

# Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill Stage 1 report

December 2025



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# **Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill**

## Stage 1 report

December 2025



# About the Committee

The Committee was established on 23 June 2021. Its remit can be found at:  
[www.senedd.wales/SeneddEconomy](http://www.senedd.wales/SeneddEconomy)

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Current Committee membership:



**Committee Chair:  
Andrew RT Davies MS**  
Welsh Conservatives



**Hannah Blythyn MS**  
Welsh Labour



**Alun Davies MS**  
Welsh Labour



**Luke Fletcher MS**  
Plaid Cymru



**Samuel Kurtz MS**  
Welsh Conservatives



**Jenny Rathbone MS**  
Welsh Labour

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The following Member attended as a substitute during the scrutiny of the Bill.



**Julie Morgan MS**  
Welsh Labour



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## Chair's foreword

The Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill represents the Welsh Government's latest intervention in the tourism sector. It builds on the registration of visitor accommodation providers framework in the Visitor Accommodation (Register and Levy) Etc. (Wales) Act 2025 with the introduction of a licensing scheme for visitor accommodation in Wales.

Throughout our scrutiny, we found broad support for the Bill's general principles, particularly its intention to raise standards, improve safety, and create a level playing field for visitor accommodation providers.

However, we also heard strong concerns about the timing of the Bill's introduction and the detail of its implementation. The accelerated timetable for Stage 1 scrutiny limited our opportunity for thorough consultation and evidence gathering. We regret the constraints imposed by this timetable and caution against such compressed legislative processes becoming normalised for non-emergency legislation in the future.

A recurring theme in our evidence was the need for robust data to underpin policy decisions. The absence of reliable information on the size and characteristics of the sector was widely acknowledged, including by the Welsh Government. It is vital that future decisions are informed by comprehensive data and ongoing dialogue with the sector.

We also highlight the importance of clear, practical guidance and proportionate regulation. The Bill's success will depend on effective implementation and meaningful consultation on future regulations made under powers proposed in the Bill. We call on the Welsh Government to provide further clarity on key aspects of the Bill, including enforcement arrangements, training requirements, and the complaints process, and to ensure that the voices of providers, local authorities, and other stakeholders are heard at every stage.

Tourism is a vital part of Wales's economy. This Bill, together with the Visitor Accommodation (Register and Levy) Etc. (Wales) Act 2025, has the potential to strengthen the sector, enhance visitor confidence, and support sustainable communities. However, we remain mindful of the legislation and policy fatigue felt by witnesses as a result of changes brought forward during this Senedd term.

The Committee supports the general principles of the Bill, while making a series of recommendations to ensure that its implementation is fair, effective, and responsive to the needs of all those it will affect.



I would like to thank all those who contributed to our scrutiny, particularly given the challenging timeframe. Your insights have been invaluable in helping to shape our conclusions and recommendations.

A handwritten signature in black ink that reads "Andrew RT Davies". The signature is written in a cursive, slightly informal style.

**Andrew RT Davies MS**

Chair

## Conclusion and recommendations

**Conclusion 1.** The Committee regrets the short timetable allocated for Stage 1 scrutiny of the general principles of the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, and the negative effect this has had on the ability of stakeholders to contribute to the process..... Page 16

**Recommendation 1.** Future Seneddau and governments should not take the timetable afforded to this Bill as a precedent for the making and scrutiny of non-emergency legislation. Such a short timeframe should be avoided unless exceptional circumstances demand otherwise. .... Page 16

**Recommendation 2.** The Committee recommends that the Senedd, taking into account the recommendations in this report, agrees the general principles of the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill. ....Page 42

**Recommendation 3.** The Welsh Government should amend the Bill at Stage 2 to make commencement of the licensing scheme subject to further Senedd approval.....Page 42

**Recommendation 4.** The Welsh Government should amend the Bill at Stage 2 to ensure that commencement of the Bill's provisions can take place no later than the end of the next scheduled Senedd term.....Page 42

**Recommendation 5.** In his response to this report, the Cabinet Secretary should set out what discussions have taken place, and are planned to take place, with representatives of the tourism industry on proposals for the Bill's implementation. ....Page 42

**Recommendation 6.** In advance of the Stage 1 debate, the Cabinet Secretary should set out what amendments he plans to bring forward at Stage 2. ....Page 43

**Recommendation 7.** The Welsh Government should amend the Bill at Stage 2 to commit to undertaking and publishing a review of the operation and effect of the provisions in the Bill by no later than April 2034. ....Page 47

**Recommendation 8.** In responding to this report, the Welsh Government should set out what work has been carried out to date on developing the code of

practice and associated guidance. Further, the Welsh Government should provide further detail on the anticipated content of the code.....Page 50

**Recommendation 9.** The Welsh Government should consider amending the Bill at Stage 2 to ensure an appropriate minimum time period for Senedd consideration of regulations proposed under section 5.....Page 77

**Recommendation 10.** The Welsh Government should ensure that guidance issued under section 55 addresses visitor accommodation providers' obligations in relation to the general fitness standard in section 7..... Page 78

**Recommendation 11.** The Welsh Government should address waste management and anti-social behaviour issues in its code of practice, to ensure that operators are aware of their responsibilities and, further, should amend the Explanatory Memorandum to set out the licensee's existing obligations relating to the disposal of visitor waste..... Page 78

**Recommendation 12.** The Welsh Government should consider including energy performance certificates as an additional standard when exploring future updates to the licensing scheme. .... Page 78

**Recommendation 13.** In advance of the Stage 1 debate, the Cabinet Secretary should confirm whether he intends to bring forward amendments at Stage 2 to in relation to the proposed fire prevention standard in section 9..... Page 78

**Recommendation 14.** The Welsh Revenue Authority should commit to providing regular updates on its work relating to the register and the licensing scheme to a relevant committee of the next Senedd. ....Page 80

**Recommendation 15.** In advance of the Stage 1 debate, the Cabinet Secretary should review the additional evidence provided by the Short Term Accommodation Association and confirm the average number of total licences that Rent Smart Wales deals with each year and the time taken to process applications at present. The Cabinet Secretary should also set out any estimate he has made of the length of time it will take to process and issue the estimated 30,000 visitor accommodation licences that will need to be issued in the first year of operating the licensing scheme.....Page 80

**Recommendation 16.** The Welsh Government should amend the Bill at Stage 2 to extend the minimum period for which a visitor accommodation licence may be granted.....Page 80

**Recommendation 17.** In advance of the Stage 1 debate, the Cabinet Secretary should provide further information to the Senedd about how the provision for complaints in section 22 is expected to work in practice, including how complaints will be assessed and what the practical effect will be of a complaint being upheld. ....Page 80

**Recommendation 18.** In advance of the Stage 1 debate, the Welsh Government should update the Committee on discussions with local authorities as to their potential role in the enforcement process, and clarify the potential role Visit Wales might play. .... Page 81

**Recommendation 19.** The Welsh Government should bring forward an amendment to the Bill at Stage 2 to provide that the regulations made under section 38 will be subject to the Senedd approval procedure. .... Page 82

**Recommendation 20.** In advance of the Stage 1 debate, the Welsh Government should set out in further detail how the provision in section 42 is intended to work in practice, including its justification for the inclusion of 42(4). .... Page 82

**Recommendation 21.** In advance of the Stage 1 debate, the Cabinet Secretary should:

- provide an update on discussions with booking platforms / agents regarding the provisions in sections 46 and 47,Page
- provide further information on the rationale for extending the proposed offence to bodies other than visitor accommodation providers, and
- provide further information on the specific steps that may need to be taken to establish a defence to the proposed offence. ....Page 88

**Recommendation 22.** The Welsh Government should consider tabling an amendment to the Bill at Stage 2 to limit the scope of the advertising and marketing offence in section 47 to visitor accommodation providers only..Page 88

**Recommendation 23.** In advance of the Stage 1 debate, the Cabinet Secretary should respond to the specific additional evidence received by the Committee. ....Page 90

## 1. Introduction

The Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill (“the Bill”) was introduced on 3 November 2025 and was referred to the Economy, Trade and Rural Affairs Committee for scrutiny of its general principles.

1. On 3 November 2025, the Cabinet Secretary for Finance and Welsh Language, Mark Drakeford MS (“the Cabinet Secretary”), introduced the Bill<sup>1</sup> and an accompanying Explanatory Memorandum (“the EM”).<sup>2</sup> A Statement of Policy Intent was also published for the Bill.<sup>3</sup>
2. In accordance with Standing Order 26.9, the Senedd’s Business Committee referred the Bill to the Economy, Trade and Rural Affairs Committee (“the Committee”) for consideration of the general principles (Stage 1). The Business Committee agreed that the Committee should report by 19 December 2025.<sup>4</sup>

## The Committee’s approach

### Background

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3. On 6 October 2025, the Welsh Government published a draft version of the Bill.<sup>5</sup> The Welsh Government also shared a draft version of the Explanatory Memorandum with the Committee and with select stakeholders.
4. In light of the information shared by the Welsh Government, the Committee was able to provisionally agree its approach to scrutiny in advance of the Bill’s formal introduction.

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<sup>1</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, as introduced

<sup>2</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, Explanatory Memorandum

<sup>3</sup> Statement of Policy Intent for Subordinate Legislation, November 2025

<sup>4</sup> Business Committee, Timetable for consideration: Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, November 2025

<sup>5</sup> Welsh Government, Written Statement: Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, October 2025

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## Terms of reference

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**5.** On 22 October 2025 the Committee agreed the following framework within which to scrutinise the general principles of the Bill, which was to consider:

- the general principles of the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill and whether there is a need for legislation to deliver the Bill’s stated policy objectives;
- the Bill’s provisions, including whether they are workable and will deliver the stated policy intention;
- any potential barriers to the implementation of the Bill’s provisions;
- whether there are any unintended consequences arising from the Bill;
- the Welsh Government’s assessment of the financial and other impacts of the Bill as set out in Part 2 of the Explanatory Memorandum; and
- the appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Part 1: Chapter 5 of the Explanatory Memorandum).

## Evidence gathering

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**6.** Due to the constricted time for scrutiny, the Committee was only able to conduct a two-week public consultation, which ran between 3 November 2025 and 17 November 2025. The consultation was based on the agreed terms of reference and received 34 responses. The Committee received a technical briefing from Welsh Government officials on 22 October 2025.

**7.** The Committee held oral evidence sessions with the Cabinet Secretary on 5 November 2025 and 20 November 2025.<sup>6</sup> The Committee also held a series of seven evidence sessions with external stakeholders between those dates, and engaged in targeted correspondence with several organisations. A full list of oral evidence sessions can be found at Annex A, and a list of consultation responses and additional written information can be found at Annex B.

**8.** The Committee is grateful to all those who took the time to provide evidence to inform its scrutiny, particularly in light of the short time available within which to do so.

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<sup>6</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, Record of Proceedings](#); [Economy, Trade and Rural Affairs Committee, 20 November 2025, Record of Proceedings](#) (“RoP”)



## Timetable for scrutiny

**9.** At seven sitting weeks, the timetable for Stage 1 scrutiny of the Bill's general principles was unusually short. Several witnesses cited the condensed timeframe as posing challenges to the quality of evidence that could be provided, and expressed concern about the level of scrutiny that could be afforded in the time available.

**10.** Of the shortened process, UKHospitality Wales said:

*"... we feel that the truncating of a process, understandably because of the term of Government, is not going to help us get the type of scheme that we want to see implemented".<sup>7</sup>*

**11.** The Short Term Accommodation Association ("STAA") stated their concern that:

*"... due to the timing of the Bill falling not long before national elections, it will be rushed through stages without allowing time for proper scrutiny. Already, the turnaround for evidence on the Bill has been very short and impeded a detailed consultation of members and additional data collection."<sup>8</sup>*

**12.** The National Residential Landlords Association ("NRLA") declined to submit detailed written evidence, stating that "the short window provided for consultation is, regrettably, insufficient for us to meaningfully canvass our membership and prepare a robust, evidence-based submission".<sup>9</sup>

**13.** Airbnb expressed strong concern about "the accelerated timeline for passage of the bill". They said:

*"These timelines feel excessively rushed, particularly given that the bill will introduce major legal obligations on VAPs, create a new framework which may restrict their ability to continue operating, impose criminal penalties for non-compliance, and apply a new regime on online platforms for enforcement that is out of keeping with international legal principles.*

*The impact on scrutiny is more important given that Welsh Government officials appear to be relying on the Senedd to*

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<sup>7</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 206

<sup>8</sup> Written evidence: DTRVA 23 – Short Term Accommodation Association

<sup>9</sup> Letter from the National Residential Landlords Association, 4 November 2025

*address some of the open questions and the uncertainties and unresolved issues stemming from loose drafting of the bill. One example of this is that when we raised serious issues about the feasibility and practicality of the WRA's suggestions around how platforms might confirm the validity of registration numbers, we were simply told that we should "take it to the Senedd".*<sup>10</sup>

**14.** The Cabinet Secretary noted that "the biggest consultation on any item in the programme for government was the manifesto on which the Government stood in an election. And the proposal to bring forward a licensing scheme was in the manifesto of my party".<sup>11</sup> He acknowledged that the Bill "comes right at the end of this parliamentary term", but noted "Governments have programmes for government, you have to phase them over the whole of the time available to you".<sup>12</sup>

## Other Committees' consideration of the Bill

**15.** The Senedd's Finance Committee took evidence from the Cabinet Secretary on the financial implications of the Bill on 13 November 2025.<sup>13</sup> The Senedd's Legislation, Justice and Constitution Committee took evidence from the Cabinet Secretary on matters within their remit on 10 November 2025.<sup>14</sup> Both committees have reported on their conclusions.

## Our view

We have found the short timetable for scrutiny of the Bill's general principles to be insufficient; it has restricted our ability to carry out the thorough and proper scrutiny usually afforded to non-emergency proposals for primary legislation. While we found the Welsh Government's approach to publishing a draft version of the Bill to be somewhat helpful in our preparations for scrutiny, it was not an appropriate substitute for a fuller timetable for Stage 1 consideration of the Bill's general principles. Moreover the Senedd's legislative scrutiny process should not be considered a substitute for a government's consultation and engagement with a sector on development of a Bill.

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<sup>10</sup> Written evidence: [DTRVA.12 - Airbnb](#)

<sup>11</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 15](#)

<sup>12</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 21](#)

<sup>13</sup> [Finance Committee, 13 November 2025](#)

<sup>14</sup> [Legislation, Justice and Constitution Committee, 10 November 2025](#)

We note the Cabinet Secretary's aim to carry through the commitments made in his party's manifesto, but we have been unable to find reference to licensing of visitor accommodation in that document. Further clarification on this point would be welcome. Nonetheless, we find the Welsh Government's commitment to bring forward this licensing scheme in its Programme for Government in 2021 difficult to reconcile with the short timeline allocated for the Senedd's legislative process.

We understand the frustrations felt by organisations who did not have time to submit thorough responses to our consultation. While we were able to take a relatively broad range of evidence in the time available to us, a longer timetable would have allowed stakeholders more time to develop considered responses to the Bill and our scrutiny to be more detailed. We believe this would have allowed the Committee to be more constructive in the legislative process and the formation of more robust legislation. The timetable afforded to this Bill should not be taken by future governments as a precedent for the making and scrutiny of non-emergency legislation, and such a short timeframe should be avoided unless exceptional circumstances demand otherwise.

**Conclusion 1.** The Committee regrets the short timetable allocated for Stage 1 scrutiny of the general principles of the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, and the negative effect this has had on the ability of stakeholders to contribute to the process.

**Recommendation 1.** Future Seneddau and governments should not take the timetable afforded to this Bill as a precedent for the making and scrutiny of non-emergency legislation. Such a short timeframe should be avoided unless exceptional circumstances demand otherwise.

## 2. Background and context

### The Bill's purpose and intended effect

**16.** The EM notes that the Bill “provides the legislative basis for a licensing scheme for visitor accommodation”. It adds that the purpose of the Bill “is to promote the development of tourism in Wales”.<sup>15</sup>

**17.** The Bill:

- restates and modernises the Welsh Ministers’ functions of promoting tourism in Wales, while requiring them to have regard to the potential social impact of tourism and its potential impact on the environment and the Welsh language;
- regulates the provision of visitor accommodation in Wales by introducing a licensing regime that initially focuses on self-catering accommodation, and seeks to align the standard of that accommodation more closely with corresponding standards already applicable to the private rented sector in Wales;
- makes a standard in relation to the fitness of visitor accommodation a contractual requirement; and
- establishes a directory of visitor accommodation for the purpose of providing information to the public about visitor accommodation in Wales.

**18.** The Bill also creates a code of Welsh law on tourism, incorporating the provisions of the Bill itself and those of the Visitor Accommodation (Register and Levy) Etc. (Wales) Act 2025 (“the VARL Act”). Subordinate legislation made in due course under the Bill or that Act will also form part of the Code.

**19.** The Cabinet Secretary told us:

*“The Bill is there to support development of tourism in Wales. [...] It aims to support the development of tourism through a licensing regime, in the first instance for self-catering and self-contained accommodation. It aims to develop that scheme in a way that is as simple and straightforward as possible, automating processes as*

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<sup>15</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), paragraphs 3.2 and 3.3

*much as we can, using contemporary forms of technology. It aims to align the registration requirements of the Visitor Accommodation (Register and Levy) Etc. (Wales) Act 2025 with the licensing requirements of this Bill. It aims to secure a proper balance between the needs of the industry and the communities within which the industry operates. It aims to create a more level playing field between the obligations on an individual who chooses to rent a property on a long-term or a short-term basis. It brings Wales into line with other UK nations in creating such a licensing scheme in order to provide reassurance to visitors. And it creates a code of tourism law for Wales, making the law more accessible, easier to understand and use, and available bilingually.”<sup>16</sup>*

## Background to the Bill

**20.** The Welsh Government’s Programme for Government committed to “take forward actions to... licence holiday lets”<sup>17</sup> and the Co-operation Agreement between the Welsh Government and Plaid Cymru included a commitment to “a statutory licensing scheme for holiday lets”.<sup>18</sup>

**21.** In December 2022, the Welsh Government launched a public consultation on proposals to introduce a statutory licensing scheme for all visitor accommodation providers in Wales. Three in-person consultation events were also arranged and took place in May 2023 involving 58 key stakeholders. The Welsh Government published a summary of responses to the consultation, along with a summary of the findings from the stakeholder events, in July 2023.<sup>19</sup>

**22.** The consultation document set out that one of the primary aims of a statutory licensing scheme is to “establish a level playing field for all visitor accommodation providers operating in the sector” and to address “concerns that certain parts of the sector do not meet or comply with their statutory obligations”.

