



Heritage Statement

New Mills, Marsden

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1.0 Introduction

Purpose of the report

- 1.1 This report has been prepared by Bowman Riley on behalf of 'Philip Crowther' to accompany an application for planning permission for works to New Mills, Marsden, HD7 6AZ.
- 1.2 New Mills is a collection of buildings constructed for woollen production located in Marsden, Huddersfield and is located within the Marsden conservation area.
- 1.3 It has been prepared by Robert Sharples and overseen by Joanne Harrison RIBA AssocIHBC and Helen Walker RIBA CA. Robert Sharples is a RIBA registered architect and conservation registrant. Covering most sectors, he has a broad experience producing relevant material and working with heritage related projects.
- 1.4 Joanne Harrison is an architect who is researching her PhD in historic building conservation. She has a particular interest in industrial heritage. Helen Walker is a RIBA registered Conservation Architect with over 10 years' experience of working with heritage assets. Helen's role is to primarily provide an overarching view of the heritage projects within the practice. Helen has experience of working with a wide variety of heritage assets including Grade I, II* and II listed buildings as well as battlefields, scheduled ancient monuments and conservation areas. She has a broad range of experience including preparation of Heritage Impact Assessments, Quinquennial Inspections and advice on historic building repairs and identification of defects and has provided heritage advice to local authorities, private clients, and organisations such as the National Trust.

Sources

- 1.5 This report has been informed by a site visit, a review of online primary and secondary source material relating to the site, historic maps and the Marsden conservation area appraisal.

2.0 Planning Policy

NPPF

2.1 National Planning Policy Framework (NPPF)¹ identifies the Government’s planning policies and how they should be applied in practice. They are used by Local Planning Authorities when preparing their development plans and is a material consideration in determining planning applications. Section 16 of the NPPF provides guidance on conserving and enhancing the historic environment and the decision-making process in relation to heritage assets.

2.2 This Statement of Significance has been prepared in accordance with the requirement under paragraph 207 of the NPPF which requires the applicant to:

“...describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”

2.3 The NPPF defines Significance as:

“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting...”

2.4 The statement of significance and impact assessment then enables the Local Planning Authority to assess the application in accordance with Paragraph 208 of the NPPF which states:

“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”

2.5 New development in conservation areas should seek to enhance or better reveal the special historic nature of the area in accordance with Paragraph 219 of the NPPF:

“Local Planning Authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

2.6 The NPPF requires that the effect of development on the significance of a non-designated heritage asset to be taken into consideration when determining applications

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

2.7 This document has been prepared in accordance with Historic England’s “Conservation Principles Policies and Guidance for the sustainable management for the historic environment.” This publication advises that the development of the proposals for works to a heritage asset should be informed by an overarching understanding of the significance:

“In summary, what is needed is an impartial analysis of significance and the contribution of setting. A Statement of Heritage Significance is not an advocacy document, seeking to justify a scheme which has already been designed; it is more an objective analysis of significance, an opportunity to describe what matters and why, in terms of heritage significance.”

¹ MHCLG, National Planning Policy Framework. <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 2.8 It is only by understanding significance that we can begin to understand the impact of any proposed change to that heritage asset.
- 2.9 The NPPF indicates that when assessing impact, great weight should be given to the asset’s conservation and that this should be proportionate to the importance of the asset.
- 2.10 Significance can be harmed not just by a material change to the asset but also to its setting which can be of great value to the significance. If the proposal is deemed to cause harm to the asset, a robust justification will need to be presented to and assessed by the local planning authority. The NPPF defines the setting of a heritage asset to be:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”

- 2.11 If the development will lead to substantial harm, paragraph 214 indicates that the development should be refused consent by the local planning authority, unless it can be proved that the loss or damage to the asset can be outweighed by substantial benefits to the public OR if the proposal can demonstrate all of the following:

*“the nature of the heritage asset prevents all reasonable uses of the site; 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 ownership is demonstrably not possible; and
the harm or loss is outweighed by the benefit of bringing the site back into use.”*

- 2.12 If the development leads to less than substantial harm, paragraph 215 indicates that this harm still needs to be assessed against the public benefit of the scheme and whether the viability of the site is being optimised.
- 2.13 In the case of sites which have the potential to contain archaeological finds, the NPPF advises that the developers of the site submit an appropriate desk-based assessment, and where necessary, a field evaluation.
- 2.14 This statement has assessed the level of harm to the conservation area in accordance with the NPPF paragraph 208 which states:

“Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.”

Local UDP / framework policies

- 2.15 Relevant Unitary Development Plan (UDP)² polices relating to general design, listed buildings and conservation areas include BE1, BE2, BE5, BE6 and BE11.
- 2.16 Of particular relevance is BE5 which states:

PROPOSALS FOR NEW DEVELOPMENT WITHIN CONSERVATION AREAS, INCLUDING EXTENSIONS OR CHANGES OF USE TO EXISTING BUILDINGS, SHOULD RESPECT THE ARCHITECTURAL QUALITIES OF SURROUNDING BUILDINGS AND THEIR MATERIALS OF CONSTRUCTION, AND CONTRIBUTE TO THE PRESERVATION OR ENHANCEMENT OF THE CHARACTER OR APPEARANCE OF THE AREA.

² Kirklees Council, Kirklees Unitary Development Plan 2007.

2.17 Spaces between buildings are as important as the buildings themselves in the built environment. New development in conservation areas must be considered not only on the basis of how it affects the setting of existing buildings, but how it affects their overall density, and consequently whether the character of the area will be adversely affected. Thus, whilst infill sites may exist within conservation areas, it cannot be assumed that all will be able to be developed.

2.18 In addition, BE11 requires:

NEW DEVELOPMENT SHOULD BE CONSTRUCTED IN NATURAL STONE OF A SIMILAR COLOUR AND TEXTURE TO THAT PREVAILING IN THE AREA WHERE THE PROPOSAL IS LOCATED:

i IN AREAS WITHIN WHICH STONE HAS BEEN THE PREDOMINANT MATERIAL OF CONSTRUCTION;

ii WITHIN CONSERVATION AREAS; AND

iii WITHIN TOWN AND LOCAL CENTRES.

2.19 The Marsden conservation area appraisal states New Mills and Bank Bottom Mills are ideal candidates for heritage-led regeneration and a number of potentially sustainable uses have been considered. On completion, this could act as a catalyst for further regeneration due to their central location.³

[Previous applications on the site](#)

2.20 The following planning applications have previously been approved at the property (excluding work to trees):

- Application Ref.No.2005/93716 Demolition of 3 bay mill, spinning shed and garage, erection of health care unit and conversion of 2 bay mill to lettable ground floor units for associated health care / office units / gym / restaurant and wine bar and 32no. apartments on 3rd and 4th floors with associated car parking (within a conservation area) | Conditional Full Permission | 24th August 2006
- Application Ref.No.2005/93717 Conservation Area Consent for demolition of 3 bay mill and spinning shed | Conservation Area consent granted | 24th August 2006

2.21 This proposal included significant demolition of areas to the west towards Peel Street.

³ Marsden Conservation Area Appraisal, p.39.

3.0 Methodology

Assessing heritage value

- 3.1 To understand the significance of the heritage asset, it is necessary to first understand the perceived heritage value which contributes to that significance. In accordance with Historic England's Statements of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12⁴, these heritage values have been arranged into three groups:

Archaeological:	There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
Architectural & artistic:	These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
Historic:	An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

⁴ Statements of Heritage Significance: Analysing Significance in Heritage Assets. <https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12>

Assessing the significance of this value

3.2 Once the interest has been ascertained, the level of contribution the interest makes to the heritage significance of the asset can then be determined and used to guide the development of the scheme. This level of significance has been classified as follows:

- Negligible: The element provides little or no contribution to the heritage asset.
- Slight: The element provides some contribution to the heritage asset but not to the extent that any alteration will cause harm.
- Moderate: The element is important to the significance of the asset and requires assessment with the assumption that any harm will be less than substantial and can be mitigated.
- High: The element is very important to the significance of the asset and careful consideration is required to assess if the harm is substantial or less than substantial and whether the harm can be mitigated.
- Considerable: The element is essential to our understanding of the significance of the heritage asset with the assumption that any harm to that element would be constitute substantial harm to the heritage asset and would require full justification.

Assessing the Impact of specific works

- 3.3 The level of harm to the significance of the heritage can then be assessed by understanding the impact of undertaking the works and can be substantial harm, less than substantial harm or no harm.
- 3.4 This impact is assessed as potential and final and considers the options for mitigation and public benefit.
- 3.5 To provide a succinct and accessible summation of the impact to the significance of the heritage asset, the impact has been displayed in table form as per the example below with a summary as part of the conclusion:

Element	Level of significance	Alteration	What is the potential impact	What is the need for change	Options for mitigation / enhancement	Can the harm be mitigated against public benefit	Final Impact
Walls	High & Moderate	Form openings	Less than substantial harm	Fire doors are required for escape in the event of fire	New doors have clearly been identified as modern insertions and escape routes have been designed to have the least impact	Insertion of these doors is required to protect life in the event of a fire and will allow this building to be brought back into use	Less than substantial harm

4.0 History of Marsden

- 4.1 Marsden is a large village in Kirklees, West Yorkshire, and is located 7 miles west of Huddersfield. Marsden is in the Colne Valley in the south Pennines, the name taken from the River Colne which runs East towards Huddersfield, and includes other towns and villages such as the nearby Slaithwaite.
- 4.2 Marsden's built environment is predominately to the South of the railway and canal which runs East to West. Marsden is recognised for Marsden Moor, now within the remit of the National Trust, which is a vast moorland of 600 acres, a site of special scientific interest and is considered a special area of conservation.
- 4.3 Marsden Conservation Area Appraisal notes the development of the Marsden settlement has been organic and has grown from a number of scattered groups of homesteads and outlying farms to a 19th century closely knit industrial mill town of picturesque quality.⁵ The site, New Mills, is located within.

