Ms Rebecca Whitney  
South Cambridgeshire District Council  
South Cambridgeshire Hall  
Cambourne Business Park  
Cambourne  
Cambridge  
CB23 6EA  
24 May 2019  

Dear Ms Whitney  

Arrangements for Handling Heritage Applications Direction 2015  

GREAT EASTERN DRYING SHED, 163 HIGH STREET, SAWSTON, CB2 3HN  
Application No. S/1483/19/LB  

Thank you for your letter of 29 April 2019 regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.  

Summary  
The demolition of the Great Eastern Drying Shed at the Sawston Tannery would entail its complete destruction, and would result in what the National Planning Policy Framework (NPPF) terms substantial harm. The tests against which any proposal for total demolition must be considered are set out in the Framework and are, rightly, very high tests. Historic England have, together with your authority, been working to find a way to secure the future of the building for many years and this proposal for total demolition has been submitted following lengthy discussions. These have centred around the condition of the building, the options for its repair and the implications of this on the significance of the structure, the potential for the reuse of the building and the likelihood of achieving this. The application contains supporting information on these points. Historic England have given the application very careful consideration and while the loss of the building is clearly deeply regrettable, we do not object to the proposal.  

Historic England Advice  
The Great Eastern Drying Shed is a grade II* listed building. It is located within the wider Hutchings and Harding tannery site, which contains other listed buildings, which are each grade II. The tannery site forms part of the Sawston conservation area, a conservation area designated, at least in part, to recognise Sawston’s importance as one of Cambridgeshire’s few industrial villages. The tannery adjoins the grade II registered Sawston Hall garden and designed landscape.
As a building much of the significance of the Great Eastern Drying Shed arises from its exceptional scale and ambition for a purpose built tannery building. It is a tall, relatively narrow building with three timber-framed upper floors over an arcaded brick lower floor. It is almost 40 metres long by 6 metres deep. The timber-framed upper floors were originally all fitted with timber louvers, allowing cross ventilation to assist the drying of skins while excluding rain and sunlight. Many louvers are now missing, as are a considerable number of slates from the shallow-pitched hipped roof.

Tanneries were of crucial importance throughout the history of Britain, transforming animal hides to usable material for clothing, shoes, book and manuscript production and a wealth of other uses. Tanning at Sawston has a long history, relating to varied factors including the availability of land (tanning is a notoriously anti-social activity, often regulated against in towns with corporations), plentiful water and ready workforce. The existing Hutchings and Harding tannery site, of which the Great Eastern Drying Shed forms a part, has a history as a tannery that can be traced to the mid-seventeenth century.

The Great Eastern Drying Shed uses technology associated with earlier, smaller scale tannery drying sheds. Examples of this type of tannery building, typically with a masonry lower structure and a single timber framed upper floor for drying can be seen elsewhere on the Hutchings and Harding site, where they remain in use and some are listed buildings. In the Great Eastern Drying Shed the scale of the building was magnified, but the basic structural form was left largely unchanged. As a result, the structure of the upper floors is formed of undersized timbers, and structural weakness appears to have been evident since construction, as is shown by the additional braces and secondary structure, including props, that have been added.

The Great Eastern Drying Shed is the largest example of its building type recorded. It was apparently constructed in the mid-nineteenth century when competition between two rival tanneries at Sawston might have inspired this scale of construction for reasons of prestige as well as production purposes. It is primarily exceptional as a result of its size, with three timber framed drying floors over an arcaded brick-built lower floor that contained steeping tanks, than for any technical innovation or unique feature.

The basic form of the structure can be observed on other nineteenth century tannery buildings elsewhere on the Sawston tannery site, if on a much smaller scale. The significance of the tannery group as a whole, and its contribution to the wider conservation area, is considerable.

The total demolition of the Great Eastern Drying Shed, including the upper timber framed structure and the brick built arcaded lower floor, would completely remove the significance of the listed building. Such a demolition would cause substantial harm as defined in the NPPF. The building would be lost, and the wider group of historic
Tannery buildings would have a reduced significance as a result. The contribution that the building makes to the Sawston conservation area would also be lost, reducing the significance of the conservation area. In the case of the impact on the significance of the group of listed structures at the tannery, and to the conservation area, the harm would be less than substantial.

As the application affects a listed building, the statutory requirement to have special regard to the desirability of preserving the building, its setting and any features of special interest (ss.16, 62, 1990 Planning (Listed Buildings and Conservation Areas) Act) must be taken into account by your authority when making its decision.

The NPPF’s historic environment policies require local planning authorities to take account of the desirability of sustaining and enhancing heritage assets and notes the positive contribution conservation can make to sustainable communities and the desirability of new development making a positive contribution to local character and distinctiveness. Heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 184).

As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a listed building should be exceptional (paragraph 194), and substantial harm or loss to assets of the highest significance should be wholly exceptional.

