



# The Clare, Limerick & Tipperary Host Club

HOST CLUB MEET UP – MONDAY 26<sup>TH</sup> FEBRUARY 2024 – CASTLETROY PARK HOTEL, LIMERICK



# What is the aim of the new legislation?

Department of Housing –

Estimated figure of 10,700 properties “returned” to Long-Term Letting – REVISED DOWN FROM 12,000

Department of Tourism –

Get a clear picture of a previously “unregulated” sector. Know what “stock” is in the market.

Opposition Parties –

Action and “crackdown” on short-term lettings.

European Union –

Regularise STRs with a view to building “sustainable tourism”.



# What are we calling for?

We acknowledge that a registration system for Short-Term Rentals is necessary.

We want STRs vital role within the housing market recognised – it's not just for Tourists.

We are calling for clarity in planning permission guidelines; they must be published with the registration legislation, so people know what they are dealing with.

We feel that **a workable solution can be found that will not impact on genuine Short-Term Rental properties.**

# MYTH BUSTING

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*Debunking common  
misconceptions about  
Short-Term Rentals*

***“16,000 Entire Homes available in Ireland for Short-Term Rentals”***

Commonly seen in newspaper articles and used in debates about STRs

**An “Entire Place” does not equate to an “Entire Home”.**

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***“12,000 properties returned to long-term rentals”***

- 12,000 figure came from a “back of the envelope calculation” from Dept. Of Housing.
- Many properties currently available for short-term rental were never on the long-term housing stock.

**Legislation created based on figures that are not evidence based.**

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***“Airbnb” – viewed negatively***

- “Airbnb” has become the catch-all term for a whole self catering tourism industry that has taken years to develop.
- The self-catering sector is an important sector within Irish tourism.

**Airbnb is just the platform – real people are the providers.**

**What is the new proposed  
legislation for Short-Term Rentals?**

# REGISTRATION OF SHORT- TERM TOURIST LETTING BILL 2022

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## *A Brief History*

Planning and Development Act 2000 (Exempted Development) (No. 2) Regulations 2019

These Regulations, specifically dealing with Short Term Lets came into operation on 1 July 2019. A particular focus on Short Term Lets in Rent Pressure Zones (RPZ).

Guidance Notes for Local Authorities for Regulating Short-Term Letting

Issued by Department of Housing, Planning and Local Government in July 2019

Housing for All Policy – September 2021

*Pathway 4.11*

The Government will bring forward revised regulatory controls requiring the registration of Short-Term and Holiday Lets with Fáilte Ireland.  
(Page 113)

EU Commission – November 2022

EU Commission adopted a proposal for a Regulation to enhance transparency in the field of short-term accommodation rentals and help public authorities ensure their balanced development as part of a sustainable tourism sector.

# REGISTRATION OF SHORT- TERM TOURIST LETTING BILL 2022

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*What it means for hosts?*

All Short-Term Tourist Lets will be required to register.

Register was scheduled to go live March 29<sup>th</sup> 2023. It was delayed due to TRIS standstill at EU Commission.

Published Heads of Bill are expected in March 2024.

Legislation must be approved before registration can begin.

Fáilte Ireland will administer the register.

It will be an annual registration.

The cost is currently unknown.

On the day the Register opens, all STTLs must register as from that day onwards they cannot advertise without a registration number on any platform or privately. Fines will be enforced for platforms in breach.

# What does registration look like?

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Fáilte Ireland said it will take 10 minutes at most to register

Any Agent or individual can register the property / room, but it is the property OWNER'S details which must be given.

- Name, Address and Contact Details of the Property Owner
- Name, Address of the Property
- Type of Property – Define your Property  
Drop-down box with 3 categories based on how you advertise your property.
- Planning Permission Self-declaration box - no proof or documentation required.

*2 Options:*

1. Tick a box saying you are PP compliant  
OR
2. Select that you are using the "clarification period" to bring your property into compliance.

