Observations on the Short-Term Letting and Tourism Bill 2026

November 2026

Threshold

Conradh na Gaeilge

ICOS
Irish Council for International Students

Simon
Communities of Ireland

TINTEÁN

Introduction

Effective regulation of the short-term letting sector will make a meaningful contribution to increasing the supply of residential accommodation in Ireland, particularly in areas experiencing significant housing demand. The Short-Term Letting and Tourism Bill 2026 may achieve this, however, sufficient resourcing of the Fáilte Ireland, robust data sharing agreements and clear legislative provisions for all stakeholders will be key. **Threshold**, the **Irish Council for International Students** (ICOS), **Simon Communities of Ireland**, **Conradh na Gaeilge**, and **TINTÉÁN** set out six recommendations in respect of the Bill, in this document which relate to planning requirements, protecting the Gaeltacht communities and effective data sharing.

Potential impact on housing supply

Research commissioned by the Housing Agency[1], explicitly states that stronger enforcement of existing planning requirements could help address the commercial use of residential properties for short-term letting.

The research[2] identifies 16,870 commercial tourism short-term lets in higher-demand areas that may be suitable for residential use. Its baseline scenarios (minimal regulation) estimate that approximately 3,100–5,500 properties could return to the wider housing market, with a higher-impact scenario (strict regulation) having a potential return of approximately 9,500 properties.

The above figures represent potential returns to either the private rental sector (PRS) or owner-occupier market. The actual outcome will depend on property owners' decisions; the relative financial attractiveness of short- and long-term letting, and the capacity of the relevant authorities to secure compliance.

While regulation of short-term lets (STLs) will not resolve the wider housing shortage or homelessness crisis, it offers an opportunity to bring much-needed, existing residential properties back into use and increase housing availability, particularly in locations where commercial short-term letting represents a significant proportion of the existing rental stock.

To support this goal, we put forward the below recommendations and emphasise the elements that are absolutely necessary to ensure the creation of a robust system to assist "*public authorities in balancing the needs of the tourism sector, local communities and the housing market through the availability of accurate and reliable data*".

---

[1] Indecon International Economic and Strategic Consultants, Indecon Analysis of Evidence on the Impact of Short Term Lets on the Housing Sector (research report prepared for the Housing Agency, March 9, 2026), https://www.housingagency.ie/wp-content/uploads/2026/10/Indecon-Analysis-of-the-Short-Term-Let-Sector-9.3.26.pdf

[2] Ibid

Recommendations

1. **Link compliance with planning requirements and registration with Fáilte Ireland**

Recommendation:

Require STL operators to provide evidence of planning compliance before being issued with a STL registration number. This would have the effect of placing the burden of compliance on the operator and reducing the burden on State to investigate and enforce non-compliance. This would, in our view, establish it as the primary legal mechanism available for making this legislation effective.

Planning compliance for units in towns with populations greater than 20,000

The provision that requires a host to provide confirmation that the unit is planning compliant when making an application to be entered on the register (see page 15, line 9) is welcome. This provision, which is in line with Article 5 of EU Regulation 2024/1028, is absolutely necessary for making this legislation effective and must not be weakened or removed.

While the mode of confirmation is not stated in the Bill, Article 5 of EU Regulation 2024/1028 sets out that the STL operator must "submit a declaration". A declaration is insufficient and removes the burden of compliance from the STL operator, instead placing it on the relevant authorities. Accepting a declaration, in our opinion, will result in a waste of State resources. We recommend that confirmation of compliance take the form of formal documentation from the local authority, for example, a Final Grant of Planning Permission.

Planning compliance for units outside of towns with populations greater than 20,000

A transitional arrangement is proposed for hosts whose units outside of towns with populations of greater than 20,000 in that they will have 24 months to apply for permission (page 68, lines 14 - 16). While we can appreciate that the affording of additional time, or a 'transition period', may be coloured by assumption of there being less housing pressure in these areas. However, housing pressure is being felt in large and small towns throughout the country.

Short-term lets units in Carrigaline, Mallow and Bandon in Co Cork, Maynooth and Leixlip in Co Kildare, Skerries, Rush and Lusk in Co Dublin, New Ross, Gorey, Enniscorthy in Co Wexford, Ashbourne and Trim in Co Meath, and all of County Mayo, for example, fall under this transitional period.

