



Heritage Impact Assessment

Junction Mills, 129-133 Thornton Road, Bradford

Bradford College

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Basis of Report

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Executive Summary

SLR Consulting Ltd was commissioned by Bradford College to produce a Heritage Impact Assessment to inform a proposed new development upon the Site currently occupied by Junction Mills, 129-133 Thornton Road, Bradford, centred at NGR SE 15853 33024. Demolition of the current property is being sought separately under permitted development rights though the impact of this demolition is considered throughout this report. The current property comprises a much-altered former cotton spinning mill, dating to the mid- to late 19th and early 20th centuries, which is recorded in the West Yorkshire Historic Environment Record (WYHER ref. MWY12020).

This report considers the historic development and significance of Junction Mills, 129-133 Thornton Road, Bradford, its contributions, if any, to the significance of any nearby heritage assets, and explores the possible impacts of the proposed development of the Site upon that significance.

This report concludes that Junction Mills comprises a non-designated heritage asset of low significance only. The building's residual significance derives from its few surviving architectural features, primarily the evidence of construction phasing and the cast-iron columns which illustrate its former industrial function. Overall, however, the building is architecturally unremarkable, and its north range is of no heritage significance. Though the building retains some historic fabric relating to the original mid- to late 19th-century mill, the greater part - more than 50% by area - of the original mill has been demolished to accommodate the widening of Thornton Road and the creation of the existing north range between 1921 and 1934. In addition, the upper floor and roof of its south range was demolished between 1938 and 2002. Subsequent alterations to planform and function, including the replacement of the building's windows with modern uPVC units and the installation of plastic rainwater goods, have further eroded the building's authenticity and architectural significance. Further loss of significance has occurred as a result of extensive water ingress and resultant well-progressed dry rot, particularly at the eastern end of the building. The building retains no extant machinery relating to its original function, and nearly all evidence for power transmission has been lost, save for the cast iron columns.

Junction Mills makes a minor contribution to the significance of the Goitside Conservation Area and the nearby Garden Mill, a non-designated heritage asset, as part of their setting. Nevertheless, the significant alterations to the building, its diminished architectural interest, and unsympathetic alterations to the south side of Thornton Road, limit those contributions.

The demolition of the existing mill would result in the total loss of a non-designated heritage asset of low significance. However, the greater architectural interest of the proposed development, the public benefits inherent in enhancing Bradford College's educational offering and meeting the objectives of the Bradford City Centre Area Action Plan 2017, and the aesthetic enhancements to the setting of the Goitside Conservation Area is such that any harm should be outweighed. It is considered that the proposed development upon the Site would preserve the setting of the Goitside Conservation Area and any heritage assets within its boundary. The loss of group value with Garden Mills would result in very low-level harm to Garden Mills' significance as a non-designated heritage asset, though the greater part of its significance, as embodied in its built form, would be conserved.

As it stands, the scheme is compliant with the relevant heritage considerations as set out under Policy EN3 of the Bradford District Core Strategy DPD 2017, the NPPF 2023, and those set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990* (hereafter the 'Planning Act'). The council should be minded that, where proposals will preserve or enhance the character and appearance of a conservation area or listed building, the proposed development should be treated favourably.

The Site may be underlain by archaeological remains relating to Junction Mills, such as drainage features, and possible machine base and associated features and paraphernalia at the western end of the building. Should any such features survive, their significance would likely be low, being contingent upon their ability to contribute to our understanding of the function of the mill. It is likely that any archaeological remains relating to Junction Mills will be removed as part of the proposed development, resulting in a complete loss of significance. The probability of encountering significant remains predating the mill is negligible; it is unlikely such remains would be impacted. The probability for encountering any archaeological remains of national importance, such as would preclude development, within the Site area is nil.



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Appendices

Appendix A **Relevant local planning policy**

Appendix B **Methodology and Glossary of Key Terms**



1.0 Introduction

1.1 Project Background

SLR Consulting Ltd was commissioned by Bradford College to produce a Heritage Impact Assessment to inform proposed development upon the Site currently occupied by the property known as Junction Mills, 129-133 Thornton Road, Bradford, centred at NGR SE 15853 33024, and the construction of a new Future Technologies Centre (**Drawing 1**). Demolition of the current property is being sought separately under permitted development rights though the impact of this demolition is considered throughout this report. The property comprises a much-altered former cotton spinning mill, dating to the mid- to late 19th and early 20th centuries, which is recorded in the West Yorkshire Historic Environment Record as a non-designated heritage asset (WYHER ref. MWY12020). The mill is situated to the south of (external to) the Goitside Conservation Area.

This report presents a proportionate assessment which considers the historic development and significance¹ of Junction Mills, 129-133 Thornton Road, Bradford, its contributions, if any, to the significance of any nearby heritage assets, including the Goitside Conservation Area, and explores the possible impacts of the proposed development upon that significance. Comprehensive photograph coverage of the building is available [here](#), alongside photographs reproduced within this report, which should be referred to alongside this assessment.

This assessment has been prepared in compliance with the National Planning Policy Framework (NPPF) (2023), Bradford District Core Strategy (DPD 2017), and Historic England guidance, and with full regard to the ethical standards of the IHBC and ClfA. Relevant local plan policies are included at the back of this report (**Appendix A**).

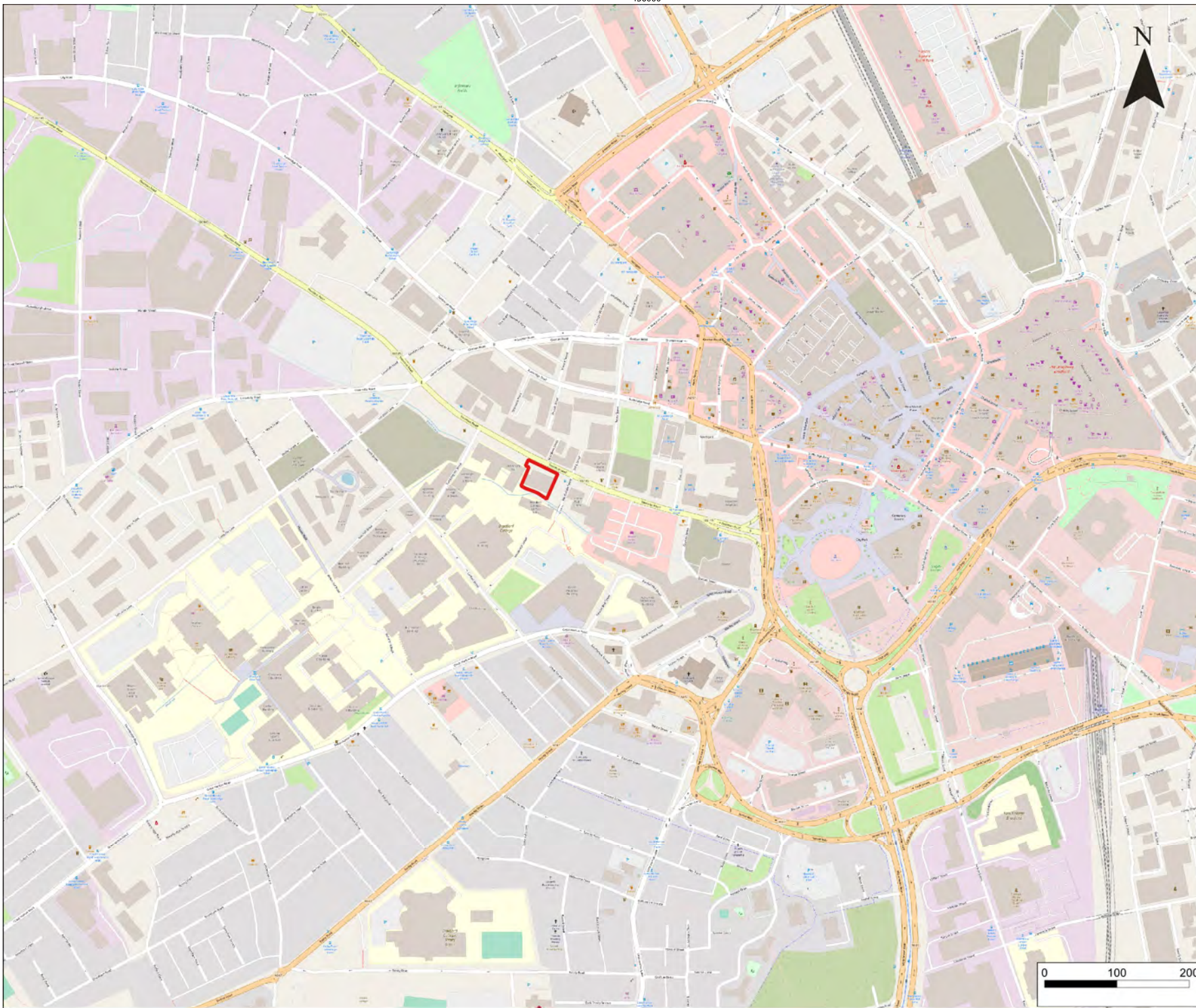
The methodology employed during this assessment was based upon relevant professional guidance, including the Chartered Institute for Archaeologists' *Standard and guidance for Historic Environment Desk-based Assessment* (ClfA 2020), and relevant technical guidance issued by Historic England, including *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (2019). A methodology and glossary of key terms is included at the back of this report (**Appendix B**).

¹ 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. For World Heritage sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.



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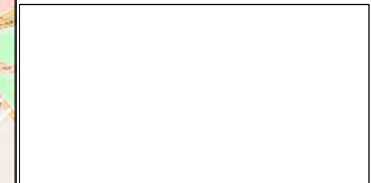
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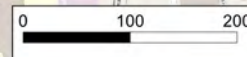
Application Boundary

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Bradford College Future Technology Centre
 Heritage Impact Assessment
 Site Location Plan
DRAWING 1



Scale 1:5,000@A3 Date September 2023

2.0 Historic background

2.1 Introduction

The following section provides an overview of the historic development of Junction Mills, 129-133 Thornton Road, Bradford, based on an assessment of the building, the West Yorkshire Historic Environment Record (HER), relevant historic mapping and documents, and online data sources. Designated heritage assets are presented in relation to the Site on **Drawing 2**.

