



Professional Association of Self-Caterers UK

NEWSLETTER

6 May 2024 Issue 210

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COMMENTARY

Last week was the Treasury Meeting and a House of Commons Debate on FHL Allowances. For full details and reports please see below.

You can also find the link to register for the first, of what we expect will be several Webinars with our accountancy partner on the proposed abolition and the consequences. Members can register below for this Webinar where Francis Clark will be updating Members and taking questions which will take place on **Thursday 9 May at 1030.**

The Supporting FHL Paper commissioned from Francis Clark is now available to all, and can be found here for Members: <https://www.pascuk.co.uk/member-reports/>

It can be found here for Non Members <https://www.pascuk.co.uk/reports/>

We have also called a PASC UK Members Webinar for **1030 on the 29th May.** See below.

Plus, we are having a Webinar with our Data Partner, **Key Data** on the **25th June at 1100.** See below.

Whilst in London this week, we have also been asked to attend a Meeting with the Fire Team at the Home Office and will hopefully have something to update everyone with as a result of that meeting.

We have been invited to speak at the North Wales Tourism Conference on the 4th June and are taking advantage of that to call a PASC UK Cymru Members Meeting on the morning of the 5th June, from 1030-1300. It will be in the area between Llandudno and Abergele. We will set up a link to book attendance by next week when we have found a venue, so a holding note for PASC UK Members in that area.

Once again, we inevitably slip behind a bit on email when on the road, we are pretty much up to date, but are away from the office for two days again this week, so please bear with us, and if something is urgent, please email support@pascuk.co.uk As always, any questions please let us know. Best regards

Alistair

CHAIR HOLIDAY COMING UP, 19-27 MAY

Alistair will be on leave from the 19th May and returning on the 28th May. He will be out of the country and his email will have an out of office explaining how Members can get support during this period, this will also be covered in future Newsletters.

PASC UK LOOKING FOR TECHNICAL WRITER TO JOIN THE TEAM

We are looking to expand the team at PASC UK and are asking Members and Readers first if they are interested, or if they know of anyone who may be interested.

We are looking for someone who can help with more 'technical papers'. To give examples, these would be around Business Rates and Valuation Office papers and procedures, covering both England and Wales. As opposed to 'marketing papers' on EV charging and dog friendly.

The initial Term would be for 3 months, working for the equivalent of one day per week. The daily rate would be £250. The work would be carried out as a contractor to PASC UK, with a formal contract.

A successful conclusion to the work would most likely need to the contract being extended, as there are endless interventions from Government, from which logs you can burn, to detail on planning interventions.

If you think you may be interested in the role, or know someone who might be, please send an email to support@pascuk.co.uk and we will send further details.

ABOLITION OF FHL ALLOWANCES UPDATE 6 May

For previous updates see past newsletters here: <https://www.pascuk.co.uk/newsletters/general-newsletters/>

Where are we?

Tonight, we have been invited to a private dinner where the Chancellor of the Exchequer, Jeremy Hunt MP, is the main guest. We will have a chance to ask him questions and will leave him with a letter, asking to see their evidence to support the policy, and attach our latest one pager, to show ours, as to why theirs is flawed.

Last week saw the Sector Meeting with Nigel Huddleston and his Treasury advisers on Tuesday and the Debate in Westminster Hall on Wednesday. At the bottom of this note and attached, you will find the following:

- Link to Report on the Meeting with Treasury
- Link to Report on the Westminster Hall Debate
- A link to the full Westminster Hall debate video
- A link to some BBC Coverage of the debate, (short concise 2 mins).
- Hansard script on the Westminster Hall debate
- A link to the House of commons papers for the debate.

The Meeting



L-R Alistair Handyside, Exec Chair, PASC UK, Heather Britton, Director, Francis Clark, Simon Jupp MP, and Nigel Huddleston MP and Treasury Minister.

For brevity, the Meeting notes can be found here for those that wish to read them:

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

The meeting achieved a key outcome in that we have a channel with Nigel Huddleston and Treasury Officials to provide data and case studies to try and continue to make our case. Nigel Huddleston appeared to rule out a full public Consultation on the basis that this is already stated policy and once policy intentions are confirmed it is not conventional to then have a public consultation.

