



An
Coimisiún
Pleanála

Memorandum ABP-318309-23

To: David Ryan
From: Emmet Smyth
**Re: Further Information regarding Royal Canal Greenway Phase 4
between Cross Guns Bridge Phibsborough and Ashtown, Dublin 15**
Date: 12th March 2026

Proposed Development:

Phase 4 of the Royal Canal Greenway between Cross Guns Bridge, Phibsborough, Dublin 7 and Ashtown, Dublin 15 comprises c.4.2km of cycle and pedestrian route. This proposal entails the amendment of an approved Part 8 application (reference 2870/15) seeking the following.

The widening of the existing towpath by realigning the Northern bank of the canal at the following three locations to remove the need for 3rd Party land acquisition along with associated works and ancillary services.

- West of Lock 6 for approximately 600 metres realigning by a maximum of 2.15 metres.
- West of Broombridge for approximately 345 metres realigning by a maximum of 1.4 metres.
- West of Lock 8 for approximately 85 metres realigning by a maximum of 1.75 metres.

- Inclusive in the works it is proposed to include ducting and associated chambers to ESB standard along the proposed Royal canal Greenway project.

The proposal for the greenway path will be up to 4.8m in width, and this will extend to 5.5 metres at the Coke oven cottages. This proposed path will be 1.03km in length. Works will include the dredging of the canal along the realignment route.

The following construction methods are to be utilised during the proposed construction.

- Surplus silt will be dredged from the canal down to the original lining using track machines. It is reported that this will most likely be done by dewatering the canal and dredging in the dry in particular where there is potential or known risk of dredging contaminated materials.
- Dewatering is to be carried out by the construction of temporary watertight dams or by opening the locks at the downstream end where possible and in areas where a dewatered section is not bound by a downstream lock the canal will need to be dewatered by pumping.
- The towpath construction will require site clearance, removal of existing plant and sod material, the excavation of the existing pavement and base layers including the topsoil. The construction and installation of ducting to ESB standards, deposit and compact fill layers, kerb laying, lighting CCTV and reinstate sod and plant.

The Board issued a request to the applicant to address a number of issues to facilitate them in their consideration of the matter under article 120(3)e of the Planning & Development Regulations, 2001 as amended. The issues relevant to this memorandum are those regarding the treatment of the canal sediments.

The Board requested the following.

You are requested to submit further information in relation to the canal sediment that you propose to remove. Specifically you should clarify the extent and level of

contamination within the canal sediment (in that regard the board notes the submission from the applicant received by An Bord Pleanála on the 18th October 2023 including inter alia, the document titled ('Royal Canal Level 6 Sediment Sampling Methodology and results April/May/July 2013- Waterways Ireland 2013'), mitigation measures to be employed during the removal of the sediment and proposals for its final disposal. This information is required to assist the Board in determining whether there is a real likelihood of significant effects on the environment from the removal and disposal of the canal sediment, with particular regard to water quality, biodiversity, ecology human health and designated European sites downstream from the works.

On the 27th of May 2025, the applicant responded to the above request. The further information response was subdivided into 2 No. subgroups and a summary to finish. These are as follows.

Sediment Removal and extent of contamination.

In summary the applicant responded as follows. Dredging of the canal was requested by waterways Ireland to coincide with the proposed instream works citing overdue maintenance dredging. The applicant refers to the extent and level of contamination in the canal sediments citing sediment testing undertaken by Aquafact in February of 2020. In total 10 sediment samples were taken with 7 of these corresponding to the proposed locations of the dredging. Dredging works are to be carried out along the portion of the canal where reconfiguration works are to be carried out. Table 1 outlines the areas that were samples were taken starting with 2 samples taken over a 600m length of the canal between lock 6 and the Coke Oven Cottages. 4 samples taken West of Broombridge over 345 metres of the canal and 1 taken West of Lock 8 over an 85-metre stretch of the canal. Each sample location referenced as RC1 to RC8.

The dredging entails removing a depth of 100mm above existing cill level (the upstream level of the downstream dock chamber). Utilising this information the

applicant has been able to calculate the volume of material to be excavated which is c.6,050m³.

The applicant refers to table 2 as a presentation of the results of the chemical testing undertaken by Aquafact and whether each chemical parameter was exceeded. Exceedances are recorded at locations RC1, RC2, RC3 and RC8. RC1-RC3 recording exceedances against the parameter PAH (including Cresosote) and RC8 showing that the sample would exceed the Waste Acceptance Criteria.