2.2 The development of the Goitside Industrial Quarter

The Goitside area forms the locus of Bradford's early industrialisation. The goit itself formed an artificial channel, likely originating in the medieval period, and constructed to redirect water from the Bradford Beck to power private manorial cornmills, which may have been sited between what are now Aldermanbury Street and Godwin Street, approximately 350 metres east of the Site (Bradford District Council 2005: 6). The goit ran to the north of Thornton Road, running northwest to southeast to rejoin the Bradford Beck (Ibid.).

The earliest industrial development within Bradford began near to the goit and beck around the beginning of the 19th century, with the development of The Holme factory in 1800 immediately north of the Site off Holmfield Street (Ibid.: 8). Following this, development proliferated along the flat valley bottom between the goit and beck (Ibid.). By 1803, Thompson's Mill had been constructed further to the west, on an area of land between Silsbridge Lane and the goit, which was latterly associated with the eminent industrialist Titus Salt, to whom the mill's weaving shed was leased (Ibid.). Salt went on to establish the model factory village at Saltaire as well as latterly being elected mayor of Bradford. As mills and industry burgeoned, new housing for workers was to follow, constructed within the north of the area, reserving the prime ground alongside the goit and beck for industry.

In the mid-1820s an Act of Parliament was approved for the construction of the Bradford and Thornton Turnpike Road (Thornton Road), running parallel with, and between, the goit and beck, improving access to the area and accelerating development (Ibid.: 9). Godfrey Wright, the largest inner-city landowner at the beginning of the 19th century, sold off much of his landholdings between the goit and Thornton Road to a number of industrialists in 1836 (Ibid.: 10). By the mid-19th century much of the area alongside the new road had been developed.

The Goitside area underwent a major redevelopment at the end of the 19th century, with the majority of surviving buildings dating to this period. In 1873, the construction of the Sunbridge Road brought further development to the area, forming a locus for further mills (Ibid.). Many of the older, smaller, mills were replaced at this time, being superseded by modern large mills.

The development of Bradford during the first half of the 19th century was so rapid that living conditions failed to keep pace with the changes. In this period, the area of the goitside became a notorious slum (Ibid.). The growing population and booming industry of Bradford led to a marked increase in industrial waste, in particular lanolin, and sewage being released into the Bradford Beck, and onwards to the River Aire (Bradford Corporation 1923). By 1868, the state of the pollution was such that William Stansfield of Esholt Hall, situated some 7 kilometres north of Bradford, obtained an injunction requiring the Corporation of Bradford to improve its sewerage system so as to not pollute the beck. The court, unable to see a solution, attempted to forbid any intensification of the nuisance, prohibiting under penalty of £10,000, '*the opening or permitting to be opened any additional main or branch sewer of any house drain or sewer into the outfall sewer...*' (Ibid.). The impracticality of the injunction was such that it was dissolved the following year, though with the Corporation being ordered to '*take practical measures for defecating the sewage before passing it into the River*' (Ibid.: 20). As a result, the Corporation constructed a new works at Craighall in partnership with a private enterprise to treat sewage waste before it was released into the river. By 1874, however, the firm had gone bankrupt, owing to the high levels of industrial waste which prevented the resale of treated sewage as fertiliser. With a new injunction issued, the Corporation took over the operation of the works in 1875. With the increase in the population and industry of Bradford, the works were soon rendered inadequate; by 1889 it was estimated that up to fifty tons of lanolin was poured into the river per day, in addition to the soaps and acids used to treat the wool (Ibid.). In 1899, the City's boundaries were extended. Within the extended area it was determined that the most appropriate site for a new extended works was the site of the Esholt estate alongside the River Aire. A protracted legal battle followed, with the City



attempting to purchase the estate through a compulsory purchase order, which was subsequently blocked by the House of Lords. By 1904, however, the family gave in, selling the property for £239,742.00 (BBC 2014; Bradford Corporation 1923).

By the 1920s, development within the Goitside area had reached its peak, and the area had taken the form it largely retains today (Bradford District Council 2005: 11).

2.3 Junction Mills, 129-133 Thornton Road, Bradford

The area of the Site had been developed as part of a tannery by the mid-19th-century, mapped on the 1852 Ordnance Survey Town Plan as comprising a series building surrounding a large yard with rows of vats (**Plate 1**). The tannery was sandwiched between Thornton Road, to the north, Bradford Beck to the south, a worsted spinning and weaving mill to the west, and a further worsted mill, labelled as Perseverance Mill, to the east.

By 1861, it would appear the tannery had been removed and replaced with a new cotton mill, with the Site being recorded in White's Bradford Directory of 1861 as '*Firth James & Thomas, cotton warp. manfrs. Junction Mill, Thornton Road*' (op cit.: 499). James and Thomas Firth are confirmed at the Site in the Jones' Mercantile Bradford Directory of 1863, Kelly's Bradford Directory of 1881 and 1901, and the Post Office Bradford Directories for 1888, 1891, and 1912 (all op cit.).

The 1891 Ordnance Survey mapping shows the tannery demolished, with a new spinning mill constructed in its stead (**Plate 2**). The mill is labelled, along with a second mill to the south of the beck, as Junction and Garden Mill (cotton). Junction Mills was sited within the Site, while Garden Mills was to the south of the beck. Despite their shared labels, the trade directories indicate that the two mills were separate entities, or at least occupied, if not owned, by separate enterprises. Junction Mills had a U-planform, of two ranges and a link structure, orientated east-west parallel to the street and beck. The ranges enclosed a yard area, accessed via a cart passage. Within the western end of the yard a chimney is shown, as well as an L-shaped structure, abutting the southern range, which likely comprised a boiler house. It is possible that any associated engine may have been housed within the western end of the south range at this time, adjacent to the boiler house and chimney: A former large arched opening, now partially infilled, is visible on the building's southern elevation as existing to evidence this. To the south of the mill was a small mill pond, fed by the beck. To the east of the site was a warehouse, which appears to have been associated with the mill at that time, while to the west was a machinery factory recorded as Allan Mill. The subsequent 1908 Ordnance Survey mapping shows little change to the Site (**Plate 3**).

The 1921 Ordnance Survey mapping shows a small square addition within the southeastern corner of the courtyard (**Plate 4**). This extension corresponds with a lift shaft within the existing building.

By 1934, Ordnance Survey mapping depicts Thornton Road widened, resulting in the clearance, in part or in whole, of many of the former mills to its south side, including a large part of Junction Mills (**Plate 5**). The former north range, boiler house, chimney, and courtyard were demolished, while the warehouse to the east was truncated. A new extension was constructed atop the former courtyard area, extending most of the building's breadth, though leaving a small yard to the northwest corner of the Site. The extension formed a new frontage for the mill. The mapping shows no evidence for a replacement engine house, with power likely being electric by this date. West of the Site, the former Allan Mill had been demolished, leaving a vacant plot in its stead.

An aerial photograph of Bradford, also dated to 1934, provides a glimpse of the mill as it was, viewed from the south (**Plate 6**). The building's surviving main range and warehouse can be seen, the main range rising to five storeys with a gable roof. A second aerial photograph, dated to 1938, shows the Site from the northwest (**Plate 7**). The form of the extension can be seen, comprising a hipped-roof range of three storeys.

Subsequent aerial photographs and Ordnance Survey mapping show no changes to the Site.

By 2003, Google Earth imagery shows that the surviving 19th-century range had been truncated, its roof and upper floor removed. The building had been repurposed as part of Bradford College by this time, including photography and printing suites. The mill's former warehouse had been demolished, while the vacant plot to the west of the Site is shown under development for Arkwright House - iQ Student Accommodation Bradford.



In 2015, likely in reaction to demolition of Junction Mills to accommodate a new five storey building including up to 26 flats, retail development (not more than 420sqm) and dental suite, Junction Mills was assessed for designation (planning ref. 15/01032/MAO; Historic England ref. [1427104](#)). The assessment concluded that:

Junction Mill is not recommended for listing for the following principal reasons:

Date: Junction Mill dates to the second half of the C19 and is thus contemporary with a very large number of mills of which only a small proportion representing the best examples are designated;

Alteration: around half of the original mill complex has been demolished. The surviving building, which might be original, was significantly extended in the mid-C20 covering up what would have been its principal elevation, that fronting onto the mill yard.

The building has stood vacant now for some time, while a new use for the building is sought. In April 2020, planning permission was granted for a scheme to convert the building to residential use, though the works never progressed. The building's roof has been damaged, lead stolen, leading to significant water ingress and resultant rot.