Whilst the likelihood of another Finance Bill is incredibly slim in this Parliamentary Term, we cannot rule it out completely. Most supportive MPs think it is highly unlikely, and dedicated time to debating FHL allowances as part of that Bill is less likely still. One danger that we face is that many MPs now think that this is in the 'long grass' or 'never going to happen' and will move onto other matters. This will leave a lot of owners in an uncertain position as to how to manage their tax affairs.

Whilst we are clear on the overall Lib Dem Policy, they support Abolition, Labours position is less clear at the moment. The iParl petition hit mostly Conservative and Lib Dem MPs as that's where the FHL's are, so we have limited data on MP responses from Labour and they are remaining pretty silent on it. We will be working hard to get those Labour Meetings to clarify.

Our view is that we continue to battle on to get what concessions may be possible, particularly around Cap Allowances. Whatever we can get now, even if it does not get passed this Parliamentary Term, will help when it inevitably comes up again in the future as we now have active engagement with HMT advisers.

It will though be harder for the Govt to drop the 'alignment' of interest now they have had made such committed statements, although nothing is impossible. More likely are some kind of agreement around Capital Allowances and an extension to phasing out the interest allowance, as they did for long term lets.

There were some awkward moments around possible implications of changes to Cap Allowances in the meeting and we will be building on those as we go forwards.

We have been given the opportunity to follow up with Treasury and will do so.

The Debate



Peter Aldous opens the Debate in Westminster Hall.

For brevity, the Debate notes can be found here for those that wish to read them:
<https://www.pascuk.co.uk/reports/>

All in all, this went well. A good turnout for this kind of session, especially on eve of Local Elections and a Bank Holiday Weekend. The MPs homework that was provided to support MPs in the Debate meant that most of the key questions were asked, in one form or another. If you watch it there are numerous interventions, and from across the political spectrum. It was lively and showed that there is a deep concern about the wider impact of this policy.

Our first action on Tuesday will be to write to each MP that attended a tailored thank you letter and to open doors to those we have not previously met.

Nigel Huddleston remained resistant to a public Consultation in the Debate too, hardly unexpected, and largely trotted out the usual response. He also said that although he recognises problems for

properties that cannot be residential, he is resistant to carve outs, exemptions etc. Worth watching this from 27 mins in if that's all you watch. (Link to recording below). He was though less assured in answering the questions at the end, and it clearly showed how we must maintain MP pressure on Treasury, as this is our key weapon.

MPs Pressure

We will be contacting all the supporting MPs to gather their input and to test their appetite to battle on over the coming days. We know some are firm on this and will be relying to some extent on them to help maintain momentum with colleagues. We do have some brilliant supporters and will have to make the most of them.

All the MPs who attended and took part in the Debate will receive individualised thank you's and more information and data as we have it available.

It's worth also looking at the coverage from BBC Spotlight (Link below), from their Political Commentator who summarises well the feedback that we are getting from MP's. It's only a couple of minutes long.

Next Steps

We will start gathering the case studies and think about what further data, or interpretation of the data, we can provide treasury Officials. We need to reflect on where we have got to so far and consult with our key MP supporters and advisors about what is next for the advocacy approach.

To that end we would welcome thoughts and suggestions and will pull this together over the next week or so. We will of course keep you in the loop.

- The Westminster Hall debate can be seen here: <https://vimeo.com/941931469?share=copy>
This is an edit that only encompasses the FHL Debate
- The BBC Spotlight News coverage is here: <https://vimeo.com/941934045>
- Additionally, the Hansard transcript has now been published [here](#). The debate begins at Column 152WH.
- Here is the link to the Westminster Hall Debate commons library briefing paper: <https://commonslibrary.parliament.uk/research-briefings/cdp-2024-0088/>
- You can find the Treasury Meeting Note and the Debate Meeting Notes here: <https://www.pascuk.co.uk/reports/>

iParl Petition to MPs V1, Owner Survey Monkey and Parliamentary Petition

- iParl petition at 15,165
- Survey Monkey at 7,045
- Parliamentary Petition at 4,971

This is without doubt the most sustained lobbying that has ever occurred in our sector and shows just how concerned Members and Owners are by the proposed Abolition. A huge thank you to each and every one of you that took part, and a special mention to all our 125 Agency Members who were instrumental in helping get so many to participate. Thank you 😊

The Survey outstrips anything we have ever seen in our sector and has provided us with data that we have used to lobby on your behalf. The best way to see this is to look at the **PASC UK FHL Report** which you can find here: <https://www.pascuk.co.uk/reports/>

We have a short summary that is a word doc, called **PASC UK Short FHL report May 2024**, which you can chop and change to lobby your own MP. That can be found here: <https://www.pascuk.co.uk/reports/>

There is also one pager on FHL, that you may consider sending, along with your letter to your MP. This can be found here: <https://www.pascuk.co.uk/newsletters/general-newsletters/>

We continue to encourage owners who have received responses from MPs to respond to their MP suggesting what they might say if the MP has sent a standard central office response, or if they have indicated support.

