# Report on the impacts of Airbnb in the Republic of Ireland

While data on the impact of Airbnb in Dublin has been available this is the first time that broad data on the impact of the platform in the Republic of Ireland as a whole has been made public.

You can find the data at insideairbnb.com/ireland/

Ireland is in the grips of an acute housing crisis that has escalated over the past 5 years in part due to the governments light touch approach to regulation. During this period the Irish government has failed to introduce adequate regulation of the private rental sector such as rent controls and protections for tenants to guarantee secure and affordable tenure. Investment in construction of social housing has also been slow. In the same period many landlords removed property portfolios from the private rental market and changed the use of those properties to commercial short-term holiday lets. The impacts of short-term lets are part of what is a multi-faceted housing crisis.

It is the business interest of platforms like Airbnb to take commercial advantage of inadequate government regulation. A quick search of the Irish Register of Lobbying reveals that <u>Airbnb has lobbied</u> aggressively to protect its commercial interests in Ireland. They have lobbied government at national and local levels directly over 59 times since they registered in 2015 as well as <u>hiring consultancy firms</u> to lobby on their behalf.

The <u>new regulation</u> for short term lets is currently due to come into effect on July 1st 2019. While we welcome this legislation as an important step in the right direction. There remain many questions as to how this legislation will be effectively enforced.

Data is essential for government, researchers, policy makers and the public to debate the impacts and to make informed decisions and policy. While the authors of this report introduce some preliminary findings we do encourage you to explore the data in further detail. We believe that this data will be of value to persons working in local councils and with government for accessing the impacts of short term lets in their localities.

The purpose of this report is to:

- Highlight the newly available data for the Republic of Ireland insideairbnb.com/ireland/
- Highlight the need for strong, well-enforced legislation restricting short-term lets.
- Provide data for city and county councils and planning offices to support their efforts to pursue and prosecute illegal short term lets.
- Encourage grassroots community groups to use this data for their own areas, so they can highlight how short-term letting is affecting them.

#### Summary and key points

- AirBnb listings are dominated by listings for commercial use, NOT short term rental of otherwise residential homes or rooms that are the primary residence.
- This pattern extends beyond Dublin and beyond the Rent Pressure Zones (RPZs).
- Airbnb has a major impact on housing across the country. The largest impact is in cities and towns that are known as holiday destinations.
- Airbnb is currently unlegislated and unregulated, and the planned 'regulation' is inadequate for dealing with the impact of AirBnb on the rental and housing market.
- The planned Irish regulations do not include the appropriate compliance and
  enforcement tools that have been proven internationally to limit short-term rental
  activity to planned use. These tools must include mandatory permits and platform
  compliance to ensure that every short-term rental is meeting the appropriate planned
  use, and that platforms are not able to advertise un-permitted, or unregulated
  short-term rentals.
- Without effective national regulations that ensure transparency and compliance, the onus will be on Local Councils to investigate anonymous non-compliant listings. It will be impossible to identify addresses or responsible parties from platforms; and councils will have to rely on inefficient research, inspections and complaints.

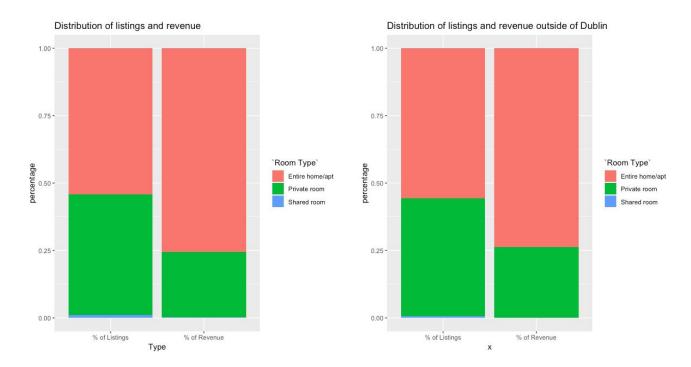
## "Home Sharing" or Commercial Use?

AirBnb markets itself as a 'home sharing' platform - helping you make a little extra money on your spare room. However, a huge amount of the hosts are not someone occasionally renting out their spare room - they are businesses. Airbnb uses the image of sharing as a distraction from it's substantial business interest in the rental market.

The majority of AirBnb's revenue in Ireland comes from listings for entire homes and apartments - not 'spare rooms'.

