



**North City Walk Group
Submission to the GAA on
The Masterplan for the
Holy Cross College Lands at Clonliffe**



**SUBMISSION TO THE GAELIC ATHLETIC ASSOCIATION & DUBLIN CITY COUNCIL ON
THE MASTERPLAN FOR
THE HOLY CROSS COLLEGE SITE AT CLONLIFFE – THE DRUMCONDRA PORTFOLIO**

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August 2019

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1. Background and Introduction

The Holy Cross College site at Clonliffe, Drumcondra lies between the Tolka River to the North and Clonliffe Road to the south and Drumcondra Road to the West and Distillery Road to the East.

It is one of the last major green urban spaces in the North Inner City.

Holy Cross College was built in 1863 and most of these lands were in church ownership for over one hundred and fifty years. They contain many fine church buildings, mature trees, open spaces and natural habitats.



Map 1: Extract from OSI Historic Map 25 inch (1888-1913) showing Archbishop's House, Holy Cross College and the Red House

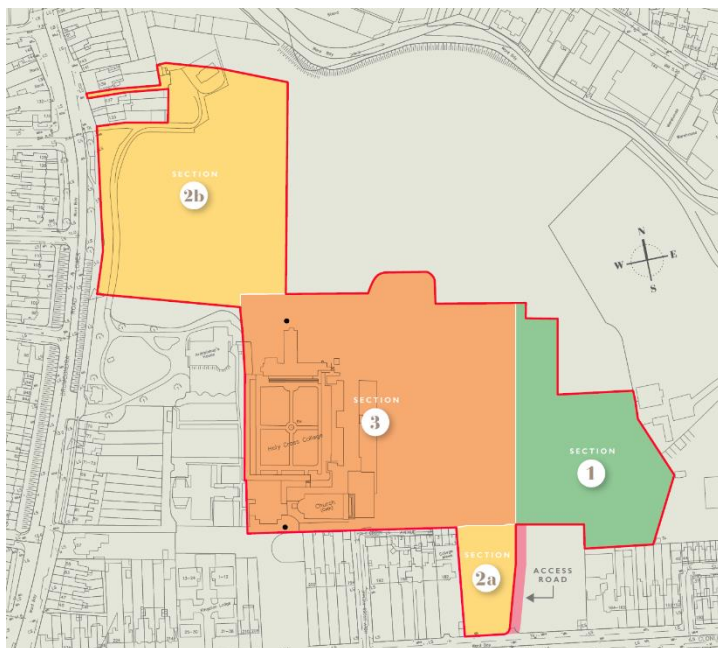
(Green arrow indicates that this area on the site was traditionally a woodland area)

The GAA which recently acquired the site from the Catholic Archdiocese is now selling 19.1 acres of the lands through Hooke and McDonald Estate Agents who are marketing them as the "Drumcondra Portfolio".

A well-attended public meeting was held in the Croke Park Hotel on Wednesday 31 July 2019 to outline a proposal for a North City Walk of approximately five kilometres, linking heritage sites along the Royal Canal and the Tolka River, from Ballybough to Phibsborough, Cabra, Glasnevin, Drumcondra and Clonliffe (See attached North City Walk document). The importance of integrating the lands at Holy Cross College site, particularly along the Tolka River, into such a proposal was a focal point of the meeting.

Because the lands are former institutional lands a Masterplan has to be drawn up and agreed with Dublin City Council before any development can take place.

The large attendance at the meeting expressed their enthusiasm for the North City Walk and urged that continued public access to the Clonliffe lands and, particularly, the Tolka River would be incorporated into the Masterplan. It was agreed that a submission would be prepared and submitted to the vendor, the GAA.