Early development

- 4.4 The Marsden conservation area appraisal discusses the origin and development of Marsden, including its archaeology.⁶ From the broad context of Marsden, it appears that there is potential for finds relating to early hunting grounds and of Roman passage and activity, however, none are recorded within the conservation area. The appraisal suggests that early settlement comprised scattered groups of homesteads and outlying farms, with local inhabitants farming the land and grazing sheep on the hillsides and moors.
- 4.5 By the medieval period, the appraisal states, at the time of the Hearth Tax (1666) approximately 550 people and 82 houses were recorded in Marsden.⁷ In the 18th century Marsden saw an increase in trade between Huddersfield and Manchester, and this led development of areas such as Towngate to accommodate transportation infrastructure such as new turnpikes.

19th Century

- 4.6 The Colne Valley played an important role in the industrial revolution in Yorkshire. Mills to produce woollen cloth were becoming established, utilising the river as a source, and transport links were expanded to support development, technological innovation, and a growing economy. The Marsden Conservation Area appraisal⁸ states that the canal construction was completed in 1812 and the railway in 1845.
- 4.7 In Marsden, the woollen industry increased employment. The construction of the mills had a profound impact on the largely rural landscape⁹ and there was a disproportionate number of industrial buildings compared to the population. An online resource¹⁰ explores the Yorkshire industrial heritage and a map of ten textile mills in the Marsden area.
- 4.8 Comparing the 1854¹¹ OS map to the later 19th century OS map provides evidence of the industrial transformation of Marsden with the introduction of, and/or significant alterations, to mills present on later maps. These, however, show different names, scales and block layouts; for example, Upper End Mill became Warehouse Hill Mills.
- 4.9 During this period, Marsden's centre around Towngate and Market Place had the same general arrangement but with further development, especially along Peel Street and further housing along Brougham Road. As the town made progress and the population increased, more provision and amenities developed. The Grade II Marsden Mechanics Hall (MMH) built in 1860 was central to the town and the

⁵ Marsden conservation area appraisal, p.1.

⁶ Marsden conservation area appraisal

⁷ Marsden conservation area appraisal, p.7.

⁸ <https://www.kirklees.gov.uk/beta/trees-listing-and-conservation/pdf/conservation-appraisals/Marsden.pdf>

⁹ Marsden conservation area appraisal, p.7.

¹⁰ <https://yorkshire.u08.eu/marsden/>

¹¹ <https://maps.nls.uk/view/102345088>

Head Quarters of the Marsden Mechanics Institute was founded by local employers to provide betterment for the workers. Derby Terrace was constructed by 1892.

- 4.10 Comparing the 1892¹² and 1894¹³ maps with the early 1900s OS maps indicates significant expansion in the footprint of the mills present in Marsden and to the South at this time. This includes the change between Wessenden Brook (which runs under Bank Bottom Mills) in the forming of Butterley Reservoir and transport development. The 1894 OS map clearly shows how the location of each mill relates primarily to a source of water.
- 4.11 The junction of Peel Street and Brougham Road is located at the centre of Marsden village adjacent to the New Mills site. This immediate area saw significant transformation at the turn of the 19th century. A row of new buildings with active shop fronts facing Peel Steet were constructed. There is evidence of buildings being replaced with grander buildings or enhanced, in the case of the MMH with an additional tower. The OS Maps and photos also suggest Snail Horn bridge was made wider along with part of Peel Street.
- 4.12 Research of an historic photograph archive evidences the following;
- a. [Old Market Place](#) in 1890 facing north (prior to Peel Street block).
 - b. [Old coop](#), since replaced, dated 1880 however shows an infill compared to photo a above so likely later.
 - c. [Brougham Road](#) taken in 1879, prior to Derby Terrace being constructed, with the MMH before its later painted clock tower was constructed, and the adjacent Methodist Church which is longer present.
 - d. [Swan Inn, Buckley Hill, Marsden Congregational church, row of tenterposts and Snail Horn bridge](#) c.1880-1890.
 - e. [Peel Street](#) from 1900, showing the transformation of Peel Street and Snail Horn bridge.
 - f. The [Church](#) following its extension in the 1930s - compare with d. and e.
 - g. [Peel Street](#), active and with a bank, in the 1930s - compare with a. and b.
- 4.13 The position of the Mechanics Institute and the former row (as per item g) photo showing the appearance of Brougham Road before Derby Terrace was built), suggests that development of more civic or public buildings could have been planned. The clock tower adds to this pivot point in the village.
- 4.14 Lower Peel Street was potentially the historic edge of the Old Mill or site for amenity and source of water: item a) photo shows this part of the site facing North, including Snail Horn Hill and tenter posts (no longer present) and item g) photos show the appearance of Brougham Road before Derby Terrace was built.

20th Century

- 4.15 Aerial photograph 1¹⁴ and photograph 2¹⁵ from 1926 show Marsden from the Southwest and West respectively, St. Bartholomew church being a useful point of navigation. Comparing development from 1906¹⁶ and 1908¹⁷ OS to the 1932 OS map¹⁸ shows there was an expansion of the built environment that included rows of housing and changes to the various mills. Clough Lee Mills, New Mills, Bank Bottom Mills, Fall Lane Mills expanded, the site of Ready Carr Mills became Marsden Iron Foundry, and the Warehouse

¹² <https://maps.nls.uk/view/125647278>

¹³ <https://maps.nls.uk/view/125647278>

¹⁴ <https://www.britainfromabove.org.uk/en/image/EPW016154>

¹⁵ <https://www.britainfromabove.org.uk/en/image/EPW016152>

¹⁶ <https://maps.nls.uk/view/125647281>

¹⁷ <https://maps.nls.uk/view/100948655>

¹⁸ <https://maps.nls.uk/view/125647284>

Hill Mills became disused. Overall, there was a marked growth in the industry for woollen production in Marsden which suggests woollen production was thriving, and population and employment was increasing.

- 4.16 The 1932¹⁹ OS map best identifies several mills located in Marsden at that time. This includes New Mills, Warehouse Hill Mills (disused), and Wood Bottom Mills to the East, Clough Lee Mills to the West, Fall Lane Mills, Ready Carr Mills, Marsden Mills, and Bank Bottom Mills to the South. The OS map shows Bank Bottom Mill to have a significant footprint. This mill ceased production in 2003, having been home to John Edward Crowther Ltd, formerly one of the largest mills in Yorkshire. The Crowthers moved to Marsden in 1876, beginning a long and profitable association with cloth manufacturing in the town.²⁰
- 4.17 An aerial photograph²¹ from 1946 shows Marsden from the northeast. The photo highlights the historic development of the village in relationship to the landscape such as the river Colne and the moorland, the train station to the North (right of the photo), the road from Huddersfield towards Oldham, now Manchester Road, and Mount Road (left of the photo) leading to the now Butterley Reservoir. The photo also places various mill buildings in context, such as New Mills in the centre of the village. The 1949²² OS map supports the findings of the photograph. It also shows a prominent chimney and building on Warehouse Hill Road which are no longer present.
- 4.18 Comparing the 1955²³ OS map to present day indicates more recent development and major changes such as the demolition of the gas tower and Clough Lee mill. There are several images showing the 20th century development of Marsden, including an aerial [photo](#) from 1920, a [photo](#) from 1950, and a further [photo](#) from the early 1990s facing South.

¹⁹ <https://maps.nls.uk/view/125647284>

²⁰ <https://yorkshire.u08.eu/marsden/>

²¹ <https://www.britainfromabove.org.uk/en/image/EAW002554>

²² <https://maps.nls.uk/view/100948652>

²³ <https://maps.nls.uk/view/91788772>

5.0 History of New Mills

The site

5.1 New Mills is located between Warehouse Hill Road to the north, Crowther Bruce Mill Road to the East, Brougham Road to the South. Derby Terrace (as noted above) and Peel Street are to the West towards the centre of Marsden. The River Colne flows under the building(s) and site. The conservation area appraisal states:

“New Mills are an extensive group of stone buildings rising four storeys in height from a single storey position. They have some fine detailing while interesting footbridges link the high-rise elements at 1st, 2nd and 3rd floor levels. Looking toward the mills from Peel Street the mass and scale of the buildings can be observed. Their impact on the predominantly rural character of Marsden would have been phenomenal. The main block is five storeys high and constructed from local stone with a shallow pitch roof. The back-to-back properties known as Derby Terrace (1879) lie to the north of Brougham Road and form a positive enhancement to the streetscape of this area. The central tower is a focal point and a local landmark.”²⁴

- 5.2 There is no clear illustration of historic use of any building or setting i.e., mid-19th century or before on the site. This means there is no direct relationship with the Luddites.²⁵
- 5.3 The historic maps for 1854 and 1892 suggest significant changes were made to the built environment in the late 19th century. The 1854 map notes two woollen mills on the site - The Old Corn Mill and Frank Mill – and shows large areas of water for the mill(s), some of which remained in 1892. Along the river line, there was one block that was possibly extended to provide a bigger footprint, described as Old Mills.
- 5.4 There was another single footprint called New Mills which may have absorbed an arc of buildings that partially occupied the site, however this is unlikely given the name. Frank Mill does not feature on the 1892 OS map. A new I-shaped block was erected on Brougham Road during this time. This, along with changes at other mills, suggests a trend towards the transformation of small mills into large mills in Marsden during the 19th century.
- 5.5 The 1892 and 1932 maps show that considerable change occurred during this period. The Warehouse Hill Mills, said to be silk and woollen and then later woollen only, became disused and the mill pond, or lakeside were no longer present. A waterfall and additional mill buildings were created to the Northeast part of the site and two large blocks were formed, split with a central access, and linked with what appears to be the bridge links.
- 5.6 Research of an historic photograph archive evidences;
- a. a [photo](#) of Warehouse Hill from 1895-1905 with the row of 10 Tenter Posts near New Mills.
 - b. [photo 1](#) and [photo 2](#) of Marsden Congregational Church showing tenting (no longer present) in foreground, from different dates but both late 19th century.
 - c. a [photo](#) of the village centre from Old Mount Road, date unknown, the Mechanics Institute does not have a tower, suggesting late 19th century.
 - d. a [photo](#) view of Marsden c.1900 showing the old arrangement of New Mills to the right.
 - e. a [photo](#) from the 1920s of the Warehouse Hill and Lakeside, with the ten tenter posts and silk mill on the right.

