



Solutions to Issues with Registerer for STTL Bill

Separate the Registration from the planning.

Separate the Registration from the planning. Disentangle planning from this Register so that a full inventory of short-term holiday rental properties can be established (as was the original purpose of the register).

Reasons Why Self Catering should be allowed in RPZ areas.

	Reason
1	Purpose built as holiday homes under tax schemes - retain permission to be an STR
2	Grandfather rule – been renting for 7 years or more as tourist accommodation. All members of Failte Ireland and ISCF Register on the list
3	Grants for Business - Allow existing tax compliant, Failte Ireland approved + ISCF STTL Owners in receipt of grants to register
4	Principal Private residence - Your Failte Ireland STTL registration number will be linked to your LPT / RSI & property Folio number - for outbuildings attached to property.
5	Family farm diversification or Family Income STTL -Properties owned or rented by farmers as part of family farm diversification
6	Allow dual Residential / STTL permission - so can have either planning permission. In fact, have on planning permission form - not just Hotels Guesthouses and B&B's, and included into the updated Tourism Traffic Act 1939-2023
7	Heritage Listed buildings / properties not suited full-time occupancy - should be except from modern planning regulations
8	Costings – Costings for the register (unit and group rates), costing for planning & associated requirements and sustainable infrastructure Grants.
9	Properties on the outskirts of a town in RPZ areas - area of RPZ Zones should be urban areas only.
10	Guidance Given to Planners and SME Businesses for National Standards -Tourism hot spots identifies with Planners and given clear National Standard of Guidelines for planning



Benefits of These Proposal

1. All genuine tourist stock remains within the confines of the tourist market.
2. Failte Ireland for the first time have access to the entire tourist accommodation portfolio
3. Dept of Housing will achieve their goals in that original residential properties in large urban areas will return to either the long-term rental market or be sold to owner occupiers. In addition Housing will not have to deal with 30,000 applications in a 6 month time frame (which we all know is unachievable) , they will be restricted to a more manageable figure of targeted properties that is of interest to them.
4. Rural Ireland will be allowed to develop " cottage industries " in their local community using the STTL's as the gateways with community involvement.
- 5 Self-catering will have a registration number, a quality assurance, and all associated requirements of public liability insurance,

Negative's if an Agreement is not Reached.

1. Existing tax compliant businesses listed with Failte Ireland in operation for many years which will have to shut down and lay off staff and impacting the income of families running & working in these STTL's.
2. STL support significant jobs in the wider local economy especially in rural areas
3. Significant loss of bed nights impacting domestic and overseas tourism as 40% of business is incoming tourists. This product appeals to overseas tourists who will travel to other countries if no available accommodation in Ireland.
4. How are already under pressure Planning Staff going to process 30,000 applications in a six-month period when there are already existing backlogs in 6 months window proposed?
5. The ISCF tourist product fulfils this Year-round, low volume, high quality demand that is not economically viable for the larger providers i.e., Hotels, STTL's are the only available tourist accommodation in rural areas which happen to be in an RPZ
6. For family holidays, costs make it prohibitive to stay in standard hotel rooms for a week-long stay plus families prefer to be all under one roof as opposed to being charged a premium for interconnecting rooms. Many hotels are now accommodating refugees so there is a shortage of tourist accommodation in rural areas which will be made worse by this proposal regime.
7. Forcing **all** homeowners to apply for commercial planning permission whether they be location within or outside of existing Rent Pressure Zones is unrealistic. Not all holiday homes owners rent their properties out all year round. Many only rent for a few weeks each year.

Solutions to Issues with Registerer for STTL Bill - Details

	Reason	Justification
1	Purpose Built Holiday Homes - retain Planning- clarified.	Built as STR rental property and stated on Planning Permission. This right needs to go with the building not the owner. Group accommodation section 23
2	Grandad Rule - Existing tax compliant businesses listed with Failte Ireland and ISCF requesting automatic granting. Clarifying length of time in business with support documents. To include confirmation from OTA and marketing companies if applicable.	<p>Allow STL business in operation for 7 years or more to register as STTL outside RPZ. Ensure FI include questions on numbers of years traded, date property built, details of any Planning Enforcement issues, Grants received, Employee Numbers and Tax compliance to allow exemptions to be made for predefined situations. - how many years, tax compliant,</p> <p>The STTL form asks additional questions of Owners if they answer 'No 'to the fact they do not have planning as a STTL i.e.</p> <ul style="list-style-type: none"> * How long have you operated as a Self-Catering Business? * Are there any forth coming Planning Enforcement deadlines in relation to this property? * Have there been any complains to the local planning Authority in relation to this property that you are aware of? * Are you listed with Failte Ireland or ISCF. * Have you received any grants from a Public Body to assist you to market or refurbish this property as a self-catering property?
3	Grants for Business - Allow existing tax compliant, FI approved + ISCF STTL Owners in receipt of grants to register.	Many property Owners including Farmers got grants to set up STL business and websites without need for planning

