



Gwasanaeth Tân ac Achub
Canolbarth a Gorllewin Cymru

Mid and West Wales
Fire and Rescue Service

Consultation

November 2025

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

Dear Sir/Madam,

Please find the responses of Mid and West Wales Fire and Rescue Service in relation to the [Development of Tourism and Regulation of Visitor Accommodation \(Wales\) Bill](#).

1. Do you foresee any impact on demand for independent fire assessors resulting from the Bill?

Response

We anticipate that the introduction of the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill will lead to a significant increase in demand for independent fire risk assessors.

The Bill will apply to approximately 24,000 premises across Wales, many of which, such as short-term lets, self-catering units, holiday parks, and guesthouses, are currently outside the scope of routine fire safety oversight. Under the new scheme, accommodation providers will be required to demonstrate compliance with minimum fire safety standards, which may include the provision of a fire risk assessment.

Given that many of these premises are operated by individuals or small businesses without in-house fire safety expertise, it is likely that they will seek support from independent fire risk assessors to meet licensing requirements. This will place increased pressure on the sector to deliver timely and competent assessments, particularly in the lead-up to the scheme's implementation.

We also note that the Building Safety (Wales) Bill is expected to generate additional demand for fire safety expertise, further compounding the need for qualified assessors across Wales. Consideration should be given to the capacity of the fire risk assessment sector to meet this demand, including potential measures to support training, accreditation, and public awareness.



2. Do you have a view on section 20(8) of the Bill, which removes the requirement under article 42(1)(a) of the Fire Safety Order for the Welsh Ministers (as licensing authority) to ensure that a relevant fire and rescue authority has the opportunity to make representations before they issue a licence under this scheme?

Response

Removing the statutory requirement for FRS consultation reduces an important gateway in the consultation process. Our input helps ensure premises meet fire safety standards before occupation. The lack of a formal consultation step with the Fire and Rescue Authorities may reduce the Bills ability to improve public safety. The omission appears inconsistent with the Bill's broader emphasis on information sharing.

However, given that the Bill is expected to apply to approximately 24,000 premises across Wales, many of which are classified as low-risk, such as short-term self-catering units, holiday parks, short-term lets, and small guesthouses. It is the opinion of MAWWFRS, that the requirement for the Fire and Rescue Services to make representations on every initial licence application would place a disproportionate burden on resources. It should be noted that these premises are not routinely inspected under our Risk-Based Inspection Programme, and in most cases, we hold limited or no information about them.

When considering the information provided above, we feel further consideration could be taken to determine the potential risk that Section 20(8) may present. We propose establishing a process that allows Fire and Rescue Authorities to request a licence review when intelligence gathered under existing Regulatory Reform (Fire Safety) Order 2005 workstreams highlights significant risk or non-compliance.



3. In determining a licence application Welsh Ministers will be able to use any information or evidence provided by a fire and rescue authority. Do you have a view on the information sharing provisions in the Bill and how these will work in practice?

Response

We acknowledge the provision within the Bill that allows Welsh Ministers to consider information or evidence provided by Fire and Rescue Authorities when determining licence applications. While we support the principle of inter-agency collaboration, we believe the practical implementation of this provision requires careful consideration.

In practice, Fire and Rescue Services are likely to hold limited or no existing information on the majority of premises that fall within the scope of this Bill. Many of these, such as short-term self-catering units, holiday parks, short-term lets (e.g. Airbnb-style rentals), and small guesthouses, are typically classified as low-risk under our Risk-Based Inspection Programme and are not routinely inspected. As a result, our ability to contribute meaningful data for most licence applications may be limited.

For medium-risk premises, such as hotels and larger guesthouses, some information may be available. However, this is often obtained through local authority licensing consultations rather than through direct inspection or enforcement activity. In these cases, the local authority may already hold the relevant information, and requesting it again from the Fire and Rescue Service could lead to duplication of effort and inefficiencies.

To ensure the information-sharing provisions are effective and proportionate, we recommend that:

- Clear protocols are established outlining when and how Fire and Rescue Services will be asked to provide information;
- Requests are targeted and risk-based, focusing on premises where fire safety concerns are more likely to arise;
- Consideration is given to the resource implications for Fire and Rescue Services, particularly if additional administrative or inspection duties are anticipated.

We are committed to supporting the safe regulation of visitor accommodation in Wales and welcome further dialogue on how best to implement these provisions in a way that is both practical and aligned with our statutory responsibilities.



4. The Bill's accompanying Explanatory Memorandum ("EM") states that "there is currently no data available on the characteristics of premises or levels of compliance with the existing statutory obligations". The EM also refers to "anecdotal non-compliance" with the existing statutory requirements. Does this reflect the fire authority's experience, and do you have a view on the evidence base for the proposals in this Bill?

Response

We acknowledge the statement in the Bill's Explanatory Memorandum that there is currently no comprehensive data available on the characteristics of premises or levels of compliance with existing statutory obligations. This observation aligns with our operational experience across the Mid and West Wales region.

We note the reference to "anecdotal non-compliance" in the Explanatory Memorandum. 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, particularly those operating outside traditional licensing frameworks.



5. Additional Comments

Response

With reference to Section 9 of the draft Bill, we would like to share the following comments:

- Section 9 (2) – The wording of this section leads to the following observation.

The responsibility of the Visitor Accommodation Provider (VAP) is to ensure that a Fire Risk Assessment (FRA) has been undertaken, not to personally conduct the FRA, as the current language in the Bill may imply. According to guidance provided on GOV.UK under Section 159 of the Building Safety Act, individuals are responsible for ensuring their FRA is suitable and sufficient. If a third party is engaged to carry out the assessment, it is recommended that they are competent to do so.

Note: Following consultation with our external Legal Advisor, it is agreed that the duty placed on the VAP is to “ensure that a Fire Risk Assessment (FRA) has been undertaken, not to personally conduct the FRA.” Since the responsibility is a legal one which the VAP can discharge by sourcing a competent fire risk assessor, the preference would be for any duties to be expressly stated, rather than implied, and the placing of this duty on the VAP should be explicitly set out in the Bill.

- Section 9 (3) – Observations around the way fire detection requirements are referenced in this section.

It states that regulated visitor accommodation, whether in a building, mobile home, vessel, or other vehicle, must have at least one functioning smoke alarm installed on each storey. This wording could be interpreted to mean that a single smoke alarm per floor is sufficient, which risks underrepresenting the necessary level of protection. This provision appears to conflict with the guidance outlined in [A Guide to Making Your Guest Accommodation Safe from Fire](#), which holds Article 50 status and is widely regarded as the most appropriate reference document. That guidance specifies the need for heat alarms, and detection in high-risk rooms, including bedrooms to ensure comprehensive coverage. In addition to the statutory guide, British Standard 5839 Part 6 has, since its 2019 revision, also indicated a standard of ‘LD1’ for self catering accommodation (Table 1); in simple terms requiring smoke detectors in most rooms.

Note: Following consultation with our external Legal Advisor, it is suggested that the wording should be tightened to state that there should be the provision of one or more functioning smoke alarms on each floor, in accordance with a suitable and sufficient the fire risk assessment for the premises.