Map 2: The Drumcondra Portfolio

The coloured sections indicate the areas for development

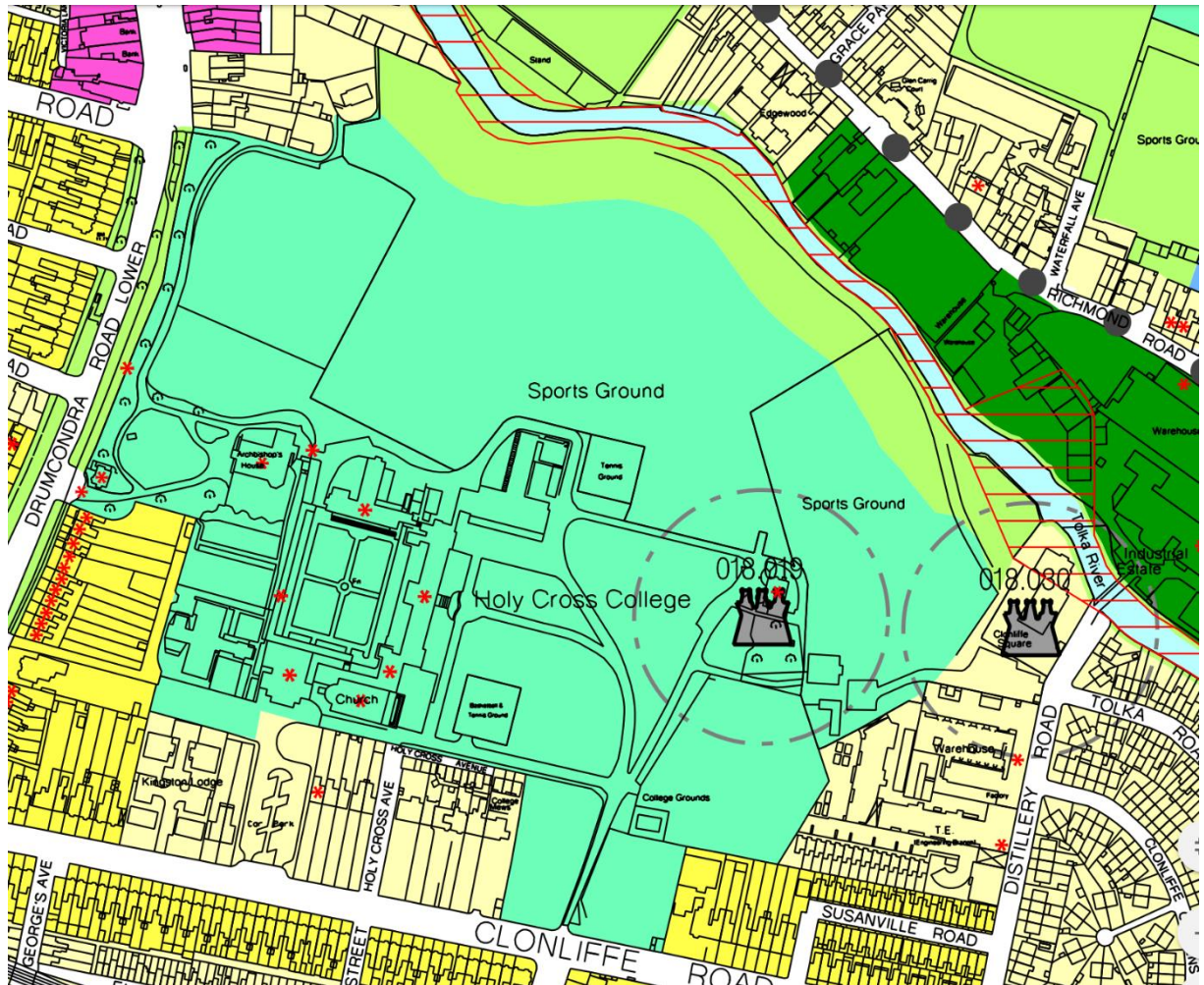
2. ZONING

The Holy Cross site is zoned Z9, Amenity Open Space Lands/Green Network and Z12, Institutional Land - Future Development Potential, in the Dublin City Development Plan 2016-22 (Map 3).





A significant portion of the residential areas adjacent to the site is zoned Z2, Residential Conservation Area, with the objective of “protecting and/or improving the amenities of the residential conservation areas”. The remaining residential area adjacent to the site is zoned Z1, Sustainable Residential Neighbourhood, with the objective of “protecting, providing and improving residential amenities”.

The strip of land stretching along the Tolka River from Cian Park, Drumcondra Road to Distillery Road (Map 1) is zoned Z9. The objective of Z9 zoning is to “preserve and improve recreational amenity and open space and green networks”.

The lands that are being sold and redeveloped are adjacent to the Z9 lands along the Tolka. These lands are zoned Z12, the objective of which is “to ensure existing environmental amenities are protected in the predominantly residential future use of these lands”. The Drumcondra Portfolio will be developed in the context of the provisions of Z9 and Z12.



USE ZONING OBJECTIVES

Zone Z1	To protect, provide and improve residential amenities	-----	
Zone Z2	To protect and/or improve the amenities of residential conservation areas	-----	
Zone Z9	To preserve, provide and improve recreational amenity and open space and green networks	-----	
Zone Z12	To ensure that existing environmental amenities are protected in the predominantly residential future use of these lands	-----	

Map 3: Land Use Zoning, Dublin City Development Plan (2016-22)

3. MASTERPLAN ISSUES

The public meeting and subsequent discussions identified the following issues to be of central importance for the Masterplan:

i. The Tolka River

The river is a wonderful amenity. It is totally unspoilt containing numerous types of trees such as lime, cypress, poplar, ash and sycamore. There is an abundance of shrubs and wildflowers on the riverbank.

The river is a natural habitat for birds such as kingfishers, herons, egrets and dippers. There is a large colony of bats along the river. The river itself contains a substantial population of stickleback fish, brown trout, and invertebrates.



Along the River Tolka

Public access to this amenity, where it passes through the Holy Cross site, is available at present from Clonliffe Road. Clearly it is important to the community that access is not restricted in any way and indeed that it be enhanced through the provision of access from Drumcondra Road thereby facilitating an important linkage in the North City Walk along the Tolka through Griffith Park on the other side of the road.

Although the Z9 lands along the Tolka River are not included in the Drumcondra Portfolio, their proximity to the site is of strategic importance and it is paramount that the proposed development will not endanger or compromise in any way the unspoilt, natural habitat along the river

ii. Trees and flora

The Holy Cross College site has a wonderful canopy of mature trees, probably the finest and most varied on the Northside of the City. It also contains a considerable quantity of hedgerows and undergrowth.

There are approximately 330 mature trees most of them in excess of 15 metres in height (see Appendix 1 for a comprehensive list and description of trees on the site).

