**Our Case Number:** ACP-324711-26

An Coimisiún Pleanála

12th Lock Liveaboard Boaters group, Castleknock
c/o Alexander Mackay & Peter Sheekey
7 The Court
Mulhuddart Wood
Mulhuddart
D15YVN9

**Date:** 23 October 2026

**Re:** Proposed Development of the Royal Canal Urban Greenway along and adjacent to the Royal Canal towpath
from the Kildare County Council boundary to Talbot Bridge (Old Navan Road), County Dublin

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission (including your fee of €50) and oral hearing request in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

The Commission has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Commission will inform you on this matter in due course.

Please note that the proposed road development shall not be carried out unless the Commission has approved it or approved it with modifications.

If you have any queries in the meantime, please contact the undersigned officer of the Commission at laps@pleanala.ie.

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Muirin Gowen
Executive Officer
Direct Line: 01-8049323

HA02A


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|---|---|---|
| **Teil** | **Tel** | (01) 858 8100 |
| **Glao Áitiúil** | **LoCall** | 1800 275 175 |
| **Láithreán Gréasáin** | **Website** | www.pleanala.ie |
| **Ríomhphost** | **Email** | communications@pleanala.ie |

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

An Coimisiún Pleanála

## SID Online Observation

**Online Reference**
SID-OBS-006196

### Online Observation Details

| Contact Name | Lodgement Date | Case Number / Description |
|---|---|---|
| Alexander Mackay | 21/10/2026 11:36:22 | 324711 |

### Payment Details

| Payment Method | Cardholder Name | Payment Amount |
|---|---|---|
| Online Payment | Alexander Mackay | €50.00 |

### Fee Refund Requisition

**Please Arrange a Refund of Fee of**
€

**Lodgement No**
LDG—

**Reason for Refund**

**Documents Returned to Observer**
☐ Yes ☐ No

**Request Emailed to Senior Executive Officer for Approval**
☐ Yes ☐ No

**Signed**
EO

**Date**

### Finance Section

**Payment Reference**
ch_3USwscB1CW0EN5FC0hmnWUJs

**Checked Against Fee Income Online**
EO/AA (Accounts Section)

**Amount**
€

**Refund Date**

**Authorised By (1)**
SEO (Finance)

**Authorised By (2)**
Chief Officer/Director of Corporate Affairs/SAO/Board Member

**Date**

**Date**

**12th Lock Liveaboard Boaters group, Castleknock**

c/o:

Alexander Mackay (0876288327 / ajmackay30@hotmail.com )
&

Peter Sheekey (0851444076 / sheekeyp@tcd.ie )

**Note:** As a Liveaboard I don't have a permanent address, so email/phone are the preferred communication methods, however, any mail correspondence necessary can be sent to:

Alexander Mackay

7The Court,

Mulhuddart Wood,

Mulhuddart

D15YVN9

**Date: 20 October 2026**

**Re: Submission / Objection – Royal Canal Urban Greenway (Dublin 15), Deep Sinking (Castleknock Station to Coolmine) – Impacts on Residential Boat Community at Castleknock**

**Case number:** 324711

**Reference:** HC06F.324430

Dear An Coimisiún Pleanála,

We write as a **residential group representing the liveaboard boat community moored on the Royal Canal at/near Castleknock Train Station**, in the vicinity of the proposed Royal

Canal Urban Greenway works affecting the **Deep Sinking between Castleknock and Coolmine**.

We support the general aim of improving public amenity and safe active travel. However, we object to the proposal as currently presented because it fails to adequately address (a) the environmental sensitivity of the Deep Sinking, and (b) the practical and safety requirements of an established **residential community living on boats at the 12th Lock.** Without clear redesign and enforceable planning conditions, the project risks causing irreversible harm to a unique canal environment and undermining safe residential occupation of the canal during and after the proposed works.

We request that Fingal County Council **refuse permission** unless the issues set out below are fully resolved through binding conditions and/or revised design.

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**1) Essential vehicle access for pump-out at Castleknock Station jetty (or provision of pump-out facilities)**

Our community relies on **servicing access** at/near the Castleknock Station jetty so that **pump-out trucks** can reach boats to empty sewage holding tanks. This is a basic public health and environmental requirement.