The applicant further states that given the sediment sampling that the full 600m at Lock 6 to the Coke Oven Cottages and the 85m section of the canal is 'potentially contaminated' with only a 'local' section of the canal sediment West of Broombridge likely to be classified as contaminated.

Comment:

The question to be answered here is has the applicant clarified the extent and level of the contamination in the Canal sediments. Table 1 has omitted RC3 sediment sampling location, so it is not clear where this sediment sample was taken was it on the section between Lock 6 to the Coke Oven Cottages or West of Broombridge. This error/omission does not lend itself to a clear representation of the locations of the sediment samples.

The canal is classified as being of 'good status' with the risk status under review. The report submitted under further information still references a sampling programme that assessed for a variety of parameters, with contamination being indicated. The precise details of same were not included in the report submitted under further information. The applicant's submission included a sediment sampling programme indicating significant hydrocarbon contamination, such as Poly-aromatic Hydrocarbons and creosote, reference table 2.

Table 2 provides an indicative summary of the types of contamination found in the sediments at each of the sampling locations RC1 to RC 8 but does not demonstrate

the level of contamination within the sediment samples. Furthermore, it is my opinion that regarding the extent of the contamination of the canal sediments this has not been clearly demonstrated by the applicant. Two sediment samples have been taken over a section of 600 metres of canal, and this would appear to be based on two sediment samples according to table 1 of Section 1.1 of the further information submitted. This has led the applicant to state that this full section is 'potentially contaminated,' the same is the case for the 85m length of the canal West of Lock 8. In addition to this the applicant further states that only a local section of the canal West of Broombridge 'likely to be contaminated.' Consequently, it is my opinion that the applicant has not given any further clarity to the levels or any accuracy as to the extent of the contamination within the canal sediments. The applicant has clearly shown how the volumes of the sediments to be removed has been established.

Avoidance and Mitigation measures.

In summary the applicant responded as follows. The applicant states that during planning for all in-stream works that agreement with Waterways Ireland and Inland fisheries will be required when ascertaining pollution prevention measures. Reference is made to the establishment and implementation of an Environmental Operating Plan which would include site specific statements for all activities where there is the likelihood of environmental impact. The applicant goes on to further develop the point stating avoidance and mitigation measures will include best practice and standard mitigation to protect waters and direct disturbance impacts. The Environmental Operating Plan will be equivalent to the TII guidelines for Creation, Implementation and Maintenance of an Environmental Operating Plan.

The applicant states that to minimise downstream impacts that dredging to be carried out in the dry utilising a temporary dam to prevent pollutant migration downstream to other receiving surface waters. Electrofishing to be completed prior to the dewatering of the canal. Waterways Ireland will deem that the dewatering is complete prior to the positioning of a temporary dam. The proposal is to remove the silt to the bed of the

canal at the location of the dam prior to its installation. A flume will be installed to allow for continued flow of waters within the canal, which will be sealed to the dam with sandbags and voids filled using puddle clay or similar. In the event of flows exceeding the flume capacity waters will be contained within the canal channel. Works will only commence once the area has adequately dried out. The applicant states that excavated material will be removed to an appropriately licenced facility they further reference the agreement of a Construction environmental Management Plan (CEMP) post consent. All excavation works on the canal's banks intended for reconfiguration will be carried out in the dry also. The applicant states that the methodology described aligns with the methods utilised by Waterways Ireland and that this would be considered standard practice.

Comment:

The applicant has essentially given a brief overview of the methodologies for this project based on the methods utilised by Waterways Ireland.

The primary pollutants that can be generated during the construction phase of the project would be noise, vibration, dust, water pollution from fuel spillage or sedimentation and the removal and handling of contaminated sediments. The majority of these potential pollutants could be alleviated via control & mitigation measures in a robust Construction Environmental Management Plan or Environmental Operating Plan as referenced and as such alleviate the likelihood of significant effects on the environment, we have not been privy to such a document and reference is made by the applicant to establishing such controls post consent.

Conclusion:

In summary I believe it is not possible to exclude significant impacts on waters given the works proposed and the lack of details regarding the degree and extent of the sediment contamination within the canal bed and the lack of details regarding mitigation and controls to be established post consent. The report submitted under

further information in my opinion has failed to address the full extent, nature, and degree of the contamination within the canal bed sediments with mitigation still being proposed post consent. In this regard I am not satisfied that the applicant has adequately addressed the concerns raised by An Bord Pleanála at that time.