It is essential that a Tree Survey is carried out by a qualified arborist as part of the Masterplan before any intrusive work can start on the site. The tree survey should be available to the public as part of the consultation process.

Trees, particularly mature trees, are incredibly valuable in capturing and sequestering CO2 emissions and other pollutants, in providing cover for small animals and homes for nesting birds and bats. They provide shade and protection against wind and act as a barrier to traffic noise along the busy Drumcondra Road. Limes, horse-chestnuts, sycamore, holm oak, atlantic cedar, willow, red maple, locust, birch, beech, plane, cypress, poplar and ash contribute to the staggeringly rich variety of trees on the site. There is a stand-alone, majestic horse chestnut tree in the centre of the park which is much loved by the local community.

The masterplan should provide for the retention of all healthy mature trees on the site and work around them. It would make for an architectural and aesthetic masterpiece, (See the Dublin City Tree Strategy, [2016 -20] and Appendix 1).

A large variety of wildflowers are flourishing on the lands including buddleia, red valerian, bindweed, cowfoot, yellow-cress and meadow grasses. . A full survey of the wildflowers should be carried out as part of the overall biodiversity plan for the site. Priority should be given to the preservation of these unspoilt natural habitats rather than the development of manicured landscaped areas.

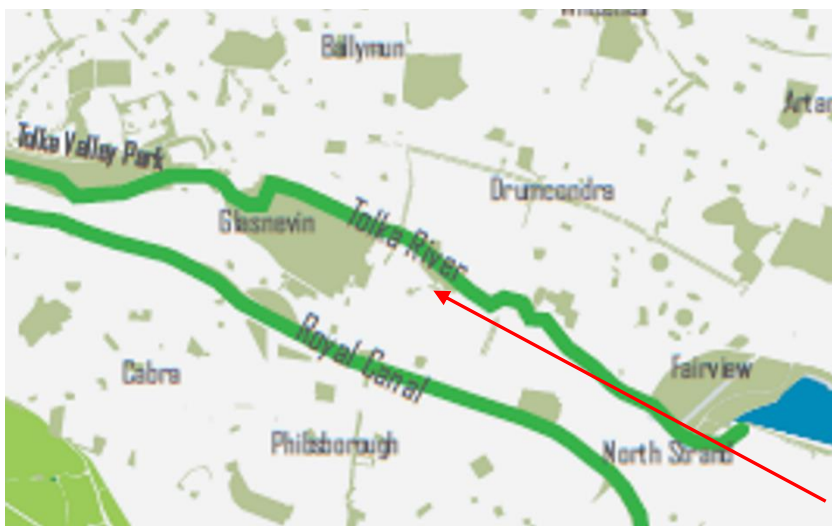
iii. Green Infrastructure & Public Open Space

The Drumcondra Portfolio is one of the last green lungs in the North Inner City. While development on the lands is now inevitable, it will be important to preserve the green infrastructure this site provides for the City.

The Dublin City Development Plan highlights the importance of “balancing the need of the city to consolidate with the need to protect and enhance vulnerable natural areas” (page 162). Chapter 10 of the Development Plan is devoted to the development and enhancement of the City’s green infrastructure.

Dublin City Council defines “Green Infrastructure” as “an interconnected network of green space that conserves natural ecosystem values and functions that also provides associated benefits to the human population. It is a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services. It incorporates green spaces (or blue if aquatic ecosystems are concerned) and other physical features in terrestrial (including coastal) and marine areas.” (DCDP, 10.5.1)

The City Development Plan’s Strategic Green Network identifies the River Tolka as a



Map 4: Dublin City Council Green Infrastructure
(Red arrow indicates Holy Cross lands)

Blue/Green Corridor with the objective of “developing linear parks, particularly along waterways and to link existing parks and open spaces in order to provide green chains throughout the city.” It is also clear that “where lands along the waterways are in private ownership, it shall be policy in any development proposal to secure public access along the waterway. (Policy G13, Dublin City Development Plan”.

There is a unique opportunity to achieve this objective of the Dublin City Development Plan through the incorporation of the North Dublin Walk into the Masterplan. 'Such a North Dublin Walk would link up with green spaces further up the Tolka: Griffith Park, Violet Hill Park, and Tolka Valley Park, thus providing an almost continuous green corridor up to Ashtown. Linking the Clonliffe lands to the North Dublin Walk, at this point, would give much added value to the Drumcondra Portfolio.

The Masterplan will need to identify the strategy for the provision of the 20% “accessible open space” requirements for residential developments in lands zoned Z12. The Dublin City Development Plan (2016-22) is clear that the open space on Z12 lands cannot be split up into sections but must be contiguous so as “to ensure a co-ordinated approach to the creation of a high quality new public open space on new lands linked to the green network” (p.248). It must be comprised of soft landscaping suitable for adult relaxation and for children to play. Moreover, it should be linked to the green network of other lands where possible.



Trees along the River Tolka

The provision of a high-quality green and natural landscape is of critical importance to residents. The rich biodiversity on the existing site must be maintained through the retention of the wooded and grassed areas rather than having a high degree of “manicured” landscaping.

iv. Permeability

It is a major concern that the proposed development not be of the “gated community” type and that it contains ordinary public streets in keeping with the character of the neighbourhood. Indeed, the Dublin City Development Plan specifically states that “gated communities will be discouraged as they prevent permeability” (p. 305).