When we are copied in that they have indicated any level of support we have written individually to them, we follow up with an invitation to meet, in person or virtually, and send them all the up-to-date information.

This constant backwards and forwarding help to get your MP to change stance. It is also creating the opportunity for owners to meet in groups with MPs in Wales, Scotland and England. These groups have been assisted with phone, email, additional notes from PASC UK for the meetings. Significant further meetings for PASC UK with MPs have also been enabled by this process.

WHAT CAN YOU DO TO HELP AND TO MAINTAIN THE PRESSURE? UPDATE 6 MAY

Write again to your MP

If you have not written to your MP yet, here's the link to do so: <https://pascuk.eaction.online/FHL> using the Petition link, which has a prepared letter that you can modify.

Or:

It's easy to find your MPs email address. You can use this tool: <https://members.parliament.uk/FindYourMP>

You should all have received responses from your MP by now. If not send in another email to them.

There are two kinds of response.....

If your MP is supportive

Write back, replying to their email, thanking them, and saying that many other MPs are also supporting businesses like yours, and that common phrases coming back from these MPs are that a

full Consultation is needed, concessions need considering and carve outs need to be offered for real businesses. If you are limited by planning for holiday use only, say that too. Ask them to write to the Treasury Minister again and tell him of the impact that this will have on you, perhaps saying at the very least that the Government should agree on a full Consultation to fully understand the real impacts of this policy. If you can copy support@pascuk.co.uk into these emails it will tell us which MPs are either wavering or supporting and we will also follow-up directly sending them information on the impact of abolition.

If your MP is not supportive or has just been lazy and offered a standard 'Central Office' Response

Point out the following, you have done nothing wrong, you followed HMRC rules, the alleged loophole has been caused not by rules changes for FHL's but because the Government has come down too hard on Long Term lets.

If your property has planning limitations, then raise that too. Explain how this will affect you, as a business and as individuals. The impact on your savings, pensions and retirement plans. If your property is never going to end up as an affordable home or a starter home for any reason point that out. Why persecute businesses for a goal that will never be achievable? Ask for a meeting so that you can make your case.

TAX COMMENTARY AND PAPER FROM FRANCIS CLARK



THIS PAPER IS AVAILABLE TO ALL READERS OF THE NEWSLETTER.

We have commissioned the tax advice and support necessary for our owners from FHL Experts Francis Clark.

The initial Paper is now ready and available on the Website.

PASC UK Members can find it here, where you will not have to provide your email address to download a copy: <https://www.pascuk.co.uk/member-reports/>

Non-members can find it here: <https://www.pascuk.co.uk/reports/>

The first Webinar on FHL Allowances takes place on Thursday at 1030, link for Members to register can be found in the Webinars section of the Newsletter.

There is also an updated note, written by Francis Clark that appeared first in Taxation Magazine: You can access it here: <https://www.pkf-francisclark.co.uk/what-is-happening-to-the-furnished-holiday-letting-rules/>

We anticipate we will then be publishing further papers and holding webinars to help you navigate through any potential changes as soon as we get further detail from Treasury.

Francis Clark have published an updated piece of FHL Abolition on their website and gives some useful further information. <https://www.pkf-francisclark.co.uk/fhl-regime-rules/>

Their Original piece is here: <https://www.pkf-francisclark.co.uk/restricted-use-holiday-lets/>

Please take Expert advice

We remain wary of trying to answer or advise owners on what to do, this is financial advice and just like legal and fire advice this needs to come from experts. Whilst owners are understandably keen to act quickly and agency Members keen to inform their owners, we just really do not have any hard information yet.

The accountancy firms have no detail either, so please regard the paper that we are publishing today as V1. As things change, we will update the Paper and share with you.

