

**P-06-1289 Agree 105 day occupancy, not 182 days, to distinguish holiday let businesses from second homes, Correspondence – Petitioner to Committee, 01.09.22**

Thank you for letting us see the Minister's response.

We have received a similar response from the Minister in the past and consider it to be partial and incomplete.

In particular, the source of the WG evidence of the average occupancy is undisclosed. It is also disputed, as data collected from within the **professional** self catering sector suggest the figure was nearer 34% as of 2019: They calculate that this legislation and the various cost of living crisis will mean a figure of 16% going forward. This is not disclosed in the Minister's reply.

You can find this detail in the body of evidence referred to in the petition, but I have attached it for convenience.

I attach an emailed letter from the Minister which covers some issues not referred to in the reply you have received, and which draw out inadequacies in the approach to making this legislation. I would be very grateful if the Chair and Members would consider its contents before deciding on whether a further debate is appropriate as these have not been discussed in the Chamber. In particular, we draw your attention to the government's own lack of impact assessment and the admission in the EM that their own evidence was contradictory.

We repeat that only 9 of the nearly 1000 responses to the main consultation suggested a 182-day occupancy threshold. We also ask Members to note that the sector was agreed on properties being **available** for well over 6 months in order to qualify as "a business": it is the ability of those *outside the honeypot areas* to hit the **occupancy** threshold which has so disheartened them.

The picture is especially volatile for the reasons which are affecting us all at the moment. The professional sector is also facing pressure from the casually let second home and the growth in speculative purchases fuelled by the covid staycation boom. There is some evidence that some of the latter are now going back on the market as that bubble has burst. **Visit Wales's own data in June showing 32% businesses have experienced cancelled bookings.**

Thank you again for your interest in this issue, the effects of which will be felt in local supply chains every bit as much as self-catering property owners themselves.

Suzy Davies  
Chair Wales Tourism Alliance