



182 day consultation response guide

For businesses in and around Bannau Brycheiniog (Brecon Beacons) National Park

Please respond by Friday 23 October 2026. This guide helps you prepare a response in your own words, whether you operate self-catering accommodation or provide services to the businesses and visitors it supports.

Your experience is the evidence

Please do not copy and paste these suggested answers unchanged. Choose the points you agree with, remove anything that does not apply and explain what happens in your own business. You are free to take a different view from BBT or PASC UK Cymru.

Replace every bracketed prompt with your own information. Name the period covered by your figures, distinguish records from estimates and use a specific example where possible. There is no need to make an answer lengthy to make it useful.

Respond even if you expect an exemption

The exemptions are proposals and have not been finalised. Their wording, scope and conditions could change. If your property does not qualify under the final rules, you may still need to meet the letting threshold. Please give your view on a workable number as well as the exemptions. An expected exemption is not a reason to leave the threshold questions unanswered.

BBT position

PASC UK Cymru recommends 105 actual letting days. This aligns with BBT's preferred position: a substantial reduction that recognises genuine businesses across our area, rather than relying on a long list of exemptions. BBT has previously identified 120 days as an alternative, but 105 is the preferred figure in this guide. Your response must reflect your own view and evidence.

Gather a few useful details

Your location and type of business; days available and actually let for each relevant year; any exceptional closure; local jobs and supplier spending; and what a lower threshold would allow you to change. Suppliers can use the share of their work linked to visitor accommodation and actual changes in bookings or orders.

Using this guide: The headings below summarise the official questions. Read the full wording on the consultation form before answering. The bracketed passages are prompts, not completed answers or claims about every business in the National Park.





Questions 1 and 2 The threshold

Question 1 Reducing the threshold

The form asks whether you support a modest reduction. If you want a larger reduction, make that clear in your reasons. PASC recommends answering Yes and explaining the scale of change you support.

Starting point to adapt: “Yes. I support reducing the threshold, but I believe it should be set at [your preferred number] actual letting days. My business is [type] in [location]. In [year or years], we let for [days] despite [relevant circumstances]. This level would better reflect a genuine business because [your reasons].”

Make it yours: Explain why your preferred number is workable. If you support 105 days, say why it fits your business. If you support 120 or another number, explain that. If you disagree with a reduction, give your reasons. Do not tick Yes without explaining your view of “modest”.

Question 2 Effects on operators

Explain what a reduction would change in practice, including whether a small reduction would be sufficient. Use your records and experience rather than predict the same outcome for everyone.

Starting point to adapt: “For my business, a threshold of [number] would mean [practical effect]. At present, [describe the difficulty or the position if you already achieve 182]. In [period], [specific example]. A reduction to only [number] would [explain whether this would help enough].”

Make it yours: Consider profitability, low-season demand, unprofitable discounting, maintenance, investment, staffing and planning ahead. A rural group property, farm stay or walking-focused business may have different booking patterns: explain yours. Mention stress or health impacts only if you wish and they are relevant.





Questions 3 and 4 Housing and wider businesses

Question 3 Housing and local authority concerns

The question asks about local authorities' ability to address any over-supply of self-catering properties. Recognise housing concerns and explain what you can evidence locally.

Starting point to adapt: "In [place], my experience is [describe local circumstances]. My property is [its history and current use]. I believe a threshold of [number] would [explain the effect on genuine businesses and any housing implications]. Decisions should consider [the local evidence you think is needed]."

Make it yours: Explain whether your property was previously a home, a conversion or purpose-built accommodation, where known. Describe its contribution to local employment and services. Do not assume properties for sale are affordable or suitable for local households. If you cannot assess housing supply, say so and focus on what you know.

For Questions 4 to 8: Choose Yes or No to reflect your own view, then explain it. You can support an exemption while also asking for a lower threshold. You can oppose its proposed scope and suggest a change. Describe the proposal as a proposal, not an existing entitlement.

Question 4 Accommodation within a wider business

PASC recommends Yes: this exemption could help genuine businesses if the threshold is not reduced sufficiently. Consider accommodation functionally linked to another business. Being nearby or under the same ownership does not by itself establish that connection.

Starting point to adapt: "Yes. I support this proposed exemption because [reason]. [If relevant: my accommodation is connected to another business through ...]. I would want the definition to [clarification]. A realistic threshold of 105 days would reduce the need for exemptions and help businesses outside this category because [reason]."

