This would be in the region of £2,600
<b>Incremental cost of Council Tax at 300%</b>	This would be in the region of £3,900
<b>Planning Permission restrictions</b>	I am limited from offering long terms lets on the property and it was purchased from an existing second home owner
<b>Any Other Comments</b>	

<b>Business Details</b>	We have one holiday cottage which lies in the Cambrian Mountains, Ceredigion.
<b>Short Description</b>	allowing access to beautiful countryside, rich in wildlife and steeped in history. It also has access to the coast and many tourist attractions. Very central in Wales and easy access throughout Wales. We have been trading for around 12 years.

<b>Impact on the business of 182 threshold</b>	This would very much affect our business. There are lots of things that effect the number of days we can let, such as time of year, weather, also people with children can only go at school holidays and people in general go on other different types of holidays such as abroad. As the pandemic hopefully lessens in nature and severity and dies down, people will start going abroad again. This idea of 182 days is unfair and has not taken in to account the feelings and livelihoods of the self catering and tourism industry. The majority of our years have been 80-100 nights.The attractions rely on people who come on holiday and use self catering.This would seriously affect our business and all our hard work would be ruined. We have put a lot of money and effort in to our converted barn, encouraging holiday makers in to Mid Wales to enjoy the history, wildlife, environment and local attractions. There is a good chance we would have to close, which we do not want to do.
<b>Personal impact</b>	This would place alot of stress and pressure on us, which we do not deserve and would destroy us and our feelings.We certainly do not want this to happen at all.Who ever thought of this does not understand the tourism industry and businesses in Wales.
<b>Turnover</b>	Turnover in 2019-2020 = £4,888 and 2020-2021= £7,133
<b>Incremental cost of Council Tax at cost</b>	Rateable Value £ 1900. Rv for period is 1900.Non Domestic Debit = $1900 \times 0.535 \times 365/365 = 1016.50$ .Property is subject to Small Business Rate Relief = -1016.50.TOTAL CHARGE FOR PERIOD = 0.00.we benefit from SBRR (Small Business Rates Relief)= 100% relief
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	We can only use it as a self catering property with self catering.There are many factors and other parameters that affect our buisness as per 4/5.
<b>Any Other Comments</b>	The Welsh Government should do the following:-  <ol style="list-style-type: none"> <li>1. Go after the people who arn't genuine self catering businesses , which we are</li> <li>2. Look at a way of stopping and reducing planning permission for people who try to set up self catering businesses from now on</li> </ol> They should assist people like us, who are genuine self catering businesses, not hinder them

<b>Business Details</b>	A single self-contained holiday cottage with garden, in the centre of St Davids, Pembrokeshire.
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<b>Short Description</b>	I have been trading since June 2002.
<b>Impact on the business of 182 threshold</b>	While this year I have already comfortably met the proposed 182 day letting threshold, this is partly due to the continuing increase in demand for staycations resulting from the pandemic. As I normally close the house from early November to the end of January (I cannot guarantee it being warm enough for demanding guests), if we return to a more “normal” pattern of booking, it might be harder to meet this threshold. I have no problem in meeting the current threshold of 140 days availability, 70 days let.
<b>Personal impact</b>	If I was unable to meet the proposed increased threshold, and became liable to pay an inflated (200% or 300%) level of council tax, I would probably have to close the business as the extra cost would make it uneconomic. I would also then have to make one permanent employee and a part time handyman/gardener redundant.
<b>Turnover</b>	Turnover 2018/19: £13,000 Turnover 2019/20: £19,700 Turnover 2020/21: £12,000 (Turnover is calculated on a tax , rather than calendar, basis)
<b>Incremental cost of Council Tax at cost</b>	Uncertain. Rateable value as per the National Non-Domestic Rate notice I have received for 2022/3 is £3600 and notional charge is £1926. I do not know which council tax band applies to my property, so I don't know if the figures supplied under questions 7-9 are accurate, but I know that my next door neighbour (in a very similar house) is in Band E. Looking up Band E suggests I would pay Council tax plus police and crime commissioner precept totalling £4,617.
<b>Incremental cost of Council Tax at 200%</b>	£3,078
<b>Incremental cost of Council Tax at 300%</b>	£5,778
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Two self catering holiday cottages onsite on our smallholding, Nr Abercych, Carmarthenshire
<b>Short Description</b>	rural location and near coast. Been trading for 4 years.
<b>Impact on the business of 182 threshold</b>	The new threshold of 182 days will put the business under a lot of extra pressure. The holiday industry in Wales is very seasonal with most of the business done from April-September. We do get business outside of these months but it is only the odd long weekend booking. We are lucky in that we are both rural and near the coast so we do attract some guests outside of the

	<p>main months. However, all we need is a long period of bad weather, fuel crisis, energy crisis, overseas war etc and you notice a sudden reduction in the amount of enquiries. For example, we're fully booked for July and August this year, but by now we'd usually be fully booked for May and June but I still have plenty of weeks to fill with a significant lack of enquiries and bookings - this seems to be a general feeling across holiday accommodation owners, especially noticeable since the energy and fuel crisis.</p> <p>Last year our occupancy was 57% on one cottage and 54% in the other. This is very close to the new threshold to meet 50% occupancy. All we need is some setback and it is very possible we may fall beneath the necessary occupancy rate and then be stung with a whopping council tax bill.</p> <p>I understand the need to reduce the amount of second homes, but in our situation, our two holiday cottages are on our smallholding and on the same site as our family home. We have not taken houses off the local market as second homes, we have actually saved a couple buildings from becoming derelict and unusable - we should not be penalised for this.</p>
<b>Personal impact</b>	I personally do all our own advertising, social media presence, bookings etc, we do not have any agency involvement, this is 100% a family business and our only form of income for our family. This new threshold means a lot more work for me trying to further my reach with social media, a lot more of my time spent doing this, and a lot more stress if I don't get the result necessary.
<b>Turnover</b>	In the 2018/19 tax year = £22688; In 2021/22 tax year = £36920
<b>Incremental cost of Council Tax at cost</b>	We would have to pay £3103.
<b>Incremental cost of Council Tax at 200%</b>	We would have to pay £6206.
<b>Incremental cost of Council Tax at 300%</b>	We would have to pay £9309.
<b>Planning Permission restrictions</b>	Our current permission of use is for short term lets only.
<b>Any Other Comments</b>	

<b>Business Details</b>	Our Property is a converted barn situated on the outskirts of Devils Bridge, Ceredigion.
<b>Short Description</b>	The income and expenditure from the property is divided between my wife and myself and returned to HMRC in accordance with the income tax rules for holiday lettings. It has always been available for letting, in line with current requirements, for more than 140 days and actually let for more than 70 days throughout except for 2020/21 (due to Covid 19 closure restrictions).

	<p>The property is a stone barn constructed c 1780. We bought it in a derelict state in 2013 with planning permission for conversion into a 3 bed dwelling. There was no local interest in taking on the project. We converted the property over the period 2013 to 2015/16, using local labour and materials. It has been available to let 365 days a year for the past 16 Years ending 5 April 2022. (NB we operate and report in tax years)</p>
<p><b>Impact on the business of 182 threshold</b></p>	<p>For the 12 years ended 5 April 2018 we have let the property for an average of 146 days per tax year with an average gross income of £6,770 and average loss after expenses and mortgage interest of £330. We have chosen 2018 as an illustrative break point as the following years were less typical. In the years ending 5 April 2022 lettings have fluctuated wildly. 2019 was 92 days due to the uncertainty created by Brexit; 2020 was a little better at 126 days but restricted by Covid 19; 2021 was 51 days due to Covid 19 and significant restrictions on access; and the tax year ending tomorrow 2022 will be 159 days due to increased staycationing in the summer of 2021. For our property which is 12 miles from the seas the peak letting season is quite short, whilst we do get some low and medium season lettings there is no way, even by dropping our prices to an uneconomic level, that we could seriously expect to achieve, let alone exceed, the proposed 182 days threshold. We think the Council Tax on our property would be just under £1,800. If we fail to meet the new 182 day threshold, the business would be untenable for us assuming we would be paying Council Tax in lieu of Business Rates especially if it were the proposed levy of 300%! The additional costs of Council Tax on top of insurance and electric heating for a 240 year old barn will be beyond our means.</p>
<p><b>Personal impact</b></p>	<p>we would be mortified. It could well end our association with Aberystwyth and Mid Wales which goes back to 1969 when we started as students at the University. More of a wrench for my wife Louise, who was born in Carmarthenshire and speaks Welsh as her first language, she would feel exiled. In converting the barn from its derelict state we always intended to let it to contribute to the local tourist industry. There was no local interest in taking on the conversion. We have ploughed money into local tourism and employment over the years, as have our visitors. If we disappear we are sure many other small self- catering outlets will also flounder so where will prospective visitors to Wales find sufficient accommodation – more caravan parks? We would also be saddened by the financial impact on our excellent lettings agency “West Wales Cottages”. We do not know if our cleaner and gardener could make up the loss of income.</p>
<p><b>Turnover</b></p>	<p>for the year ended 5 April 2019 was £6,075 (low due to Brexit as indicated above). Our turnover for the tax year</p>



	ended 5 April 2021 £3,662 due to significant Covid19 restrictions/closure.
<b>Incremental cost of Council Tax at cost</b>	We believe our Council Tax would be circa £1800 if we were paying that in lieu of Business Rates. (NB we have never been assessed for Council Tax.) We currently benefit from SBRR for 2022/23.
<b>Incremental cost of Council Tax at 200%</b>	Council Tax would be £3,600
<b>Incremental cost of Council Tax at 300%</b>	Council Tax would be £5,400
<b>Planning Permission restrictions</b>	property is fully Residential so we are not limited to only providing holiday letting.
<b>Any Other Comments</b>	

<b>Business Details</b>	<p>Self-catering holiday rental business near Little Haven and another at Porthgain.</p> <p>Properties occupied by owner for short periods primarily for maintenance.</p> <p>Both properties are made available for rental for 48-50 weeks p.a.</p>
<b>Short Description</b>	<p>2 properties:</p> <ul style="list-style-type: none"> <li>- Welsh stone semi-detached Cottage (one of ten cottages converted from traditional stone-built barns in a rural location) in walking distance of Little Haven. Built up business over a 12- year period since April 2010.</li> <li>- Lodge of Nordic spruce construction (rural location) on a site of 19 Lodges in walking distance of Porthgain. Business has grown over a 9-year period since Jan 2013.</li> </ul>
<b>Impact on the business of 182 threshold</b>	<p>The business in both properties is substantially seasonal in nature with high occupancy rates in the Summer (7 weeks period: 16th July – 3rd September) and Half Term Holidays (2 weeks period) – total of 63 days.</p> <p>Business outside these core periods needs to be built up over a number of years (in an increasingly competitive environment) through a regular program of maintenance and investment in the quality of services offered by the properties.</p> <p>Despite recent increases in business as a result of a move towards ‘Staycations’ in Wales (in response to the pandemic) the newer business still struggles to achieve the 182 threshold. As overseas travel continues to increase post pandemic then this threshold will become increasingly difficult to achieve. Any increases in costs (based on bookings volume) will inevitably affect newer businesses, that are trying to establish themselves, disproportionately compared to the more established businesses.</p> <p>Cost increases mooted could easily force the closure of one and possibly 2 of our business properties as they are run as a business generating cashflow– representing the pension fund of one member of the couple.</p>

	<p>During the years that we have run the 2 properties, we have become increasingly aware of the positive impact that self-catering businesses have on the local economy. The properties are maintained and improved using local tradesman and all the changeovers are performed by locals offering cleaning and caretaker services. Guests clearly bring a significant amount of tourism trade to the area &amp; it has been clear that in periods of uncertainty of this trade there has been considerable turnover of businesses – cafes, restaurants. Pubs etc. in areas such as Little Haven, Broad Haven and St Davids.</p>						
<b>Personal impact</b>	<p>The impact on owners and local area  We have invested in excess of 12 years in the Pembrokeshire area and we are proud of the businesses and local relationships that we have created. As a Welsh family we have always had an affinity to the area and hold strong views on the proposed changes to Business rates.  Post pandemic there is a need for areas like Pembrokeshire to gradually recover over a period of time (10 years+). The possible changes to Business Rates are likely to push back the recovery of the area even further in the short term.</p>						
<b>Turnover</b>	<p>Turnover in 2019 and 2021(of the 2 properties)  FY19 £27,316  FY21 £15,872</p>						
<b>Incremental cost of Council Tax at cost</b>	<p>For the financial year 2022/23 we are receiving Small Business Relief o :</p> <table> <tr> <td>Cottage</td> <td>£1,926</td> </tr> <tr> <td>Lodge</td> <td>£1,444.50</td> </tr> <tr> <td>Total</td> <td>£3,370.50</td> </tr> </table>	Cottage	£1,926	Lodge	£1,444.50	Total	£3,370.50
Cottage	£1,926						
Lodge	£1,444.50						
Total	£3,370.50						
<b>Incremental cost of Council Tax at 200%</b>	total £6,741						
<b>Incremental cost of Council Tax at 300%</b>	total £10,111.50						
<b>Planning Permission restrictions</b>	Both properties are limited by planning Permission to only do short term lettings and owners are unable to occupy the properties for greater than 30 days consecutively.						
<b>Any Other Comments</b>							

