The Secretary

An Bord Pleanala

64 Marlborough St

Dublin 1

Date:24th April 2022

RE:

Agent	Angela O'Donoghue
Address for	17 Glendoher Close, Rathfarnham, Dublin 16
correspondence:	
-	
Development	SHD – www.edmondstownshd.com
Location	Whitechurch Road
Planning Authority	SDCC & DLRCC
`	
Reference Number	313059-22

Dear Sir.

We would like to make the following observation to the above scheme.

- The Applicant has submitted an application that is contrary to sustainable development, principles of proper planning and the SDCC Development Plan.
- The application has failed to submit a complete and accurate Statement of Consistency and Statement of Material Contravention
- The Applicant has failed to provide the necessary information for the Board to make an Appropriate Assessment of the application and the impact it will have in situ and ex situ of the site. The Board is obliged to take the precautionary principle when considering this application and to rely with scientific certainty on accurate and complete information. The Board has been placed in an impossible situation – they must refuse.
- It is noticeable that the Applicant has referred to surveys that he has not submitted and other surveys have been admitted to be incomplete for various reasons. It is not a fair procedure to be expected to comment on a proposal with documentation that is clearly not fit for purpose which ABP knew from the tripartite stage that such information was not fit for purpose and still allowed for it to proceed without any health warning or remedial action.
- There is no Social Audit, Road Safety Audit and details regarding their traffic assessment bear no relationship to what is the current reality of traffic/traffic movements in the receiving environment.
- Particular concern is the fact that Whitechurch Road is a school route with extremely narrow footpaths and no room for cycle lanes.

- In terms of an Architectural Response the design strategy for the site is a sub-optimal architectural solution for this site and does not adhere to the 12 principles within the Urban Design Manual, notably respect for context and how poorly the proposed development responds to its surroundings. The proposal also destroys any potential distinctiveness for the development by eroding the sylvan & rural character of Whitechurch Road and introducing an overbearing urban edge to Whitechurch Road.
- The traffic and transport surveys are inadequate and erroneous in fact and detail
- The suggestion by the Applicant that there will be improvements or enhanced public transport services is vague, unconfirmed and therefore unreliable and it is well documented that any planned additional capacity by BusConnects cannot accommodate the existing demand let alone for planning permissions recently granted planning permission by ABP. Operating on a wing and a prayer appears to be the approach taken by this Applicant as a means of public transport to serve this site. Wishful thinking is not the basis of sustainable development.
- The technical notes supplied by Martin Peters Associates (MPA) for previous SHDs in the area show the inadequacy of the Traffic and Transport assessment by other SHD applicants as well as this applicant as they fail to accept that there is no capacity in the road network or public transport to absorb this scale of development and there is no new public service provision that has been announced to date.
- ABP has received other MPA reports for other applications regarding Scholarstown SHD, Taylor's Lane SHD. Stocking Lane SHD and SHDs that egress onto Stocking Avenue which outline the pressure the local road network is currently facing. What has been confirmed is the granting of permissions by An Bord Pleanala for three SHDs on Stocking Avenue (White Pines East SHD, White Pines Central SHD and Ballycullen SHD, Stocking Lane SHD in addition to the Taylor's Lane SHD which are all to be serviced by the 15B with no further service increased announced. Luckily the Taylor's Lane SHD decision was reversed in the Judge Holland decision https://www.courts.ie/view/judgments/9b3ee329-4e04-48f1-b055-e1e6654dcf23/75f16b1a-d2c8-4e46-b26b-2d96a8821bb2/2022_IEHC_7.pdf/pdf
- The subject site is not served by any public transport and the nearest bus stop to this development is 1.6km away and a good 20-25 minute walk. The bus routes concerned 61 161 116 and 15d have neither the frequency and/or capacity of these buses combined that could service this subject site.
- It is clear that this SHD will be car dependent in an environment where there are a number of SHDS already approved of and the location of the new HSE Primary Care Centre for the Ballyboden, Whitechurch, Rathfarnham and Knocklyon area is to be located on Edmondstown Road and yet none of the cumulative effects of this traffic impact on the receiving environment has been assessed. The Martin Peters Associates report for previous the aforementioned SHDs in clearly indicate that the local Junctions and local Roundabouts are at capacity or near capacity and that was before other SHDs had been given the green light.
- In addition, there is no scheduling or phasing plan of any of these other SHDs which ABP has granted permission for to date into the receiving environment.

