

Section 5 Declaration
Referral to An Bord Pleanála

Mayo County Council

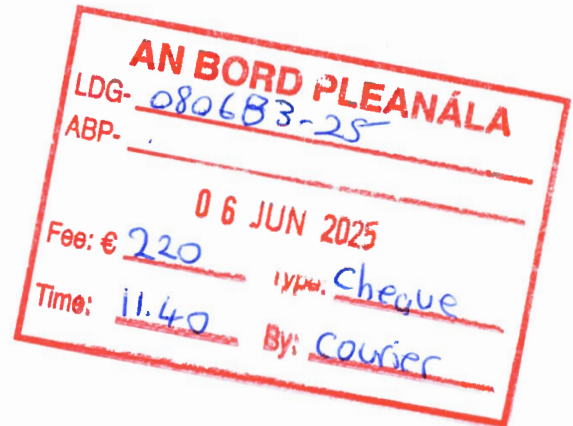
Reg Ref: P25/7

Proposed Change of Use at:

**Unit 8 (First Floor),
N5 Business Park,
Moneen, Castlebar,
Mayo**

On behalf of:

SagJoin Partnership



**Brock
McClure**
PLANNING & DEVELOPMENT CONSULTANTS

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Introduction

We, Brock McClure, Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin, have been instructed by our client, Sagjoin Partnership, Apt 206 Keystone, Capital Dock, Grand Canal, Dublin 2, to lodge this referral of a Section 5 Declaration made by Mayo County Council relating to the question of whether a proposed change of use from Retail/ Commercial (Shop) to Temporary International Protection Accommodation is or is not exempted development at Unit 8 (First Floor), N5 Business Park, Moneen, Castlebar, Mayo (MCC Reg Ref. P25/7).

Mayo County Council issued a Declaration under Section 5 of the Planning and Development Act (2000) (as amended) on the 12th of May 2025, deeming that the subject change of use is 'Not Exempted' from requiring planning permission. In this regard, this Section 5 Declaration Referral is made to An Bord Pleanála as the applicant and project team are of the opinion that the subject change of use should be determined to be 'Exempted' from requiring planning permission.

As the Declaration under Section 5 of the Planning and Development Act (2000) as amended in relation to the above noted question (MCC Reg Ref. P25/7) was issued by Mayo County Council on the 12th of May 2025, we note that the relevant referral deadline is the 9th of June 2025. We confirm that this Section 5 Declaration referral is lodged to An Bord Pleanála before this deadline.

The statutory appeal fee of €220 is enclosed herewith – as per fee type R1 described as – *You want to refer a declaration made by a planning authority on a question that was put to the planning authority.*

We ask the Inspector and the Board to have regard for the content of this Report, and the originally submitted Section 5 Declaration content, and determine if the subject change of use is 'Exempted' or 'Not Exempted' from requiring planning permission de novo.

2 Formal Details

We can confirm the following formal details for this appeal:

Referral:	First Party Referral of a Section 5 Declaration
Fee:	€220 (ABP category 'R1' for the purpose of fees)
Planning Authority:	Mayo County Council
Reg. Ref:	P25/7
Appeal Deadline	9 th June 2025
Applicant & Appellant Name:	Sagjoin Partnership
Applicant & Appellant Address:	Apt 206 Keystone, Capital Dock, Grand Canal, Dublin 2
Agent Name:	Brock McClure Planning & Development Consultants
Agent Address:	63 York Road, Dún Laoghaire, Co. Dublin, A96 ToH4
Proposal Address:	Unit 8 (First Floor), N5 Business Park, Moneen, Castlebar, Mayo
Section 5 Declaration Request Question:	"Whether the proposed change of use from retail and commercial use to Temporary International Protection Accommodation is or is not exempted development"

Site Context

The following Section of this Section 5 Referral Report has been prepared to summarise the Site Context for the benefit of An Bord Pleanála. A detailed analysis of the Site Context was included within the Section 5 Declaration Report originally lodged to Mayo County Council. We refer An Bord Pleanála to the originally lodged report for details:

Subject Site:	<p>The subject site is located at Unit 8 (first floor) within the N5 Business Park, located approximately 1.2km to the northeast of Castlebar, Mayo.</p> <p>The site is located to the rear of N5 Business Park. The site is bound to the northeast by Roadstone Quarry, to the northwest by greenfield open space and to the southeast and southwest by commercial units of similar style to Unit 8 within the N5 Business Park. Site access for pedestrians and vehicles is via an access road and associated pedestrian footpath through the N5 Business Park. Moneen Road (R373) runs to the south of the site and connects to the N50 and N6. Pedestrian links are in place and service the existing development.</p>
Subject Site Planning History:	<p>MCC Reg. Ref. 981335 – Permission for development to construct retail/commercial park. – Permission GRANTED on the 21st August 2000.</p> <p>MCC Reg. Ref. 9813350 – Extension of duration permission for Reg. Ref No. 981335. Planning permission GRANTED on 25th February 2005.</p> <p>MCC Reg. Ref. 07720 – Permission for development to consist of amendments to the elevations of a two-storey unit (unit 8) previously granted permission under applications with planning reference numbers p98/1335 and p98/13350. Planning permission GRANTED on the 22nd June 2007. The Floorplan drawings for Unit 8 lodged with this application clearly show that the building contains 4 no. retail units consisting of a ground and first floor retail space.</p> <p>It is noted to An Bord Pleanála that the building has been in use as 4 no. retail units and associated space at 1st floor level for retail goods storage etc. since the construction of the building.</p> <p>MCC Reg. Ref. 24551 – Section 5 Declaration: If the property qualifies for exemption based on its accommodation of individuals under international protection (IP) as per Planning & Development(exempted development) (No.4) Regulations 2022. Notification of intention to avail of Class 20F Exemption. – Permission REFUSED on the 18th November 2024.</p> <p>We wish to note to An Bord Pleanála that the previous refusal reasons associated with the Section 5 Declaration Request MCC Reg Ref. 24551 have now been addressed as part of this revised Section 5 Declaration Request. As part of the previously lodged request, incorrect information was provided to the council regarding the use of the building on site. It was incorrectly stated in the previous S5 Declaration Request pack that the use of the building was ‘office’, which resulted in the council issuing refusal reason no. 1, noting that the building had never previously been in use as an office.</p>

	<p>The above Planning History relevant to the subject site demonstrates that the subject building was originally granted permission for use as a Retail/ Commercial park. The subject building has been in use as a Retail/ Commercial unit since its construction. Whilst there are permissions associated with other units within the Retail/ Commercial Park to convert their use to office space, there are no such permissions associated with the subject building, Unit 8, and the first floor of the unit has remained in use as a space associated with the Retail/ Commercial use of the building. The building has been occupied and in use as a Retail/ Commercial space since its construction.</p> <p>All units in Retail/ Commercial use in the building trade from ground floor level and have access to the first floor of the building as part of their operation for storage of stock etc through shared lift/ stair cores. It is submitted that the use of the first floor of the building is intrinsically linked to, and is part of, the Retail/ Commercial (Shop) functioning of the building.</p>
<p>Planning Context:</p>	<p>The Castlebar Town & Environs Local Area Plan 2023-2029 represents the statutory planning document governing the development of the subject site.</p> <p>Zoning for the site is included in Map 1 – Land Use Zoning, published as part of the Castlebar Town & Environs Local Area Plan 2023-2029.</p> <p>The site is zoned ‘Enterprise and Employment’, within the Castlebar Town & Environs Local Area Plan 2023-2029 with an objective:</p> <p style="text-align: center;"><i>‘To provide land for industrial, enterprise and employment uses’.</i></p> <p>The current use of the buildings on the site is Retail/ Commercial (shop) which is considered a use that contributes to the ‘Enterprise and Employment’ zoning objective on the site. This Section 5 Declaration request to Mayo Council seeks to determine that change of use from Retail/ Commercial (shop) to Temporary International Protection Accommodation is exempted development.</p>