<b>Business Details</b>	1 bungalow in Newport Pembrokeshire
<b>Short Description</b>	successfully trading for 5 years as self catering accommodation for 6 people
<b>Impact on the business of 182 threshold</b>	if we are unable to sustain that level of bookings we would be forced to sell the property as the proposed council tax charge would be more than our net turnover. The knock on effect of this proposal would be that the business would be wholly unsustainable. I would anticipate that the home would be sold to a 'wealthy'

	outsider who can afford the new council tax or to a wealthy local person. I can't see these homes ever falling in price sufficiently to provide affordable accommodation to local people. Surely there is enough developable land in public sector control for local authorities to address the local housing need? For me this proposal has created a real sense that Wales is not a sensible place to do business or to invest. It completely undermines investor confidence for those who work hard to create very modest businesses. Coupled with that is the adverse impact on the businesses of those who support self catering (the lettings agents, gardeners, cleaners, caretakers, window cleaners and the entire building trade that this industry sustains). Once you layer onto that the lack of hotel accommodation in Pembrokeshire, one wanders how an economy so reliant on tourism will be sustained. In short, where on earth will tourists stay?! Second homes, the energy crisis and rampant inflation will be the least of your worries when the entire local economy crashes. Ultimately, home owners have an asset that they can sell perhaps at a loss. But local trades and businesses don't have that option if you take away the spending power that tourists bring and on which much of Wales (especially Pembrokeshire) relies.
<b>Personal impact</b>	This is my only income and is less than the proposed upper level of council tax - if imposed it would effectively equate to a 100% tax rate so not a great incentive to keep going!
<b>Turnover</b>	in each year c£9,000 before mortgage costs
<b>Incremental cost of Council Tax at cost</b>	c£5,000
<b>Incremental cost of Council Tax at 200%</b>	c£7,500
<b>Incremental cost of Council Tax at 300%</b>	c£10,000
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Large detached 5 double-bedroomed luxury seaside house in one of the most desirable locations on the lyn peninsula. Gwynedd.
<b>Short Description</b>	Property bought in 2015 by myself as a 'fhl' and have continued trading as such. Prior to my ownership it was known to have traded as a business rated 'fhl' for many years. Marketed by quality cottages throughout. Property has been maximally available to let for 365 nights per year during my ownership except for essential maintenance, construction work, and bathroom upgrading.
<b>Impact on the business of 182 threshold</b>	The impact on my business will be enormous. After considerable purchase & set up costs, and then installation of a hot tub and internal improvement

	<p>projects over the past 4 years to attract increased occupancy, 2022 was due to be the first year I would finally get to make any reasonable net income. Together with energy bills rising from last year's £3,000 to a predicted minimum of £9,000 this year (with the trebling of heating oil costs &amp; the doubling of electricity prices) plus increased labour, mortgage, changeover &amp; other fixed costs, the introduction of the 182 night threshold would now put this in real jeopardy.</p> <p>Despite it being described by the agent as one of their most desirable and best performing properties, 2022 is the first time in nearly 7 years of ownership that current bookings have finally reached the 182 night proposed threshold. Notably, some of these bookings are deferred bookings from the 2020 Covid lockdowns and others may yet cancel with the current continued economic difficulties or preferred foreign travel.</p>
<b>Personal impact</b>	<p>Having a defunct occupational pension, I bought the property (an established and successful FHL) using my life savings topped up with a 'holiday let' mortgage, to provide a long-term dependable investment and personal pension income for me. Hitherto, property had always been regarded as a safe and dependable investment. This prudent &amp; responsible approach to providing a personal income in retirement, and thus avoiding the need for state benefits, is likely to be lost if the proposed 182 nights threshold is introduced. This proposal has also placed enormous added emotional stress, on top of the already monumental stress of losing both my brothers during the Covid-19 pandemic, and the financial uncertainty &amp; unfair attack on my 7 years of hard work and considerable financial investment are now causing me sleepless nights.</p>
<b>Turnover</b>	<p>Information for the tax years ending 05th April each year, and in brackets the surplus after costs: tax year 2017-2018 t/o £26,597 (-£10,593); 2018 -2019 t/o £34,154 (+ £1,272); 2019-2020 t/o £36,949 (+ £120). The figures for 2020-2021 are skewed by the Covid pandemic and the 2021-2022 figures aren't finalised but expect to finally show an improved surplus.</p>
<b>Incremental cost of Council Tax at cost</b>	<p>My property has been considered a legitimate FHL business by Gwynedd Council for many years &amp; currently benefits from SBRR @100%. I do not know what the Council Tax band would be but based on Council Tax bands of similar sized neighbouring houses:  Band 'F' Council Tax + 100% loading: £ 6,318.60  Band 'G' Council Tax + 100% loading: £ 7,582.32</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>Band 'F' Council Tax + 200% loading: £ 9,477.90  Band 'G' Council Tax + 200% loading: £11,373.48</p>

<b>Incremental cost of Council Tax at 300%</b>	Band 'F' Council Tax + 300% loading: £ 12,637.20 Band 'G' Council Tax + 300% loading: £15,164.64
<b>Planning Permission restrictions</b>	No planning Restrictions on letting availability.
<b>Any Other Comments</b>	

<b>Name</b>	
<b>Business Details</b>	Chalet at nolton haven ,haverfordwest
<b>Short Description</b>	I own the above chalet. It is not a house... you cannot live in them.
<b>Impact on the business of 182 threshold</b>	I rent out the property for about 70 days per year ,rising to 100 in a good year.
<b>Personal impact</b>	
<b>Turnover</b>	My turnover is about £4500 per year ,less during the COVID pandemic.
<b>Incremental cost of Council Tax at cost</b>	
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	These new regulations will cripple me. If I have to pay 200 % I will have to sell the chalet.  Locals looking for a home will not be able to buy them. No one can afford this tax ,so the price of the chalets will plumett.

<b>Business Details</b>	Lodge Cottage at Jameston
<b>Short Description</b>	Lodge Cottage and we are in the process of building 2 new holiday let properties. We started letting our cottage 7 years ago.
<b>Impact on the business of 182 threshold</b>	We have been providing holiday makers with a luxury holiday cottage which is suitable for generational families. As it has a ground floor bedroom we find a lot of our bookings allow families to come together. This in turn brings income to the local businesses in the area especially at quite time of the season. If we were to stop letting for holidays it be a loss to the whole community.
<b>Personal impact</b>	Personally if we did not let our property it would affect us financially. But it would also take away from others business. With the new rules it means we have to have it up for letting so we cannot use it either. WG is penalising us for working hard and bringing customers to Wales. Also the affect of this ridiculous condition of 182 days has on our mental health. As we will have at least two if not 3 in the beginning for holiday let's which 2 are also restricted by planning as holiday let's. This will not make

	people put them into use to resolve homelessness it will just mean they will sell yo people who will use them even less but have money to leave them empty.
<b>Turnover</b>	Our turn over 2019 163 days and 2021 173 days it seems impossible to hit the 182.
<b>Incremental cost of Council Tax at cost</b>	Council tax £1568 per property so £4704 in total if we had 3 for rent.
<b>Incremental cost of Council Tax at 200%</b>	Council tax plus 200% £4704 per property so £14,112 for 3
<b>Incremental cost of Council Tax at 300%</b>	Council tax plus 300% £6272 per property so £18,816 for 3.
<b>Planning Permission restrictions</b>	The two new builds which should be finished next year are restricted by planning.
<b>Any Other Comments</b>	

<b>Business Details</b>	Seaside apartment overlooking Cardigan Bay in Aberystwyth.
<b>Short Description</b>	Comprises 2 bedrooms, hall, lounge, kitchen, shower room. Sleeps 4. Trading since May 2017.
<b>Impact on the business of 182 threshold</b>	<p>Before 2019 we had rented the property to tenants during the autumn and winter months and then offered it for summer lets from April through to September. After a successful trading year in 2019 we applied for Small Business Rates Relief and this was granted in 2020. Unfortunately lockdown then occurred and we had to suspend all trading until August.</p> <p>In 2019 we had 107 nights booked between April and September. That's out of a possible 183 days in that period. From our experience there is little holiday trade to be had after September. This is evidenced by our own numbers which are no more than a handful during the period October to March. Therefore in order to meet the 182 day threshold we would have to run at full capacity between the months of April to September. We don't believe this is achievable.</p> <p>Our profit margins are low and if we were unable to achieve the 182 threshold and lose relief this would further reduce our margins. Ceredigion Council currently has a 30% discretionary premium for a second home. If they were to apply a 200% or 300% premium this would be the death nell for our business and we'd have to close</p>
<b>Personal impact</b>	We are former students at Aberystwyth where we met in 1972 and married in 1973. When we celebrated our 40th wedding anniversary in 2013 we had a holiday in Aberystwyth and then in 2015 bought our flat there. We planned to use it as a holiday let which we could also visit, as the town has such special memories for us. We hoped that the holiday let trade business would help us

	<p>in our retirement. Unfortunately just as the business was starting to grow, we had the impact of Covid and in 2020 and 2021 we made losses. Last year's income was unfortunately eroded by a substantial bill to re-render and paint the front of the entire building that we share with other owners.</p> <p>With business starting to return to normal, we are once again enjoying a healthy volume of bookings and we felt positive about being able to recover our losses. However, if this draconian threshold is applied, we fear that we'll be hit financially, as we don't believe these numbers are achievable. Should it be applied and we lose business relief then the only option left to us will be to cease trading and sell the property.</p>
<b>Turnover</b>	<p>2019 = 110 paying guest nights between April and October. No further business until early March 2020.</p> <p>2021 = 71 paying guest nights between March and December. Numbers were reduced due to a combination of official restrictions, cancelled bookings and our own restrictions. For the protection of our cleaners and other residents in the building we had 'fallow' weeks between bookings, i.e. week 1 available to guests, week 2, not available, week 3 available to guests, week 4 not available.</p>
<b>Incremental cost of Council Tax at cost</b>	£1498
<b>Incremental cost of Council Tax at 200%</b>	£2996
<b>Incremental cost of Council Tax at 300%</b>	£4494
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	
<b>Business Details</b>	2 Properties
<b>Short Description</b>	<p>I have let 1 property for 14 years and the other for 5 years</p> <p>One property is inland and the other coastal The more recent property ( Coastal ) had been empty for almost 3 years and was semi derelict requiring a one year programme to repair when purchased</p>
<b>Impact on the business of 182 threshold</b>	<p>We have achieved approximately 130 days over the last 14 years in property one generating a small profit</p> <p>We switched to business rates 4 years ago when the rates were increased to 150% as at this level we could not make a profit</p> <p>The second property was purchased in 2017 as a business asset as i switched jobs</p>

	<p>It has not made a profit yet as is building its customer base and has achieved an average of 130 days though achieved 150 days last year</p> <p>182 days is almost impossible to achieve in Wales so would effectively reduce the profit to a level that could make it unviable</p> <p>It is a shame as the first property is in a village where all the neighbouring properties have been purchased by retired couples from England since we purchased in 2008</p> <p>The second property would probably still be empty as it had been empty for almost 3 years having previously been occupied by a retired couple</p> <p>They vacated as its isolated location made it unsuitable for their ailments and moved to a house in Fishguard</p>
<b>Personal impact</b>	<p>The impact on me would be to change my work plans as the holiday lets represent the majority of my earned income</p> <p>I invested for the long term and very much enjoy providing holiday accommodation in the area</p> <p>Both houses Sleep 8 and bring much needed holiday makers to the area keeping local shops, restaurants and visitor attractions active</p> <p>We also employ local cleaners, gardeners, handymen and pay commission to a local Welsh letting company that employ a large local team</p>
<b>Turnover</b>	The turnover in 2019 was circa £50k and £60k in 2021
<b>Incremental cost of Council Tax at cost</b>	Council tax would be circa £6000 at 150% in 2021
<b>Incremental cost of Council Tax at 200%</b>	Council tax would be £8000
<b>Incremental cost of Council Tax at 300%</b>	Council tax would be £12000
<b>Planning Permission restrictions</b>	Not Limited by planning
<b>Any Other Comments</b>	

<b>Business Details</b>	The holiday accommodation has two bedrooms and Little Haven is a coastal location.
<b>Short Description</b>	We purchased a property in Little Haven, Pembrokeshire in April 2021 which includes as an Annex a self-contained furnished holiday let.
<b>Impact on the business of 182 threshold</b>	The popular tourist season in Little Haven really only operates from Easter to the October half-term. This year that comprises a period of 30 weeks. Our accommodation is available to let outside those periods but has only rarely been used. Based on our first season of lettings, which we recognise was favourably impacted by COVID as international travel was severely restricted, we believe that it would be highly unlikely that we would meet the 182-day requirement. In effect our accommodation would need to be occupied for 26 of the 30 weeks in the season (87%) despite many of the weeks being outside the school holidays.