2.3.1 Planning History

- Ref. No: 92/06521/REG | Status: Planning permission Granted
Installation of new entrance doors and roller shutter Bradford and Ilkley Community College Thornton Road Bradford
- Ref. No: 05/03742/FUL | Status: Application Granted
Installation of lift enclosure
- Ref. No: 15/01032/MAO | Status: Finally Disposed Of
Demolition of Junction Mills and provision of a replacement five storey building including up to 26 flats, retail development (not more than 420sqm) and dental suite. Approval sought for access, all other matters reserved
- Ref. No: 19/04157/MAF | Status: Refused
Change of use of (D1) former Bradford College Garden Mills and Junction Mills to (C3) residential use to create a total of 112 No apartments, including new floor created within the building with concierge and gymnasium
- Ref. No: 20/00662/MAF | Status: Application Granted
Change of use of (D1) former Bradford College Garden Mills and Junction Mills to (C3) residential use to create a total of 107 No apartments, including new floor created within the building with concierge and gymnasium



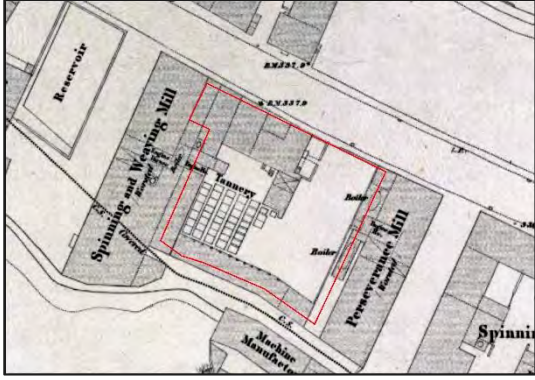


Plate 1: Ordnance Survey Town Plan, 1852

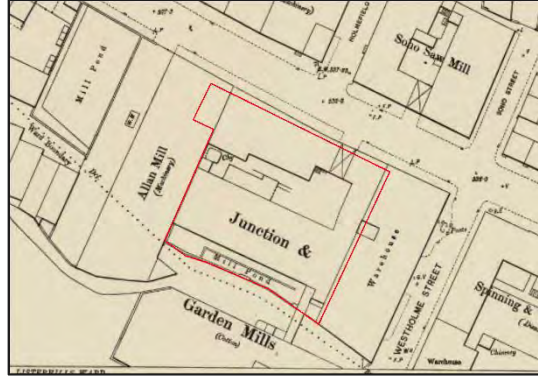


Plate 2: Ordnance Survey Town Plan, 1891

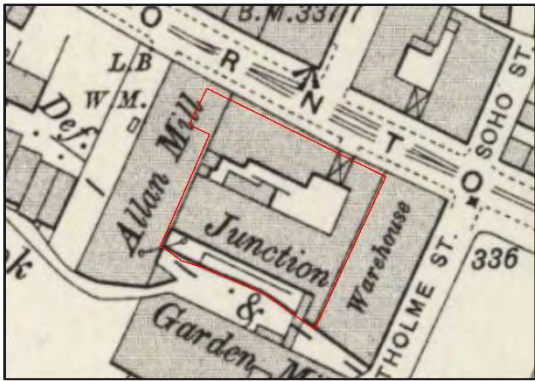


Plate 3: Ordnance Survey, 1908

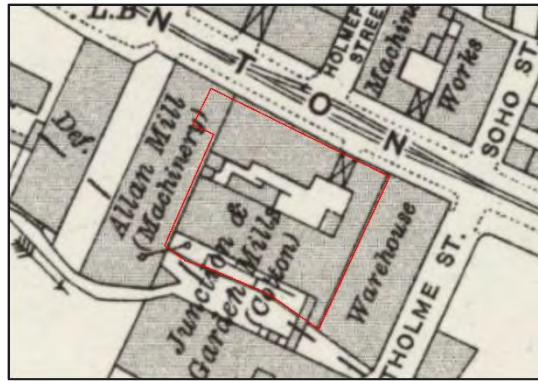


Plate 4: Ordnance Survey, 1921

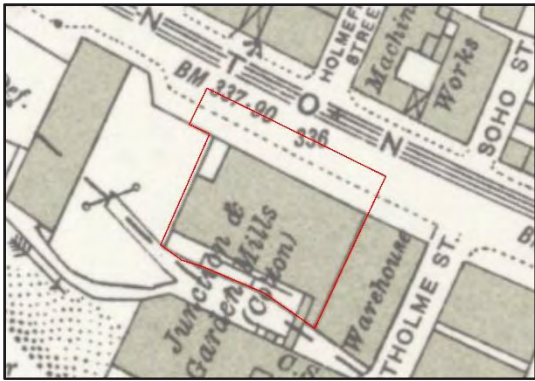


Plate 5: Ordnance Survey, 1934

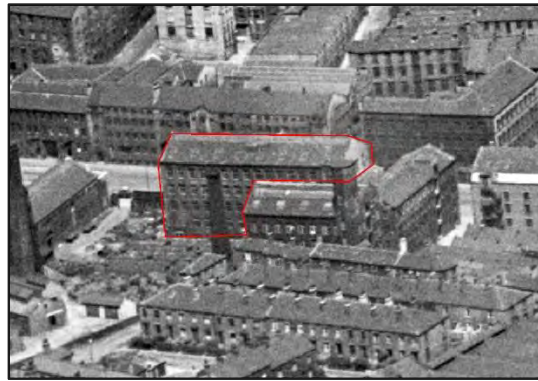


Plate 6: Aerial Photograph, 1934 (Britain From Above EPW045334)

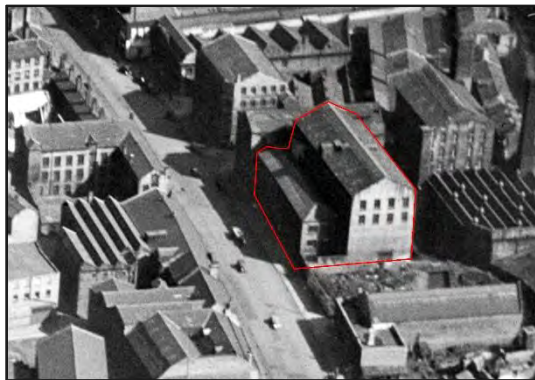
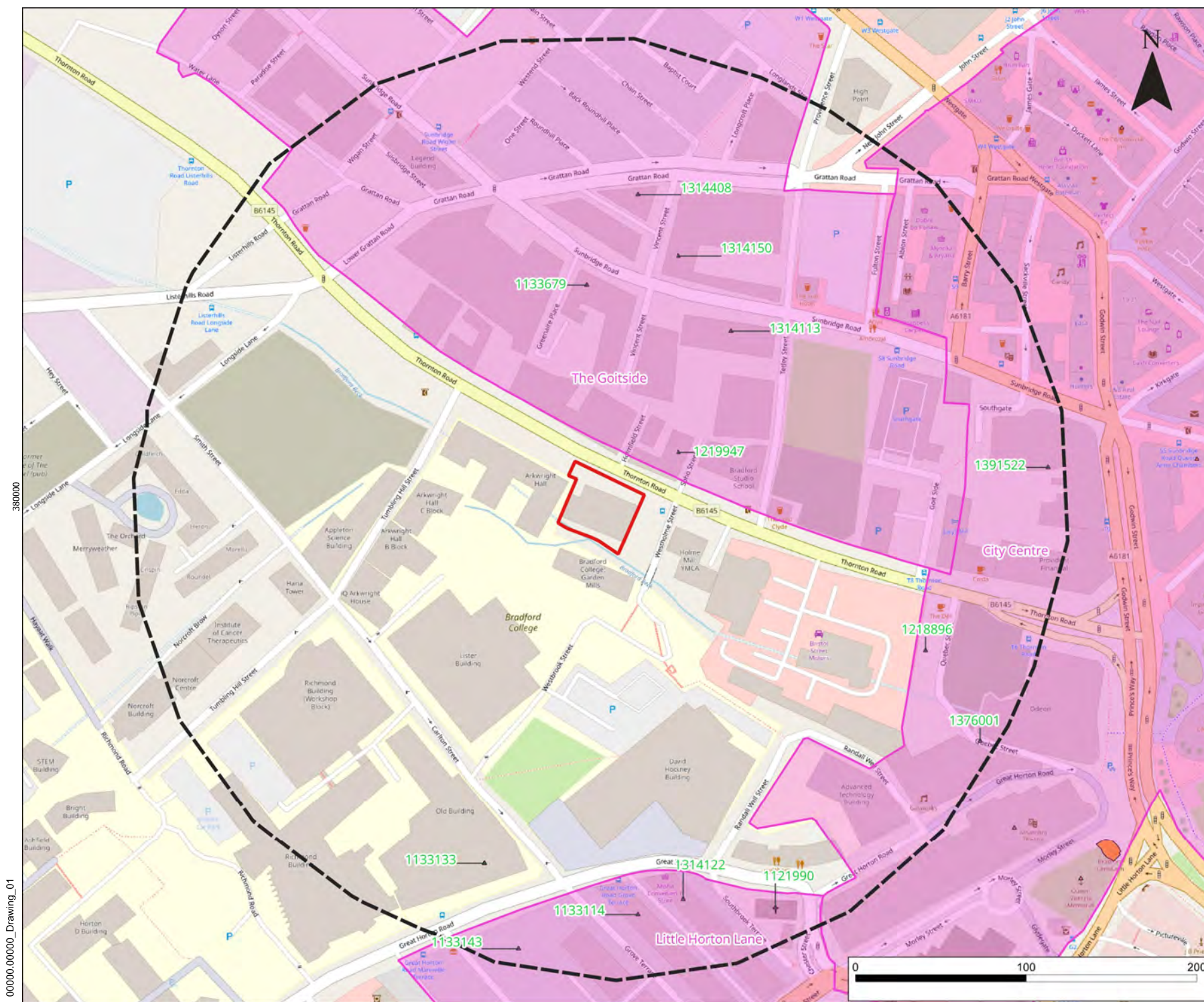


Plate 7: Aerial Photograph, 1938 (Britain From Above EPW057190)



Plate 8: Google Earth, 2003





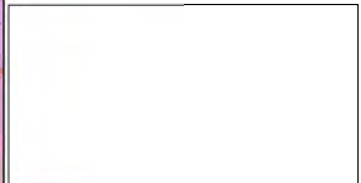
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Key

- Application Boundary
- 250m Study Area
- Grade II Listed Buildings
- Conservation Areas

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Bradford College Future Technology Centre
Heritage Impact Assessment
Designated Heritage Assets

DRAWING 2

Scale 1:2,000@A3 Date September 2023

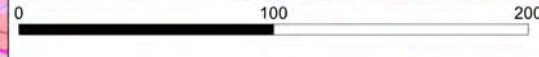




Plate 9: Phased elevations. Orange (Phase 1: 1852 – 1861), Pink (Phase 2: 1852 – 1861), Blue (possible Phase 3), Green (Phase 4: 1921 – 1934)

