

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

**Written Evidence for the Economy, Trade and Rural Affairs Committee**

**British Holiday & Home Parks Association**

## **Response from the British Holiday & Home Parks Association**

The British Holiday & Home Parks Association (“BH&HPA”) is the UK national trade body representing owners and managers of caravan holiday, residential and chalet parks and campsites for tents. This consultation response uses the collective term “park businesses” for our members, whatever form(s) of accommodation they provide. As of October 2025, there are 468 holiday and touring park businesses within BH&HPA membership in Wales providing 59,717 pitches. The holiday parks sector has a long history of offering careers for those seeking to work in the great outdoors and is often the key employer in many coastal and rural communities.

Findings from the UKCCA Economic Benefit Report for Holiday Parks and Campsites in Wales (<https://www.ukcca.org.uk/media/yhhh1nfk/ukcca-wales-report-2024.pdf>) published in February 2024 demonstrated that visitor expenditure generated by holiday parks and campsites in Wales amounts to £1.66bn, which is equivalent to £945.9m GVA and supports 30,726 FTE (full-time equivalent) jobs. Visitors to Welsh holiday parks and campsites stayed 107% longer and spent 14% more than the Welsh tourism averages. Welsh holiday parks and campsites offer a wide range of accommodation options to visitors, which allows it to serve a diverse range of customers’ tastes and budgets. These include touring pitches for caravans, campervans, motorhomes and tents; owner-occupied holiday caravans and lodges; and rented holiday caravans and lodges, apartments, chalets, wigwams, pods and yurts.

Holiday park and campsite operators support their local communities through:

- expenditure – 31% from the total survey sample cumulatively spent £13.4m per year in capital expenditure, operating expenditure, wages and salaries
- local community engagement – including hosting community events, promoting local business and causes, and fundraising for charities
- environmental activities – including support for recycling and biodiversity, water and energy conservation initiatives, renewable energy adoption and participation in the Green Tourism award scheme
- health and wellbeing – including providing cycle paths, promotion of wider community health and fitness sessions and healthy food options provided on-parks

### **General principles**

1. BH&HPA welcomes the Bill’s focus on unregulated short-term visitor accommodation and that licensed holiday, and touring parks are not directly in scope of the new licensing framework.
2. This distinction helps close the existing policy gap by targeting areas where oversight is limited, such as the short-term lets sector. It recognises that licensed parks already provide the level of safety, oversight and visitor assurance that the new regime seeks to deliver and are already subject to strict regulation in doing so.

3. The Bill excludes premises already subject to existing campsite or caravan site licensing regimes under section 269 of the Public Health Act 1936 and Part 1 of the Caravan Sites and Control of Development Act 1960 from the definition of 'regulated visitor accommodation', for the purpose of the licensing regime.
4. This approach is welcomed by the Association as it avoids duplication of existing requirements that govern safety, spacing, and inspection from local authorities, for licensed holiday park businesses.
5. This approach reflects BH&HPA's long-standing position in previous Welsh Government consultations that regulatory effort should be directed at unregulated or temporary accommodation providers, not at well-regulated park businesses. Duplication would be disproportionate for small and medium enterprises and add bureaucracy for authorities without added safety benefit.
6. This approach aligns with the position taken in Scotland, where licensed caravan and camping sites are expressly excluded from the national short-term let licensing scheme introduced in 2022, recognising the sufficiency of existing regulatory controls."

*"If you provide licensed caravans [\[41\]](#), you are not providing short-term lets."*

*(Source: [Scottish Government, "Short-term lets: licensing guidance part 1 – guidance for hosts and operators", Annex A](#))*

7. Paragraph 3.18 of the Bill's explanatory memorandum highlights the issues with high concentrations of holiday lets within some Welsh communities, mainly that traditional housing stock decreases alongside issues with parking. Licensed holiday park businesses help preserve traditional housing stock by offering dedicated tourism accommodation, often on the periphery of tourism hotspot towns, serving Welsh communities with visitor spend rather than depriving them of housing stock and on-street parking.
8. Additionally, paragraph 3.20 notes that while self-catering properties make up around 73% of accommodation establishments ([Wales bed stock data 2022](#)), they account for far fewer total bedspaces than licensed caravan and camping sites or hotels. This distinction is important as park businesses already operate within established licensing and inspection regimes, are easily identifiable to local authorities, representing some of Wales's largest and most compliant accommodation providers. The Bill rightly focuses on unregulated, harder-to-track self-catering lets.
9. Therefore, it is logical that licensed park businesses are not included within the definition of 'regulated tourism accommodation' as they neither require further regulation nor are the intended recipient of the Bill's purpose and the issues it aims to address.