<b>Personal impact</b>	If the Annexe was assessed to Council Tax this would severely restrict the income available to us during our retirement. Significant increases in Council Tax could make the letting of the property uncommercial and we would simply use it for friends and family. This would have no benefit whatsoever on the housing stock available to the local community as the property is an annexe and not available for separate sale. All that would happen is that the contribution which our property makes to the local tourism industry would cease – and this is the lifeblood of most of the businesses in the village. The impact on the Welsh language would be negligible as Welsh is rarely spoken in the west of Pembrokeshire.
<b>Turnover</b>	Our turnover in 2021 (our only year of operation) was approx. £22,000.
<b>Incremental cost of Council Tax at cost</b>	The Council Tax assessment for the Annexe in 2021-22 was £1,829, which we paid before the property was moved into the Business Rates system, and this has increased by 4.6% to £1915 for 2022/23.
<b>Incremental cost of Council Tax at 200%</b>	Council tax assessed at 200% would cost £3,830 a year,. The vast majority of these additional costs could not be passed on to the holidaymakers, as our property would become uncommercial.
<b>Incremental cost of Council Tax at 300%</b>	at 300% would cost £5,745 a year
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Holiday cottage at St Davids
<b>Short Description</b>	Rural location been trading since 2004
<b>Impact on the business of 182 threshold</b>	182 days letting is 26 weeks or 6 months the sun doesn't shine that long even in South Wales. I cannot force people to come even when let out all year.
<b>Personal impact</b>	I personally like letting the property out so other people can enjoy the beautiful surroundings and spend money in the local area to benefit the tradesmen or provide employment for local restaurants. If it is penal to let out then I will reserve it for just my family's use and it will then be empty for long periods of the year
<b>Turnover</b>	Turnover is circa £12k per year with 30% paid in commission to local letting agent which obviously would disappear along with £1k gardener, and cleaner.
<b>Incremental cost of Council Tax at cost</b>	Council Tax I guess would be £1400
<b>Incremental cost of Council Tax at 200%</b>	

<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	I would not let property out to long term let

<b>Business Details</b>	My husband and I have a holiday let cottage on the property which is a rural location in Bethania, Llanon in Ceredigion
<b>Short Description</b>	We have been letting out our cottage to holiday makers since 2015. We have our cottage available for 350 days per year, but this does not mean it is booked 350 days in a year, more like 150-170 days a year. Some years we just meet the business rates threshold and other years we breeze through it.
<b>Impact on the business of 182 threshold</b>	If what the council is proposing with a 200% or 300% increase if we don't meet the 182 threshold then it would put us out of business, we would have to close the cottage to holiday makers and we would have to find some other way of making an income from the property.
<b>Personal impact</b>	<p>The cottage is our main source of income and if what the council is proposing because of people that own two homes this would impact us tremendously in an negative way, we managed to receive the business rates and benefitting from the Small business rates relief since 2017.</p> <p>Our cottage is on our own property, the very same property we live on our selves, the cottage letting helps us to survive, we are providing a service to the welsh tourist industry which is really feeling the pinch with people afraid to book holidays due to the pandemic and the knock on effect it has played on the industry.</p>
<b>Turnover</b>	Our cottage turnover for 2019 was £12, 257 and for 2021 with some price increases was not much better at £14,767.
<b>Incremental cost of Council Tax at cost</b>	Without that relief from paying the usual council tax for this area, our council tax would be £192/ month in 2019 and up to £208/ month in 2021, and in 2022 the council tax for this area is £216/ month.
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	Please reconsider the drastic measures you ( the council) are proposing to take by using a blanket approach which will devastate a lot of small businesses in the industry.

<b>Business Details</b>	Holiday rental at Newport.
<b>Short Description</b>	6 bedroomed property which sleeps 10, let for holidays.
<b>Impact on the business of 182 threshold</b>	The property lets very easily to families in summer and at other peak holiday times. Out those seasons it is hard to let because it is too big for couples etc and there are many properties catering to smaller groups. In practice it would not be possible to let it for 182 days except at a rent which would not cover variable costs, so loss making. This does not mean that it is not a viable business. It makes a small profit at the current level of letting (around 110 days) and provides employment in the local community for cleaning, gardening, maintenance etc, as well as spend in the community by tourists staying in the property. To remove the property from the business rates system because it does not meet an arbitrary level of 182 days' letting would be unjust.
<b>Personal impact</b>	We let the property not because it is a major source of income for us but because it is better for the house to be occupied than unoccupied and because, as a matter of principle, it should not be left empty when the employment and income provided by running it as a business are valuable to the community. If the proposed changes go ahead and we are obliged to pay council tax at 200% or 300% we will have to consider seriously whether to retain the property.
<b>Turnover</b>	Turnover was £24k in 2019 and £22k in 2021
<b>Incremental cost of Council Tax at cost</b>	Council tax for 2022/23 would be approximately £4500, including 100% second home premium.
<b>Incremental cost of Council Tax at 200%</b>	£6750
<b>Incremental cost of Council Tax at 300%</b>	£9000
<b>Planning Permission restrictions</b>	We are not limited by planning permission in respect of short term lettings and to the best of our knowledge no other restrictions apply.
<b>Any Other Comments</b>	To add an extra point, it seems to me that the whole premise for these proposed changes by the Welsh Govt is wrong. We did not opt for a business rates regime in order not to pay Council Tax. In fact we carried on paying council tax for a period when our business qualified for business rates, and therefore for the small business discount to zero, because we felt that we were still using council services, eg roads etc. Then in dialogue with the council about waste collection we were told that as a business we were not entitled to domestic waste

	<p>collection services (fair enough) and furthermore that as a business it was compulsory to be on business rates. So we switched. It is fundamentally unfair that people running a genuine business and contributing to the local community should be penalised for not letting for an arbitrary number of days, which takes no account of the circumstances of the property/business. There are two alternatives which would be fair, or could be made fair: one is to rearrange the business tax regime so that single home holiday lets do not qualify for small business rates relief so that a normal business rate would be payable. Another would be to revise the second home council tax provisions so that a second home which is let and making a valuable contribution to the local economy pays council tax at the normal level. Only second homes which are empty when owners are absent or not sufficiently let should have to pay a council tax premium.</p>
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<b>Business Details</b>	a small wooden cabin sitting on the lower slopes of Carningli above Newport Pembrokeshire.					
<b>Short Description</b>	I have owned the property for almost 8 years, and have been running it as a business for the 5 years after being forced to take redundancy and subsequently downsizing and moving to Pembrokeshire. The rental money is my main source of income. My business supports pubs and restaurants as well as a number of local tradesmen.					
<b>Impact on the business of 182 threshold</b>	Prior to lockdown the property had a maximum occupancy of 140 days. The cabin is a popular and successful holiday property. Having a 182 day threshold to qualify for business rates is going to be extremely challenging to the vast majority of holiday properties. With living costs spiralling out of control for the foreseeable future, there will be an inevitable reduction in the number of people being able to afford holidays, making the 182 day threshold even more unlikely to be achieved					
<b>Personal impact</b>	<p>Reduce my costs and stop using local laundry and change over services. By way of example I pay £20 per hour for someone to clean and changeover The cabin, that is the going rate which is double the current living wage.</p> <p>Look for permanent employment thereby denying a 'born and bred' Pembrokeshire resident a job</p> <p>Claim benefits</p> <p>Sell the property, but given it is only suitable for holiday letting purposes it would be difficult to sell with the prospect of 300% increase in Council Tax, and the extra Stamp duty payable for second properties.</p> <p>Sell my home and move in to The cabin</p>					
<b>Turnover</b>	Tax Year	Rental Income	Band A Council Tax cost	Council Tax at 200%	Council Tax at 300%	Proportion of Income paid in tax at 200%/300%
	2018/19	£13,865	£832.78	£1,665.56	£2498.34	12% / 18%

	2019/20	£15,599	£832.78	£1,665.56	£2498.34	10.7% / 16%
	2020/21	£11,506	£832.78	£1,665.56	£2498.34	14.5% / 20.7%
<b>Incremental cost of Council Tax at cost</b>						
<b>Incremental cost of Council Tax at 200%</b>						
<b>Incremental cost of Council Tax at 300%</b>						
<b>Planning Permission restrictions</b>						
<b>Any Other Comments</b>	<p>None of these options have any benefit to the area or contribute to the aims of the policy being proposed by Welsh Government Furthermore if there is a reduction in the numbers of holiday properties like mine, it will reduce the numbers of tourist visiting Pembrokeshire and/or hand money to corporate business and hotel chains taking income from local businesses.</p> <p>I absolutely understand the issue of affordable housing in Pembrokeshire along with the rest of Wales but penalising a relatively small percentage of property owners who rely on the income to survive and contribute significantly to the local economy is not the answer. The Welsh government needs to focus on bringing sustainable jobs to the area.</p>					

<b>Business Details</b>	I have two purpose built self catering chalets in Mumbles (coastal location) that I rent out to holiday makers.
<b>Short Description</b>	I bought the first one (suitable for two adults and two children) in December 2019 and the second (two adults) in December 2020.
<b>Impact on the business of 182 threshold</b>	as it stands currently I have small business rate relief on these properties and according to my AIRBNB stats across the two properties I have 312 nights booked in what is looking to be a bumper year, although these are great figures it clearly leaves me short of the required 364 proposed
<b>Personal impact</b>	<p>I bought these to supplement my pension, I am 65 this year.</p> <p>If the legislation to increase the number of days let out to 182 goes ahead, I will be in great difficulty,...</p> <p>If I sell the properties I lose my sole stream of income until I get my state pension and these chalets cannot be bought as residential homes as they were only built as holiday homes, I imagine that I will lose on my investment as anyone buying these chalets will be in the same situation.</p>
<b>Turnover</b>	My projected turnover for this year is £20795.00
<b>Incremental cost of Council Tax at cost</b>	If I lose the small business rate relief, I will be liable for Council Tax of £2782.00 pa on current estimates, although if the proposals to go ahead and increase that by 300% it will be far greater.
<b>Incremental cost of Council Tax at 200%</b>	

<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	these are purpose built holiday chalets and as such can only be occupied for 10 months of the year
<b>Any Other Comments</b>	I have written to the Welsh Office asking about this and have been assured that out of the 1000 people surveyed, no one said that they would have any difficulty meeting the required number of days (really?), I have also been told that a pro rata adjustment for properties with limited occupancy will be at the discretion of the VO. I've written to the VO who know nothing of this, but are looking into the matter...they say they will get back to me.