An Urban Design statement will be required to show “how any proposed access points, routes or new streets are interconnected logically with the existing local network of streets, to aid legibility, permeability and walkability and complement local ‘desire lines’” (Dublin City Development Plan, p. 332). Similarly, Policy G15 of the Development Plan seeks to “promote permeability through our green infrastructure for pedestrians and cyclists”.

Hence, public access from Drumcondra Road and Clonliffe Road is considered essential, linking up with a Tolka River Walkway along the riverbank.

Croke Park is now a heritage site in its own right on the banks of the Royal Canal. The Clonliffe entrance to the Holy Cross College site at the junction of Clonliffe and Jones’ Road is the right of way that is key to linking the two waterways, Croke Park and other heritage sites.

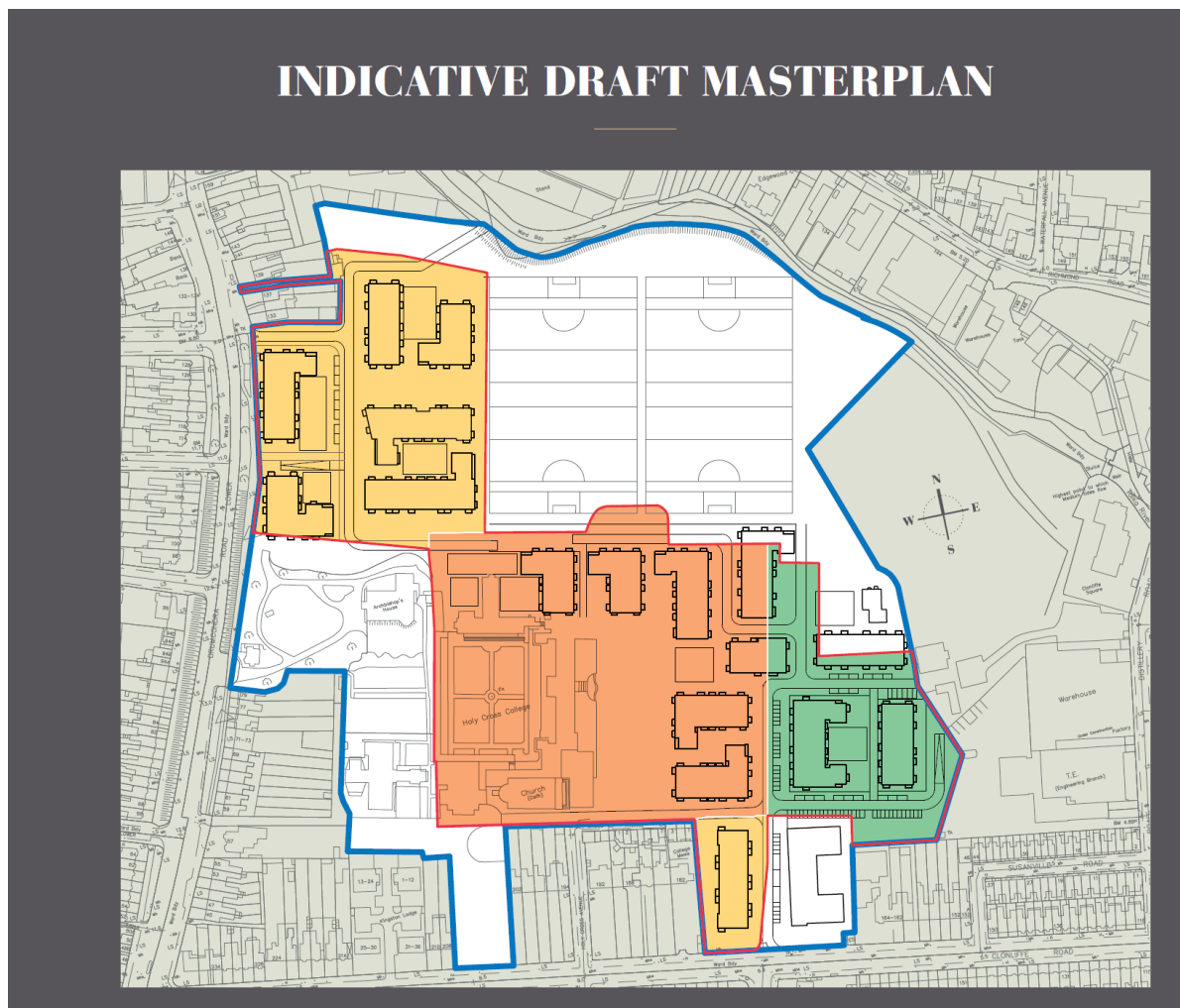


The magnificent open space of the Clonliffe grounds

v. Residential Development: Height; Density; Standards; Infrastructure; Car-parking

According to the sales brochure an indicative number of 1,200 residential units could be constructed on the site in a number of blocks.

There is serious concern as to the impact such a **high-density** and **high-rise** development will have on the existing community. The indicative Masterplan outlined in the Estate Agent's brochure seems to constitute gross **over-development** of the site with an excessive number of units/buildings and with scant regard for the open spaces and biodiversity on the site.



