

A428 Black Cat to Caxton Gibbet improvements

**9.100 Joint Position Statement on methodology,
practicalities and the value of relocating Brook
Cottages**

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A428 Black Cat to Caxton Gibbet improvements

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9.100 Joint Position Statement on methodology, practicalities and
the value of relocating Brook Cottages

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**A428 Black Cat to Caxton Gibbet
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and the value of relocating Brook Cottages**

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1 Introduction

- 1.1.1 This Joint Position Statement (the Statement) has been produced to address Question 3.12.2.2 'Survey of Brook Cottages' of the Examining Authority's Third Written Questions **[PD-014]** which requires submission of a joint position statement between the Applicant, Historic England and Bedford Borough Council, on matters including but not limited to:
- a. Methodology of the survey.
 - b. The methodology and practicalities around the demolition and relocation of Brook Cottages.
 - c. Views on what would be a suitable relocation venue, shortlist of specific locations and progress on any conversations.
 - d. The value of the relocation, including in terms of the assessment and significance of effects in the Environmental Statement (ES).
 - e. Wording for Requirement 16 of the dDCO **[REP6-003]** concerning the demolition and potential reconstruction of Grade II listed Brook Cottages, including greater clarity.
- 1.1.2 The Applicant has accordingly prepared this Statement with the following interested parties:
- a. Historic England.
 - b. Bedford Borough Council.
- 1.1.3 The content of this Statement was initially developed by the Applicant and then shared with Historic England and Bedford Borough Council on **XX January 2022**, and subsequently formed the basis of discussions held on **XX January 2022**, the purpose of which was to confirm their respective positions on the matters set out in the Statement.
- 1.1.4 This Statement makes reference to Requirement 16 and the Brook Cottages Heritage Strategy. These two documents have been drafted by the Applicant in consultation with Historic England and Bedford Borough Council. The documents set out a process by which decisions on Brook Cottages will be made. The guiding principle, as advocated by Historic England and Bedford Borough Council, is that there will be a staged approach allowing appropriate time for decision making regarding the future of Brook Cottages. The strategy sets out the methodology for concurrent archaeological and condition surveys to be undertaken to inform on the heritage significance and structural condition of the building. The Requirement allows for a pause at this stage to enable discussions regarding the viability and suitability of relocating Brook Cottages to take place. The results of the surveys will influence the approach to dismantling, storage and transportation of the structure should relocation be deemed appropriate.
- 1.1.5 The positions of the Applicant, Historic England and Bedford Borough Council are set out in **Table 1-1**.

Table 1-1. Joint Position Statement between the Applicant, Historic England and Bedford Borough Council at Deadline 8 (14 January 2022)

The Applicant	Historic England	Bedford Borough Council
1. Methodology of the Survey		
<p>The Applicant has prepared a survey methodology for a staged approach to the survey, recording and dismantling of Brook Cottages, contained within the Brook Cottages Heritage Strategy. The Heritage Strategy is included in Annex A of this Joint Position Statement.</p> <p>The Heritage Strategy was shared with Historic England and Bedford Borough Council on 1st November 2021 . Comments made by both Historic England and Bedford Borough Council have been taken into account in preparation of the Heritage Strategy.</p>		<p>In agreement</p> <p>The Authority are content with the Methodology put forward in the Brook Cottages Heritage Strategy document provided that Historic England are content with the 35 day deadline referenced in section 5.3 (and 16 (3) of Requirement 16).</p>
2. The methodology and practicalities around the demolition and relocation of Brook Cottages		
<p>The Brook Cottages Heritage Strategy (included in Annex A of this Joint Position Statement) details the staged approach to survey, recording and dismantling Brook Cottages and, if considered viable, the transportation and relocation of Brook Cottages for reconstruction. The methodology for the dismantling and, if necessary, relocation of Brook Cottages will be informed by the results of the surveys</p>		<p>In agreement</p> <p>The Authority are content with the approach taken by the Applicant.</p>

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The Applicant	Historic England	Bedford Borough Council
<p>outlined within the Heritage Strategy, including the significance and heritage value of Brook Cottages given the extent of surviving historic fabric and the structural ability of the building to withstand dismantling, transportation and reconstruction..</p> <p>Until the outcome of the initial surveys and soft strip is known, it is not possible to confirm the preferred method for dismantling and, if necessary, relocation. The final decision will be made in consultation between the Applicant, Historic England and Bedford Borough Council</p>		
<p>3. Views on what would be a suitable relocation venue, shortlist of specific locations and progress on any conversations</p>		
<p>The Applicant considers that a suitable relocation venue for Brook Cottages, should it be capable of reconstruction, is in a museum setting.</p> <p>As set out in Appendix E of the Case for the Scheme [APP-240] the Applicant considers that relocation of Brook Cottages to a museum would afford greater opportunity to retain more of the building's heritage significance. It also provides greater opportunity to secure the building's future and provides additional public benefits.</p> <p>The Applicant has held positive discussions with the Museum of East Anglian Life. The museum has confirmed that it is willing, in</p>		<p>In agreement</p> <p>The Council accept that a museum setting, if possible, could be the most appropriate means of retaining the asset's significance. We can therefore support the pursuit of this option before any alternatives.</p> <p>Note: However, given that no concrete offer is currently in place from the Museum of East Anglian Life, it is imperative that alternative receptors are then considered, including those that may propose a different use (such as residential). Should the Museum drop all interest in taking on Brook Cottages, of if this</p>