²⁴ Marsden conservation area appraisal, p.18.

²⁵ Luddites were well-trained middle-class textile workers and weavers of their time, who, *after working for centuries maintaining good relationships with merchants who sold their products, the introduction of machinery not only superseded the need for handcrafted garments but also initiated the use of low skilled and poorly paid labourers in large factories.* <https://www.historic-uk.com/HistoryUK/HistoryofBritain/The-Luddites/>

- f. a [photo](#) of Marsden Infant School from 1930 shows New Mills in the background, changes to the south side of Brougham Road were considerable from the late 19th century to this date.
- 5.7 An aerial [photo](#) from the 1950 shows the entirety of New Mill with the construction of the Dirker council estate to the right. It shows Warehouse Hill, the infill over the river and lakeside of Warehouse Hill Mills.
- 5.8 Multiple sources suggest there was a chimney with the cluster of buildings on the New Mills site; chimney 1 was present on the 1892 OS map and demolished before 1946, and chimney 2 on the opposite side of Warehouse Mills Road, was built after 1908 and before 1926, and demolished after the 1990s. The 1926 photo shows both chimneys and a photo from the 1990s shows chimney 2 with an infrastructural link across the Warehouse Mill Road.
- 5.9 The mill most recently operated 20th century technology, benefitting from advancements in mechanised equipment.

Crowther family

- 5.10 The Marsden conservation area appraisal provides the historic patronage of Marsden and describes the influence of The Crowther family, of which there was Joseph, William, Elon and John Edward. John Edward (1863-1931) was the most influential in terms of constructing some of the largest mills in the town, and the world. Bank Bottom Mills is one such example. The appraisal notes a successful partnership between John Edward and Joseph at one stage, and later, John Edward referred to his business interest as Marsden Mill Co. Ltd, which continued to expand with mills at Fall Lane, Ready Carr and New Mill and employed over 2000 people.²⁶
- 5.11 New Mill was part of the firm of J.E. Crowther and Sons and known as Colne Valley Spinning Co. New Mill or Crowther and Bruce was founded in 1897 and had the distinction of being one of five large Mills that took over from the home-based or luddite industries of the 19th century. Manufacturing woollen cloth, the name apparently derives from an old mill that was situated on the site prior to the construction of the Crowther Bruce Mill.²⁷ The reference to Crowther Bruce and Co Ltd appears to lose reference - J.E. Crowther sadly ended his life in 1931. New Mills closed in 2002.
- 5.12 Research of an historic photograph collection highlights snippets of the social history of New Mills: Photographs [1](#) [2](#) and [3](#) for example, show a Crowther's Mill trip c.1952; photos 1 and 2 are of a trip to Blackpool by train and confirm the company names and dates - John Edward Crowther Limited, Colne Valley Spinning Co., and 1910 and 1951.

²⁶ Marsden Conservation Area Appraisal, p.11.

²⁷ <https://www.28dayslater.co.uk/threads/the-mills-of-marsden-yorkshire-july-2019.118920/>

6.0 Extant site and buildings

Heritage assets - context

- 6.1 The Historic Environment Record (HER) search shows there are a few Historic England references and buildings on the national heritage list for England local to the site, 10 Tenter Posts (Grade II, HE Ref. 1221739) and the Mechanics Institute (Grade II, HE Ref. 1274926, Hob Uid 1306303). Furthermore, at the gateway of Peel Street is The New Inn (HE Ref. 1275323) and Ingfield House (HE Ref. 1217286).
- 6.2 The West Yorkshire Archaeological Advice Service (WYAAS) and HER records both identified local to the site, Derby Terrace (HE Hob Uid. 517656, WYHER MWY7850), New Mills (HE Hob Uid. 945259, WYHER No. MWY5243), Warehouse Hill Mills or Upper End Mill, Tenter ground and tenter posts (HE Hob Uid. 945258, WYHER MWY5172).
- 6.3 At the top of Brougham Road is Green Bower (HE Hob Uid. 51754, WYHER MWY7861) which is a row of Georgian terrace houses. Along Manchester Road to the south of the site is Inner Hey (HE Ref. 1275471, WYHER MWY7866), and the 7 miles post (Grade II HE Ref. 1217291) which has been listed with The Historic Milestone Society.
- 6.4 The Marsden conservation area appraisal includes two maps: the location of the new / proposed conservation area (Figure 1) and the existing boundary (Figure 2). The new conservation area boundary extends to include more of Brougham Road. The extension includes terraced workers' housing associated with the growth of industry and these make a positive contribution to the area.

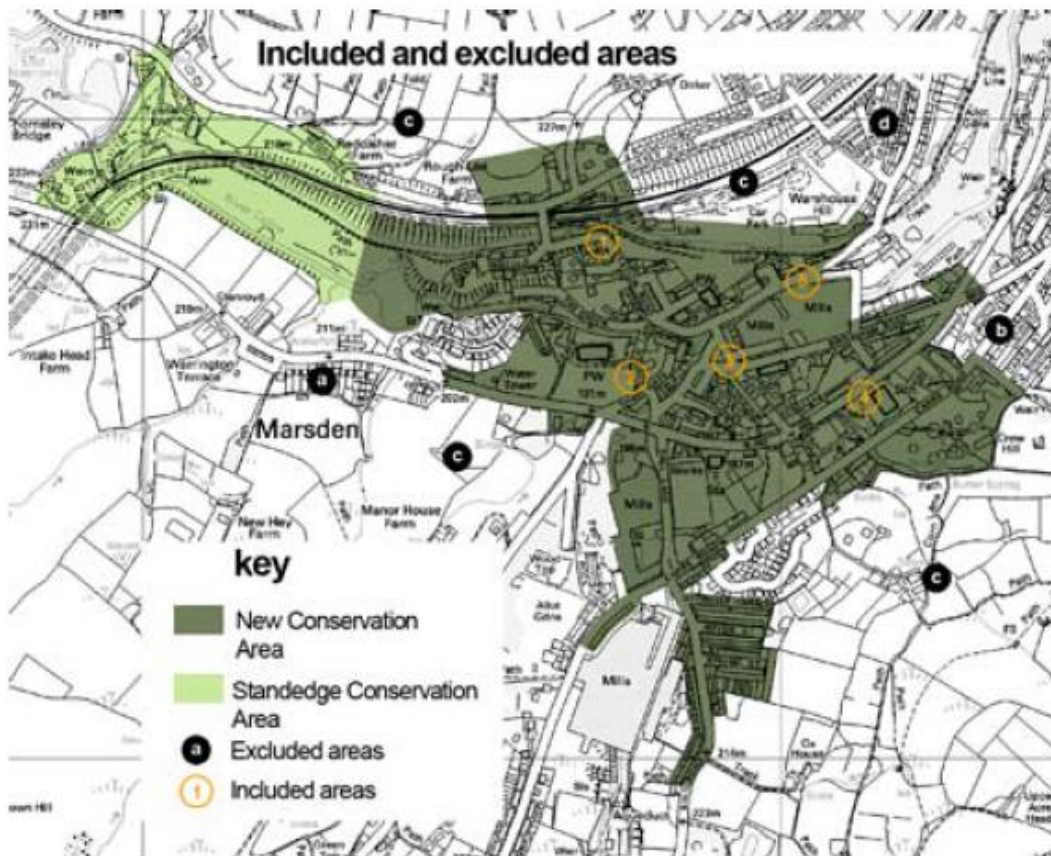


Figure 1 Marsden area map.²⁸

²⁸ Marsden conservation area appraisal.