Map 5: Indicative Draft Masterplan, Source Hook & McDonald Sales Brochure

Height: As outlined in the Zoning section above, the site is bounded primarily by Z2 and some Z1 residential houses. The Dublin City Development Plan (2016-22) states that the development should have regard to the “prevailing height of existing residential development” (14.8.12, p. 248) and also states that “it is important to avoid abrupt transitions in scale and use zones. In dealing with development proposals in these contiguous transitional zone areas, it is necessary to avoid developments that would be detrimental to the amenities of the more environmentally sensitive zones” (14.7, p.237).

The prevailing height in the area is two/three storey. Excessive height and density in comparison to the prevailing residential character of the area would be opposed by many people locally. The entire development should be of the highest quality design and should blend with all the old institutional usage.

The development should not be in any way injurious to the residential amenity of the surrounding community and should be particularly cognisant of the residential conservation area. Moreover, a substantial number of the existing buildings on the site are on the Dublin City Record of Protected Structures and any new development on the site must have due regard to the impact on these buildings.

Infrastructure: The Masterplan should identify what infrastructure will be required to support a development of this size, including water/drainage/sewage, energy (green carbon neutral buildings) and transport (including car-parking).

Tenure: There should be a good mix of family units, including three and four bedroom units. The emphasis should be on owner-occupied family units rather than one and two-bedroom units aimed at the rental or short-term let market.

Social & Affordable Housing: The Development Plan has a requirement for at least 10% social or affordable housing on Z12 lands. The GAA has directed that there will be 10% social and 10% affordable housing on the lands to be developed. That is a very positive and welcome development and appreciated by all who attended the public meeting.

Car-Parking: Clarification will be required on car-parking. A development of this scale will require carparking facilities notwithstanding the proximity of the site to rail and bus transport hubs. The masterplan should indicate the type and quantity of carparking facilities permissible.

Heritage and Archaeology

Holy Cross College is a significant heritage site with a number of buildings listed on the Dublin City Record of Protected Structures including: the main college building (1863); Holy Cross Church; the south link building; the ambulatory and the assembly hall. The Red House (Buck Jones House) is both on the Record of Protected Structures and is listed as a site of archaeological importance. Indeed, all of the institutional buildings are of considerable merit in terms of heritage, structure and character.

With such an array of heritage buildings there is need for great care and sensitivity in terms of their incorporation into the overall development and in terms of their future use. The Masterplan should present a survey of the buildings and detailed plans for any works and future uses.

Any new development on the site must have regard to the protected structures to preserve the integrity and character of those buildings and of the adjacent trees.

vi. Sports Facilities

There are currently a number of sporting facilities on the site. Clarification is required on whether the sporting facilities to be developed by the GAA outside of the lots being offered for sale in the Drumcondra Portfolio are included in the open space requirement.

The provision of sporting facilities is to be welcomed. However, these facilities should be accessible to the local community. The provision of all-weather pitches should not be counted as part of the open space requirement of the site. Such pitches should be sited so as to preserve the free-standing horse chestnut tree mentioned above.

4. CONCLUSION





There is support for a new residential and mixed-use development on the site. It should be possible to have a good quality residential development providing much needed housing for families while preserving the open space and protecting the local biodiversity.

The development of a Masterplan provides a unique opportunity to develop the proposal for the North City Walk as outlined in the attached document.

The map below is indicative of the potential within the Drumcondra Portfolio to contribute to this overall vision.

We look forward to future engagement with the GAA, Dublin City Council and the Developer in agreeing a Masterplan that will enhance and contribute to the local community and make a significant contribution to the City's Strategic Green Network.



-  Popular pedestrian walk through site
-  Area consider to have important public amenity value
-  Valuable city centre ecological store and sheltered forest walking route
-  Possbile future links to other green linear parks along the Tolka River

Appendix 1: Retention of trees on the Holy Cross site

This submission regarding the protection of the trees on the grounds of Holy Cross College is part of a wider submission, aiming to maintain public access to the grounds as part of a linked North City Walk, to protect the wildlife habitat and green corridor of the Tolka riverbank, and to maximize green space and tree canopy as part of a necessary local contribution to environmental protection and the fight against climate change.

We are aware that not all the site is proposed for development, but since the boundaries of what is proposed are not known to us, we have included in this document all the trees contained on the full extent of the grounds. In sum, the site contains approximately 330 mature trees, most of them above 15m in height and therefore corresponding to what the [*Dublin City Tree Strategy 2016-2020*](#) classifies as large trees, specifying that ‘evidence shows that large-species trees are key to creating climate-proof, happy and healthy cities for the future’ (p.36). The predominant species are lime and sycamore. The site’s hedgerows and undergrowth have not been quantified.

We are aware that planning regulations include specific requirements concerning trees on the site to be developed. Dublin City Council’s *Dublin City Tree Strategy 2016-2020* states:

‘The successful retention of suitable trees is a benchmark of sustainable development. Trees of good quality and condition are an asset to a site and significantly increase its attractiveness and value. (...) The Tree Strategy for the City provides the vision and direction for long-term planning, planting, **protection and maintenance of trees**, hedgerows and woodlands within Dublin City, and will be a material consideration in the determination of planning applications and other development.’ (p.18, our underlining)

The document further states that ‘Where development is proposed it is essential that existing trees are considered from the very earliest stages of design and prior to an application for planning permission being submitted’ (p.18). Our submission is an attempt to contribute to that process at the earliest possible stage, in accordance with the strategy’s stated goal of enhancing community involvement in the management of local green spaces (p.39)

Planning requirements with respect to trees include a survey by a qualified arborist, information on which trees are to be retained, and a tree protection plan. It appears that a survey has been done of the trees on the site, since many but not all have fresh number tags. These identifying numbers are referred to where appropriate in the inventory of the tree canopy on the Holy Cross site (see below). The trees are presented in groups from A to N, which refer to the spatial groupings on the map of the site (see end of document).