If the greenway design or barriers prevent such access, it could:

- make lawful sewage management impractical
- increase the risk of improper disposal and canal pollution
- impose unreasonable burdens on residents and undermine residential use

**We request conditions requiring either:**

1. **Retention and formalisation of service vehicle and boat access** to the jetty/servicing point, **or**, if that cannot be delivered safely,
2. A binding requirement that **Waterways Ireland provide a permanent pump-out facility** at a practical location within reach of the Castleknock liveaboard moorings, delivered **before** any works remove or restrict pump-out vehicle access. **NOTE:** currently the nearest available Waterways Ireland pump out facility is in Mullingar, a 5 day round trip from Castleknock.

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**2) Engagement, notice periods, and relocation arrangements during construction**

Construction will inevitably affect residents through noise, safety zones, temporary closures, and potential restrictions on access to boats and navigation. We are concerned that there is currently no clarity on:

- whether and when boats will be required to move
- for how long any relocation would last
- where alternative moorings would be provided and what services/safety they will have
- the process for communicating changes and resolving issues

**We request conditions requiring:**

- a **Liveaboard Engagement Plan** (named contacts, meeting schedule, consultation prior to finalising construction phasing)
- a **Resident Relocation/Continuity Plan** if any temporary displacement is required, including minimum notice periods and guaranteed alternative safe moorings
- a works programme shared in advance, with timely updates and a complaints/escalation pathway

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**3) Environmental impact on a sensitive canal corridor ("Deep Sinking")**

The Deep Sinking is one of the most valuable and scenic nature stretches of the Royal Canal in Dublin 15. It functions as a linear wildlife corridor and refuge for swans, ducks, foxes, bats, herons, moor hens, squirrels, otters, cormorants, kingfishers and others. Works involving ground disturbance, surfacing, widening, vegetation clearance, lighting and increased usage levels may cause:

- loss of bankside habitat and mature vegetation
- disturbance to wildlife (including nesting birds) through noise, vibration, works duration and lighting
- bank erosion and sediment release during construction
- increased littering and pollution risk in the canal

**We request conditions requiring:**

- a robust ecological assessment (including seasonal constraints and invasive species management)

- strict limits on vegetation removal and bank disturbance; reinstatement with native planting
- avoidance of lighting in sensitive sections; where lighting is unavoidable it must be low-impact (shielded, low-level, warm temperature, curfew)
- a canal-protection construction methodology, including silt control, pollution prevention, and bank stability measures

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**4) Navigation continuity: boats must be able to pass and turn**

The canal must remain a functioning navigation. The design and construction phasing must ensure boats can:

- pass from one side of the Granard bridge area to the other
- access sufficient width/space to manoeuvre and turn where required as is currently the case

**We request conditions requiring:**

- confirmation (from the relevant navigation authority) that navigation clearances and manoeuvring/turning requirements are maintained
- any temporary closures to be minimised, time-limited, formally notified, and accompanied by workable alternatives

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**5) Increased anti-social behaviour and risks to public and residential safety**

This stretch is currently quiet. Increasing access and through-traffic can bring benefits, but experience from other greenway projects in Dublin shows it can often lead to:

- increased anti-social behaviour, intimidation and nuisance at night
- vandalism/theft and interference with boats, moorings and harassment/mugging of pedestrian or cyclist traffic
- higher conflict risk between fast-moving cyclists/e-scooters, people living/working on boats and pedestrians

As liveaboards, our boats are our homes. We cannot simply "lock up and leave" in the way a land-based amenity user can.

**We request conditions requiring:**

- a specific **community safety and management plan** covering anti-social behaviour prevention, reporting and enforcement
- Garda/community safety liaison and a clear operational management regime (waste management, signage, maintenance, emergency response)
- design measures to protect residential moorings from interference (e.g., appropriate separation, speeds/geometry, sightlines, and deterring congregation directly adjacent to homes and communities)

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**Conclusion / Request to Fingal County Council**

For the reasons above—environmental sensitivity, community safety, essential servicing access, lack of clear engagement/relocation planning, and navigation constraints—we request that Fingal County Council:

- **refuse permission** unless these matters are demonstrably resolved, and
- in the event permission is considered, attach **clear, enforceable conditions** addressing each point, including pump-out access/facilities and binding liveaboard engagement/relocation commitments.

We would welcome the opportunity to meet the project team and Fingal planning officials to ensure a solution that protects the Deep Sinking while respecting an established residential community.

Yours faithfully,

Alexander Mackay & Peter Sheekey

Signed on behalf of: **12th Lock Liveaboard Boaters group, Castleknock**