**23.** The consultation also included proposals to create a comprehensive register of visitor accommodation providers. These proposals were taken forward and included as part of the VARL Act, which received Royal Assent on 18 September 2025.<sup>20</sup>

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<sup>16</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 7.

<sup>17</sup> Welsh Government – Programme for Government – Update, December 2021

<sup>18</sup> Welsh Government, The Co-operation Agreement, November 2021

<sup>19</sup> Welsh Government, consultation outcome: Statutory licensing scheme for all visitor accommodation providers in Wales, July 2023

<sup>20</sup> Visitor Accommodation (Register and Levy) Etc. (Wales) Act 2025

**24.** The EM notes that the most common overarching themes that emerged from the Welsh Government's December 2022-March 2023 consultation on a statutory licensing scheme were:

- *"The view that the proposed statutory licensing scheme would create significant administrative and financial burden;*
- *The suggestion that the visitor accommodation market is highly competitive and thus already operates efficiently; and*
- *General disagreement with any form of statutory licensing, without offering any further explanations for this view."*<sup>21</sup>

**25.** The Welsh Government also held three in-person consultation events with key tourism stakeholders in north, mid and south Wales in May 2023. The EM notes that at all three events there was:

*"... strong vocal opposition to the concept of licensing, with a clear preference for registration. [...] However, the idea of receiving a licence or a registration number to show compliance was welcomed, as well as being seen as a driver for participation."*<sup>22</sup>

## Policy context

**26.** In addition to the VARL Act, in the last few years the Welsh Government has made a number of policy decisions that affect the visitor economy, including:

- From April 2023, the minimum length of time that a self-catering property must be let in order to be liable to pay non-domestic rates (rather than council tax) increased from 70 days to 182 days (26 weeks) within any 12 month period. The property also needs to be available for let for at least 252 days (36 weeks) in a 12 month period.
- From April 2023, local authorities have had the powers to introduce higher discretionary council tax premiums on second homes and long-term empty properties - up to 300 per cent. From April 2025, 21 local

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<sup>21</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), paragraph 4.7

<sup>22</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), paragraph 4.13

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authorities have indicated they will charge a premium on either or both second homes and long-term empty properties.<sup>23</sup>

- In October 2022, three new use classes were introduced to give local planning authorities the ability to require planning permission to be obtained before changing the use of a primary residential property to a second home, short-term holiday accommodation or specific mixed-use property.<sup>24</sup> Cyngor Gwynedd was the first authority to make use of the new power.<sup>25</sup>
- Since April 2024, all businesses, public and third sector workplaces are required to separate recyclable materials in the same way as households.<sup>26</sup>

**27.** The EM refers to the responses received by the Finance Committee consultation on the VARL Bill, highlighting that “a number of respondents asked for the consideration of the cumulative impact of Government policy and world events when considering further intervention”.<sup>27</sup>

## Overview of the Bill

**28.** The Bill is made up of five parts, 60 sections, and two Schedules.

**29.** Part 1 gives an overview of the Bill and establishes that the Bill is intended to form part of a Code of Welsh law (together with the VARL Act).

**30.** Part 2 sets out the responsibilities of the Welsh Ministers in relation to the development of tourism in Wales.

**31.** Part 3 provides for the regulation of certain types of visitor accommodation in Wales, including through the introduction of a licensing scheme.

**32.** Part 4 establishes a directory of visitor accommodation in Wales and imposes requirements in relation to the advertising and marketing of visitor accommodation.

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<sup>23</sup> Welsh Government, [Council Tax on empty and second homes](#)

<sup>24</sup> Welsh Government, [Written Statement: Changes to planning legislation and policy for second homes and short-term lets](#), September 2022

<sup>25</sup> Cyngor Gwynedd, [Cyngor Gwynedd to introduce Article 4 Direction](#), July 2024

<sup>26</sup> Welsh Government, [Changes to workplace recycling: guidance for workplaces](#), July 2023

<sup>27</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), paragraph 4.20

- 33.** Part 5 sets out miscellaneous and general provisions, including in relation to the operation of the Bill in special cases.
- 34.** Schedule 1 makes amendments to the Development of Tourism Act 1969.
- 35.** Schedule 2 makes amendments to the Visitor Accommodation (Register and Levy) Etc. (Wales) Act 2025 (“the VARL Act”) and the Tax Collection and Management (Wales) Act 2016.

### 3. General principles and the need for legislation

#### General principles of the Bill

**36.** In accordance with Standing Order 26.10, the Committee's role is to consider the general principles of the Bill and report to the Senedd in order to inform decisions about whether the Bill should proceed to the next stages of the legislative process.

**37.** There was broad support among witnesses for the general principles of the Bill, however many expressed concern about the detail of its implementation, with some suggesting that it has been "rushed" through.<sup>28</sup>

#### Box 1: Examples of views on the general principles of the Bill<sup>29</sup>

"I agree with the policy intentions, and welcome the improvements." (Martyn Brookes, DTRVA 08)

"We agree with the policy intention and welcome the bill. Standardisation of quality and safety will increase visitor confidence. As holiday accommodation owners that have painstakingly followed all legislation and guidance at considerable cost over the past 15 years, it has long been a frustration of ours to see other sub par accommodation offering stays at below cost rates." (Beach View Cottages, DTRVA 09)

"Electrical Safety First considers that this bill will provide enhanced safety and reassurance for guests and owners, reduce the risk to properties from accidental electrical fires, improve the quality of Welsh housing stock and protect the reputation of the Welsh Tourism industry." (Electrical Safety First, DTRVA 11)

"A licensing scheme would not result in an increase in standards as booking platform reviews are the key drivers for customers booking holiday accommodation." (CLA Cymru, DTRVA 17)

"The Club supports the objective of the Bill which seeks to ensure that visitor accommodation meets minimum standards and offers visitors the confidence in regulated premises, as well as supporting sustainable tourism by balancing the economic and cultural benefits of tourism alongside the pressures it places

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<sup>28</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025. RoP, paragraph 24

<sup>29</sup> Responses may be found in full on the [consultation website](#)

on local communities and infrastructure.” (Caravan and Motorhome Club, DTRVA 19)

“Visit Pembrokeshire supports the Welsh Government’s aim of ensuring a safe, fair, and transparent tourism accommodation sector. However, success will depend entirely on the scheme’s *practical implementation*. The system must be designed to work with the industry - not against it.” (Visit Pembrokeshire, DTRVA 31)

**38.** North Wales Tourism said:

*“Our members overwhelmingly recognise the potential benefits of a well-designed scheme, including improved guest safety, raised quality standards, and a more professional sector. Mandatory requirements for fire risk assessments, smoke and CO alarms, electrical and gas inspections, and public liability insurance would enhance visitor confidence and level the playing field, particularly for established businesses already complying with such standards.”<sup>30</sup>*

**39.** However, they warned that additional administrative burdens risk “reducing accommodation supply, especially in rural areas, and driving informal providers out of the market”.

**40.** FSB Wales said they were, in principle, “supportive of providing a level playing field that is fair for businesses that comply with regulations.”<sup>31</sup>

**41.** The National Trust also supported the provision of a level playing field, noting that this “provides reassurance to guests that they are staying in a safe environment.”<sup>32</sup>

**42.** According to the British Holiday and Home Parks Association (“BH&HPA”) the Bill “represents a proportionate and well-structured approach to improving oversight of visitor accommodation”.<sup>33</sup>

**43.** Cymdeithas yr Iaith welcomed the introduction of the Bill, saying “it will be of assistance in implementing measures such as Article 4 orders, as well as regulating holiday accommodation”. They added that “communities need a

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<sup>30</sup> Written evidence: [DTRVA 25 - North Wales Tourism](#)

<sup>31</sup> Written evidence: [DTRVA 01 - FSB Wales \(Federation of Small Businesses\)](#)

<sup>32</sup> Written evidence: [DTRVA 02 - National Trust](#)

<sup>33</sup> Written evidence: [DTRVA 21 - British Holiday & Home Parks Association](#)

greater say in tourism and holiday developments, given that they have a significant impact on communities.”<sup>34</sup>

**44.** The WLGA agreed with the Bill’s general principles. They said:

*“There’s clearly synergy with the proposals around the visitor levy full stop, and I think there’s a complementarity in having a licence scheme for short-term lets. I think it’s also about standards and ensuring that there are high standards provided in the industry.”<sup>35</sup>*

**45.** The WLGA noted that licensing “makes regulation of a sector so much easier.” They added:

*“What you’re able to do is to have a really good relationship with, in this case, the accommodation provider, because they have asked for your involvement, made an application. So, that relationship is so much better from the start, and the outcomes then are more productive.”<sup>36</sup>*

**46.** Swansea Council noted their support for the Bill’s general principles and added: “success depends on a streamlined application process, affordable fees, and robust communication to avoid placing undue burden on small operators.”<sup>37</sup>

**47.** However, the Short-Term Accommodation Association (“STAA”) suggested the Bill “needs significant refinement for it to be supported by the sector”.<sup>38</sup>

**48.** Mid Wales Tourism (“MWT Cymru”) noted their support for “the *intent* of the Bill”, but added “we have major concerns about its *practical implementation*”.<sup>39</sup> They highlighted their support in principle for fair licensing “to ensure safety, transparency, and consistency across all providers”, and for “a national framework rather than fragmented local schemes”.

**49.** The NRLA said that the impact of the Bill is likely to be most profound in areas where significant investment in short-term lets has reduced the availability of long-term rented homes. The NRLA suggested that “addressing this imbalance

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<sup>34</sup> Written evidence: [DTRVA 13 – Cymdeithas yr Iaith](#) (translation provided by Senedd Cymru)

<sup>35</sup> [Economy, Trade and Rural Affairs Committee, 13 November, RoP, paragraph 10](#)

<sup>36</sup> [Economy, Trade and Rural Affairs Committee, 13 November, RoP, paragraph 11](#)

<sup>37</sup> Written evidence: [DTRVA 34 – Swansea Council](#)

<sup>38</sup> Written evidence: [DTRVA 23 – Short Term Accommodation Association](#)

<sup>39</sup> Written evidence: [DTRVA 26 – MWT Cymru \(Mid Wales Tourism\)](#)

is an important step toward improving affordability and access for local residents”.<sup>40</sup>

**50.** Airbnb opposed the Bill and called for its withdrawal, suggesting that “licensing to regulate health and safety is a blunt and unnecessary tool that is grossly disproportionate to the potential risks faced by guests.”<sup>41</sup>

## **The need for legislation**

**51.** The EM suggests that in some communities, it is likely that the tourism sector “is having a direct impact on the availability of housing for local people, with properties leaving the residential market to become visitor accommodation”.<sup>42</sup>

**52.** The EM also suggests that, without a licensing regime for visitor accommodation,

*“... there is a significant risk that the short-term let sector will continue to expand in a way which exacerbates the market distortions already reported, with some accommodation providers - either unknowingly or deliberately - failing to meet regulatory standards, therefore able to operate at lower cost than providers who understand and invest in complying with the current regulatory regime”.*<sup>43</sup>

**53.** The EM further states that there is “also a risk that the impacts on communities become more pronounced.”<sup>44</sup>

**54.** The NRLA supported these aims of the Bill:

*“... we welcome the Welsh Government’s intention to level the playing field between the short-term let market and the private rented sector. We support the introduction of minimum safety and quality standards for visitor accommodation, which we believe will help ensure consistency and confidence across short- and long-term rented housing.*

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<sup>40</sup> [Letter from the National Residential Landlords Association, 4 November 2025](#)

<sup>41</sup> Written evidence: [DTRVA 12 - Airbnb](#)

<sup>42</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), paragraph 10.16

<sup>43</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), paragraph 3.35

<sup>44</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), paragraph 3.39



*We also note that the impact of the Bill is likely to be most profound in areas where significant investment in short-term lets has reduced the availability of long-term rented homes. Addressing this imbalance is an important step toward improving affordability and access for local residents.”<sup>45</sup>*

**55.** Propertymark also noted that it “cautiously supports the Bill’s aim to better align the regulation of self-catering visitor accommodation with that of the private rented sector, recognising the importance of addressing concerns about the loss of long-term rental housing to short-term lets.”<sup>46</sup>

**56.** Scotland’s Association of Self-Caterers and the Scottish Tourism Alliance warned of the importance of the Bill having one clear objective. Scotland’s Association of Self-Caterers said:

*“... without a clear purpose and policy objective, Wales risks doing exactly what Scotland’s done, and it’s harming the wrong people and regulating the wrong thing”.<sup>47</sup>*

**57.** The Cabinet Secretary confirmed that the Bill’s primary purpose is to “promote the development of tourism here in Wales”. However, he added:

*“But as I think I’ve been clear on throughout, tourism cannot thrive in Wales in the way we want it to without attending to the needs of those communities in which it is concentrated. There’s a symbiotic relationship between the future of the industry and the future of those communities, and there is no doubt that the very rapid growth in self-contained accommodation has in some places meant that houses that would previously have been available for long-term letting have now become available only for short-term letting, meaning that people who live in those communities, who give them their character and make them the sorts of places that people want to visit, are no longer as able to remain in those communities as they otherwise would have been. So, there is a housing purpose.”<sup>48</sup>*

**58.** Several witnesses suggested that a licensing scheme was unnecessary, and that the register established through the VARL Act could have achieved the same

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<sup>45</sup> [Letter from the National Residential Landlords Association, 4 November 2025](#)

<sup>46</sup> [Written evidence: DTRVA 28 – Propertymark](#)

<sup>47</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 277](#)

<sup>48</sup> [Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 404](#)

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objectives. Awaze noted its commitment to ensuring that short term rentals are operated lawfully, but questioned, if the scheme is to ensure all owners are meeting the specified standards, “why this could not instead be achieved by adapting the Registration Scheme to allow document uploads”.<sup>49</sup>

**59.** Airbnb suggested “the registration scheme will allow the Welsh Government to achieve pretty much all of the things that it is trying to do with this Bill”, adding:

*“It will provide local authorities and enforcement bodies with where the short-term lets are and who’s operating them. It will allow hosts and accommodation providers to be signposted to information about their health and safety obligations and to attest that they understand and follow them.”<sup>50</sup>*

**60.** However, the WLGA noted:

*“A register on its own doesn’t give you the power to inspect and check standards within the property. A licensing scheme does allow you to do that, and it comes with all the sanctions that a licensing scheme has then as well.”<sup>51</sup>*

## **Evidence base and timing of the Bill**

**61.** The EM notes that some respondents to the Finance Committee’s consultation on the VARL Bill, including Airbnb, “suggested that the register should be implemented prior to any decisions being made to introduce a licensing scheme”.<sup>52</sup>

**62.** The EM also acknowledges the limitations in the data available to evidence the need for the Bill, namely:

- “The obvious challenge in estimating the size of the sector is the paucity of reliable data currently available regarding both the number of self-catering lets available in Wales and the number of operators responsible for that accommodation”.
- “Precise data on the number of short-term lets in Wales is not available”.

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<sup>49</sup> Written evidence: DTRVA 14 - Awaze

<sup>50</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 52

<sup>51</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 13

<sup>52</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, Explanatory Memorandum, 4.19

- “There is currently no data available on the characteristics of premises or levels of compliance with the existing statutory obligations”.
- The EM refers to “anecdotal non-compliance” with the existing statutory requirements and states: “We have heard anecdotal reports that there is now inconsistent compliance with regulatory standards across the self-catering sector in particular”.