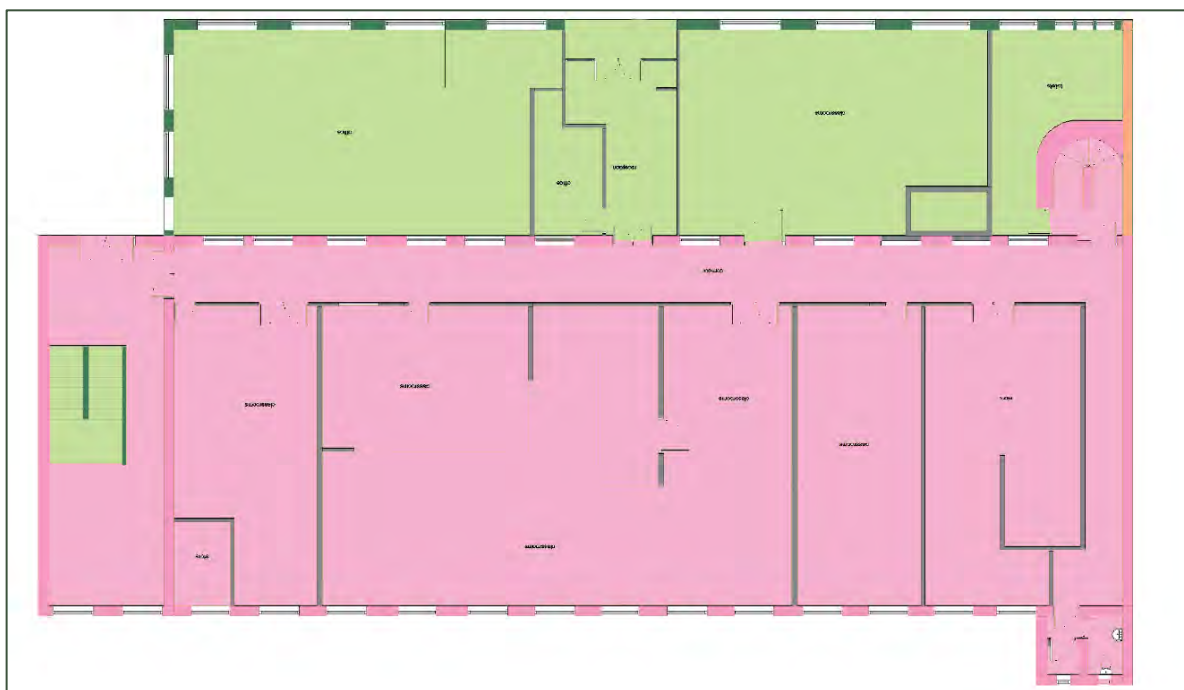


Plate 10: Indicative phased plans (ground floor). Orange (Phase 1: 1852 – 1861), Pink (Phase 2: 1852 – 1861), Green (Phase 4: 1921 – 1934), Grey (Phase 5: late 20th- to 21st century)



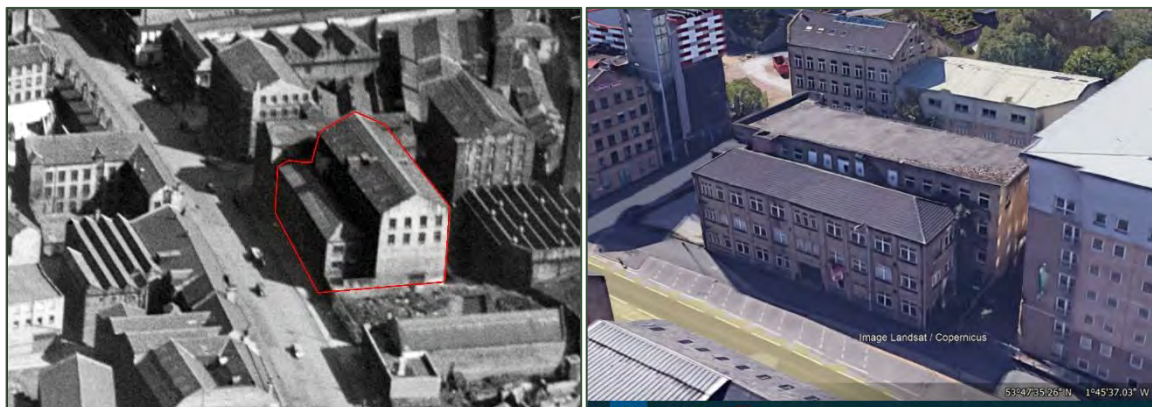


Plate 11: Comparison of aerial views of Junction Mills, showing truncated roof and upper floor of the south range

3.0 Description

3.1 Overview and Phasing

Junction Mills comprises a rectangular-plan former cotton spinning mill, orientated east west, filling the space between Thornton Road and Bradford Beck (**Photos 1 – 3**). The mill features a four-storey range to its south and a smaller three-storey range to its north, and a small, enclosed yard to its northwest, with a basement underlying the much of the building. The basement does not underly the western end of the south range. The building's principal elevation is to the north, facing onto Thornton Road. Indicative phased drawings are presented as **Plates 9 and 10**. Comprehensive photograph coverage of the building is available [here](#). The majority of the building was accessible, though in places the poor condition of flooring precluded access to rooms (particularly to the eastern end of the north range).

The building's southern range is mid- to late 19th-century in date, constructed of local yellow sandstone, brought to regular courses to its exterior. The range has been truncated, resulting in the loss of a former fifth floor and its original gable roof; the existing roof is flat (**Plate 11**). Variation in the range's stonework, visible to its south and east elevations, suggest that the range may originally have been three storeyed when constructed, and was latterly raised to five. The front range dates to between 1921 and 1934 and is brick-built with a steel frame (visible internally), faced with regularly coursed sandstone. The range features a hipped roof clad with Welsh slate. Both ranges feature modern uPVC casement windows and modern plastic rainwater and wastewater goods. There is also evidence for further phasing within the building's eastern elevation, which is discussed in greater detail below.

The building's principal elevation is dominated by the north range, which infilled the original mill's yard area following the widening of Thornton Road (**Photo 4**). The range's north elevation is divided into nine bays by plain pilasters. The easternmost bay features three narrow tripartite openings to each floor, lighting toilets within, with a further rectangular opening to their west, while the central bay features tripartite windows to first and second floor. The remaining bays feature large square window openings. The window openings all feature contiguous stone sills and lintels, interrupted by the pilasters. There are also plain stone brackets at eaves level, carrying a timber gutter. At ground floor level, to the central bay, a wide glazed entrance, protected by a roller shutter, has been created, leading to the building's main lobby. This entrance dates to 1992 (Planning ref. 92/06521/REG). The west elevation of the range features a pair of window openings to each floor. The elevation returns to the north elevation of the south range.

The north elevation of the south range, where it is visible, features regular rectangular window openings with stone sills and lintels, with no further ornamentation. West of the north range, the elevation features a large two-leaf part-glazed timber door set beneath a large stone lintel, accessed off a gated yard area (**Photo 5**). The doorway provides secondary access to the building's interior. Internally, the elevation retains most of its former window openings, now facing into the north range (e.g., **Photo 6**). Some of those former window openings, where not adapted to doorways, blocked, or



reglazed, retain their original glazing: six-pane timber framed casement windows, the top two panes centre-pivot hung (e.g., **Photo 7**).

The building's west elevation is largely blank, having formerly abutted a mill to its west, save for four regular window openings at to its upper floor (**Photo 1**).

The east elevation of the building is also largely blank (**Photo 2**). To its north, the elevation exhibits a mix of stonework, exhibiting the piecemeal redevelopment of the Site, and relating, in part, to the former warehouse to its east. The stonework to the east of the north range differs to its north and west elevations; it appears to incorporate part of the former warehouse range's fabric to its north, as well as fabric relating to the stairwell to the 19th-century south range (see **Plate 9**). The stonework relating to the former stairwell is set back slightly from the main southern range to which it relates. The east elevation of the southern range features four bricked-up window openings to its upper floor, and further bricked-up openings to its southern end, corresponding with toilets within the building. Variation in stonework at the base of the building's upper floor suggests that the building may have been raised at some point, though it also possible that the variation relates to where the former warehouse abutted the range.

The building's southern elevation is divided into sixteen regular bays across each floor, set with rectangular window openings with stone sills and lintels (**Photo 3**). The easternmost bay projects, and is set with pairs of narrow window openings, lighting toilets within. As with the eastern elevation, variation in stonework to the upper floor indicates that the building may have been raised. At the western end of the elevation, to the ground floor, is a former large arched opening, now partially blocked to its top, which rises through to just below second-floor level. This arched opening suggests that this end bay may have formerly formed an integral engine house.

The interior of the building originally comprised large open-plan spinning rooms to each floor of the southern range (e.g., **Photos 8 – 13**). These rooms have since been subdivided with modern studwall partitions to form rooms, relating to the building's most recent function as part of Bradford College. Each floor, owing to its open-plan form and size, was carried atop a series of round-sectioned cast iron columns to the centre of the rooms, running east – west (**Photo 14**). Where visible, each column features a square-sectioned bolting head, for affixing a line shaft, millwork, and other equipment; these have since been boxed in, for the most part, with plasterboard (**Photos 15 – 17**). The top of each column featured a flared bracket, affixed to the beams they carried (**Photo 18**).

Circulation within the building would have been via the surviving stone winder staircase to the northeast of the south range (e.g., **Photos 19 – 21**). Toilets were housed within a projecting bay to its southeast (e.g., **Photos 22 and 23**). A lift was added to the building between 1908 and 1921, constructed west of the staircase, and providing a secondary means of moving equipment and goods between floors (**Photos 24 - 26**). The lift has latterly been fixed at third floor level and is used for plant storage. Circulation through to the northern range is via inserted openings through what were originally window openings for the southern range.

Originally, the building would have been powered by a boiler to the northwest of the southern range, driving an engine housed within the western end of the building, driving line shafts and millwork on each floor in turn. The western end of the building has since been retrofitted, likely around the time the north range was constructed, with a brick-built, dog-leg stair, removing any evidence for transmission here (**Photos 27 and 28**). This stair provides principal access between floors as-existing. A mezzanine floor has been inserted at first-floor level within what was originally a double-height engine ground-floor room (**Photo 29**).

