

An aerial photograph of Ireland, showing the green landscape and surrounding blue waters. The text is overlaid on the image.

# SHORT TERM TOURIST LETTING REGISTRATION

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**Volunteer Airbnb Host Community  
Leaders Submission to Fáilte Ireland**

**Thursday 9<sup>th</sup> February 2023**

Online Meeting 11am

# Volunteer Airbnb Host Submission

## Opening Remarks

Thank you for your time today. We are a group of Airbnb hosts across Ireland who all offer STTLs in different forms. We are all Volunteer Host Leaders in our communities. We represent our host communities for Airbnb. We are not paid employees in this capacity. We use Airbnb as one of the platforms to offer our accommodations to a wide network of people from across the world.

Our contribution to tourism deserves to be listened to and recognised as a key stakeholder in the implementation of this new legislation.

While we support registration, we believe that the new legislation regarding STTLs will have devastating and far reaching consequences.

The Department of Housing has driven this policy in the belief that an estimated 12,000 properties could become available for Long-term let. According to two surveys of our hosts, *if* conditions were more favourable to landlords, it would be 6,000 at most.

What will happen, however, is that many will drop out of STTL. (Some already have) This is especially true in rural areas, where properties are not suitable for long-term accommodation. 67% of the Irish population is in rural areas.

Most of our group members have properties, or personal circumstances, which led them to choose short term letting as their only option. The frustration, worry and concern from many people is palpable.

On a daily basis we hear the stories of people who rely on their STTLs to pay the bills, send children to college, save a little nest egg for the future, pay for the upkeep of inherited properties. The stories are becoming more harrowing as the cost of living crisis increases. In an attempt to deal with the housing crisis, the Department of Housing, Local Government and Heritage has left the Department of Tourism (DTCAGSM) the responsibility of creating a register, which will result in a huge reduction in the number of tourist beds. This is pertinent at a time when we have reduced hotel capacity across the country.

Fáilte Ireland plans to spend €78 million to attract overseas tourists to Ireland, but where will they stay?

We have been advising our members to take bookings for this summer, and not to close down their listings. For months we have been attempting to give accurate information about Rent Pressure Zones and the 14 day rule and reassure those who are sharing their home that they won't be affected.

Now we find the goalposts have changed again and even we are confused. One thing that is becoming clear is that nothing is clear.

Without giving the Planners some new guidelines to work with, and an expanded policy of exemptions, they are going to be forced to refuse Change of Use and put people out of business.

We also believe that the sector has been reduced to tourism, when in fact we service the accommodation needs of many. From people travelling for work or relocating, to staycations, to those who used STTLs to quarantine during Covid, we have welcomed them all. Our industry supports so many more enterprises, maintaining sustainable communities across Ireland. Has this been taken into consideration when creating this register?

We have many questions regarding the new registration system and the planning permission requirements which go together. We understand that these may not all be answered today. However, we respectfully request that these questions are answered. We are happy to schedule another call, perhaps including a representative from the Department of Housing, Local Government and Heritage who can shed some light on these issues for us. We are eager to get clarification so we can support our fellow hosts across the country and perhaps quell the anxiety that is building for many.