We would caution any reader taking any premature action, until at least some real clarity is available.

There is a large amount of hopelessly inaccurate information on social channels and blogs right now, no one knows anything about what changes WILL happen, no detail has been released beyond the 'ambition' to abolish FHL, and abolition is not in the Finance Bill. We recommend that you check any source of advice on what to do, before following it.

This is why we commissioned Francis Clark (FC) in Exeter to assist on this. (Partner John Endecott and his team are well known to us and recognised as the FHL experts). We meet with them regularly and will be able to share updates as to what is possible as more detail emerges from Treasury.

Any suggestions?

Please let us have any feedback on the above and any questions also suggestions as to further actions welcome. Please send to support@pascuk.co.uk

PASC UK WEBINAR AND MEETINGS PROGRAMME FOR MAY 2024 UPDATED 6 MAY

We will shortly be announcing further webinars and meetings for the May programme. These will include the following:

- Fire Update (Open plan Guidance, subject to update from Home Office)
- Sustainability and our sector
- And more.....

We are just getting availability for the speakers and expect to announce these dates next week.

Previous webinars and meetings can be viewed on the PASC UK Website at:
<https://www.pascuk.co.uk/webinars/> Members only recordings are in the Members area.

1/ PASC UK Members Webinar with Francis Clark to covering potential changes to FHL Allowances

1030 on 9 May 2024

The team from Francis Clark, will be joining us for this webinar to cover the potential impacts of the abolition of FHL Allowances.

We will cover the following:

- Introduction to Francis Clark
- What do we really know about what may be abolished?
- What progress has been made with HMRC in the various meetings?
- Discussion around the Bright-Line tests, are they likely to play any part in any amendments?
- Common 'what if?' scenarios to help key timing decisions
- Q&A

Please register using this link:

https://us06web.zoom.us/webinar/register/WN_6Jv8QP62QB0mW7btjdD4og

Once we have checked your Membership Status, we will send you a link to join the webinar. Our Webinar limit is set by our Zoom account at 500, so this will be on a first come first served basis. We will run further Member Webinars on this subject if there is demand, or there are significant announcements made.

2/ PASC UK Members Webinar

1030 on 29 May 2024

Please join us for a Webinar where will give a General Update and try and take as many questions as we can.

We will cover the following:

- General Update
- FHL Abolition, Statutory Registration, Planning Changes Update
- Additional resources at PASC UK
- Members Q&A

Please register using this link:

https://us06web.zoom.us/webinar/register/WN_vVuLhuyHTiGI9DYclT7QtQ

Once we have checked your Membership Status, we will send you a link to join the webinar.

3/ PASC UK and Key Data Webinar

ANY SELF-CATERING/SHORT TERM LET BUSINESS CAN ATTEND

1100 on 25 June 2024

Please join us for a Webinar where we will introduce you to our Data Partner, Key Data. We have partnered with Key Data to assist us in getting national data on the sector, to help with our lobbying. We hope to provide a snapshot of the Year to date next as an example.

From an owner's point of view, you will be able to not only see national statistics, but how you can use the data to best effect to help your business perform better.

We will cover the following:

- Who are Key Data?
- Where does the data come from?
- How can an independent operator get the data?
- What the data looks like, and how you can compare rates with other local businesses and occupancy to, to drive better pricing policies.
- Q&A

Please register using this link:

https://us06web.zoom.us/webinar/register/WN_vVuLhuyHTiGI9DYclT7QtQ

Upon registration you will automatically get a link by email to use to join the Webinar.

PASC UK ON THE ROAD AND IMPORTANT MEETINGS AHEAD

Over the coming weeks PASC UK will be present at the following events:

- 15th May. Tourism Alliance Board, London
- 16th May. Business Breakfast, Devon County Show
- 29th May. CLA Regional Meeting, Arundel Arms.
- 4th June. North Wales Tourism Conference, (Details available shortly)
- 5th June. Wales PASC UK Members meeting, (Details to follow shortly)
- 5th June. Visit England National Tourism Awards. Liverpool
- 18th June, Tourism Alliance AGM

IN PERSON PASC UK MEMBERS MEETINGS UPDATE 30 APRIL

We are preparing to roll out in person Members meetings across England and Wales after the success of the meetings in Northumberland, Devon, Cornwall, Wales and Worcestershire.