The basement beneath the southern range is similarly divided down its length by cast-iron columns, albeit square-sectioned rather than round (no bolting heads were seen during the site visit, though may be masked by the plasterboard) (**Photos 30 - 32**). The basement features former window openings, possibly lightwells, to its north, though these have since been blocked up with brickwork (**Photo 33**). A single timber-framed nine-pane casement survives at the base of the northeast stair, albeit severely affected by dry rot (**Photo 34**). The space features a stone flag floor. No evidence for plant or fixings remains, save for a single timber mount of unknown function to the western end of the room (**Photo 35**). Modern brick piers have been added within the basement to reinforce the floor above. Access has been formed to the north, providing circulation into the basement beneath the northern range.



The interior of the northern range, similarly, was originally open plan (e.g., **Photos 36 – 38**). The range is accessed via the 1990s lobby at ground floor level, and internally via inserted doorways through former window openings of the northern elevation of the southern range (e.g., **Photos 39 and 40**). The range's upper floor is open to the roof, which retains its original steel trusses. The northern range has also since been subdivided to form offices, etc. Where visible, the range is floored with diagonally laid plank flooring (e.g., **Photo 38**). The basement beneath the north range has been subdivided into smaller stores and workshops with modern studwall partitions (e.g., **Photos 41 – 43**). The basement here features a concrete screed floor, while the floor above, revealed to be a concrete slab, is carried by a series of reinforced concrete beams.

The building exhibits extensive rot, most prevalent to the ground floor and basement at the eastern end of the building and is in poor repair (e.g., **Photos 30, 34, 41, 44, 45**). Evidence for a localised fire was noted to the third floor of the south range, at its eastern end (**Photo 46**).

3.2 Setting

Junction Mills is situated on the south side of Thornton Road and occupies almost the entirety of its existing plot. To its immediate east is a car park, within the site of what was formerly the mill's warehouse. West of the Site is the large seven storey mass of the Arkwright House student accommodation building (**Photo 47**). To the south, the Site looks towards Garden Mills across the Bradford Beck (**Photo 48**). North of the Site is the busy Thornton Road, with long views to the east and west, north of which is the Goitside Conservation Area (**Photos 49 and 50**).

The Goitside Conservation Area is characterised by intensive mill development, crowding the former goit, and extending uphill to the north and west from Thornton Road. Such mill buildings are typically constructed of local sandstone, of four to five storeys, with slate-clad gable roofs. Views north from the Site into the conservation area terminate at the Grade II listed Soho Mill (NHLE 1219947; WYHER ref. MWY5883), the mill building at 108-110 Thornton Road (Holmefield Buildings; WYHER ref. MWY5890), and, via a vista along Holmefield Street, at the derelict Providence Mills building (WYHER ref. MWY11968) (**Photos 51 – 52**). The Site can be seen in views into and out of the conservation area, particularly in vistas north and south along Westholme Street past Garden Mills (WYHER ref. MWY11941) (**Photos 53 – 55**).

3.3 Archaeological Potential

A review of the historic development of the Site indicates that it is unlikely to contain any archaeological remains predating the construction of Junction Mills. Junction Mills occupies the entirety of the Site and is underlain by a substantial basement, including a presumed engine pit beneath the western end of the building. It is likely that the construction of the mill and its basement will have truncated any earlier archaeological remains within its footprint. Assessment of the existing basement indicates little potential for evidence of former plant beneath the existing floor levels. No evidence for the former boiler house, engine house, and chimney were seen within the basement or yard area. However, it is possible that machine bases, a wheel pit, and paraphernalia relating to the former engine may survive beneath the western end of the south range, though it is rare for plant to survive in such instances.

4.0 Statement of Significance

In line with the requirements of paragraph 194 of the NPPF, this section of the report will set out the significance of any heritage assets which might be affected by the proposed development, as well as assessing the significance of Junction Mills itself.

The following assessment is proportionate, in line with the requirements of Paragraph 194 of the NPPF, with the significance of any identified heritage assets and the likely impact of the proposed development. In *Statements of Heritage Significance*, Historic England confirm that it is 'important that the level of detail given in a statement of heritage significance is proportionate to the impact of the proposal' (Historic England 2019: 11), and that 'an analysis of the setting of the heritage asset is only needed where changes to the setting by the proposal would affect the significance of the heritage asset or how that significance is appreciated' (ibid.: 15).



As the impact of the proposed scheme is assessed to be, on balance, neutral to positive, no designated heritage assets other than the Goitside Conservation Area are assessed within this report (see Section 5 of this report). Though the building is situated directly opposite the Grade II Listed Soho Mill (NHLE 1219947), the setting of Soho Mill, in so far as it contributes to its significance, is considered to constitute the area covered by the conservation area. Any impact upon the significance of Soho Mill is likely to be less than or equivalent to the effect of the proposed development upon the significance of the conservation area. It is therefore adequate and proportionate to assess it as part of the Conservation Area.

Though there are several non-designated heritage assets recorded within the WYHER, for the most part they are situated within the conservation area. Any impact to their significance would be no greater than any impact to the conservation area; they are therefore not considered further. The exception to this is Garden Mill, situated outwith the conservation area, which forms an historical pairing with Junction Mills on historic mapping, and shares a functional association as a former cotton spinning mill (WYHER ref. MWY11941).

Junction Mills comprises a non-designated heritage asset of low significance only and is recorded in the WYHER (WYHER ref. MWY12020). Though the building retains some historic fabric relating to the original mid- to late 19th-century mill, the greater part - more than 50% by area - of the original mill as shown on historical mapping, including a former boiler house, chimney, north range, and warehouse, has been demolished to accommodate the widening of Thornton Road and the creation of the existing north range between 1921 and 1934. In addition, the upper floor and roof of its south range was demolished between 1938 and 2002. Subsequent alterations to planform and function, including the replacement of the building's windows with modern uPVC units and installation of plastic rainwater goods have further eroded the building's authenticity and architectural significance. Further loss of significance has occurred as a result of extensive water ingress and resultant well-progressed dry rot, particularly at the eastern end of the building. The building retains no extant machinery relating to its original function, and nearly all evidence for power transmission has been lost, save for the cast iron columns to each floor of the south range. The south range retains a modicum of its original planform and circulation, albeit this has been impacted to a degree by subdivision and the insertion of the stair to the west end of the building. The building exhibits some evidence for phasing in its external elevations, illustrative of the changing role and fortunes of the mill over the course of the later 19th and 20th centuries. Otherwise, the external appearance is of little architectural note, especially when compared with some of the more ornate or better-preserved mill buildings within the surrounding area (such as the Holmefield Buildings or Soho Mill). The building's residual significance derives from its few surviving architectural features, primarily the evidence of construction phasing and the cast-iron columns which illustrate its former function. On the whole, however, the building is architecturally unremarkable, and its north range is of no heritage significance.²

The building's historic interest is also limited, being broadly illustrative of the boom and bust of Bradford's 19th and early 20th-century cloth and wool industry, with no known direct associations with any notable historic figures or events.

Setting makes a minor contribution to the significance of Junction Mills, in particular the building's spatial and functional association with the non-designated Garden Mills to its south, and with the larger collection of 19th-century mills to the north, within the Goitside Conservation Area. These buildings provide historical context which contributes to an understanding of the development, siting, function, and form of Junction Mills. Those contributions have been diminished by the significant changes to the character of Thornton Road through the mid- to late 20th century, including the clearance of large parts of the south side of the road, and the introduction of architecturally poor modern schemes such as the adjacent iQ student accommodation building. Other diminishing factors include the changes in use within the area, including Junction Mills, and the dereliction of many of the remaining mill buildings.

In turn, Junction Mills makes a minor contribution to the significance of the Goitside Conservation Area and Garden Mills as part of their setting. The building is of similar scale, materiality, date, and

² The bar for a building to qualify as a non-designated heritage asset is high. Planning Policy Guidance is clear that: *A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.* (Paragraph: 039 Reference ID: 18a-039-20190723)



historical function to many of the mills which characterise the conservation area, thereby contributing, at least thematically, to an understanding of the area's historical development. Nevertheless, the significant alterations to Junction Mill, its diminished architectural interest, and unsympathetic alterations the south side of Thornton Road, limit those contributions. The *Goitside Conservation Area Assessment* concurs with this assessment, stating (Bradford District Council 2005: 31):

The southern edge of the boundary follows the line of Thornton Road, including only those buildings on the northern side of the road and excluding Thornton Road itself. Though the Technical College and former mill on the bend of Westhouse [Westholme] Street display some strength of character and share common characteristics with the buildings on the opposite side of Thornton Road, the area as a whole has been subject to wide scale redevelopment and therefore is not considered to display the strength of character necessary to warrant inclusion within the conservation area boundary.

The special architectural and historic interest of the Goitside Conservation Area is set out within two documents prepared by Bradford District Council: the *Goitside Conservation Area Assessment*, 2005, and the *Goitside Conservation Area Appraisal*, 2007 (op cit.).

Garden Mills is a non-designated heritage asset of low to moderate significance, retaining a greater degree of its original planform and external appearance to Junction Mills (its interior was not assessed as part of this assessment). The building has a degree of group value with Junction Mills, for reasons set out above.

4.1 Archaeological Significance

It is likely that the construction of Junction Mills, particularly the excavation of its basement, will have truncated any earlier archaeological remains within its footprint, thereby precluding the potential for any archaeology predating the existing mill building. Spinning mills are unlikely to be associated with significant below-ground features, other than perhaps channels or drainage features. The western end of the building may retain evidence for former machine bases, a wheel pit, and paraphernalia beneath the existing floor level, which might contribute to an understanding of transmission and the design of the mill as constructed (e.g., engine size can be extrapolated based on wheel pit size, etc.). Should any such features survive, their significance would likely be low, being contingent upon their ability to contribute to our understanding of the function of the mill. The probability for encountering any archaeological remains of national importance, such as would preclude development, within the Site area is nil.