Context: Dublin Trees

The [*Dublin Tree Canopy Study*](#) (UCD, 2017, p.7) provides information about the extent of tree cover in the city. The Dublin City Council area, at 10.2%, has less tree cover than both the Dun Laoghaire-Rathdown (18.9%) and South Dublin County Council (17.3%) Within the DCC area, the spread of tree cover is not uniform: the North inner city is not well provided, and an area of very low tree cover is identified, extending from the docklands through the inner city and out to Crumlin and Tallaght. On the north side, there is a band of richer tree cover extending East from the Botanic Gardens, along Griffith Avenue and through Clontarf to St Anne's Park (p. 9). Geographically, the Holy Cross site falls between these two contrasting bands. The only other significant green spaces available for those living close to the site are Griffith Park and Fairview Park. It is clearly the case that the grounds have served as an unofficial green amenity for the local community for many years, and that the complete loss of access would be of significant detriment to that community.

Trees and the environment

There is international scientific consensus that, globally, deforestation is an important component of the climate crisis, and that the protection of trees is one of the ways in which we can limit environmental damage. In such a context, the destruction of trees should not be undertaken lightly, even if a small site like Holy Cross may appear to be a drop in the ocean.

Trees, particularly, as mentioned earlier, large species, contribute to environmental protection in a number of ways:

- CO₂ emissions are captured in their foliage and in the wood as it grows (respectively 'sequestration' and 'storage')
- Tree cover can reduce other forms of pollution by absorbing them through their stomata (pores), providing surfaces on which pollutants can settle, and reducing the circulation of pollutants by limiting air movement. The pollutants to which these procedures apply are carbon monoxide (CO), sulphur dioxide (SO₂), nitrogen dioxide (NO₂) and nitrogen oxides (NO_x), ozone (O₃), as well as particulate matter (tyre fragments, road dust, emissions from combustion).
- Stormwater runoff. The canopy slows down the arrival of water at ground level, and the root structure allows water to penetrate the soil rather than running straight off into the drainage system.
- Trees, depending on their location, provide shade, shelter from prevailing winds, and a barrier to traffic noise.

These benefits are recognized by the *Dublin City Tree Strategy 2016-2010* (p.10-11). The *Dublin Tree Canopy Study*, for its part, recognizes that the capacity of trees to absorb pollutants should not be overstated, and is only one of a range of possible responses to the climate crisis (p.21-22). But it is an element of our response, and this should guide planning decisions at a local level also.

Wildlife habitat

Trees provide a habitat for birds, bats and small mammals. If trees at Holy Cross are lost, some of this habitat will disappear. Maintaining a wild riverbank on the south side of the Tolka appears to be the most crucial issue here: dippers, kingfishers, wagtails, herons and egrets frequent this stretch of river, as they do further upstream, and the trees and bushes provide important cover for them.

Green space and community wellbeing

As stated above, the grounds have provided a green space for the local community. People come to the grounds to find quiet, to breathe unpolluted air, to see the river, to be in contact with nature. But there is also an aesthetic dimension to the wellbeing which such a space promotes: mature trees are beautiful, and none less so than certain individual trees (the horse chestnut at area N) and the long stands of mature limes (areas B, C, L).

Priorities for tree retention in light of the above rationales

Ideally, the development plan would accept the retention of all the trees on the site, and work around them. Even if a policy of replanting to compensate for lost trees were to be pursued, it would be many years before the new trees attain the maturity needed to fulfil the functions of those destroyed.

If such a forward-looking strategy were to be rejected, we would argue that the trees in the following blocks (see attached map) are priorities:

L: Forming a block with K, the trees here form a pollution and traffic noise barrier adjacent to the busiest road adjoining the site, Drumcondra Road, and protect the Western part of the site from the prevailing Westerly winds. Surely this is a benefit which would be enjoyed by residents of any development. Furthermore, this section, together with K, contains a long line of approximately 37 mature limes which, in aesthetic terms, are outstanding.

M: This block of trees and associated brush provides a wildlife habitat and maintains the wild character of the riverbank.

N: Freestanding horse chestnut of outstanding size and proportions (tag 1007)

B, C, and I: Aesthetically outstanding rows of mature limes and other trees

H: Block of mixed trees in proximity to a protected building. Outstanding old yew 959

A, J: Blocks of trees in proximity to existing buildings or boundaries.