<b>Business Details</b>	2 holiday cottages in the Hamlet of Llanon, Trevine.
<b>Short Description</b>	We have owned these cottages for over 40 years and had rented these out to the public for holiday lets during these years.
<b>Impact on the business of 182 threshold</b>	<p>The new proposed ruling of the 182 day threshold could have a bad effect on the business as we can never guarantee we will have as much as half a year's worth of bookings. The period our cottages are currently available for bookings is for most of the year, subject to some essential maintenance periods where major works need to take place to update / improve the cottages. However the general public choose not to book these, though they are available), normally between November to March. Bookings begin to pick up around Easter and improve as the summer months start.</p> <p>Pembrokeshire is mostly visited in the summer months. The current 70 days is a more realistic and achievable target as the greater amount of our bookings taking place between June to August. Given the nature of the bookings, Holiday lets are easily cancelled especially if our guests decide at the last minute not to come on holiday or choose to go abroad. Situations such as Covid further restrict the period we can offer to guests. Our holiday cottages rates are very reasonable as compared to Cornwall / Devon cottages so the rents are not high either. Our rents have been set (in relation to similar properties) by the booking agents.</p>
<b>Personal impact</b>	The impact this change would have on us personally would very much be subject to what the Welsh Government will charge for Business rates / Council tax and /or penalties imposed by them should we not fulfil the 182 threshold. Financially this could have a big impact on the business.
<b>Turnover</b>	Since 2020 we have been with the booking agents 'Coastal Cottages' and the booking periods were subject to covid restrictions. Our income from the bookings in 2021 was approx £14,000. This income is before all expenses such as electricity, water, maintenance,

	cleaning etc have been charged. There has been very little 'profit' over the years from this type of business.
<b>Incremental cost of Council Tax at cost</b>	I am not sure what Council Tax / Business rates would be chargeable on the properties from 2023 as lately there has been a nil charge on holiday businesses and I do not have a recent rating value. Nor am I aware if I will be able to apply for SBRR in 2023.
<b>Incremental cost of Council Tax at 200%</b>	The impact of a 200% and 300% increase in Council Tax charges could make the business unsustainable. I can confirm that my parents' holiday cottages are not their second home, they are used as primarily holiday homes for the general public to choose to stay and explore Pembrokeshire.
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	A final point, despite most of the year we have open a booking window available to our cottages as listed by Coastal cottages we can not force people to book and holiday in Pembrokeshire. If any changes are to be introduced to paying of Council Tax / Business rates it is important that a realistic and sustainable level be found in relation to income levels achievable on these properties from holiday lets.

<b>Business Details</b>	A 5*1bedroom penthouse apartment in Solva, Pembrokeshire
<b>Short Description</b>	My Property is a 1 bedroom apartment that has been let as a FHL through a local agency (Coastal Cottages of Pembrokeshire) on the rural Pembrokeshire Coast, now in it's 8th year of operating. It is part of a converted manor house which is in a quiet location. The majority of the 9 units at this location are run as holiday lets, with 1 or 2 held as private second homes.
<b>Impact on the business of 182 threshold</b>	The impact of the proposed 182 threshold of actual nights let will render this holiday let business unviable. Since 2015 the unit has been available throughout the full year (365 days) and has been let from 110 nights in it's first year, building progressively each year to 164 nights in 2019. In 2020 the no of nights declined due to Covid restrictions. Last year was exceptional due to travel restrictions, and would be the only year we would qualify under the new proposed threshold. Bookings so far this year indicate that the levels reached in 2021 will not be replicated. It would be unlikely that this business property would qualify for business rates under the proposed threshold.
<b>Personal impact</b>	If business rates criteria are not met, and council tax has to be paid on this property, then the business will be unviable and the apartment would be sold. Along with

	another holiday let property this is my main source of income. I would probably sell both and look for an alternative investment, or maybe other FHLs in another location in England.
<b>Turnover</b>	The turnover in 2019 was £13K with 57% of that going into the local economy. In 2021 the turnover was £16.5K with 58% of that being spent in the local economy (commission to a local holiday agency, cleaning, laundry, gardening, local tradesmen, local produce etc). Once other expenses (BT,electric,water,ground rent etc) my taxable income each year from this property was just above £3K. The running expenses during the past years have increased, especially cleaning due to Covid restrictions, hence although the turnover increased, the profit has not. These running expenses are also likely to increase over the next year.
<b>Incremental cost of Council Tax at cost</b>	If I were to pay Council tax to Pembrokeshire County Council, the property would fall into Band D or C (£952 or £1071 respectively). This would remove 1/3rd of the current profit.
<b>Incremental cost of Council Tax at 200%</b>	If I were to pay 200% or 300% Council tax as proposed then this would remove 2/3rds of the profit or all of it.
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	Due to its remote location and small size it would be unsuitable as a residential apartment. There are no restrictions upon it for this use. However if it could not function as a holiday let then it would most likely become a private second home. If this were the case, the local economy would lose this albeit small but vital contribution, alongside the contribution that guests make when visiting local attractions,restaurants,galleries etc.
<b>Any Other Comments</b>	

<b>Business Details</b>	A four bedroom self self catering property in Broad Haven let and managed by Coastal Cottages on our behalf.
<b>Short Description</b>	One self catering property let for holidays since 2007 (15 years).
<b>Impact on the business of 182 threshold</b>	It will be devastating for us if any more than 100% council tax is applied. Our margins are minimal and after tax, commission, utility bills and the general running costs of maintenance etc we accrue about 35-40% of any letting. Any increase in council tax over 100% would make the viability very questionable.
<b>Personal impact</b>	We would have to sell the property if there is an increase of over 100% council tax. If this property and hundreds like this are sold then the tourist economy would be severely damaged. We cannot guarantee that we will achieve over 186 lettings a year. It depends on so many factors, the state of the economy, political situation, covid, the weather etc.



	<p>We have been fortunate that the past two years we have exceeded over 186 days a year. However some years this has not been achieved and a more realistic figure then is around 150-160 days.</p> <p>In addition to paying guests we use the property ourselves mostly outside the summer season. Friends and family use it too. All these weeks of us contribute to the local economy. Indeed we property regularly supplies work for the local community with grass cutting, cleaning and local shops for refurbishment of the house. Local pubs and restaurants benefit too.</p>
<b>Turnover</b>	<p>2019 - £20190</p> <p>2021 - £23800</p>
<b>Incremental cost of Council Tax at cost</b>	We would have pay in excess of £2600 pa if the full 100 % council tax was applied
<b>Incremental cost of Council Tax at 200%</b>	£5250 +
<b>Incremental cost of Council Tax at 300%</b>	£7800 +
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Log cabin on our family farm, providing self-catering accommodation for up to 6 people in Wolfscastle, Haverfordwest, Pembrokeshire.
<b>Short Description</b>	been operating for 16 years to supplement farm income (this replaced a static caravan that had been available for holidays for many, many years).
<b>Impact on the business of 182 threshold</b>	To date we have been just over the 182 threshold every year, however, with the influx of holiday properties in Pembrokeshire since covid and our rural location (as opposed to the favoured coastal locations) and now the increasing fuel costs perhaps making holidays unaffordable, we are concerned that we may see bookings drop in the coming years through no fault of our own. We can't force people to come on holiday to us! We understand, and to a degree support, the reason that these changes are being made - we are facing a housing crisis in Pembrokeshire due to properties being bought for holiday rentals or second homes - but this is now penalising existing businesses which are genuinely supporting the local community and economy.
<b>Personal impact</b>	The personal impact that this will have is that we are running this as an additional income to my job and our farm, which my husband runs alone, 365 days of the year. We are already concerned that a drop in bookings will mean a drop in our income to support our family and the farm (which was encouraged to diversify into tourism...),

	<p>this could have a further financial impact on the business that we have worked hard to build. It also means that, if we need to shut for a longer period each year (out of peak season) to be able to balance all of our plates without added stress adding to mental health issues, we won't be able to do that. From April to October, we currently work 6-7 days a week. We can't work more.</p>
<b>Turnover</b>	<p>The log cabin is run as a part of our overall farm business, but the turnover from the self-catering on its own is around £10,000.</p>
<b>Incremental cost of Council Tax at cost</b>	<p>I don't know what the council tax would be; it's never been rated. Our business rates are £1605.00 with 100% small business rates relief.</p>
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	<p>The cabin was built under static caravan planning legislation to provide better quality self-catering accommodation, more in keeping with its location, and to provide income to supplement our family farm. We attained a Certificate of Lawfulness to replace the static caravan (which had been sited by previous owners of the farm around 40 years ago). Under the conditions for this, the size of the property has to be within the maximum sizes of a static caravan and we have to close for a minimum of 10 weeks per year, from January to March, to ensure that the property cannot be used for long term rental or as residential accommodation. We built the log cabin and it has never been used for residential accommodation. It is within the boundaries of our farm, so cannot be reasonably sold as a separate property. We are therefore not depriving anyone else of a former residential property and need to be able to make the property pay for itself within the peak season.</p>
<b>Any Other Comments</b>	

<b>Business Details</b>	<p>a four bedroom grade II listed property which provides self-catering accommodation for families (up to 6 people) in the popular tourist centre of St David's, Pembrokeshire.</p>
<b>Short Description</b>	<p>It is made available exclusively for let throughout the year. We have been trading on this basis for over 11 years and engage a cleaning team of four people; a gardener; laundry services; a maintenance man and a bin clearing service as well as buy in cottage supplies such as cleaning materials, welcome pack and ironmongery etc. from local shops.</p>

<p><b>Impact on the business of 182 threshold</b></p>	<p>The proposed rise of the current threshold will result in our business being at a serious disadvantage to the rest of the UK which will continue to benefit from the NDR/reduced rates regime(s), as we will have no choice but to try to pass on the extra costs being incurred. This will make Welsh self-catering holidays completely uncompetitive as against properties in Devon/Cornwall, the Lake District etc., as well as overseas' holidays. If it is treated as a "second home" in Pembrokeshire (incurring a 100% premium domestic rate charge), we estimate that we will have to charge £275 extra per booking, including bookings made "out of season" which, given other current cost pressures, is ultimately unsustainable. Such price increases will hit Welsh residents in particular, as approximately 50% of our bookings come from within Wales itself, all at a time when the cost of living is spiralling. The proposed 182 day threshold is totally unrealistic given the sector's actual letting patterns/the holiday season. The HMRC FHL rule of 105 days is demanding enough as the letting season is in effect confined to the 6 week summer holiday; a week at Christmas/New Year; Easter and up to 3 half term weeks which still leaves 4 or so weeks' bookings to be achieved during low season, mainly as short term bookings. We typically achieve around 120 days' bookings each year.</p>
<p><b>Personal impact</b></p>	<p>Our FHL rental income is currently our only income in retirement aside from a small part time job paying a national minimum wage. We have spent a considerable amount of money restoring Fossil House which is in a conservation area (we have currently a £55k accumulated loss with last year being the first time we made a net profit of £900). Ultimately the proposed changes will put us out of business and force a change of use. This will affect the four cleaners currently engaged; a gardener; a bin man; a maintenance man and a local laundry service (over the last 7 years we have spent an average £7,400 a year on these services) as well as indirectly affecting the wider Welsh tourism industry with a potential knock on effect on employment in pubs; restaurants and holiday attractions etc. if further accommodation is removed from the market and visitor numbers reduced as a result.</p>
<p><b>Turnover</b></p>	<p>Our turnover for the years 2019/20 and 2021/22 was £13,706 and £20,812 respectively. In the intervening 2020/21 tax year it was £13,320.</p>
<p><b>Incremental cost of Council Tax at cost</b></p>	<p>If our property in Pembrokeshire incurs Council Tax rather than Business Rates and benefitting from SBRR we will be charged £2,223 at this year's figures (£4,447 if it</p>

	incurs the current Pembrokeshire Council 100% premium charge as a “second home”).
<b>Incremental cost of Council Tax at 200%</b>	At 200% Council Tax the charge will be £4,447 (or £6,670 if deemed a “second home” and we are being charged a 200% premium).
<b>Incremental cost of Council Tax at 300%</b>	At 300% Council Tax the charge will be £6,670 (or (£8,894 if deemed a “second home” and we are being charged a 300% premium).
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	One ‘dog friendly’ 3 bedroom holiday cottage in Angle Village. (Let via Coastal Cottages of Pembrokeshire)
<b>Short Description</b>	Trading for 7 years.
<b>Impact on the business of 182 threshold</b>	I find it difficult to envisage that we have any prospect of meeting the 182 day threshold for holiday lets. Now in our seventh year of trading we are achieving (with Coastal Cottages’ help) a good level of bookings with around 22 weeks booked for this year with several customers returning year on year. These weeks take in Easter and an extended summer season stretching from late April to October half term. Outside of this time, we get the occasional week or long weekend but despite being ‘open for business’ and more than happy to accept bookings, the holiday makers are just not there for the months of November-March. The 182 days are therefore completely unachievable. For this reason, going forward I can’t see that we will continue to run 35 Angle as a holiday let as the financial penalty of the council tax will effectively wipe out any profit, especially as margins are already being squeezed due to fuel price increases.
<b>Personal impact</b>	In the short term it is likely that it will become a second home as the considerable effort in running it as a business will just not be worth it once any profit is wiped out by Council Tax. Going forward it’s likely that we will have no option but to put the property on the market.
<b>Turnover</b>	Jan – Dec 2020 - £8,714 (Income reduced due to Covid closure) Jan - Dec 2021 – £15,742
<b>Incremental cost of Council Tax at cost</b>	£1,249.17 (Band D)
<b>Incremental cost of Council Tax at 200%</b>	£2,498.34
<b>Incremental cost of Council Tax at 300%</b>	£3,747.51