10. The Bill includes a power to extend the definition of regulated visitor accommodation to allow other types of accommodation to be brought into the scheme in future. Expanding the framework to licensed caravan and camping sites would be beyond its intended purpose of improving oversight of unregulated short-term lets and would introduce uncertainty and hinder business growth in parts of the sector that already operate responsibly under strict regulation.
11. Extending regulation where no clear policy gap exists risks creating new administrative burdens for both operators and local authorities, diverting resources from the scheme's core objectives. The current local authority licensing and inspection regime already provides effective, place-based oversight, and should remain the mechanism for ensuring standards in licensed park accommodation.

### **The Bill's implementation**

12. 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
13. Clear and accessible guidance will be essential to ensure consistent application of exemptions across Wales. The Welsh Government should set out, in advance of implementation, how local authority officers, booking platforms and accommodation providers can quickly confirm when a visitor accommodation provider is exempt from the licensing regime. One recommendation should be to check the local authority's public register of licensed caravan and tented campsites, which is often readily available online. This would reduce the risk of inconsistent interpretation between local authorities and prevent unnecessary compliance requests being directed at licensed parks that already meet established safety and inspection standards.
14. While booking platforms are not a core target of the legislation, the memorandum implies they'll have a compliance role. Without clear Government direction, exempt accommodation providers could face requests for documentation that doesn't apply to them, adding unnecessary correspondence and risk of delisting.
15. In addition, the operation of a shared digital platform between the registration, levy and licensing schemes must not result in chargeable processes for exempt businesses. System access, data handling or verification costs should not apply to operators who fall outside the scope of regulation. Ensuring that exempt businesses are not drawn into administrative or financial processes intended for regulated accommodation will help maintain confidence in the proportionality of the scheme.

## **Reserve powers and future certainty**

16. The Bill provides Welsh Ministers with powers that would allow them, in future, to amend or replace existing licensing regimes, including section 40 on special provision for campsites and caravan sites, and section 57 which enables consequential amendments to other enactments such as the Caravan Sites and Control of Development Act 1960. BH&HPA is opposed to the inclusion of these powers. They are unnecessary given the Bill's stated purpose and the proposed exclusion from scope of licensed caravan and camping sites. They also risk creating additional administrative complexity for businesses and local authorities.
17. Licensed parks already operate within a long-standing framework that ensures high safety and compliance standards through regular inspection and engagement with local authorities. Introducing the possibility of additional regulation where no clear policy gap exists would add bureaucracy for responsible operators without delivering any improvement in safety, oversight or visitor assurance.
18. Local authorities would also be drawn into administering overlapping regimes, continuing to handle planning, site licensing and enforcement responsibilities while adapting to a new national framework that adds limited benefit for established, compliant tourism businesses. This would consume resource that is already stretched, reducing local authority capacity and subsequently their responsiveness to local businesses.
19. Removing this provision would enable the Bill's emphasis on proportionality to remain focused on genuinely unregulated accommodation, minimising burdens on local government and ensuring that implementation supports Wales's established tourism base rather than constraining it.
20. If Welsh Ministers were to retain such powers, which BH&HPA argues is unnecessary given the general principles of the Bill to capture unregulated visitor accommodation, then Welsh Government should be required to consult with all stakeholders prior to amending any licence issued by a local authority, as this could risk significant disruption for impacted businesses.

## **Conclusion**

21. The Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill represents a proportionate and well-structured approach to improving oversight of visitor accommodation. BH&HPA welcomes the Welsh Government's recognition that licensed caravan and camping sites already operate under an established statutory framework and should not face duplicative regulation.

22. The Association encourages Ministers and the Committee to maintain the Bill's current exclusion for licensed sites and to provide assurance that any future exercise of ministerial powers will be preceded by full stakeholder consultation. This will maintain confidence in the regulatory stability of the Welsh holiday park sector while supporting the shared objective of a well-regulated and sustainable visitor economy.

We welcome the opportunity to work with the Economy, Trade and Rural Affairs Committee to scrutinise the legislation. Please contact us if we can provide additional information. We would be pleased to arrange a visit to a holiday park or facilitate a stakeholder forum with BH&HPA members, if this would be useful to ministers and their advisers.