



Short Term
Accommodation
Association

Short Term Accommodation Association
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Mark Drakeford AS/MS
Ysgrifennydd y Cabinet dros Gyllid a'r Gymraeg
Cabinet Secretary for Finance and Welsh Language
Cardiff Bay
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Cc: Economy, Trade and Rural Affairs Committee
Legislation, Justice and Constitution Committee

23 January 2026

Subject: Development of Tourism and Regulation of Visitor Accommodation Bill

Dear Cabinet Secretary,

I am writing to you as the Chief Executive of the STAA (Short-Term Accommodation Association), the UK-wide trade association for the short-term rental industry. We represent and support the thousands of individuals in Wales (as well as the wider UK) who let out their homes and rooms in this vital part of the tourism sector, and the businesses who support them.

The STAA appreciates the ongoing work put into designing the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill and we are grateful to have been given the opportunity to submit evidence before the Economy, Trade and Rural Affairs (ETRA) Committee. It has been encouraging to see our comments addressed and some of our recommendations taken on board. Still, there are a number of concerns the STAA retains around the content of the Bill and the direction in which the Bill is progressing. We outline these below.

Further Senedd approval: The STAA and the wider sector support the principles of the Bill. We also welcome the fact the Welsh Government has learnt lessons from Scotland and that you have committed to engaging with the sector further so that we can make this licensing scheme one that truly develops (rather than erodes) the Welsh tourism industry. However, we share ETRA and JLC committees' concern with the haste with which this Bill has been introduced and the lack of scrutiny of the wording of the Bill. We find that flaws in the drafting and areas of subjectivity mean that the Bill fails to provide businesses with the certainty and confidence they need.

The STAA thus strongly supports Recommendation 3 from the Stage 1 report by the ETRA committee, i.e. we call on the Welsh Government to amend the Bill at Stage 2 to make commencement of the licensing scheme subject to further Senedd approval. Given the rushed timeline of the Bill, a full Senedd vote prior to scheme coming into force would enhance the democratic legitimacy of the legislation. This would allow for the engagement with the sector you have promised and for the numerous delegated matters, and those subjective matters left to guidance, to be developed properly without delaying the passing of the Bill.

Capacity assessment: We appreciate you confirming that the Welsh Government officials will review the evidence provided by the STAA around expected processing time and cost of licence applications.



Clear evidence from the government of an impact assessment proving that officials have the necessary resources and capacity to process applications at pace would go a long way towards mitigating the uncertainty faced by businesses. We would be pleased to have a dedicated meeting with your officials, to talk through our evidence in more detail and work with them to craft the necessary assurances that licences can be processed in a quick and timely manner, should our concerns around “apply and wait” as set out below not be addressed.

“Apply and wait” approach: The STAA would like to reiterate its concerns around the current “apply and wait” approach. This approach provides great uncertainty to businesses who will be left with uncertainty about whether they will be able to continue operating and accept future bookings while awaiting the outcome of their application. Lessons from the equivalent scheme in Scotland support this – reduced supply of accommodation caused issues during major events and this was due not to the fact that these premises had been deemed unsafe but that many licenses had yet to be approved. These concerns are exacerbated by the current uncertainty around processing times. We support instead an “apply and go” approach, where a VAP is granted an automatic licence number on submission of the application with the required documents, followed by a risk-based approach to document checks and a right to rectify any mistakes before a license is revoked. We understand there is an industry consensus around this; technology allows it to be possible and it is in line with best practice being increasingly adopted in other jurisdictions.

Clarification on license length: The STAA welcomes the proposed amendment to allow for a longer minimum licence period to be specified. However, we believe this should be clarified in stronger terms. Rather than a provision to grant longer licenses, we call for the starting point to already be licenses that last longer than one year. Three years would be in line with international best practice.

Sections 46 and 47: We ask for further clarification of what sections 46 and 47 offences would actually require of booking platforms. While our platform members are keen to cooperate by ensuring ‘compliance by design’, e.g. by making a registration number mandatory on all listings, and ensuring that inputted numbers have to follow a consistent format, they should not be held liable for something out of their control. We believe that platforms having robust ‘notice and takedown’ processes in place to ensure that non-compliant listings are swiftly removed when brought to their attention should be sufficient to act as a reasonable defence, and we believe it is important that this be clarified before the legislation completes its parliamentary process. We would welcome further detail on how platforms, agents and property managers would be able to verify registration numbers.

Again, we would reiterate that accepting the ETRA committee’s Recommendation 3 to make the launch of the scheme subject to further Sennedd approval would allow the Welsh Government and the sector to work collaboratively on this detail before the scheme is operational.

Thank you for taking the time to consider our concerns. I would be very open to discussing any of these matters further with you and your officials prior to the Stage 2 debate.

Kind regards,

Andy Fenner,
STAA Chief Executive