**63.** The STAA said it was “concerned by a tendency to present assumptions and anecdotal evidence about the impact of STRs on housing availability as fact in the Explanatory Memorandum”.<sup>53</sup>

**64.** In terms of “anecdotal non-compliance” with existing standards, Mid and West Wales Fire and Rescue Service noted that:

*“While we do not possess a formal dataset to quantify this, our experience suggests that there are indeed inconsistencies in fire safety awareness and compliance among smaller accommodation providers”.*<sup>54</sup>

**65.** Several witnesses raised concerns about the timing of the Bill’s introduction. The STAA said they found it “premature to introduce a licensing scheme for visitor accommodation before the registration scheme, which has already been legislated for, is implemented and data from it could be used to ensure policy development is evidenced and proportionate.”<sup>55</sup>

**66.** South Wales Fire and Rescue Service said:

*“The proposed licensing regime provides an opportunity to improve data collection and understanding of fire safety risks within the sector. However, without a strong evidence base at the outset, there is a risk that the framework may not be fully proportionate or targeted to actual risk levels.”*<sup>56</sup>

**67.** In terms of data, the Cabinet Secretary argued:

*“I think the limitations in the data are more about its specificity than they are about the general patterns that the data reveals. Because, yes, there are lots of different estimates of how much self-contained accommodation there is, how many people visit*

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<sup>53</sup> Written evidence: [DTRVA 23 – Short Term Accommodation Association](#)

<sup>54</sup> Written evidence: [DTRVA 29 – Mid and West Wales Fire and Rescue Service](#)

<sup>55</sup> Written evidence: [DTRVA 23 – Short Term Accommodation Association](#)

<sup>56</sup> [Letter from the South Wales Fire and Rescue Service, 14 November 2025](#)

*it, and so on—different surveys give you different answers—and that does make construction of the regulatory impact assessment particularly challenging in some ways, but the underlying patterns in almost all of the data tell you the same story.”<sup>57</sup>*

**68.** The Cabinet Secretary added:

*“... the register is what will solve the data problems for us, because when we have a register—and the register will be completed, we think, in 2027—we will have a completely different level of knowledge and assurance about who owners are, where accommodation is to be found, and so on. All of that will be available before this Bill, if it succeeds at Stage 1, and then further in the process of Senedd scrutiny, if this Bill reaches the statute book at the very end of the Senedd term, its operational impact, and some of the operational detail through regulation, will not happen until after the register is complete.”<sup>58</sup>*

**69.** Witnesses also raised concerns about a “cumulative” impact on businesses, following recent policy and legislative changes. North Wales Tourism noted that among its members:

*“... significant concerns persist regarding the cumulative regulatory burden on an industry already facing unprecedented challenges. In the last 36 months, tourism businesses have navigated multiple new stipulations amid a cost-of-living crisis, with hospitality in areas like Caernarfon reporting at least 30% downturns compared to previous years.”<sup>59</sup>*

**70.** FSB Cymru agreed with the notion of a “cumulative effect”, and added:

*“... on that partnership approach that the explanatory memorandum says is the aim in developing the tourism sector, and having the partnership from Government with the sector, it*

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<sup>57</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025. RoP, paragraph 40

<sup>58</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025. RoP, paragraph 41

<sup>59</sup> Written evidence: DTRVA 25 - North Wales Tourism

*has felt for the sector slightly like it's being 'done to', rather than being 'done with'."*<sup>60</sup>

**71.** UKHospitality Wales noted comments from the Professional Association of Self-Caterers ("PASC") that "the strain is now showing on their businesspeople." They highlighted:

*"They're mainly microbusinesses. The majority of self-catering owners in Wales are female—about 53 per cent—and over 60 years old, and two thirds of the owners live within 10 miles and more than half live next door to the properties that we're talking about. So, you can get a picture of the types of businesses that are involved and the amount of resource that they've got to be able to run a business."*<sup>61</sup>

**72.** Visit Pembrokeshire said that operators were feeling "pretty battered and worn down, very anxious." They added:

*"... when we're introducing this Bill, we really do need to try and make it as simple as possible and all-inclusive."*<sup>62</sup>

**73.** Witnesses including FSB Cymru and STAA agreed that communication would be important. North Wales Tourism said:

*"... there is a cumulative impact just of the sheer volume of legislation to get our heads around and the importance of getting clear messaging and clarity."*<sup>63</sup>

**74.** The Cabinet Secretary acknowledged that "this has been a relatively busy period for the sector in terms of policy changes and legislative changes" but noted that the changes "have been a response to the rapidly changing nature of the industry". He explained:

*"So, lots of what we have done during this Senedd term is to try to help the industry find that balance, where it has a harmonious relationship with the communities that it depends on, and very often those communities depend on tourism as well."*<sup>64</sup>

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<sup>60</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 245

<sup>61</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 249

<sup>62</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 233

<sup>63</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 422

<sup>64</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 38

**75.** Several witnesses expressed concern that they had not had the opportunity to feed into the Bill's development, and suggested the Bill had been rushed. Booking.com stated that "genuine concerns within the drafting of the Bill have already been raised", but there "hasn't been that ability to make any amendments before it then reaches the Senedd, which I think shows the kind of speed here."<sup>65</sup>

**76.** Travel Chapter said:

*"... the rush to introduce the Bill, with a large number of delegated powers, will not ensure it has sufficient scrutiny or tightness to achieve the stated policy intention without a significant risk of scope creep".<sup>66</sup>*

**77.** Wales Tourism Alliance ("WTA") noted:

*"As an industry, we're behind this part of the legislation, and we want to get it right. If we can't get it right and we're rushing it, then we're going to end up with something that isn't going to work properly, possibly, and we're going to have to come back and review it, and I don't think that's good for anyone."<sup>67</sup>*

**78.** Awaze suggested that by following an expedited process, "there is considerably less time for owners and platforms to understand their obligations under the Bill and implement compliance processes, significantly increasing the risk of noncompliance and diluting the effectiveness of the Bill."<sup>68</sup>

**79.** The Cabinet Secretary did not agree that the Bill has been "rushed", noting that "it has been five years in the making".<sup>69</sup>

**80.** Responding to whether it would have been beneficial to consult on a draft Bill, the Cabinet Secretary said that "where this Bill comes in the timetable means that it's simply not feasible to have a draft Bill". He added:

*"I think it's important to say that there has been consultation on these proposals not just in the 2023 consultation to which you referred; there's been consultation in every single year of this term. [...] So, I think the second reason why the case for a draft Bill is less compelling in this case, as well as the timetabling*

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<sup>65</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 21

<sup>66</sup> Written evidence: DTRVA.18 – Travel Chapter

<sup>67</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 209

<sup>68</sup> Written evidence: DTRVA.14 – Awaze

<sup>69</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 406



*issues, is that the issues have been so very well rehearsed over a five-year period.”<sup>70</sup>*

## Licensing in other countries

**81.** The Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2022 was passed by the Scottish Parliament on 19 January 2022 and came into force on 1 March 2022.<sup>71</sup>

**82.** The licensing scheme applies to the whole of Scotland and is implemented by individual local authorities which act as the licensing authority. Since 1 October 2022, new hosts and operators must obtain a licence before they can accept bookings or receive guests.

**83.** To obtain a licence, accommodation providers must meet specific conditions including safety standards, public liability insurance, a fit and proper person test, and the payment of the required fee. A licensing authority can refuse to consider an application if it looks like planning permission is needed and has not been secured. Licensing authorities can also set additional conditions to address local circumstances or concerns.

**84.** The maximum duration for a first licence is three years. Licensing authorities may grant renewals for a longer period. Licensing authorities have nine months from the date on which the application was made to consider and determine each application.

**85.** In summer 2024, the Scottish Government published an update report on the implementation of the short-term let regulations, based on stakeholder feedback.<sup>72</sup> Some of the key points from the report include:

- Prior to licensing the Scottish Government “did not have reliable data about the number of short-term lets in Scotland”. They now have ‘provisional and partial’ official statistics on the number and characteristics of short term let licensing applications.
- The Scottish Government considers it is “too early to assess any impact of the licensing scheme given the short period of time the scheme has

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<sup>70</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraphs 21-22](#)

<sup>71</sup> [Legislation.gov.uk: The Civic Government \(Scotland\) Act 1982 \(Licensing of Short-term Lets\) Order 2022](#)

<sup>72</sup> Scottish Government, [Short-Term Let Licensing Implementation Update Report 2024](#), August 2024

been in place”. The report also notes Brexit, the Covid pandemic and the fiscal environment as potential ongoing impacts.

**86.** The Scottish Tourism Alliance spoke about their experiences of the Scottish licensing scheme, which they warned had resulted in “some fall away from accommodation stock, which is in demand still, a creation of a black-market product, and, obviously, it’s forced price, as well, in the wrong direction for the visitor”.<sup>73</sup>

**87.** In terms of lessons learned from other legislatures, the Cabinet Secretary said: “I think in a way the clearest lesson from experience elsewhere is that this is something that everybody is going to do.” He added:

*“I think there are specific lessons that we have learnt from the Northern Irish and the Scottish experience—sometimes very positive lessons. We’ve learnt from the things they’ve done well. Some things we’ve decided to do differently. So, in the Northern Irish context, to get a licence, every premises has to have a physical inspection. That is resource intensive, and it means that the process is a long one. The Northern Ireland Executive are consulting at the moment on a move away from that regime to what they refer to as a sort of intelligence-led form of operation, and our Bill is much closer to that.*

*[...]*

*Scotland has a locally based scheme, so it’s up for each local authority to run their own licensing regime. I visited Edinburgh within the last 12 months to talk to them about their visitor levy Bill, which also operates on a local authority basis, and one of the things that they said to me that the industry was telling them was that they thought there would be advantages in a national scheme where the rules are the same everywhere”<sup>74</sup>*

## Unintended consequences

**88.** The National Trust suggested that:

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<sup>73</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025. RoP, paragraph 256

<sup>74</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025. RoP, paragraphs 25-26

*“Some providers may choose to go under the radar to avoid the scheme, only advertising on social media or promoting to repeat guests.”<sup>75</sup>*

**89.** This was echoed by Travel Chapter, who said that “there is a very real risk of a rise in the Black Market”.<sup>76</sup>

**90.** MWT Cymru warned:

*“The definitions, data requirements, and system architecture as proposed could unintentionally impose significant administrative and financial burdens on businesses and not-for-profit DMOs. If not implemented carefully, this could disrupt destination marketing, reduce visibility for Welsh businesses, and undermine the regional tourism economy.”<sup>77</sup>*

**91.** The WLGA suggested that the scheme “could have unintended consequences for smaller short-term let providers as compliance costs may deter small-scale operators, reducing accommodation diversity”. The WLGA highlighted that some householders let their properties or a room within their property at times of great demand, for example around sporting events or the Royal Welsh Show. The WLGA noted that this can serve “precious accommodation needs”, especially in a rural area “where such accommodation is sparse”.<sup>78</sup>

**92.** An individual responding to the consultation noted their view that “Prices will go up. Some small providers will be excluded as it will be too admin heavy to bother with.”<sup>79</sup>

**93.** Beach View Cottages, while noting their support for the general principles of the Bill, suggested that as written the Bill might cause the number of properties to decline, “thus diminishing visitor numbers to attractions and eateries, and impact local service providers that owners rely on (cleaners, maintenance people, electricians, plumbers, gardeners .....).”<sup>80</sup>

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<sup>75</sup> Written evidence: [DTRVA.02 - National Trust](#)

<sup>76</sup> Written evidence: [DTRVA.18 – Travel Chapter](#)

<sup>77</sup> Written evidence: [DTRVA.26 – MWT Cymru \(Mid Wales Tourism\)](#)

<sup>78</sup> Written evidence: [DTRVA.22 - Welsh Local Government Association \(WLGA\)](#)

<sup>79</sup> Written evidence: [DTRVA.07 - Individual](#)

<sup>80</sup> Written evidence: [DTRVA.09 - Beach View Cottages](#)

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**94.** The Cabinet Secretary said, “the impact on the supply of accommodation will be marginal” and his belief is that “the number of people who will leave the industry as a result of this bill is very, very small”.<sup>81</sup>

**95.** In terms of a potential growth in a black market of visitor accommodation, the Cabinet Secretary considered the situation in Scotland to be different to that in Wales. He said:

*“I just think the visibility of the scheme means that the chances of you being able to operate under the radar in Wales, when you’ve got to be registered and you’ve got to have a licence, and people who live nearby will be able to find the evidence as to whether you are actually doing that, I actually think it’ll be very difficult for that to happen.”<sup>82</sup>*

## **Subordinate legislation**

**96.** The Bill contains 20 powers for the Welsh Ministers to make regulations in a number of areas and one power to make commencement orders (in section 59(2)). The regulation-making powers are summarised in Table 51 of the EM<sup>83</sup>.

**97.** The Bill also provides the Welsh Ministers with powers to issue a code of practice (section 3) and statutory guidance (section 55). These powers are summarised in Table 5.2 of the EM<sup>84</sup>.

**98.** The National Trust expressed concern about regulations being made without involvement of the industry:

*“Many of the items in Chapter 5 seem to allow for decisions to be made without industry consultation. This should not be the case. The industry knows what is happening on the ground and should be consulted about future changes to ensure the changes are reasonable, workable and not detrimental to providers or guests.”<sup>85</sup>*

**99.** This concern was echoed by ScoutsCymru, who noted:

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<sup>81</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 150](#)

<sup>82</sup> [Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 550](#)

<sup>83</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), pages 27-36

<sup>84</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), page 37

<sup>85</sup> Written evidence: [DTRVA.02 - National Trust](#)

*“... we are concerned and cautious about the conferment of power via regulations set out within the bill, particularly the ability for Ministers to specify additional types of regulated visitor accommodation as set out in Part 1: Chapter 5(1)(b) of the Explanatory Memorandum. While we understand the need for Senedd approval does enable further consideration of the implications, the lack of reference to a consultation with stakeholders who may be affected, could result in unintended, negative consequences.”<sup>86</sup>*

**100.** Airbnb was also critical of the Bill’s provision for subordinate legislation, saying it “gives the Welsh Government too much discretionary power to alter or vary the scope of the scheme.” They highlighted in particular powers to expand the scope of the Bill to other accommodation types, and the provision for training.

**101.** Swansea Council considered the powers to make subordinate legislation to be “appropriate”, adding that “Flexibility is necessary to adapt standards and processes over time, but changes should be subject to scrutiny to maintain fairness and proportionality.”<sup>87</sup>

**102.** Sykes Holiday Cottages suggested that the number of delegated aspects of the scheme is “likely due to the constricted timetable” and “risks huge change to the costs or scope without appropriate scrutiny”, causing greater uncertainty for the industry.<sup>88</sup>

**103.** North Wales Holiday Cottages stated:

*“Welsh Government officials themselves have admitted in meetings that part of the reason why there’s so much secondary legislation is because they haven’t had time to actually sort out the details themselves.”<sup>89</sup>*

**104.** However, the Cabinet Secretary argued that there are “always things that you have to concede when the guillotine comes down on a Bill.” He added:

*“... there will be some things, which I’ve already discussed in front of other committees, that we will bring forward as Stage 2*

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<sup>86</sup> Written evidence: [DTRVA.06 - ScoutsCymru](#)

<sup>87</sup> Written evidence: [DTRVA.34 - Swansea Council](#)

<sup>88</sup> Written evidence: [DTRVA.15 - Sykes Holiday Cottages](#)

<sup>89</sup> [Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 24](#)

*amendments, but that is not a unique position in this Bill; it's just the nature of the way legislation is made.*"<sup>90</sup>

## Financial implications

**105.** The cost of the Bill is estimated to be £41.84m over a 10-year period (2026-27 to 2035-36), comprised of:

- £9.46m in administrative costs, all of which will be met by the Welsh Government, consisting of £9.16m of transitional costs and £0.3m of recurrent spending. The transitional costs include the development costs for a digital system, estimated as £3.93m. The EM states that the Welsh Government "will examine the scope to reduce these costs through the use of Artificial Intelligence and synergies with registration of visitor accommodation".
- £32.37m in compliance costs to be met by visitor accommodation providers, based on the estimate of there being 30,000 premises that fall within the initial scope of the Bill. However, the EM notes that "the main uncertainty in developing the cost estimates is the paucity of reliable data on the number of self-catering lets available in Wales".<sup>91</sup>

**106.** The EM states: "it is assumed that whilst some visitor accommodation providers may choose to pass on some or all of these costs to visitors via increased charges, others may prefer to absorb them and accept reduced profit margins, although it is not possible to estimate the proportion in either case".<sup>92</sup>

**107.** The EM adds "it is not possible to predict what proportion of providers might prefer to leave the market rather than comply with statutory requirements".<sup>93</sup>

**108.** Sykes Holiday Cottages accepted the "Government is trying to keep the costs down" but suggested that "the estimates are wildly unrealistic".<sup>94</sup> Despite agreeing that the estimates are "unrealistic", PASC also noted their belief that the Welsh Government "have listened to our concerns in this area and the cost are stated in good faith".<sup>95</sup>

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<sup>90</sup> [Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 406](#)

<sup>91</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), Regulatory Impact Assessment summary

<sup>92</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), Regulatory Impact Assessment summary

<sup>93</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), Regulatory Impact Assessment summary

<sup>94</sup> Written evidence: [DTRVA.15 – Sykes Holiday Cottages](#)

<sup>95</sup> Written evidence: [DTRVA.16 – Professional Association of Self-Caterers UK Cymru](#)

**109.** CLA Cymru noted:

*“The assessment found that the cost of compliance, combined with other factors currently affecting the viability of maintaining a visitor accommodation business, may cause some VAPs to exit the market thus reducing the number of available premises for visitors to occupy.”<sup>96</sup>*

**110.** Travel Chapter suggested “the reference to public liability policies typically costing £200-£300 does not fit with our understanding of the market for robust policies specifically designed for short term rentals.”<sup>97</sup> The STAA agreed that the estimates are “very light”,<sup>98</sup> and later noted that “a typical policy for a holiday let that includes public liability cover would be closer to £500 per property, so potentially double what the estimate is in the impact assessment.”<sup>99</sup> They said:

*“We need to consider that the scheme won’t work as efficiently and seamlessly as maybe has been presented. So, we do certainly think the costs are going to be significantly higher.”<sup>100</sup>*

**111.** The Cabinet Secretary said “not all of those costs are what you might think of as real costs. Some of them are opportunity costs. People will have to spend some time uploading the certificates and so on, and they could be doing [...] something else with that time, so we have to cost that into the RIA.” He added:

*“The single biggest figure in that is the assumption that we have made in relation to the one of the five requirements that is not at the moment an obligation, and that is public liability insurance. So, we’ve made assumptions about the percentage of businesses that have it already. We assume about 50 per cent.”<sup>101</sup>*

## Human rights implications

**112.** The Welsh Government’s commentary on human rights in the EM states:

*“The Bill’s provisions have been carefully assessed, and we are satisfied that they are compatible with the European Convention on Human Rights. This has included consideration*

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<sup>96</sup> Written evidence: [DTRVA.17 - Country Land and Business Association \(CLA Cymru\)](#)

<sup>97</sup> Written evidence: [DTRVA.18 - Travel Chapter](#)

<sup>98</sup> Written evidence: [DTRVA.20 - Short Term Accommodation Association](#)

<sup>99</sup> [Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 500](#)

<sup>100</sup> [Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 511](#)

<sup>101</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraphs 154-156](#)



*of Article 1 Protocol 1 (protection of property), Article 6 (right to a fair trial) and Article 8 (right to respect for private and family life)."*<sup>102</sup>

**113.** The equality impact assessment for the Bill was published on 7 November 2025.<sup>103</sup> A summary of the Welsh Government's human rights assessments in relation to the Bill is set out at pages 11 – 13 of the equality impact assessment.