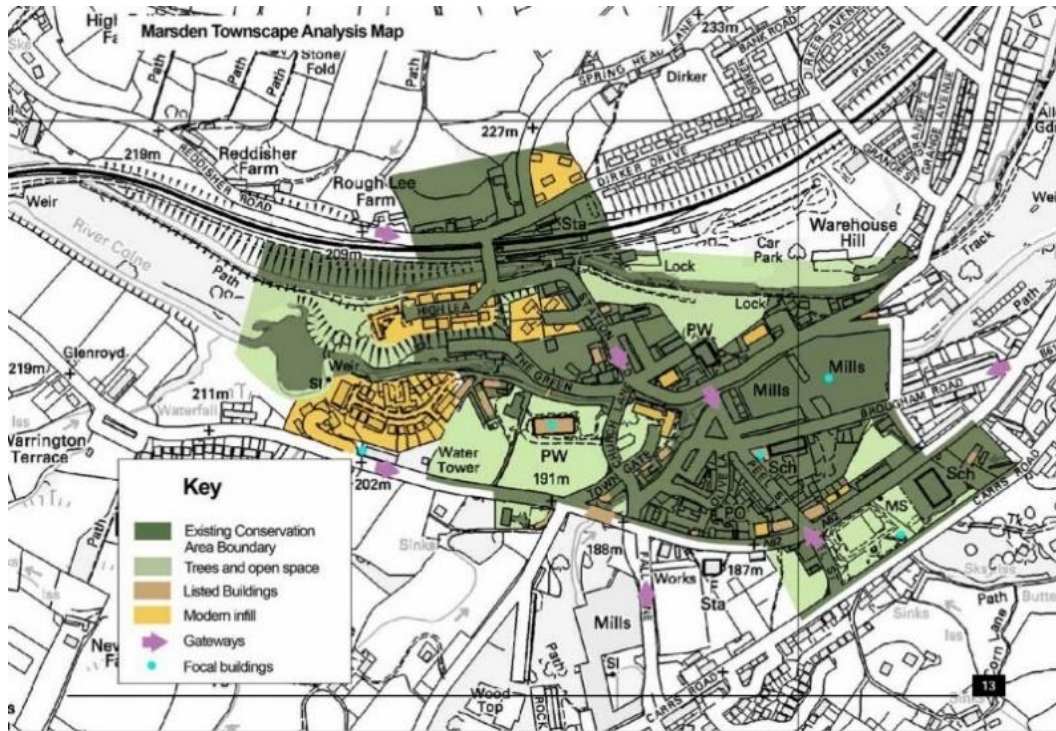


Figure 2 Marsden townscape analysis map.²⁹

6.5 The appraisal outlines that Brougham Road is a historic street with a uniform building line. This is framed by Derby Terrace and New Mills and culminates as the industrial landscape meets the natural landscape at the horizon.³⁰ It highlights several areas of special interest in the conservation area (designated in 1974):

- 1 The station, Station Road the Huddersfield Narrow Canal, and the River Colne
- 2 Towngate and St. Bartholomew's Church
- 3 Peel Street
- 4 The Park, Carrs Road and Manchester Road
- 5 New Mills and Brougham Road

6.6 The appraisal describes and indicates vehicular and pedestrian gateway views on the map. It also describes key views with some focus on the valley context of Marsden; views include Marsden from the Green Bower, the approach of the Mechanics Institute and the tower of New Mills, and the latter, along with connecting walkways are described as a focal point on the landscape. The 1906 datestone at the entrance of New Mills is identified as a notable historic street feature. New Mills is recognised as a key unlisted building / building of merit and the taller tower is described as a locally significant landmark. The site opposite New Mills is an informal open site that is disused.

6.7 A detailed review of the evidence suggests that the appraisal could be updated. For example:

- there is more modern infill in Character area 5 than shown on the analysis, which adds to the contrast of industrial and residential.
- there is greater overlap with Peel Street and Derby Terrace located on Brougham Road than the appraisal suggests.

²⁹ Marsden conservation area appraisal.

³⁰ Marsden conservation area appraisal, p.24.

- the original school was rebuilt in the late 19th century, and the adjacent site – the former Wesleyan Church – has now been used to extend the school building. It should be regarded as modern infill.
- the junction where the Mechanics Institute is located provides a vista towards New Mills yet historically, this junction was the Old Marketplace and there were fewer buildings until the late 19th century (see above photos). This is contrary to the appraisal, which suggests the developed improvement on Peel Street is mid-19th century.

6.8 Most of the New Mills buildings are low-level, wrapping around the taller buildings, giving the site no permeability and a distinct quality within the conservation area. The large footprint contrasts with development in the immediate surroundings though the mill buildings are an important part of Marsden's character. However, changes to Peel Street have resulted in the loss of the historic arrangement and understanding of the setting from the mid-19th century and before.

New Mills

6.9 The HER search shows the following information regarding New Mills:

The oldest surviving building of the complex is a 4-storey mill (building A) built of stone with cast-iron columns and timber floor beams, with partial basement at the north end and later stair tower on the west side. There is also a probable former engine house at the north-east corner. Inside, the building appears to consist of a single large working space on each floor, probably used for spinning originally. The building appears relatively unaltered since construction and there is good evidence for its constructional detail and power transmission via the former line shafting. Extensive weaving shed stands to the east.

Another building (building B) appears to date from 1906 and is also of four storeys with basement. It has a horizontal engine house at its north-east corner with the aforementioned date inscribed on the gable. The mill building is stone built with cast-iron columns and steel floor beams, distinguishing it from the earlier Building A. The south end of the building contains original offices on the ground floor, built for Crowther Bruce & Co Ltd, while the remainder is mostly large open working spaces, probably for spinning, although the top floor has large roof lights which suggest other uses. The engine house survives essentially as a shell, its interior converted to a canteen area.

A large weaving shed (building C) of the late 19th century, but is unusual in that it has two storeys in places. It is attached on the west side of Building B (whose ground floor wall allows free access between the two buildings) and consists of a single space on the ground floor with the original arrangement of columns with bolting faces for line shafting. Three bays near the north end are of two storeys and may have been used for mending or other purposes.³¹

³¹ Stephen Haigh Building Archaeologist, 2007, New Mills, Brougham Road, Marsden: Background Information (Report) Ref. SWY4146. West Yorkshire Archaeology Advisory Service (WYAAS) Ref. MWY5243.



Figure 3 Looking down towards the low-level mill buildings and Derby Terrace.



Figure 4 Looking towards the junction of Derby Terrace and Peel Street.



Figure 5 Looking across the low-level development to the East.



Figure 6 The multi-storey buildings dominate the landscape.



Figure 7 The East tower on Building B.



Figure 8 The South section of Building B, facing Brougham Road, With the south elevation of building A visible in the background, which is probably one of the oldest on the site, although it has been modified.



Figure 9 The mill's relationship with the river is an integral part of its character.



Figure 10 Low-rise late-19th and early 20th-century buildings.



Figure 11 View towards Brougham Road



Figure 12 The space between the two multi-storey blocks, A and B, is narrow and its drama is enhanced by the high-level tunnel connections.



Figure 13 The towers are dominant in the space between the two multi-storey buildings.

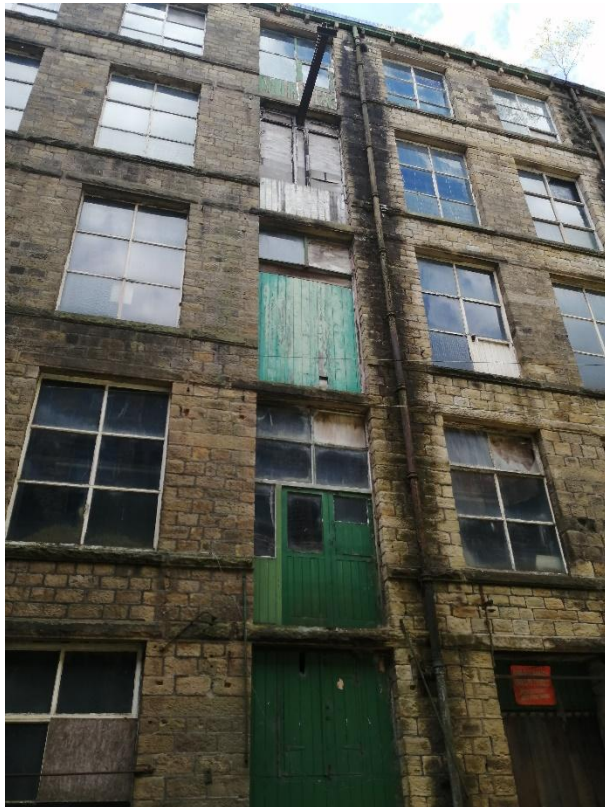


Figure 14 A series of doorways with lifting gear on Building A.



Figure 15 Victorian / Edwardian external doors.



Figure 16 Interior of the large single storey mills.



Figure 17 Some of the machinery is extant.



Figure 18 Top floor of Building A.

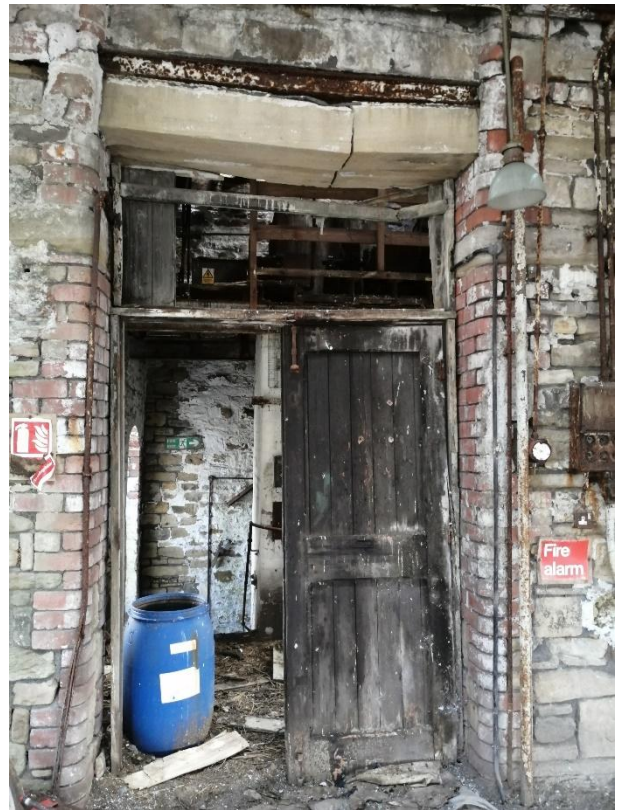


Figure 19 Typical doorways, stairs and lifts.



Figure 20 Iron columns support the timber floor and roof structures.



Figure 21 Interior of a high-level tunnel.



Figure 22 Pulleys and lifting gear.



Figure 23 Historic services remain in variable conditions.