4	<p>Electoral Area are too big to define an RPZ - Properties in rural locations, but within an electoral area should not be treated as those in middle of a town.</p>	<p>Should be based on an area within 3km – 5km of urban area - some are 100 k in width- as in whole county of Waterford.</p> <p>Property in Bridgetown, Killavullen is 15k from Fermoy, but within the electoral area - should be allowed to continue as STTL. * Property 11 km from Killarney in rural area should be treated differently to town area.</p>
5	<p>Have Self-Catering as a Tourism product on Council Planning Guidelines</p>	<p>1. Example at bottom of Document with KCDP 10-20 encouraging Direct tourism-based development to include Hotels, Guesthouses and BnB's to towns and villages. They also encourage scaled Camping/glamping, camper van and caravan type accommodation located adjacent to existing settlements. Also adjacent to main farmyard complex on suitable sites.</p> <p>2. Planning permission has not been given in Kerry as STR is not given as an option under planning guidelines.</p>
6	<p>Adjacent to an Owners PPR. -Issue with STL located - Granny Flat for farm outbuildings</p>	<p>1. An automatic granting of permission for anybody who is offering tourist accommodation from or attached to the folio of their Principal Private Residence. Allow these STL types to register in all areas -once they are below a certain floor size and have the same LPT as their PPR. Same for Outhouses / as in BnB Inequality over the treatment of a STTL trading versus a B&B which does not require planning if they have less than 5 bedrooms.</p> <p>2. As it is exempt from planning, it will not be deemed a commercial activity. This will ensure that these types of properties can be sold in an unrestricted open market.</p> <p>3. Your Failte Ireland STR registration number will be linked to your LPT / RSI & property Folio number.</p>

		4. An automatic granting of permission to anybody who currently has a tourist accommodation offering outside of an RPZ.
7	Automatic permission granted to anybody who currently has a tourist accommodation offering outside of an RPZ.	This will ensure that STR's in areas with no long-term housing demands continue to trade. The Dept of Housing have no interest in these properties, but Failte Ireland would as they are already providing a tourist product.
8	Farm Diversification- Properties owned or rented by farmers as part of family farm diversification	Properties rented by farmers as part of family farm diversification should be allowed to continue, once have Quality Assurance
9	Guidance Given to Planners for National Standards-	Tourism hot spots identifies with Planners and given clear National Standard of Guidelines for planning and STR to protect and develop the tourism infrastructure.
10	Extension of existing STR business	If an owner has an existing Self-Catering business and proven customer records, they should be allowed to expand the existing business.
11	Combined Planning - STL Planning impacts the property value	Owners of STL will in many cases not apply for planning as it impacts the property value Allow a dual STL/Residential property type - not disincentivized from planning.
12	Many STL's not suitable for long term occupancy. Low BER, too large, heritage property, located in areas with poor infrastructure or do not comply with current Letting Regulations	1. Allow exemptions for properties property is not suited to full-time occupancy, due to structure of the building, lack of heating or other reasons should be allowed to be STR if meets health and safety requirements and can get public liability insurance. 2. An automatic granting of permission to renovate derelict Heritage & properties as STL's
13	Pre 1963 properties did not require planning but has now been forced to apply for it	These should be allowed to register. Those who do register should do so with reference to their planning requirements - when given.