- Pay a fee
- STTL Registration number will be issued immediately.
- STTL Registration number required to advertise on platforms such as Airbnb, etc.

# What does registration look like?

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*Defining Your Property*

## 3 Categories to choose from

A) Principal Primary Residence (rooms being let within your home in which you LIVE).

B) Individual unit - this includes Granny Flats, yurts, pods, houses, apartments etc. If you have these in your garden or attached to your home- they are still classified as individual units, i.e. entire homes

C) Multiple units. This is where you have multiples of the same but separate from your PPR. Examples would be 5 glamping pods; multiple houses in a development; 2 converted barns on your land (that are not attached to your home).

*The categories have been created based on how the STTL is advertised.*

*If it's advertised as an "Entire Place" or as a "Room" then that will dictate the category chosen when registering.*

# What are our concerns?

- 1) Planning Permission requirements as part of registration – lack of clarity
- 2) No recognition of the role of STR within a whole housing market
- 3) Impact on Female Employment Opportunities
- 4) Impact on Tourism
- 5) Privacy and Personal Security Concerns
- 6) Inspections & “Eligibility Criteria” Not Defined
- 7) Penalties and Enforcement Actions Severe
- 8) Lack of Engagement with the STR Sector

# Concern – Planning Permission

- ❖ Planning Permission is being linked to the register – this is a huge stumbling block for most STR hosts.
- ❖ PP is confusing – not clear what PP to apply for, e.g., retention of current use or change of use to commercial depending on your situation.
- ❖ PP is costly and time-consuming. Chances of success are poor.
- ❖ Difficult to get expertise – engineers/planning agents cannot advise because there are no guidance documents issued.
- ❖ Blunt instrument of the RPZs lacks the nuance needed when examining individual properties.
- ❖ A one-size-fits-all approach is being taken with regards to legislation.
- ❖ No differentiation between urban and rural.
- ❖ No pathways for existing genuine STRs to continue in business.
- ❖ Different approaches/attitudes from different Local Authorities – no consistency

# Impact on Housing Market

- ❖ The naming of the Bill as Short-Term Tourist Letting is problematic.
- ❖ Demonstrates the lack of understanding of the sector by policymakers.
- ❖ Short Term Rentals are a vital cog in a healthy housing market.
- ❖ Uses vary from short term contract workers; remote workers; visiting family; experiencing an area before moving to it; accommodation needed while renovation or work in their own home; quarantining during the pandemic, the list goes on.
- ❖ STRs provide flexibility to both the hosts and the guests.
- ❖ STRs offer accommodation options that would never be available for long-term rental.
- ❖ **STRs are not just for tourists.**

# Impact on Female Employment

- ❖ 71% of hosts surveyed are female.
- ❖ Employment roles within the sector and ancillary businesses are predominantly female driven – cleaning; laundrettes; local shops and businesses.
- ❖ STR hosting allows women who are homemakers, raising children and carers to work.
- ❖ Employment is flexible and usually seasonal.
- ❖ Vital to people, particularly women, in areas where other employment opportunities are low or unreliable.

# Impact on Tourism

- ❖ In 2023, the industry generated €12 billion = 2.5% of Ireland's GDP.
- ❖ Supported over 5.1% of the national workforce.
- ❖ Tourism GDP in Ireland is expected to increase by 12% per annum in the next 5 years, outstripping the national GDP growth rate (2%).
- ❖ Budget 2024 allocated €216 million to tourism services; including extending Fáilte Ireland's international marketing campaigns.
- ❖ 15% of tourism beds nationally have been contracted to the Irish government for the 2024 season – with some areas up to 40% regionally.
- ❖ Every 2 self-catering units supports 1 full-time job.
- ❖ For every €1 spent on accommodation, €2.50 is spent on ancillary services such as shops, pubs, attractions, restaurants and cultural experiences.
- ❖ *If short-term rentals are eradicated where will people stay?*