- The EIA Report is of a very poor standard and remarkably fails quite spectacularly to address the impact this development will have on bats but if that wasn't bad enough, they have failed to address the issue of other protected species birds (kingfisher, merlin, red kites etc) and otters. Their desktop online research failed to reference the 2019 DCC Otter Survey which identifies the Owendoher at this very location which independently confirms the popularity of the Glin (Whitechurch River) and Owendoher as a habitat for otters. The documentation submitted clearly links this development to the Glin and yet the Developer in other sections appears to take a
- Clearly this site is an ecological corridor between two Natura 2000 sites and that the Glin River is important for foraging, nesting and feeding wildlife is part of a group significance and network that has not been fully assessed for birds and wildlife. This incomplete assessment is not an example of best practice or acting with scientific certainty. Clearly this site has a higher ecological value for bats, otters and other protected species etc than has been submitted by the Applicant.
- The applicant has submitted a bat report which states: "Given the potential sensitivity of the site for bats a series of bat surveys were previously conducted in 2019 and 2020 (Keeley (2019) and Keeley (2020)). The current survey (2021) built on these previous surveys and were completed to update the results of same and to see if any significant changes to the site had occurred from the perspective of bats" However neither the 2019 and 2020 surveys are included which is inappropriate omission by the applicant. Baseline data and the methodology used and dates of inspection/survey for the Bat Surveys that took place in 2019 and 2020 have not been submitted in full and in detail. The applicant t has admitted that the 2019 survey did not include all of the subject site just the northern lands and the 2020 survey by the authors own admission was incomplete. This is not a series of surveys whose results can be described 'with scientific certainty'
- This development appears to be contrary to European Law such as the European Habitats Directive, The EIA Directive, the Water Framework Directive and the Birds Directive
- The EU Habitats Directive ensures the protection of the otters, merlin, red kites, bats, kingfishers, to name but a few protected species but who crucially have been identified as being present in the subject site area and along the Glin River. This river corridor is a wildlife sanctuary and as such, must be protected as a matter of urgency. The presence of such protected species requires the Applicant to proceed on a precautionary principle and with scientific certainty and the applicant has displayed neither.

Commission notice "Managing Natura 2000 sites The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" Brussels, 21.11.2018 C(2018) 7621 final states at;

3.6.6 Considering suitable mitigation measures to avoid or reduce the impacts Page 51

For the competent authority to be able to decide if the mitigation measures are sufficient to remove any potential adverse effects of the plan or project on the site (and do not inadvertently cause other adverse effects on the species and habitat types in question), each mitigation measure must be described in detail, with an explanation based on scientific evidence of how it will eliminate or reduce the adverse impacts which have been identified. Information should also be provided of how, when and by whom they will be implemented,

and what arrangements will be put in place to monitor their effectiveness and take corrective measures if necessary. The need for definitive data at the time of authorization is also raised in case C-142/16, paragraphs 37-45.

The applicant has failed to assess the impact this development will have on the aforementioned protected species, the Glin as part of the Owendoher catchment (as a nursery for the Dodder Catchment) and Dublin Bay (Natura 2000 site). Therefore, as a domino effect there are no appropriate mitigation measures earmarked in the documentation for bats or otters etc. Ignoring the connectivity of this site with a Natura 2000 site and the plethora of protected species which will be impacted by this development and the impact of surface water/drainage on the Glin and Owendoher clearly shows that this Applicant does not understand the very basics of EU Law. This proposal with its inadequate AA and EIA Report does not comply with EU Habitats Directive and EIA Directive and therefore in the opinion of the European Commission it does not comply with EU Law.

This overbearing monotonous, ill thought-out design, oppressive in scale, massing, height and site cofiguration is completely out of character for a tree lined spectacled we with unique rural & natural heritage signifiers. Such apartments in such a densified site are really out of place in this locality and are contrary to the Ballyboden Village Area Masterplan where Natural Linkages are promoted and emphasised. It is clearly a 'copy and paste' block approach which might suit an afternoon of LEGO but hardly conducive to a sense of community and sense of place? Do we really have to accept such depressing architectural performance from this firm?