**114.** The STAA argued that "there is not sufficient detail" as to how the Welsh Government's conclusion on the Bill's compatibility with the European Convention on Human Rights was reached, and suggested that elements of the Bill, including the process for licence renewal, "might risk affecting the Bill's compatibility [...] particularly Article 1 Protocol 1."<sup>104</sup>

**115.** The Association of Scotland's Self-Caterers and the Scottish Tourism Alliance also warned that the Welsh Government could face Article 1 Protocol 1 ("A1P1") challenges if they introduce universal annual licensing, non-transferable licences, or barriers that prevent businesses continuing to trade.<sup>105</sup>

**116.** The Cabinet Secretary noted:

*"one of the first things a Minister has to be satisfied about in bringing forward a Bill is that it is compliant with human rights obligations, and I will have had a significant amount of advice on a range of articles that give me confidence that the Bill is compliant in that way."*<sup>106</sup>

**117.** In the context of the powers of entry and inspection in the Bill, he outlined "four different steps that the Bill sets up to make sure that compliance is there".<sup>107</sup>

## Post-implementation review

**118.** The licensing scheme is intended to go live in 2028-29, with the training and system available to providers by autumn 2028, and the scheme in full operation by spring 2029.

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<sup>102</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, Explanatory Memorandum, paragraph 10.11

<sup>103</sup> Welsh Government, Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill: equality impact assessment, November 2025

<sup>104</sup> Written evidence: DTRVA 20 – Short Term Accommodation Association

<sup>105</sup> Written evidence: DTRVA 24 – Association of Scotland's Self-Caterers and Scottish Tourism Alliance

<sup>106</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 425

<sup>107</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraphs 425-427

**119.** According to the EM, the Welsh Government is developing a “detailed implementation plan to operationalise” the licensing scheme, which will include a post implementation review of the scheme delivered by the Bill.<sup>108</sup>

**120.** The Welsh Government will “conduct the post implementation review no later than five years after the legislation has come into force” and “it is expected that the formal review process will commence once the scheme has been in place for a year”.<sup>109</sup> There is no provision on the face of the Bill in relation to a post-implementation review.

**121.** The Cabinet Secretary told us:

*“I myself do not think that it is a sensible approach, in making legislation, to make something obligatory that Governments are going to do anyway. ... I think, myself, a mature approach to legislation is that you put things on the face of the Bill where you need to be confident you need to do that to secure an outcome. I’m making a commitment now that there will be a post-implementation review on the terms set out in the explanatory memorandum. You don’t need it on the face of the Bill to secure that.”<sup>110</sup>*

## Our view

### General principles of the Bill

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We recognise the broad consensus from witnesses regarding what the Bill is setting out to achieve. Most concerns focused on the detail of its intended implementation, and the perceived lack of planning and engagement with the sector on the Bill’s development. Many witnesses appear to have been taken off-guard by the Bill’s introduction, however we heard during the course of our scrutiny that the Welsh Government is in discussions with organisations on the detail of the Bill. It is vital that this work should continue to ensure that, by the time the Bill is implemented, its provisions are clarified and understood for the sector. It is also key that the sector is fully involved in the future development of implementation plans and secondary legislation under the powers proposed in the Bill.

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<sup>108</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), paragraph 11.1

<sup>109</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), paragraph 11.2

<sup>110</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 170](#)

While we note comments made that a Bill cannot work unless its objective is clear, we are satisfied that the Cabinet Secretary is focused on this Bill's primary purpose in promoting the development of tourism in Wales. We acknowledge also his comments about the importance of the impact of tourism on local communities, and the symbiotic relationship between the two. Tourism is a crucial element of the Welsh economy and this Bill, together with the Visitor Accommodation (Register and Levy) etc. (Wales) Act, should serve to strengthen the sector, the quality on offer to visitors, their confidence in Wales' standards, and the benefits that can be brought to local communities.

Having considered the evidence presented to us, we have concluded that, on balance, and taken in its entirety, we support the general principles of the Bill. However, one Member noted reservations over bringing forward the register and licensing at the same time, and another Member noted concern that the political narrative is driving the Bill, rather than the imperative to get it right.

It is evident that there are a number of areas on which further consideration and clarification by the Welsh Government are necessary. This report details our scrutiny of the provisions within the Bill and our subsequent recommendations, which we believe are needed to strengthen this legislation. A number of our recommendations call for additional clarity from the Welsh Government, which is indicative of the timetable within which we were working as well as the level of detail presented on the face of the Bill and within its accompanying documents.

Given the current uncertainty regarding aspects of the policy proposed in the Bill, the limitations in the available data and the early stage of development of plans for its implementation, we consider that a future Senedd should have a role in scrutinising the Welsh Government's continued policy development in connection with the licensing scheme. To guarantee this, the commencement of the licensing provisions in the Bill should be subject to the approval of the next Senedd.

Further, we note that the Bill is expected to be implemented from 2029. To ensure that the statutory licensing proposals remain fit for their intended purpose, we believe that commencement of these provisions should occur no later than the end of the next scheduled Senedd term. If the Welsh Government is unable to implement the licensing scheme by that stage, then fresh proposals should be brought before the Senedd in the form of a new licensing Bill, if required.

**Recommendation 2.** The Committee recommends that the Senedd, taking into account the recommendations in this report, agrees the general principles of the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill.

**Recommendation 3.** The Welsh Government should amend the Bill at Stage 2 to make commencement of the licensing scheme subject to further Senedd approval.

**Recommendation 4.** The Welsh Government should amend the Bill at Stage 2 to ensure that commencement of the Bill's provisions can take place no later than the end of the next scheduled Senedd term.

### **Evidence base and timing of the Bill**

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A lack of data was recognised by almost all who contributed to our evidence gathering, including the Cabinet Secretary, although he pointed out that this information will be available on completion of the register by 2027. We recognise the concerns raised by witnesses with regard to the timing of the Bill's introduction, prior to the register's implementation and the data that will come from it. The disappointment that many stakeholders felt at the lack of consultation on a draft Bill was also tangible.

We note the Cabinet Secretary's commitment to his Programme for Government and his eagerness to have the legislation in place and ready for when the register is up and running. It is clear that he would like to complete the process that was started with the Visitor Accommodation (Register and Levy) Etc. (Wales) Act. As we explore further in this report, the Bill provides the necessary flexibility for a future government to respond to the data that will be created through the register.

However, as already noted, it is evident that the sector has been taken by surprise by the speed of this Bill's introduction, and it is disappointing that the sector did not have the opportunity to engage on a draft Bill. At a time when the sector is managing the aftermath of what the Cabinet Secretary describes as a "relatively busy period", and arguably facing a legislation and policy fatigue, it is essential that the Welsh Government works to re-gain stakeholder confidence as discussions progress on the Bill's detail. The structure of the Bill's implementation will be vital to its future success.

**Recommendation 5.** In his response to this report, the Cabinet Secretary should set out what discussions have taken place, and are planned to take place, with representatives of the tourism industry on proposals for the Bill's implementation.

## **Subordinate legislation**

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We note the balance between what is on the face of the Bill and what is left to subordinate legislation and, further, the Cabinet Secretary's comments about allowing flexibility in those areas where regulations are provided for. We agree it is important that innovation is not strangled by rigidity and that the sector is able to remain dynamic. However, specific provisions within the Bill will require enhanced scrutiny procedures, and we have highlighted those at the relevant points in this report.

We also note the comments from the Cabinet Secretary that he will bring forward Stage 2 amendments, as already discussed with other committees, and we would welcome further information in this regard prior to the Stage 1 debate.

**Recommendation 6.** In advance of the Stage 1 debate, the Cabinet Secretary should set out what amendments he plans to bring forward at Stage 2.

## **Financial implications**

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There was concern among witnesses about estimates set out in the Explanatory Memorandum, although we note comments that acknowledge the Welsh Government has listened to the sector and is trying to keep costs low. However, it is difficult to draw conclusions when the implementation details are not known. The costs will need to be kept under close review as data from the register is compiled and the licensing system is further developed, including detail on which bodies will be involved in the various aspects of its implementation.

We note that the Finance Committee has explored the financial implications further in its report on the Bill.

## **Human rights implications**

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We have been mindful during our scrutiny to duly consider the human rights issues that the Bill raises. We have received written and oral evidence that has assisted that consideration and we are grateful for these contributions.

We note the Welsh Government's human rights assessment in the accompanying Equality Impact Assessment and discussed by the Cabinet Secretary in his evidence.

We are also mindful that the courts generally acknowledge that, in the context of the European Convention on Human Rights (“ECHR”), it is elected representatives who are best placed to balance the rights of individuals in the ECHR against the broader general public interest.

We agree with the Cabinet Secretary that aspects of the Bill engage Article 6, Article 8 and Article 1 of the First Protocol (A1P1) to the ECHR and these are discussed below.

## **Article 6**

Article 6 provides that every person has the right to a fair and public trial or hearing if they are charged with a criminal offence; or in a genuine and serious dispute regarding a civil right or legal obligation.

Section 20(4)(a) and 21(2)(b) of the Bill permit the Welsh Ministers to reject an application for a visitor accommodation licence if they are not satisfied that the approval requirements in section 19 of the Bill are met. These include the general and specific fitness standards specified in sections 7 and 8. Section 23(2) permits the Welsh Ministers to revoke a licence for breach of licence conditions.

Section 28 of the Bill allows a visitor accommodation provider to appeal decisions by the Welsh Ministers in these circumstances to the First-tier Tribunal. This is an impartial and independent tribunal which is often named as an appellate body in Welsh legislation.

The Bill also creates a series of criminal offences (in sections 32-5 and 47) which would be heard in a Magistrates Court.

We are therefore content that these provisions are compliant with Article 6.

## **Article 8**

Article 8 of the ECHR provides that every person has the right to respect for their private and family life, home and correspondence. However the right is not absolute and the state can interfere with it if, broadly, it is in the public interest to do so, proportionate and includes appropriate safeguards. Any legislation granting an enforcement body the right to enter private property may impact these rights.

Several witnesses raised concerns over the powers set out in sections 30 and 31 of the Bill which allow an authorised person to enter licenced visitor

accommodation for the purposes of inspection and enforcement. Some witnesses opposed any access to visitor accommodation when a visitor is present on the basis that such a power is excessive and intrusive.

Section 30 permits a right of entry to premises to establish whether a visitor accommodation provider has given false or misleading information in relation to, or breached, their licence. If a regulated visitor accommodation provider does not give consent, or where there are grounds to believe that regulated visitor accommodation is unlicensed, section 31 permits an application to be made to a justice of the peace (magistrates court) for a warrant for entry and inspection purposes. Forcibly entering visitor accommodation could only therefore occur in specific, limited circumstances and would always be subject to judicial oversight.

Accordingly, we are satisfied that these provisions are compliant with Article 8. We believe the powers of entry strike an appropriate balance between the rights of visitor accommodation providers and the public interest in ensuring that visitor accommodation is compliant with the licensing scheme, and the associated confidence in the tourism sector this will deliver.

## **A1P1**

A1P1 guarantees the right to the peaceful enjoyment of property. It is a qualified right, which means that the state can impose controls on property in certain circumstances. The key test is whether that interference is proportionate and strikes a fair balance between the needs of the community and the individual property owner.

The Association of Scottish Self Caterers drew our attention to several legal challenges to the Scottish accommodation licensing scheme and highlighted the potential for non-compliance with A1P1.

We have carefully considered these issues during our deliberations. We are reassured that the licensing proposals in the Bill differ from the Scottish legislation in respect of the aspects of the Scottish scheme that have formed the basis of successful challenge during implementation. In particular we note that linking licence eligibility to planning controls, favouring particular styles of accommodation over others, mandating specific interior furnishings and differing criteria for temporary licences are not features of the proposals in this Bill. We are further reassured by the Cabinet Secretary's confirmation that the Welsh Government has learnt from the Scottish experience in preparing this Bill.



However we acknowledge that the control of private property by licensing is inherent to both schemes. We have therefore considered the aims of the licensing scheme proposals in the Bill and the benefit to the public interest it seeks to deliver.

The Cabinet Secretary has emphasised that the primary purpose of the Bill is the promotion of Welsh tourism. It seeks to achieve this by providing assurance to visitors regarding the quality of licensed accommodation in Wales. He also explained that the Bill imposes only modest additional requirements on visitor accommodation providers, such as obtaining public liability insurance, compared to their existing obligations. Beyond the requirement to obtain a licence, a provider will need to familiarise themselves with the legislative requirements, apply for a licence, potentially undergo training and pay associated fees.

We are satisfied that these proposals have a clear basis in seeking to promote tourism and improve standards of visitor accommodation in Wales. We also note that the interference with the rights of individual property owners is limited compared to their existing statutory obligations. We are satisfied the Bill appropriately balances the rights of visitor accommodation providers with the general interest and is therefore compliant with A1P1.

However, we are also mindful of the uncertainty expressed by some witnesses regarding the implementation of the scheme, including concerns over providers being unable to trade while applications for licences (or renewals) are being processed. We also heard concerns over the proposed use of regulation-making powers to prescribe important features of the scheme such as the setting of fees and renewal of licences.

We therefore note that future use of these powers, and more generally the implementation of the scheme, must seek to avoid imposing unnecessary barriers to the ability of visitor accommodation providers to conduct their business, which could form the basis for future legal challenge.

We are reassured by the Cabinet's Secretary's letter of 18 November 2025, which explained the Government's intention to use transitional powers proposed in the Bill to smooth the roll out of the scheme and allow providers to continue operating until their licence applications have been determined. We also note that future regulations made under the powers in the Bill could not make provision that is incompatible with the ECHR.

## **Post-implementation review**

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We were not convinced by the Cabinet Secretary's argument as to why a post-implementation review is not required under the Bill. A commitment made by this Welsh Government may not be upheld by a future administration. Understanding the Bill's impact will be vital in informing future tourism policy. We would like to see a requirement for a post-implementation review in the Bill. Given that the licensing provisions are expected to be implemented in 2029, we believe this review should take place no later than the end of the scheduled term of the Eighth Senedd in April 2034.

**Recommendation 7.** The Welsh Government should amend the Bill at Stage 2 to commit to undertaking and publishing a review of the operation and effect of the provisions in the Bill by no later than April 2034.

## 4. Development of Tourism

**122.** Part 1 introduces the Bill and establishes that, together with the VARL Act, the Bill is intended to form part of a Code of Welsh law. The EM notes:

*“... the Welsh Government intends to publish all enactments that form part of the Code together. This will help ensure users of the legislation are able to locate all the relevant legislation in one place.”<sup>111</sup>*

**123.** The Cabinet Secretary said the code would make the law “more accessible, easier to understand and use, and available bilingually”.<sup>112</sup>

**124.** Part 2 sets out the responsibilities of the Welsh Ministers in relation to the development of tourism in Wales.

**125.** Section 2 places a duty on Welsh Ministers to have regard to mitigating the social and environmental impacts of visitors and maintaining and promoting use of the Welsh language when exercising their development of tourism functions.

**126.** The Cabinet Secretary confirmed that Part 2 is “a restatement section”. He said:

*“It augments existing powers in two limited ways. First of all, it introduces the need to have regard to the importance of mitigating the social and environmental impacts of tourism and maintaining and promoting the Welsh language. Those are introduced in this section, but they are consistent with the Well-being of Future Generations (Wales) Act 2015 and they’re consistent with the language used in the visitor levy Bill.*

*And the second way in which you could argue that existing powers of Welsh Ministers are augmented in Part 2 is that Part 2 does have an express power to issue a code of practice in relation to the Bill. Now, I believe that it would have been possible to have issued a code of practice under the general tourism development powers. So, I think my argument would*

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<sup>111</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, Explanatory Memorandum, paragraphs 3.13

<sup>112</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 7

*be that this is only new in the sense that it is an explicit power to do something where an implicit power already existed.”<sup>113</sup>*

## Code of practice on tourism

**127.** Section 3 enables the Welsh Ministers to publish a code of practice that provides guidance about best practice in relation to tourist amenities, facilities and services, and the provision of visitor accommodation in Wales. The code of practice may provide guidance on issues such as the quality of premises used for visitor accommodation, customer service, and accessibility, or any other matter the Welsh Ministers consider appropriate.

**128.** The Cabinet Secretary said that the aim of the code of practice “is to be as helpful as possible to people to make sure they know what’s expected of them, and that they can find ways of complying with that as easily as possible.”<sup>114</sup>

**129.** Booking.com stressed that guidance should be “incredibly clear for businesses”. They noted:

*“... there can be a lot of misinformation that goes around. [...] There’s all of this pressure on operators, and, rightly or wrongly, they might feel as if they are not welcome to run their business, and so they might feel as if they want to leave the sector— run before it might become a problem. And that might not necessarily be based on evidence or on the actual reality of what licensing might mean for them, but ultimately it is creating fear within the sector.”<sup>115</sup>*

## Our view

We note and welcome that the Bill provides for the creation of a Code of Welsh law and in particular the Cabinet Secretary’s comments that this will make the legislation more accessible. Further, we note that Part 2 is predominantly a restatement of existing powers. While this is not an element of the Bill on which we have received detailed evidence, we are content to support this approach.

The code of practice to be published under section 3 will be a key tool for the industry and it is vital that the Welsh Government engages with relevant

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<sup>113</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraphs 429-430

<sup>114</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 152

<sup>115</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 63

organisations to ensure that the code offers as thorough guidance as possible to best support the sector.

**Recommendation 8.** In responding to this report, the Welsh Government should set out what work has been carried out to date on developing the code of practice and associated guidance. Further, the Welsh Government should provide further detail on the anticipated content of the code.

## 5. Regulation of visitor accommodation

### Meaning of regulated visitor accommodation

**130.** Section 5 provides a definition of “regulated visitor accommodation”. This refers to self-contained, self-catering accommodation provided in buildings, mobile homes, vessels, or vehicles for short-term stays (up to 31 nights) for business, leisure, or educational purposes. To qualify, the accommodation must include sleeping, toilet/sanitary, and cooking facilities which are provided for the exclusive use of the visitor. For mobile homes, vessels or vehicles, only those permanently or semi-permanently situated in one place are included. The definition of “regulated visitor accommodation” excludes hotels, guesthouses, bed & breakfasts, youth hostels, bunkhouses, camping barns, or camping and/or caravan sites licensed under the Public Health Act 1936 or the Caravan Sites and Control of Development Act 1960. Accommodation provided by public bodies for specific purposes (e.g. homelessness or asylum support) is also excluded from the definition.