# Rural and Regional

- ❖ Budget 2024 allocated €431 million to Rural Development, Regional Affairs & Islands:
  - to support the economic and social development of rural areas,
  - to contribute to regionally balanced development.
- ❖ Tourism generated approximately 67% of pre-COVID employment in regional and rural Ireland.
- ❖ 13% of all jobs are connected to tourism with 70% of those jobs outside of Dublin.
- ❖ ***The legislation in its current form will devastate a whole industry and decimate many rural and regional communities who depend on tourism.***

# Privacy & Security Concerns

- ❖ The register of all STRs, including personal information & Eircodes, will be available to anyone who requests that information.
- ❖ It is also intended to publish the list of registered premises online quarterly.
- ❖ Many short-term rental providers share their home.
- ❖ Others are properties located in rural areas.
- ❖ These properties could easily become targets for burglaries or other nefarious activities.
- ❖ ***Hosts have a real and serious concern around their privacy and data protection.***

# Inspections & “Eligibility Criteria”

- ❖ Numerous mentions of inspections by the Board (National Tourism Development Authority Act 2003) or Fáilte Ireland throughout the proposed legislation.
- ❖ What would the property be inspected for?
- ❖ No guidelines or parameters have been published.
- ❖ No standards or criteria that we will be expected to meet have been outlined.
- ❖ What are the parameters for “ineligibility” as a short-term rental?
- ❖ **STR hosts expected to engage with and register to a system that is not transparent and clear.**

# Severe Penalties & Enforcement Actions

- ❖ It is proposed to grant Fáilte Ireland investigative and enforcement powers;  
- including the power to enter and search a premises.
- ❖ Many STR providers are women offering rooms in their own homes or granny flats.
- ❖ Proposed powers appear excessive and more likely to drive people out of STRs.
- ❖ The online platforms are subject to €5,000 fine maximum.
- ❖ An individual found to be operating without an *STTL Registration number* is subject to penalties of up to €50,000 or imprisonment of up to 5 years.



[www.saveourstrs.ie](http://www.saveourstrs.ie)

# Survey of Short-Term Letting Hosts in Ireland

SURVEY CONDUCTED  
FEBRUARY 2023

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SURVEY CARRIED OUT BY  
VOLUNTEER AIRBNB HOST  
CLUB COMMUNITY LEADERS

# RESULTS

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## Summary of Key Findings

- ❖ 71% of people operating STRs are female.
- ❖ 89% of people surveyed would not switch their property to long-term letting.
- ❖ 35% of those said the property is too near or part of their home, therefore, making it unsuitable for long-term letting.
- ❖ 32% said the physical layout/amenities available in the property are not suitable for long-term letting
- ❖ 44% said their STR income is essential to support their family.
- ❖ 80% said that their local community depends on STRs to bring business to their area.
- ❖ 40% of those surveyed are PAYE workers who need the added STR income to support their family.



# What are we calling for?

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## What can we do as hosts?



*Scan here to visit the website  
[www.saveourstrs.ie](http://www.saveourstrs.ie)*

All TDs and County Councillors were invited this evening.



Write your host story and send it to your local politicians.

Demonstrate that STRs provide a vital role in the housing market – it's not just for tourists.

Ask local providers who depend on your STR to write to their public representatives and explain how vital they are for the local economy.

Visit the website [www.saveourstrs.ie](http://www.saveourstrs.ie) to get involved with the campaign.

# The Clare, Limerick & Tipperary Host Club

## Volunteer Community Leaders

- ❖ Lorna Cahil
- ❖ Liz Early
- ❖ Contact the Save Our STRs Campaign: [info@saveourstrs.ie](mailto:info@saveourstrs.ie)
- ❖ Join the Clare, Limerick & Tipperary Airbnb Host Club on Facebook  
*Scan the QR code to join the club*  
*Add the link to your listing and accept the club rules.*