- The topography of the site is quite complex and should this development be sanctioned will
 have devastating impact on surrounding properties and the character and setting of the
 Protected Structures in the area.
- It is clear that Critical Cross Sections have been omitted and it would be negligent of An Bord Pleanala to grant permission in the absence of such critical cross sections.
- The removal of such an amount of earth to facilitate this overbearing proposal including an underground car park and its associated construction site footprint would have a devastating impact on the residential amenity of the area and the watercourse.
- The removal of trees onsite and particularly the destruction of the ancient hedgerow / rampart/boundary treatment is unacceptable and is contrary to the Development Plans
- The extensive canopy loss of mature native trees is also at odds with SDCC Tree Management Policy and contravenes the objectives and policies of SDCC Development Plan. More trees are needed to capture carbon and the protection of mature trees is imperative. New trees will not have equal value in terms of biodiversity, surface water flood management, carbon off-setting. It is clear that with a less intensive development and a more sensitive layout that more trees and hedgerow could be retained. No attempt has been made to do that by the Applicant and this contrary to SDCC's policies on Climate Action, Biodiversity, Hedgerow and Tree Objectives and Policies.
- Air and Noise quality will be compromised, thus impacting the health of communities living in the area.
- The public open space is below standard to what is available in surrounding areas no kick about space for example and no circular pedestrian paths.
- The assessment of creche provision in the area bears no correlation to the availability of childcare spaces in reality – this is a serious flaw.
- We have serious concerns about the applicant's assertion that the sewerage connection and the fresh water connection is sustainably deliverable and achievable
- Wayleave that traverses the subject site and the impact this development will have on its stability and sustainability.
- We are deeply concerned that the attenuation tanks are co-located in the same area for Public Open Space provision.

- The management and design of surface water provision onsite is inadequate.
- 'In general, all new developments will be required to incorporate Sustainable Urban Drainage Systems (SUDS). SUDS include devices such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakways and green roofs. In some exceptional cases and at the discretion of the Planning Authority, where it is demonstrated that SUDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort'.
 - The removal of so many trees and hedgerows/ditches is counter intuitive to the policies of having nature based solutions as a more sustainable approach to flood alleviation and management. Scholarstown Wood which is west of this development on Stocking Lane is known to flood and have surface water management problems which it did not have predevelopment. The Applicant has failed to mention the current flooding incidents on Stocking Lane and Scholarstown Road in its EIA Screening Report.
 - The Applicants AA Screening is fundamentally flawed. Should any contaminated water from the development site enter the river (via drains) etc, conceivably it could make its way downstream and end up in Dublin Bay via the Owendoher, River Dodder and the River Liffey.

The decision of the European Court of Justice in Case C-258/11 (Sweetman v An Bord Pleanála) states in relation to appropriate assessment:

"So far as concerns the assessment carried out under Article 6(3) of the Habitats Directive, it should be pointed out that it cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned (see, to this effect, Case C-404/09 Commission v Spain, paragraph 100 and the case-law cited). It is for the national court to establish whether the assessment of the implications for the site meets these requirements".

The assessment in this case is inconclusive and is not definitive. The applicant has failed to remove all reasonable scientific doubt as to the effects of the works proposed on the protected sites. The Owendoher & Glin Rivers are part of the River Dodder Catchment, connected hydrologically and ecologically to two NATURA 2000 sites. The Owendoher and Glin Rivers are important ecological features in the area. The ecology surveys associated with this development are incomplete and wholly inadequate and should not have been relied upon to conclude on ecological impact.