## REGISTRATION SYSTEM QUESTIONS

- 1) What will the cost of registration be?
- 2) Will we be offered a discounted rate for annual renewal as is the case for current Fáilte Ireland members?
- 3) Will there be different registration fees for different types of properties? For example, an Entire Property, one room in house, glamping tent, aparthotel, a yurt, a treehouse.
- 4) Will a person who STTLs two single rooms within one property, using two different advertisements on Airbnb or other OTAs, require an individual registration number for each room?
- 5) Will a person who STTLs a single room on a VERY part-time basis (e.g., for a festival) pay the same as someone who STTLs a room throughout the year?
- 6) Will a self-contained apartment, which is connected to and forms part of a home (one MPRN number/shared services) be considered a separate unit to the home? This particularly applies in the case of renting out a room in the home also. Will each of these require separate registration numbers or do they fall under the same registration as it is one Eircode?
- 7) What do we get for our fee?  
For example, does the fee give us access to marketing of our properties by Fáilte Ireland on their platform? Will we be offered the same support, such as research and resources, as is offered to the hospitality sectors currently under the remit of Fáilte Ireland?
- 8) It seems that the plan is to have a live published register. Will our Eircodes be published in the public domain? If so, this would raise huge security and privacy issues for any STTL provider. What information is going to be available to the general public?
- 9) Will properties that currently have Quality Assurance automatically be added to the register?
- 10) How long does the registration process take?
- 11) Will inspections be carried out? If so, what is the process for this? What are the notice periods? Will guidance documentation and review and appeal processes be issued?
- 12) Will we have to abide by Fáilte Ireland current classification scheme for Guesthouses?
- 13) Assuming planning permission has been granted, will that and a complete registration be sufficient to carry on our business of hosting STTLs?  
If we satisfy Airbnb or any other OTA's requirements will that be sufficient to continue our business?
- 14) Will people who specialise in non-STTL lettings for 9+ months each year get a planning exemption if they take STTLs for less than 60 to 90 days per year? For example, small landlords who rent to students Sept-June and therefore have the summer free; or an apartment that specialises in mid-lets and sometimes has a small gap to fill between longer stays - i.e. their guests typically stay between 14 days to 4 months (e.g. visiting business travellers and semester students are their key focus).
- 15) Can an agent register a property for an owner? If so, will that agent need to be licensed by the PSRA?
- 16) Can a tenant who STTLs a room/granny flat, with the property owner's permission, register a property? If so, they will not have planning permission documentation to hand. How will this work?

## PLANNING PERMISSION QUESTIONS

- 1) Why is there a discrepancy between Planning's definition of a short term let being 14 days or less and the Registration definition being 21 nights or less?
- 2) If a property has been in use as a STTL for 7 years or more, will Planning Permission automatically be granted?
- 3) Will there be different planning regulations for properties in Rent Pressure Zones and those outside of RPZs?
- 4) Does Fáilte Ireland have any influence in the scope of RPZs, which have inadvertently encompassed tourist areas?
- 5) If a home has full planning permission for ground floor and attic conversion rooms, to include septic tank, will these homes require planning permission again? If so, what is the planning permission for?
- 6) Does a granny flat that is advertised as an entire self-catering unit and is part of a home, require change of use Planning Permission?
- 7) If properties are registered as STTLs will they then be considered as commercial properties and be liable for rates?
- 8) Many Entire Properties in towns and cities accommodate students (and/or non STTLs (>21 day bookings) for 9 months a year. They are being used in valuable ways to support students/temporary overseas workers/etc. Will Failte Ireland be encouraging the local authorities to grant planning permission for up to 90 days to allow these STTLs to continue?
- 9) Many properties will need to apply for retention planning permission/change of use planning permission, facing huge expense and more than likely will be refused due to the EU regulations around septic tanks. Ireland's legislation is only catching up with the EU, thereby ruling out most septic tanks pre-2014.  
The current advice we are received from local Planning Enforcement Officers is "don't apply because as things stand we will have to refuse you".  
Can Fáilte Ireland outline for us how the Planning rules will be amended in advance of people registering?
- 10) Are there particular types of properties or locations that Fáilte Ireland would favour to retain as STTLs?
- 11) What happens when a property is registered as an STTL and taken out of the Residential category by the local authority from a planning permission point of view? Does this de-value the home or require change of use back to residential to be sold. This could remove many properties from the market, as banks generally tend not to give mortgages for commercial properties.
- 12) If a property is denied Planning Permission / registration what do Fáilte Ireland expect that property will be used for in the future?
- 13) Will a property be liable for extra LPT or have to pay separate LPT for granny flats, pods, etc.?

## VOLUNTEER AIRBNB HOST COMMUNITY LEADERS

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