#### **Entire Homes Dominate**

- Entire home listings dominate the platform and account for 54.0% of all AirBnb listings and 75.5% of revenue. See Fig. 1
- For the rest of the country excluding Dublin, 55.6% of the listings are for entire homes, making up 73.7% of revenue. See Fig. 1



**Figure 1. AirBnb Listings and Revenue in Ireland and outside of Dublin**Entire home listings make up the majority of listings and almost all of AirBnb's revenue in Ireland. The same pattern can be seen in listings in areas outside of Dublin.

#### **Commercial Listings**

A commercial listing is any listing where the host rents more than 1 entire home, or they are renting an entire home for 90 or more days per year, or where the host has more than 2 private rooms.

- 77% of Airbnb Revenue across Ireland comes from commercial listings. In the past 12 months, an estimated €147 million was made from these listings through the platform. See Table 1.
- 33% of listings (9,443 in total) are commercial entire home listings. These hosts made €131 million in the past year, 69% of the total income generated through AirBnb. See Table 1.

	Listings		Estimated Revenue (last 12 months)			
	#	%	€	%		
Commercial	12,662	45%	\$139,298,349	73%		
Entire home/apt	8,574	31%	\$123,590,112	65%		
Private room	4,088	15%	\$15,708,238	8%		
Non-commercial	15,190	55%	\$52,057,232	27%		
Entire home/apt	6,520	23%	\$20,877,718	11%		
Private room	8,367	30%	\$30,692,362	16%		
Shared room	303	1%	\$487,152	0%		
Total	27,852	100%	\$191,355,581	100%		

Table 1. AirBnb commercial and non-commercial listings.

Commercial Entire home/apt listings make up 31% of all listings and 65% of all AirBnb revenue in the country. There is currently almost no enforcement on using residential properties for commercial business including as hotels or B&B.

### **Property Portfolios**

45% of Entire Home rentals are managed by a host who has more than one Airbnb listing. These are clearly not all the host's primary residence but rather they are part of portfolios controlled by property investors & managers. The estimated revenue of these 'hosts' is €60 million, 37% of Airbnb's total revenue in Ireland. 16% of Airbnb's total revenue comes from hosts with five or more listings.

Number of Entire		Estimated Revenue				
Homes/apts	Listir	ngs	(last 12 month	% of Total		
managed by host	#	%	€	%	Revenue	
1	8,398	55%	€73,946,502	51%	39%	
2	2,224	14%	€20,786,112	14%	11%	
3	1,000	6%	€11,290,989	8%	6%	
4	599	4%	€7,760,954	5%	4%	
5+	2,863	21%	€30,659,183	21%	16%	
Total	15,084	100%	€144,443,740	100%	75%	

Table 2. AirBnb hosts with more than one listings

There were 6,686 entire home/apts listed by hosts with more than one entire home/apt listed in Ireland. These listings make up 36% of Airbnb revenue in Ireland.

165 'hosts' had an income of more than €100 thousand each last year. In total they earned €32.7M and controlled 1,298 homes/flats (and 122 private rooms).

It should be noted that some of these hosts with multiple properties are clearly businesses that manage property portfolios on behalf of other landlords. However without a regulation such as a license requirement for businesses to disclose information about listings and ownership we can not know anything about how many landlords use these services to manage multiple properties.

Top 20 hosts operating outside Dublin by revenue

	<u> </u>
Host name	Estimated Revenue
	(last 12 mo.)
Laura	€764,131
Ollie	€426,114
Airmaintain	€348,973
Love Connemara Holiday Cottages	€324,198
The NEST	€251,668
Eugene	€237,104
Eugene	€219,000
Susan @ Cloverleaf Cottages	€213,900
John	€213,246
Jane	€211,200
Rita	€201,600
Lorraine	€198,451
Lauren	€196,746
Connemara Holiday Lettings	€191,598
Michael	€190,003
Douglas	€185,988
Sarah	€178,770
Deniz	€172,412
Ronan	€170,167
Sean	€168,942

**Table 3. Top 20 hosts operating outside Dublin by Revenue** 165 'hosts' had an income of over €100k last year. Most of them do not declare that they are commercial operators.

