

2 PLANNING AND POLICY CONTEXT

This chapter reviews the proposed road project in the context of European and national transport policy and with national, regional and local planning policy.

In the context of the policies set out below, the proposed road project is of both international and national significance as well as a very important infrastructure project in the regional and local development context.

Transport Policy

- Infrastructure - TEN-T - Connecting Europe, 2014.
- North Sea-Mediterranean Second Work Plan of the European Coordinator, December 2016.
- TEN-T Network Regulations, 2013.
- National Ports Policy, 2013.
- Department of Transport: Statement of Strategy, 2016 - 2019.
- Investing in our Transport Future: A Strategic Investment Framework for Land Transport, 2015.
- Spatial Planning and National Roads: Guidelines for Planning Authorities, 2012.
- Smarter Travel, A New Transport Policy for Ireland, 2009 - 2020.
- NRA Service Area Policy, 2014.

Planning Policy

- National Development Plan, 2007 - 2013.
- Building on Recovery: Infrastructure and Capital Investment, 2016 - 2021.
- National Spatial Strategy, 2002 - 2020.
- Towards a National Planning Framework: Ireland 2040 Our Plan - Issues and Choices, DHPCLG February 2017.
- Our Sustainable Future: A Framework for Sustainable Development, 2020.
- Regional Planning Guidelines for the South West Region, 2010 - 2022.
- Cork Area Strategic Plan (CASP): Strategy of Additional Economic and Population Growth - Update 2008.
- Cork County Development Plan, 2009 - 2015.
- Cork County Development Plan, 2014 - 2020.
- Cork City Development Plan 2015 - 2021.
- Carrigaline Electoral Area Local Area Plan, 2011 (as amended).
- Draft Carrigaline - Ballincollig Municipal District Local Area Plan, 2016.

2.1 TRANSPORT POLICY

2.1.1 Infrastructure - TEN-T - Connecting Europe, 2014

As of January 2014, the European Union has a transport infrastructure policy entitled 'Infrastructure - TEN-T - Connecting Europe' which refers to the Trans European Network that connects the continent between east and west, north and south. This policy aims to close the gaps between member states' transport networks, and act as the economic life-blood of the Single Market.

The core network corridors were introduced by the European Commission to facilitate the coordinated implementation of the TEN-T dimensions requirements. Core network corridors bring together public and private resources and concentrate EU support from the Connecting Europe Facility (CEF) funding instrument. CEF Transport focuses particularly on removing bottlenecks, building missing cross-border connections and promoting modal integration and interoperability.

Nine core network corridors are identified in the annex to the CEF Regulations which includes a list of projects pre-identified for possible EU funding during the period 2014-2020, based on their added value for TEN-T development and their maturity status.

Ireland has one core network corridor crossing its country which comprises of the North Sea Mediterranean Corridor. Refer to **Figure 1.5** in **Chapter 1: Introduction and Need for the Proposed Road Development** and **Figure 2.1**.

The North Sea-Mediterranean Corridor stretches from Ireland and the north of UK through the Netherlands, Belgium and Luxembourg to the Mediterranean Sea in the south of France. This multimodal corridor, incorporates inland waterways in Benelux and France, aims not only at offering better multimodal services between the North Sea ports, the Maas, Rhine, Scheldt, Seine, Saone and Rhone river basins and the ports of Fos-sur-Mer and Marseille, but also better at interconnecting the British Isles with continental Europe.

The EU invited Member States to propose projects to avail of EU funding to improve European transport connections. This forms the largest ever single amount of EU funding earmarked for transport infrastructure. The funding is to be concentrated along the nine major transport corridors which, taken together, will form a core transport network.

The funding will be attributed to the most competitive projects and focused on nine major transport corridors in Europe.

Ireland has been successful in its bid to win funding for the Port of Cork Ringaskiddy Redevelopment as part of the North Sea Mediterranean Core Network Corridor. It will receive EU funds but must be co-financed by member states. The EU Commission states as follows in relation to the Port of Cork's Ringaskiddy Redevelopment:

Cork is an identified core port located on the North Sea-Mediterranean Core Network Corridor. The Action will expand and develop the State owned deep water port facility at Ringaskiddy in order to make its operations more competitive, efficient, sustainable and responsive to current and projected growth in trade.

To that end it will remove the bottlenecks identified in the Corridor work plan, relocate the existing container terminal at Tivoli to Ringaskiddy, build a new 'fit for purpose' terminal at Ringaskiddy, handle projected growth in trade, facilitate access of larger vessels to the deep water port, reduce the port's carbon footprint, connect Ringaskiddy to its hinterland and improve the region's overall competitiveness.

A work plan has been drawn up for each corridor. The latest work plans were initially approved in June 2015 and establish the basis for member state action until 2030.

2.1.2 North Sea Mediterranean Second Work Plan of the European Coordinator, December 2016

The Work Plan for the North Sea-Mediterranean Corridor, produced by the European Commission, notes under the section *Road Standard* – that core links are required to be either motorways or express roads. In the North-Sea Mediterranean Corridor, virtually all of the core links comply with this standard, but there are certain last mile connections to seaports, including Zeebrugge and Cork, where current road standards are not adequate for the level of traffic. This Work Plan recognises the need to upgrade the current access route to Ringaskiddy.

In Ireland, road connections inland are paramount, allowing the heavy goods traffic generated by the ports to directly reach the motorway (core and comprehensive) network in the country. This particular aspect and its relevance to Ireland is also recognised in the work plan.

The North Sea Mediterranean Work Plan also states that *'further work is likely to be required in the United Kingdom and Ireland for secure parking areas for Heavy Good Vehicles with, for example, security fencing and CCTV.'*(p.8), this recognises the need for service areas on core network, particularly targeting the needs of HGV drivers.

The Work Plan states that *'In Ireland, where rail currently plays a minor role in freight transport, and where there are no commercial waterways, road projects are essential for maintaining accessibility to and from seaports.'* (p.24)

The Work Plan states that Seaports are required to offer rail connections by 2030 unless physical constraints prevent such connection. (p.9)

In Ireland, road connections inland are paramount, allowing the heavy goods traffic generated by the ports to bypass the immediate urban areas in order to reach the motorway network. The proposed M28 Road Project and Service Area will deal with a number of the issues raised within the Work Plan including provision of a core link motorway / express road to the Port of Cork (in Ringaskiddy), secure parking for heavy goods vehicles.