We have been invited to speak at the North Wales Tourism Conference on the 4th June and are taking advantage of that to call a PASC UK Cymru Members Meeting on the morning of the 5th June, from 1030-1300. It will be in the area between Llandudno and Abergele. We will set up a link to book

attendance by next week when we have found a venue, so a holding note for PASC UK Members in that area.

- Northwest Wales PASC UK Cymru Members Meeting. 5 June 1030-1300.
- The next meeting will be in Norfolk
- Followed by the Brighton area

STATUTORY REGISTRATION & PLANNING CHANGES ENGLAND NO CHANGES WEEK OF 6 MAY

Each week we publish a summary of any updates as we have them on both Statutory Registration and the proposed Planning Changes.

Rather than repeat, each week we will provide an update of that week only. You can refer to previous Newsletters here: <https://www.pascuk.co.uk/newsletters/general-newsletters/>

Both DCMS (the Govt Department that leads on Tourism) who lead on Registration, and DLUHC (the Govt Department that lead on planning) have both said that they expect the formal responses to last summer's Consultations into Registration and Planning to come out before the summer recess - so before 24 July this year.

It is likely that that is when we will know the full detail of what both interventions will contain. We will continue to have meetings with both departments and keep you abreast of any developments.

Updated comments on the Registration Scheme.

No further meetings with DCMS this week.

Updated comments on Planning Changes.

No further meetings with DLUHC this week.

Links to Government Announcements:

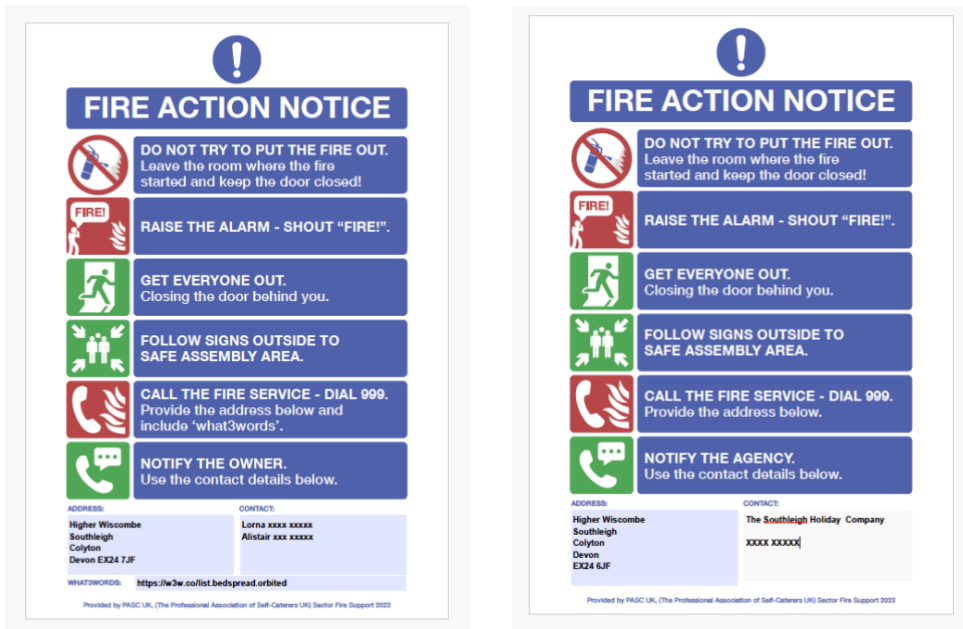
https://www.gov.uk/government/news/short-term-lets-rules-to-protect-communities-and-keep-homes-available?utm_medium=email&utm_campaign=govuk-notifications-topic&utm_source=abcf45c0-6cb1-41e0-8fb3-addcbdd3400c&utm_content=immediately

and from DCMS:

https://www.gov.uk/guidance/delivering-a-registration-scheme-for-short-term-lets?utm_medium=email&utm_campaign=govuk-notifications-topic&utm_source=57e40b2f-17ef-4143-b404-b80b0ae62c39&utm_content=immediately

Any questions to chair@pascuk.co.uk

FIRE GUIDANCE WHERE TO FIND IT ALL? NO CHANGES WEEK OF 6 MAY.