Make it yours: Give the proportion or nature of bookings linked to the wider activity. Explain whether the accommodation could operate or be used independently. If this is not your business model, comment on fairness only where you have a reasoned view; do not claim eligibility.





Questions 5 and 6 Units and planning restrictions

Question 5 Large multi unit properties

PASC recommends Yes, while highlighting unfair boundaries. The proposal concerns five or more units within a single combined rates assessment; owning five separately assessed properties would not automatically qualify.

Starting point to adapt: “Yes. I support recognising genuine multi-unit businesses, but the boundary could disadvantage smaller complexes or large single properties with similar difficulties. [Explain your experience.] A realistic threshold of 105 days would help address this more widely. I suggest [clarification or change] because [evidence].”

Make it yours: Explain the size of your units, their booking patterns and whether all have similar demand. If a large single property or a smaller complex faces comparable difficulties, describe these. Do not assume that any particular property configuration will qualify.

Question 6 Properties with planning restrictions

Consider relevant restrictions preventing permanent occupation or limiting the property to holiday use. Give the actual restriction rather than assuming that all holiday accommodation has one.

Starting point to adapt: “I [support / do not support] this exemption because [reason]. My property’s planning restriction states [accurate wording or summary]. This affects its possible use by [explanation]. I would like the final rules to clarify [point].”

Make it yours: Refer to your planning documentation if available. If you have no relevant restriction, explain your view on the proposal’s fairness. Distinguish a restriction on permanent use from a personal preference to continue holiday letting. Keep your preferred threshold in view even if you expect this exemption to apply.





Questions 7 and 8 Homes and farms

Question 7 Accommodation at the owner's home

The proposal refers to accommodation on land that includes the owner's primary residence under the same registered title. Proximity alone is not enough to assume coverage.

Starting point to adapt: "I [support / do not support] this proposal because [reason]. My accommodation is [describe its relationship to your main home]. The relevant ownership and title arrangement is [what you know]. The practical issue I would like clarified is [issue]."

Make it yours: Describe shared access, services and whether the accommodation could be sold or used independently. Check the title arrangement before claiming it fits. If uncertain, explain that uncertainty. Consider how the proposed boundary could affect otherwise similar nearby businesses.

Question 8 Accommodation on the owner's farm

Consider accommodation operated by the owner or occupier of adjoining agricultural land or buildings. A former farm address is not enough to assume that the proposed exemption would apply.

Starting point to adapt: "I [support / do not support] the proposal because [reason]. Our accommodation is part of [describe the farm and its connection to the letting business]. It contributes [income, work or investment example]. I would want the definition to clarify [point]."

Make it yours: Where relevant, explain farm diversification, local employment and how the income supports the continuing farm business. Say who operates the accommodation and how it relates to the adjoining farm. Avoid assuming all farm conversions will qualify or all could never become homes.





Questions 9 and 10 Other cases and Welsh language

Question 9 Other properties unsuitable as permanent homes

PASC recommends Yes and suggests further circumstances to consider. This question concerns properties that could not be used as permanent homes. Use Yes where you can identify such a circumstance and explain it; do not invent one to follow the recommendation.

Starting point to adapt: “Yes. I ask you to consider [specific circumstance]. My property is [description]. It could not be used as a permanent home because [clear reason], supported by [documentation or evidence]. The existing proposals do not appear to cover it because [reason].”

Make it yours: Use this only where you can explain the constraint. Give relevant planning, construction or access evidence. Being old, listed, rural, expensive to maintain or large does not by itself prove that permanent occupation is impossible. If you know of no additional circumstance, answer No. Put wider business difficulties in Question 12.

Question 10 Effects on the Welsh language

Explain any likely effect on opportunities to use Welsh and on treating Welsh as favourably as English. Use actual links between your business, employment and language use.

Starting point to adapt: “In my business, Welsh is used through [staff, guest information, suppliers or community links]. The proposals could affect this by [explain the connection]. A viable business enables us to [specific activity or opportunity]. I [can / cannot] identify a likely effect on Welsh language use because [reason].”

Make it yours: Examples might include Welsh-speaking employment, bilingual information or Welsh-speaking suppliers. PASC links business viability and local jobs to language use: explain that connection where you can. Do not assume every business has the same language profile or that closure necessarily means a family relocating.