In European terms, the efficient functioning of the North Sea Mediterranean Corridor is vital to the functioning of the Single Market and European trade. For the core maritime port of Cork it is effectively the last mile connection that is missing. The provision of the M28 Cork to Ringaskiddy Project will complete high quality core network connectivity for the port in line with European requirements.

2.1.3 TEN-T Network Regulations

2.1.3.1 Regulation 1315/2013

The TEN-T network is being developed through a dual-layer structure consisting of a comprehensive network and a core network, these two layers being the highest level of infrastructure planning within the European Union. Roads forming part of the TEN-T network are to be high quality roads, designed and built for motor traffic.

Article 41(2)g of **REGULATION (EU) No 1315/2013** in Chapter III which refers to the Core Network states that Marine Ports of the core network shall be connected with the railway and road transportation infrastructure of the TEN-T by 31st December 2030. This is the target date set in the Regulations for delivery of the core network. Therefore this would indicate that the core marine ports are envisaged to be connected to the core transport network by 2030. Relevant sections from Chapters II and III, including Articles 17 and 39, are quoted below in italics.

Article 17 Infrastructure Components

3. *High-quality roads shall be specially designed and built for motor traffic, and shall be either motorways, express roads or conventional strategic roads.*

(a) *A motorway is a road specially designed and built for motor traffic, which does not serve properties bordering on it and which:*

(i) *is provided, except at special points or temporarily, with separate carriageways for the two directions of traffic, separated from each other by a dividing strip not intended for traffic or, exceptionally, by other means;*

(ii) *does not cross at grade with any road, railway or tramway track, bicycle path or footpath; and*

(iii) *is specially sign-posted as a motorway.*

(b) *An express road is a road designed for motor traffic, which is accessible primarily from interchanges or controlled junctions and which:*

(i) *prohibits stopping and parking on the running carriageway; and*

(ii) *does not cross at grade with any railway or tramway track.*

(c) *A conventional strategic road is a road which is not a motorway or express road but which is still a high-quality road as referred to in paragraphs 1 and 2.*

Article 39 Infrastructure Requirements

2. *The infrastructure of the core network shall meet all the requirements set out in Chapter II. In addition, the following requirements shall be met by the infrastructure of the core network, without prejudice to paragraph 3:*

(a) for road transport infrastructure:

- *the requirements under points (a) or (b) of Article 17(3);*
- *the development of rest areas on motorways approximately every 100 km in line with the needs of society, of the market and of the environment, in order inter alia to provide appropriate parking space for commercial road users with an appropriate level of safety and security;*
- *availability of alternative clean fuels.*

Figure 2.1: Comprehensive and Core Network: Roads, Ports, Rail Road Terminals and Airports (Republic of Ireland) -Source DTTAS



2.1.3.2 Main International Traffic Arteries

In the EIA Directive (85/337/EEC) ‘express road’ means a road that complies with the definition in the European Agreement on Main International Traffic Arteries of 15 November 1975. The Economic Commission for Europe - Inland Transport Committee documented the consolidated text of the *European Agreement on Main International Traffic Arteries* (AGR) in March 2008. Included in this document are the conditions to which the Main International Traffic Arteries should conform. According to this document:-

“Motorway” means a road specially designed and built for motor traffic, which does not serve properties bordering on it, and which:

- (i) Is provided, except at special points or temporarily, with separate carriageways for the two directions of traffic, separated from each other by a dividing strip not intended for traffic or, exceptionally, by other means;*
- (ii) Does not cross at level with any road, railway or tramway track, or footpath; and*
- (iii) Is specially sign-posted as a motorway*

and

‘an express road is a road reserved for motor traffic, accessible only from interchanges or controlled junctions only, and which:

- (i) Prohibits stopping and parking on the running carriageway(s); and
- (ii) Does not cross at level with any railway or tramway track, or footpath.

2.1.3.3 Irish Legislation – Roads Act

The Roads Act 1993, revised in 2015 defines a ‘motorway’ as:-

- a) a public road or proposed public road specified to be a motorway in a motorway scheme approved under section 49, or*
- b) a national road or a proposed road development for the construction of a national road declared to be a motorway under section 8 of the Roads Act 2007.*

Particular requirements for motorways are included in the Act:-

- No rights to access a motorway from adjacent lands or to access adjacent lands from a motorway.
- The Minister may prescribe certain classes of vehicles from using a motorway. In Ireland this translates to restrictions on Learner Drivers, pedestrians, cyclists and other generally slower moving vehicles including agricultural vehicles. Such prescriptions may be applied to motorways generally, particular motorways or particular parts of particular motorways.

- The Minister may also prescribe conditions in relation to the use of motorways generally, particular motorways or particular parts of particular motorways by vehicles or specified classes of vehicles (including conditions specifying the periods of use of motorways by specified classes of vehicles) and different conditions may be prescribed in relation to different motorways or different classes of vehicles.
- Pedestrians and pedal cyclists shall not use a motorway.
- Persons in charge of or having control over, animals shall not permit them to be on a motorway.
- Stopping is not permitted on motorways except in an emergency situation.

Motorway status as per the Roads Act meets the EU requirements for Core network.

2.1.3.4 Protected Roads

The Roads Act 1993 also provides for the making of national roads into protected roads.

A protected road scheme approved by the Minister may provide for the prohibition, closure, stopping up, removal, alteration, diversion or restriction of any specified or all means of direct access to the protected road from specified land or from specified land used for a specified purpose or to such land from the protected road.

A protected road scheme may prohibit or restrict the use of the protected road or a particular part thereof by:-

- (i) specified types of traffic,
- (ii) specified classes of vehicles,

but shall not prohibit or restrict such use:-

- (i) by ambulances or fire brigade vehicles,
- (ii) by vehicles used by members of An Garda Síochána or the Defence Forces in the performance of their duties as such members,
- (iii) for the purpose of maintaining such protected road.

Protected Roads as per the Roads Act will require the additional requirement of 'Urban Clearway' status in order to achieve the EU requirements for Core network.

2.1.3.5 Service Area

The TEN-T policy highlights the need for parking-rest areas along the European road transport network. These areas must be adapted to the needs of modern logistics in terms of capacity and must provide for a safe and secure environment with adequate rest facilities for drivers and their cargo.

2.1.4 National Ports Policy, DTTAS 2013

Irish ports play a crucial, yet often overlooked role in facilitating economic growth and prosperity. As an island nation Ireland depends on the quality and efficiency of its port services to a great extent.