• Pathways via Ringsend Wastewater Treatment Plan

There is a pathway from the site via wastewater and surface flows to the Natura 2000 sites in Dublin Bay, via the Ringsend treatment plant and the River Dodder respectively. The Ringsend wastewater treatment plant (WwTP), when functional, treats and then discharges into Dublin Bay. The plant is designed to serve a population equivalent (PE) of 1.64 million, but is currently operating above its capacity at 1.9m PE. The proposed development will increase the excess loading on the Ringsend Wastewater Treatment Plant. The Ringsend WwTP and its outfall are outside but adjacent to the boundaries of the South Dublin Bay and North Dublin Bay SACs and within the vicinity of 2 additional SACs. Irish Water data details that untreated wastewater has overflowed into Dublin Bay from the Ringsend Wastewater Treatment Plant (WWTP) more than 100 times since the beginning of 2015, with more than 9 billion litres of untreated waste water discharged into the Liffey estuary from storm holding tanks at Ringsend WWTP, including:

storm holding tanks at Ringsend WWTP, including:	
□ 2.8 billion litres discharged on 30 occasions in 2015	
☐ 3.1 billion litres discharged on 35 occasions in 2016	
☐ 1.2 billion litres discharged on 14 occasions in 2017	
☐ 2 billion litres discharged on 18 occasions in 2018	
□ 320 million litres discharged on seven occasions in 20	1

The proposal will increase loading on the WwTP, leading to increased discharge incidents into Dublin Bay, therefore, in combination with other plans or protects. negatively impacting on the South Dublin Bay SAC, in contravention of the Habitats Directive.



2.1.4.2 Treatment Capacity Report Summary - Ringsend WWTP

Treatment capacity is an assessment of the hydraulic (flow) and organic (the amount of pollutants) load a treatment plant is designed to treat versus the current loading of that plant.

RINGSEND WWTP	
Peak Hydraulic Capacity (m³/day) - As Constructed	959,040
DWF to the Treatment Plant (m³/day)	274,076
Current Hydraulic Loading - annual max (m³/day)	832,269
Average Hydraulic loading to the Treatment Plant (m³/day)	458,641
Organic Capacity - Design / As Constructed (PE)	1,640,000
Organic Capacity - Current loading (PE) - peak week load	2,278,887
Organic Capacity – Remaining (PE)	0
Will the capacity be exceeded in the next three years? (Yes/No)	Yes

No flow or BOD data was discounted by IW for 2020.

Public Transport Deficiency

There is an existing deficiency in public transport serving the area proportionate to the existing, permitted and planned residential developments in the area (including recently permitted SHDs for 590 units on Scholarstown Road, Dublin 16 - Case Reference: ABP-305878-19 and 496 no. apartments at Taylors Lane and Edmondstown Road, Taylors Lane, Ballyboden, Dublin 16. Case Reference: ABP-307222-20). The Transport Strategy for the Greater Dublin Area 2016 – 2035 published by the NTA divides the GDA into corridors. The proposed site is located within Corridor E. The strategy notes that public transport mode share in Corridor E for all trip purposes is 9%, with the car mode share for all trip purposes at a staggering 73%. The modal share is symptomatic of the deficiency in public transport infrastructure in the area. The proposed development, will exacerbate car dominance and

traffic in the area. The Strategy states 'Corridor E is made up of generally suburban residential development and is not defined on the basis of a major transport route, road or public transport service. It presents a challenge in that respect as it is more difficult to serve with high capacity public transport than other corridors'.

'For the Metropolitan parts of this corridor, the performance of the Rathfarnham Quality Bus Corridor is poor relative to others and requires enhancement. As such, a number of options, including Light Rail, have been examined. However, due to the land use constraints in the corridor and owing to the pressure on the existing road network, a Luas line was not deemed feasible'. As noted herein, and outlined by the strategy above, this corridor will never see the benefits of high capacity public transport which allow high density residential development to be absorbed sustainably.

The proposed development is therefore over development on a highly constrained transport corridor. A reduced quantum of units is demonstrably the more suitable solution for this site. As discussed further herein, the residents of Ballyboden/Whitechurch/Edmondstown will not see any noticeable improvement from the proposed Bus Connects project and indeed there is huge concern amongst residents that the bus service will deteriorate, with routes commencing in Tallaght that are at capacity by the time they reach Ballyboden.

It should be noted that SHDs of this scale and quantum have typically been permitted on sites adjacent to high quality public transport corridors and proximate to substantial social and community infrastructure and services – it is patently clear that the proposed site benefits from neither.