Mayo County Council Section 5 Declaration

Mayo County Council issued a Declaration under Section 5 of the Planning and Development Act (2000) (as amended) on the 12th of May 2025, deeming that the subject change of use is ‘Not Exempted’ from requiring planning permission. Mayo County Council listed the following reasons for deeming the proposal ‘Not Exempted’ from requiring planning permission:

- i. *As there does not appear to ever have been a retail/commercial (shop) use on the first floor of Unit 8, N5 Business Park, Moneen, Castlebar, Co. Mayo, Class 20F Planning and Development (Exempted Development) (No. 4) Regulations 2022 does not apply in this instance.*
- ii. *Development to which Article 6 relates shall not be exempted development for the purposes of the Act— if the carrying out of such development would endanger public safety by reason of traffic hazard or obstruction of road users.*

It is noted to An Bord Pleanála that the only report the Mayo County Council have published with this Declaration is a brief Planner’s Assessment outlining the above reasons for deeming the proposal ‘Not Exempted’ from requiring Planning Permission. There is no further insight into the decision, nor does the Planning Authority iterate why they do not accept the sworn statement and evidence provided by our client.

It is also noted to An Bord Pleanála that of the 12 no. Section 5 Declaration requests in relation to change of use to provide Temporary Accommodation for International Protection Applicants that have been made to Mayo County Council in the last 2 years, including the subject S5 Declaration, only 4 no. of these have been deemed ‘Exempted’ from requiring planning permission.

No documents are published with any Mayo County Council Section 5 Declarations, however it is considered by the appellant that this represents a very low ‘Exemption’ rate, given that from a high level review, some of the existing uses where Mayo County Council have deemed a proposal ‘Not Exempted’ from requiring planning permission appear to fall under the definition of uses within Schedule 2, Part 1; Class 20F of the Planning and Development Regulations 2001 (as amended) that should allow an exemption from requiring permission for change of use to provide Temporary Accommodation for International Protection Applicants.

A list of all Section 5 Declarations issued by Mayo County Council in relation to changes of use to provide Temporary Accommodation for International Protection Applicants is below for the attention of An Bord Pleanála:

MCC Ref No.	S5 Declaration Question	S5 Declaration
24111	Change of Use from Restaurant and Vacant Office Rooms to IPAS Accommodation	Not Exempt
24109	Change of Use from Residential to IPAS Accommodation	Not Exempt
24147	Change of Use from Residential to IPAS Accommodation	Not Exempt
24391	Change of Use from former Pub and Accommodation to IPAS Accommodation	Not Exempt

24373	Change of Use from Guesthouse/ B&B to IPAS Accommodation	Not Exempt
24431	Change of Use from Wedding/ Events Venue to IPAS Accommodation	Not Exempt
24451	Change of Use from Office to IPAS Accommodation	Not Exempt
24459	Change of Use from former School to IPAS Accommodation	Exempt
24515	Change of Use from Hotel to IPAS Accommodation	Exempt
24469	Change of Use from Hotel to IPAS Accommodation	Exempt
257	Change of Use from Commercial (Shop) to IPAS Accommodation	Not Exempt
2511	Change of Use from former Pub and Accommodation to IPAS Accommodation	Exempt

It is also expressly noted to An Bord Pleanala that the subject site for use as Temporary International Accommodation has the support of the Department of Children, Equality, Disability, Integration and Youth, who provided a letter detailing that:

I can confirm that the Department is interested utilising the above property for the accommodation of International Protection applicants subject to all planning, change of use, building control, Certificate of Compliance on Completion (CCC), fire and insurance certifications being in place and subject to contract/contract denied.

A copy of this letter is provided to An Bord Pleanala as part of this Section 5 Referral pack.

On this basis, our client was extremely disappointed to receive the recent decision and are left with no choice but to appeal this to An Bord Pleanala.

Grounds for Referral

Having reviewed the S5 Declaration issued by Mayo County Council, it is our professional opinion that the 2 no. reasons listed as the basis for deeming the proposed change of use from Retail/ Commercial (Shop) to Temporary International Protection Accommodation at Unit 8 (First Floor), N5 Business Park, Moneen, Castlebar, Mayo (MCC Reg Ref. P25/7) as ‘Not Exempted’ from requiring planning permission have been incorrectly applied.

In this regard, this referral is specifically requesting that An Bord Pleanála examines the Section 5 Declaration question de novo and deems this proposal to be ‘Exempted’ from requiring Planning Permission, overturning the Mayo County Council Section 5 Declaration originally issued, which deemed the proposal to be ‘Not Exempted’ from requiring planning permission.

The applicant’s response to each of the reasons attached to Mayo County Council’s letter declaring the proposal as ‘Not Exempted’ from requiring planning permission is now included below for the benefit of An Bord Pleanála.

5.1 Applicants Response to Item (i) included in Mayo County Council S5 Declaration

Mayo County Council included the following as Item (i) within the Section 5 Declaration Letter issued on the 12th of May 2025, deeming the subject proposal ‘Not Exempted’ from requiring planning permission:

As there does not appear to ever have been a retail/commercial (shop) use on the first floor of Unit 8, N5 Business Park, Moneen, Castlebar, Co. Mayo, Class 20F Planning and Development (Exempted Development) (No. 4) Regulations 2022 does not apply in this instance.

In response to this, it is submitted to An Bord Pleanála that the applicant clearly provided proof of the use of the first floor of Unit 8, N5 Business Park, Moneen, Castlebar, Co. Mayo to Mayo County Council as part of the Section 5 Declaration process.

It was initially submitted by the applicant to Mayo County Council that the subject building has been in use as a Retail/ Commercial unit since its construction. All units in Retail/ Commercial use in the building trade from ground floor level and have access to the first floor of the building as part of their operation for storage of stock etc through shared lift/ stair cores. The use of the first floor of the building is intrinsically linked to, and is part of, the Retail/ Commercial (Shop) functioning of the building.

Mayo County Council proceeded to request Further Information in respect of the Section 5 Declaration Question, asking the applicant to:

‘Furnish Mayo County Council with details in the form of commercial lease agreements and/ or any other type of evidence such as pictorial evidence or copies of advertisements or links to websites, confirming the nature and duration of the commercial activity previously undertaken in the said premises’.

As part of the Further Information Response submitted to Mayo County Council prior to the issue of the Section 5 Declaration deeming the proposal 'Not Exempted' from requiring planning permission, the following documents were submitted to Mayo County Council confirming the nature and duration of the commercial activity undertaken at the subject site:

- **Affidavit Provided by Previous Tenant of Retail Unit 3 and associated First Floor Retail Storage Space.** - An Affidavit has been provided by the Tenant of Retail Unit 3 from January 2018 to November 2019 confirming that the unit, and the entirety of the first-floor space of Unit 8 N5 Business Park, was in use for retail furniture sales and associated retail storage space until November 2019.
- **Moran Auctioneers Letter** - Confirmation from Moran Auctioneers that Retail Unit 3 and the entirety of the first-floor space of Unit 8 had been leased as a retail unit and associated retail storage space prior to their instruction to sell retail units within Unit 8 N5 Business Park in December 2019. This letter contained confirmation that following their appointment, the retail units were marketed and sold to suit individual purchaser requirements, and that the first-floor space above units 1-4, which had previously served as retail storage space for Unit 3, was sold separately. Due to ongoing title issues within the park and the broader instability of the retail market during the Covid – 19 pandemic, the sale of the units was not completed until 2023.

