

# **Consultation on the general principles of the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill**

## **Submission from Swansea Council**

### **1. What are your views on the general principles of the Bill, and whether there is a need for legislation to deliver the stated policy intention?**

Swansea Council supports the general principles of the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill and believes legislation is necessary to achieve its aims. The introduction of a licensing regime and a public directory will provide accurate data on bed stock, including undeclared accommodation, which is vital for effective destination management and strategic planning.

Bedstock data is a key input for STEAM (Scarborough Tourism Economic Activity Monitor), which is an economic model that provides statistics on the volume and value of tourism to an area, so accurate bedstock information is vital in order to achieve a clear picture of tourism at a local level. The economic value of tourism (provided by STEAM) is a KPI of Swansea Council.

This transparency will help us understand the true scale of the sector and manage visitor flows responsibly. We also welcome the Bill's role in creating a level playing field for accommodation providers who operate ethically and invest in quality and required health and safety standards, ensuring fairness and consistency across the industry. Voluntary schemes have not delivered universal compliance, so statutory measures are essential to protect consumer confidence, uphold safety standards, and maintain Wales' reputation as a high-quality destination. Overall, the Bill represents a positive step towards sustainable tourism development and fair competition within the sector, whilst providing Local Authorities with a clearer picture of Bedstock at a local level.

### **2. What are your views on the Bill's provisions, including whether they are workable and will deliver the stated policy intention?**

We believe the Bill's provisions are broadly workable and will deliver the stated policy intention if implemented with clear guidance and proportionate requirements. The licensing regime and directory will improve transparency and consumer confidence, while aligning standards with the private rented sector ensures consistency. However, success depends on a streamlined application process, affordable fees, and robust communication to avoid placing undue burden on small operators.

Also, LAs do not have the resources or capacity to deal with the proposed Licensing Scheme requirement and this would require additional funding to resource.

The legislation setting out the inspection regime, to ensure that the standards of Private Rented Sector properties, does not include guest accommodation of this type and so outside the remit for the Private Sector Housing Team.

Further details will need to be provided from WG to set out the extent to which the requirements of housing standards will go.

**3. In your view, are there any potential barriers to the implementation of the Bill's provisions?**

The main barriers include administrative complexity for smaller or micro businesses, limited digital access for some providers, and the capacity/ability to enforce compliance effectively. Without adequate resourcing and support, enforcement could be inconsistent, undermining confidence in the system. Clear timelines, training, and transitional arrangements will be essential to overcome these challenges. It will also be important to monitor the cumulative impact of the Bill and the other policies (such as the 182-day rule, tourism levy etc.) on the viability of the businesses and assess if there is there a risk that smaller or occasional accommodation providers will leave the market due to new requirements.

**4. Do you feel there will be any unintended consequences arising from the Bill?**

There is a risk that increased compliance costs could lead some small or occasional providers to exit the market reducing accommodation supply and impacting visitor choice. What are your views on the Welsh Government's assessment of the financial and other impacts of the Bill as set out in Part 2 of the Explanatory Memorandum? (no more than 500 words)

The Welsh Government's assessment appears reasonable, but the cumulative impact of this Bill alongside other measure, such as the 182-day rule, council tax premiums, and potential visitor levies must be monitored. For many small businesses, even modest additional costs can be significant. We recommend ongoing review and support to ensure financial sustainability across the sector.

**5. What are your views on 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)? (no more than 500 words)**

We consider the powers granted to Welsh Ministers to make subordinate legislation appropriate, provided they are exercised transparently and with sector consultation. Flexibility is necessary to adapt standards and processes over time, but changes should be subject to scrutiny to maintain fairness and proportionality.

**6. Are there any other issues you would like to raise about the Bill and the Explanatory Memorandum or any related matters?**

We urge the Welsh Government to ensure that the licensing scheme supports wider destination management goals, including sustainability and the promotion of the Welsh language. Clear bilingual guidance, strong engagement with DMOs, and integration with marketing initiatives will help maximise the benefits of the Bill for both visitors and communities. Communication is key – for both businesses and visitors about the reasons for the scheme. Also communication between Welsh ministers and within LA departments – if Env Health & Housing become responsible for local implementation and delivery.