The site is not located proximate to a Town Centre, District Centre or Village Centre as defined in the urban hierarchy set out in the South Dublin Development Plan 2016-2022. In addition, the area is comparably poorly served by public transport and deficient in social and community infrastructure and facilities (particularly retail); and is completely incapable of absorbing this additional quantum of development in a sustainable way (having regard also to the quantum of permitted residential development in the area), and in fact will reinforce car dependency. Given the significant infrastructure constraints in the area, a reduced quantum of units would be more appropriate on this site.

In contrast to large scale high density SHDs permitted in Dublin in recent years, the proposed site is not proximate to a Dart station, a Luas station or a commuter rail station. Nor near a QBC, does not benefit from a dedicated bus lane, and as a consequence shares the lane with commuter car traffic; with the capacity constraints, inevitable delays and slow service inherent in such an arrangement. This proposed development is therefore not reconcilable with transport policy TM1 Objective 6 outlined in South County Council's Development Plan 2016-2022 which states;

"To support the delivery of sufficient public transport and road capacity to facilitate sustainable new development in the County".

In relation to the proposed Bus Connects project, Core Bus Corridor Route 12 - Rathfarnham to City Centre 12 is intended to terminate at the intersection of Nutgrove Avenue, Grange Road and Rathfarnham Wood; c.2.3km north of the proposed development. We note therefore that local existing public transport capacity will remain constrained even with the provision of this potential infrastructure at a future date.

It is considered best practice and preferable to direct high density development into areas which have excellent public transport, employment, retail, and social/community infrastructure rather than to poorly served and capacity constrained areas such as the subject site. None of the ingredients are in place to encourage existing and future residents to increase modal shift away from car use to more sustainable modes of transport and Bus Connects will not address this.

Traffic Impact/ Cumulative Traffic Impact

We would implore An Bord Pleanála to thoroughly examine the applicant's cumulative traffic studies, models and conclusions and obtain expert technical advice if required to scrutinise the traffic documentation. It is considered that the cumulative traffic studies are deficient and the methodology utilised by the applicant fails to present the worst case cumulative impact as required, having regard to the already highly constrained baseline, the addition of numerous recent residential developments, and the permitted and proposed developments in the area. An overall Traffic Impact Study/traffic management plan for the area is outstanding and was referred to in recent permitted developments in the area. An overall traffic study is required prior to any approval of further residential development in the area. We wish to highlight the significant additional strain to be potentially placed on an already heavily congested road network by recent, permitted and proposed developments in the area.

Public Participation- Aarhus Convention, EU Law & Covid Restrictions etc

We believe that our ability to study the complicated documentation associated with tis SHD application was restricted and to fully participate in this public consultation was extremely difficult and we respectfully submit that this public consultation is contrary to the Aarhus Convention. We believe that the public were prohibited from taking part in this public consultation in a reasonable, unrestricted and meaningful manner including the public inspection of hard copies. We were precluded from participation in the tripartite meetings and therefore we have had no chance to put forward our local knowledge/insight for consideration. ABP is not in a position to seek 'Further Information' or Clarification of Further Information and therefore we have been robbed of any opportunity to have a meaningful say in the development of our area which is contrary to Local Agenda 21.

- This current phase of the development outlined in the Spatial Framework Study for a new neighbourhood at Edmondstown comparable to Stephens Green Section (4.3. A suburban set piece) is being proposed by the applicant but not only is this inappropriate comparison it is simply not deliverable in this receiving environment. In planning terms you are comparing as the applicant states 'a city core development' and placing it in the middle of a site where cows are currently grazing. It is a fanciful but unrealistic comparison.
- It is clear, that this is piecemeal development and that this Spatial Framework Study which includes other lands (of which we don't know the detail of) cannot be appropriately assessed.
- This represents piecemeal development and fragmentation which is contrary to the EIA Directive.

The Guidelines further state in 3.2.3 that the whole project needs to be described and assessed as a whole and not be divided or split into several parts:

CASE LAW

In Case C-142/07 Ecologistas en Acción-CODA v Ayuntamiento de Madrid, (2008) the Court of Justice of the European Union (CJEU) held that by splitting most of the the project into sections

that were less than 5 km (the threshold above which national legislation required EIA), there was a failure to consider cumulative and indirect impacts of the project.