Residential properties receive planning permission on the grounds that they are developed for residential use. However it is clear that many landlords find it more profitable to take residential properties out of the private rental market and turn them into commercial ventures as 'short-term' holiday and tourist rentals. It is essential that thresholds for commercial use are defined in planning laws in order to be able to appropriately limit full-time commercial use of residential properties.

#### Platform for Licensed/Legitimate Accommodation?

Frequently, those who advocate that there is no need for regulating short-term lets argue that platforms are not impacting long-term residential communities and that the platforms are largely used by licensed hospitality providers, such as hostels, B&Bs and hotels.

When Airbnb hosts self-select the "property type" for their listing, a majority (87%) select a property that appears to be a normal residential property; and not a licensed hospitality establishment like a "Bed and Breakfast", "Hostel", "Boutique Hotel" or "Hotel". 95% of Entire

home or apartment listings are listed as properties that appear to be normal residential properties.

<u>A recent Board Failte</u> report highlighted that licensed accommodation providers are concerned about competition from low cost unlicensed accommodation provided through Airbnb. The data shows that in Ireland platforms such as Airbnb are competing with established (regulated) hospitality providers and using residential properties to do so.

#### Impact (on Housing)

The data and maps on the following pages highlight where short-term lets listings are at their largest scale, both in terms of absolute numbers and in comparison to the number of private dwellings in each Local Electoral Area (LEA) - the LEA is the area unit which local county and city councils are administered. LEA's also outline the areas that the government's Residential Tenancies Board uses to define 'Rent Pressure Zones'. The Irish legislation proposes to regulate short term lets within Rent Pressure Zones.

The data also suggests that short term lets are negatively impacting some rural areas, particularly in tourist destinations in western counties such as Clare and Kerry. There have been reports from workers and employers who have had difficulty finding affordable accommodation as it is more profitable for landlords to rent homes as short term lets to tourists. These areas are not currently listed as Rent Pressure Zones in governments proposed legislation. We encourage use of the data for further research on impacts in these areas.

For reports on the impact of short term lets in rural Ireland see - Saints Scholars and Short-Term Lets: The Reality of AirBnB in Ireland. - https://www.youtube.com/watch?v=k4Hnnx3D4uI

Short-term lets in residential dwellings subtracts from housing available to workers and families living in a community. Researchers around the world have shown that short-stay accommodation in areas under housing pressure not only displaces residents, but also drives up the cost of housing. The impacts of weak regulation and high rents are most keenly felt by the most vulnerable members of communities. People on lower incomes also pay a higher percentage of their earnings on rents. Regulation of short-term lets must form part of more comprehensive rent controls that protect tenants.

To quantify the impact on renters and the cost of rental housing, the number of Commercial Entire home listings has been compared to Rental stock, again in each LEA.

In some LEA's, Airbnb Entire home Listings make up to 7% of Housing Stock and commercial Entire home Listings make up over 50% of Rental Stock.

Also, in some cases, especially in higher density towns or cities, the impact of short-stay platforms can be isolated to particular neighbourhoods, or even apartment buildings, so more detailed statistics might be required to understand the local impact. Simply comparing the number of short-term stay accommodation to the total number of housing units (especially across a broad area, like an entire state) is usually inadequate.

#### Airbnb Listings by Room and Property Type in Ireland

The maps and table below show the extent of AirBnb and listings across the country. The maps show the number of entire home listings on AirBnb, entire homes listings as percent of housing stock, and commercial entire home listings as percent of the private rental stock.

The highest number of listings of entire homes on AirBnb are in the city centre of Dublin, the densest population centre in Ireland. Other areas with a high number of listings are along the Atlantic coast including South and West Kerry (1,045), Connemara (622), West Cork (598) and West Clare (577), Galway city centre also has a high number of listings (316).

In South and West Kerry, 7% of all homes are entire home AirBnb listings; 6.5% are commercial entire home listings. In this area, a majority (52.4%) of all private rental homes are short term rental homes listed on AirBnb.