Paragraph 195 deals with proposals which will lead to substantial harm or total loss, stating that local planning authorities should refuse consent unless it can be demonstrated that:

- the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh the loss

or that all of the following apply:

- the nature of the heritage asset prevents all reasonable use; and

- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

- conservation by grant funding or some form of charitable or public trust ownership is demonstrably not possible; and

- the harm or loss is outweighed by the benefits of bringing the site back into use.
The importance of the building and the threat to it has been given prominence by its high grading of listing, and inclusion on the Heritage at Risk (HAR) register. There have been extensive discussions over many years to try to secure the repair of the building and safeguard its future. The strategy agreed between the owners, your authority and Historic England in 2016 resulted in the scaffolding of the building with grant from Historic England. This secured the structure, made the site safer and allowed for a fuller inspection of the building and further consideration of both its repair and options for reuse. The documentation we advised should be provided in order to carry out this exercise has been submitted with the application. The building has been vacant since 1976 and under-used for a considerably longer period. It is in an extremely vulnerable condition and is only being prevented from collapse by the scaffold. The submitted reports show that very substantial dismantling and reconstruction would be necessary to repair the building. If this were undertaken, negligible heritage significance would remain and the loss of significance (as defined in the NPPF) would remain substantial, albeit not as great as that should the building be demolished.

If the building were to be repaired it would require a use in order to give it a sustainable future. This would necessitate greater intervention, further affecting the significance of the building. Marketing advice indicates that only the ground and first floors might achieve a commercial rent. The position of the building within a working tannery site also presents challenges for its reuse.

The Framework provides a series of tests against which proposals for total demolition should be considered. These are considered below:

Historic England consider that there does not appear to be an imminent risk to public safety such as to agree to demolition immediately for public safety reasons. Protection is currently offered by regular maintenance of the existing security fence, and inspection of the scaffolding. However, these are dependent upon public funds from Historic England, as part of the agreed 2016 strategy. Such funding cannot be made available indefinitely in the absence of any viable option to return the building to an appropriate and self-sustaining use.

In terms of the four tests set out in the second half of paragraph 195:

the nature of the heritage asset prevents all reasonable use

The current condition of the building, and resultant health and safety concerns, rule out reuse in its current state. Even if repaired, marketing advice set out above indicates limited use could be achieved and the rent would be likely to need to be very heavily discounted given the form of the building and difficulties of access.
no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation

The reports considering repair of the existing structure, which accompany the current application, make it clear that a very considerable conservation deficit exists in bringing the structure back into repair. Even if repaired, the Great Eastern Drying Shed would have only restricted usefulness, due to low floor heights and lightweight structural form. As already noted, only the ground and first floors would be lettable. Issues of access and parking would be difficult to address on the already congested working tannery site. Marketing advice contained within the application convincingly argues that there is little or no need for the type of accommodation that a repaired Great Eastern Drying Shed would provide within the local market, at least in the short or medium term.

conservation by grant funding or some form of charitable or public trust ownership is demonstrably not possible

The levels of intervention and replication identified as part of the 2016 report would have a considerable impact on the integrity and interest of the historic structure. Works to adapt or reconstruct the building to fit it for a new use would only further increase this. Given the negligible heritage interest that a restored Great Eastern Drying Shed would therefore have, it is highly unlikely that any form of grant or charitable funding would be obtainable. Even if such funding were available, it has been argued that little of heritage interest would be saveable. The potential transfer of the building to a local community group or charity has been explored and despite limited interest, no viable project was put forward.

the harm or loss is outweighed by the benefits of bringing the site back into use.

The site of the Great Eastern Drying Shed is a relatively small part of a wider operational tannery. There are currently no active proposals for reuse of the site, although the tannery operators have indicated that the cleared area of site would be useful for storage. No case has been made that this storage cannot be achieved elsewhere on their site. As the application is not accompanied by a planning proposal for a new use, this test cannot be said to have been met.

Historic England consider justification for substantial harm or complete loss, in line with the requirements of the Framework, has been largely, but not fully, made either indirectly or negated by the fact the repair of the building would not be achievable without causing substantial harm. In the absence of a scheme to redevelop the site, the fourth test remains unanswered.

In sum, the building is in extremely poor condition and its repair would entail the extensive replacement of the historic fabric which would largely remove its
significance. Even if repair was achievable, in order to secure a new use to give the building a sustainable future it would require further adaptation which again would affect the interest of the building. The location of the structure on the existing tannery site creates further challenges to securing a new use. The cost of these repairs and conversion works would be considerable and no viable option for achieving this has been forthcoming. While it is for your authority to consider the proposals against the very high test for demolition set out in the Framework and come to a decision, we consider that in these circumstances, exceptionally, the relevant tests have in effect been met.

The potential option of retaining the masonry base of the structure has not been explored. Structurally this is the more stable part of the building and there may be more scope to retain this element. While this approach would still result in substantial harm, the retention of the lower section would provide a reference to the existence and scale of the tannery. Your authority may wish to explore this further with the applicant.

**Recommendation**

Historic England consider the loss of the Great Eastern Drying Shed would be deeply regrettable. However, after lengthy exploration of the options to secure the future of the building we have come to the view that in this exceptional case, the building is beyond reasonable repair. Your authority may however wish to explore the retention of the masonry base. If you do consider the case has been made for demolition, you should ensure an appropriate record is made prior to demolition.

Yours sincerely