Phasing

- 6.10 The site is a collage of buildings erected at different times to form what is understood as New Mills today. This consists mostly of development from the turn of the 19th century and early 20th century. The expansion of the mill up to the 1930s, over the river and waterfall, increased the footprint substantially.
- 6.11 The existing maps have been overlaid on the current floor plan to identify the development of the building over time.

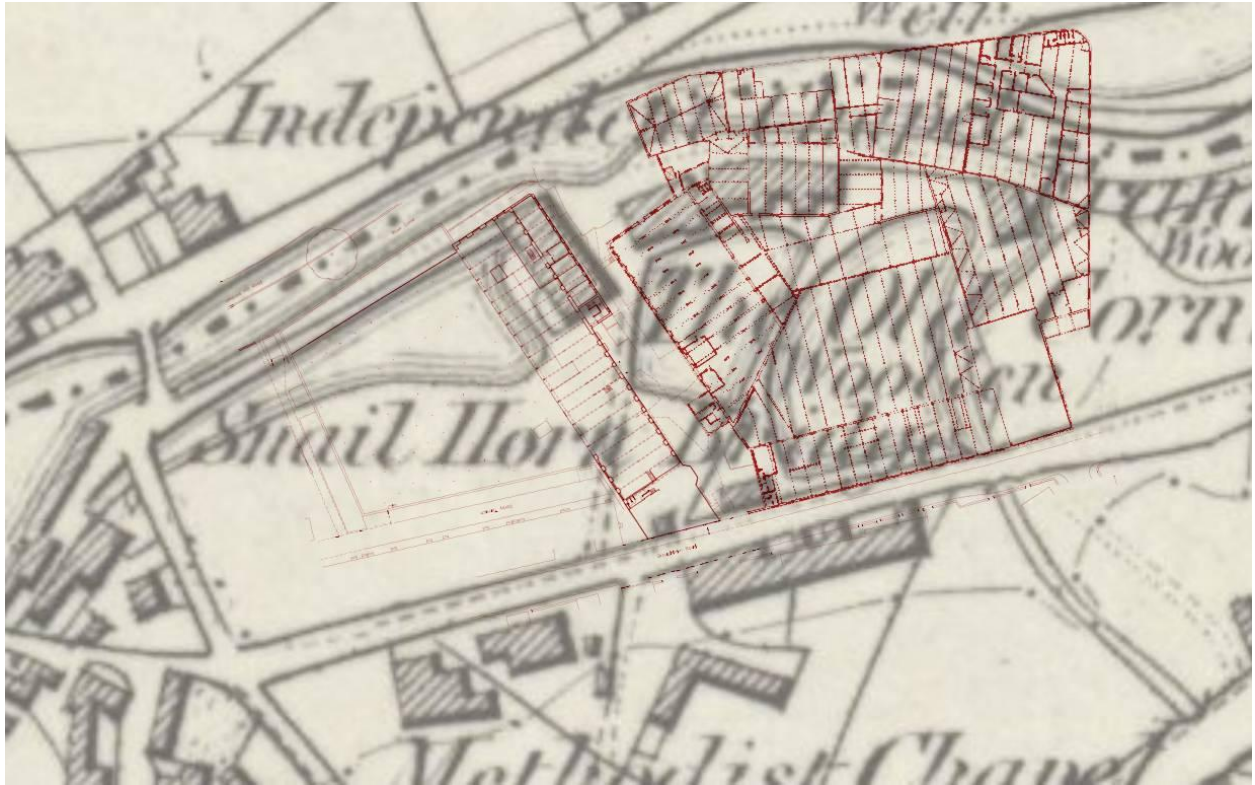


Figure 24 Overlay of existing building on the 1854 map

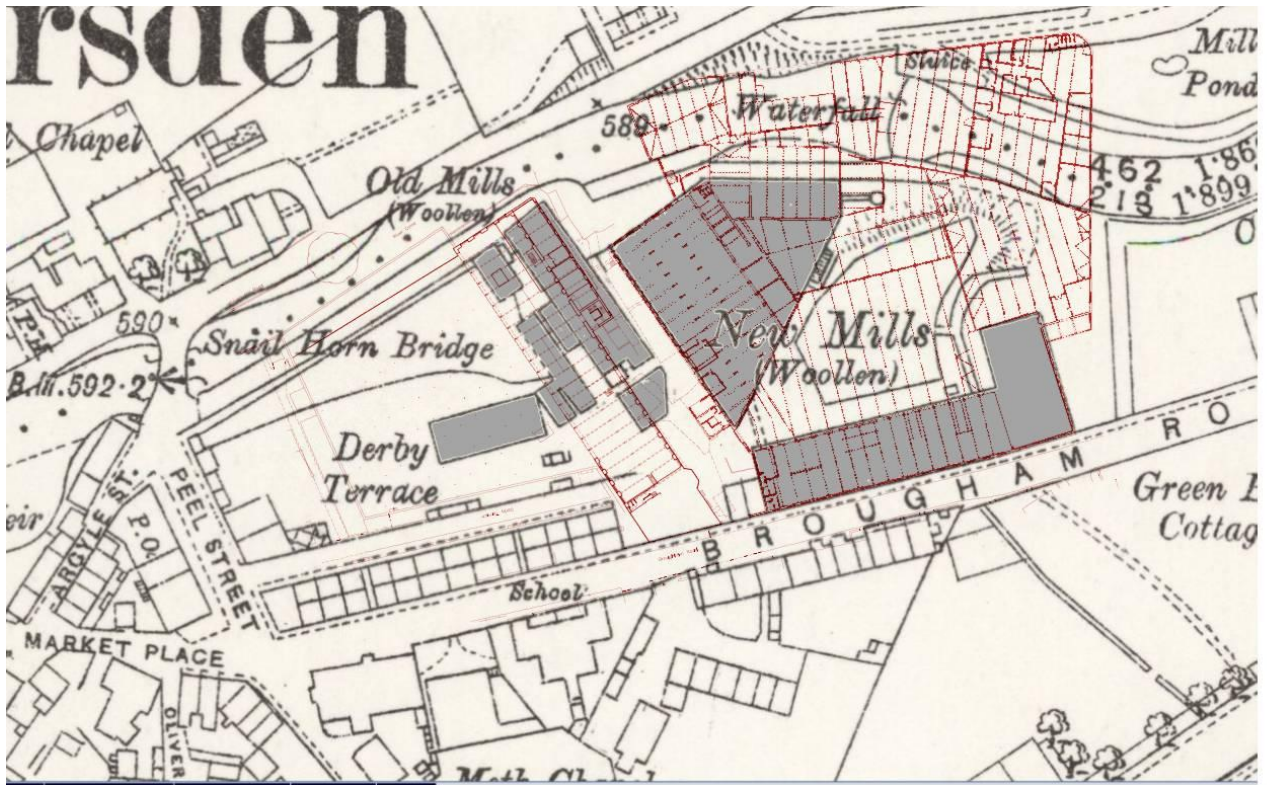


Figure 25 Overlay of existing building on the 1898 map



Figure 26 Overlay of existing building on the 1906 map

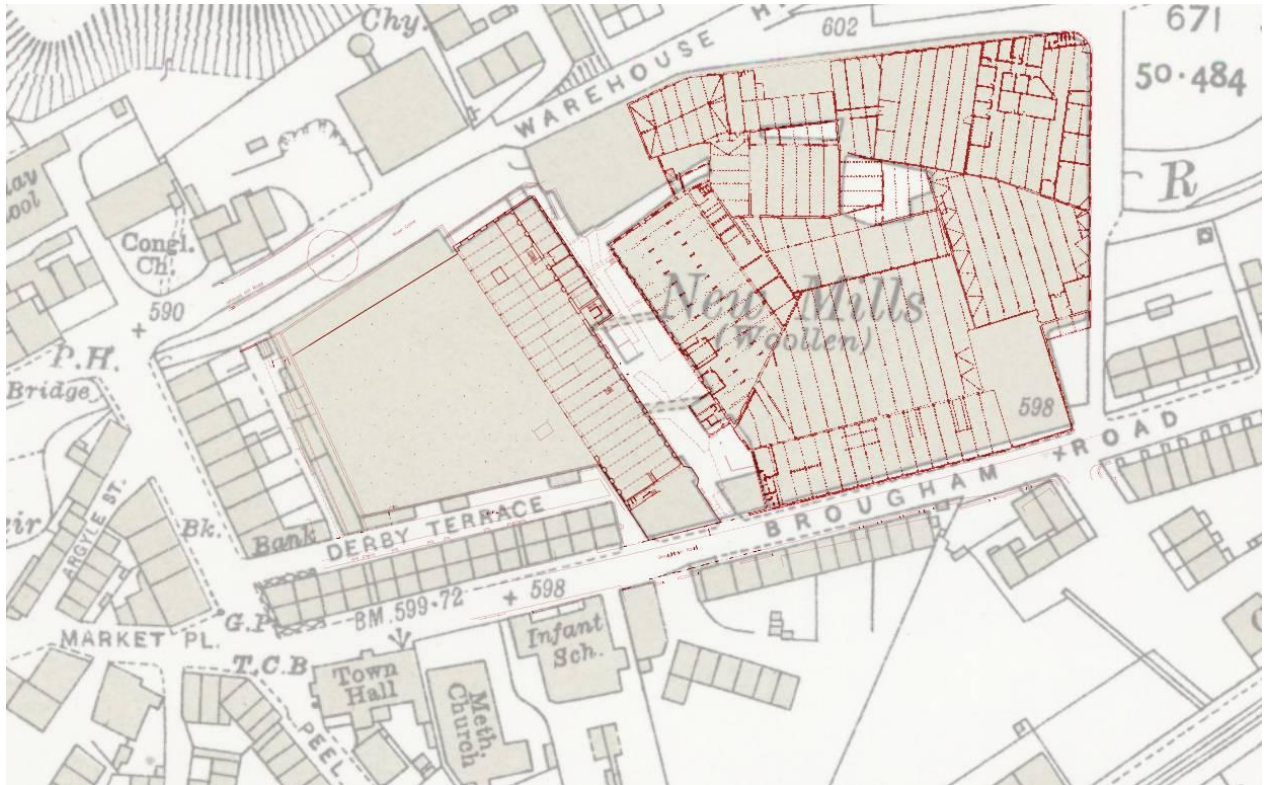


Figure 27 Overlay of existing building on the 1932 map

6.12 Figure 3 shows an outline assessment of the development of New Mills with the suggested historic phasing:

- Phase 1 (orange) 1854-94 | Areas 1 to 4 |
- Phase 2 (blue) 1894-1908 | Areas 5 to 12 | Area A
- Phase 3 (pink) 1908-1932 | Area 13 to 20 | Area B, C, D,
- Phase 4 (green) 1932 to 2000 | Area to 24 |



Figure 28 Initial Phasing diagram of New Mills.