5.0 Proposed Development

The proposed Future Technologies Centre project proposes the construction of a high-quality new build to provide dedicated facilities to support the needs of Automotive and Engineering curriculums, within the curtilage of the main College campus. The works are part of the wider strategy for the College's estate to improve the wider complex's condition, improve spatial efficiency and create specialist facilities to support the delivery of Higher Skills.

The scheme includes for:

- Creation of a new build facility, approximately 3000m² over four floors, to accommodate automotive and advanced engineering provision;
- Supporting development of training and skills for new technologies across the automotive and engineering industries, including the move to electric and hybrid technologies; and
- Enabling the College to vacate the currently leased-out poor quality remote Bowling Back Lane facilities used for automotive training.

6.0 Impact Assessment and Justification

The existing mill building would not provide sufficient capacity for the proposed new Future Tech Centre for Bradford College, at least not without substantial alteration, to a degree that the greater part of the building and any embodied significance would be lost, at a disproportionate cost. The existing mill building is in very poor repair, with extensive dry rot evident during the Site visit. In



addition, asbestos-containing materials have been used extensively within the existing building. The retention of Junction Mills would present a significant conservation deficit, where the costs of retention would likely far outweigh the benefits of the building's restoration; any such scheme, as with the formerly approved residential development for Junction Mills, would likely prove unviable.

The proposed scheme presents an opportunity to replace the existing, architecturally unremarkable structure with a bold new building, designed with a contemporary appearance which draws upon the local materiality, massing, and character to provide a fit-for purpose new college building, at a key transitional point between the Goitside Conservation Area and Bradford College campus.

The demolition of the existing mill would result in the total loss of a non-designated heritage asset of low significance. NPPF paragraph 203 states that 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. The greater architectural interest of the proposed development, the public benefits inherent in enhancing Bradford College's educational offering and meeting the objectives of the Bradford City Centre Area Action Plan 2017,³ and the aesthetic enhancements to the setting of the Goitside Conservation Area, are such that any harm should be outweighed.

The proposed scheme has been designed to respect the character, form, and scale of development within the Goitside Conservation Area, and clearly references key elements of the existing building's form and layout. Though the loss of Junction Mills would result in the loss of a building which makes a minor contribution, at least thematically, to the significance of the conservation area and Garden Mills as part of their setting, the aesthetic enhancements to the heritage assets' setting offered by the proposed scheme are such that any change is likely to have a neutral to positive impact. Additionally, the scheme, though not sited within the Conservation Area itself, presents an opportunity to address one of its identified weaknesses, namely the lack of activity and animation to streets (Bradford District Council 2007: 6); the proposed scheme will create a new active frontage along Thornton Road. Consequently, it is considered that the proposed development would preserve the setting of the Goitside Conservation Area and any heritage assets within its boundary. The loss of group value with Garden Mills would result in very low-level harm to Garden Mills' significance as a non-designated heritage asset, though the greater part of its significance, as embodied in its built form, would be conserved.

On balance, the scheme is compliant with the relevant heritage considerations as set out under Policy EN3 of the Bradford District Core Strategy DPD 2017, the NPPF 2023, and those set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990* (hereafter the 'Planning Act'). The council should be minded that, where proposals will preserve or enhance the character and appearance of a conservation area or listed building, the proposed development should be treated favourably.

In line with Paragraph 205 of the National Planning Policy Framework (NPPF) 2023, it is recommended that a scheme of historic building recording be conducted to document the building should its demolition be approved, thereby mitigating-by-record its total loss of significance.

6.1 Archaeological Impacts

It is likely that any archaeological remains relating to Junction Mills will be removed as part of the proposed development, resulting in a complete loss of significance. The probability of encountering significant remains predating the mill is negligible; it is unlikely such remains would be impacted. The probability for encountering any archaeological remains of national importance, such as would preclude development, within the Site area is nil.

7.0 Conclusion

This report has assessed the significance of Junction Mills, Bradford, concluding that it comprises a non-designated heritage asset of low significance only. The building's residual significance derives

³ The scheme would contribute to meeting the objectives of the Bradford City Centre Area Action Plan 2017, in particular Objective 6 – 'An enhanced high education campus, with the University and College forming an integral part of the city centre'.



from its few surviving architectural features, primarily the evidence of construction phasing and the cast-iron columns which illustrate its former industrial function. On the whole, however, the building is architecturally unremarkable, and its north range is of no heritage significance. Though the building retains some historic fabric relating to the original mid- to late 19th-century mill, the greater part - more than 50% by area - of the original mill has been demolished to accommodate the widening of Thornton Road and the creation of the existing north range between 1921 and 1934. In addition, the upper floor and roof of its south range was demolished between 1938 and 2002. Subsequent alterations to planform and function, including the replacement of the building's windows with modern uPVC units and installation of plastic rainwater goods have further eroded the building's authenticity and architectural significance. Further loss of significance has occurred as a result of extensive water ingress and resultant well-progressed dry rot, particularly at the eastern end of the building. The building retains no extant machinery relating to its original function, and nearly all evidence for power transmission has been lost, save for the cast iron columns to each floor of the south range.

Junction Mills makes a minor contribution to the significance of the Goitside Conservation Area and the nearby Garden Mills, a non-designated heritage asset, as part of their setting. Nevertheless, the significant alterations to Junction Mills, its diminished architectural interest, and unsympathetic alterations the south side of Thornton Road, limit those contributions.

The demolition of the existing mill would result in the total loss of a non-designated heritage asset of low significance. However, the greater architectural interest of the design of the proposed development, the public benefits inherent in enhancing Bradford College's educational offering and meeting the objectives of the Bradford City Centre Area Action Plan 2017, and the aesthetic enhancements to the setting of the Goitside Conservation Area, are such that any harm should be outweighed. It is considered that the proposed development would preserve the setting of the Goitside Conservation Area and any heritage assets within its boundary. The loss of group value with Garden Mills would result in very low level harm to Garden Mills' significance as a non-designated heritage asset, though the greater part of its significance, as embodied in its built form, would be conserved.

As it stands, the scheme is compliant with the relevant heritage considerations as set out under Policy EN3 of the Bradford District Core Strategy DPD 2017, the NPPF 2023, and those set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990* (hereafter the 'Planning Act'). The council should be minded that, where proposals will preserve or enhance the character and appearance of a conservation area or listed building, the proposed development should be treated favourably.

The Site may be underlain by archaeological remains relating to Junction Mills, such as drainage features, and possible machine base and associated features and paraphernalia at the western end of the building. Should any such features survive, their significance would likely be low, being contingent upon their ability to contribute to our understanding of the function of the mill. It is likely that any archaeological remains relating to Junction Mills will be removed as part of the proposed development, resulting in a complete loss of significance. The probability of encountering significant remains predating the mill is negligible: it is unlikely such remains would be impacted. The probability of encountering any archaeological remains of national importance, such as would preclude development, within the Site area is nil.



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Photo 1: North and west elevations of Junction Mills



Photo 2: North and east elevations of Junction Mills





Photo 3: South elevation of Junction Mills



Photo 4: North and east elevations of Junction Mills





Photo 5: Yard and door to south range, facing south



Photo 6: Windows to former north elevation of the south range, facing northwest (second floor)





Photo 7: Retained window in former north elevation of the south range, facing north (second floor)



Photo 8: Ground floor corridor of the south range, facing east – note partitions

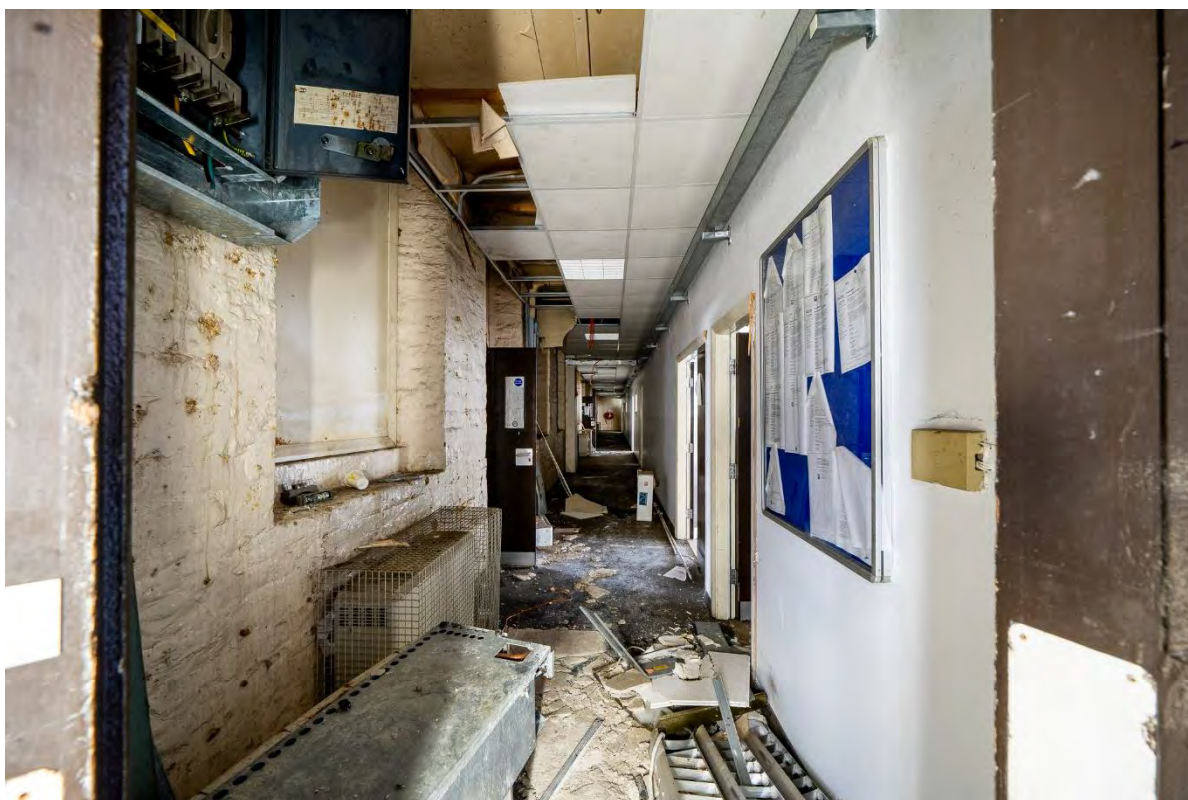


Photo 9: First floor corridor of the south range, facing east – note partitions





Photo 10: First floor open-plan room of the south range, facing southeast – note partitions and boxed columns