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The Applicant		Historic England	Bedford Borough Council
<p>principle, to accept the building. However, this is subject to detailed discussions and terms yet to be agreed.</p> <p>The meetings that have taken place with the Museum of East Anglian to date are as follows:</p>			<p>use is not considered viable/suitable, the Applicant could not at that stage demonstrate that reconstruction is not appropriate without first undertaking a robust assessment of alternative locations and receptors. A museum is unlikely to be the only viable use of the asset, and the Authority consider that a residential use could be equally viable.</p>
Date	Correspondence/ Meeting		
2nd November 2020	Confirmation of interest in Brook Cottages from the Museum of East Anglian Life		
18 May 2021	Applicant and Museum of East Anglian Life – scheme overview meeting		
15 June 2021	Applicant and Museum of East Anglian Life – update meeting		
23rd June 2021	Museum of East Anglian Life visit to Brook Cottages		
21 July 2021	Applicant's visit to the Museum of East		

The Applicant	Historic England	Bedford Borough Council		
<table border="1"> <tr> <td data-bbox="190 328 472 384"></td> <td data-bbox="472 328 779 384">Anglian Life.</td> </tr> </table>		Anglian Life.		
	Anglian Life.			
<p>4. The value of the relocation, including in terms of the assessment and significance of effects in the ES</p>				
<p>The impact of the Scheme on Brook Cottages is reported in Chapter 6, Cultural Heritage [APP-075] of the Environmental Statement. The assessment has been undertaken on a worst case basis which is demolition of Brook Cottages.</p> <p>Paragraph 6.9.189 in Chapter 6, Cultural Heritage [APP-075] of the Environmental Statement sets out that the effect of the Scheme on Brook Cottages is large adverse. Mitigation has been identified as a Level 3 record of the building, which comprises an analytical written, drawn and photographic record of a historic building. Therefore, the proposed mitigation does not reduce the significance of effect.</p> <p>The relocation of Brook Cottages may provide value through enabling the retention of historic fabric. While this would not result in total loss of historic fabric it would still result in substantial harm in terms of the NPSNN.</p> <p>As such, the conclusions of Chapter 6, Cultural Heritage [APP-075] of the Environmental Statement will remain the same irrespective of whether it is viable to relocate Brook Cottages in due course.</p>		<p>In disagreement</p> <p>The Authority consider that public benefits would flow from the reconstruction of Brook Cottages over and above the total loss of significance resulting from its demolition. This could include heritage benefits, such as securing of its optimum viable use, revealing elements of its inherent heritage significance, reducing or removing risks to the asset or possibly securing its future as a designated heritage asset in support of its long-term conservation. Other economic, social and environmental benefits may flow from the relocation of the asset depending on the circumstances of its relocation and reuse.</p> <p>Should the outcome of the surveys reveal that the dismantling, storage, transportation and relocation of the asset would essentially amount to a total loss of significance, then it is likely that the Authority would not advise that relocation is viable or reasonable; as the public benefits (including heritage benefits) associated with its relocation would be severely limited when considering the costs incurred.</p> <p>This matter, which essentially relates to the justification for the Requirement, remains a point of disagreement between the Applicant</p>		

The Applicant	Historic England	Bedford Borough Council
		and the Authority. However, at this stage this point of disagreement is not considered to be of significant concern as the Applicant is willing to carry out the mitigation process.
<p>5. Wording for Requirement 16 of the dDCO [REP6-003] concerning the demolition and potential reconstruction of Grade II listed Brook Cottages, including greater clarity in terms of specific and detailed reasons that would prevent reconstruction and timescale and mechanism for demolition and reconstruction, if considered appropriate.</p>		
<p>The Applicant has prepared draft wording for Requirement 16, concerning the dismantling and, if viable, the potential reconstruction of Brook Cottages. The draft Requirement is included in Annex B of this Joint Position Statement. A flow chart which illustrates how the Requirement works in practice is included at Annex C.</p> <p>The draft Requirement has been drafted in consultation with Historic England and Bedford Borough Council and the current draft was shared with both parties on 23rd December 2021. Comments made by both Historic England and Bedford Borough Council have been taken into account in preparation of the draft Requirement.</p> <p>The draft Requirement includes a pause which would enable consideration of whether reconstruction would be appropriate in light of the condition and extent of the surviving historic fabric of Brook Cottages. Reasons which would prevent reconstruction include:</p> <ul style="list-style-type: none"> • There is limited survival of historic 		<p>In agreement</p> <p>The Authority are content with the wording of the Requirement.</p> <p>We would also add that the ‘pause’ referred to in section (6) of Requirement 16 would also facilitate the search for a suitable receptor and agree that no timeframe should be imposed on this to allow the Applicant time to consider all available options. In discussions, it was recommended that examples of what might prevent reconstruction (as per 6 (a)) are included in the Heritage Strategy document.</p>

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<p>fabric.</p> <ul style="list-style-type: none"> • The condition of structural elements would not withstand relocation, for example the timber-frame may be rotten. • The fabric cannot be dismantled without significant damage. • Hazardous materials are present within the building. <p>The mechanism for dismantling would be determined in light of these considerations, as outlined in the Brook Cottages Heritage Strategy.</p> <p>If relocation is appropriate, the draft Requirement requires the historic fabric to be dismantled and stored in a way which facilitates future reconstruction, pending approval by the Secretary of State of the and timescales and location for reconstruction.</p>		

2 Conclusion

2.1.1 To be added once reviewed by all parties

Annex A – Brook Cottages Heritage Strategy

Annex B – Requirement 16

Annex C – Requirement 16 Flowchart