They can be found here: https://www.pascuk.co.uk/fire_checks_and_safety/

There are short docs that summarize the current situation with Fire Regs in self-catering in England and Wales. They signpost you to all the regulations, the Government produces Guidance, the additional PASC UK papers and more.

They can be found here: https://www.pascuk.co.uk/fire_checks_and_safety/

If you are looking for information on why the regs are now law in England, and coming in Wales, or what a Responsible person is, please refer to recent Newsletters.

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

Main Home Office Papers

Home Office Guidance on Making your small paying guest accommodation safe from fire 2023

This paper covers small units, without open plan downstairs, not more than four bedrooms, sleeping no more than twelve in two storey buildings.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147723/A_guide_to_making_your_small_paying-guest-accommodation_safe_from_fire.pdf

Fire Safety Risk Assessment Sleeping Accommodation

This paper goes some way to helping with larger properties, but is an old paper, published in 2006 and is currently being updated by the Home Office. Earliest date expected is around the end of the year.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/422192/9281_Sleeping_Accommodation_v2.pdf

Additional PASC UK Supporting Papers

To help owners navigate through this, and to supplement the Government Papers mentioned above, we have commissioned three initial papers from our Fire expert, Paul Bray, GFireE, Fire Safety Consultant.

The papers are number 1,2 and 3. They can be found here: <https://www.pascuk.co.uk/reports/> and also here: https://www.pascuk.co.uk/fire_checks_and_safety/

Paper One: The Regulatory Reform Fire Safety Order 2005

This is a background paper explaining the legal background of the Fire Regs and the Fire Regs.

Paper 2: Additional Notes to the Home Office Guidance on Making your small paying guest accommodation safe from fire 2023

This paper provides additional notes to use in conjunction with the Home Office Guidance on Making your small paying guest accommodation safe from fire paper.

Paper 3: Applying the Sleeping Risk Guide to existing holiday accommodation

This paper provides the first paper on providing additional information for larger properties.

Fire Checks at Changeover, Routine maintenance and Testing V1

This provides a guide to fire checks at changeover, and a testing regime.

How to find a Competent Fire Risk Assessor?

This provides the websites where you can find authorised fire experts.

Updated Fire Risk Assessment

Suitable for use with the 'Small' guide from the Home Office and Welsh Fire, with the addition of a 'Review Date' box.

Train as a Competent Fire Risk Assessor

Lots of request about how to become a Competent Fire Risk Assessor. This is probably only feasible and of interest to those with multiple properties or agencies.

Additional Fire Safety Notices (without What3Words)

We have produced some further Fire Safety Notices without a space at the bottom for What3Words. We really do recommend that you include creating a What3Words reference for your property as most emergency services all over the country use it.

What3 Words explained

What3Words is and how to use it.

FAQ's

We have published the first sets of FAQ's, the most asked fire questions. This will be regularly updated and when updates are made, they will also appear in the newsletter.

These can all be found at https://www.pascuk.co.uk/fire_checks_and_safety/

Members questions are welcome on any issues that they have with their Fire Risk Assessments, and we will answer as best we can. We are not ourselves fire safety experts and will do our best to try and offer solutions or signposts to solutions. We are afraid that we cannot answer non-Members questions on fire issues.

SUPPORT LOBBYING BY JOINING PASC UK

There is a huge amount of work and lobbying to do to help support you all in the self-catering sector. We don't ask very often, however, if we are to fight on so many fronts, we simply need more funds. There are thousands of you that have had the benefit of this newsletter and the lobbying done on behalf of the sector.

We are now asking that as many of you as possible join PASC UK. The fight is on so many fronts, and we get much better results when we engage proper legal advice and proper PR firms to assist with campaigns. Memberships to other organisations that provide common lobbying, information feeds and support also cost many thousands of pounds a year.

Membership fees are as follows: All per annum.

- Single cottage £80
- 2 – 4 Units £140
- 5 – 10 Units £220
- 11 + Units £320.

Members get telephone support and priority email support.

You can join here, simple form, takes 2 mins, and you'll get an invoice, payable by BACS or Credit Card. Just click on this link to go to the joining page: <https://www.pascuk.co.uk/join-pasc-uk/>

Wishing every one of you all the best.

Best regards

Alistair Handyside MBE
Executive Chair
The Professional Association of Self-Caterers UK
www.pascuk.co.uk
support@pascuk.co.uk

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