We refer An Bord Pleanála to the Affidavit and Auctioneer's Letter submitted with the Section 5 Declaration Request Pack in response to Mayo County Council's request for Further Information for details.

It is submitted to An Bord Pleanála that the applicant provided sufficient information to Mayo County Council to demonstrate that the change of use on the site should be considered 'Exempted' from requiring planning permission in accordance with Schedule 2, Part 1, Class 20F of the Planning and Development Regulations 2001 (as amended), which lists the following as exempted development:

'Temporary use by or on behalf of the Minister for Children, Equality, Disability, Integration and Youth to accommodate or support displaced persons or persons seeking international protection of any structure or part of a structure used as a school, college, university, training centre, social centre, community centre, non-residential club, art gallery, museum, library, reading room, sports club or stadium, gymnasium, hotel, convention centre, conference centre, shop, office, Defence Forces barracks, light industrial building, airport operational building, wholesale warehouse or repository, local authority administrative office, play centre, medical and other health and social care accommodation, event and exhibition space or any structure or part of structure normally used for public worship or religious instruction'.

It is also noted to An Bord Pleanála that the proposal does not breach the conditions and limitations associated with exempted development Class 20F, detailed as follows:

	Exempted Development Class 20F – Conditions and Limitations	Applicant Response
1	The temporary use shall only be for the purposes of accommodating displaced persons or for the purposes of accommodating persons seeking international protection.	Noted - The proposal is for change of use from retail commercial floorspace to Temporary International Protection Accommodation.
2	Subject to paragraph 4 of this class, the use for the purposes of accommodating displaced persons shall be discontinued when the temporary protection introduced by the Council Implementing Decision (EU) 2022/382 of 4 March 2022 ¹ comes to an end in accordance with Article 6 of the Council Directive 2001/55/EC of 20 July 2001.	Noted
3	The use for the purposes of accommodating persons seeking international protection shall be discontinued not later than 31 December 2028.	Noted
4	Where the obligation to provide temporary protection is discontinued in accordance with paragraph 2 of this class, on a date that is earlier than 31 December 2028, the temporary use of any structure which has been used for the accommodation of displaced persons shall continue for the purposes of accommodating persons seeking international protection in accordance with paragraph 3 of this class.	Noted
5	The relevant local authority must be notified of locations where change of use is taking place prior the commencement of development.	Noted
6	'displaced persons', for the purpose of this class, means persons to whom temporary protection applies in accordance with Article 2 of Council Implementing Decision (EU) 2022/382 of 4 March 2022.	Noted
7	'international protection', for the purpose of this class, has the meaning given to it in section 2 (1) of the International Protection Act 2015 (No. 66 of 2015). 8. 'temporary protection', for the purpose of this class, has the meaning given to it in Article 2 of Council Directive 2001/55/EC of 20 July 2001."	Noted

Table 1 – Exempted Development Class 20F Conditions and Limitations.

We ask An Bord Pleanála to examine the proposal in the context of Schedule 2, Part 1, Class 20F of the Planning and Development Regulations 2001 (as amended) and the associated Conditions and Limitations and deem that the proposal is compliant with the requirements to be determined as a proposal 'Exempted' from requiring planning permission on this basis.

Article 6 (1) of the Planning and Development Regulations 2001 (as amended) states:

Subject to article 9, development of a class specified in column 1 of Part 1 of Schedule 2 shall be exempted development for the purposes of the Act, provided that such development complies with the conditions and limitations specified in column 2 of the said Part 1 opposite the mention of that class in the said column 1.

Referring to Article 9(1), the only restrictions considered potentially relevant to the proposal are set out below:

- a) *If the carrying out of such development would –*
 - i. *Contravene a condition attached to a planning permission under the Act or be inconsistent with any use specified in a permission under the Act.*
 - ii. *Endanger public safety by reason of traffic hazard or obstruction of road users,*
 - iii. *Consist of or compromise the extension, alteration, repair or renewal of an unauthorised structure or a structure the use of which is an unauthorised use.*
 - viiB. *Comprise development in relation to which a planning authority or An Bord Pleanála is the competent authority in relation to appropriate assessment and the development would require an appropriate assessment because it is likely to have a significant effect on the integrity of a European Site.*

We also ask An Bord Pleanála to examine the subject proposal in the context of Article 9 (1) of the Planning and Development Regulations 2001 (as amended), and deem that the proposal is compliant with the requirements to be determined as a proposal ‘Exempted’ from requiring planning permission on the following basis:

- ☐ The proposal does not contravene a condition attached to any previous planning applications pertaining to the subject site.
- ☐ The proposed change of use from retail and commercial floorspace, to Temporary International Protection Accommodation will comply with all requirements of the Department of Children, Equality, Disability, Integration and Youth, and the proposals will be agreed with the Department prior to implementation. It is therefore considered that no impact to traffic safety or public safety is likely to occur as a result. We note that this was identified by Mayo County Council as reason (ii) why the subject proposal was not considered by them to represent development that is ‘Exempted’ from requiring planning permission. A response to this item is provided in Section 5.2 below.

- The proposed change of use from Retail/ Commercial (shop) to Temporary International Protection Accommodation will not consist of or compromise the extension, alteration, repair or renewal of an unauthorised structure, or a structure the use of which is an unauthorised use.
- It is not considered that the proposed development will have a significant impact on the integrity of any European sites. The proposal for change of use from Retail/ Commercial (shop) to Temporary International Protection Accommodation will utilise existing foul and surface water drainage connections associated with the existing Retail/ Commercial (shop) use.

5.2 Applicants Response to Item (ii) included in Mayo County Council S5 Declaration

Mayo County Council included the following as Item (ii) within the Section 5 Declaration Letter issued on the 12th of May 2025, deeming the subject proposal ‘Not Exempted’ from requiring planning permission:

Development to which Article 6 relates shall not be exempted development for the purposes of the Act— if the carrying out of such development would endanger public safety by reason of traffic hazard or obstruction of road users.

In response to this, it is submitted to An Bord Pleanála that Mayo County Council have no basis on which to make this claim. We have requested interdepartmental reports from Mayo County Council associated with this Section 5 Declaration Issue and note to An Bord Pleanála that no Traffic/ Transport Assessment of the proposal was undertaken by the Mayo County Council Transport Department.