**131.** This section also provides Welsh Ministers with the power to make regulations to amend the definition, and therefore potentially extend the scope of the licensing scheme, in future. Before doing so they “must consult any persons they consider appropriate”.

**132.** The BH&HPA was supportive of the initial focus of the Bill on self-contained, self-catering accommodation “as it avoids duplication of existing requirements that govern safety, spacing, and inspection from local authorities, for licensed holiday park businesses”.<sup>116</sup>

**133.** The WLGA “applaud the fact that over time, the scheme can be rolled out to cover a wider range of premises such as caravans and campsites which, arguably, are more problematic than self-catering accommodation”.<sup>117</sup>

**134.** FSB Wales however suggested “there is risk to a consistent regulatory framework” in the long-term in starting with self-catering accommodation.<sup>118</sup>

**135.** The STAA also questioned the restriction of the scope to ‘self-contained properties only’. If the aim of the scheme is to ensure visitors are in safe accommodation, the STAA suggested “it is necessary to include rooms let out as

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<sup>116</sup> Written evidence: [DTRVA 21 - British Holiday and Home Parks Association](#)

<sup>117</sup> Written evidence: [DTRVA 22 - Welsh Local Government Association \(WLGA\)](#)

<sup>118</sup> Written evidence: [DTRVA 01 - FSB Wales \(Federation of Small Businesses\)](#)

well and not just self-contained accommodation". The STAA added that the definition of 'self-contained' as set out in section 5 "may lead to a large number of borderline cases and could mean some operators fall outside the licensing requirement unintentionally".<sup>119</sup>

**136.** Travel Chapter and Sykes Holiday Cottages also lamented the exclusion of people renting out spare rooms, noting they will be "higher risk" than traditional short term let operators.<sup>120</sup>

**137.** However, Airbnb disagreed, saying:

*"... the guest experience of staying in a spare room is very different to the experience of staying in traditional self-contained, self-catering accommodation, and people will choose that type of accommodation because that's the experience that they want. When you look at the risk profile, it's far less likely to have health and safety risks associated with spare rooms, because these are already properties that people are living in, on a residential basis, full-time."*<sup>121</sup>

**138.** The Country Land and Business Association ("CLA Cymru") noted its concern at the initial focus of the Bill, stating: "A large majority of rural holiday accommodation providers are self-catered accommodation, putting an additional burden on rural business owners."<sup>122</sup>

**139.** MWT Cymru suggested that extending licensing to all accommodation sectors "would ensure fairness and remove confusion between "registered" and "licensed" businesses." They added:

*"A unified approach would eliminate the need to determine which parts of a mixed-use business require licensing and which do not and would support the 'level playing field' and ensure standards and safety across the sector."*<sup>123</sup>

**140.** The Cabinet Secretary said that the initial focus of the Bill is on self-contained, self-catering accommodation because "about 75 per cent of

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<sup>119</sup> Written evidence: [DTRVA 23 – Short Term Accommodation Association](#)

<sup>120</sup> Written evidence: [DTRVA 18 - Travel Chapter](#); written evidence: [DTRVA 15 - Sykes Holiday Cottages](#)

<sup>121</sup> [Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 58](#)

<sup>122</sup> Written evidence: [DTRVA 17 - Country Land and Business Association \(CLA Cymru\)](#)

<sup>123</sup> Written evidence: [DTRVA 26 – MWT Cymru \(Mid Wales Tourism\)](#)

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accommodation providers are covered by that definition, so we're starting with the bulk of accommodation in Wales".<sup>124</sup> He added:

*"But the Bill is futureproofed because it allows a future Government to add other forms of accommodation into the licensing regime, should a Government choose to do so."*<sup>125</sup>

**141.** The Cabinet Secretary later explained that "parts of other accommodation have licensing regimes of different sorts already in place", and that the Bill "makes provision for how you would transfer from that regime to this sort of regime in future, if caravan and camping sites were to be brought within the licensing regime".<sup>126</sup>

## **Fitness of visitor accommodation providers**

**142.** The Bill creates the concept of "fitness for visitor accommodation", which sets out the standards which regulated visitor accommodation must meet. The EM explains that "this is based on the "fit for human habitation" standard in the private rented sector".<sup>127</sup>

### **Meaning of fitness for visitor accommodation**

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**143.** Section 6 explains that a premises offering regulated visitor accommodation is considered "fit" unless it fails to meet either the general fitness standard in section 7, or any relevant specific fitness standards set out in the Bill in sections 9-13. For the general standard, the failure must be serious enough to pose a risk to safety or comfort, such that the "premises are not reasonably suitable" for visitors.

**144.** This section also provides Welsh Ministers with a regulation-making power to amend the Act to add to or change the standards premises are required to meet.

### **Fitness for visitor accommodation: general standard**

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**145.** Section 7 describes the general fitness standard that regulated visitor accommodation must meet. The requirements under the general standard are divided into two parts: those in relation to the risk of harm to visitors (such as the premises being structurally stable, hygienic and secure, and the premises and fixtures being free from disrepair); and those in relation to the amenity of visitors

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<sup>124</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 48](#)

<sup>125</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 48](#)

<sup>126</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraphs 72 and 74](#)

<sup>127</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), Explanatory Notes

(such as the premises having adequate lighting, heating and ventilation, drainage, sleeping space and appropriate cooking and sanitary facilities).

**146.** Section 7, in combination with section 6, means that if any of these requirements, if applicable, are not met to the extent that there would either be a risk of harm to the visitor or “because the quality of the visitor’s experience would be compromised to a sufficient extent”, then the general fitness standard has not been met and the premises is not fit for visitor accommodation.

**147.** Witnesses agreed that further clarity was needed in relation to the general standard. Airbnb suggested the requirements in section 7 should be “much clearer and better defined”, adding “It’s a lot of exposure to liability for obligations where it’s still unclear about what’s required to meet them.”<sup>128</sup>

**148.** PASC suggested that “Section 7(1)(a) and (b) contain terms that are inherently subjective and operationally unclear” and “Overall, section 7 goes beyond what is reasonably required to secure safe visitor accommodation and embeds too much subjectivity into the licensing test.”<sup>129</sup> MWT Cymru agreed that section 7 “relies on subjective terms”.<sup>130</sup>

**149.** The STAA said their members were of the view that “section 7 of the Bill unnecessarily goes beyond existing legal obligations for accommodation providers in respect of health and safety.”<sup>131</sup>

**150.** PASC stated that “in order to be able to really clarify what that section means, you’re going to have to go through a huge amount of guidance”, and argued that customers would leave bad reviews if they were not content with the amenities on offer.<sup>132</sup> North Wales Tourism agreed that “it’s a very self-regulating landscape when it comes to some of the subjective standards with peer reviews.”<sup>133</sup>

**151.** Witnesses including MWT Cymru and North Wales Tourism compared the general standard with the grading scheme for Visit Wales. North Wales Tourism said:

*“... when it comes to enforcement and entering a premises, it would be, well, on which elements is entry being enforced, because the safety standards are all matters of fact, and then some of the fitness for purpose, some of those are subjective*

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<sup>128</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 145

<sup>129</sup> Additional evidence - PASC UK (1)

<sup>130</sup> Additional evidence - MWT Cymru (Mid Wales Tourism)

<sup>131</sup> Additional evidence - Short Term Accommodation Association (STAA)

<sup>132</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 312

<sup>133</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 483

*standards and overlaid with an element of Visit Wales's grading scheme.*"<sup>134</sup>

**152.** In terms of overlap with the Visit Wales grading scheme, the Cabinet Secretary said he had been in discussions with Visit Wales, and that thought had already been given to how the two regimes would be integrated. He noted:

*"the future for the industry in Wales is to be a quality industry. And that's how Visit Wales would use the licence as a basis to move the industry further in that direction."*<sup>135</sup>

**153.** The WLGA suggested that the Bill is about ensuring high standards, and added that it is also "about providing some measures of control where performance and standards don't meet our expectation as local authorities, not just in terms of the offer to visitors but also in terms of nuisance issues like noise, anti-social behaviour, waste presentation".<sup>136</sup> They later added that guidance would be needed on those matters, "to ensure consistency".<sup>137</sup>

**154.** Cymdeithas yr Iaith suggested that "Evidence given by people who already live next door to homes that have been converted into holiday accommodation shows that their privacy has been disturbed and that noise levels are disrupting their everyday lives".<sup>138</sup>

**155.** Witnesses including PASC and Travel Chapter argued that "there are already other mechanisms in place" to address issues including waste and anti-social behaviour.<sup>139</sup>

### **Fitness for visitor accommodation: specific standards**

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**156.** Section 8 defines the five specific fitness standards: fire prevention; electrical maintenance; gas maintenance; carbon monoxide risk; and insurance. Each of these standards are then described in greater detail in sections 9-13.

**157.** The WLGA suggested that a "fit and proper person test or a similar requirement" should be included as part of the licence conditions for all visitor accommodation providers.<sup>140</sup>

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<sup>134</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 482

<sup>135</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 505

<sup>136</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 10

<sup>137</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 153

<sup>138</sup> Written evidence: DTRVA 13 – Cymdeithas yr Iaith (translation provided by Senedd Cymru)

<sup>139</sup> Written evidence: DTRVA 16 – Professional Association of Self-Caterers UK Cymru; written evidence: DTRVA 18 – Travel Chapter

<sup>140</sup> Written evidence: DTRVA 22 – Welsh Local Government Association (WLGA)

**158.** A Senior Technical Officer from Denbighshire County Council welcomed the inclusion of the water supply being free from contamination as a requirement, but stressed that:

*“... in respect of premises that are served by a Private Water Supply, I feel it needs to be made clear that premise operator should be seeking confirmation of compliance with drinking water standards via the Local Authority or using a contractor that the Local Authority is willing to accept as a properly accredited water sampler.”<sup>141</sup>*

**159.** Mid and West Wales Fire and Rescue Service and South Wales Fire and Rescue Service agreed that the Bill could lead to “a significant increase in demand for independent fire risk assessors.”<sup>142</sup> South Wales Fire and Rescue Service said:

*“The scale and timing of this increase will depend on how the licensing framework is implemented and whether formal qualification standards are established.”<sup>143</sup>*

**160.** The Cabinet Secretary told us:

*“... we start with, I would describe it as, a fairly basic set of standards that will have to be met in order to get a licence. A future Government could choose to augment those standards to include, for example, some quality standards in them, and the Bill is futureproofed because it provides a power to allow that to happen”<sup>144</sup>*

**161.** He later added:

*“... four of the five specific requirements are things that they already have to do. They have to demonstrate that they are doing them for the purposes of obtaining a licence, but they ought not to be offering accommodation now if they don't have those things already in place.*

*There is only one additional requirement, and that's a requirement that we think about 75 per cent of the industry is*

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<sup>141</sup> Written evidence: [DTRVA 03 - Philip Caldwell, Senior Technical Officer \(Environmental Health\)](#)

<sup>142</sup> Written evidence: [DTRVA 29 - Mid and West Wales Fire and Rescue Service](#)

<sup>143</sup> [Letter from South Wales Fire and Rescue Service, 14 November 2025](#)

<sup>144</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 48](#)

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*probably doing anyway. But they don't currently have a requirement, a legal requirement, to have public liability insurance, and they will, as a result of this Bill, if they are to obtain a licence.*"<sup>145</sup>

**162.** When asked about adding standards to the Bill, for example an energy performance certificate, the Cabinet Secretary stressed his view that the Bill should "start simple", and noted that "every time you add another condition, you add more obligations on to the accommodation providers."<sup>146</sup>

**163.** In relation to the provisions for fire prevention, South Wales Fire and Rescue Service noted:

*"Section 9(2) of The Bill places the responsibility on the Visitor Accommodation Provider (VAP) to carry out a fire risk assessment. However, this requirement may be impractical and could lead to inconsistent or inadequate assessments as VAPs, particularly those operating small-scale or domestic-type visitor accommodation, are unlikely to possess the necessary competence or technical understanding to carry out a compliant assessment."*<sup>147</sup>

**164.** They added:

*"The wording of the Bill should be amended to require the VAP to ensure a suitable and sufficient fire risk assessment is completed by a competent person, rather than the provider themselves conducting it. This would promote higher standards of safety and reduce the likelihood of non-compliant or inadequate assessments."*<sup>148</sup>

**165.** The Cabinet Secretary stressed that the Bill is "clear that the ultimate responsibility for this assessment rests with the visitor accommodation provider, as does the responsibility to put appropriate precautions in place", and added that it is "common practice and entirely lawful for responsible persons to discharge this duty by contracting with an external provider or delegating the task to another suitably qualified person."<sup>149</sup>

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<sup>145</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraphs 499-500](#)

<sup>146</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 123](#)

<sup>147</sup> [Letter from the South Wales Fire and Rescue Service, 14 November 2025](#)

<sup>148</sup> [Letter from the South Wales Fire and Rescue Service, 14 November 2025](#)

<sup>149</sup> [Letter from the Cabinet Secretary for Finance and Welsh Language, 27 November 2025](#)

**166.** With regard to smoke alarms, the South Wales Fire and Rescue Service suggested that provision in the Bill “appears to imply that the installation of a single smoke alarm per floor would be sufficient to meet the minimum safety requirements.” They added:

*“This approach risks oversimplifying fire safety provision and could lead to inadequate protection in certain types of visitor accommodation.”<sup>150</sup>*

**167.** While the Cabinet Secretary argued that the approach in the Bill is consistent with the approach taken in the Renting Homes (Fitness for Human Habitation) (Wales) Regulations 2022, he confirmed he had “asked officials to consider the requirements under section 9 more generally, with a view to considering whether any amendments could or should be made to the Bill at Stage 2, to ensure it better reflects the existing obligations under the Fire Safety Order.”<sup>151</sup>

## Licensing

**168.** Section 14 sets out what is meant by a visitor accommodation licence and states that a premises or part of a premises can be subject to two or more licences.

**169.** Section 15 sets out the conditions that must be met in order for a licence to be granted to a VAP:

- The VAP must be registered under the VARL Act in respect of the premises, and the register must show that they provide the accommodation at that location;
- The VAP must meet any relevant training requirements that have been prescribed in regulations;
- The accommodation must meet all relevant specific fitness standards, and the general standard must be met whenever a visitor is entitled to stay at the accommodation;
- The VAP must take all reasonable steps to ensure that copies of the licence certificate and the statement of information (see section 22) are given to the visitor before they arrive;

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<sup>150</sup> Letter from the South Wales Fire and Rescue Service, 14 November 2025

<sup>151</sup> Letter from the Cabinet Secretary for Finance and Welsh Language, 27 November 2025

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- The VAP must ensure that a copy of the licence certificate is available at the premises, either on paper or electronically, whenever a visitor is entitled to stay at the accommodation.

**170.** The EM notes that there will be “a single national licensing authority”.<sup>152</sup>

**171.** A number of witnesses explicitly welcomed the approach of having a central licensing authority, including the FSB, the WLGA and the STAA. The STAA welcomed the choice to have a national administrator of the licensing scheme as it “will avoid the inefficiencies” of a fragmented approach.<sup>153</sup>

**172.** The EM states:

*“At this stage, we have not determined whether the licensing authority functions should be undertaken directly by Welsh Government. As part of the examination of the appropriate delivery roles, we are working with WRA to develop the interaction with the registration of visitor accommodation and the register to be maintained by them under the VARL Act.”*

**173.** The Cabinet Secretary told us:

*“... although we don’t name the WRA on the face of this Bill, my expectation is that the WRA will be the licensing authority as well. I don’t want people to have to deal with two different organisations when they’ve got used to dealing with one, because, by the time this Bill is in operation, people will have already completed their registration with the WRA, they’ll have some form of relationship with that organisation already, and I want this to be as easy and as seamless for the operator as I can.”<sup>154</sup>*

**174.** The Interim Chief Executive of the WRA said:

*“We have had discussions with the Welsh Government and with the Minister around us doing that registration and that front door. We have been asked to do some discovery work around mapping out a service design for the end to end of licensing,*

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<sup>152</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, Explanatory Memorandum, Chapter 8

<sup>153</sup> Written evidence: DTRVA 23 – Short Term Accommodation Association

<sup>154</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 162



*which will allow them to make some further decisions off the back of that.”<sup>155</sup>*

**175.** The Cabinet Secretary later clarified that the term “licensing authority” had been used “for ease and brevity”, and that “the core functions of the scheme will remain with the Welsh Ministers”. He further explained:

*“... with the powers afforded under section 83 of the Government of Wales Act 2006, for example, we are able to enter into agency arrangements with other public bodies in respect of the exercise of those functions. It is using powers such as these that we will look to other public bodies for certain elements of the operation of the scheme”.<sup>156</sup>*

**176.** The Cabinet Secretary noted that the Welsh Government would be looking at “Visit Wales, local authorities and other bodies” for some elements of the Bill’s implementation, including guidance on fitness for visitor accommodation, deciding when compliance and enforcement is necessary, and determining whether a providers’ application should be approved.<sup>157</sup>

**177.** The WLGA, however, noted they would “strongly object” to Visit Wales being the enforcement authority.<sup>158</sup>

**178.** The Cabinet Secretary noted that he would not expect the WRA to “deal with the minority of cases where you need a physical visit”. He said:

*“There, there are two choices, it seems to me. Local authorities I will probably put in the lead at the moment, but Visit Wales is also a possibility as well, because there’s an organisation that is also used to being out on the ground, making physical visits to properties, dealing directly with people who provide accommodation.”<sup>159</sup>*

## **Visitor accommodation provider training**

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**179.** Section 16 provides that the Welsh Ministers may impose, through regulations, a training requirement on VAPs that provide or offer to provide regulated visitor accommodation. The training would encompass the

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<sup>155</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 196

<sup>156</sup> Letter from the Cabinet Secretary for Finance and the Welsh Language, 18 November 2025

<sup>157</sup> Letter from the Cabinet Secretary for Finance and the Welsh Language, 18 November 2025

<sup>158</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraphs 36-38

<sup>159</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 98

requirement for a premises to be fit for visitor accommodation, the content of any code of practice issued under section 3 and any other matters connected to the regulation of visitor accommodation. Before making regulations under this section, the Welsh Ministers must consult any persons they consider appropriate.