The National Ports Policy was published by the DTTAS in 2013. This policy document confirms that Cork's maritime port is part of the identified core network which could receive financing from the EU's 'Connecting Europe Facility' (CEF) as part of the TEN-T network.

Section 2.4 refers to the TEN-T network It states that:-

The proposed revision of the European Union's Trans European Network - Transport (TEN-T) consists of a comprehensive transport network, within which there is a core network of high priority. The core network connects the major European urban areas and includes the major European transport corridors, bottlenecks and multimodal hubs. The comprehensive network includes an extensive and dense network of railways, roads, inland waterways, ports, airports and freight terminals.

The revised TEN-T programme will open up possibilities for TEN-T ports to avail of the funding facilities to be put in place through the Connecting Europe Facility, including the proposed Project Bonds. The European Commission made its proposals in October 2011. The proposals are still at a relatively early stage in the European legislative process and it will be 2013, at the earliest, before the final package is adopted.

For inclusion in the core network, ports must enjoy significant volumes of freight and/or passenger traffic, have a high level of international connectivity and, by 2030, be connected to the core European rail and road network.

Section 2.5 of the Ports Policy document refers to Ports of National Significance (Tier 1) and outlines that the criteria used by the European Commission are broadly similar to those used in identifying the Ports of National Significance (Tier 1). These are the ports that:-

- *are responsible for at least 15% to 20% of overall tonnage through Irish ports, and*
- *have clear potential to lead the development of future port capacity in the medium and long term, when and as required.*

Three ports are proposed for inclusion in the TEN-T core network including Dublin, Cork and Shannon Foynes. These ports are also identified in National Ports Policy as Ports of National Significance (Tier 1).

The continued commercial development of these three Ports of National Significance (Tier 1) is a key objective of National Ports Policy. (p. 24)

Section 4.4 of this policy document refers to Hinterland Connections and states that '*Efficient hinterland connections are critically important to any port's ability to facilitate large volumes of traffic. The European Commission's Communication on a European Ports Policy, published in 2007, highlights the importance of reliable and sustainable hinterland connections as part of an integrated transport chain.*

It further states that ‘Such connections will also be an important feature of the revised TEN-T proposals. All TEN-T core ports must be connected to both the TEN-T core road and rail networks.’ (p. 45).

The European Commission’s related ‘*Connecting Ireland*’ document¹ states that:-

*Ireland has 1 Core Network Corridor crossing its country: **The North Sea-Mediterranean Corridor** stretches from Belfast and the Irish ports of Cork and Dublin, as well as from the northern UK ports Glasgow and Edinburgh through Belgium, with a branch from Amsterdam and Rotterdam, via Luxembourg to Strasbourg and Basel and via Lyon to the southern French ports of Fos/Marseille. It covers rail, road, airports, ports, RRT’s and the Dutch-Belgian inland waterway system as well as the Rhône River.*

This Connecting Ireland document also confirms that Cork’s maritime port is part of the identified core network which could therefore receive financing from the EU’s ‘*Connecting Europe Facility*’ (CEF).

2.1.5 Department of Transport: Statement of Strategy, 2016 - 2019

This strategy sets out objectives and actions which are designed to support continuing economic recovery, fiscal consolidation, job creation and social development. It notes that the maritime sector is a critical gateway for the movement of goods between Ireland and its trading partners. Recent trends point towards a steady growth of freight tonnage in line with the wider performance of the economy. Seaborne freight is currently estimated to account for 84% of Ireland’s total trade by volume and 62% in value terms. The strategy includes an action for appropriate public spending and investment in efficient, sustainable, integrated and accessible land transport networks and services.

In regards to maritime, the strategy includes a high level goal to ensure the safety and competitiveness of maritime transport services.

The strategy includes an overarching objective to develop and implement the national ports and shipping policy in order to facilitate a competitive and effective market for maritime transport services. The strategy supports the implementation of the National Ports Policy.

2.1.6 Strategic Framework Investment in Land Transport, DTTAS 2015

The *Strategic Framework on Investment in Land Transport* (SFILT) sets out an evidence based assessment of transport trends in Ireland. It assesses demand for transport based on population and transport demand linking to the economy of the country. It considers modal choice in terms of commuter travel and the movement of goods.

¹ http://ec.europa.eu/transport/themes/infrastructure/doc/ten-t-country-fiches/ie_en.pdf

It notes integration of seaports and airports with land transport modes is an important aspect in ensuring the availability of competitive and efficient transport services that meet the needs of users. Catering for the needs of Ireland’s main exporting sectors should be a key driver of investment decisions. The economy supports a very diverse range of manufacturing and services sectors, each with different transport needs.

The framework establishes investment in land transport as a high level priority. It notes that the development of transport infrastructure results in increased trade, enhanced competitiveness, increased productivity, labour mobility and attractiveness for Foreign Direct Investment. It further identifies land transport policy as playing a central role in supporting important government economic development objectives and in the main exporting sectors nationally. For example, the performance of road sea and air freight is central to the competitiveness of our national manufacturing sector.

SFILT sets three high level priorities for transport investment which are outlined as follows:-

- Maintenance of steady state maintenance and renewal of the transport system;
- Reduction of urban congestion by providing viable alternatives to car travel;
- Maximise the value of the road network through targeted investments that:
 - Enhance the efficiency of the existing network, particularly through the increased use of ITS applications;
 - Improve connections to key seaports and airports and poorly served regions and complete missing links;
 - Support identified national and regional spatial planning priorities;
 - Provide access for large-scale employment proposals; and
 - Address critical safety issues.

Within this context, the proposed road project is compliant with the policies of the SFILT as it particularly provides access to a key seaport and to a large scale employment zone. The proposed road project also facilitates the reduction in urban congestion by removing specific bottlenecks on the existing N28 and by facilitating the provision of alternative sustainable travel modes, as described in **Section 1.2.2** of this EIS.

2.1.7 Spatial Planning and National Roads: Guidelines for Planning Authorities, DoECLG 2012

The Department of the Environment, Community and Local Government (DoECLG) Spatial Planning and National Roads: Guidelines for Planning Authorities were issued under Section 28 of the Planning and Development Act, 2000 (as amended) and relevant authorities are obliged to have regard to them in the performance of their duties under the Planning Acts.

According to these Guidelines, the primary purpose of the national road network is to provide strategic transport links between the main centres of population and employment, including key international gateways such as the main ports and airports and to provide access between all regions.