As part of the Further Information Request issued by Mayo County Council during the Section 5 Declaration process, an advice note was included that noted:

‘Mayo County Council remain to be convinced that the development would not endanger public safety by reason of traffic hazard or obstruction of road users and your conclusion reached in response to same i.e. there will be no adverse traffic impacts arising from the proposed change of use, either to the residents of the Temporary international protection facility or other road users. As the residents who have access to private modes of transport is considered to be less than the number of persons that would use private modes of transport to access and egress the site if the use of the 1st floor was converted to office space, a use that has been granted for a number of other units within the retail/ commercial park’

In response to this advice note, a Transport Technical Note was prepared by Transport Insights as part of this Section 5 Declaration Request Further Information Response Pack. This prepared note concluded that the proposed development is not predicted to materially impact on the operation of the adjoining road network in terms of traffic congestion or traffic statement. Transport Insights therefore deemed that the following statement as included within the initially lodged Section 5 Declaration Report is accurate:

“There will be no adverse traffic impacts arising from the proposed change of use, either to residents of the Temporary international protection facility or other road users. As the residents who will have access to private modes of transport is considered to be less than the number of persons that would use private modes of transport to access and egress the site if the use of the 1st floor was converted to office space”

Transport Insights have prepared a note as part of this Section 5 Referral to An Bord Pleanála supporting their original conclusions.

We refer An Bord Pleanála to the Transport Technical Note lodged as part of the Section 5 Declaration Further Information Response Pack and the Supporting Letter prepared by Transport Insights as part of this Section 5 Referral to An Bord Pleanála for details.

We trust that this is sufficient for An Bord Pleanála to determine that there is no potential for adverse traffic impacts arising from the subject proposal.

6

Conclusion

We consider that the Section 5 Declaration material provided by the applicant throughout the Section 5 Declaration process clearly demonstrates that the proposed change of use on the site is exempted development and complies with the exemption requirements outlined in Schedule 2, Part 1, Class 20F and Article 9(1) of the Planning and Development Regulations 2001 (as amended).

We ask An Bord Pleanála to examine the Section 5 Declaration Request question of whether a proposed change of use from Retail/ Commercial (Shop) to Temporary International Protection Accommodation is or is not exempted development at Unit 8 (First Floor), N5 Business Park, Moneen, Castlebar, Mayo (MCC Reg Ref. P25/7) de novo, and determine if the subject change of use is 'Exempted' or 'Not Exempted' from requiring planning permission.



Comhairle Contae Mhaigh Eo
Mayo County Council



A: Áras an Chontae, Caisleán an Bharraigh,
Contae Mhaigh Eo, F23 WF90

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Ar dTag./ Our Ref.

Do Thag./ Your Ref.

PER REGISTERED POST

Brock McClure Planning
& Development Consultants,
63 York Road,
Dun Laoghaire,
Co. Dublin



P25/7

12 May, 2025

Re: P25/7 - Declaration under Section 5 for change of use from retail/commercial (shop) to Temporary International Protection at Unit 8, (First Floor), N5 Business Park, Moneen, Castlebar, Co. Mayo - SagJoin Partnership

Dear Sir,

I refer to your request of a Declaration under Section 5 of the Planning & Development Act, 2000.

Mayo County Council wishes to point out having regard particularly to:

- (i) Class 20F Planning and Development (Exempted Development) (No. 4) Regulations 2022.
- (ii) Article 9 (1) (a) (i) and (iii) (Restrictions on Exemption) Planning and Development Regulations 2001 (as amended).

AND WHEREAS Mayo County Council has concluded that –

- (i) As there does not appear to ever have been a retail/commercial (shop) use on the first floor of Unit 8, N5 Business Park, Moneen, Castlebar, Co. Mayo, Class 20F Planning and Development (Exempted Development) (No. 4) Regulations 2022 does not apply in this instance.
- (ii) Development to which Article 6 relates shall not be exempted development for the purposes of the Act— if the carrying out of such development would endanger public safety by reason of traffic hazard or obstruction of road users.

- **NOW THEREFORE** Mayo County Council, in exercise of the powers conferred on it by Section 5 of the Planning and Development Act 2000 (as amended), hereby decides *if the property* (Unit 8, First Floor, N5 Business Park, Moneen, Castlebar, Co. Mayo) *qualifies for exemption based on its accommodation of individuals under International Protection (IP) as per Planning & Development (Exempted Development) (No.4) Regulations 2022. Notification of intention to avail of Class 20F Exemption is* development and is **not** exempted development.

Yours sincerely,

Fiona Fay

MARY GORDON, A.O.
PLANNING SECTION

Copy to: SagJoin Partnership, C/O Martin Walsh, Apt. 206 Keystone, Capital Dock, Grand Canal, Dublin 2

EC/BF

An Roinn Leanaí, Comhionannais,
Míchumais, Lánpháirtíochta agus Óige
Department of Children, Equality,
Disability, Integration and Youth



27th January 2025

**Sagcon Holdings Ltd and Join Property Property Investments Ltd,
Cregboy,
Claregalway,
Co. Galway.**

RE: Application for Planning Exemption - Provision of Accommodation for International Protection Applicants at Castlebar Family Accommodation Centre, N5 Business Park, Castlebar Town, Co. Mayo. F23 EA47

To whom it may concern,

The Department is currently seeking offers of accommodation for properties which have a full grant of planning permission for use as International Protection accommodation or properties which may avail of the Class 14H or 20F exemptions as per the Planning and Development Regulations. The above property has been offered to the Department as temporary emergency accommodation for International Protection applicants subject to grant of a planning exemption. We would therefore request that this correspondence be taken as evidence of engagement with the Department regarding the proposed change of use of the property named above.

I can confirm that the Department is interested utilising the above property for the accommodation of International Protection applicants subject to all planning, change of use, building control, Certificate of Compliance on Completion (CCC), fire and insurance certifications being in place and subject to contract/contract denied.

If you have any queries regarding the above, please contact me at jpps@equality.gov.ie.

Yours sincerely,

Seán Woods
Higher Executive Officer
International Protection Procurement Services

An Roinn Leanaí
Comhionannais, Míchumais
Lánpháirtíochta agus Óige
Department of Children
Equality, Disability, Integration
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The Secretary
An Bord Pleanála
61-64 Marlborough Street
Dublin 1
D01 V902

04 June 2025

Our Ref: BMcC SagJoin Castlebar Accommodation – ABP Transport Appeal Letter

Your Ref: P25/7 Appeal – Proposed Accommodation Development, Castlebar

Dear Sir/ Madam,

Transport Insights has been commissioned by Brock McClure (BMcC) Planning and Development Consultants on behalf of SagJoin Partnership to prepare a Transport Appeal Letter to An Board Pleanála (ABP) in relation to a Decision by Mayo County Council (MCC) to refute a declaration of planning exemption for a development at Unit 8 (First Floor), N5 Business Park, Moneen, Castlebar, Co. Mayo.

Overview and Planning History

A request of a Declaration under Section 5 of the Planning and Development Act, 2000 for a change of use from retail/commercial (shop) to Temporary International Protection at the premises at Castlebar was made to MCC 13 January 2025.

Following consideration of the request, a request for Further Information (FI) was issued by MCC on the 06 February 2025. The FI Request contained 3 no. items, in addition to an Advice Note which stated the following: *“Mayo County Council remain to be convinced that the development would not endanger public safety by reason of traffic hazard or obstruction of road users and your conclusion reached in response to same i.e. there will be no adverse traffic impacts arising from the proposed change of use, either to residents of the Temporary international protection facility or other road users. As the residents who will have access to private modes of transport is considered to be less than the number of persons that would use private modes of transport to access and egress the site if the use of the 1st floor was converted to office space. A use that has been granted for a number of other units within the retail/commercial park.”*

In order to allay concerns outlined by MCC, in particular that the development would *“endanger public safety by reason of traffic hazard or obstruction of road users”*, Transport Insights prepared a Transport Technical Note (TTN, appended to this letter) in support of the FI Response. The TTN examined the site’s receiving environment, set out the traffic characteristics of the proposed development, and outlined likely traffic impacts associated with the development, and concluded that the proposed development would not materially impact on the operation of the adjoining road network in terms of traffic congestion or traffic safety.