**180.** Several witnesses were cautious about the need for a training requirement. The STAA said they felt that “required training is ultimately unnecessary”, and noted:

*“The majority of VAPs have been working in the sector for a long time and already comply fully with the licensing conditions as they are existing legal requirements.”<sup>160</sup>*

**181.** Airbnb suggested that there is “no evidence that requiring mandatory training as a condition of holding a licence is needed”, and argued “Signposting VAPs to guidance about their obligations and sources of information and promoting a clear code of practice should be sufficient.”<sup>161</sup>

**182.** Booking.com agreed that a code of practice would suffice, noting that: “many operators already meet legal conditions and have been operating for many years, so mandatory training adds cost without clear incremental benefit.”<sup>162</sup>

**183.** MWT Cymru and Visit Pembrokeshire suggested that “provision must also be made for operators in rural areas where internet access is unreliable.”<sup>163</sup>

**184.** The Cabinet Secretary said:

*“Training is not just a burden. Training is a good thing for the industry to make sure that people who operate within it are as well equipped as they need to be to discharge the obligations that they have. And this Bill itself has, or brigades together, obligations in a new way. And I think it is right that people in the industry are properly equipped to discharge those responsibilities.”<sup>164</sup>*

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<sup>160</sup> Written evidence: [DTRVA 23 – Short Term Accommodation Association](#)

<sup>161</sup> Written evidence: [DTRVA 12 – Airbnb](#)

<sup>162</sup> Written evidence: [DTRVA 32 – Booking.com](#)

<sup>163</sup> Written evidence: [DTRVA 26 – MWT Cymru \(Mid Wales Tourism\)](#); written evidence: [DTRVA 31 – Visit Pembrokeshire](#)

<sup>164</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 54](#)

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**185.** He added:

*"I don't want people who are highly experienced and already have a strong track record having to go through training that really adds no value to them. So, what we will do, in continued conversation with the industry, through regulation, is to make sure that you get the training that is worth you having and will add to your ability to do that job effectively."*<sup>165</sup>

**186.** The Cabinet Secretary explained that the Welsh Government had "listened carefully to what the industry has told us", and the reason for the detail being left to regulation is:

*"... to make sure that the training is aligned to the needs of the industry and, for that reason, I think regulations are a better way to have that rather more subtle set of obligations than just a blanket obligation there on the face of the Bill where everybody has to do the same level of training, whether you need it or not."*<sup>166</sup>

### **Licence applications: procedure**

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**187.** Section 18 provides for the process that a VAP must follow when applying for a visitor accommodation licence. However, the precise details of that process, the information to be provided and the fee to be paid, will be specified by Welsh Ministers in the future. Section 19 describes the requirements that the Welsh Ministers must be satisfied are met before granting a licence, and section 20 sets out the arrangements for determining a licence application.

**188.** The EM notes that the Welsh Government's best estimate "assumes that 30,000 premises are licensed in the first year by 15,000 providers".<sup>167</sup> The EM refers to the Welsh Government's ambition to "make use of Artificial Intelligence as far as possible to check the documentation submitted" as part of the licence application.<sup>168</sup>

**189.** The WLGA said it was "in favour of such advances" but added: "we would be interested to establish how such technology can assess with a high degree of

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<sup>165</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 55](#)

<sup>166</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 55](#)

<sup>167</sup> [Development of Tourism and Regulation of Visitor Accommodation \(Wales\) Bill, Explanatory Memorandum, paragraph 8.37](#)

<sup>168</sup> [Development of Tourism and Regulation of Visitor Accommodation \(Wales\) Bill, Explanatory Memorandum, paragraph 8.46](#)

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confidence that submitted certification and other documentary evidence of compliance is genuine”.<sup>169</sup>

**190.** The WRA noted they would potentially be looking at “hundreds of thousands of documents” and confirmed they are going to do a “proof of concept” about how AI can be used to help with the administrative process. They also noted that they want to look at “what data sources are out there [...] It’s about whether we can look at, well, can we access those things beforehand, and, rather than asking somebody for their documents, we can ask them permission to go and look for it”.<sup>170</sup>

**191.** The Association of Scotland’s Self-Caterers was sceptical on the proposed use of AI, however, stating that “the evidence from Scotland shows that’s entirely unrealistic”.<sup>171</sup>

**192.** The Cabinet Secretary said he expected that “the considerable majority of licences will be issued very straightforwardly through the licensing body by organisations providing evidence of the five tests that we set out”. He noted that this would be done in a “whole variety of ways”:

*“You’ll be able to upload it, submit it, there’ll be a system that will scan it, identify that it’s all in the right order, and the licence will be issued.”*<sup>172</sup>

**193.** When asked for examples of how the system might be automated, a Welsh Government official pointed to the Land Registry, which has done work with IT delivery partners to look at scanning individual transfer deeds for new housing developments. He explained that the system works “to convert the scanned PDFs to text that a machine can read, and then can compare the text of the deed for an individual plot against the precedent deed for the whole development, pick up any significant differences and flag those to be looked at.”<sup>173</sup>

**194.** The STAA questioned the timeline for issuing licences. They highlighted that Rent Smart Wales issues around 6,000 licences a year, and that those “take up to 8 weeks to process”.<sup>174</sup> They subsequently provided additional written evidence to set out the key differences between the number of applications processed by Rent Smart Wales and those expected to be processed under the licensing

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<sup>169</sup> Written evidence: [DTRVA 22 – Welsh Local Government Association \(WLGA\)](#)

<sup>170</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 240](#)

<sup>171</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 280](#)

<sup>172</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 79](#)

<sup>173</sup> [Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 458](#)

<sup>174</sup> Written evidence: [DTRVA 23 – Short Term Accommodation Association \(STAA\)](#)

scheme.<sup>175</sup> PASC raised similar concerns in their additional evidence, noting they did not think the comparison with Rent Smart Wales was right.<sup>176</sup>

**195.** Witnesses raised concerns about an “apply and wait” process for applications. Awaze said:

*“... this could leave owners unable to operate for significant amounts of time and impact prospective bookings while they wait for their licence.”<sup>177</sup>*

**196.** This position was echoed by the STAA, Sykes Holiday Cottages, Airbnb, Travel Chapter and Booking.com.

**197.** The Cabinet Secretary explained:

*“There are powers in the Bill that allow for transitional arrangements to be put in place to enable as smooth an implementation as possible.*

*We intend to use these powers to allow existing providers to continue operating until such time as their application is determined, so long as they have applied for a licence by the specified deadline as the scheme is rolled out.”<sup>178</sup>*

**198.** He added:

*“In respect of renewal applications, the power on the face of the Bill at section 25(2), expressly allows for provision to be made to enable a licence to continue to have effect until a renewal application has been determined. The intention is to avoid a provider who has applied for renewal being prevented from operating purely due to their application not having been determined.”<sup>179</sup>*

**199.** Section 22 explains what must be included in a licence certificate given to a VAP when a licence is granted. It must state:

- the premises the licence covers,

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<sup>175</sup> [Additional evidence – Short Term Accommodation Association STAA](#)

<sup>176</sup> [Additional evidence – PASC UK 2](#)

<sup>177</sup> [Written evidence: DTRVA 14 - Awaze](#)

<sup>178</sup> [Letter from the Cabinet Secretary for Finance and Welsh Language, 18 November 2025](#)

<sup>179</sup> [Letter from the Cabinet Secretary for Finance and Welsh Language, 18 November 2025](#)

- the type of visitor accommodation that may be provided there, and
- the conditions that apply to the licence.

**200.** The Welsh Ministers must also provide the VAP with a “statement of information” explaining how the licensing system operates and how complaints can be made to Welsh Ministers if a visitor is concerned that a condition of the licence has been breached.

**201.** Witnesses suggested there was “insufficient information” relating to complaints and questioned whether it applied to complaints around the licensing process or around the provision of accommodation.<sup>180</sup> Booking.com said:

*“I’d argue that, for the provision of accommodation, there’s a complaints process that people will be able to go through with the accommodation provider. It should be, then, on the licence process, but, again, there’s not enough information for us really to be able to comment.”<sup>181</sup>*

**202.** West Wales Holiday Cottages noted that while they support a “proper complaints process”:

*“... it needs clear guidance, so genuine safety issues are dealt with properly without allowing the system to be misused for general complaints or personal preferences.”<sup>182</sup>*

**203.** FSB Wales said, “it’s important that there is a central point of contact for people to make any complaints and that that’s clear to anybody who wishes to complain.”<sup>183</sup>

**204.** The Cabinet Secretary explained that a visitor accommodation provider would be obliged to provide information about the complaints procedure at two points: when the booking is made, and when the customer arrives at the accommodation. He said:

*“The complaint will be made to the Welsh Ministers, as the licensing authority, and then it will be for the licensing authority to decide whether the complaint is actually a complaint that is relevant to the licensing conditions [...] If it is, then in the way I’ve described, the first thing you would expect the licensing*

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<sup>180</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 160

<sup>181</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 161

<sup>182</sup> Written evidence: DTRVA 33 - West Wales Holiday Cottages

<sup>183</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 313

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*authority to do is to let the accommodation provider know that and give them a chance to put it right, and that's what you would expect to happen. And you only reach the further reaches of a complaints procedure when people have had that opportunity and failed to take advantage of it to put right what should be put right."*<sup>184</sup>

## **Licences: expiry and renewal**

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**205.** Section 25 specifies that licences will expire after one year or "such other, longer, period as may be specified in the licence".

**206.** The EM states that "Licences are generally expected to be valid for a year".<sup>185</sup>

**207.** This section also requires the Welsh Ministers to make provision, in regulations, for the process by which licences will be renewed. In particular this will include, where a renewal application has been submitted, treating the licence as continuing until the Welsh Ministers have taken a decision regarding the renewal application.

**208.** The regulation-making power under this section also allows for offences to be created. According to the EM this is "to ensure the regulations are complied with".<sup>186</sup>

**209.** Witnesses including the WTA and STAA suggested that a one-year licence period could cause uncertainty for providers. UKHospitality Wales explained:

*"... there are consequences here for things like marketing and forward bookings. The industry is a much longer sort of life than annually, and people are booking quite often a year or more in advance for some of the premises, and the adverts that are being put into different areas have actually got quite a long lead-in time. And so it might be easier just as an organisational thing if it was three to five years rather than annually".*<sup>187</sup>

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<sup>184</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraphs 524-525

<sup>185</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, Explanatory Memorandum, paragraph 8.59

<sup>186</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, Explanatory Memorandum, Chapter 5

<sup>187</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 287

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**210.** Airbnb said:

*“When annual renewals are a requirement of a licensing scheme, you often see the accommodation provider having a moment of uncertainty because they don’t know if they can honour future bookings. And when jurisdictions have introduced an annual licence requirement, in most cases they subsequently extend it to three years.”<sup>188</sup>*

**211.** Awaze suggested “it is unreasonable to expect owners to expend the same administrative and opportunity costs each year to obtain a licence when it is unlikely that their circumstances will have substantially changed”.<sup>189</sup>

**212.** The Cabinet Secretary suggested that a five-year licence could be “an inhibition” to someone entering the sector, noting that a one-year licence would mean that new entrants could “decide whether or not this is a business that they want to continue in”.<sup>190</sup> He added:

*“My aim is that renewal of the licence should be as straightforward as possible. I don’t want people to have to re-provide information that is already extant as part of getting your licence for a second year. [...] The application for your second year of a licence should be, I hope, as straightforward and as simple as it can be. I think that that mitigates some of the arguments that you’ve heard in favour of three- and five-year licences, because this is a system that should not have significant obligations on people; it should be as automatic as we can make it.”<sup>191</sup>*

**213.** Responding to why the Bill requires the Welsh Ministers to make regulations dealing with renewal of licences, instead of setting this out on the face of the Bill, especially given the regulations could create criminal offences, the Cabinet Secretary said:

*“... regulations are the way that allows you to do that more flexibly and to design a system that responds to the needs of the accommodation provider, rather than, as I say, having something that is there on the face of the Bill, but which is*

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<sup>188</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 101

<sup>189</sup> Written evidence: DTRVA 14 - Awaze

<sup>190</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 439

<sup>191</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 440

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*inevitably blunter and puts the burden more on their shoulders.”<sup>192</sup>*

## Enforcement

**214.** The EM states “we expect the licensing authority to take a ‘stepped’ escalatory approach to enforcement, designed to encourage and support compliance.”<sup>193</sup> The EM also sets out that local authority housing and/or environmental health services will be reimbursed on a “cost-recovery basis” for any activities they undertake “in relation to visitor accommodation suspected or confirmed as being non-compliant with licensing requirements”.<sup>194</sup>

### Power to require information

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**215.** Section 29 allows the Welsh Ministers to issue an information notice to a someone who currently provides or offers to provide visitor accommodation (or someone who Welsh Ministers consider may have done this) or a person who assists in the provision of visitor accommodation. An information notice requires (rather than requests) the recipient to provide the information specified within a specified time if they have access to it. Failure to comply with a notice without a reasonable excuse is an offence punishable with a fine under section 33.

### Entry and inspection of premises for enforcement purposes

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**216.** Section 30 provides the Welsh Ministers with a power to enable an authorised person to enter a premises licensed under Part 3 of the Bill for the purposes of inspection - which includes inspecting, copying or taking away documentary evidence (including information stored on a computer or other electronic device). This only applies where Welsh Ministers have reasonable grounds for believing that a VAP has given them false or misleading information (and thus committed an offence) or breached a licence condition. The licensee must be given reasonable notice of an inspection and force may not be used to gain access to the premises.

**217.** Section 31 sets out that the Welsh Ministers can apply to a magistrate for a warrant to enter a premises where a previous request for entry under section 30 has either gone unanswered or been refused, or where it is reasonably expected that entry will be refused. A warrant may also be granted in respect of premises

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<sup>192</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 66](#)

<sup>193</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), paragraph 7.25

<sup>194</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, [Explanatory Memorandum](#), paragraph 8.43

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which are not licensed, but which the Welsh Ministers suspect are being used (or have been used) to offer or provide regulated visitor accommodation.

**218.** Beach View Cottages was strongly opposed to “inspectors having power of entry at any time”,<sup>195</sup> and PASC suggested that the powers of entry are “excessive”. However, the STAA noted they were “broadly content” with the provisions for entry and inspection, “so long as there can be reassurance set out in guidance about how these powers will be used.”<sup>196</sup> The BH&HPA agreed that the powers needed to be supported by “granular level statutory guidance”.<sup>197</sup>

**219.** The WLGA welcomed the fixed penalty provision but stressed that resourcing enforcement activity will be “critical” to the success of the scheme, “as weak enforcement could lead to informal arrangements or unlicensed operations by operators.”<sup>198</sup>

**220.** The Cabinet Secretary stressed that the Bill “is not designed to have enforcement as its first port of call”.<sup>199</sup>

**221.** A Welsh Government official clarified that:

*“... if the licensing authority were to work with local authorities to undertake enforcement action, we’d be probably more looking at officials from environmental health and/or housing teams that have the kind of experience of undertaking investigations of the kinds of issues that breaches of licence conditions would represent.”<sup>200</sup>*

**222.** The WLGA expressed concern about the potential burden on local authorities:

*“I’m not sure there’s a complete understanding of what the burden, in terms of licensing and enforcement required on local authorities, will be, and in particular how the funding of that regime will work, given that you’d be asking different parts of a council to do investigations and/or enforcement.”*

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<sup>195</sup> Written evidence: [DTRVA 09 – Beach View Cottages](#); written evidence: [DTRVA 16 – Professional Association of Self-Caterers, UK \(Cymru\)](#)

<sup>196</sup> [Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 478](#)

<sup>197</sup> [Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 480](#)

<sup>198</sup> Written evidence: [DTRVA 22 – Welsh Local Government Association](#)

<sup>199</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 94](#)

<sup>200</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 104](#)

**223.** The WLGA later added:

*“If you do go down the WRA route, the challenge for that authority is how does it build that link effectively with the different departments of those councils and then work through how does the resourcing of those different departments work as well.”<sup>201</sup>*

**224.** The WLGA also highlighted the “unintended financial and resource burden” of introducing the scheme, suggesting that “previous projects have led to a higher demand on existing services due to the additional publicity surrounding the topic”.<sup>202</sup>

**225.** The National Trust suggested that any fines for non-compliance “should be reinvested into tourism in Wales”.<sup>203</sup>

**226.** MWT Cymru was keen for there to be transparency around “what can be claimed, how much, and what activities qualify as legitimate enforcement”, and went on to recommend that “local authorities should be required to publish annual reports showing actions carried out and expenditure claimed”.<sup>204</sup>

**227.** FSB Wales expressed concern that there is a lack of clarity on what body or bodies will be tasked with ensuring compliance, and that “without clarity on how enforcement is implemented, there remains a risk of the good providers absorbing costs while non-compliant providers avoid the same costs”.<sup>205</sup>

**228.** Welsh Government officials referred to the parallels with Rent Smart Wales and one official stated, “We’d envisaged that kind of arrangement, because probably someone central will have to decide whether something ought to be investigated”.<sup>206</sup> Another official conceded that “there is a lot” that is “up for discussion to work with local authorities locally and regionally”.<sup>207</sup>

**229.** Speaking about their experience, Rent Smart Wales noted that they have “a memorandum of understanding with every local authority.” They explained:

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<sup>201</sup> [Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 34](#)

<sup>202</sup> Written evidence: [DTRVA 22 – Welsh Local Government Association \(WLGA\)](#)

<sup>203</sup> Written evidence: [DTRVA 02 – National Trust](#)

<sup>204</sup> Written evidence: [DTRVA 26 – MWT Cymru \(Mid Wales Tourism\)](#)

<sup>205</sup> Written evidence: [DTRVA 01 – FSB Wales \(Federation of Small Businesses\)](#)

<sup>206</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 110](#)

<sup>207</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 104](#)

*“They also have all of the enforcement powers that Rent Smart Wales has, and they can choose whether they want to do the enforcement to ensure compliance or not.”<sup>208</sup>*

**230.** Rent Smart Wales later explained that the memorandum of understanding “outlines the roles and responsibilities of each party in relation to the promotion and delivery of the legislation and responsibility of each for enforcement activities”. They confirmed that, to facilitate the partnership, Cardiff Council has provided its general consent to each Council to undertake specific activities under the Housing (Wales) Act 2014.