14	10 Week Rule - Many properties only let for less 10 weeks pa so there is no incentive to apply for planning	These should be allowed to register - Exemption - in scenic rural areas. Have to Register but not planning permission.
15	Time for Planning too Short - Owners wishing to apply for planning need more than 6 months to get a planning application in and approved by Local Authority	Allowed to remain on the register if a planning application decision is pending
16	Identify Tourism Hot Spots - areas which need accommodation. Instruct planners to be more flexible in designated tourism hot spots - Dingle, West Cork, North Meath/Cavan, Kilkee, Killarney	<p>no accommodation for domestic & overseas tourism. In many areas STL's are the only available suitable tourist accommodation especially for families.</p> <p>Special project builds in urban areas and in Gaeltacht areas to protect our indigenous culture. Owned and managed by native speakers.</p> <p>Replacement of self-catering units in RPZ Area's with permission for individual owners to gain planning permission, not just the change of use from hotel to part-hotel.</p> <p>Business accommodation should not be the only justification.</p>
17	Festivals Links - Not enough accommodation in areas with international festivals outside Dublin so the viability of these festivals will be severely impacted.	Need to allow STL's in Tourism Hot Spots defined by Failte Ireland. - with festivals presently being funded, and no accommodation. Tourist towns like Killarney and Kinsale which are rent pressure zones should be allowed to provide self-catering accommodation to tourist as they have done so for decades. Self-catering offers an affordable family friendly form of accommodation.
18	Properties with planning as 'Tourism Accommodation'	Should be allowed to register - Cottages- needs to be clearly stated.
19	Grants - Many property Owners including Farmers got grants to set up STL business and websites without need for planning	Allow existing tax compliant, FI approved STL Owners in receipt of grants to register. All those with Grants should have to provide the service agreed for a number of years.

20	Student Accommodation - Presently have to register with RTB and also now the new Register - one Register for Colleges managed by Failte Ireland and allow to summer rentals.	Should be allowed to rent in summer season (3 months) with specific symbol to note and Quality Assurance.
21	Guidelines for the various modern Self-Catering options - All Self-Catering units from glamping to shepherds' huts, yurts and bothies included in register in Rural Ireland.	<p>1.The Guidelines for Planners and Owners of all modern self-catering beds whether in yurts, wooden houses, glamping pods, shepherds huts, bothies and all other such units should be registered.</p> <p>2. Must be issued to all stakeholders at least one week in advance of the legislative vote on the STTL to allow time for responses and meaningful dialogue and amendments.</p>
22	GDPR Data Legislation - GPPR and details of owner's names, Eircodes made	This will ensure that STR's in areas with no long-term housing demands continue to trade. The Dept of Housing have no interest in these properties, but Failte Ireland would as they are already providing a tourist product.

Short-term letting legislation Doc. used in Kerry Co. Council

10.3.5.3 Short-Term Letting

There has been a significant increase in short-term letting and hosting across Ireland in recent years through platforms such as Airbnb and has become an attractive option for many tourists and visitors. However, care needs to be exercised to ensure that the short-term letting of properties does not displace/remove properties from the long-term rental market.

It is the policy of the council to maintain established and newly constructed residential areas as places of permanent residential occupation by owner/occupiers and/or long-term tenants.

The Council will consider on a case-by-case basis the change of use of properties or part of a structure to short term letting where the structure by virtue of its location, condition and/or layout would not ordinarily be suitable as a place of permanent residential occupation. It will be necessary to demonstrate that any such proposed development will not have a negative impact on the long-term rental market or the residential amenity of adjacent properties in the vicinity.

Under the Residential Tenancies (Amendment) Act 2019 and the Planning and Development Act 2000 (Exempted Development) No.2 Regulations 2019 reforms have been introduced to the short-term letting sector. These reforms are aimed at addressing the impact on the private rental market by the use of residential homes for short-term tourism type letting in areas of high housing demand. These provisions only apply to areas designated as 'Rent Pressure Zones' under the Residential Tenancies Act (as amended).

It is an objective of the Council to:

KCDP 10-28 Support best practice environmental management including energy efficiency, e-charging, waste management and recycling in accommodation providers and tourism enterprises in the County.

KCDP 10-29 Direct tourism-based development including Hotels, Guesthouses and B&Bs to towns and villages where there is adequate infrastructure to service the development, except where the proposal involves the re-use or diversification of an existing building, subject to normal planning criteria.

KCDP 10-30 Encourage the sensitive redevelopment and / or return to suitable use, of derelict, vacant or redundant buildings, in appropriate locations in order to provide for visitor accommodation and tourism development. As part of this, potential for impact on wildlife should be taken into account as outlined in S 4.3.4 of this plan.

KCDP 10-31 Support the development of appropriately scaled camping/glamping, campervan and caravan type accommodation located within/or adjacent to existing settlements, established tourism assets or adjacent to a main farmyard complex on suitable sites and at an appropriate scale subject to normal planning considerations.