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Following consideration of the FI Response, MCC concluded that:

- (i) As there does not appear to ever have been a retail/commercial (shop) use on the first floor of Unit 8, N5 Business Park, Moneen, Castlebar, Co. Mayo, Class 20F Planning and Development (Exempted Development) (No. 4) Regulations 2022 does not apply in this instance
- (ii) Development to which Article 6 relates shall not be exempted development for the purposes of the Act – if the carrying out of such development would endanger public safety by reason of traffic hazard or obstruction of road users.

A response to Item (i) above is provided by Brock McClure Planning and Development Consultants. In relation to Item (ii), no supporting evidence has been made available to the applicant to substantiate the claim by MCC that the development would endanger public safety by reason of traffic hazard or obstruction of road users.

Traffic Hazard or Obstruction of Road Users

The TTN prepared in support of the FI Request and submitted to MCC for consideration clearly set out the traffic characteristics of the proposed development, and also provided a comparison between the proposals and the permitted use on site.

As set out within the TTN, the existing permitted development comprises of a single floor (level 1) of Unit 8 of the N5 Business Park. This floor has permission, and has been used for, retail/commercial (shop). The proposed development is for a facility for temporary accommodation seekers (comprising of 25 no. rooms and 100 no. beds), of which the occupants are to comprise of families. Therefore, the proposed development shall have unique trip generation characteristics.

Table 4.1 of the TTN sets out each development type and the comparative trip characteristics, informed by the industry standard TRICS trip generation database. Using this database, the TTN estimated that a total of 13 no. two-way trips per day would be generated by the proposed development, taking into account the different vehicle trip generators associated with the development. This equates to ca. 1-2 trips per hour, based upon an operational time window of 15 hours, from 07:00-21:00hrs.

This volume of trips is a small fraction of that which would be associated with a commercial premises of this size (see Table 4.1) and is not envisaged to result in adverse impact of the local road network in the vicinity of the application site, and in particular within the N5 Business Park and is significantly lower than the permitted land use. Based on the location of the Accommodation Centre in close proximity to Castlebar Town centre, and public transport services, the majority of temporary residents are assumed to travel by comprising of walking, cycling and public transport.

Conclusion

We trust you will give thorough consideration to the contents of this letter which address the issues raised in Item (ii) of the decision by MCC to refuse change of use from retail/commercial (shop) to Temporary International Protection at the application site.



The proposed development is well located and suitable for its intended use, with no evidence to suggest that its traffic characteristics would result in a traffic hazard or cause any associated obstruction of road users. It is therefore recommended that ABP confirm the change of use proposal is exempted development as per Section 5 of the Planning and Development Act, 2000.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Eoin Munn', written over a horizontal line.

Eoin Munn
Director

Transport Technical Note

Proposed Accommodation Development at Castlebar, Co. Mayo

Contract Number	C1258
Topic	Transport Technical Note for proposed accommodation development at Castlebar, Co. Mayo
Version Number	v1.2
Status	Final
Author	Garret Murphy
Reviewer	Eoin Munn
Date	27 March 2025

1. Introduction

Transport Insights has been appointed by Brock McClure Planning & Development Consultants to prepare a Transport Technical Note (TTN) in support of a change of use planning application for an existing retail/commercial (shop) unit to Temporary International Protection accommodation. The site is located on the first floor of Unit 8 of the N5 Business Park in Castlebar, Co. Mayo. This TTN seeks to address transport related items raised by Mayo County Council (MCC) within a Further Information Request (FIR) issued during February 2025 (MCC Reg. Ref. P25/7).

2. Recent Planning History

2.1. Current Planning Application and FIR

An application for planning permission for change of use from retail/commercial (shop) to Temporary International Protection accommodation of the first floor of Unit 8 of the N5 Business Park was submitted to MCC on the 13 January 2025. Following consideration of the application, a FIR was issued by MCC on the 06 February 2025. The FIR contained 3 no. items, in addition to an Advice Note which stated the following: “Mayo County Council remain to be convinced that the *development would not endanger public safety by reason of traffic hazard or obstruction of road users* and your conclusion reached in response to same i.e. *there will be no adverse traffic impacts arising from the proposed change of use, either to residents of the Temporary*

international protection facility or other road users. As the residents who will have access to private modes of transport is considered to be less than the number of persons that would use private modes of transport to access and egress the site if the use of the 1st floor was converted to office space. A use that has been granted for a number of other units within the retail/commercial park.”

2.2. Additional Relevant Planning History

An application for planning permission at the subject site was submitted to MCC on the 23 October 2024 with regards to a Section 5 Declaration which sought to clarify “if the property qualifies for exemption based on its accommodation of individuals under international protection (IP) as per Planning & Development (exempted development) (No.4) Regulations 2022” (MCC Reg. Ref. 24551).

A decision to refuse permission was issued by MCC on the 18 November 2024, with Reason 2 of the decision pertaining to traffic and transport, as follows: “2. *Development to which Article 6 relates shall not be exempted development for the purposes of the Act under Article 9 (1)(iii) (Restrictions on Exemption) Planning and Development Regulations 2001 (as amended), if the carrying out of such development would endanger public safety by reason of traffic hazard or obstruction of road users.”.*

This TTN has sought to address the traffic related Advice Note raised within the FIR (“*that the development would not endanger public safety by reason of traffic hazard or obstruction of road users*”). It is noted that this item contains similar content to that Reason 2 for refusal of the application Reg. Ref. 24551.

3. Site Location and Context

3.1. Existing Site Location

The application site comprises the first floor of Unit 8 of the N5 Business Park, which is located in close proximity (ca. 1.3 kilometres) to the northeast of Castlebar, Mayo. Unit 8 is located to the rear of N5 Business Park, which itself is located on the edge of Castlebar Town. The application site is currently bounded by a Roadstone Quarry to the north, commercial units of the N5 Business Park to the southeast and southwest, and by a greenfield site to the northwest. Access to the N5 Business Park is via the R373, which provides access to the R310 (Rush Street) to the west, and connects with the R308 to the east (which itself provides a direct connection both the N5 and N60 national roads). The strategic location of the application site is provided within Figure 1 overleaf, with a more localised site location graphic presented within Figure 2 that follows.