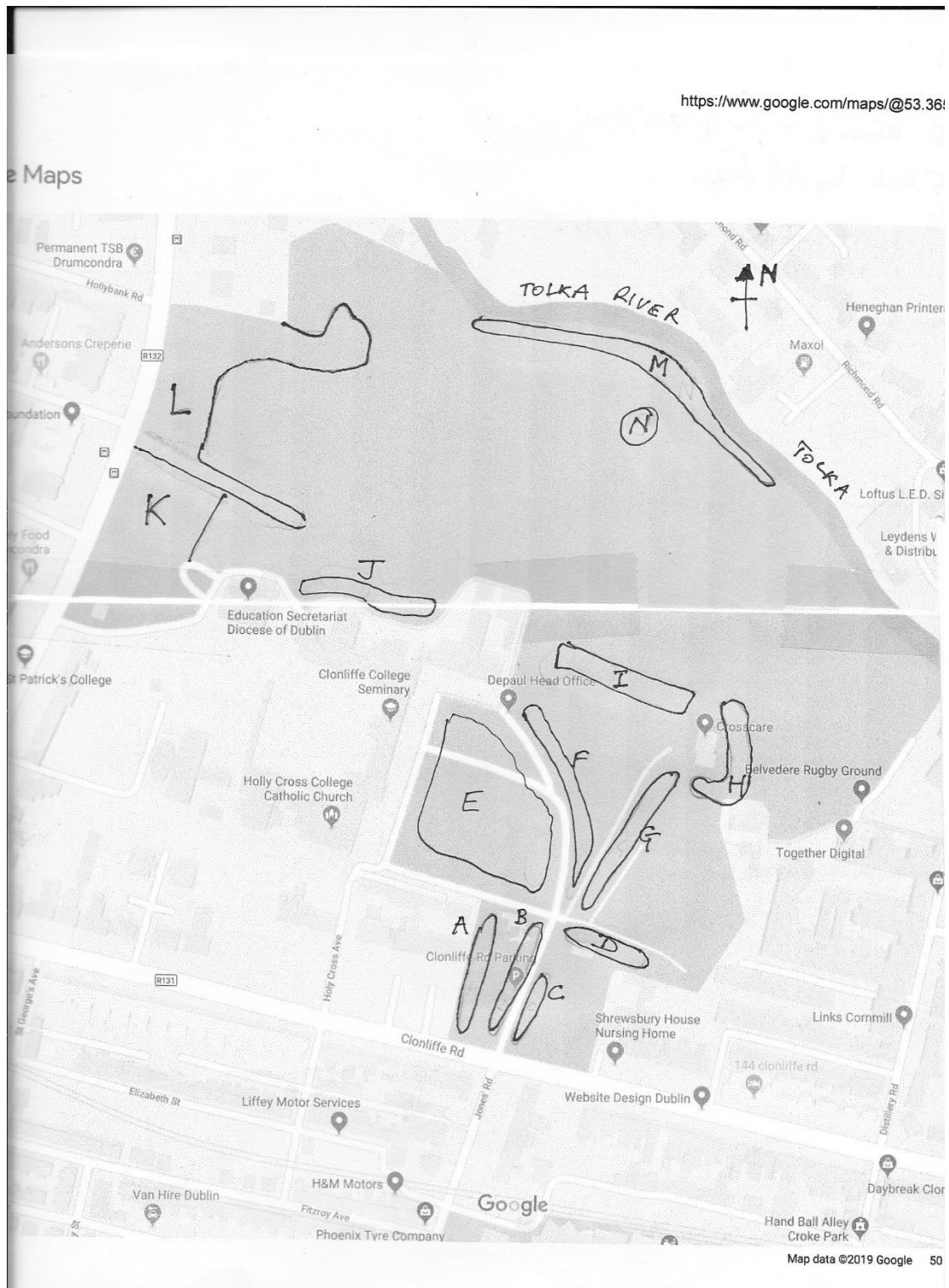
Holy Cross Trees by spatial grouping (refer to map below)

The identification numbers correspond to the recent tree survey

- A** 12 limes and sycamores. Untagged and 930-935
- B** 12 limes 912-921.
Horse chestnut and sycamore 922 and 923
- C** 6 limes 935-940
- D** 3 horse chestnuts and 2 sycamores 941-945
- E** Area in front of college: approx. 20 dispersed trees, including
5 holm oaks 989, 991-995
3 Atlantic cedars 988, 996, 1008
1 willow 995
Red maple 1005
Locust 1001
- F** 3 limes 946 947 949
12 birches including 1010, 1013 - 1015
- G** Horse chestnut 948
Beech 950
8 limes including 951, 952, 956
- H** South of Buck Jones House 20 mixed
North of Buck Jones House 1 lime, 1 horse chestnut 987
Front of Buck Jones House 1 yew 959
- I** Alley on both sides of Avenue, E-W
25 plane, sycamore, horse chestnut and lime, 961-985
- J** 14 mixed, some untagged, including 1054-1065, and 4 mature birches
- K** Approx. 65 mixed, untagged
Row of 12 limes untagged
- L** Forming a block with K, this is the biggest concentration of mature trees on the whole site
Along Drumcondra Road boundary wall:
25 mixed including lime 1056 and oaks at northern end 1034, 1036, 1037

- L** On East side of boundary path: row of 18 limes beginning 1031 and ending 1029, middle 16 apparently untagged
- 7 more limes and 3 sycamores where path turns to east at corner of property.
- There is a broad band of smaller trees and bushes on the East side of this block, bounding the meadow.
- Running W-E along southern edge of portion for sale: 25 *Leylandiae* beginning (W) 1051 and ending (E) 1052
- M** Riverbank West to East
- 15 mixed trees including Lime 1027
- 6 cypress
- 13 poplars, 1 ash, 1 sycamore. Last poplar 1018
- N** Freestanding horse chestnut 1017
- The single most magnificent tree on the site

Site map with spatial grouping of trees



References

[Dublin City Tree Strategy 2016-2020](#), Dublin City Council

Michael Brennan, Gerald Miles and Tine Ningal, *Dublin Tree Canopy Study*, University College Dublin, March 2017. Available online at

https://www.researchgate.net/publication/316441902_Dublin_Tree_Canopy_Study_Final_Report

The North City Walk



Proposed nature and heritage walk.