Section 1.4 of the Spatial Planning and National Roads Guidelines defines strategic traffic, in the context of national roads as primarily comprising of major inter-urban and inter-regional traffic, whether HGV, car, public transport, bus services or other public service vehicles, which contribute to socio-economic development, the transportation of goods and products, especially traffic to and from main ports and airports, both freight and passenger related.

These guidelines have been developed by following a number of key principles and aim to facilitate a well-informed, integrated and consistent approach that affords maximum support for the goal of achieving and maintaining a safe and efficient network of national roads in the broader context of sustainable development strategies, thereby facilitating continued economic growth and development throughout the country. Key principles include:-

- Land use and transportation policies are highly interdependent. This is described as being vital in minimising the need to travel;
- Proper planning is central to ensuring road safety. Therefore, from a road safety perspective, planning authorities, the NRA, road authorities and the Road Safety Authority must guard against a proliferation of roadside developments accessing national roads;
- Development should be plan-led. Accordingly, in preparing development and local area plans, planning authorities must assess the trip generation aspects of any land use zoning objectives and how such trip generation is to be catered for, promoting the use of sustainable modes, while protecting the strategic function of the national roads network.
- Development management is key to plan management and as such development should achieve high standards in relation to traffic management and design quality; and
- Planning Authorities and the National Roads Authority and other public transport providers must work closely together in the course of preparing plans and assessing planning applications to ensure that future development is guided to suitable locations.

The guidelines indicate that TII adopts a 20 year design horizon as the basis for capacity design requirements in order to optimise the economic return on the investment and take account of local authority supplied estimates regarding future population and development patterns, local trends and the aims of achieving compact, sustainable urban development. In planning future new routes, the guidelines state that the TII (NRA) will work with planning authorities in basing new design on robust and reasonable assumptions with regard to future development and the extent to which, if any, traffic generated by such development should be appropriately catered for on the national road network. Development objectives, including the zoning of land, must not compromise the route selection process, particularly in circumstances where road scheme planning is underway and potential route corridor upgrades have been identified and brought to the attention of the planning authority.

Implementation of the guidelines will ensure that the state's considerable investment in national roads is harnessed in a manner that is sustainable in economic, social and environmental terms.

The Spatial Planning and National Roads also provide guidelines to planning authorities on the siting of on-line and off-line motorway service areas. The service area must provide rest, fuel, toilets and food facilities. The guidelines state that a service area should avoid the attraction of short, local trips, avoid a class of traffic that is inconsistent with the primary intended role and cater for long distance, inter-urban and inter-regional traffic.

2.1.8 Smarter Travel: A Sustainable Transport Future, A New Transport Policy for Ireland, DTTAS 2009 – 2020

The Department of Transport, Tourism and Sport published Smarter Travel, A New Transport Policy for Ireland in 2009. This policy document sets key goals, targets and actions in achieving sustainable transport to be achieved by 2020.

Action 12 comprises a broad list of actions to be taken to deliver a more effective public transport system. The proposed motorway can be used by public transport particularly in facilitating express type routes in delivering this action.

Action 13 sets performance targets for public transport in urban areas. The provision of a high quality motorway link available for use by public transport will assist in delivering this action in the motorway catchment area.

Action 14 relates to rural bus services and/or a “local transport bus”. The M28 project provides a high quality corridor potentially for use by these types of services. There will also be an opportunity for use of the existing N28 for rural type bus services and for potential commuting services to neighbouring Carrigaline once reclassified.

Action 15 seeks to develop a strong cycling culture in Ireland. The proposed motorway will not be available to cyclists, however, it will provide for cycling by facilitating the reclassification of the existing N28 to local road status and removal of much of the traffic from this road. Crossing will also be facilitated at relevant points so that the motorway does not act as a barrier to cycling. The M28 project facilitates the Cork Harbour Greenway by way of a connection at Carrigaline.

Action 16 refers to the creation of a culture of walking in Ireland. The proposed motorway, while it will not be available for use by pedestrians will, similarly to cycling, facilitate walking by virtue of the reduction of HGVs and congestion on the exiting N28 and particularly within the villages of Shanbally and Ringaskiddy. Pedestrian connectivity at Rochestown Road and at Maryborough Hill will be improved as part of the road project also.

Action 23 seeks to ensure improved road priority for walking and cycling access to key public transport interchanges and ports. The M28 project has the potential to improve linkages to Europe, facilitate the provision of a greenway link on the existing N28 road linking the ferryport at Ringaskiddy to the Cork Harbour Greenway at Raffeen.

Action 29 refers to Ports Policy and its impact on maximising efficiency in the movement of goods. One of the Strategic Objectives of the M28 Motorway project is to ensure compliance with National Ports Policy and the associated efficient movement of goods. The proposed project is an integral part of the achievement of Action 29.

Action 30 relates to ‘road safety and emissions’ and states that *‘The €18 billion investment in roads as part of Transport 21 will remove bottlenecks, ease congestion and pressure in towns and villages and provide the necessary infrastructural links to support the National Spatial Strategy.’* The proposed project will help to achieve this action.

Chapter 3 of the document sets out the government vision and high level targets, among those listed and which will also be achieved by the M28 project include:-

- The present levels of traffic congestion and travel times will be significantly reduced;
- The transport system will enhance Ireland’s economic competitiveness; and
- Health risks and the incidents of accidents and fatalities will be reduced.

Among the key goals which form the basis of the policy, the Government aims to improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks.

Chapter 4 of the strategy notes that *‘the efficient movement of goods is vital to our competitiveness and economic welfare. 65% of our GDP is based on the export of goods and services and that, at present, 95% of all goods are moved by road and over 30% of transport greenhouse gas emissions are from the freight sector’*. With this in mind, one of the stated actions in the policy is to set a target aimed at reducing the environmental impact of freight transport while at the same time improving efficiency in the movement of goods and promoting economic competitiveness.

The proposed road project, provides much improved access to the port in Ringaskiddy and the efficient movement of goods, alleviates congestion in the area, makes the existing N28 available as a potential cycle route to the port, increases road safety by the provision of a modern high quality road and generally increases transport efficiency. As such, it is consistent with the policy actions outlined in *‘Smarter Travel, A New Transport Policy for Ireland, 2009 - 2020’*.

