

<b>Submission No.</b>	<b>128</b>
<b>Organisation Name or Name of Submitter</b>	<b>Irish Georgian Society</b>

<b>Item No.</b>	<b>Section Ref.</b>	<b>Page No.</b>	<b>Observation Statement</b>	<b>TII Response</b>
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**Letter Re: Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022**

1	1	1	<p>Accreditation of professional advisers</p> <p>While it is noted that a Project Conservation Architect is to be appointed, it is not indicated whether this individual/firm will be required to have a suitable conservation accreditation. As such, the IGS strongly recommends that the appointee is a RIAI accredited Grade 1 Conservation Architect and that a conservation engineer with appropriate accreditation is also engaged in the project.</p>	<p>The MetroLink Project Conservation Architect (PCA) Team was appointed by TI in January 2022 and is engaged for a 12.5 year period to ensure continuity of service. The PCA Team comprises multiple Conservation Architects all of whom are RIAI/RIABA accredited. The PCA team are supported by CARE accredited Chartered Engineers, Chartered Surveyors, Industrial Heritage and Stained Glass specialists.</p>
2	2	1	<p>Condition Surveys</p> <p>As the project is so extensive, it will be essential that sufficient resources are provided to the Project Conservation Architect to ensure that they have ongoing access to an adequate number of sufficiently experienced and accredited conservation professionals.</p>	<p>The MetroLink Project Conservation Architect Team is adequately resourced. Refer to response (1).</p>
3	3	2	<p>Permanent removal of elements of architectural interest</p> <p>The IGS has considerable concerns about the planned permanent removal of parts of structures of architectural interest as these will forever lose their originally intended context. In such case, the Society is of the view that a long-term plan for such items should be put in place and agreed with the Dublin City Council Conservation Office prior to the commencement of works.</p>	<p>As outlined in EIAR Chapter 26 (Architectural Heritage) a MetroLink Cultural Heritage Strategy (the current draft of which is provided in Appendix A25.1) has been prepared by TII and will be updated by the TII Project Archaeologist and MetroLink PCA team throughout the course of MetroLink to outline TII's approach and management of all Cultural Heritage constraints and impacts on MetroLink. This reflects the long term plan to manage elements of architectural interest. This is an outcome of the Code of Practice as agreed with TII and the now Minister for Housing, Local Government and Heritage (HLGH). The Planning Authority for MetroLink is An Bord Pleanála, however TII will engage with relevant divisions of each Local Authority on the management of any relevant structures of interest.</p>
4	4	2	<p>Temporary removal of elements of architectural interest</p> <p>It is noted that in a number of instances it is proposed to temporarily remove features of architectural interest and to reinstate these at a later stage. The IGS has concerns about such proposals as past experience suggests that the reinstatement of such items does not always go ahead. As such, it is recommended that as part of the planning process, a clear agreement for the removal, storage and reinstatement of relevant features is put in place with Dublin City Council Conservation Office.</p>	<p>A grant of an Enforceable Railway Order obliges TII to undertake all EIAR commitments in full, including the reinstatement of heritage items unless conditioned otherwise by An Bord Pleanála who are the Planning Authority for all Railway Works. TII have a good record of reinstating items previously removed on Light Rail Projects.</p> <p>As set out by EIAR Chapter 26, Architectural Heritage, section 26.7, the dismantling, transportation, storage, conservation or repairs and reinstatement are to be carried out in accordance with the specification compiled by the MetroLink Project Conservation Architect and that the works, by specialist Heritage Works Contractor(s), are supervised by appropriately qualified professionals.</p> <p>As set out in response to Item 3 above the MetroLink Cultural Heritage Strategy (the current draft of which is provided in Appendix A25.1 of the EIAR) will be updated by the TII Project Archaeologist and MetroLink PCA team as agreed with TII and the now Minister for Housing, Local Government and Heritage (HLGH). Prior to commencement of removal and reinstatement works, TII will engage with relevant divisions of each Local Authority on the management and reinstatement of relevant elements of architectural and heritage interest.</p>