

DTRVA 19 Caravan and Motorhome Club

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 Caravan and Motorhome Club

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).

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 on local communities and infrastructure.

We welcome the focus of the Bill on unregulated short-term visitor accommodation, and the recognition that licensed holiday and touring parks do not fall directly within the scope, and that the Bill excludes premises already subject to existing campsite and caravan site licensing regimes under S269 of the Public Health Act and the Caravan Sites and Control of Development Act 1960 from the definition of regulated visitor accommodation.

This supports the Club's position that overly burdensome licensing could harm small accommodation providers, particularly those who already operate sufficiently under existing regulatory controls and the Club therefore welcomes the inclusion of its campsites within Wales under the registration scheme in the early stages. There are benefits of having a national register and licensing scheme which are focused on standards and the ability to distinguish high-quality providers (such as Club-operated and certificated sites) from informal, low-compliance hosts.

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).

Many of the Club's CL network (small 5-pitch sites) are run as small family businesses or by farmers as a means of diversification and even a light touch licensing or mandatory regime could create disproportionate burdens on operators who already comply with necessary compliance checks in order to operate. The Club would therefore emphasise again the distinction between accommodation types which fall within or out of scope.

Clear and accessible guidance will be essential to ensure that accommodation providers can quickly identify whether they are exempt from the licensing regime.

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).

There is the potential for local authorities to require thorough preparation for the administration of multiple licensing regimes, and to fully and competently understand the subtle distinctions between them in order not to unnecessarily place burdens on those accommodation providers who do not fall within the remit of the scheme.

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).

Again, there is the risk of unequal implementation across Wales given the ability for local authorities to determine whether to implement the levy and this could create competitiveness between regions across Wales.

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).

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).

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).

In summary, the Club supports regulation that raises standards across the sector, and advocates for a simplified and low cost registration path for small sites such as Certificated Locations, as well as recognition of the existing inspection and quality frameworks which exist within the Club to offer high quality and safe accommodation to its members and welcomes the opportunity to consult sector-wide before regulatory changes come into effect. There is pressure for the Bill to avoid creating or widening loopholes whereby informal operators are able to bypass registration, levy requirements or safety compliance. Clear definitions of visitor accommodation should be maintained to ensure an equitable regulatory environment.

To ensure the legislation strengthens Wales's visitor economy without unintended consequences, we would encourage Welsh Government to adopt proportionate regulation for small businesses/CLs, affordable and consistent levy arrangements, fair competition through robust enforcement, clear timelines and practical guidance and collaborative engagement with sector bodies.

The Club is ready to work with the Welsh Government and local authorities to help deliver a robust, equitable and futureproof framework for visitor accommodation in Wales.