The route of the walk through mostly parkland incorporates two waterways (the Royal Canal and Tolka River) and five important heritage sites (Croke Park, Mountjoy Prison, Prospect/ Glasnevin Cemetery, the Botanic Gardens and Holy Cross /Clonliffe College). The Royal Canal, well maintained by Waterways Ireland is a wonderful example of civil engineering, now approximately 200 years old.

Nearly all pathways already exist to facilitate the walk, however for the route to proceed as proposed some additional things need to be done. The most significant being the provision of a pedestrian bridge over the railway line to allow the route to proceed from the Royal Canal towpath (between the 6th and 7th lock) to the Prospect Cemetery.

Also, the access entrance gate to Holy Cross College near the junction of Drumcondra Road Lower and Botanic Avenue would need to be reopened.

Two of the most popular heritage sites in north city Dublin are Croke Park and Prospect cemetery. The proposed walk would connect up these two sites by way of the Royal Canal. Both are within walking distance of each other and additionally incorporate the other interesting sites along the way. In particular, the part of the proposed walk along the banks of the Tolka River necessarily proceeds through the Holy Cross College site

It is expected that this walk would appeal to tourists and the general public and in particular to active age groups and school children.



November 2008. Tolka Riverbank in HolyCross College.

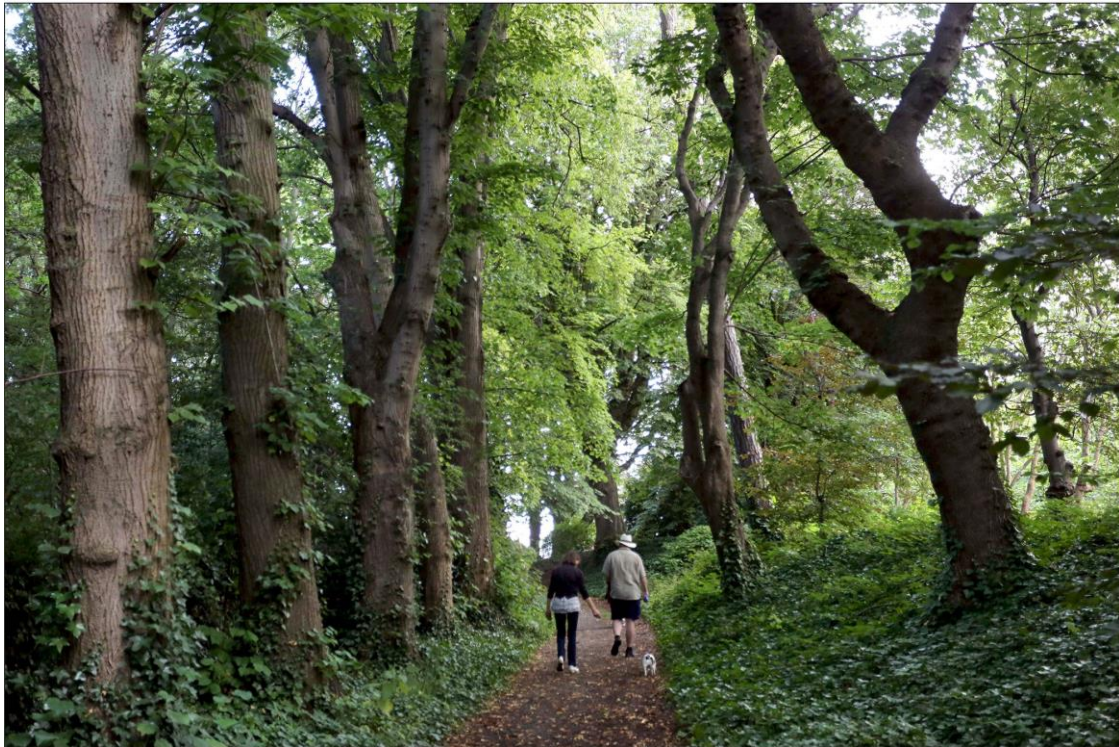
©Photo by DerekSpeirs

This walk project proposal could be developed jointly by the relevant public organisations including Dublin City Council, the GAA /Croke Park, Waterways Ireland, Iarnród Éireann, Prospect Cemetery and The Botanic Gardens, all of whom would individually benefit.



A more recent photo taken in July 2019.
of the Tolka Riverbank in Holy Cross College.

©Photo by Derek Speirs



©Photos by Derek Speirs

Holy Cross College. Photo taken recently in August 2019 of the historic woodland walk area inside the boundary wall with Lower Drumcondra Road. This area comprises the largest concentration of mature trees on the site, including Oak trees and Lime trees



Here the route through the Holy Cross College site featuring more mature trees leading to the main entrance on Clonliffe Road.

The proposed walk would continue along this route to finish back at the GAA Croke Park stadium.