6.13 Following further work undertaken to assess the building in order to develop a more detailed phasing plan, (particularly of the areas to the East of the site, where the phasing is not as clear), the following plan has been developed. This plan gives a better understanding of the phasing for the individual walls which comprise this area.

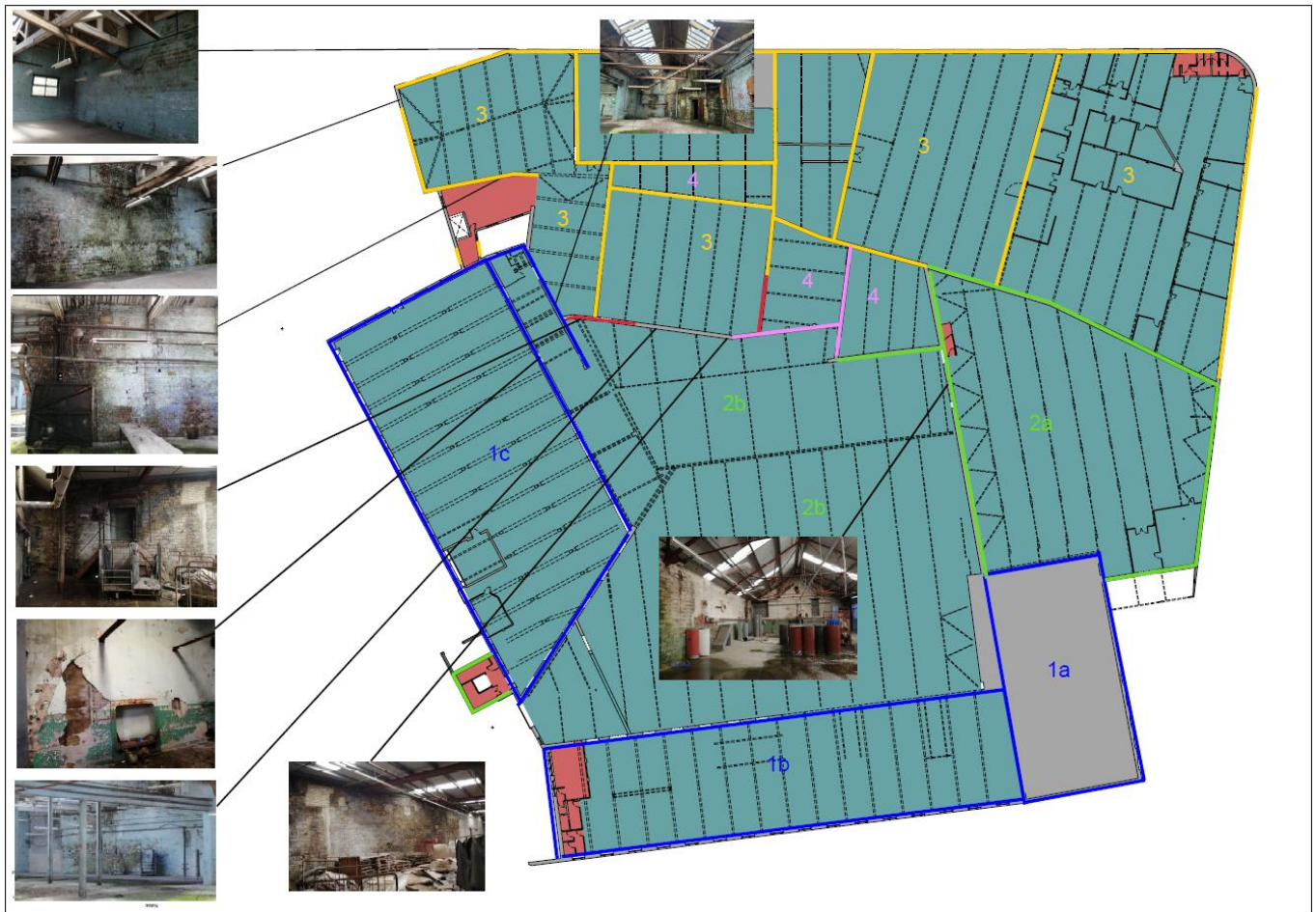


Figure 29 Red walls indicate the earliest building fabric with the subsequent phases identified in Blue, Green, Orange and Pink respectively.

Summary

- 6.14 New Mills is dominant in Marsden due to its scale and its location at the foot of the valley. The taller blocks, the imposing storeys, distinguished architectural features on some of the building facades and the expressed stair tower, are noteworthy. This level of detail provides a positive contribution to the conservation area and its character is typical of 19th century mill architecture.
- 6.15 The expansion of New Mills over the river however, resulted in a loss of the Colne Valley setting through the village and the relationship of the building massing is disproportionate to the overall scale of Marsden. East of New Mills along the River Colne, the former setting of the lakeside view has been infilled and the relationship with the river and bank topography is not evident. Other mills in Marsden, such as Clough Lea Mills, have been demolished.
- 6.16 As can be seen from the phasing plan, there have been buildings on the site from the mid-19th century. We have also been able to find a newspaper article which identifies the buildings for sale in 1808. One of which is listed as “ the lately erected Cotton Mill, commonly called the New Mill” and reservoir, identified below as no1. and described as 3 storey.



- 1 New Mill & reservoir
- 2d Franks Mill
- 3d Cottage Houses and Paddocks
- 4 Upper End Mill
- 5 The Factory
- 6 Winding Shop
- 7 Engine House

Figure 30 Historic map with site identification

MARSDEN COTTON MILLS.
SALE BY AUCTION.
 At the New Inn, in Marsden, on an early day in the month of April next, of which timely notice will be given, subject to such conditions as shall be produced at the time of sale,
 ALL those valuable Copyhold & Leasehold Estates, consisting of very powerful Water Mills, Messuage Cottages, Lands, &c. late in the possession of Mr J. Haigh, elegantly situate at Marsden, upon the Banks of the Huddersfield Canal, and near the Turnpike Road from Huddersfield to Manchester, in the following Lots:—
 Lot 1. All that substantial lately-erected Cotton Mill, commonly called the New Mill, 63 feet by 34 within, or thereabouts, 3 stories high, besides the garrets, with a powerful water wheel, 16 feet diameter by 11 feet 7 inches broad, tumbling shafts, and all the mill-work; together with the reservoir originally belonging the same when occupied as a corn mill.
 Lot 2d. All that Water Mill, commonly called Franks Mill, 35 feet by 23 feet 6 inches within, or thereabouts, 3 stories high, with a powerful water wheel, 30 feet diameter & 2 feet 3 inches broad, with all the tumbling shafts and mill-work belonging thereto; and the reservoir belonging the same. The premises, comprised in the above Lots, are copyhold, of the Manor of Marsden, the fines whereof are small and certain.
 Lot 3d. All those three Cottage Houses, Paddock or Garden, situate in Marsden, late in the occupation of Joseph Cash, Hannah Wood, and John Newton; and also all that Meadow Field, called the Hoim Ing, laying contiguous to Lot No 1, containing about 1½ acres, or thereabouts, be the same more or less. The premises, comprised in this Lot, are held under a lease for 999 years (of which only about 20 years are expired) at the annual rent of fifteen guineas.

Lot 4th. All that valuable Water Mill commonly called Upper End Mill, 127 feet and a half by 30 within, or thereabouts, 4 stories high, besides the garrets, with a water wheel, 16 feet diameter by 12 broad, and all the tumbling shafts and mill-wright work thereto belonging.
 Lot 5th. All that substantial Building, called the Factory, 90 feet by 30 within, or thereabouts, 4 stories high, besides garrets, including counting-house, weaving shop, &c. &c.
 Lot 6th. All that Building adjoining the last Lot, and used as a winding shop, 22 feet and a half by 7 feet and a half within.
 Lot 7th. All that Patent Steam Engine, considered equal to 24 horse power, with the engine house, 27 feet by 10 feet, or thereabouts within. The above Steam Engine is situate in the angle of the Upper End Mill, and the Factory so constructed as to turn the whole machinery of both Mills in the driest seasons, and thus furnish a constant power.
 Lot 8th. All that well-finished Messuage or Dwelling-house, consisting, on the ground floor, of parlour, dining room, 21 feet by 18, kitchen & pantry, 3 stories high, besides garrets, with an extensive garden-ground adjoining the same.