Questions 11 and 12 Further evidence

Question 11 Improving Welsh language outcomes

Suggest how the proposals could increase positive effects or reduce negative ones. Connect the change you recommend to a practical language outcome.

Starting point to adapt: “I support a substantial reduction to 105 days because [your reasons]. For my business or community, this would help [specific language opportunity] by [explain how]. Alongside a workable threshold, [practical suggestion] would support Welsh language use.”

Make it yours: You could explain how business stability supports a Welsh-speaking job or allows investment in bilingual guest information. If you cannot identify a supported suggestion, say so. Do not repeat Question 10 unchanged or promise an outcome you cannot evidence.

Question 12 Other points and your strongest example

Use the final question for relevant evidence not covered elsewhere. Prioritise your strongest example and the change you want the Government to consider.

Starting point to adapt: “The additional point I ask you to consider is [issue]. In [period], our business experienced [what happened], which affected lettings or local spending by [recorded figure or clearly labelled estimate]. I would like [specific change] because [reason].”

Make it yours: Examples could include exceptional closures, refurbishment, the effects on suppliers or unclear exemption boundaries. Existing averaging and charity-break provisions should be acknowledged if relevant: explain any remaining gap. If proposing 105 days let and 210 available, make clear you are asking for both changes; lowering the letting threshold would not automatically change the availability requirement.





Further evidence to consider

PASC offers a broad set of arguments. Choose those you can support, rather than trying to include them all. The following prompts supplement Questions 1 to 12 and can help you use the final answer space effectively.

Why 105 rather than 154: PASC argues that a small reduction would leave many genuine businesses facing the same difficulties. If your figures support this, show the difference between 182, 154 and 105 days for your business. The historical HMRC furnished holiday lettings benchmark is a supporting comparison, not a current tax entitlement.

Days available as well as days let: PASC recommends 105 days let out of 210 available. If you agree, explicitly ask for both figures. Explain your seasonal opening pattern. Do not treat the proportion of two minimum thresholds as your business's actual occupancy rate: calculate that from your own days let and days available.

Exceptional interruption: Describe any fire, flood, access disruption, serious illness or necessary building work, with dates and lost trading time. Explain what existing averaging arrangements do or do not resolve. PASC suggests clearer provision for exceptional circumstances: say what would have helped you.

Profitability and wellbeing: Give an example of extreme discounting, loss-making short bookings or the pressure to accept unsuitable bookings, if these occurred. Explain the effect on investment, workload or wellbeing without including personal details you do not wish to share.

Fair treatment across businesses: Explain any comparison between exempt and non-exempt businesses that you can support. PASC highlights smaller standalone operators and large single properties. Ask for clear definitions and a workable threshold rather than assuming an exemption will be enacted or will cover you.





Local evidence and submitting your response

Local work and future generations: Use actual jobs, supplier spending and family business plans. Where relevant, explain whether holiday letting supports an active farm, keeps employment locally or enables succession. Do not assume that every holiday property has the same history or housing implications.

Other evidence of genuine trading: PASC suggests considering VAT registration, company status and employment as further indicators. Describe them if relevant to your business. They are not proposed automatic exemptions, and genuine sole traders or businesses without employees should not be overlooked.

Business rates registration: If council tax changes influenced your decision to register for business rates, explain your own timeline. Do not use that personal experience to claim it explains every change in accommodation numbers across Wales.

Connected businesses: If you are a cleaner, activity provider, attraction, food business or other supplier, state how accommodation supports your work. Use actual orders, referrals or a labelled estimate of related income. Adapt the wording throughout to your role rather than implying that you own a holiday let.

Before submitting: Remove all brackets and unused alternatives. Check figures, explain your own view and read the full official questions. Submit directly to Welsh Government by 23 October; sending your comments to BBT is not a consultation submission.

Official consultation and response options <https://www.gov.wales/classification-self-catering-properties-local-tax-purposes-html>

PASC UK Cymru full guidance <https://www.pascuk.co.uk/182-2/>

Prepared by Brecon Beacons Tourism using the official consultation and the supplied PASC UK Cymru owners' guidance. This shorter local guide is BBT's adaptation, not a PASC publication. Check the current consultation wording when preparing your response.