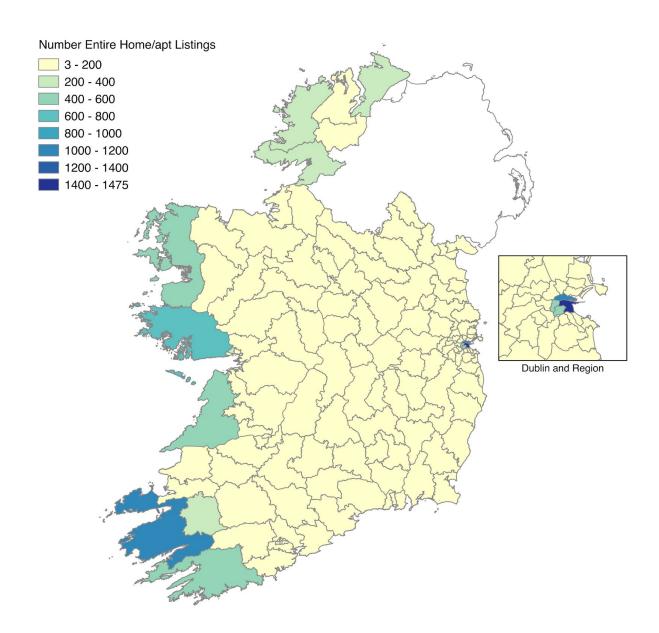
There are also three other Local Electoral Areas (LEAs) where over 4% of all homes are entire home AirBnb listings: Pembroke-South Dock in Dublin, Connemara and West Clare.

In Galway city centre, entire home listings on AirBnb are 3.7% of all homes. In this area, more than one in fifteen (7%) private rental houses are commercial AirBnb accommodation.

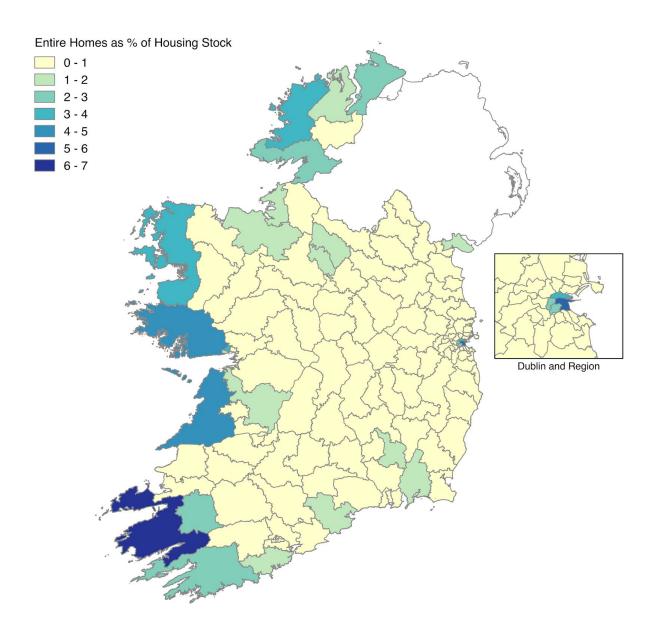
#### Quality of Life Concerns are the Tip of the Iceberg

An important note on the impacts of short-stay accommodation is that issues frequently reported in the media, or in complaints to the local councils - such as undesirable behaviour by guests, lack of parking, increased garbage etc - are all symptoms of residential properties being used for a commercial activity.

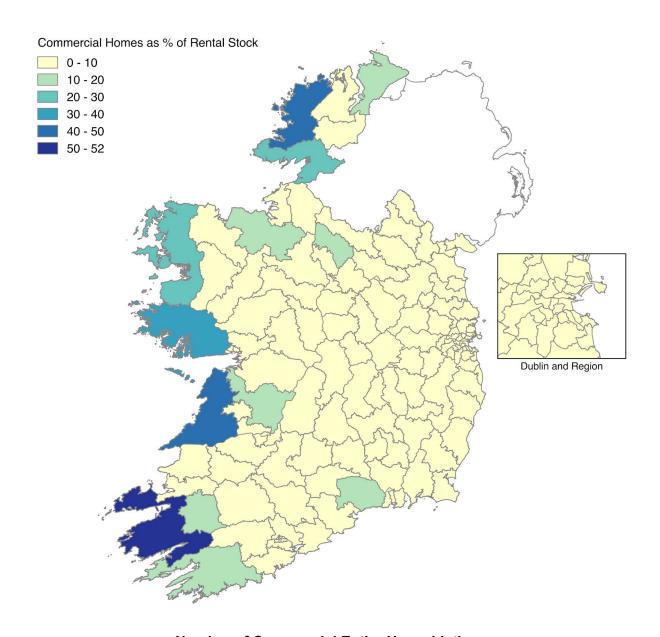
Consumer protection and Codes of conduct do not address the root cause of the issue with short-stay accommodation - the root cause is that widespread short-stay accommodation is incompatible with residential properties and neighbourhoods.