Photo 11: Second floor open-plan room of the south range, facing west





Photo 12: Third floor western room of the south range, facing east – note partitions



Photo 13: Third floor eastern room of the south range, facing southwest – note exposed columns





Photo 14: Row of columns to the second floor of the south range, facing west



Photo 15: Boxed-in first floor column





Photo 16: Partially exposed ground-floor column



Photo 17: Exposed third-floor column



Photo 18: Exposed bracket to head of column (third floor)



Photo 19: Winder stair, view down to basement





Photo 20: Winder stair (ground floor)



Photo 21: Winder stair (third floor)



Photo 22: South range toilets (second floor)



Photo 23: South range toilets (first floor)





Photo 24: Lift (basement)



Photo 25: Lift (basement)



Photo 26: Lift interior (third floor)



Photo 27: Main stair within the western end of the south range, facing south (ground floor)



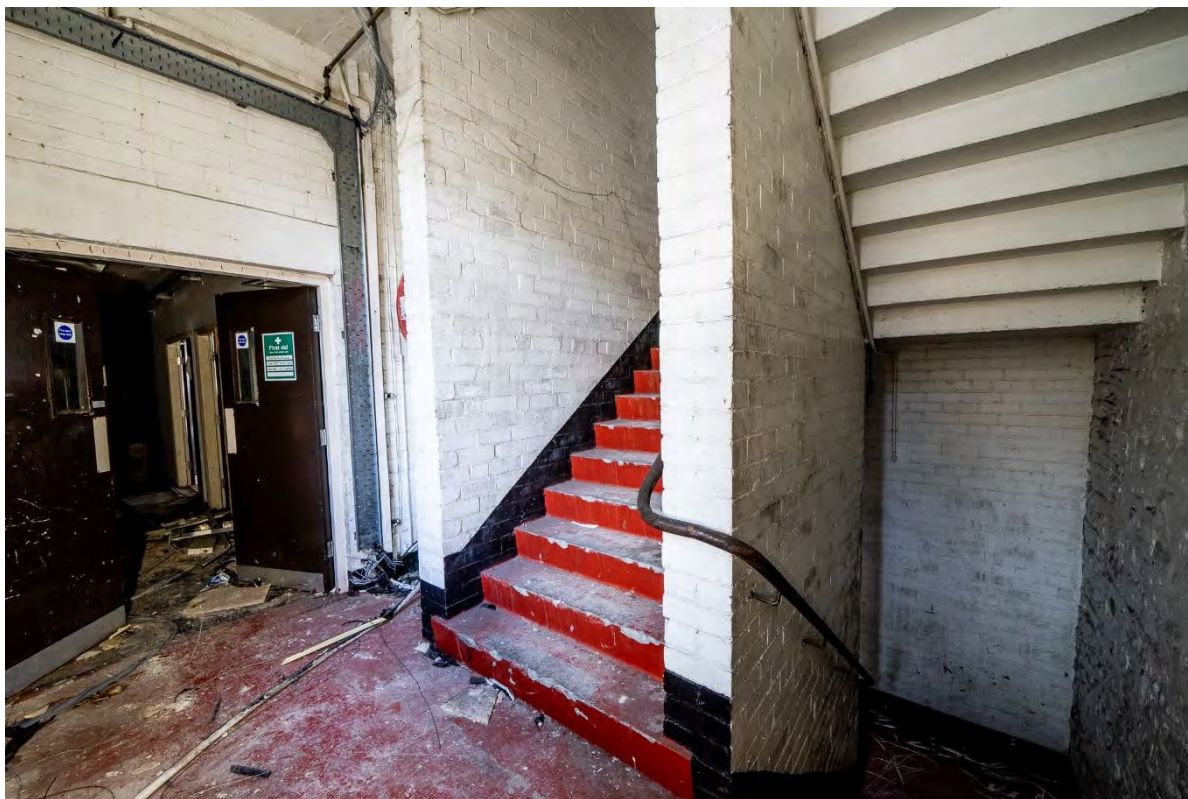


Photo 28: Main stair within the western end of the south range, facing south (first floor)



Photo 29: Interior of mezzanine room within the former engine house, facing south





Photo 30: Overview of basement below the south range, facing southwest. Note the extensive rot and modern brick pier



Photo 31: Overview of basement below the south range, facing east





Photo 32: Column in basement



Photo 33: Window / lightwell openings within the basement, facing northwest





Photo 34: Detail of original window in basement, facing east



Photo 35: Possible plant base in basement





Photo 36: Western room of north range (ground floor)



Photo 37: Rooms within the first floor of the north range, facing northeast





Photo 38: Open-plan second floor of the north range, facing east



Photo 39: Modern lobby, facing north



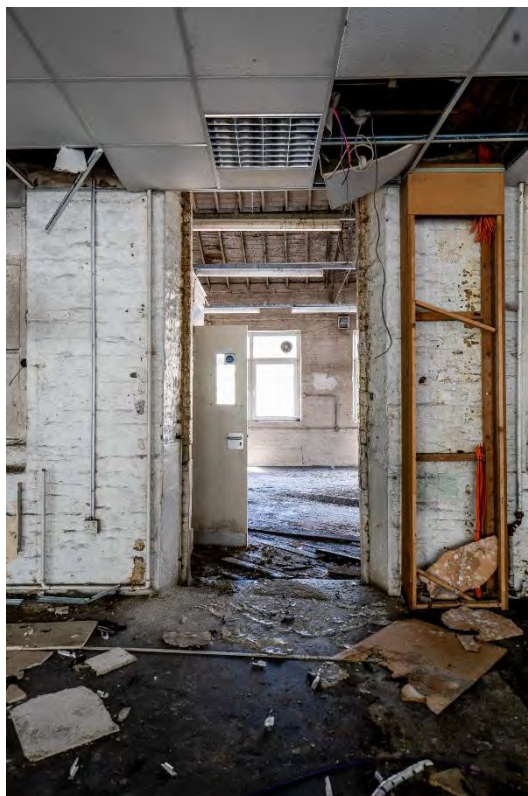


Photo 40: Inserted opening into the north range (second floor)



Photo 41: Northeast room of the north range basement, facing east. Note the extensive rot





Photo 42: Central rooms of the north range basement, facing northwest

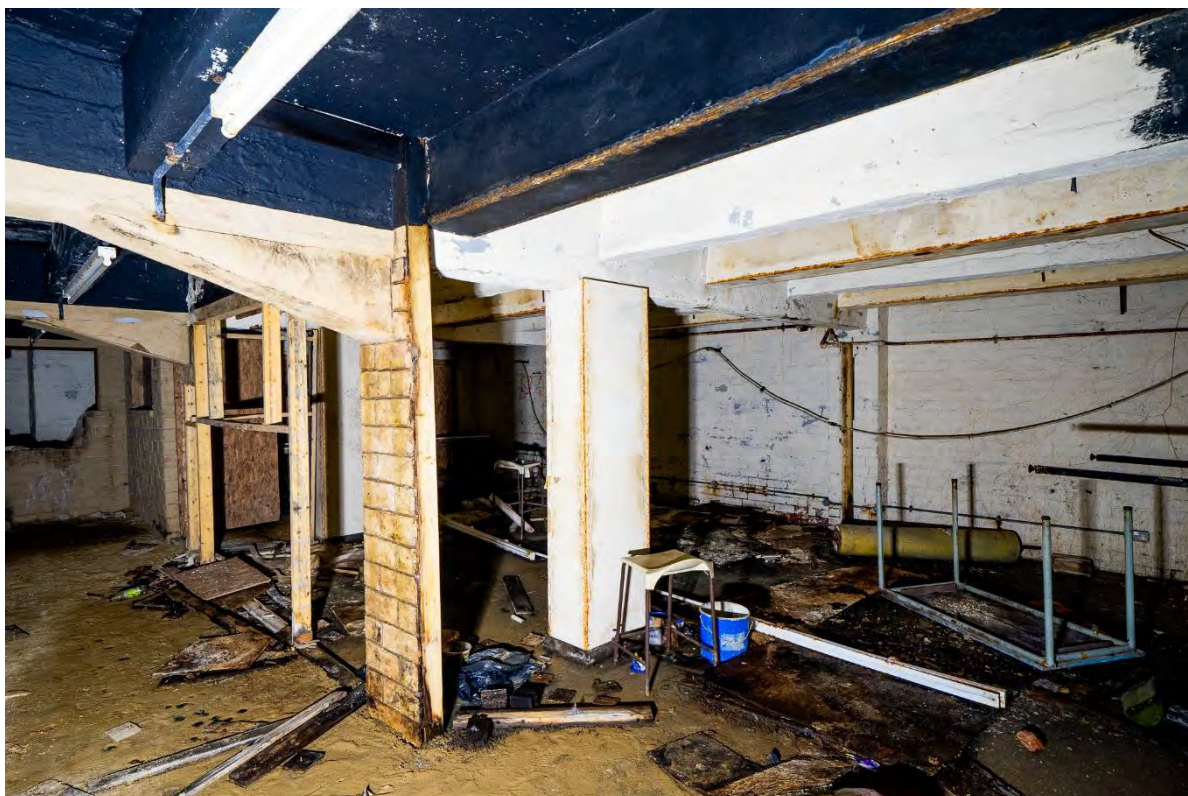


Photo 43: Western room of the north range basement, facing southeast





Photo 44: Extensive dry rot at eastern end of the north range (ground floor), facing northwest



Photo 45: Dry rot at the base of the 19th-century stair within the basement, facing north