<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	We own 2 self-catering properties ( one has just gone on to the market this year so not applicable yet) This property is in Llangrannog, Ceredigion, which has been a holiday let for over 15 years	
<b>Short Description</b>	<p>We bought the property in 2018 and have run this as a business since then. The cottage is located in the coastal village of Llangrannog and sleeps 6. We live locally, and the property is let out 365 days a year via West Wales Holiday Cottages, a local agency.</p> <p>We try and provide a wonderful experience for our guests. We promote local businesses and encourage understanding the Welsh culture and language. We have welsh phrasebooks on the property as well as promoting local artists and events.</p>	
<b>Impact on the business of 182 threshold</b>	<p>The business will struggle to survive and reach the 182-day limit even though we are available all year round. On an average year, we are looking at 140 days, including short breaks.</p> <p>We have invested heavily in the property and maintain this to a high standard each year. It is an eighteenth-century mill conversion, and we have recently installed a whole new heating system which came via a local trader. This was the best part of £7k.</p> <p>All of the income from letting the property goes back into the business - upkeep and maintenance. This labour-intensive business employs local people to change over and maintain the property.</p>	
<b>Personal impact</b>		
<b>Turnover</b>	2019 £14'755 Less costs £5'394	2021 £14'642 Less Costs £5'418
<b>Incremental cost of Council Tax at cost</b>	Currently £1975	
<b>Incremental cost of Council Tax at 200%</b>	Double - £3950	
<b>Incremental cost of Council Tax at 300%</b>	Treble - £5925	
<b>Planning Permission restrictions</b>		
<b>Any Other Comments</b>	As you can see, the business will be untenable with the rise in council tax and the business rates threshold will make it unviable.	

<b>Business Details</b>	Holiday Let
<b>Short Description</b>	one small apartment near the sea, been trading for about 12 years.
<b>Impact on the business of 182 threshold</b>	We would fail to reach a threshold of 182 days, as even in the best year we have ever had, we only reached 168

	days. Therefore, we would be regarded as a holiday home and subject to Council Tax.
<b>Personal impact</b>	The profit made from this small business is already marginal. Were we to be forced to pay Council Tax at the standard rate, it may be possible to make a small profit (of less than £1000) in a good year; though any upgrades to the property may not be viable. If we had to pay council Tax at 200 or more percent, we would become loss making immediately, which would trigger the sale of the property. The alternative would be to raise the price to the holidaymaker, but this would then make us uncompetitive with other areas of the UK.
<b>Turnover</b>	2019 £11.5K and 2021 - £14.1K
<b>Incremental cost of Council Tax at cost</b>	£1250
<b>Incremental cost of Council Tax at 200%</b>	£2500
<b>Incremental cost of Council Tax at 300%</b>	£3750
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	One large holiday cottage
<b>Short Description</b>	been trading for 14 years
<b>Impact on the business of 182 threshold</b>	<p>As a large property (sleeps 12 ) The 182 day threshold is unthinkable as a whole week is only sold in school holiday weeks. My guests are predominantly 3 generation get togethers. Frequently paid for by the grand parents, who treat their children and grand children.</p> <p>These groups also bring along their dogs as part of the family.</p> <p>We have a ground floor bedroom, all rooms are ensuite and so this favours mobility impaired guests, but also those with mental impairment, autism, downs syndrome etc who are not suited to the holiday campsites, hotels, caravan parks.....and suchlike. There is a huge sense of relief to families when those children particularly mental issues are allowed to "express" themselves without upsetting other guests in a campsite or the beach/towns/countryside.</p> <p>Our cottage with all the space becomes their home for the week and everybody can just relax. We have never achieved 182 days let because of its size and location, to book a 3 generation family holiday is a well pre planned event and does not lend itself to last minute bookings, to quickly fill up a couple of days at the last minute.</p>
<b>Personal impact</b>	Personally this property will cease to be my 6th generation family farmhouse as it was renovated from being occupied by cattle in 2006 with a large bank loan and opened in 2008. It has never been self supporting financially with mortgage repayments of £1550/month,

	elec and elec air source heat pump, insurance for SC is up to £800pa, wages, high maintenance costs as it's an old lime mortar property, advertising etc. VAT has to be paid in on all lettings, a considerable hit on it's own. Some inputs are vat reclaimable but does get anywhere an equitable level with the output tax.
<b>Turnover</b>	Turnover in 2019 was £20k as an issue with website inbox resulted in enquiries not being delivered. Turnover 2021, £24500 excludes some 2020 reservations rolled into 2021 due to covid. Both above inclusive of vat.  But much needed for 2022 bookings of £35k to date.
<b>Incremental cost of Council Tax at cost</b>	£3208
<b>Incremental cost of Council Tax at 200%</b>	£6416
<b>Incremental cost of Council Tax at 300%</b>	£9624
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Two holiday houses, village location of Abersoch
<b>Short Description</b>	professionally holiday let for 14 years.
<b>Impact on the business of 182 threshold</b>	The target is totally unachievable in a rural seasonal area so the impact is absolutely devastating, we are committed to the holiday lettings business as it is our only source of income and therefore will have to make significant cost savings to survive. Obviously these cost savings will have to come from expenditure that would otherwise go to the local community. Also an additional and very current example is that we had previously planned building works and renovations to further improve the business, these were at an advanced stage and cost estimates are approximately £150k this is now on hold to to uncertainty of the future financial viability. We believe in working with the local community completely, this investment would also have gone direct into the local economy. Plus other ongoing maintenance and changeover costs of approx £10 pa, we are now planning to do these ourselves to be able to maintain our business.
<b>Personal impact</b>	It feel as if we are being racially abused as it appears to be blocking anyone that is not a native speaker - I have lived in North Wales all of my life!
<b>Turnover</b>	turnover was in 2019 and 2021 £47k / £51k
<b>Incremental cost of Council Tax at cost</b>	£9k to £10k
<b>Incremental cost of Council Tax at 200%</b>	£12k to £14k

<b>Incremental cost of Council Tax at 300%</b>	Cannot even think about it!!
<b>Planning Permission restrictions</b>	Possible, but not fully known at this stage.
<b>Any Other Comments</b>	

<b>Name</b>	
<b>Business Details</b>	Coastal location bungalow
<b>Short Description</b>	trading for over ten years with Quality Cottages as agent . Sleeps 7 graded 5star by Visit Wales
<b>Impact on the business of 182 threshold</b>	<p>Always exceeded HMRC threshold to qualify as business . In over 10 years with QC never hit 26 weeks occupancy . 22 weeks was a good year with QC.</p> <p>Something needs be done separate legit holidays lets from the casual ones. My husband is from Pembs and we have family and friends around us at our property, we do acknowledge affordable housing problem .</p> <p>Short breaks been busy throughout winter and now full til mid sept save 3 weeks . But these are DAYS not weeks Counting in weeks instead of days doesnt take account of the shift in booking trends driven by AIRBNB</p> <p>I pay local cleaner £140 each clean and local handyman gets about £4k pa from me. The Info Pack send to guests introduces them to the dining and leisure activities on offer here . I do encourage shopping locally and independently.</p> <p>Our cottage is integral to the tourism economy in Little Haven and supports local tourism jobs.</p> <p>Retaining 5 star grading is important to me. I want to offer a quality product and for guests to love Little Haven as much as I do. With this additional tax burden it will not be viable to maintain the 5star standard. I will need to make savings and the quality of the product I now provide will decline. Passing costs on to guests wouldn't have been possible even without the current cost of living crisis.</p> <p>May rent to family and friends instead and to offset some of costs which will result in cleaner and handyman losing income source. Counting in weeks , not days doesnt take account of shift in booking trends driven by the likes of Airbnb</p>
<b>Personal impact</b>	It may be uneconomic to continue. We only rent because empty homes don't help life of village . Our guests tend to dine out a few nights a week in the village. More than we would if we were residents of village! We will certainly be trading at loss as I can't see guests being able to absorb costs during a recession. They will look for other staycation options where owners don't have this overhead . We will be less competitive than other parts of UK. This will have detrimental affect on local economy
<b>Turnover</b>	Qualified for rate relief
<b>Incremental cost of Council Tax at cost</b>	Guess in band F at nearly £1600



	Although we qualified for Business rates I paid Council tax for years as I felt our cottage and its guests did get some value from PCC's services. I only applied for Business rates when the uplift in Council Tax on second homes was on the horizon.
<b>Incremental cost of Council Tax at 200%</b>	1600 plus 3200
<b>Incremental cost of Council Tax at 300%</b>	1600 plus 4800
<b>Planning Permission restrictions</b>	No able to rent all year round- which is what Ive always tried to do
<b>Any Other Comments</b>	

<b>Business Details</b>	We own and run a small 2 bedroom self-catering holiday cottage attached to our main dwelling in Manorbier Newton, Pembrokeshire
<b>Short Description</b>	We are in a rural location close to the coast and about 5 miles from Tenby. We have been trading for 12 years.
<b>Impact on the business of 182 threshold</b>	The impact of a threshold set too high, such as 182 days would place an unnecessarily high burden on all such owners, who from time to time suffer from the vagaries of the holiday market. I think we would all agree that the COVID issue and its aftermath has upset normal bookings. In other words through normal market fluctuations we can often see occupation dip well below 182 days even though we are available for booking 365 days a year. Not being able to achieve a demonstrable 182 days booking a year would ultimately lead our business to close or change to long term let (assuming council grant permission for change of use). Conversion to long term let would require considerable additional investment.
<b>Personal impact</b>	If a 182 day limit were imposed and not met, for no other reason than low market take up, the new categorisation and resultant tax paid would suddenly change the business model. Rather counter intuitively this would mean that the less we take from the business the more likely we would succumb to an unsustainable tax burden. Because our property is joint commercial/residential we would either have to sell or change status and stop trading, which in turn would not be good for us, lead to reduced tax into gov. and ultimately a reduction in local business due to less holiday accommodation more generally.
<b>Turnover</b>	Turn over in 2019 was circa £8600 from 17 weeks, 2021 circa £4700 from 8.5 weeks.
<b>Incremental cost of Council Tax at cost</b>	1100
<b>Incremental cost of Council Tax at 200%</b>	2200
<b>Incremental cost of Council Tax at 300%</b>	3300

<b>Planning Permission restrictions</b>	Yes, clearly having business rates applied requires proof of being a “self contained holiday let” and as such restricts from long term letting, which is something quite different.
<b>Any Other Comments</b>	