Number of Entire Home Listings by LEA



Number of Entire Home Listings as a Percentage of Housing Stock, by LEA Source: CSO 2016



Number of Commercial Entire Home Listings as a Percentage of Rental Stock, by LEA Source: CSO 2016

A Commercial Entire home is estimated to be rented >= 90 nights per year, or belongs to a host that has more than 1 Entire home listing. These are thresholds used by many policy makers to define commercial use, and behaviour most likely to displace residents.

			Number				
			of	% of	Number of	% of	% of
	Total	Private	Entire	Total	Commercial	Total	Private
LEA	Housing	Rental	Home	Housing	<b>Entire Home</b>	Housing	Rental
	Stock	Stock	Listings	Stock	Listings	Stock	Stock
Pembroke - South Dock	27,264	12,025	1475	5.4%	903	3.3%	7.5%
North Inner City	27,882	13,353	1098	3.9%	693	2.5%	5.2%
South and West Kerry	14,979	1,867	1045	7.0%	979	6.5%	52.4%
Conamara	13,550	1,659	622	4.6%	576	4.3%	34.7%
West Cork	21,312	3,274	598	2.8%	542	2.5%	16.6%
West Clare	12,961	1,306	577	4.5%	523	4.0%	40.0%
Crumlin - Kimmage	22,259	7,249	575	2.6%	323	1.5%	4.5%
Rathgar - Rathmines	20,887	9,293	441	2.1%	234	1.1%	2.5%
West Mayo	11,487	1,520	419	3.6%	374	3.3%	24.6%
Glenties	9,460	732	333	3.5%	312	3.3%	42.6%
Galway City Central	8,611	3,606	316	3.7%	253	2.9%	7.0%
Killarney	13,379	2,358	307	2.3%	276	2.1%	11.7%
Inishowen	14,326	1,533	297	2.1%	278	1.9%	18.1%
Donegal	9,925	1,112	255	2.6%	233	2.3%	21.0%
Sligo	14,689	2,895	191	1.3%	165	1.1%	5.7%
Letterkenny	15,320	2,915	185	1.2%	169	1.1%	5.8%
Galway City West	10,355	3,215	172	1.7%	134	1.3%	4.2%
Bandon - Kinsale	15,577	2,531	165	1.1%	134	0.9%	5.3%
Wexford	17,002	2,819	158	0.9%	141	0.8%	5.0%
Ballymun	22,528	4,298	141	0.6%	96	0.4%	2.2%
Dun Laoghaire	16,395	3,087	138	0.8%	67	0.4%	2.2%
Loughrea	13,826	2,017	136	1.0%	121	0.9%	6.0%
Dungarvan - Lismore	10,656	1,373	135	1.3%	121	1.1%	8.8%
Ballymote - Tobercurry	10,072	1,064	132	1.3%	117	1.2%	11.0%
Tralee	14,926	2,590	122	0.8%	104	0.7%	4.0%
New Ross	11,692	1,442	120	1.0%	112	1.0%	7.8%
Clontarf	21,118	4,347	118	0.6%	49	0.2%	1.1%
Ballyfermot - Drimnagh	20,822	4,132	116	0.6%	50	0.2%	1.2%
Cabra-Finglas	22,463	4,655	114	0.5%	54	0.2%	1.2%
Howth-Malahide	20,867	3,439	111	0.5%	55	0.3%	1.6%
Killaloe	8,237	937	109	1.3%	94	1.1%	10.0%
Kilkenny City East	9,412	1,585	102	1.1%	88	0.9%	5.6%
Dundalk Carlingford	9,258	1,399	96	1.0%	93	1.0%	6.6%

Table 4. AirBnb listings and housing stock. Source: CSO 2016

## **Policy Analysis**

#### **Policy Background**

Internet based short-stay accommodation platforms like Airbnb have existed for more than 10 years. Despite some time since their founding, tens of thousands of regions, cities and towns are still struggling with the impacts of short-stay accommodation, and with the challenges of creating appropriate and effective regulations.