Figure 1 Development Site Location

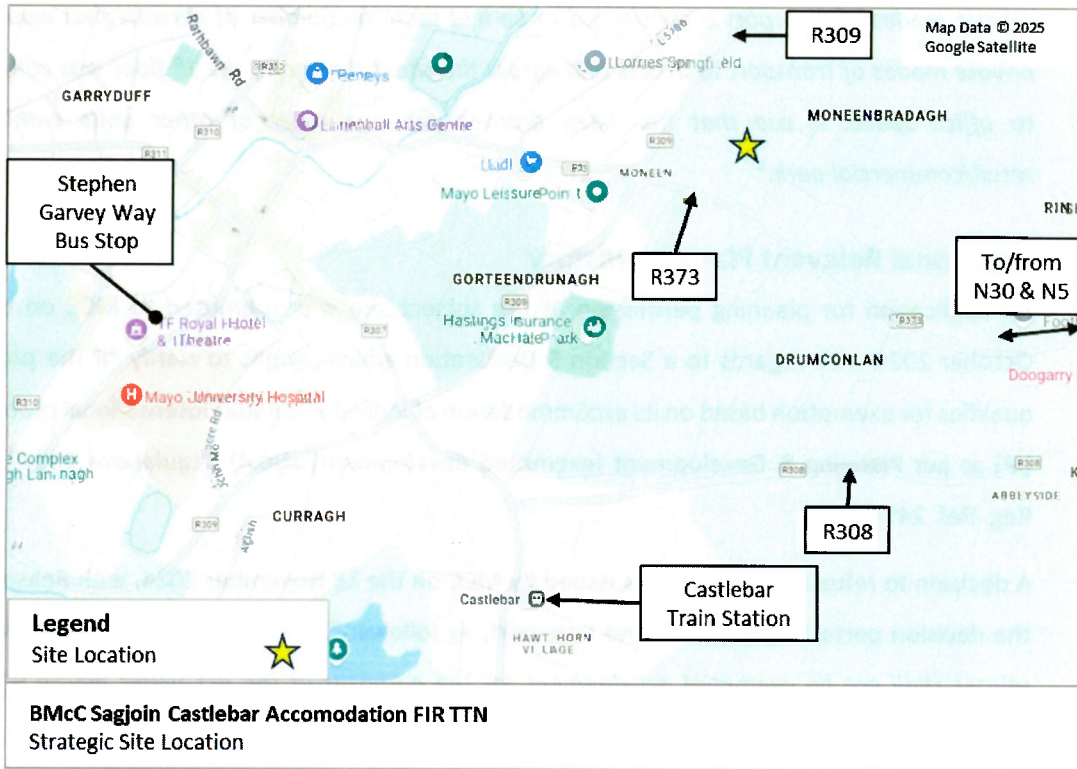
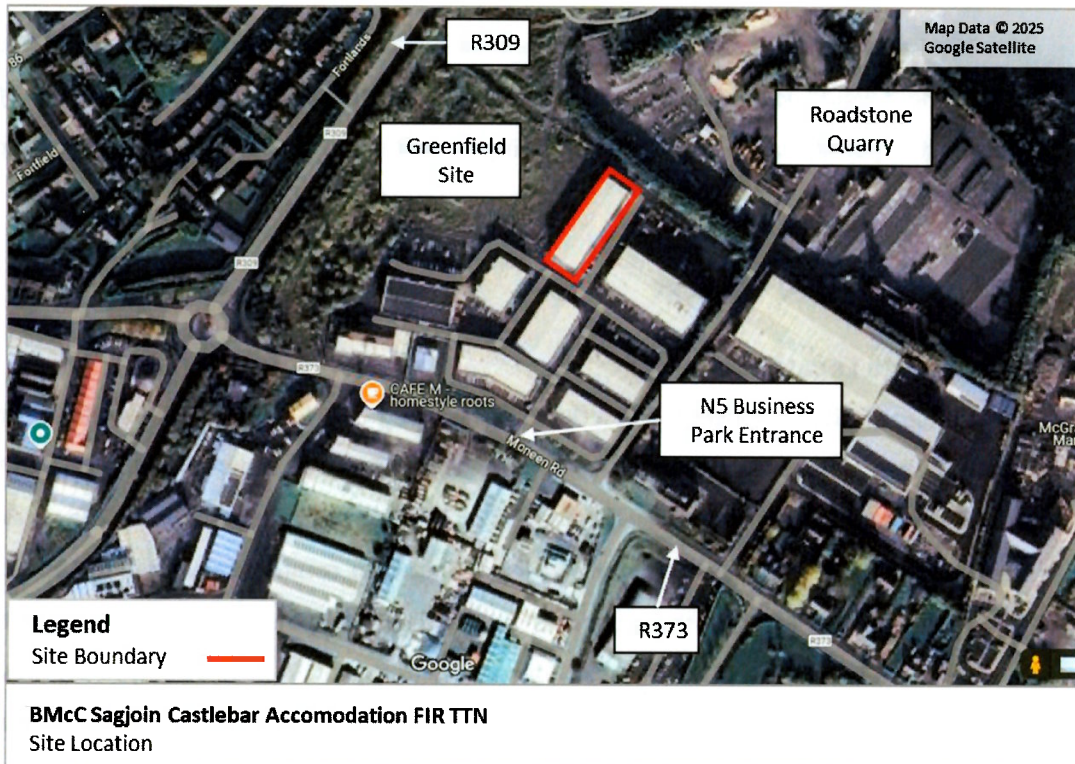
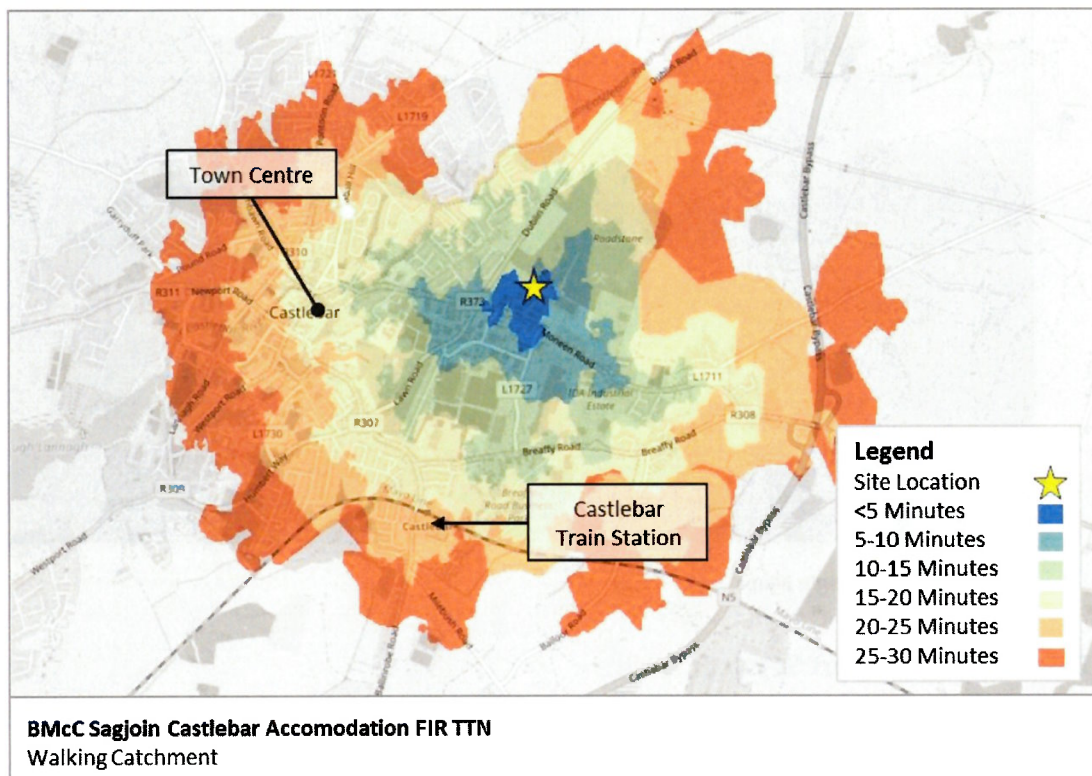


Figure 2 Development Site Location



As can be seen from Figures 1 and 2 above, the application site is located in close proximity to Castlebar Town, with a large variety of services and amenities available within walking distance, which include shops, supermarkets, schools, offices, restaurants, places of worship, medical facilities, sports facilities/centres and more. Included within this walking catchment are a number of public transport services. The site's accessibility by walking has been assessed using geographic information systems (GIS) software, and has been graphically mapped as shown within Figure 3 below.