<b>Business Details</b>	3 bedroom house by the coast in New Quay.
<b>Short Description</b>	We have been trading for 5 years letting out the house for holiday rentals between March and September. The house does not currently have sufficient heating to enable us to let it in the winter months however, we were hoping to make enough rental income in the next couple of years to install an efficient heating system to lengthen our rental period.
<b>Impact on the business of 182 threshold</b>	Should the proposed 182 threshold come into force, we would have to close our rental business as there is no possibility of reaching that level of rentals in the New Quay area. West Wales is not a year-round holiday destination which is evidenced by several local retail businesses closing between October half term and the start of the Easter holidays as there is insufficient tourist trade. Most local holiday lets that are available for rental all year round only just about manage to meet the HMRC letting criteria of 105 days. As we would be unable to meet the rental criteria, we would have to sell our property as the business would be unviable if we have to pay the level of council tax proposed as below.
<b>Personal impact</b>	Like most other holiday rental businesses, we have spent a lot of money in the local economy employing local tradesmen to carry out building/maintenance works on the property and the building stock of the village is kept up to a high standard by this means. Should we sell, the house is unlikely to be bought by a local person as there is insufficient employment in the area and there is a requirement for local affordable housing to be built.
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	Amount to be paid of not on SBBR - £4,298
<b>Incremental cost of Council Tax at 200%</b>	Amount at 200% - £6,446
<b>Incremental cost of Council Tax at 300%</b>	Amount at 300% - £8,596
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Self Contained Holiday let attached to our home and part of our home when not let in Haverfordwest
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<b>Short Description</b>	Contains one double bedroom, large living room, own kitchen and toilet/bath & shower room. Also has own access door to our car parking area.
<b>Impact on the business of 182 threshold</b>	We were only able to start trading from the end of July 2020 due to covid restrictions, paying council tax at band F. We were to review this during the current year now most restrictions have been lifted and we could assess the impact that the reintroduction of foreign travel would have on the staycation market. Our bookings during covid with restrictions were good, so we felt we could easily qualify for the current (140/70) business rate exemption limit. Although it is early in the year our bookings for 2022 appear a little down on the previous year with current 87 days booked so far, so still some way to go to reach the new levels, so will remain on the current band F council tax rather than apply for the business rate.
<b>Personal impact</b>	If we were able to pay council tax and qualify for the non domestic business rate based on current limits, we would be on band E so paying £1929.41 (Pembrokeshire council tax) as apposed to the current band F rate which is £2280.21. It is likely we would have qualified easily under current rates and saved £350 per year or £29 per month. This would of allowed us to not consider increasing our prices for 2023 to account for the worldwide increase in energy prices which we may now have to review going forward. We are in this business because we love giving people a good experience when they come to this beautiful part of the world. Profit is not our main driver, but we have to remain viable.
<b>Turnover</b>	We moved to Pembrokeshire in August 2019 so were not trading then, but getting ready to for 2020. Therefore our turnover was a deficit for that year. In 2020/2021 we were available to let for 217 days and actually let for 153 with a turnover of £12,115. In 2021/22 just closing, we have been available to let for 269 days and let for 179 with a turnover of £14,190.
<b>Incremental cost of Council Tax at cost</b>	we meet the current rates for business rate exemption in the two years of trading we have had under covid restrictions, but would fail under the new proposed business rate exemption limits. We will pay £2280.21 (band F) this year 2022 by not benefiting from SBRR. Under current limits for SBRR we would have paid £1929.41, a loss of £350.80 for the year.
<b>Incremental cost of Council Tax at 200%</b>	£4560.42
<b>Incremental cost of Council Tax at 300%</b>	£6840.63
<b>Planning Permission restrictions</b>	We were able to provide a 3 month medical student placement let during covid restrictions in March to May 2021, but only provide short term holiday lettings as a rule, but are not restricted by any planning permissions.
<b>Any Other Comments</b>	

<b>Business Details</b>	We own an apartment at Solva, Pembrokeshire.
<b>Short Description</b>	The apartment is part of an historic building. It has two bedrooms, is in a coastal location, and has been trading for 12 years. It is not limited by any planning condition and so is available for let 365 days of the year.
<b>Impact on the business of 182 threshold</b>	Our apartment's occupancy rate has usually been between 120 -165 nights, as a result of highly professional marketing by our agent. The letting season in Pembrokeshire is relatively short – reaching 183 nights let would be difficult for us. Our turnover in the last four years has averaged about £11,500 per annum. Over the past 8 years, our average profit has been about £3,000 per annum.. Should we be eligible for normal Council Tax, this would drop to a profit of £1800 per annum. Should we be eligible for enhanced rates at 200% Council Tax, this would drop to a profit of £600 per annum. Should we be eligible enhanced rates at 300% Council Tax, this would result in a loss of approximately £600 per annum. The business would not then be viable.
<b>Personal impact</b>	<p>We are one of nine families who have invested in the restoration and management of a large historic house and garden. The nine units created by the initial renovation of the house are all available for holiday let. Without the investment by these nine families, all of whom are Welsh or resident in Wales, it is likely that this building, which has played an important part of the history of Pembrokeshire would have fallen into disrepair. Recently, we have joined other local landowners in changing our land management as part of a National Trust inspired 're-wilding' project.</p> <p>Like the other owners, we feel a deep commitment to the site and have felt that we are making a significant contribution not just to the maintenance of an historic landscape, but to the local economy. We all employ local cleaners, pay fees to local letting agencies, give local contracts for maintenance, gardening, plumbing and electrical work; not to mention the impact on the local economy of our visitors – 28 bed spaces in total. This contribution to the local economy would cease if we were all to decide that our investment was no longer financially viable. This would be a great disappointment and we hope that Welsh Government will take all these factors into account when making its final decision.</p>
<b>Turnover</b>	Turnover in financial year 2018-19 was £9527. Turnover in financial year 2020-21 was £9834.
<b>Incremental cost of Council Tax at cost</b>	Council tax Band D approx £1200

<b>Incremental cost of Council Tax at 200%</b>	Council tax Band D 200% approx £2400
<b>Incremental cost of Council Tax at 300%</b>	Council tax Band D 300% approx £3600
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	a cottage in Talybont, Gwynedd
<b>Short Description</b>	I have one holiday cottage for 2 people attached to my home that has been built for and trading as a furnished holiday let since the late 1980s and under my stewardship since 2010 when my son bought the property for me to live in and manage.
<b>Impact on the business of 182 threshold</b>	<p>If the 182 nights let is introduced it will be a constant struggle to achieve as looking back at my history here the areas appeal can be variable year on year with many factors coming in to play for example the places eateries/attractions that remain open during the low seasons weather etc and if I take this year there has been a noticeable slump in bookings due to the ability of folks to go overseas for guaranteed weather, the concerns about cost of living and home heating and rising fuel costs and media negativity regarding Welsh holiday homes etc</p> <p>If my business becomes unviable it will severely effect not only myself but the many people locally who are involved in maintaining the standards required. At age 77 living alone I rely on gardener cleaner handyman and laundry to quote just a few examples aside from plumbers painters etc and should I not meet the 182 days and have to shut my business all these would be affected. This of course does not include all the businesses locally used by my guests.</p>
<b>Personal impact</b>	<p>The impact both financially and personally for myself would be devastating should I not meet the 182 nights booked as it would become unviable to operate due to the increased costs reducing prices to try and achieve same would be ridiculous as any profit is negligible in low season.</p> <p>I retired in 2010 aged 65 single on reduced state pension as when married I had moved to South Africa with my then husband and lost 20 years of entitlement and also because of this move as well I have a very small private pension certainly not enough to live on.</p> <p>I was given the opportunity via family to help support myself by running this holiday let that would not only contribute a little for my efforts but give me something to do and keep me in touch with people thereby avoiding loneliness....</p> <p>12 years on after achieving many of the goals I had set myself and ultimately getting 7 out of 10 in the world on trip advisor in 2018 I had hoped that I could continue for</p>

	<p>many years just relying more each year on folks to help thereby putting money back in to the local economy. This March I had a bad fall and was in hospital for 10 days and looking at a 3 month recovery, most guests are returnees now so I am still taking some bookings but will probably fall at the first hurdle should this 182 requirement be enforced.</p> <p>The impact would be that myself and all the locals that help at the moment would lose income and I for one would have to research pension credit type help etc along with losing my independence and feel my mental health would also suffer without the daily stimulus.</p>
<b>Turnover</b>	<p>2019 £15272 2021 £12100 My year is July through June so last figure above still reflects covid hit.</p>
<b>Incremental cost of Council Tax at cost</b>	Business rated amount is £ 909 for the little cottage
<b>Incremental cost of Council Tax at 200%</b>	twice £1818
<b>Incremental cost of Council Tax at 300%</b>	3 times £2727 along with all other associated costs sadly unviable not sure on normal rates what it would be and due to recent injury can't research.
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Two holiday cottages, 5 star rating – a Cottage and a Farmhouse in Solva, Pembrokeshire.
<b>Short Description</b>	See <a href="http://www.westwalesholidaycottages.co.uk">www.westwalesholidaycottages.co.uk</a> for details. Trading nine years.
<b>Impact on the business of 182 threshold</b>	Our two business cottages (which we never stay in ourselves) are available 365 a year. Even with our best endeavours and 100 percent positive feedback from our guests we are unlikely to meet the proposed threshold of bookings. This is evidenced by renting out for some 20 weeks per house in 2019/20 and for some 17 weeks in 2020/21. The extra costs to the business will be catastrophic and lead to closure (with substantial detrimental effect upon local employment, and to the wider economy in Pembrokeshire losing two sets of holiday guests accommodating 7 people in each house).
<b>Personal impact</b>	<p>As a retired couple the current proposals are very stressful and causing a great deal of anxiety and uncertainty.</p> <p>In addition to the two business cottages we have a holiday home in Solva, which has been in the family for some 50 years (which we do not rent out). We built the business cottages from scratch and have invested about 1 million pounds. We will have to sell up and invest our capital in another part of the UK where we will be made welcome. This may be the desired result of Welsh Government but is likely to lead to the long term decline</p>

	in the tourist industry in Pembrokeshire as investors leave etc.
<b>Turnover</b>	2019/20- £48,400    2020/21-£47,900
<b>Incremental cost of Council Tax at cost</b>	Approx £9,800
<b>Incremental cost of Council Tax at 200%</b>	Approx £19,600
<b>Incremental cost of Council Tax at 300%</b>	Approx £29,400
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Self catered holiday let in Pembrokeshire coastal town
<b>Short Description</b>	1 holiday apartment, been trading for 15years
<b>Impact on the business of 182 threshold</b>	The impact on my business of the 182 day threshold would be result in the business ceasing to trade. This property is in a popular tourist attraction and is available to let 365 days of the year. This has been the case since I purchased the property 15 years ago. Despite this consistent availability, there has not been one year when the apartment would have actually been let for 182days or more. I feel this is due to the very seasonal nature of the tourist trade in coastal Wales.
<b>Personal impact</b>	The impact on me personally would be devastating. I have worked hard to develop and invest in improving the property. I employ local tradespeople and a cleaner. The business is labour intensive and currently run on a small profit. Following the introduction of the changes to qualification for business rates, I have no option but to sell my property. The property does not generate enough income to cover the proposed council tax changes.
<b>Turnover</b>	2019/20 tax year turnover £8872 2021/22 tax year estimated turnover £11000
<b>Incremental cost of Council Tax at cost</b>	If I was on Council tax I would pay £2247
<b>Incremental cost of Council Tax at 200%</b>	200% council tax premium would total £6741
<b>Incremental cost of Council Tax at 300%</b>	300% council tax would total £8988
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	1 property has been inherited from my late parents who lived at this address since 1966. It was put into a Trust in 2006 for my sister, myself and 3 grandchildren. My husband and I have lived next door in a semi detached cottage since 1979, we have both worked up until retirement in Wales, myself as an NHS nurse and Chris for The Welsh Assembly Government and locally
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	privately established specialised science labs. employing local people.
<b>Short Description</b>	<p>The property was in some disrepair when my father went into a Care home in 2018.</p> <p>So I spent my pension on repair and maintenance work to upgrade and bring the property up to living standard and to prevent the property from falling into wrack and ruin. We decided to let out the property for seasonal holiday letting in order to repay the money spent and to supplement my pension in order to live reasonably comfortably.</p> <p>Based on last years income and tax rate from letting out the property It would take approximately 3 -4 more years to repay the loans.</p> <p>It is a semi-detached rural old farmhouse consisting of 4 double bedrooms and 3 bathrooms. Our first letting was 03.07.2021 and the house was booked for 122 nights in 2021 through West wales holiday cottages.</p> <p>The booking response for staycations was enhanced by the Covid situation when flights abroad were restricted. So far we have only 5 weeks booked (35 nights) for this year.</p>
<b>Impact on the business of 182 threshold</b>	<p>Guaranteeing a minimum of 182 booked nights in one year is therefore not realistic.</p> <p>The holiday season in Pembrokeshire is very popular but very limited in time span.</p> <p>The summer school vacation, Easter, summer half term and possibly Autumn half-term are the key times for bookings. This time amounts to approx. 10 weeks (70 nights).</p> <p>It is clear to speculate that reaching a minimum of 182 nights will be almost impossible for a simple property like Bayvil.</p>
<b>Personal impact</b>	
<b>Turnover</b>	
<b>Incremental cost of Council Tax at cost</b>	Council Tax for Bayvil is rated at £2,262.03
<b>Incremental cost of Council Tax at 200%</b>	Council Tax at 200% would be £4,524.06
<b>Incremental cost of Council Tax at 300%</b>	Council Tax at 300% would be £6,786.09
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>Therefore the previous criteria and requirements for taxing local properties as seasonal holiday lets is not only a much fairer system but a realistic one.</p> <p>Also please consider how properties let out for holiday accommodation in Pembrokeshire and beyond, encourage and support the local shops and venues of interest. Tourists spend their money locally and keep the</p>