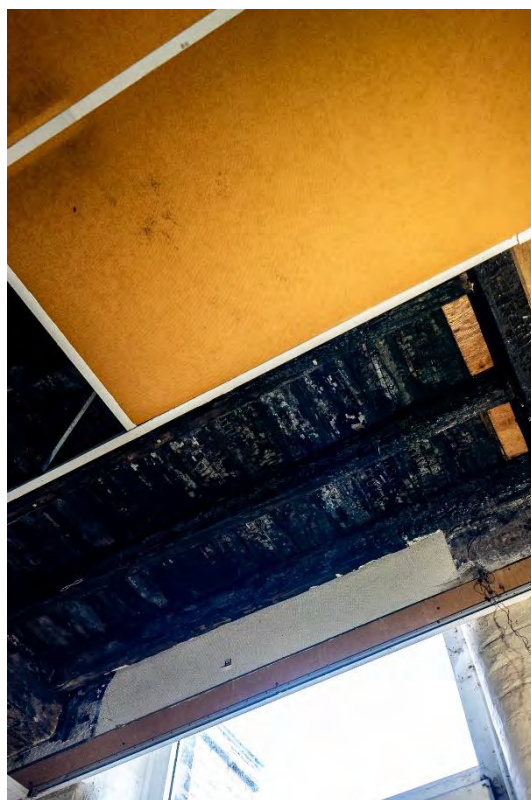


Photo 46: Fire-damaged ceiling at the eastern end of the third floor, facing north





Photo 47: View southwest to the Site and Arkwright House



Photo 48: View west along Bradford Beck between the Site and Garden Mills





Photo 49: View to the Site and east along Thornton Road



Photo 50: View west past the Site along Thornton Road





Photo 51: View northwest to Soho Mill and Holmefield Buildings from Westholme Street



Photo 52: Vista north along Holmefield Street





Photo 53: View south past the Site to Garden Mills, with the college campus beyond



Photo 54: View northwest past the Site from Westholme Street towards Soho Mill





Photo 55: View northwest from Westholme Street past Garden Mill to the Site (centre left) and conservation area



Appendix A Relevant local planning policy

Bradford District Core Strategy DPD 2017

Policy EN3: Historic Environment

The Council, through planning and development decisions, will work with partners to proactively preserve, protect and enhance the character, appearance, archaeological and historic value and significance of the District's designated and undesignated heritage assets and their settings.

This will be achieved through the following mechanisms:

A. Ensure the protection, management and enhancement of the Outstanding Universal Value (OUV) of the Saltaire World Heritage Site through the implementation of the Saltaire World Heritage Site Management Plan and associated documents.

B. Require development proposals within the boundary of Saltaire World Heritage Site Saltaire or within its Buffer Zone to demonstrate that they will conserve those elements which contribute towards its OUV, including its setting and key views.

C. Require that all proposals for development conserve and where appropriate, enhance the heritage significance and setting of Bradford's heritage assets, especially those elements which contribute to the distinctive character of the District, specifically:

- 1. The nationally important prehistoric rock art of Bradford's upland areas.*
- 2. The nationally important industrial heritage relating to the textile industry, particularly the mills, chimneys, commercial buildings, public buildings, and associated housing and settlements, the legacy of public parks, gardens, landscapes and cemeteries.*
- 3. The pre-industrial townscape and distinctive architectural styles and palette of materials of the District's towns and villages, the Victorian townscape of the expanded towns such as Bradford, Ilkley and Keighley.*
- 4. The spatial qualities, building form, plot sizes, open spaces, trees and identified significant views of the urban areas, semi-rural villages and suburban developments, including at Heaton Estates, Devonshire Park and Middleton.*
- 5. The heritage assets associated with transport including historic bridges, and the structures and character of the Leeds and Liverpool Canal.*
- 6. The literary and other associations of Haworth and conservation areas of Thornton with the Bronte family.*

D. Where possible the original use of a listed building should be retained or continued. Where this is no longer viable or appropriate or where without an alternative use the listed building will be seriously at risk, the Council will grant permission for an alternative use if it can be demonstrated that:

- 1. The alternative use is compatible with and will preserve the character of the building and its setting.*
- 2. No other reasonable alternative exists which would safeguard the character of the building and its setting.*

E. The alteration, extension or substantial demolition of a listed building will only be permitted if it can be demonstrated that the proposal:

- 1. Would not have any adverse effect upon the special architectural or historic interest of the building or its setting.*
- 2. Is appropriate in terms of design, scale, detailing and materials.*
- 3. Would minimise the loss of historic fabric of the building.*
- 4. Or if there is harm to the special interest of the building, that this is outweighed by the public benefits of the proposal.*



F. Require proposals to protect or enhance the heritage significance and setting of locally identified non designated heritage assets, including buildings, archaeological sites and parks, landscapes and gardens of local interest.

G. Require proposals to respect and reinforce the distinctive character of the part of the District within which they are located. Account must be taken of guidance adopted by the Council, particularly Conservation Area Appraisals and Reviews, the Shopfront Design and Security Guides and other guidance documents.

H. Encourage heritage-led regeneration initiatives especially in those areas where the historic environment has been identified as being most at risk or where it can help to facilitate the re-use or adaptation of heritage assets.



Appendix B Methodology and Glossary of Key Terms

Methodology

Standards

The assessment has been undertaken in accordance with all relevant statute, policy, and guidance. The assessment has been project managed and undertaken by Seth Price, Associate Heritage Consultant (ACIfA, AssocIHBC).

The assessment was signed off by Dr Emma Wells, Technical Director - Historic Buildings (MCIfA, FSA).

Site visit

A site inspection was undertaken on 30th August 2023 to assess the site within its wider landscape context. A settings assessment was also undertaken during the site visit, including visits to all nearby heritage assets.

Study area

A 250-metre study area was used to create a baseline for assessment, factoring any heritage assets beyond 250 metres where any meaningful visual, spatial, thematic, or historic functional association was identified.

Sources

The West Yorkshire Historic Environment Record⁴ (WYHER) and relevant map and document resources were consulted during the preparation of this report. The National Heritage List for England (NHLE) was consulted to provide information on scheduled monuments, registered parks and gardens, registered battlefields, and listed buildings. Available published and unpublished documents were consulted, and historic land-use has been reconstructed. Sources consulted are listed in the Bibliography section at the end of the report.

Key Terms

Heritage assets

The NPPF defines heritage assets as: *...a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).*

Significance

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. For World Heritage sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.*

Current national guidance for the assessment of the significance of heritage assets expresses significance in terms of 'interests', as used within this report, and as per the NPPF definition (see *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England 2019). Interests are analogous with 'special interest' as used within the Planning (Listed Buildings and Conservation Areas) Act 1990, and with the 'values' as set out in Historic England's *Conservation Principles, Policies and Guidance* (English Heritage 2008). The interests set out under the NPPF include:

⁴ The West Yorkshire HER was contacted on the 24 August 2023, with further subsequent attempts. No response was received however. The [Heritage Gateway detailed search](#) was used in the interim to allow for consultation of all relevant HER entries within the study area.



- *Archaeological Interest: 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 and Artistic Interest: 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 skill, like sculpture.*
- *Historic Interest: 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.*

These interests should not be seen as prescriptive, but rather as a guide for understanding the significance of a heritage asset; for example, a heritage asset may have interests beyond the scope of archaeological, architectural, or historic interest – they may have communal value or may be significant for their group value, etc.

This assessment was also informed by the advice published by Historic England in the document entitled *Managing Significance in Decision-Taking in the Historic Environment: Good Practice Advice in Planning Note 2* (2015).

Setting

The NPPF defines setting as: *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.*

The setting assessment within this report was guided by the recommendations outlined in *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning. Note 3* (Historic England 2017), which align with the general EIA process. The guidance advocates a staged approach to the assessment of the effects of development on the significance of heritage assets due to a change within their setting, using a five-step process:

Step 1: Identify which heritage assets and their settings are affected by the proposed development

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow their significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance of the identified heritage assets, or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm to that significance

Step 5: Make and document the decision and monitor outcomes

Harm

Potential development effects (impacts) to heritage assets are discussed in terms of 'harm', with reference to the NPPF (2023). Harm, in heritage terms, relates to a negative effect stemming from a change which results in a diminishment of the significance of a heritage asset. The NPPF allows that harm may be either substantial or less than substantial and may vary within each category. How harm is assigned will trigger differing tests under the NPPF. Where harm to a designated heritage asset, or a non-designated heritage asset of equivalent significance, is identified, it must be given great weight



in the planning decision. While it is up to the decision maker to determine the nature and degree of harm, they must take into account necessary expertise, and the particular significance of any heritage asset which may be affected (NPPF paragraph 195).

- *Substantial harm (or total loss of significance)*
An impact which results in a ‘...total loss of significance...’ (NPPF paragraph 201). The National Planning Policy Guidance sets out that substantial harm... ‘...is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting’. Substantial harm can be defined as having ‘...such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced’⁵; and
- *Less than substantial harm*
Being any lesser level of harm than that defined above; recent case law has confirmed that this includes any level of harm (not considered substantial) regardless of its quantification, e.g., the finding of a ‘negligible’ level of harm to a designated heritage asset must still be treated as less than substantial harm and be weighed in the balance under paragraph 202.

The PPG provides that the category of harm identified for any given asset be ‘explicitly identified’, and that the extent of that harm be ‘clearly articulated’. For purposes of this assessment, this is done with reference to a ‘spectrum’, e.g., at the lower/upper end of the spectrum of less than substantial.

Where an impact, or harm to, the significance of a non-designated heritage asset is identified, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Where there is no harm to a heritage asset, an impact may be neutral or may enhance its significance.

As clarified in the High Court, preservation does not mean that change is not possible; it specifically means no harm. This is echoed in GPA 2, which states that ‘*Change to heritage assets is inevitable but it is only harmful when significance is damaged*’.

⁵ *Bedford Borough Council v Secretary of State for Communities & Local Government & Anor* [2008] EWHC 2304 (Admin).





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