Figure 3 Application Sites Walking Catchment



3.2. Local Road Network

R373 (Moneen Road)

The application site is accessed via the R373/N5 Business Park site access road priority controlled junction, as can be seen from Figure 4 overleaf (using available Google Street Imagery from 2023). The R373 is a two-way regional road that passes to the south of the application site and links the R308 (which itself connects to the N60 and N5 national roads) to the east with the R310 (Rush Street) to the west. In the vicinity of the application site the R373 has a carriageway width of ca. 9 metres, with 1 no. westbound and eastbound lanes separated by a right turning lane which accommodates turning movements from the R373 into the N5 Business Park. In the vicinity of the entrance to the N5 Business Park the vertical alignment of the R373 is flat and the horizontal

alignment is generally straight (with a slight bend in the road to the northwest). Footpaths and streetlights are provided on both sides of the road. A posted speed limit of 50km/h is in effect along the R373 in the vicinity of the application site. The road provides a direct connection to both Castlebar Town to the west as well as the national road network to the east.

Figure 4 R373 (Moneen Road)*



*Image Source: Google Maps

3.3. Public Transport Services

Public transport services available within walking distance from the application site are in the form of rail and bus, as elaborated upon below.

Bus Services

There are a number of bus stops located throughout Castlebar Town, with the most connected stops located at Stephen Garvey Way, ca. 2.0 kilometres, ~ 29 minutes' walk to the southwest of the application site. There is a bus stop located on each side of the road, accommodating bus services in opposite directions. An overview of the services that are provided at each stop are outlined below, demonstrating that there is a comprehensive provision of bus services available for future residents of the proposed development.

Stop ID: 151021

- 430 (Ballina (Dunnes Stores) – Galway Cathedral)

- 440 (Athlone – Westport, via Knock)
- 442 (Charlestown – Roundfort, via Castlebar)
- 454 (Ballina – Castlebar)
- 456 (Galway – Castlebar, via Westport)
- 721 (Castlebar – Dublin Airport)
- 978 (Belmullet – Castlebar)

Stop ID: 555721

- 420 (Ballina – Castlebar, via Pontoon)
- 430 (Ballina (Dunnes Stores) – Galway Cathedral)
- 440 (Athlone – Westport, via Knock)
- 454 (Ballina – Castlebar)
- 498 (Glenamoy – Stephen Garvey Way Castlebar)
- 978 (Belmullet – Castlebar)
- Expressway 52 (Ballina – Castlebar – Galway)

Rail Services

Castlebar Train Station is located ca. 1.6 kilometres (~22 minutes' walk) to the south of the application site, which accommodates an intercity service in the form of the Dublin Heuston - Westport and Ballina service.

4. Development Proposal

4.1. Introduction

This section of the TTN describes key physical attributes of the proposed development, including site access and internal site layout arrangements.

4.2. Proposed Development Overview

The proposed development comprises the change of use from retail/ commercial (shop) to Temporary International Protection Accommodation of the first floor of Unit 8 of the N5 Business Park. There shall be a total of 25 no. temporary resident rooms, with a total of 100 no. beds within the proposed development. The development is intended to provide accommodation for families in the form of a Family Centre, thus occupants will primarily be parents and children.

4.3. Proposed Site Access

Access to Unit 8 from the public road network is provided via a shared access into the N5 Business Park from the R373. The current access accommodates pedestrian, cyclist and vehicular movements. Footpaths are provided throughout the existing N5 Business Park, and are present along the southern and eastern sides of Unit 8.

5. Development Traffic Impact

5.1. Permitted and Proposed Development Trip Generation

The existing permitted development comprises of a single floor (level 1) of Unit 8 of the N5 Business Park. This floor has permission, and has been used for, retail/commercial (shop).

The proposed development is for a facility for temporary accommodation seekers (comprising of 25 no. rooms and 100 no. beds), of which the occupants are to comprise of families. Therefore, the proposed development shall have unique trip generation characteristics.

In order to make a reliable comparison between the two land uses, the industry standard TRICS trip generation database has been used. For the permitted development, trips have been generated using the land use – 01-Retail – K-Retail Park Excluding Food. For the proposed development, a shared accommodation model was deemed to be the closest match on the database as it reflects the shared facilities to be provided on-site – 03-Residential – Shared Living Developments.

It is also noted that an existing school bus service is to be utilised to accommodate trips to/ from school for children of the proposed Accommodation Centre. This existing school bus service currently undertakes collection and drop-off activities for children residing a neighbouring unit within the N5 Business Park (which has also been converted to accommodate temporary accommodation seekers), ca. 100 metres to the southwest of Unit 8. With the provision of this service, the travel needs of children commuting to/ from school shall be facilitated, negating the need for private car trips. This emphasises the robust nature of the trip generation exercise.

The following Table 4.1 outlines the anticipated trips for both the proposed and permitted land uses on-site.

Table 4.1 Development and Comparative Development Trip Generation

Criteria	Residential (Accommodation)	Commercial (Retail Park excluding Food)
No. Residents	100	-

Criteria	Residential (Accommodation)	Commercial (Retail Park excluding Food)
No. Rooms/GFA	25	1,733 sqm GFA
Assumed Average Family No.	4	-
Peak Hour Trip Rate (two-way)	0.024	1.294 per 100 sqm
Peak Hour Trips (08:00-09:00hrs)	2	22
Daily Trip Rate	0.125	46.33
Daily Trips (07:00-21:00hrs)	13	803

*07:00-21:00hrs

5.2. Development Traffic Impact

As can be seen from Table 4.1 above, it is estimated that a total of 13 no. two-way trips per day shall be generated by the proposed development, taking into account the different vehicle trip generators associated with the development. This equates to ca. 1-2 trips per hour, based upon an operational time window of 15 hours, from 07:00-21:00hrs. **This volume of trips is not envisaged to result in adverse impact of the local road network in the vicinity of the application site, and in particular within the N5 Business Park and is very significantly lower than the permitted land use.**

Based on the location of the Accommodation Centre in close proximity to Castlebar Town centre, and public transport services, the majority of temporary residents are assumed to travel by comprising of walking, cycling and public transport.

6. Summary and Conclusion

6.1. Summary

Overview

Transport Insights has been commissioned by Brock McClure Planning & Development Consultants to prepare a Transport Technical Note (TTN) that will form part of a Further Information Request (FIR) response in support of a proposed change of use from retail/commercial (shop) to Temporary International Protection Accommodation of the first floor of Unit 8 of the N5 Business Park located in Castlebar, Co. Mayo (Planning Ref. 257).

Receiving Environment

The site currently comprises of the first floor of Unit 8 of the N5 Business Park and is located to the rear of the existing N5 Business Park. The N5 Business Park comprises a number of different use types, with a mixture of retail/commercial, office and other land use accommodated within the Park.

Proposed Development

The proposed development comprises change of use of the first floor of Unit 8 of the N5 Business Park from retail/commercial use to Temporary International Protection Accommodation.

Vehicular access to the site is to be taken from the R373 via the existing N5 Business Park. The existing access layout is deemed satisfactory in accommodating the proposed change of use.

Traffic Impact

The proposed change of use development is expected to have a negligible impact on the local road network, with its trip generation rates demonstrated to be significantly lower than that generated by the existing permitted retail/ commercial use.