	tourism industry afloat. Without these tourists, if we are unable to provide holiday accommodation the local community and economy will suffer.
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<b>Business Details</b>	Self Catering Furnished Holiday Letting in Tegryn, Pembrokeshire.
<b>Short Description</b>	<p>ONE property -- grade 11 listed, Has Visit Wales 4 Star Grading.</p> <p>Secluded traditional rural cottage on the slope of Frenni Fach in the Preseli Mountains. 1 bedroom sleeping 2 people. From the mid 1970s to 2004 it was a furnished holiday let, let through 'Pembrokeshire Coast and Country Holidays'. From 2005 to 2009 it was rented out to a local couple [with legal tenancy agreements]. The tenants presented us with a number of problems; including damage to the property. Their eviction was long drawn -out and expensive and the property had to be completely and extensively refurbished; this work was completed for the property to return to being a 'Self Catering Furnished Holiday' letting for the 2018 season. The property has never been used 'privately' by myself or my family.</p> <p>Our proeprty is 'listed' so careful choice of local skilled crafts men &amp; trades-people was made for the renovation and we worked with a local architect on its refurbishment--the costs of renewal and maintaining a listed property are high. I employ local people for all work required and most materials needed are sourced locally. Because of Covid - 2021 was the 3rd season [-after renovation] --for holiday letting.</p>
<b>Impact on the business of 182 threshold</b>	<p>It is designed for a couple in a niche market; ie 2 people who want to get away from modern life and are seeking seclusion in natural surroundings. My visitors are encouraged to shop locally. They are provided with information on the history of the cottage, its setting and surroundings. The maps and books illustrate the history and beauty of the Preseli Mountains and West Wales and the culture, language and local attractions.</p> <p>As the cottage is small and retains its historic layout, it can't be adapted for disabled people. The 182 day threshold may be difficult to achieve, even though the cottage will be available for more than the 252 days required. The number of bookings are influenced by the large choice of local holiday cottages advertised by the many agencies and websites. I tried a number of holiday cottage agencies but West Wales Holiday Cottages get me the most bookings so I now only use them. I find it too confusing and complicated to use more than one agency. I have no personal expertise in marketing or IT to be able to further promote the cottage to ensure an achievement of 182 days. Some allowances need to be made for the fact that seaside village cottages close to pubs,</p>

	restaurants and entertainment tend to be more popular than the seclusion offered here.
<b>Personal impact</b>	<p>I am Ceredigion born and bred and have owned our cottage for 60 years. The costs of maintaining and running this historic grade 11 listed cottage are high. Its first renovation in the early 1970s was enabled through a Farm Diversification Grant.</p> <p>I am a pensioner. The returns from this cottage form part of my income --in addition to paying its high running costs. Reverting to council tax at a premium of 50% or more would be unaffordable for me [I also need to recover the refurbishment costs]. If it weren't for my late husband and myself, this historic, traditional grade 11 listed cottage wouldn't be in existence. We have put our souls into looking after, conserving and protecting it for 60 years! This is a genuine luxury furnished holiday letting which helps conserve its' very existence, attracts visitors to share the beauty and magic of West Wales and helps to develop the local economy.</p>
<b>Turnover</b>	<p>Turnover for 2019 was £6,510.00p</p> <p>Turnover for 2021 was £11,418.00p</p>
<b>Incremental cost of Council Tax at cost</b>	Council Tax (including current 50% premium) would presently be- approximately- £2178.00p
<b>Incremental cost of Council Tax at 200%</b>	At 200% premium council tax would be- a 'guesstimate' of approximately -£3960
<b>Incremental cost of Council Tax at 300%</b>	At 300% premium council tax would be -a 'guesstimate' of approximately- £5280
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	1 property, sea side location in Newport Pembrokeshire.
<b>Short Description</b>	Was family home for 35 years until disability and the removal of permission to park on neighbour's car park enforced move.
<b>Impact on the business of 182 threshold</b>	<p>The house is available to let for 320 days per year but has never been booked for more than approximately 100 days per year, despite competitive pricing. The implementation of 182 days actual letting, would make the business unsustainable.</p> <p>Personally, the income from the holiday let supplements my pension, as I was medically retired in 2019. One of my daughters is working abroad for a non-profit organisation, and our hope is that she and her family will be able return to Newport with her husband and children in around 5 years, and it would revert to a family home. The children would be able to attend the local schools and speak Welsh, which is very important to all of us.</p>
<b>Personal impact</b>	The changes would mean I would not be able to retain the house for our family. The current value of the property means it is likely to be unaffordable for many local families, and would probably be bought as a

	retirement home or a second home for people able to afford the increase in Council tax.
<b>Turnover</b>	The turnover for the last three years has been between £12,000 and £18,000.
<b>Incremental cost of Council Tax at cost</b>	The rateable value is £4800. The council tax would be £2568, but I have small business rate relief
<b>Incremental cost of Council Tax at 200%</b>	An increase to 200% would mean £5168
<b>Incremental cost of Council Tax at 300%</b>	and to 300% would be £7704
<b>Planning Permission restrictions</b>	The property is restricted to lets of no more than 28 days.
<b>Any Other Comments</b>	The turnover is not sufficient for this once fixed costs and maintenance are accounted for. I hope that this information will sympathetically inform the decision making.

<b>Business Details</b>	a holiday let property in Cwm Yr Eglwys, in Penbrokeshire.
<b>Short Description</b>	<p>a two flat property occupying a site used as a holiday cottage since the second world war, we have been fortunate enough to own the property for the last ten years, my wife has been visiting Cwm Yr Eglwys regularly for about 40 years and we have strong ties to the community. Since at least the 1950's the property has been run as a holiday rental property and when we took ownership, we were keen to continue this legacy as some of our guests have been visiting since before we owned it. As part of the upkeep we utilise a local caretaker, change over cleaning company, electrician, gardener and window cleaner.</p> <p>We retain the small upstairs flat for personal use and as such understand it is a privilege, and that there is the requirement to pay council tax at an increased rate. The larger downstairs flat however is reserved solely for short term holiday rental as it always has been and because of this, this flat has been subject to small business rates relief.</p> <p>We have our property available to rent to holiday makers all year round (excepting periods of maintenance - we have just spent the winter fully refurbishing) and we are obviously keen for it to be used as much as possible.</p>
<b>Impact on the business of 182 threshold</b>	Since the property has good beach access, we appreciate many of our bookings are for families with children and as such the majority our bookings are focussed around generally regarded holiday periods. Taking into account seasonal variations and school holidays we can normally expect bookings throughout Easter, Summer, half terms and weather depending, autumn half term. This normally equates to about 13 weeks in a year. We will also hopefully increase this with smaller guest bookings of

	<p>couples at reduced rates outside of the holiday period. Generally a good year will see 20 weeks of bookings. Sadly, even this falls short of the proposed 182 day threshold.</p> <p>We do not run it as an income stream, most of the profits are ploughed into upkeep (a recent £35k refurbishment for example) and most recently the vastly increased costs of energy supply. If we are faced with increased costs we would have no option than to pass these on to the paying guests. If this were the case I would sadly expect guest numbers to drop significantly. I imagine this would be the case for many privately owned properties and the income generated for the surrounding pubs, restaurants and amenities would similarly fall away.</p>
<b>Personal impact</b>	
<b>Turnover</b>	<p>We have an estimated annual turnover of £10 to 14k and as I said before much of this spent on running costs and any excess is kept in reserve to allow upgrading and modernising the facilities. When funds allow and we are able to carry out works, we are mindful to ensure we use local companies or tradespeople wherever possible. If there was a removal of the small business rates relief we would be faced with an additional bill of just over £1900.00</p>
<b>Incremental cost of Council Tax at cost</b>	<p>if we were obliged to pay council tax it would be in the region of £3860 (with the current 100% excess for second homes</p>
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	<p>rising to a possible £5700 if this was increased further</p>
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>This would make it financially unviable to continue being able to rent what has, in all its recent history been a holiday rental property, with the associated financial losses to local businesses that would result from this. The property and local services (refuse collection in particular) would not easily support long term rental or permanent residents (we currently have to pay separately for our refuse collection as we have been told the waste lorry is unable to negotiate the narrow and steep lane up which we are located). This is one of the many quirks of the geographic location that we are willing and happy to manage on behalf of guests however they would constitute more of an issue for permanent residents.</p> <p>I hope you appreciate our circumstances and the benefits that a thriving tourist economy brings to this small part of Pembrokeshire and to Wales as a whole.</p>

<b>Business Details</b>	3 Bedroom detached cottage , in a coastal, rural location in Aberaeron, Ceredigion.
<b>Short Description</b>	Have been trading since July 2021.
<b>Impact on the business of 182 threshold</b>	Unlikely to achieve 182 day threshold and to have cottage as my main income as I had planned. Very little if any profit after rising bills especially oil prices as cottage heated by oil as no gas in area , council tax and holiday letting agent commission as well as maintenance and house insurance.
<b>Personal impact</b>	Heart breaking to think all the hard work I have done to the cottage over the last couple of years might now be a waste of time and money and that the business I have worked so hard to achieve will possibly be not viable . I have followed all the rules to gain the business rates and to do things properly . Running a holiday let is going to be hard enough with rising costs without raising the occupancy to a totally unrealistic number of days for most owners. We don`t know how the rise in bills is going to affect future bookings in the tourism sector . i don`t know of any other business being told that if they don`t have a certain number of customers they will be treated like this . If this rise in occupancy rise does happen the chances, are I would be forced to sell as many others would have to . Tourism should be encouraged not penalised !
<b>Turnover</b>	£12,500 from July 2021-January 2022 before bills
<b>Incremental cost of Council Tax at cost</b>	2141.20 Council tax per annum
<b>Incremental cost of Council Tax at 200%</b>	4281.40 @ 200%
<b>Incremental cost of Council Tax at 300%</b>	6421,60 @ 300%
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Our property is a traditional mid 19th century detached cottage in rural Carmarthenshire. Members of Premier Cottages.
<b>Short Description</b>	The cottage sleeps four in two bedrooms. We bought it (already a FHL) in 2017, and have been trading ourselves for almost 5 years. We have just had our 3rd Visit Wales assessment, retaining our 5 star grade. The assessor commented in his report that it was one of the best self-catering properties he had assessed in recent years.
<b>Impact on the business of 182 threshold</b>	It is open for booking 365 days a year, except when we need to close for maintenance /repairs. 2021-22 was our busiest year to date with 147 days let. This was exceptional due to bookings moved from 2020 and the post-pandemic staycation boom. 182 days let will almost certainly be unachievable for us. Our location is rural, not coastal. In a normal year we get very few bookings from October to March when the weather is often poor and