2.1.9 National Roads Authority Service Area Policy, TII 2014

The National Roads Authority (now Transport Infrastructure Ireland (TII)) published the *“NRA Service Area Policy”* in August 2014, which sets out the basis on which on- line service areas will be provided to meet the needs of road users on the national road network in Ireland. The TII’s policy for the M28 Cork to Ringaskiddy Road Project is as follows:

‘A Type 1 Service Area is proposed for the N28 from Cork to Ringaskiddy. Cork County Council, in consultation with the Authority, will include consideration of the appropriate location of this service area as part of the scheme planning, currently underway.’

2.2 PLANNING POLICY

2.2.1 National Development Plan, 2007 - 2013

The National Development Plan 2007-2013 identified the national need to upgrade the N28 road, in order to improve accessibility and connectivity between the port at Ringaskiddy and the national roads network. The National Development Plan 2007-2013 specifically mentioned the upgrading of N28 road access to the port at Ringaskiddy and its associated industrial zone as being a key development and investment priority for the Cork Gateway. In the period since, there has been significant development in Ringaskiddy and Carrigaline, including the expansion of the pharmaceutical industry within this area and the development of IMERC. Planning permission has also been obtained for the expansion of the port at Ringaskiddy which will allow for the relocation of

the port. Significant growth has also taken place in the residential sections within the Carrigaline and Rochestown areas. Therefore, the need for the M28 has become even more critical within the intervening period since the initiation of this policy at a national level. The M28 Road Project will facilitate the reduction of transport costs through shorter journey times and is considered to be vital in order to improve competitiveness in the production and export of goods.

2.2.2 Building on Recovery: Infrastructure and Capital Investment, DPER 2016-2021

The National Capital Investment Programme published by the Department of Public Expenditure and Reform (DPER) sets out the Government's framework for infrastructure investment going forward and continues on from its predecessor entitled *Infrastructure and Capital investment 2012-2016: Medium Exchequer Framework* which among one of its priorities was *'Targeting the improvement of specific road segments where there is a clear economic justification...'*

The predecessor document also expressed the belief that *'economic recovery in Ireland will be enterprise-driven and export-led'*. Section 3.2 of the 2012-2016 document states *'The National Road Network... is a crucial component of the economy's export potential and carries goods to airports and ports for onwards delivery to global markets'*.

This framework for the period 2016-2021 makes provisions for the proposed road development. It notes a number of schemes, targeted at removing bottlenecks, will also commence subject to planning permission. The M28 Cork to Ringaskiddy Project is listed amongst these schemes.

The framework recognises the economic importance of the countries ports and airports.

It also acknowledges that the Government is committed to the further development of the Irish Maritime Energy Resource Cluster (IMERC) in Cork, which supports jobs and urban renewal and regeneration in the area.

As such, the proposed road project, which will serve the industries in Ringaskiddy including the Port of Cork, has a clear economic justification and is therefore consistent with the *'Infrastructure and Capital Investment 2012 - 2016'* and *'Building on Recovery: Infrastructure and Capital Investment 2016 - 2021'*.

2.2.3 National Spatial Strategy for Ireland, DoELG 2002-2020

The Department of the Environment and Local Government published the National Spatial Strategy for Ireland (NSS) in 2002. The NSS seeks to achieve a spatial balance by developing the growth potential of areas. The NSS proposes that the national spatial structure be supported by a national transport framework, providing an improved network of roads and public transport services, enhancing access and connections throughout the country. This framework will be internationally connected through key points such as airports and ports with links to Northern Ireland, the UK, EU and the broader global economy.

The National Spatial Strategy identifies Strategic Radial Corridors as part of a National Transport Framework to support balanced regional development. The NSS identifies a Strategic Radial Corridor between Cork and Dublin and recognises Cork as an International access point via air and sea. The Strategy acknowledges that for Ireland to be globally competitive it needs effective communications to sea ports and associated shipping services.

2.2.4 Towards a National Planning Framework: Ireland 2040 Our Plan - Issues and Choices, DHPCLG February 2017

A new 20 year National Planning Framework (NPF) is being prepared for Ireland which will replace the NSS. As part of this process the Department of Housing, Planning, Community and Local Government (DHPCLG) have prepared an 'Issues and Choices' paper which provides an overview of some of the main national planning issues that affect Ireland and invited submissions in order to inform the draft National Planning Framework which is due to be published in Q4 of 2017.

Cork County and City Council have prepared a joint submission to the NPF entitled "*Cork 2050 Realising the Full Potential (March 2017)*". This document sets out various strategies for the comprehensive and evidence based approach to the future development of Cork. The Transport Strategy recognises the need for the M28 to connect Ringaskiddy Port to the N40 as being of National importance.

The NPF will be a statement of the Government's objectives for Ireland's spatial development and it will form the top tier of Ireland's planning policy hierarchy. It will build on the strengths of the former NSS while at the same time addressing newer challenges in relation to the need for greater emphasis on environmental matters such as climate change and sustainability, as informed by European Union legislative requirements that have been introduced since the NSS was published.

The NPF Issues and Choices Paper acknowledges Ireland's position as an island nation on the western periphery of Europe². It notes that National Ports Policy has resulted in tiering Ireland's ports and that as a result transport infrastructure has and is developing well in Ireland's three 'Tier 1' ports. The paper states that *'Dublin, Cork and Shannon Foynes development plans, with related road and rail infrastructure upgrades, provide evidence of the progress being made.'*(Section 4.5.14) It further notes that *positive trends have been reported across a number of key sectors such as seafood exports, shipping and tourism in marine and coastal areas. The total volume of traffic moving through Irish ports recorded a 7 percent increase in 2015, the highest level recorded since the beginning of the economic crisis.* (Section 4.5.13). This further highlights the need for the proposed M28 Road Project.

One of the potential themes identified for the NPF is to deal with identifying infrastructural priorities. It acknowledges that the co-ordination of infrastructure and the wider economic and community development strategies are essential to positioning strategic locations as drivers of wider regional development. It states that reference will be made to sectoral investment strategies including, for example, the SFILT and the National Ports Policy.

² Section 4.5.1

2.2.5 Our Sustainable Future: A Framework for Sustainable Development, DoECLG 2012 - 2020

Our Sustainable Future sets out a medium to long-term framework for advancing sustainable development and the green economy in Ireland which was prepared by the Ireland Department of the Environment, Community and Local Government.