2. **Protect Gaeltacht Communities**

Recommendation:

Change of use planning permission must be in place for STL units in Language Planning Areas, as defined in the Gaeltacht Act, 2012, from the 1st of December this year, in line with the rules for larger settlements

Particular attention must be paid to the Gaeltacht communities which sit outside of these urban centres but are being disproportionally and existentially damaged by the lack of long-term housing options and the transfer of long-term homes into the short-term let sector. Given the specific vulnerability of Gaeltacht areas as regions of particular linguistic sensitivity and of intangible cultural and social value, specific provision must be made. If the Government pursues the 'transition period', then a Gaeltacht provision amendment is necessary. Change of use planning permission must be in place for STL units in Language Planning Areas, as defined in the *Gaeltacht Act, 2012,* from the 1st of December this year, in line with the rules for larger settlements.

This 'transitional period' will allow operators to continue on a 'business as usual' basis while operating in breach of national planning legislation. We believe this is a stark contradiction to the apparent and principle aims of the legislation and should not be facilitated.

3. **Clarity needed on references to an "authorisation scheme".**

Recommendation:

Provide a clear definition of the term "authorisation scheme" for the sake of legal clarity.

There may be some confusion about the term "authorisation scheme" referred to in Section 11 (see page 15, line 9). This is a reference to the provision in Article 5(1) of EU regulation 2024/1028 which requires an STL operator "to obtain authorisation to offer short-term rental accommodation services from the relevant competent authority".

We recognises thar providing a clear and workable definition of the term 'authorisation scheme' is not without challenges when fitting it to individual Member States and their domestic legal systems. However, we feel a workable and coherent definition of this term need to be set out unambiguously in Irish law.

Additional confusion may be caused by other references to an "authorisation scheme", in the Bill. For example, there is reference to it being set out in the Planning and Development Act 2024 and regulations made under it (see page 7, lined 18-20) and elsewhere as being set out in the Tourism and Traffic Act, 1939 (see page 58, line 4).

4. **Elevate the data sharing provisions**

Recommendation:

Make data sharing between Fáilte Ireland and the local authorities a mandatory requirement and include the Revenue and the Residential Tenancies Board in the data sharing agreements. This is to establish best practice on foot of EU Regulation 2024/1028.

It will be necessary for the relevant authorities, such as Fáilte Ireland and the local authorities, to share the data necessary for this legislation in order for the law to be effective as a whole. The provisions set out in Section 37 of the Bill (pages 59-64) allow for these authorities to share information, but, crucially, it does not place an obligation on them to do so.

The provision should be compared with the relevant obligations under EU Regulation 2024/1028 to establish whether this discretionary wording is sufficient. If the Regulation requires information to be made available, or exchanged in particular circumstances, the question is whether Section 8B adequately gives effect to those requirements.

We recommend that there also be an obligation placed on the relevant authorities to share data. These authorities should include the Revenue and the Residential Tenancies Board (RTB).

While online platforms are required to report information on STL operators to Revenue, under EU Directive 2021/514, there is no similar requirement for other outlets where an STL may be advertised. It is in order to close this gap that we recommend that there be an obligation for Fáilte Ireland and the Revenue to exchange relevant information.

As student-specific accommodation providers (SSAs) are registered with the Residential Tenancies Board (RTB), there should be a requirement for data to be shared between Fáilte Ireland the RTB to ensure clear oversight, given there will be register solely for SSAs that provide tourist accommodation outside of the academic term. This will be necessary to ensure student housing does not gradually transition into year-round tourism accommodation.

5. **Timeline for registering**

Recommendation:

Define the term "one month" in Section 7.

There needs to be clarity on exactly how much time will be afforded to short-term let operations to register units once the register is in place. It is set out in the Bill (see page 12, line 20-21) that they must do so "within one month." This term is ambiguous and open to interpretation.

6. Guidance on the correct register

Recommendation:

Provider clear guidance to STL operators as to which unit they must register with.

There will be seven registers. These comprise (i) hotels, (ii) guest houses, (iii) hostels, (iv) holiday cottages, (v) caravan and camping sites, (vi) student specific accommodation offering short-term lets and (vii) short-term lets (see page 11, lines 19-34).