**231.** They added:

*“Local authorities normally notify the central authority of non-compliance where they find it, unless they are taking a criminal case for offences under the Housing Act 2004, where it makes sense to roll all the offences into one prosecution file. This is because taking action for an offence under the Housing (Wales) Act 2014 is an additional workload involving different timeframes for actions being needed.”*

**232.** They noted that current enforcement activity levels show 367 prosecutions undertaken by Rent Smart Wales and 21 by local authorities,<sup>209</sup> adding that “The number of fixed penalty notices served by local authorities over the last 10 years is less than 5.”<sup>210</sup>

## Offences

**233.** The Bill creates a total of five offences. Sections 32, 33, 34, 35 and 47 create the following offences, respectively:

- providing or offering to provide regulated visitor accommodation at unlicensed premises without a reasonable excuse;
- failure to comply with an information notice issued under section 29 without a reasonable excuse;

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<sup>208</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 124

<sup>209</sup> Rent Smart Wales: Enforcement dashboard

<sup>210</sup> Additional evidence – Rent Smart Wales

- knowingly or recklessly supplying false or misleading information to the Welsh Ministers in connection with their functions under this legislation (for instance, as part of a licensing application);
- wilfully obstructing an authorised person who is validly exercising a function under this Part of the Bill;
- marketing or advertising a premises in a way that fails to comply with the requirement in section 46(1) without a reasonable excuse.

**234.** A person guilty of an offence under these sections is liable on summary conviction to a fine.

### **Fees in relation to visitor accommodation licences**

**235.** Section 38 provides a regulation-making power for the Welsh Ministers to make provision for and in relation to the charging of fees in relation to the licensing scheme. Welsh Ministers “must consult any persons they consider appropriate” before making these regulations.

**236.** The EM notes: “Over time it is expected that the costs of operating the scheme will be fully covered by licensing fees, with the costs of any necessary enforcement actions expected to be met from associated fixed penalties [...] Until such time as the licensing scheme is fully self-funding, fees will be set at a level which reflects best estimates of the costs of the scheme.”<sup>211</sup>

**237.** Based on an estimated budget of £2.25m, the EM suggests an annual licensing fee of £75 based on a best estimate of 30,000 self-catering visitor accommodation being licensed. A majority of witnesses including WTA, FSB Cymru and the STAA questioned the £75 fee and suggested that it was an underestimate.

**238.** The STAA expressed concern that the assumptions about fees “do not appear to be robust when compared to the Scottish licensing scheme or the Welsh Government’s own lighter touch Rent Smart Wales scheme”.<sup>212</sup>

**239.** MWT Cymru claimed that the suggested £75 per unit, without tiering, “will disproportionately affect larger sites.” They suggested: “Tiered or capped fees are essential to avoid penalising larger but compliant operators.”<sup>213</sup>

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<sup>211</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, Explanatory Memorandum, paragraph 8.44

<sup>212</sup> Written evidence: DTRVA 23 – Short Term Accommodation Association

<sup>213</sup> Written evidence: DTRVA 26 – MWT Cymru (Mid Wales Tourism)

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**240.** The Scottish Association of Self-Caterers warned that the £75 figure “is entirely unbelievable on the evidence that we have had from Scotland” and noted that “the smallest fee in Scotland is £205 and the biggest is £5,698”.<sup>214</sup>

**241.** The WRA suggested that the £75 fee had been predicated on the assumption of reducing human interaction by “getting the AI technology to filter out the difficult cases”.<sup>215</sup>

**242.** The Cabinet Secretary explained that the Welsh Government is bound by rules which mean you “can’t have a scheme that makes money”. He noted:

*“... the maximum charge is already there in the sense that, when you add up the cost and you divide it by the number of people who have to pay the fee, that’s what the fee will be.”*<sup>216</sup>

**243.** He added:

*“... at the moment, the Bill requires consultation before the final fee is fixed, but it doesn’t require a vote on the floor of the Senedd on that. I’ve asked the team to consider whether we would bring forward a Stage 2 amendment so that, the first time the fee is set, there would have to be an affirmative vote on the floor of the Senedd.”*<sup>217</sup>

## **Powers to share information**

**244.** Section 39 allows for the sharing of information between Welsh Ministers and a number of listed bodies, as well as other bodies which Welsh Ministers may specify in future by regulations. The bodies listed in this section include Welsh local authorities, Welsh fire and rescue authorities, the Welsh Revenue Authority and Rent Smart Wales.

**245.** A Welsh Government official confirmed:

*“... it doesn’t supersede existing data protection obligations. All the information will need to be processed lawfully, and as the scheme is operationalised, the licensing authority and the WRA and other regulators will need to make sure that their privacy notices and data-handling procedures are in line with the*

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<sup>214</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 279

<sup>215</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 245

<sup>216</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 436

<sup>217</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 437



*requirements of data protection legislation. They wouldn't be able to share the information unless they were doing so lawfully.”<sup>218</sup>*

**246.** South Wales Fire and Rescue Service suggested that it is not clear how information-sharing will operate in practice. They noted there are several questions to be considered, including whether the information will need to be proactively shared, and what mechanisms will be in place for such requests. They also suggested that it is “unclear how the licensing authority will handle cases where conflicting evidence is presented”, and that “Without clear procedures, such disputes could delay licensing decisions or undermine confidence in the process.” They concluded:

*“To function effectively, the information-sharing provisions must be supported by detailed guidance. This should define what constitutes acceptable ‘evidence’, clarify the weight given to different sources of information, and set out how disagreements between assessors and fire and rescue authorities will be resolved.”<sup>219</sup>*

**247.** The WLGA suggested that “a centralised national I.T platform linked to the registration process would appear to be the way forward for the gathering and sharing of information with key partners.”

**248.** In terms of how the information sharing would happen in practice, a Welsh Government official added that it would “depend on how operational procedures are developed in practice.” He noted that an integration of digital systems would probably be the most efficient, and “it requires a certain element of development of systems along a wide range of bodies.”<sup>220</sup>

**249.** The WRA later confirmed:

*“as it becomes firmer as to what the service design looks like, exactly what information we will have, how we can involve third parties in that, how we share that data, who we might need to share that with—all that detail and the technicalities as to ‘how’ need to be worked through.”<sup>221</sup>*

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<sup>218</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 83](#)

<sup>219</sup> [Letter from the South Wales Fire and Rescue Service, 14 November 2025](#)

<sup>220</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 85](#)

<sup>221</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 198](#)

## Contract terms

**250.** Section 41 sets out that a "visitor accommodation contract" refers to a contract that entitles a visitor to stay in or at regulated visitor accommodation for no more than 31 nights (whether or not they are consecutive) and contains exclusions from that definition such as contracts for services or a contract of apprenticeship.

**251.** Section 42 provides that an implied term of a visitor accommodation contract is that the accommodation must be "fit for visitor accommodation" at any time a visitor is entitled to stay at the accommodation.

**252.** On the practical effect of section 42, WTA and North Wales Tourism indicated they were content with the wording,<sup>222</sup> however Airbnb suggested "it's very unclear about what that means in practice".<sup>223</sup> Booking.com agreed, and added:

*"... we need to be making sure that these provisions within the Bill are incredibly clear so that operators know what is required of them".*<sup>224</sup>

**253.** The STAA said they had "no concerns" on the principle of section 42, but added:

*"However, if the scope of the fitness standards remain as wide and subjective as they are, we would need to revisit this wording."*<sup>225</sup>

**254.** MWT Cymru requested that a safeguard should be added "to prevent multi-claim liability and insurance conflict". They suggested:

*"Section 42 currently allows multiple parallel contractual claims from a single party booking because any visitor can rely on the fitness term even if they are not a contracting party. This conflicts with how public liability 3 insurance and standard accommodation contracting operate, where the contract sits between the named booker and the provider."*<sup>226</sup>

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<sup>222</sup> Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraphs 348 and 545

<sup>223</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 150

<sup>224</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 152

<sup>225</sup> Additional evidence – Short Term Accommodation Association (STAA)

<sup>226</sup> Additional evidence – MWT Cymru (Mid Wales Tourism)

**255.** A Welsh Government official explained:

*“The intention behind section 42 was, firstly, to incentivise good behaviour in the same way as the licensing regime does. And, secondly, to the extent that there would be any doubt as to the contractual remedy that an individual has, this just makes it clear insofar as the fitness for visitor accommodation is concerned, with the aim being that, because this is an explicit requirement in all cases, if there is a breach, then the visitor accommodation provider should understand that they wouldn’t realistically have a defence to it, and would be incentivised to make some sort of financial contribution or refund to the visitor.”<sup>227</sup>*

## Our view

### Definition of visitor accommodation

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We note the Cabinet Secretary’s reasoning for the initial focus of the Bill on self-contained, self-catering accommodation, and that section 5 provides for the Welsh Ministers to add “any other description of visitor accommodation” by regulations. This flexibility will be key in responding to the data produced by the register and adapting to the visitor accommodation landscape. Given the potential widening in the scope of the Bill that could be brought about by the use of this power, and to ensure the Senedd is given time to consider the potential sector impacts, we believe that regulations under section 5 should be subject to a minimum period of scrutiny.

The short term letting of spare rooms can play an important role in the tourism economy and should be considered as part of any proposals for future expansion of the licensing scheme. While we acknowledge that this could be complex to include and implement, we note the concerns raised that there can be a higher risk among room rentals. We face the difficulty of not having taken more detailed evidence on this matter, and in the time available we have not been able to consider it further, but it is clear that a majority of witnesses consider this an important part of creating a level playing field.

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<sup>227</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 535

**Recommendation 9.** The Welsh Government should consider amending the Bill at Stage 2 to ensure an appropriate minimum time period for Senedd consideration of regulations proposed under section 5.

### **Fitness of visitor accommodation**

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There is some disquiet among witnesses around the general standard provided for in section 7. Clear guidance will be needed to ensure consistency in interpretation and that operators understand their obligations. We note comments from witnesses that mechanisms are already in place to deal with issues such as waste management and anti-social behaviour, but believe these should also be addressed in the code of practice issued under section 3, to reinforce the messaging of these obligations to operators. The Explanatory Memorandum should also provide an explanation of the licensee's obligations to dispose of visitors' waste in line with a local authority's rules, including the use of business waste services and not residential waste.

We note the specific standards and the Cabinet Secretary's comments that this keeps the provisions simple for visitor accommodation providers, who should already be complying with at least four of the five standards proposed in the Bill. We are content that this is a reasonable and proportionate approach. However, we also note that the Bill contains provision for these standards to be amended or added to by future regulations. While we did not have time to consider the potential impacts of including energy performance certificates as an additional standard, this is an area that should be explored by the Welsh Government as it considers future changes to policy.

We also note the concerns raised by the fire and rescue services that the standards could see an increase in need for fire risk assessors. If providers are already complying with this standard, we consider that any such increase might be small. However, the Welsh Government should engage with the fire and rescue services throughout the process so any uptake in demand can be appropriately managed.

We note the Welsh Government's response to the specific points raised by the fire and rescue services and, further, that Welsh Government officials will be reviewing the requirements in section 9, with a view to potential amendments at Stage 2 to ensure it better reflects existing obligations under the Fire Safety Order.

**Recommendation 10.** The Welsh Government should ensure that guidance issued under section 55 addresses visitor accommodation providers' obligations in relation to the general fitness standard in section 7.

**Recommendation 11.** The Welsh Government should address waste management and anti-social behaviour issues in its code of practice, to ensure that operators are aware of their responsibilities and, further, should amend the Explanatory Memorandum to set out the licensee's existing obligations relating to the disposal of visitor waste.

**Recommendation 12.** The Welsh Government should consider including energy performance certificates as an additional standard when exploring future updates to the licensing scheme.

**Recommendation 13.** In advance of the Stage 1 debate, the Cabinet Secretary should confirm whether he intends to bring forward amendments at Stage 2 to in relation to the proposed fire prevention standard in section 9.

## **Licensing: procedure and training requirements**

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There was clear support for the scheme to have a “single licensing authority”, and we note the Cabinet Secretary’s clarification about using different public bodies for different elements of Bill’s implementation. However, we are concerned about the preparedness of the Welsh Revenue Authority as its work towards developing the licensing system seems to be at a very early stage. With more time, we would have liked to test some of the assertions made by the Welsh Revenue Authority. This work should be carefully monitored, and we would therefore call on the Welsh Revenue Authority to provide regular updates to a relevant committee of the next Senedd.

We welcome the Cabinet Secretary’s comments that any training should be proportionate. To enable people to comply with a new piece of legislation, training will be an important part of the process. An online guide, as suggested by some witnesses, could be an easy and accessible route for providers to carry out their training requirements. It is important that the detail is worked through with engagement from the sector, to identify best practice and to ensure that any training requirement does not become burdensome on providers, to the point of deterring potential entrants to the sector. We note that the detail of the requirement will be set out in regulations which will be subject to consultation.

In terms of the use of artificial intelligence to assist with licence applications (“AI”), we note that the Welsh Revenue Authority is carrying out some work looking into what may be possible. While some witnesses were sceptical of a reliance on AI in the licensing process, this is clearly an area where technology could be applied if the time is taken to develop it properly. We note the example given of the Land Registry and would also suggest that a system such as the one used by the DVLA could be comparable, given the electronic linking up of documents that it necessitates. However, this will be a substantial piece of work and it will need to continue at pace if it is to be fully functional in time for the Bill’s implementation.

We note the comments made by the Short Term Accommodation Association in relation to the amount of time it will take for a licence to be processed, in particular their concern at the comparison made with licences issued by Rent Smart Wales. This data needs further clarification by the Cabinet Secretary, including any estimate that has been made of the length of time it will take to process and issue the estimated 30,000 visitor accommodation licences that will need to be issued in the first year of operating the licensing scheme.

We have considered the evidence presented to us on the length of a licence term and we note concerns from providers about the disadvantages of a one-year licence. It was suggested that the default position of a one-year licence does not reflect the way the sector operates, with a number of operators noting that they regularly take bookings up to two years in advance.

We note witnesses' concerns that the Bill lacks sufficient clarity on the complaints process, and that further information is required. We agree that this part of the Bill does not include adequate detail, and we would therefore ask the Cabinet Secretary to provide a full explanation of the intention for the complaints process as provided for in section 22.

**Recommendation 14.** The Welsh Revenue Authority should commit to providing regular updates on its work relating to the register and the licensing scheme to a relevant committee of the next Senedd.

**Recommendation 15.** In advance of the Stage 1 debate, the Cabinet Secretary should review the additional evidence provided by the Short Term Accommodation Association and confirm the average number of total licences that Rent Smart Wales deals with each year and the time taken to process applications at present. The Cabinet Secretary should also set out any estimate he has made of the length of time it will take to process and issue the estimated 30,000 visitor accommodation licences that will need to be issued in the first year of operating the licensing scheme.

**Recommendation 16.** The Welsh Government should amend the Bill at Stage 2 to extend the minimum period for which a visitor accommodation licence may be granted.

**Recommendation 17.** In advance of the Stage 1 debate, the Cabinet Secretary should provide further information to the Senedd about how the provision for complaints in section 22 is expected to work in practice, including how complaints will be assessed and what the practical effect will be of a complaint being upheld.

## **Enforcement**

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It is evident that there is a lot of detail still to be worked through before the Bill's implementation. We are disappointed that there is not yet a clearer position on which enforcement responsibilities will fall to which bodies, and we were surprised that there does not yet appear to have been any constructive engagement with local authorities on this aspect of the Bill.



We agree with comments from the WLGA that local authorities will be best placed to act in this area, but we also acknowledge that linking up between the bodies involved may prove challenging. We heard that the WLGA would “object strongly” to the idea of Visit Wales potentially taking an enforcement role. Given this is directly at odds with the suggestion of the Cabinet Secretary, there is clearly a great deal of work for the Cabinet Secretary to do in agreeing with partners how these key provisions will be implemented in practice.

This example is emblematic of the problems associated with the Welsh Government’s chosen approach of introducing the Bill to the Senedd when so much detail in terms of how the Bill would operate in practice is yet to be agreed. Any enforcement activity will have an impact not just on resource but also on capacity. While we note that the provisions of the Bill are not intended to come into effect until 2029, it is vital that these details are considered thoroughly in advance, through engagement with all involved. These discussions should be starting at the earliest opportunity, to ensure that any changes are planned for in advance.

We heard some concerns from witnesses about the provisions for entry and inspection. However, we also acknowledge the Welsh Government’s intention to take a ‘stepped’ escalatory approach to enforcement.

**Recommendation 18.** In advance of the Stage 1 debate, the Welsh Government should update the Committee on discussions with local authorities as to their potential role in the enforcement process, and clarify the potential role Visit Wales might play.

## **Fees**

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The majority of witnesses were unconvinced about the assumption of a £75 fee, and it is clear that this is a key area of concern for operators. However, we also recognise the duty on the Welsh Government to set up a fee that is for cost recovery purposes only, and that this will only be determined at a later date when further data is available about the number of visitor accommodation providers to which the licensing will apply, and the systems set up to process their applications.

This uncertainty will be a cause for concern for many operators, possibly to the detriment of the industry, and we therefore welcome the Cabinet Secretary’s comments regarding scrutiny of the regulations which will set the fee. We agree that those regulations should be subject to an enhanced form of scrutiny.

**Recommendation 19.** The Welsh Government should bring forward an amendment to the Bill at Stage 2 to provide that the regulations made under section 38 will be subject to the Senedd approval procedure.

### **Contract terms**

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We note the provision in section 42, and that witnesses did not appear to be clear about its purpose. While we also note the Welsh Government's explanation of the intention behind it, further detail is required to ensure that operators fully understand this provision.