The Judgement in this case stated 'The objective of the EIA Directive cannot be circumvented by the splitting of projects. Where several projects, taken together, may have significant effects on the environment within the meaning of Article 2(1), their environmental impact should be assessed as a whole. It is necessary to consider projects jointly in particular where they are connected, follow on from one another, or their environmental effects overlap.'40

The whole project needs to be described.

In Section 3.5.7 references off site or secondary projects need to be considered or screened.

These are projects that may arise largely because of the existence of the principal project.

CASE LAW

In O'Grianna v An Bord Pleanála (IEHC 632, 12/12/2014) the High Court quashed the decision of the Bord granting planning permission for a wind farm in County Cork on 'project splitting' grounds. The developer maintained that the EIS could not consider the effects of the connection of the wind farm to the national grid as that design was not available and would be undertaken subsequently by ESB Networks. The Bord accepted this position and clarified that the grid connection was not covered by its permission to develop the wind farm.

The Court held that grid connection was an integral part of the development and could not be considered as a separate project.

'The wind turbine development on its own serves no function if it cannot be connected to the national grid. In that way, the connection to the national grid is fundamental to the entire project, and in principle at least the cumulative effect of both must be assessed in order to comply with the Directive.'

The decision by the Applicant to approach the planning process with different and very separate planning vehicles for the larger framework site, albeit in multiple parcels, we respectfully submit, is a form of piecemeal development (project splitting) as it does not describe the whole project and therefore their EIA screening Report has failed to consider the 'cumulative and indirect impacts of the project', that is the whole project

Many people did not have the opportunity to inspect the files within the An Bord Pleanala building. An Bord Pleanala refuses to upload their public files online. In addition, there were restrictions at the

We also note that SDCC did not upload any pre-planning or tri-partite documentation, so it is not possible to make a complete and detailed observation on the SHD and its origins which is the standard and practice. We note that the transport documentation were uploaded to a different planning application file.

The Archaaelogical assessment is inadequate and failed to take into account the Battle of Kilmashogue (see article) and the establishment of the Cistercian Monastery on Whitechurch Road

For example Ernie Shepherd in his book 'Behind the Scenes'.

"Whitechurch has been variously known as Alba (Ecclesia Alba appears in a list of churches in the Dublin Diocese in 1536), Balgeeth and Kilhunsin or Cill Fhuinnsean—the Church of the Ashes."

We submit from local researchers that The Church of the Balgeeth which came from David de St Michael whose father acquired the lands from Strongbow.

We submit that the subject site is within the attendant grounds of St Marys of the Blessed Virgin Abbey founded in 1139. However settlement of this site goes back further and it is research by local historians including years of research work done by the Rathfarnham Historical Society that has alerted us that this subject site of Palmyra was within a monastic settlement (one of 15 monastic settlement including Mellifont) run and founded by the Cistercians and that the proposed archaeological works proposed are wholly inadequate. We also submit that the desktop and online research cannot be accepted as a full historical and archaeological record and picture of the site and is therefore incomplete. An assessment of the site requires further information and more detailed research than what the Applicant is proposing and has presented to date.

In conclusion, this development represents one of the worse planning applications we have seen in recent years and it is clearly contrary to sustainable development, the SDCC Development Plan, its zonings, objectives and policies, principles of proper planning, common sense and EU Law