	<p>many of the attractions and amenities (e.g. restaurants) that people require are either open weekends only or closed altogether. Soaring petrol and other costs are taking their toll on public confidence and bookings are already down by around 30% this year.</p> <p>If we lose our entitlement to SBRR and have to pay Council Tax x 3 it will increase our costs by around £4,500 per year and render our small business unviable. Currently we provide an income for 3 older people (gardening and cleaning). We use local traders, builders, electricians, plumbers, laundry. Even our toiletries and the food items in our welcome pack are locally sourced. We showcase and promote local arts and crafts. We bring people into the area who spend money here. All this will be lost.</p>
<b>Personal impact</b>	<p>The property is our second home AND a relatively successful FHL, given the limitations of the location. We are Welsh, and hope to retire there in 5 years' time. In the meantime, we have worked extremely hard to maintain the property to the highest possible standard. We have poured love and care into the house and garden and built excellent relationships with our neighbours. We take great pleasure from sharing the house and all the wonderful things about our area with our guests. We are saddened by the implication that we are exploiting local people and resources when we do our utmost to do the opposite.</p> <p>We would be devastated to be forced into selling our cottage but in that event we would seek to maximise the return on our investment. In all likelihood, our cottage would be bought - not by a local family who don't want a small, 175 year old house that costs a fortune to heat - but by someone from Southern England who can afford to pay the Council Tax and will leave it empty for 75% of the year. Where is the sense in that?!</p>
<b>Turnover</b>	<p>Turnover in 2018-19 (April-March) was £12,778</p> <p>Turnover in 2019-20 was £11,950</p> <p>Turnover in 2020 -21 was £9,414 (excluding Covid grants)</p>
<b>Incremental cost of Council Tax at cost</b>	<p>If we were not on business rates (and benefiting from SBRR) but on Council Tax we would be paying £1517.81 (based on a neighbour's rate @ 100%).</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>@ 200% we would be paying £3,035.62</p>
<b>Incremental cost of Council Tax at 300%</b>	<p>@ 300% we would be paying £4,553.43</p>
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	<p>A final word - the impact on our local economy. Have you been to Newcastle Emlyn lately? There is tumbleweed blowing down the high street. Cafes, shops and restaurants have closed. The area needs a thriving tourist industry if it is to have any chance of economic recovery</p>

	and health. Most of the FHLs in Carmarthenshire are self catering cottages. There are very few hotels. If many FHL owners are forced to sell, there will be less tourists even in high season, impacting further on a local economy already hard hit by Covid and Brexit.
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<b>Business Details</b>	I co-own a holiday cottage with my 3 siblings. The cottage is a small house that has been in the family since 1953 in Moylegrove.
<b>Short Description</b>	We have been letting the cottage since roughly 1987. It stands alone in a rural location. It has a septic tank with no mains drainage
<b>Impact on the business of 182 threshold</b>	the probability is that we will not be able to continue to keep the cottage. We already find it difficult to let the property for the 170 days. The property has poor insulation and is in an exposed position so we do not let it in the winter for this reason.
<b>Personal impact</b>	The impact on me personally would be great sadness as it is likely that we would have to sell the cottage. The cottage needs to be self-funding so that we can keep it. During 2020 we had to sink our savings into keeping it going. We cannot afford to keep it without it generating an income. We would be challenged to let it out for the 182 days and prior to changing to small business rates the Council tax was a huge burden each year. This is a house that was left to us by my grandmother. I have been coming to the cottage since 1964. It is our families home . We would have to sell it. The house is remote but in a spectacular position so would not sell as any type of low cost housing, more likely to be bought to develop.
<b>Turnover</b>	2019- 2020 our turnover was £4962. In 2020- 2021 £9592.We have run at a loss both years
<b>Incremental cost of Council Tax at cost</b>	The last council tax we paid was £ 2476
<b>Incremental cost of Council Tax at 200%</b>	£4952
<b>Incremental cost of Council Tax at 300%</b>	£7428
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	a one bedroom apartment within a renovated historic house and grounds along with 8 other dwellings within Llanunwas, Solva, Haverfordwest, Pembrokeshire.
<b>Short Description</b>	We purchased our apartment following the completion of extensive renovations in September 2009

<b>Impact on the business of 182 threshold</b>	<p>We are one of nine families who have invested in the restoration and management of a large historic house and garden. The nine units created by the initial renovation of the house are all available for holiday let. Without the investment by these nine families, most of whom are Welsh or resident in Wales, it is likely that this building, which has played an important part of the history of Pembrokeshire would have fallen into disrepair. Recently, we have joined other local landowners in changing our land management as part of a National Trust inspired 're-wilding' project. Like the other owners, we feel a deep commitment to the site and have felt that we are making a significant contribution not just to the maintenance of an historic landscape, but to the local economy. We all employ local cleaners, pay fees to local letting agencies, give local contracts for maintenance, gardening, plumbing and electrical work; not to mention the contribution to the local economy of our visitors – 28 bed spaces in total. This contribution to the local economy would cease if we were all to decide that our investment was no longer financially viable. This would be a great disappointment and we hope that Welsh Government will take all these factors into account when making its final decision.</p>
<b>Personal impact</b>	<p>Should the decision be made to increase the letting threshold to 182 days, we may have to seriously consider our ownership of the property. I consider that we are in volatile times and certainly would not be able to confidently say that we would meet the new threshold, or indeed want to even try. Both ourselves and our immediate family all enjoy our time in Llanunwas, time that would not be included towards the 182 days. We may therefore, have to consider making our family time also available to maximise the potential letting availability. This, as well as the financial implications, may well force us into considering our ownership of our apartment.</p>
<b>Turnover</b>	<p>Our turnover for 2019 was £7,007 Via a local agency (Coastal Cottages) Our turnover for 2021 was £10,203</p>
<b>Incremental cost of Council Tax at cost</b>	<p>Our rateable value for 2022 is £1177.00</p>
<b>Incremental cost of Council Tax at 200%</b>	<p>Our council tax @ 200% would be £2,354</p>
<b>Incremental cost of Council Tax at 300%</b>	<p>Our council tax @ 300% would be £3,531</p>
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	



<b>Business Details</b>	We have owned a small 3 star holiday cottage (sleeps 4) in North Pembrokeshire since 2008 in Pencaer.
<b>Short Description</b>	As it is located a mile from Strumble Head lighthouse, it is particularly suited to birdwatchers, walkers and nature lovers, so we have always kept an affordable rent in order to attract this kind of visitor.  The house is permanently available for rent, currently being booked for 20-25 weeks (140-175 days) per year.
<b>Impact on the business of 182 threshold</b>	Over the years we have spent considerable sums installing double glazing, renovating the crog loft and improving the heating system, as well as regular redecoration. If the new regulations are agreed, we might have difficulty in achieving 182 days (23 weeks) of letting and therefore would have to pay council tax.
<b>Personal impact</b>	
<b>Turnover</b>	Total profit over 3 years £9,775 The net profit of the cottage in the past three years has been 20/21 £5339 19/20 £4661 18/19 £1335 LOSS
<b>Incremental cost of Council Tax at cost</b>	At present we benefit from SBBR and do not pay any council tax. The rateable value of the property is £2,800 and under the new regulations, we would have to pay £1,498 per annum. Over 3 years this would amount to £4,494 (42% of our profit over these 3 years).
<b>Incremental cost of Council Tax at 200%</b>	
<b>Incremental cost of Council Tax at 300%</b>	
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	If the Council Tax was any higher than this, it would not be worth continuing to rent the cottage. This trend, if more cottages were no longer available for holiday rental (because of being eligible for Council Tax) could impact the local economy which is largely dependent on tourism.

<b>Business Details</b>	Sole trader at Lydstep situated in South Pembrokeshire about 4 miles from the seaside resort of Tenby.
<b>Short Description</b>	Detached holiday letting house (converted in the 1930's) in rural location sleeping 7 persons with large garden valued at approx. £500k I have been trading for 7 years and employ 2 gardeners and a cleaner all of whom live locally.
<b>Impact on the business of 182 threshold</b>	When guests/holidaymakers find it easier to travel abroad again after Covid restrictions it is very likely that only 15 weeks actual letting will be achieved in the short summer holiday letting season. 182 days is unachievable. Letting in the winter months with low rents is not

	practicable due to high costs of heating and provides a window when tradesmen are able to deal with maintenance issues.	
<b>Personal impact</b>	If Small Business Rate Relief ceases to be available and the holiday lettings return to normal levels after Covid then the profit from the business will reduce drastically and the business may even become unviable. I am a pensioner that relies on the holiday letting income for living expenses.	
<b>Turnover</b>	1.1.19 to 31.12.19	£17,658.00
	1.1.21 to 31.12.21	£27,253.00
<b>Incremental cost of Council Tax at cost</b>	Assuming Band F	£2,365.00
<b>Incremental cost of Council Tax at 200%</b>	Assuming Band F	£4,730.00
<b>Incremental cost of Council Tax at 300%</b>	Assuming Band F	£7,095.00
<b>Planning Permission restrictions</b>		
<b>Any Other Comments</b>		

<b>Business Details</b>	A 4 bedroom holiday cottage in New Quay, Ceredigion.
<b>Short Description</b>	trading for over 11 years
<b>Impact on the business of 182 threshold</b>	<p>The holiday season in New Quay is limited and there is no demand in the late autumn and winter months. This is evidenced by the fact that many of the tourist shops/restaurants shut down or have reduced hours over the winter. My property has always been available to let for most of the year, but I do not get bookings in the low seasons</p> <p>As New Quay's economy relies on holiday trade, with less holiday lets, New Quay will have less revenue for the local businesses.</p> <p>As a holiday let, I have to ensure the property is kept up to standard, All remedial work is undertaken by local tradesmen. If I have to sell to a person who has no need to rent out, Ceredigion's revenue will be reduced as there is no guarantee they will feel the need to keep their properties up to standard and local workers and trades people could lose out, as well as those businesses relying on holidaymakers' spending.</p> <p>The problem of affordable housing is a nationwide issue. Singling out a minority sector is short sighted and likely to impact more on the local economy rather than assist locals wishing to buy houses, or significantly increase the council's revenue.</p>
<b>Personal impact</b>	I rely on the holiday income to keep my property up to standard. I do not make a profit. If I do not rent with a

	<p>reasonable return, I cannot do this and would be forced to sell.</p> <p>If I was forced to revert to paying council tax and forced to increase the prices because of the hike in council tax, I do not believe I would get as many bookings and would be forced to sell the property.</p> <p>I have many enquiries from very well off people to buy. If I sold, it would be sold to someone who would be very able to afford to pay whatever tax you impose, without letting out the property at all. Locals do not earn enough from local jobs to be able to afford these properties anyway.</p> <p>I have been coming to New Quay for nearly 40 years. My children have been coming all their life and feel part of the local community which we have supported a long with other family and friends, apart from the holidaymakers. It would be a great loss to us if we were forced to sell, especially when increasing council taxes will not solve the issue of housing for local people.</p>
<b>Turnover</b>	Turnover in 2019 was £7,998 and in 2021 £9,645.44
<b>Incremental cost of Council Tax at cost</b>	£2,668.60
<b>Incremental cost of Council Tax at 200%</b>	£6,452.64
<b>Incremental cost of Council Tax at 300%</b>	£8,603.52
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	

<b>Business Details</b>	Holiday cottage in Brynhenllan, Dinas Cross, Newport, Pembrokeshire
<b>Short Description</b>	in a rural location, on the North Pembrokeshire Coast and have been trading for over 20 years
<b>Impact on the business of 182 threshold</b>	<p>I have been running my business for the last 20 years and the most bookings I have ever received in a single year is 22 weeks. This was during the 21/22 season when the COVID restricted had been relax and people were permitted to visit Wales. This was also during a period when lots of the restrictions for overseas travel remained in place and a significant number of people chose instead to holiday in the UK. The proposal to increase the number of booked weeks to 26 is both unrealistic and unachievable. Wales is not an all-year-round destination and although the property caters for all year round booking the demand isn't there. Increasing the number of booked weeks to 26 means that it's highly unlikely that I will be able meet this new threshold and as a consequence will drop out of the business rate system. Continuing to operate as a furnished holiday letting under this circumstance would be uneconomically viable.</p>

	It would result in me having to increase my rental rates and would be uncompetitive with other parts of the UK.
<b>Personal impact</b>	I have owned the property since 1985 and it was originally built by me to be my family home. This is in fact my first ever home and is not a “second home” I made this property my home for a number of years, and became an establish member of the local community. Unfortunately, because of the availability of highly skilled work in Pembrokeshire it meant that I had no other choice that to move away and seek employment to pursue my career in Engineering. My intent has always been to return sometime in the future to Pembrokeshire and live in the property if an employment opportunity presented itself. Operating the property as Furnished Holiday Let (FHL) has meant that I’ve been able to hang onto the property whilst working away and to benefit the local village with income through tourism. The decision to set unrealistic FHL thresholds and introduce a huge price hike, will force my hand and consider the unthinkable, that is to sell up to the highest bidder (likely to be an outsider) and move away from Pembrokeshire forever.
<b>Turnover</b>	2019 £7500, 2020 £8300 and 2021 £5200
<b>Incremental cost of Council Tax at cost</b>	£1600 per annum
<b>Incremental cost of Council Tax at 200%</b>	£4800 per annum
<b>Incremental cost of Council Tax at 300%</b>	£6400 per annum
<b>Planning Permission restrictions</b>	
<b>Any Other Comments</b>	