

## **DTRVA 09 Beach View Cottages**

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Senedd Cymru | Welsh Parliament

Pwyllgor yr Economi, Masnach a Materion Gwledig | Economy, Trade, and Rural Affairs Committee

Bil Datblygu Twristiaeth a Rheoleiddio Llety Ymwelwyr (Cymru) | Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill

Evidence from: Beach View Cottages

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### **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?**

(We would be grateful if you could keep your answer to around 500 words).

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.

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

(We would be grateful if you could keep your answer to around 500 words).

Any Bill is only as good as its implementation and policing. We see some issues with this.

1. To be effective, registration needs to be annual with accommodation providers providing the necessary paperwork to prove Fire Safety compliance, electrical/gas/carbon monoxide safety compliance and insurance. Any serious accommodation provider already has all of this paperwork in place.
2. Monitoring and policing of all other quality standards would require annual access to the property by inspectors. (See hindrance below)
3. Efficacy would also require communication with agencies that market properties (Sykes etc). Such agencies make no quality checks whatsoever take no responsibility for properties and notoriously mismarket properties.

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

(We would be grateful if you could keep your answer to around 500 words).

1. The huge cost of £34+ million to implement this Bill will make huge licensing fees if passed on to accommodation providers. This cost will be passed to the guests. This, together with the proposed Visitor Levy, will result in accommodation in Wales being not competitive. People will holiday elsewhere where the price/performance ratio is better.

2. Inspecting: the Bill will not have the desired impact if properties are not subject to regular inspections.

Problem: properties are required to be let for a minimum of 182 nights. Inspections are obviously not acceptable whilst the accommodation is occupied. This will effectively limit the period of inspection to November to February (excluding Christmas and NY).

The powers of inspection mentioned in the Bill make no provision for visitor protection. To protect guest privacy we would not allow access to our property whilst visitors are in residence. Visitor protection and privacy are paramount to us. Can you even imagine to impact on your holiday being disturbed in this way. We have guests who have been staying with us since we started operations 15 years ago. I guarantee they would not return if subject to such an intrusive violation of their holiday and privacy. We would vehemently oppose inspectors having power of entry at any time. We are VERY happy to be inspected but NOT at the cost of privacy protection.

3. The cost of dealing with non-compliance will also be large and probably not retrievable as indicated.

4. Visitors traditionally want a quaint holiday cottage - with roses round the door. Many Cottages in Wales are stone-built. They are not always suited to the domestic, residential market due to the isolated location or the running costs. They have been well renovated to provide good standard accommodation for the short-stay tourism market but the traditional construction places limits on what can be done to make them suitable for long-term domestic occupation. Unrealistically high, theoretical EPC ratings may not be physically achievable.

4. A "watered-down" Bill would be a waste of money and sector damaging. Either do it effectively or not at all but not in a way that is sector damaging which believe this Bill to be.

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

(We would be grateful if you could keep your answer to around 500 words).

Yes,

1. Accommodation rates will rise to meet additional costs to owners making Wales less attractive to visitors (the Visitor Levy will also have this impact)
2. The number of properties will decline thus diminishing visitor numbers to attractions and eateries, and impact local service providers that owners rely on (cleaners, maintenance people, electricians, plumbers, gardeners .....). Don't repeat Thatcher's mistake! Put other employment opportunities in place before implementing ANYTHING that would reduce visitor numbers.
3. There are currently not enough Fire/Electrical/Gas Safety Officers in Wales to deal with the inevitable demand. Before any such Bill is implemented the Government should ensure that there are adequate numbers of Fire/Electrical/gas Safety Officers in Wales to carry out the necessary inspections. Otherwise the large national companies will step in and more money will flow out of Wales.
4. Visitors will be outraged if their holiday and privacy are violated by inspections. This MUST be performed when the accommodation is empty.

#### **5. 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?**

(We would be grateful if you could keep your answer to around 500 words).

We have read nothing that leads us to understand that they have any comprehension at all of how much this costs an owner.

#### **6. 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)?**

(We would be grateful if you could keep your answer to around 500 words).

Absolutely INAPPROPRIATE with NO regard to visitor privacy or comfort. This would be hugely sector damaging. A clause MUST be inserted that inspections will occur at an agreed time when the property is vacant. We are responsible providers that follow all regulations and guidance but talk of "warrants" is scary and reminiscent of police state measures. We would oppose any such step or we would just give up.

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

(We would be grateful if you could keep your answer to around 500 words).

Please, PLEASE be more aware of the impact all these changes are having. Unlike other areas of the UK where every property that comes on the market is snapped by a holiday company. (See ownership in Cornwall by Aspect Holiday),

Wales self-catering industry is largely operated by families and retirees such as ourselves - all looking to supplement our own incomes. We provide a personal, warm Welsh welcome to our guests. We are proactive in maintaining standards and passionate about supporting our local economies. Due the implementation of 182 we are already seeing corporations hovering. We fear that all of these measures may result in properties being sold and bought up by such anonymous finance companies.

We understand the intention yet this Bill feels heavy handed. We are sure it is not intended to penalise owners that are already compliant and offering good standard accommodation. Yet, this is the impact it will have.

If AirBnB etc are the problem - then a more nuanced approach and communication with them would be better way forward.

We would welcome being involved in any future discussions.