**Recommendation 20.** In advance of the Stage 1 debate, the Welsh Government should set out in further detail how the provision in section 42 is intended to work in practice, including its justification for the inclusion of 42(4).

## 6. Provision of information to the public about visitor accommodation

### Visitor accommodation directory

**256.** Section 45 places a duty on both the WRA and the Welsh Ministers to jointly produce a publicly accessible electronic directory of premises at which visitor accommodation is provided in Wales. According to the Explanatory Notes:

*“... the combined directory will allow members of the public, as well as organisations and bodies with an interest in the sector, to access information such as whether a particular premises is registered and/or licensed, the name of the business or individual who provides the accommodation, and whether any special licensing conditions are in place, should these be introduced in future”.<sup>228</sup>*

**257.** The BH&HPA highlighted that, “given that the licensing system will operate via the same online platform as the registration and levy scheme, it is essential that the digital framework clearly distinguishes between regulated and exempt accommodation to avoid licensed parks being prompted to register or apply unnecessarily”. They also suggest that clear and accessible guidance from the Welsh Government “will be essential to ensure consistent application of exemptions across Wales”.<sup>229</sup>

**258.** The FSB was supportive of the intention for the licensing applications to be done via the same platform as registration but noted they “would welcome more detail on plans for a digital platform and its design”.<sup>230</sup>

**259.** According to the WRA the work to develop the national register (as required by the VARL Act) is progressing well. The WRA intends to allow visitor accommodation providers to register from the Autumn of 2026, following a private beta in June 2026.<sup>231</sup>

**260.** Regarding the development of the online licensing platform, the Interim Chief Executive Officer of the WRA confirmed:

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<sup>228</sup> Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, Explanatory Memorandum, Explanatory Notes

<sup>229</sup> Written evidence: DTRVA 21 - British Holiday and Home Parks Association

<sup>230</sup> Written evidence: DTRVA 01 - FSB Wales (Federation of Small Businesses)

<sup>231</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 182

*“The register will be up and running from next year, and then we’ll just have to do some tweaks and put on the elements for licensing. So, the register will be there a good few years before licensing comes on board, and then, as I say, we’ll do whatever tweaks we need to do to fit in the extra licensing elements of that register. We’re confident that we’ve got enough time for that.”<sup>232</sup>*

## Advertising and marketing

**261.** Section 46 requires all visitor accommodation providers, regardless of the type of accommodation, or anyone who advertises it on their behalf, to include a valid premises registration number in all advertising and marketing. They must also include instructions on how to access information about the premises in the visitor accommodation directory.

**262.** Section 47 makes it an offence to fail to comply with section 46 without reasonable excuse. A person guilty of an offence under section 47 is liable on summary conviction to a fine.

**263.** MWT Cymru noted their support for the requirement for each business to display its number but argued that “the legal duty must lie with the accommodation provider, not with third-party websites or DMOs.” They referred to experiences in other countries, noting:

*“Major global booking channels (e.g., Airbnb, Booking.com) have shown in Spain and other countries that they are not afraid to remove listings they cannot verify. In Spain, over 53,000 listings were removed in 2025 for lacking verifiable registration numbers.*

*If similar requirements were introduced in Wales without a robust verification system, this could severely impact Welsh tourism visibility.”<sup>233</sup>*

**264.** MWT Cymru later added “The technicalities and system architecture that you’ll have to get to be able to update matching a licence to a database or a DMO site or an online travel agent site, whatever we’re talking about, is incredibly complex and expensive.”<sup>234</sup>

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<sup>232</sup> Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 234

<sup>233</sup> Written evidence: DTRVA 26 – MWT Cymru (Mid Wales Tourism)

<sup>234</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 264

**265.** Airbnb said they had “extremely serious concerns about how the Welsh Government envisages the role of booking platforms and intermediaries when it comes to enforcement”. They explained:

*“Under sections 46 and 47, the bill would make platforms (and their senior officers) liable for a VAP’s failure to display an accurate registration number, to link to the visitor accommodation directory, and any other display requirements on their accommodation listing ‘in a form specified by Welsh ministers’. These proposals were communicated to us at an extremely late stage (one week before introduction of the bill to the Senedd), with no prior consultation or discussion.*

*Platforms do not have the ability to determine whether a registration number inputted by an VAP is correct. While we note comments from the WRA that the register will be public and platforms could check whether the number on a listing matches the details on the registration scheme, they do not appear to be familiar with the significant technical and resource difficulties involved in implementing this, which could have been highlighted had they requested input from us before publication of the bill.”<sup>235</sup>*

**266.** The STAA agreed that “it should be a responsibility of the visitor accommodation provider to put in an accurate number” and noted that “it is an unusual requirement versus other markets”.<sup>236</sup>

**267.** Travel Chapter suggested:

*“Platforms, agents and property managers need a scalable way to verify registration numbers; manual checks per listing are infeasible to be able to comply with section 47 of the Bill.”<sup>237</sup>*

**268.** The WRA said:

*“We’ve had some good discussions with the online travel agents and they’re keen to help, and they’ve done this throughout the world, so it’s not—. What we’re suggesting isn’t anything new and they’re quite comfortable, I think, with having a registration*

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<sup>235</sup> Written evidence: [DTRVA 12 - Airbnb](#)

<sup>236</sup> [Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 489](#)

<sup>237</sup> Written evidence: [DTRVA 18 - Travel Chapter](#)

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*number. ... we can put things in place where they can check that that's correct, they can validate it."*<sup>238</sup>

**269.** However, the STAA disagreed with this position, and noted that they had since spoken to the WRA "to discuss how it might work".<sup>239</sup> Airbnb said they did not "recognise" the comments made by the WRA "as an accurate reflection of their conversations with us or the view they expressed that solutions to this are relatively easy."<sup>240</sup> They later shared further evidence setting out more detail behind their concerns, including the technical challenges associated with the suggested approach.<sup>241</sup>

**270.** Booking.com highlighted their existing processes to remove unlawful or non-compliant listings and added:

*"We take compliance seriously and are in discussions with the Welsh Revenue Authority on steps to minimise errors in registration-number entry with a meeting having taken place on Tuesday 25 November following our evidence session and further discussions planned."*<sup>242</sup>

**271.** The Cabinet Secretary was clear that "online platform providers do have a responsibility to make sure that the information they provide to potential visitors is accurate", but noted that "Nobody should believe that they are in danger of criminal prosecution for making a mistake".<sup>243</sup> He later added:

*"We are very happy to go on having conversations with them to make sure that they can meet their obligations in a way that fits in with their model in the best way possible. But what they won't be able to do is escape their obligations."*<sup>244</sup>

**272.** A Welsh Government official highlighted that the offence as provided for in section 47 "is subject to the defence of a reasonable excuse", noting that "if what they have done is reasonable insofar as ensuring that the right information is available, they will not have committed an offence". But he added:

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<sup>238</sup> [Economy, Trade and Rural Affairs Committee, 5 November 2025, RoP, paragraph 225](#)

<sup>239</sup> [Economy, Trade and Rural Affairs Committee, 13 November 2025, RoP, paragraph 496](#)

<sup>240</sup> [Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 30](#)

<sup>241</sup> [Additional evidence - Airbnb](#)

<sup>242</sup> [Additional evidence - Booking.com](#)

<sup>243</sup> [Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 489](#)

<sup>244</sup> [Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 491](#)

*“There will be some obligation on them to make sure that they’ve got the right information within that test of reasonableness”.<sup>245</sup>*

**273.** Responding to whether there was a risk that booking sites might withdraw from the Welsh market because it is not a liability to which they are exposed in other markets that have a licensing scheme, the Cabinet Secretary said:

*“I would take it with a very significant pinch of salt. I do not believe that just needing to be accurate in the information you offer to the public is a reason why someone would take their business away from Wales and lose all of the profits they make in the process.”<sup>246</sup>*

## Our view

### Visitor accommodation directory

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We note the support from witnesses for the establishment of a directory, and we are content with the provisions in this regard. Further, we note the comments by the WRA in terms of getting the directory established, and how the system for the register can be adapted to suit need.

### Advertising and marketing

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We heard the concerns of platforms such as Airbnb and Booking.com in relation to the proposed offence in section 47, and that this approach differs from that in other markets. It is important that Wales is not put at a disadvantage as a result of these provisions. We also note calls from witnesses that responsibility for information provided should lie with visitor accommodation providers; we note that the Cabinet Secretary appears to have discounted these. The issue of “reasonable defence” requires further clarity. Further discussions are needed between the Welsh Government and the platforms, to ensure that the provisions within the Bill are workable and, if necessary, revised.

**Recommendation 21.** In advance of the Stage 1 debate, the Cabinet Secretary should:

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<sup>245</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraphs 493 and 495

<sup>246</sup> Economy, Trade and Rural Affairs Committee, 20 November 2025, RoP, paragraph 517

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- provide an update on discussions with booking platforms / agents regarding the provisions in sections 46 and 47,
- provide further information on the rationale for extending the proposed offence to bodies other than visitor accommodation providers, and
- provide further information on the specific steps that may need to be taken to establish a defence to the proposed offence.

**Recommendation 22.** The Welsh Government should consider tabling an amendment to the Bill at Stage 2 to limit the scope of the advertising and marketing offence in section 47 to visitor accommodation providers only.

## 7. Further matters

**274.** Following the final scrutiny sessions on the Bill, further evidence was submitted by a number of witnesses. While some of the points raised in the additional evidence related to issues already covered throughout the report, a number of other matters were noted, some of which are highlighted below.

**275.** MWT Cymru called for the Welsh Government to define “reasonable repair time and continuous fitness duties in Sections 15 and 44”. They noted:

*“Without definition, this creates legal uncertainty and will invite disputes even where businesses act responsibly, particularly in rural areas or where contractors are not immediately available. We ask that a clear definition or test for reasonable time is added through regulations or statutory guidance, taking account of seriousness of the defect, interim mitigation, contractor availability, rural and seasonal constraints, and time remaining in the stay. A safe harbour should protect those who act promptly and proportionately.”<sup>247</sup>*

**276.** Booking.com sought clarity on whether the Bill’s purpose is health and safety only, or if it includes housing. In terms of housing, they set out additional points, and argued that housing shortages are multi-factorial, not solely due to short-term lets.<sup>248</sup> PASC echoed concern about the intention of the Bill, and suggested that the Cabinet Secretary’s position had shifted between evidence sessions. They said:

*“Had we all known the dual intent, we would have presented our evidence very differently.”<sup>249</sup>*

**277.** Separately, PASC raised concerns about the provisions in sections 8–12 and their consistency with existing rules.<sup>250</sup> This was also noted by the STAA, who said:

*“We are concerned that the provisions of some of the specific standards are not consistent with current regulations and Welsh Government guidance.”<sup>251</sup>*

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<sup>247</sup> [Additional evidence – MWT Cymru \(Mid Wales Tourism\)](#)

<sup>248</sup> [Additional evidence – Booking.com](#)

<sup>249</sup> [Additional evidence – PASC UK \(2\)](#)

<sup>250</sup> [Additional evidence – PASC UK \(2\)](#)

<sup>251</sup> [Additional evidence – Short Term Accommodation Association \(STAA\)](#)

## Our view

It is a further symptom of the shortened timeline for Stage 1 that we have not been able to scrutinise the additional points raised by witnesses after the completion of our evidence gathering. However, we believe these concerns warrant consideration by the Welsh Government.

**Recommendation 23.** In advance of the Stage 1 debate, the Cabinet Secretary should respond to the specific additional evidence received by the Committee.

## Annex 1: List of oral evidence sessions

The following witnesses provided oral evidence to the Committee on the dates noted below. Transcripts of all oral evidence sessions can be viewed on the [Committee's website](#).

Date	Name and Organisation
<b>5 November 2025</b>	<p><b>Mark Drakeford MS, Cabinet Secretary for Finance and Welsh Language,</b> Welsh Government</p> <p><b>Helen John, Deputy Director, Licensing of Visitor Accommodation,</b> Welsh Government</p> <p><b>Robbie Thomas, Head of Licensing of Visitor Accommodation,</b> Welsh Government</p> <p><b>Dylan Hughes, Legislative Counsel,</b> Welsh Government</p> <p><b>Hannah Starkey, Lawyer,</b> Welsh Government</p> <p><b>Rebecca Godfrey, Interim CEO,</b> Welsh Revenue Authority</p> <p><b>Anthony Pritchard, Chief Digital Officer,</b> Welsh Revenue Authority</p> <p><b>Joseph Dooher, Head of Visitor Levy and National Registration Delivery,</b> Welsh Revenue Authority</p> <p><b>Marc Crothall MBE, Chief Executive,</b> Scottish Tourism Alliance</p> <p><b>Fiona Campbell MBE, Chief Executive,</b> Association of Scotland's Self-Caterers</p>
<b>13 November 2025</b>	<p><b>Councillor Huw Thomas, Leader of Cardiff Council, and Spokesperson for Economy and Energy,</b> Welsh Local Government Association (WLGA)</p> <p><b>Heidi Neil, Directors of Public Protection Wales's Licensing Lead,</b> Welsh Local Government Association (WLGA)</p>

Date	Name and Organisation
	<p><b>Bethan Jones, Operational Manager, Rent Smart Wales and Chair of Environmental Health Wales's Housing Expert Panel,</b> Welsh Local Government Association (WLGA)</p> <p><b>David Chapman, Executive Director,</b> UKHospitality Cymru</p> <p><b>Rowland Rees-Evans, Chair,</b> Wales Tourism Alliance</p> <p><b>Dr Llŷr ap Gareth, Head of Policy,</b> FSB Wales (Federation of Small Businesses)</p> <p><b>Glenn Evans, Chair,</b> North Wales Tourism</p> <p><b>Charlie Reith, Co-Chair of Policy Working Group,</b> Short Term Accommodation Association</p> <p><b>Katherine Squires, Director of Policy &amp; Public Affairs,</b> British Holiday and Home Park Association</p>
20 November 2025	<p><b>Barbara Griffiths,</b> North Wales Holiday Cottages</p> <p><b>Carl Thomson, Public Policy Manager (UK),</b> Airbnb</p> <p><b>Fiona MacConnacher, Head of Public Affairs UK and Ireland,</b> Booking.com</p> <p><b>Emma Thornton, Chief Executive,</b> Visit Pembrokeshire</p> <p><b>Nicky Williamson, UK Director for Wales,</b> Professional Association of Self-Caterers UK</p> <p><b>Zoë Hawkins, Chief Executive,</b> MWT Cymru (Mid Wales Tourism)</p> <p><b>Mark Drakeford MS, Cabinet Secretary for Finance and Welsh Language,</b> Welsh Government</p> <p><b>Helen John, Deputy Director, Licensing of Visitor Accommodation,</b> Welsh Government</p> <p><b>Robbie Thomas, Head of Licensing of Visitor Accommodation,</b> Welsh Government</p> <p><b>Dylan Hughes, First Legislative Counsel,</b> Welsh Government</p> <p><b>Emma Anderson, Lawyer,</b> Welsh Government</p>

## Annex 2: List of written evidence

The following people and organisations provided written evidence to the Committee. All Consultation responses and additional written information can be viewed on the [Committee's website](#).

Reference	Organisation
<b>DTRVA 01</b>	FSB Wales (Federation of Small Businesses)
<b>DTRVA 02</b>	National Trust
<b>DTRVA 03</b>	Philip Caldwell
<b>DTRVA 04</b>	Individual
<b>DTRVA 05</b>	Individual
<b>DTRVA 06</b>	ScoutsCymru
<b>DTRVA 07</b>	Individual
<b>DTRVA 08</b>	Martyn Brookes
<b>DTRVA 09</b>	Beach View Cottages
<b>DTRVA 10</b>	Torfaen Ltd
<b>DTRVA 11</b>	Electrical Safety First
<b>DTRVA 12</b>	Airbnb
<b>DTRVA 13</b>	Cymdeithas yr Iaith
<b>DTRVA 14</b>	Awaze
<b>DTRVA 15</b>	Sykes Holiday Cottages
<b>DTRVA 16</b>	Professional Association of Self-Caterers, UK (Cymru)
<b>DTRVA 17</b>	Country Land and Business Association (CLA Cymru)
<b>DTRVA 18</b>	Travel Chapter
<b>DTRVA 19</b>	Caravan and Motorhome Club
<b>DTRVA 20</b>	Short Term Accommodation Association (STAA) (I)
<b>DTRVA 21</b>	British Holiday & Home Parks Association
<b>DTRVA 22</b>	Welsh Local Government Association (WLGA)

Reference	Organisation
<b>DTRVA 23</b>	Short Term Accommodation Association (STAA) (2)
<b>DTRVA 24</b>	Association of Scotland's Self-Caterers Scottish Tourism Alliance
<b>DTRVA 25</b>	North Wales Tourism
<b>DTRVA 26</b>	Mid Wales Tourism (MWT Cymru)
<b>DTRVA 27</b>	South Wales Fire and Rescue Service
<b>DTRVA 28</b>	Propertymark
<b>DTRVA 29</b>	Mid and West Wales Fire and Rescue Service
<b>DTRVA 30</b>	Farmers' Union of Wales (FUW)
<b>DTRVA 31</b>	Visit Pembrokeshire
<b>DTRVA 32</b>	Booking.com
<b>DTRVA 33</b>	West Wales Holiday Cottages
<b>DTRVA 34</b>	Swansea Council

## Additional Information

Title	Date
Welsh Revenue Authority	11 November 2025
Association of Scotland's Self-Caterers and Scottish Tourism Alliance	12 November 2025
Farmers' Union of Wales (FUW)	14 November 2025
Letter from the Cabinet Secretary for Finance and Welsh Language	18 November 2025
Letter from the Cabinet Secretary for Finance and Welsh Language	27 November 2025
North Wales Holiday Cottages	27 November 2025
Airbnb	28 November 2025
Booking.com	28 November 2025
MWT Cymru (Mid Wales Tourism)	28 November 2025
PASC UK (1)	28 November 2025
PASC UK (2)	28 November 2025
Rent Smart Wales	28 November 2025



<b>Title</b>	<b>Date</b>
Short Term Accommodation Association (STAA)	28 November 2025