6.2. Conclusion

In conclusion, the proposed development is not predicted to materially impact on the operation of the adjoining road network in terms of traffic congestion or traffic safety.

The statement that *“there will be no adverse traffic impacts arising from the proposed change of use, either to residents of the Temporary international protection facility or other road users. As the residents who will have access to private modes of transport is considered to be less than the number of persons that would use private modes of transport to access and egress the site if the use of the 1st floor was converted to office space”* has been demonstrated to be accurate.

Appendix A TRICS Trip Rate Data

TRICS 7.11.4

Trip Rate P: Accommodation Units

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use 03 - RESIDENTIAL

Category Q - SHARED LIVING DEVELOPMENTS

MULTI-MODAL TOTAL VEHICLES

Selected regions and areas:

1 GREATER LONDON

BT BRENT 1 days

This section displays the number of survey days per TRICS* sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Accommodation Units

Actual Range 550 to 550 (units:)

Range Selected 550 to 550 (units:)

Public Transport Provision:

Selection Include all surveys

Date Range 01/01/16 to 05/03/20

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Thursday 1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count 1 days

Directional 0 days

This data displays the total amount of surveys whilst ATC surveys are undertaken using machines.

Selected Locations:

Town Centre 0

Edge of Town 0

Suburban Area 1

Edge of Town 0

Neighbourhood 0

Free Standing 0

Not Known 0

This data displays the total amount of surveys by location: Edge of Town, Suburban Area, Neighbourhood, Edge of Town, Town Centre and Not Known.

Selected Location Sub Categories:

Industrial Zone 1

Commercial 0

Development 0

Residential 0

Retail Zone 0

Built-Up Zone 0

Village 0

Out of Town 0

High Street 0

No Sub Category 0

This data displays the total amount of surveys by sub-category: Industrial Zone, Development, Residential, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

n/a 1 days

This data displays the number of surveys which can be found within the Library module of TRICS*.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

25,001 to 5 1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

500,001 or 1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0 1 days

This data displays the number of selected surveys within a radius of 5-miles of selected survey sites.

Travel Plan:

No 1 days

This data displays the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

4 Good 1 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1 BT-03-Q-01 CO-LIVING BRENT
 OLD OAK LANE
 OLD OAK
 PARK ROYAL
 Suburban Area (PPS6 Out of Centre)
 Industrial Zone
 Total Accommodation Units 550
 Survey date THURSDAY ##### Survey Type MANUAL

This section displays the selected day of 1 and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/Q - SHARED LIVING DEVELOPMENTS

Calculation Factor: 1 Accommodation Units

Count Type: TOTAL VEHICLES

Time Range	No. Days	ARRIVALS			DEPARTURES			TOTALS		Arrivals	Departures	Total
		Ave. A. UNITS	Trip Rate	No. Days	Ave. A. UNITS	Trip Rate	No. Days	Ave. A. UNITS	Trip Rate			
00:00-01:00												25 units
01:00-02:00												100 people
02:00-03:00												
03:00-04:00												
04:00-05:00												
05:00-06:00												
06:00-07:00												
07:00-08:00	1	550	0.005	1	550	0.004	1	550	0.009	1	0	1
08:00-09:00	1	550	0.005	1	550	0.011	1	550	0.016	1	1	2
09:00-10:00	1	550	0.011	1	550	0.013	1	550	0.024	1	1	2
10:00-11:00	1	550	0.007	1	550	0.007	1	550	0.014	1	1	1
11:00-12:00	1	550	0.004	1	550	0.004	1	550	0.008	0	0	1
12:00-13:00	1	550	0.004	1	550	0.004	1	550	0.008	0	0	1
13:00-14:00	1	550	0.004	1	550	0.005	1	550	0.009	0	1	1
14:00-15:00	1	550	0.002	1	550	0.004	1	550	0.006	0	0	1
15:00-16:00	1	550	0	1	550	0	1	550	0	0	0	0
16:00-17:00	1	550	0	1	550	0	1	550	0	0	0	0
17:00-18:00	1	550	0.009	1	550	0.009	1	550	0.018	1	1	2
18:00-19:00	1	550	0.004	1	550	0.002	1	550	0.006	0	0	1
19:00-20:00	1	550	0.005	1	550	0.002	1	550	0.007	1	0	1
20:00-21:00	1	550	0	1	550	0	1	550	0	0	0	0
21:00-22:00								0.125				13
22:00-23:00												
23:00-24:00												
Daily Trip Rates:			0.06			0.065			0.125			

Parameter summary

Trip rate pa 550 - 550 (units:)

Survey date 01/01/16 - 05/03/20

Number of 1

Number of 0
Number of 0
Surveys aut 0
Surveys ma 0

This section followed by the total number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRICS 7.11.4

Trip Rate Per Gross floor area

TRIP RATE for Land Use 01 - RETAIL/K - RETAIL PARK - EXCLUDING FOOD

Calculation Factor: 100 sqm

Count Type: TOTAL VEHICLES

Time Range Days	ARRIVALS			DEPARTURES			TOTALS			17.33			
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip				
	GFA	Rate	Days	GFA	Rate	Days	GFA	Rate					
00:00-01:00													
01:00-02:00													
02:00-03:00													
03:00-04:00													
04:00-05:00													
05:00-06:00													
06:00-07:00	2	8070	0.143	2	8070	0.05	2	8070	0.193	2.5	0.9	3.3	
07:00-08:00	5	12008	0.406	5	12008	0.345	5	12008	0.751	7.0	6.0	13.0	
08:00-09:00	5	12008	0.779	5	12008	0.515	5	12008	1.294	13.5	8.9	22.4	
09:00-10:00	5	12008	1.672	5	12008	1.264	5	12008	2.936	29.0	21.9	50.9	
10:00-11:00	5	12008	1.834	5	12008	1.606	5	12008	3.44	31.8	27.8	59.6	
11:00-12:00	5	12008	2.267	5	12008	2.092	5	12008	4.359	39.3	36.3	75.5	
12:00-13:00	5	12008	2.477	5	12008	2.393	5	12008	4.87	42.9	41.5	84.4	
13:00-14:00	5	12008	2.437	5	12008	2.497	5	12008	4.934	42.2	43.3	85.5	
14:00-15:00	5	12008	2.044	5	12008	2.214	5	12008	4.258	35.4	38.4	73.8	
15:00-16:00	5	12008	1.877	5	12008	1.924	5	12008	3.801	32.5	33.3	65.9	
16:00-17:00	5	12008	1.895	5	12008	1.987	5	12008	3.882	32.8	34.4	67.3	
17:00-18:00	5	12008	1.929	5	12008	1.862	5	12008	3.791	33.4	32.3	65.7	
18:00-19:00	5	12008	1.784	5	12008	1.854	5	12008	3.638	30.9	32.1	63.0	
19:00-20:00	5	12008	1.279	5	12008	1.561	5	12008	2.84	22.2	27.1	49.2	
20:00-21:00	5	12008	0.533	5	12008	0.816	5	12008	1.349	46.336	9.2	14.1	23.4
21:00-22:00	3	9463	0.232	3	9463	0.321	3	9463	0.553				803.0
22:00-23:00	1	6790	0.118	1	6790	0.206	1	6790	0.324				
23:00-24:00	1	6790	0.118	1	6790	0.147	1	6790	0.265				
Daily Trip Rates:			23.824			23.654			47.478				