Lot 9th. A newly-erected four-stall Stable, with hay-loft over the same & the yard belonging thereto.
 Lot 10th. Two small Buildings, lately used as drying and drying houses, situate near to Lot 4.
 The Lots from 4 to 10, both inclusive, are leasehold for a term of 999 years, (of which about 20 only are expired) at the annual rent of 16l. 16s. which will be apportioned upon the different Lots.
 The above Premises are well worth the attention of any House extensively engaged in the manufacturing of woollens or cottons, as there is every convenience for carrying on a concern of that kind to any extent.
 On the following day, will be sold, all the Cotton Machinery, belonging to the same Mills, consisting of breaking, carding & finishing engines, mules, roving, drawing & twisting frames, throstles, jennies, looms, reels, batting and stretching frames, &c. &c. too numerous to mention; but Catalogues of them will be ready to be delivered a week before the day of sale; and the premises may be viewed by applying to Mr J. Haigh, on the premises, at any time previous to the sale; or to his Assignees; or at the Office of Mr Batty, Attorney at Law, in Huddersfield.
 N. B. Marsden is six miles from Huddersfield, and seventeen from Manchester.
 Huddersfield, 1st March, 1808.

Figure 30 Historic newspaper clippings

6.17 This building is also apparent on a number of historic photographs seen within the context of the later adjacent mill. These photographs are in keeping with the layout shown in the 1906 map.

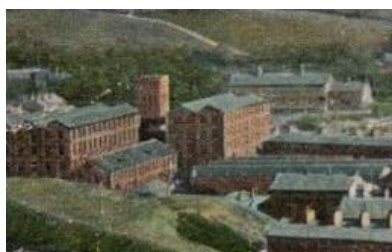


Figure 31 Coloured photograph c.1900



Figure 32 Photograph c.1890

6.18 It is likely that the smaller “Engine House” building (no. 11 on the phasing plan) is a partial remnant of the New Mill identified in the article above. It is unlikely that this building has survived unchanged, with references found to the mill in a newspaper article dated 1808 which refers to the mill as having been recently constructed. As stated previously, the current building on the site was constructed prior to the multistorey.

6.19 What we can be certain of is that this building predates the mill adjacent and was partially demolished in order to construct the mill. This is apparent from the staggered joint between the two buildings, and the fact that design elements in the multistorey mill have been amended (such as string courses shortened) in order to accommodate the building fabric from the earlier structure.



Figure 33 Photograph showing the joint in the built fabric

6.20 In general, the site has grown and adapted over the last 170 years to meet the ever-changing needs of the mill industry. Existing buildings have been lost and others adapted with new structures added as required. The presence of a mill in this location does provide a positive contribution to the conservation area and give an indication of the historic use of the site and the industrial heritage of Marsden.

7.0 Assessment of Significance

- 7.1 This assessment identifies the assessment of the site at New Mills Marsden, to both the undesignated heritage asset and the Marsden Conservation Area.

Archaeological

- 7.2 The site has the potential to reveal evidence of past human activity both from the early days of the original mill site but also from the use of the site prior to the construction of the Mill. Although due to the extensive development of the site the likelihood of finding any elements of historic significance as low.

Architectural and Artistic

- 7.3 The mill itself has a strong visual presence within the centre of Marsden. The multi-story Mills and Towers provide a Moderate contribution to the significance of the conservation area. The architectural style of the buildings on the site are typical of Mills from the 19th and 20th centuries. In general, the multi-story Mills have large rectangular window openings set at regular intervals along the majority of the elevations. The majority of these buildings contribute a moderate level of significance to the Architectural and Artistic significance of the Marsden Conservation Area.
- 7.4 In addition to the towers, there are two buildings on the site which are more decorative in terms of their architectural and artistic detailing. The small Engine House located to the north of the site running adjacent to the north south multistorey block, and the southern elevation of the afore mentioned multistorey mill. Both these buildings have an unusual amount of decorative detailing including arched windows with stone voussoirs and projecting key stones in addition to a large arched opening in the north elevation, and decorative carved cornice details. In general, these contribute a high level of significance to the non-designated heritage asset and a moderate to high level of significance to the Marsden Conservation Area.

Historic Significance

- 7.5 There have been industrial buildings on the site for over 200 years and this industrial heritage provides a strong contribution to the historic development of Marsden as a Mill Town. Any remnants of original built fabric, in addition to Phase 1 structures are of considerable significance to the non-designated heritage asset, Phase 2 are High, Phase 3 are moderate, and Phase 4 are low.
- 7.6 With regards to the significance of the conservation area, the industrial nature of the site is of considerable significance to the historic development of Marsden. The larger multi storey buildings contribute to this significance in addition to the towers and the 2-storey mill building which fronts Brougham Road.

Significance overview

- 7.7 The multi-storey East and West Mills, the towers and the Brougham Road buildings provide a high contribution to the significance of the conservation area and the non-designated heritage asset as a whole. The low-level Mills and the 20th century additions provide a Low to Moderate contribution to the significance of both the conservation area and the non-designated heritage asset

8.0 Pre Application Advice

8.1 The written advice received from the LPA (with regards to heritage considerations) was as follows:

- In accordance with local policy documents, the site requires retention and reuse of the original mill buildings unless adequate justification for loss is provided. In addition NPPF and Local Plan policies LP7, LP24, LP35 require harm to Conservation Area to be weighed against public benefits.
- The council requested that buildings 1 (East Mill), 20 (West Mill north), towers A & B, bridges C & D, and Brougham Road buildings 3 & 4 should be retained as starting point.
- Robust justification was required for any demolition, including heritage significance, structural condition, and viability evidence. If demolition was to be proposed (e.g., Wages Office), the scheme should deliver high-quality replacement architecture or public realm. In addition it was requested that the application should demonstrate how public benefits outweigh heritage harm.
- Comprehensive access strategy is required

8.2 The LPA also requested that the following evidence is provided, and as a result has been submitted, as part of this application:

- Full Heritage Impact Assessment detailing significance and harm.
- Structural Condition Reports confirming repair impracticality for demolished elements.
- Financial Viability Assessment demonstrating retention of all buildings is unfeasible.
- Public Benefits Statement quantifying jobs, housing, regeneration, and environmental gains.

8.3 A summary of the findings of the submitted documents has been included below, paying particular regard to the heritage aspects of the site and the demolition strategy, not only of the wages office, but also the additional buildings on the site.

Options appraisal

8.4 As with any site involving a heritage asset or its setting, the design process began by exploring full retention of the existing buildings. Over the course of development, 33 formal options were assessed in detail. Additional informal variations were considered but not progressed to drawings, as they offered no material improvement and shared the same fundamental constraints.

8.5 The following section summarises the principal design options considered. Each option includes an excerpt outlining its assessment in terms of heritage impact and overall viability.

Retention Option:

- Heritage assessment – **No harm**
- Viability assessment – **Unviable**



Figure 34 Option Masterplan

Element	Level of significance	Alteration	What is the potential impact	What is the need for change	Final Impact	Viability appraisal
Conservation Area	High	Loss of the majority of the low significance 20 th century elements,	Less than substantial harm	The buildings need to be brought back into use to save the site and secure the future of the remaining buildings	No harm	Unviable
Non-designated heritage asset	Moderate	including partial loss of the Brougham Road Building	Less than substantial harm		No harm	

Demolition of the East Mill with retention of the Wages Office

- Heritage assessment – **Substantial Harm**
- Viability assessment – **Unviable**

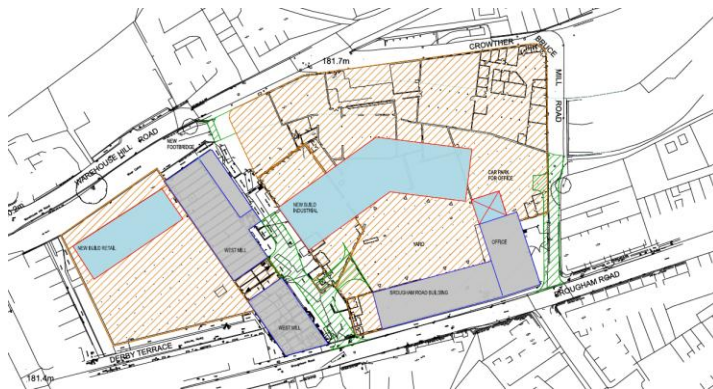


Figure 35 Option Masterplan

Element	Level of significance	Alteration	What is the potential impact	What is the need for change	Final Impact	Viability appraisal
Conservation Area	High	Loss of the majority of the low significance 20 th century elements,	Substantial harm	The buildings need to be brought back into use to save the site and secure the future of the remaining buildings	Less than substantial Harm	Unviable
Non-designated heritage asset	Moderate	partial loss of the Brougham Road	Substantial harm		Substantial harm	

Element	Level of significance	Alteration	What is the potential impact	What is the need for change	Final Impact	Viability appraisal
		Building, loss of the multi storey East Mill				

Loss of both East Mill and Wages Office

- Heritage assessment – **Substantial harm**
- Viability assessment – **viable (with levelling up funding)**

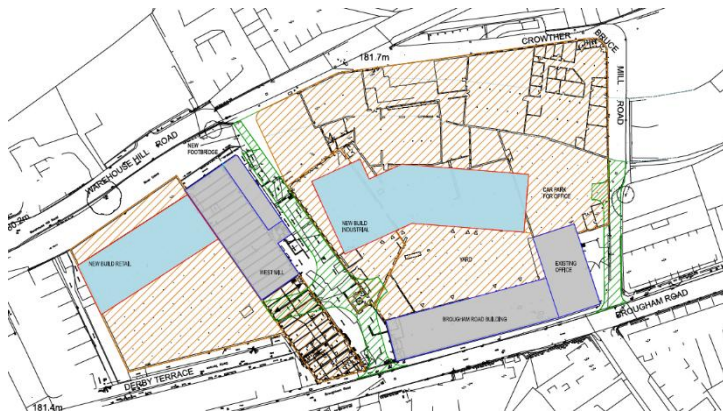


Figure 36 Option Masterplan

Element	Level of significance	Alteration	What is the potential impact	What is the need for change	Final Impact	Viability appraisal
Conservation Area	High	Loss of the majority of the low significance 20 th century elements, loss of the multi storey East Mill Loss of the southern section of the West Mill	Substantial harm	The buildings need to be brought back into use to save the site and secure the future of the remaining buildings	Substantial harm	Viable (with levelling up funding)
Non-designated heritage asset	Moderate		Substantial harm		Substantial harm	