Section 2.6 of the document is concerned with sustainable transport and states that ‘*sustainable transport is central to national efforts to combat climate change, air pollution and other negative environmental and social impacts*’ and notes that increasing congestion and lengthened journey times are the main pollution problems associated with transport in Ireland. Section 2.6 of the document also sets out that action is being taken on delivering ambitious goals for 2020, which include:-

‘Improving the planning system so that future population and employment growth will have to predominantly take place in sustainable compact urban areas or rural areas which discourage dispersed development and long commuting; Reducing car travel, and particularly work related commuting by car by encouraging modal shift to walking, cycling, and public transport, where possible’.

The proposed road supports the policy of enhancing the sustainability of transport in Ireland as it:-

- Will reduce congestion and journey times along the N28 route.
- Improves access and transport efficiency to the Ringaskiddy area for all users, particularly for key industry and employment transport.
- Will remove traffic from the existing N28, thereby facilitating the use of the existing N28 for sustainable transport models including cyclists and pedestrians for people living, working and studying in the area (See **Figure 1.4 in Volume 5** of this EIS which provides an overview of how the M28 project ties in with existing and proposed sustainable travel within the area).

2.2.6 Regional Planning Guidelines for the South West Region 2010 – 2022

The Regional Planning Guidelines (RPGs) for the South West Region 2010 – 2022 support development of strategic roads including the N28 which serves the Port of Cork facilities at Ringaskiddy and Ringaskiddy as a strategic employment location. It specifically mentions:-

- The N28 servicing the major industrial developments at Ringaskiddy as a major piece of road infrastructures required to be delivered. (Section 1.3.26).
- *‘The Port of Cork is a key element of the regional economy and infrastructure and offers a wide range of shipping services to worldwide destinations. ... The rail network serving Cork does not provide an adequate means of collection/distribution of freight to the region and so **future port facilities need to be well served by the road network.**’* (emphasis added) (Section 1.3.33).
- Significant employment growth is envisaged at Ringaskiddy as a principal location for new industrial employment. The Plan notes that Ringaskiddy will continue to act as a strategic employment location and should see primarily industrial employment growth based on the relocation of port activity from Docklands(p. 34)

- One of the key principles underpinning the regional vision statement is the need to ‘*Deliver an integrated and cost effective transportation and infrastructure system ...throughout the region in a sustainable manner*’. (Section 2.1.2).
- ‘*Recent studies undertaken by the Port of Cork regarding the potential of rail/road services for port activities have indicated that, with the exception of a limited need for niche cargos in appropriate locations, the existing rail network from Cork Harbour does not adequately support the collection/distribution of freight to/and from the port. The predominant existing and likely future mode of freight transport for port activities is by road.*’ (emphasis added) (Section 5.5.10).
- Cork Harbour is described as being important for economic and environmental reasons. As the largest port in Ireland outside of Dublin, it makes a strong contribution to the overall economic wellbeing of the South West Region, particularly in the manufacturing, commercial, industrial and tourism sectors. (Section 5.5.6)
- Cork Harbour is described as being of both national and regional significance as it contains the regional significant pharmachem industries at Ringaskiddy. (Section 3.3.12)

The proposed road project will help facilitate the relocation of the Port of Cork to Ringaskiddy which has recently been approved by An Bord Pleanála as it will increase road capacity to cater for the ports expansion of facilities in line with the RPGs. It will also service existing industries and future expansion of industry and employment within the area which is identified by the RPGs as being of both national and regional significance.

A detailed review of the proposed M28 Road Project in relation to these guidelines is provided in **Appendix 2A** in **Volume 4** of this EIS.

2.2.7 Cork Area Strategic Plan (CASP): Strategy of Additional Economic and Population Growth Update, 2008

The N28 is identified as a Major Transport Infrastructure Proposal and is described as the Port Access Route to improve access to the proposed new port facilities including a container terminal at Ringaskiddy (Exec Summary).

The Strategy acknowledges that the Port of Cork is heavily reliant on HGVs and is thus strategically reliant on the provision of a high quality national road network noting the particular importance of the implementation of the N28 (P.117).

The CASP update considers the N28 Ringaskiddy Port Access Route ‘*to be critical and essential to the growth and development of the CASP region and the achievement of the CASP goals*’ (p. 117).

The M28 project is listed as a CASP infrastructure priority in line with NDP policy (p.148).

Significant employment growth is envisaged at Ringaskiddy as a principal location for new industrial employment. The Plan notes that Ringaskiddy will continue to act as a strategic employment location and should see industrial employment growth based on the relocation of port activity from Docklands (p. 34).

In referring to Ringaskiddy as a Strategic Employment Area the Plan notes that the development of Ringaskiddy will require the provision of a high quality green route (p. 50). The proposed project will reduce traffic levels on the existing N28, thereby facilitating an opportunity for sustainable transport models including cyclists and pedestrians and potentially opening up the opportunity to develop this route as a green route.

A detailed review of the proposed M28 Road Project in relation to CASP is provided in **Appendix 2A** in **Volume 4** of this EIS.

2.2.8 Cork County Development Plan 2009-2015

The Cork County Development Plan (CDP) 2009-2015 has been superseded by the Cork CDP 2014-2020. However, this earlier plan actively supported development of the road infrastructure and wider national and regional proposals.

Policy INF 3-3 specifically provided support for the TII (NRA's) targets for the road network, which included the M28 Cork to Ringaskiddy Project.

2.2.9 Cork County Development Plan 2014-2020

The Cork County Development Plan 2014 - 2020 (hereafter referred to as the CDP) is the key planning policy document for the Cork County area in which the project is located. There is strong and wide ranging support in the CDP for the upgrade of the N28 to ensure expansion of Port facilities at Ringaskiddy.

Ringaskiddy peninsula is identified as one of four 'strategic employment centres' in the county and a principal location within the employment hierarchy. (Table 6.1) The CDP acknowledges that '*In employment terms, the Cork region has a number of employment locations that have underpinned Cork's economic success. These include, for example; the port related, pharmaceutical and associated industries at Ringaskiddy;*' (Section: 6.2.2)

The CDP states that '*Cork Harbour is the most significant port in the state, outside Dublin, and has an important role in the continuing success of the marine – leisure, recreation and tourism sectors in the South West Region*'. (Section 4.9.2) CDP Objective EE 6-2 which refers to Cork Harbour provides '*Support of the upgrade of the N28 to accommodate the expansion of Ringaskiddy Port.*'

The proposed road project is identified in the CDP as critical infrastructure required for the following:-

- At project stage of the Shannon Park Masterplan which makes provision for a significant expansion of housing to the north of Carrigaline (Table 15.1).
- To be in place on commencement of development of the Ports primary location for future port development and port uses displaced from Cork City Centre development areas (e.g. Docklands) Large scale technology based manufacturing e.g. (pharmaceutical Research and employment linkages with National Maritime College of Ireland (Table 15.1).
- Short term objective required to serve Cork Gateway/County Metropolitan Cork Strategic Planning Area (Table 15.2).