Some of the key barriers to dealing with impacts and a policy response include -

- The ability of internet platforms' supply to scale quickly to a level not seen before, in areas and neighbourhoods that had never seen short-stay accommodation activity or tourism
- Short-stay platforms spending hundreds of millions on advertising and lobbying for de-regulation of their platform
- Platforms' access to politicians and policy makers at a level not available to communities
- Misinformation about the true nature of the short-stay activity
- Obscuring identities and locations of operators so that it is difficult or impossible to enforce regulations
- Platforms that are not accountable to laws
- Law suits, or the threat of lawsuits in response to new legislation

Cities that have had success in regulating the short-stay are opting for regulations that include:

- A permit or license system to ensure that
  - hosts are operating only in properties that meet specific criteria defined by policy makers
  - listings on the Internet can be linked to the regulator's information about the property and operator (some jurisdictions make this information publicly available for transparency)
- Platform accountability to ensure only listings that have a permit are allowed to operate
- Large fines for the platform and hosts for promoting illegal lets.
- Data reporting by the host or platform to further ensure compliance.
- Although not universal, some jurisdictions require inspections.

Examples of limits that allow short-stay activity to minimize impact on residential communities and maintain consistency of zoning, tax credits, leases, and building by-laws include

- Proof of primary residency, or the permission of body corporates or landlords
- Notifications to neighbours
- Bans on entire home listings, or yearly caps to limit full-time use
- Limits on the number of guests that can stay in a property

- Restrictions on buildings that have received residential or affordable housing subsidies
- The presumption of opt-out for apartment building operators or body-corporates

#### Irish Legislation

AirBnb in Ireland is currently unregulated & unlegislated, however <u>legislation</u> governing or restricting AirBnb in Ireland is due to come into effect on 1 July 2019.

According to various reports, it will operate on a 'one host, one home' model - but only in areas of the country where there is "deemed to be a high housing demand".

An annual cap of 90 days will apply for the renting out of an entire home, and homeowners can only rent out their homes for 14 consecutive days or less at a time. The new regulations will also require people renting out their homes to register with their local authority (city council or county council).

The regulations will also require anyone who is renting out a property that is not their principal private residence to seek a special planning permission for this type of use - this will be sought from the local authority.

### **Policy Recommendations**

In the currently proposed new AirBnb legislation the task of regulating AirBnb & short term lettings will fall to the local government body - the county council or city council.

However, government has not provided sufficient information outlining how councils will effectively regulate short term lets. Assuming that the responsibility for enforcement will fall to planning offices, what extra powers will they be given?

The authors of the report believe that councils should be supported at the national level.

Will there be a national hotline for neighbours to report suspected illegal lets or to report where anti-social behavior of tourists is negatively impacting the security and quality of life of communities? What legal process will be in place to effectively investigate and act on such complaints? Will there be fines for Airbnb and hosts that list illegal lets?

One of the primary goals of this report is to highlight the data now published and to encourage people working in councils as well as researchers and policy makers to make use of it. This data is not provided by Airbnb directly and when we ask the question why the authors of this report conclude that Airbnb does not publish this data because it profits from obscurity. Furthermore we wish to highlight that publishing of data has its limits.

Some hosts are businesses that manage multiple properties as a service on behalf of absentee landlords. This makes it difficult for councils to identify landlords. How exactly will councils monitor hosts with multiple listings and will they be required to provide proof of ownership or lease agreement details for all residencies?

It has been reported that some hosts or landlords mix short term lets with student accommodation.

This lack of information about how the new legislation will be enforced does not encourage public confidence. Even AirBnb itself <a href="https://example.com/has-said">has said</a> it believes the legislation will be unenforceable.

## Lobbying

### **About this Report**

This report was authored by activists from the Irish Housing Network (IHN), including Kevin Flanagan, Michelle Connolly and Sasha Brown. The IHN is a collection of grassroots and community groups from across the island of Ireland fighting the ongoing housing and homeless crisis. We believe in the basic premise that housing is a right that should be provided based on need. We aim to share information, resources and coordinate action with groups across the island.

The data in this report was collected by Inside Airbnb, an activist project, which collects data directly from the Airbnb web-site.

Signed

Galway Housing Support Group Limerick Housing Action Cork Tenant Co-Operative Dublin South West Housing Action Dublin Central Housing Action