Access Strategy

- 8.6 Demolition opens space for realignment of internal roads and service yards, making it possible to integrate:
- One-way system on Brougham Road (as suggested by the council).
 - Visibility improvements at junctions.
 - Safer turning radii for larger vehicles.
Without demolition, these improvements would be physically impossible.
- 8.7 Removing low-level infill buildings creates corridors for pedestrian and cycle routes through the site, aligning with council requests for permeability and active travel.
- 8.8 The layout after demolition does not preclude a future pedestrian/cycle bridge over the River Colne, as recommended by the council.
- 8.9 Demolition frees up space for western car park and service yard, reducing pressure on Brougham Road and Crowther Bruce Mill Road. This in turn supports the council's aim to manage traffic and parking in Marsden without creating large, visually intrusive surface parking areas.
- 8.10 By creating space for proper site layout, demolition enables:
- EV charging points.
 - Car Club spaces.
 - Cycle storage and safe movement routes.
These measures would be compromised if the site remained fully built-up.
- 8.11 Alternative site access options were considered but rejected for the following reasons:
- Derby Terrace access too narrow; would impact residential amenity.
 - River bridge option financially and practically unviable.
 - Mill Road access does not resolve congestion and western site access.

Public Benefits

- 8.12 As part of the design process the following public benefits have been identified (for further details please see Planning Statement)

Jobs & Economic Impact

- Direct operational jobs: 314 (light industrial, retail, office, maker spaces).
- Indirect/regional jobs: 453.
- Operational GVA: approx. £23.9m per year.
- Construction phase: ~277 jobs over 5 years (~55/year) plus 80 indirect jobs.
- Construction GVA: approx. £4.2m per year.

Housing Delivery

- Around 61 homes proposed (Local Plan allocation suggested ~29).

- Doubles expected housing output, supporting Kirklees Housing Delivery Test response.
- Contributes to addressing housing shortage and affordability issues.

Regeneration & Social Value

- Revitalises a derelict, unsafe site into a vibrant mixed-use hub.
- Enhances the village centre with new retail, leisure, and workspace opportunities.
- Supports local employment diversity and skills development.
- Removes health and safety risks from deteriorating structures.

Environmental & Connectivity Gains

- De-culverting and opening up River Colne for ecological and flood resilience benefits.
- Creation of riverside walkway and landscaped public realm.
- Improved permeability and active travel routes for pedestrians and cyclists.
- Supports car-free living through proximity to rail and sustainable transport measures

9.0 Impact Assessment

- 9.1 KPP have undertaken an extensive options appraisal to identify potential design solutions which balance the requirements of the brief, the need for the project to be viable and the need to protect the special character of the conservation area. They have produced a number of options to show varying levels of alteration to the existing buildings, taking into account the restrictions placed on the site by access and highways. These options have been assessed in order to understand the level of harm and have also undergone a viability test to understand the financial implications.
- 9.2 As a result of this appraisal, and feedback from a subsequent pre-app submission, a final proposal has been identified which retains all of the surviving Phase 1 fabric, retains both of the towers on the site, in addition to the East Mill, Brougham Road Mills and the northern section of the West Mill. The viability appraisal for this option has determined that the scheme does still result in a negative land value, as such it is proposed to phase the development.

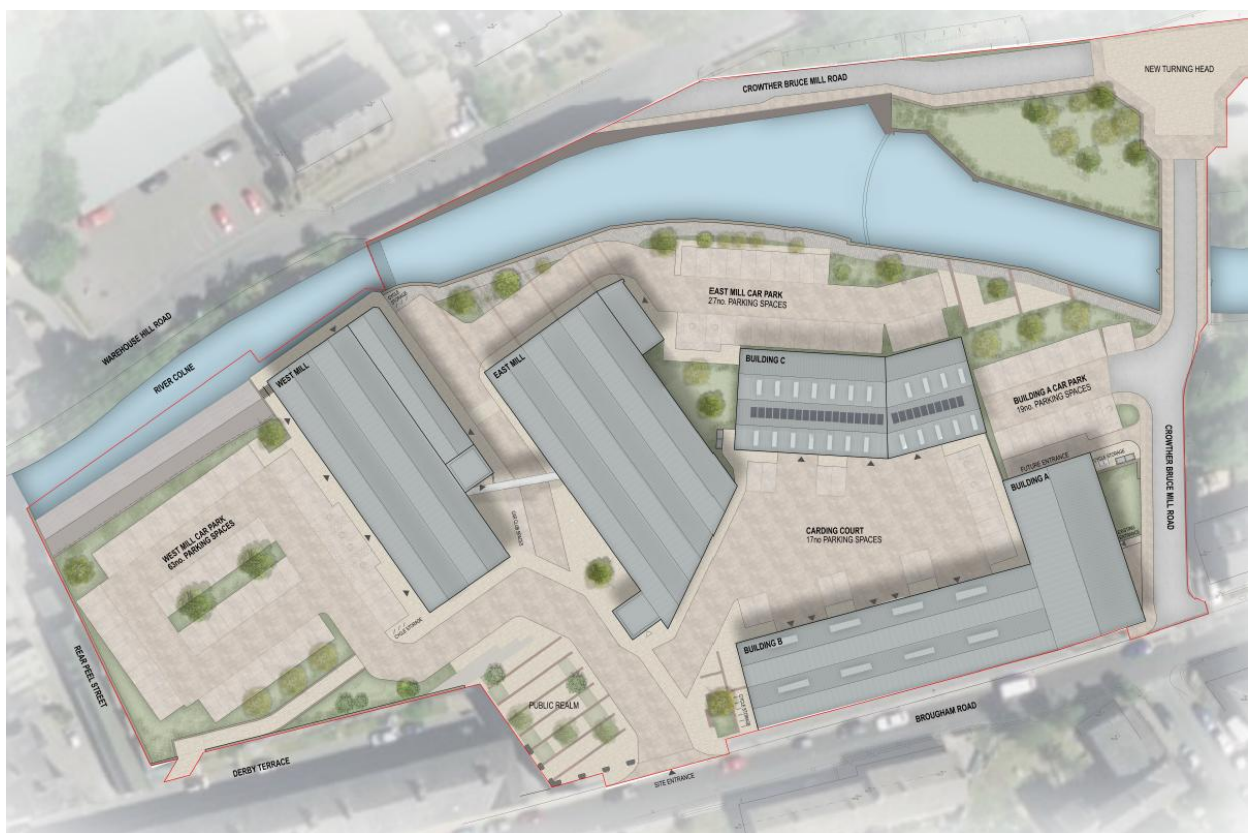


Figure 37 Proposed masterplan



Figure 38 Proposed view from the north east



Figure 39 Proposed view from the north west



Figure 40 Proposed view from the South-west

9.3 The subsequent impact of the proposal has been assessed below:

Element	Level of significance	Alteration	What is the need for change	What is the potential impact	Mitigation Strategy	Final Impact considering public benefit and mitigation
Conservation Area	High	Loss of the majority of the low significance 20 th century elements	The buildings need to be brought back into use to save the site and buildings. This will allow the site to be used by the public and will provide sufficient return to enable the client to save these undesignated heritage assets.	Less than substantial harm	Provision of a thoughtfully designed public realm space which references the Wages Office and retained an element of the façade as a feature within the landscape. Public benefits include: Employment and economic benefits Housing Delivery Regeneration & Social Value Environmental & Connectivity Gains	Beneficial
Non-designated heritage asset	Moderate	Retention of the East and Northern section of the West Mill and the Brougham Road Buildings		Less than substantial harm		Beneficial

10.0 Conclusion

- 10.1 The proposed development will result in moderate less than substantial harm to the significance of the Marsden Conservation Area and associated non-designated heritage assets. This harm arises primarily from the loss of the Wages Office frontage but is mitigated by the retention of the East Mill, West Mill, and their towers, which preserve the site's defining character and its contribution to the Conservation Area.
- 10.2 In accordance with NPPF Paragraph 208, this harm is outweighed by substantial public benefits, including the creation of 314 jobs, £23.9m annual GVA, delivery of 61 homes, and major regeneration and environmental improvements. The scheme secures the optimum viable use of the site, addressing long-standing vacancy since 2002 and overcoming viability constraints despite grant funding.
- 10.3 It is also the finding of this assessment that the test for approval of the scheme under the NPPF have been met:
- The site has been vacant since 2002
 - It has not been possible to find a viable use for the site due to the size and scale of the buildings on the site and the limited income stream these will generate.
 - Grant funding has been sourced, but this is not sufficient to enable the repair and redevelopment of all the buildings
- 10.4 With regards to the test for less than substantial harm, Paragraph 208 of the NPPF states:
- Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*
- 10.5 The proposed strategy prioritises retention of key mills, robust justification for selective demolition, and delivery of public benefits to outweigh heritage harm under NPPF tests. The demolition strategy is not just about heritage and viability—it is **fundamental to delivering a safe, policy-compliant access solution**, unlocking space for highways improvements, sustainable transport, and future connectivity options.
- 10.6 As a result, it is the finding of this report that the development of the site as per the proposed scheme, will result in less than substantial harm to both the Conservation Area and the undesignated heritage asset, whilst also providing substantial public benefits and securing the optimum viable use.

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