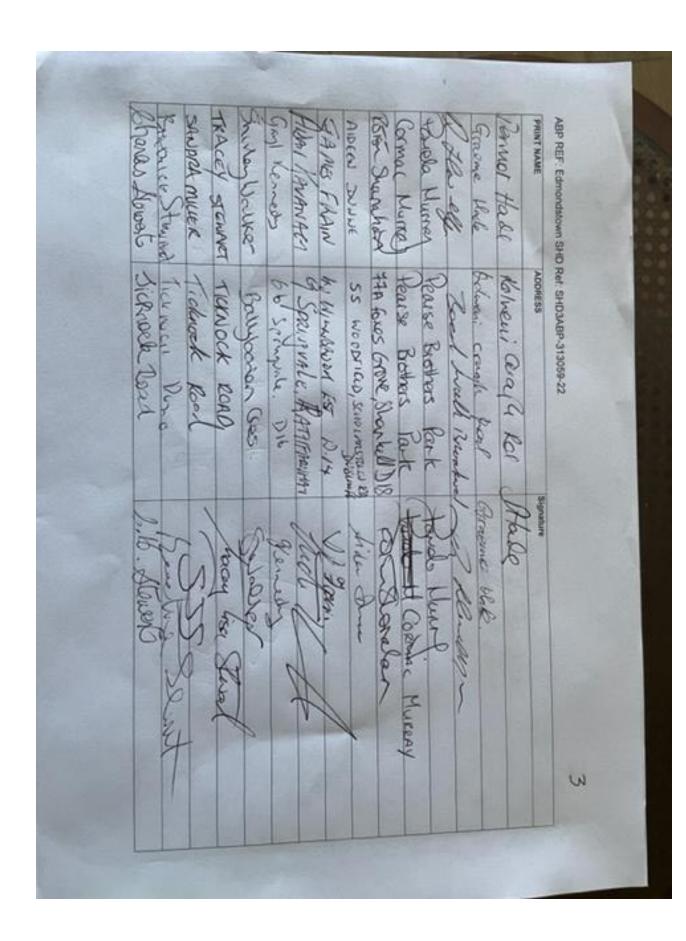
Yours Faithfully,

Angela O'Donoghue &

Agent for the attached signatories below

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Excerpt from an Article from the

The Irish standard. (Minneapolis, Minn. ; St. Paul, Minn.), 1888-02-04, [p].

IRELAND'S BATTLEFIELDS.

Battles of Kilmashogue, Suicoit, and Gbnmama.

BY WKSTON ST. JOHN JOYCE.

"In 795 A. D. the Daues first visited Ireland. Thuutfti commonly called . Danes, they came not only from Denmark proper, but also from Norway, Sweden and in geu^ral from the islands and coasts of the Biltic. Finding that Ireland offered a t'air field for plunder they aoon came in larger numbers and organized a series of predatory expeditions. chiefly directed against the . wealthy ecclesiastical establishments. They continued these laids, with few reverses, up to about the year <838, wh'-'n, under Turgesius, they estab listed themselves in Dublin, when they . erected a stronghold probably on the hill now occupied by the Cast,le and Christ Church Cathedral.

Once established in Dublin ihey gradually extended their power, till in a few years a gre^tc part of the country groaned beneath the oppression of these ruthless barbarians.

From about 912 to 016 a constant succession of Danish fleets and expeditions poured into Waterford, taking possession of the towu, such as it was then, durinar which time it is supposed by soroe that they built Reginald's Tower, still standing perfect on Iht i | ua.ys. They then ravaged ail south-eastern Monster, occupying every harbor and fortress of importance, and compelling the inhabitants to pay tribute. In 916 they defeated the King of Leinster at Cerm Fuat, said Co be Confoy, near Leixiip, where fifty Irish

chieftains were slam. Encouraged by these successes, another great reinforcement shortly afterwards arrived in Dublin and encamned in the neighborhood. Niall Glunduff, King of Ulster,

hearing of this fresh invasion, marshalled nis troops and clansmen, and

marched on Dublin to.attack them. The Danes then retired to the mountains, probably to choose their ground, and on Wednesday, I-5th September, 919, the opposing forces met at Kilmashogue Mountain, above Whitechurch, about six miles from Dublin, where an obstinate and bloody battle

was fought, in which the Irish were disastrously defeated, brave King Niall, with t welve tributary Kings and a great number of Ulster uobles, being numbered among the slain. From the strange site chosen for this battle in the mountains, then covered by primeval forests, it is not unlikely that the Irish were entrapped into an ambuscade, as they were much le>s skilled in such artifices than their adversaries. The remains of a cromlech within the grounds of Glensouthwell, on the side of Kilmashogue mountain, in all prob ability marks the spot where King Niall or some of these ehieftaius was buried after the battle. A year after this reverse the Irish had ample revenge, for they defeated the Danes with great slaughter at a place, unidentified, in the county Meath, where, in the words of the old chroniclers, "there escaped not more than enough to tell what had happened; and there fell of the nobles of the Norsemen here as many as had fallen of the nobles and pleibeans of the GKel (Irish) at the battle of Ath-cliath," meaning Kilmashogue......"