Objective TM 3-1 of the CDP which relates to the National Road Network seeks the following:-

- a) *Support of the National Roads Authority in the implementation of the N28 (Cork – Ringaskiddy) as a major project which is critical to the delivery of Planned Development.*
- b) *Support and provide for improvements to the national road network, including reserving corridors for proposed routes, free of inappropriate Development, so as not to compromise future road schemes.*
- f) *Consider the most up to date guidance in relation to the provision of Service and Rest Areas on the National Road Network (Section 2.8 of the Department of the Environment Community Heritage and Local Government ‘Spatial Planning and National Roads Guidelines’ (2012) and ‘NRA Service Area Policy’ (August 2014).*
- g) *Cooperate with the National Roads Authority to identify the need for Service areas and/or rest areas for motorists along the national road network and to assist in the implementation of suitable proposals for provision, subject to normal planning considerations.*
- h) *Ensure that in the design of new development adjoining or near National Roads, account is taken of the need to include measures that will serve to protect the development from the adverse effects of traffic noise for the design life of the development.*

CDP Objective TM 5-2 which refers to Cork and Other Ports provides general support for appropriate road transport capacity to facilitate strategic port facilities at Ringaskiddy, the relocation of the port to Ringaskiddy and support the ports role in facilitating industry, defence, trade, marine leisure and other economic sectors. This objective supports the need for the M28 Road Project.

CDP Objective TM 6-1 which relates to Water Based Transport seeks to ensure appropriate access (road and rail) to Cork Port, recognising its role in the provision of maritime transport, both passenger and freight which supports the need for the M28 Road Project.

The ‘Preferred Route Selected - N28’ is identified in Figure 10.2 and in Volume 4 of the CDP Map Browser as a route protection corridor. According to the CDP the Council, in consultation with the National Roads Authority, will protect proposed national road route corridors where the route selection process has been completed/approved and where preferred route corridors have been identified. Objective TM 3-1 as outlined above provides protection to such routes. The N28 route protection corridor within the CDP is based on the historic route which was prepared in 2008. This route has since changed and is reflected in the draft Ballincollig – Carrigaline Municipal District Local Area Plan 2016.

A detailed review of the proposed road project in relation to this plan is provided in **Appendix 2A in Volume 4** of this EIS.

2.2.10 Cork City Development Plan 2015 – 2021

The Cork City Development Plan (hereafter referred to as the City Plan) places increased emphasis on the renewal and development of the City Centre as the employment, social and cultural heart of the city and the region. In doing so it supports the gradual expansion of the City Centre eastwards through the creation of sustainable neighbourhoods into the Docklands area (including Tivoli) which is currently occupied by the Port of Cork.

Section 13.94 of the City Plan which identifies the *'The relocation of the Port and SEVESO site'* as a critical step that needs to be undertaken to facilitate and encourage the redevelopment of Docklands.

The City Plan identifies the *'N28 Cork Ringaskiddy route upgrading'* as one of the *'key strategic road priorities for the city'* (Section 5.30). Furthermore, the *'N28 Cork Ringaskiddy route upgrading'* is identified as a strategic road infrastructure objective of the City Plan under Objective 5.18.

The City Plan identifies the redevelopment of the North and South Docks as a major new mixed use quarter and as the most significant sustainable development opportunity for the City Region. The overall strategy for Docklands is set out in Chapter 13 and the *South Docks Local Area Plan 2008 – 2018* (SDLAP) contains the detailed planning strategy for the South Docks area. The City Plan states that the *'delivery of Docklands development is critical to the city achieving its population and employment targets and to the implementation of the CASP update strategy as a whole'* (Section 2.2.3).

Section 13.79 of the City Plan acknowledges the importance of the development of the South Docks and its dependence on the relocation of the Port of Cork. It states: *'With appropriate investment, the South Docks area is capable of supporting a large residential and working population, however the achievement of this will be dependent on the relocation of the Port of Cork.'*

The City Plan intends to prepare a new Local Area Plan for the redevelopment of the Tivoli Docklands area as a new residential quarter with complementary employment uses. Section 2.27 of the City Plan states that the *'planned relocation of the Port of Cork container operations from Tivoli creates the potential to consider the future development of this area for alternative more intensive uses'*. It states that *'it will be important to ensure that the mix of uses and timing of development of Tivoli does not take away from the potential of the City Centre and North and South Docklands for economic development and employment generating uses.'* A Local Area Plan will be prepared in co-operation with key stakeholders including the Port of Cork to determine the appropriate mix of uses, access and extent and timing of development. The City Plan states that *'The timing of the preparation of a local area plan will be linked to the need to prepare for the relocation and to facilitate lands becoming available for redevelopment.'* (Section 2.27).

Therefore, it is clear that the relocation of the Port from Cork is critical in achieving the City's housing and employment targets. The M28 will provide a key piece of infrastructure to facilitate the relocation of Port of Cork to Ringaskiddy.

2.2.11 Carrigaline Electoral Area Local Area Plan 2011 (As Amended)

The Carrigaline Electoral Area Local Area Plan (LAP) 2011 (as amended in 2015 – 2nd Edition) provides wide ranging support for the M28 Road Project as follows:-

- Section 4.3.3 of the Plan acknowledges that *'The N28 is a critical piece of infrastructure which needs to be upgraded. The current road is a sub-standard single-carriageway. Failure to upgrade the N28 to dual carriageway will have severe competitive and economic implications for both the Metropolitan Cork area and the region as a whole.'*
- *'The upgrading of the N28 is essential to the future development of the Carrigaline Electoral Area.'* (p.16).

- The improved road will have a greater capacity particularly for freight vehicles making journeys to and from the port and this will substantially improve the standard of the existing N28. It is critical that the N28 project be finalised as quickly as possible in order to bring certainty and assurance of commitment to existing and future investment in the Ringaskiddy area. This planned upgrade represents an important catalyst for the economic development of Cork and the South-West region. (Section: 4.2.19 and 2.2.55).
- Section 4.1.2 of the plan acknowledges that *‘There are advanced proposals to upgrade the N28 to motorway standards.’*

The proposed alignment of the N28 at the time of preparation of this plan is set out in the Carrigaline zoning map on page 31 and under Objective U-02 in the Ringaskiddy map on page 74. The reservation corridor identified within the LAP was based on the proposed road alignment at the time of preparation of this plan. The proposed M28 road alignment has been updated since then and it identified in the draft Ballincollig – Carrigaline MDLAP 2016 which is due for adoption by August 2017.

A detailed review of the proposed road project in relation to this plan is provided in **Appendix 2A** in **Volume 4** of this EIS.

The LAP also refers to the proposed upgrade as being of ‘motorway standard’.

2.2.12 Draft Ballincollig Carrigaline Municipal District Local Area Plan November 2016

Cork County Council recently published the draft Ballincollig-Carrigaline Municipal District Local Area Plan which will replace the Carrigaline Electoral Area LAP 2011 on adoption in August 2017.

The draft LAP supports the proposed road development as an important catalyst for the economic development of Cork and the South West region. It further states that it *‘is critical that the M28 project be finalised as quickly as possible in order to bring certainty and assurance of commitment to existing and future investment in the Ringaskiddy area.’* (Section 3.7.37).

The draft LAP proposes to facilitate the proposed road development and protect the route corridor from inappropriate development and provides an indicative alignment of the roadway within the Ringaskiddy area. (Objective RY - GO - 04).

A detailed review of the proposed road project in relation to this consultation document including the proposed changes to the LAP is provided in **Appendix 2A** in Volume 4 of this EIS.

2.3 CONCLUSION

In terms of national transport policy, the proposed road project will form part of the core network under the ‘Trans European Network-Transport (TEN-T)’. The upgrading of national primary route forms a major component of upgrading the transport network to ports of national significance (Tier 1) as defined under Section 2.5 the ‘National Ports Policy’. The ‘Department of Transport’s Statement of Strategy’ further includes an overarching policy to support the National Port’s Policy which is in line with the proposed road project.

The M28 is in line with the ‘Strategic Investment Framework for Land Transport’ which establishes investment in land transport as a high level priority and the need to support exporting sectors including port facilities.

The proposed road project provides a strategic transport link between one of the main ports in the country providing access to all regions which is outlined as a key principle of the ‘Spatial Planning and National Roads Guidelines’.

The proposed road project in providing much improved access to the Port of Cork in Ringaskiddy will open up access to a key seaport and to a large scale employment zone. The proposed road project will facilitate a reduction in urban congestion by removing specific bottlenecks on the existing N28.

The reclassification of the existing N28 will facilitate the introduction of a specific N28 Sustainable Travel Strategy. As a result this will open up opportunities to promote and support multi modal travel including a mobility management approach to new developments in the area. This will also include the provision of enhanced public transport and the provision of improved active mode facilities including increased walking and cycling within the area. This approach is consistent with the policies actions outlined in ‘Smarter Travel, A New Transport Policy for Ireland, 2009 - 2020’ and will have the effect of future proofing the proposed M28 Road Project.

The proposed road development has been fully supported within national, regional and local level planning policy documents for a number of years.

Specifically, at the national level, it has been included in the National Development Plan (NDP) 2007-2013, which states that *‘over the period of the plan key development and investment priorities for Cork and its wider environs included the need for the upgrading of the N28 road access to Ringaskiddy Port and its associated industrial zone.’*

The NDP framework including the ‘Infrastructure and Capital Investment programmes from 2012-2016 and 2016-2021 also make provision for the upgrading of the N28 in order to improve accessibility and connectivity between the Port and the national road network. In line with the ‘National Spatial Strategy’, the road project will provide an effective means of communications to sea ports and associated shipping services supporting Ireland to be globally competitive.

At the regional level, the South West Regional Planning Guidelines in 2010 identified that ‘integral to both the expansion of the Port of Cork and the planned redevelopment of the City Docklands is the relocation of port activities and related uses from the City Docklands and Tivoli to new sustainable locations in the harbour’, supported by improved transport networks.

The CASP Update 2008 identifies the upgrading of the N28 road access to Ringaskiddy Port and its associated industrial zone as key development priorities for the Cork Gateway as identified in the NDP 2007-2013. The plan proposes that the upgrading of the N28 be included in Tranche 2 (2008-2013) of the plans phasing as it is critical and essential to the growth and development of the CASP region and the achievement of the CASP goals. The plan also supports the creation of an Integrated Transport System which would include the development of an integrated rapid transit network including the upgrade of the N28.

The CASP update highlights the fact that the Port of Cork and Cork Airport are two major economic factors in the CASP region and their efficient operation at a strategic level is based on their accessibility and connectivity with the wider region, primarily though not exclusively by the national roads network. The Port of Cork relies heavily on HGV traffic to deliver and distribute goods by the national roads network and is thus strategically reliant on the provision of a high quality national road network in the CASP area. The proposed M28 Road Project will help improve connectivity for distribution of goods and make the area more attractive to investors.

The Cork CDP 2014-2020 supports development of the road infrastructure and wider national and regional proposals. Policy TM 3-1 specifically supports the TII/NRAs targets for the road network which includes the N28 as a project critical to the delivery of planned development within the County.

Figure 2.2: Route Protection Corridors in Cork County



The Cork City Development Plan identifies the redevelopment of the North and South Docklands within the City as the most significant sustainable development opportunity for the City Region and is critical to the City in achieving its population and employment targets. The achievement of this objective is dependent on the relocation of the Port of Cork to Ringaskiddy and the delivery of the M28 Road Project.

At the local level, the Carrigaline Electoral Area Local Area Plan 2015 (LAP) recognises the importance of the N28 National Primary route linking Ringaskiddy to Cork City and onwards to the wider region and its existing problems with traffic congestion and public transport connectivity.

The Carrigaline Electoral Area LAP 2011 mentions the proposals in the NDP and CASP to improve the existing N28 between the Bloomfield interchange with the N40 South Ring Road and Ringaskiddy. It states that the improved road will have a greater capacity particularly for freight vehicles making journeys to and from the port and this will substantially improve the standard of the roadway.

The Carrigaline Electoral Area LAP 2011 states that *'it is critical that the N28 project be finalised as quickly as possible in order to bring certainty and assurance of commitment to existing and future investment in the Ringaskiddy area'*.

In the Draft Ballincollig-Carrigaline Local Area Plan 2016, a revised route corridor which is in line with current proposals has been identified in objective RY-U-02. Further support for the proposed road project is detailed in Section 3.7.37 of the Draft Local Area Plan.