



**HUDDERSFIELD**

**CIVIC**

**SOCIETY**

**CHARITY NO 242397**

---

## **KIRKLEES CULTURAL HEART (KCH) - PLANNING APPLICATION (2022/93248)**

The proposed development introduces welcome, visitor focused, facilities with the stated objective of drawing in many new visitors to reinvigorate the town centre. Clearly, this must deliver a substantial increase in visitor traffic, or the KCH project will fail. The application also indicates the creation of jobs for c300 FTE employees. What is less clear, is how this application demonstrates the conclusion that such a scheme will provide the outcome of stimulating the adjacent areas within the town centre.

### **1. Demolition of Retail Units on King Street.**

HCS is concerned that proposals show a park entrance from King Street requiring demolition of both Boots and WH Smiths retail units. This would have a detrimental effect on the retail offer and the status of King Street as a prominent and important street for shopping. Boots serves as an important anchor store in an area that commands some of the highest footfall in the town centre.

The National Planning Policy Framework 'Building a strong, competitive economy' (Chapter 6) states, *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.'* Chapter 7'. Ensuring the vitality of town centres' refers to the provision of positive strategies for town centres and primary shopping areas.

The proposed demolition ignores the importance of retaining these key elements, which help sustain the economic value of retailing, and provide and safeguard employment opportunities. It should be noted that there is some indication to suggest local residents are increasingly visiting Halifax, partly as a result of the closure of M&S in Huddersfield. Further closures could exacerbate this loss.

**HCS Challenge: How this loss is both justified and/or being addressed by discussions on alternative premises to retain these key retailers?**

## **2. Elevational Details**

### **2.1 Art Gallery:**

Although HCS welcomes the indication that the Art Gallery facades, along Queen Street, are to be constructed of stone (Design and Access Statement 6.5.1)

**HCS Request: A specific condition be placed on those elevations that face the fine, late Georgian buildings along Queen Street to ensure the use of local York sandstone in an appropriate form.**

### **2.2 Venue and MSCP**

Whilst HCS recognise the challenge in incorporating a large events venue and car park into one building, there remain concerns regarding its monolithic appearance in relation to views from further afield (say from the direction of Castle Hill), and in relationship to St. Paul's and the Ramsden Buildings on the University Campus. Elevations, although incorporating pleats, ribbing, folds and other devices remain somewhat bland.

**HCS Comment: The use of ceramic facings may provide a means to enliven what might otherwise come over as 'corporate beige', as would incorporation of public art (see point 2.4 below). Concern remains about the longevity of the 'subdued perforated metal' on the ground floor area of the car park onto Queensgate.**

### **2.3 Food Hall**

The 'solid and robust' (D&A Statement 4.11) wall of the food hall, beneath the Fritz Stellar panels, shows it to be 'pierced' by new openings. It is important that the dimensions and framing of these openings do not detract from the visual qualities of the panels. Additionally, the existing steps leading down to the Ring Rd, were refurbished a few years ago to preserve the detailing of the original design.

**HCS Request: Clarification be provided that the Fritz Stellar features, stairs etc are to be retained and that the new openings do not have an adverse impact on the listed structures.**

### **2.4 Percent for Art**

The Heritage Impact Assessment identifies the importance of urban artwork, and sculptural features, stating that '*Huddersfield has a tradition of public art*'. For example, 'The Appraisal of Significance' for the Queensgate Market building states, '*The sculpture 'Commerce' holds architectural and aesthetic significance. It is an important example of mid-century public art procured as part of a commercial development.*' Furthermore, the HIA 'Assessment of Setting – Public artwork' states, '*The pre-eminence of artworks within the site is an extension of this wider civic approach that embraces cultural expression through public art.*'

**HCS Request:** To enhance the 'Cultural Heart' any approval should include a requirement for a '1 Percent for Art Scheme' which would require 1% of the cost of any publicly funded capital, infrastructural and building development to be allocated to the commissioning of appropriate artwork, to be incorporated into external facades and spaces within the scheme.

### **3. Parking Provision:**

#### **3.1 Lack of Data**

Overall visitor numbers have not been supplied for any of the proposed facilities within the development. A rate payer funded project, such as this, should not be considered for approval without a supporting business plan demonstrating the visitor numbers required to support financial viability of the development.

**HCS Strong Objection:** Without key evidence of viability, Councillors do not have sufficient evidence to decide on approval of the plans and/or its related spend. The recent interest rate changes, inflation in material costs and reduced appetite for risk (both for developers and investors) has increased the risks associate with KCH.

Whilst reference is made to the demolition of the former Alfred St Multi Storey Car Park (MSCP), which eliminates 588 parking spaces, no proposition has been included on how such 'lost' parking is to be replaced. This former car park stood, within the development site, served visitors for the adjacent 1200 seat Town Hall events, the c300 seat adjacent LB Theatre events, unquantifiable University events (including graduation ceremonies) and general town centre shopping.

**HCS Strong Objection:** The application does not incorporate parking capacity sufficient to address the parking requirement (beyond the boundary of the proposed development) previously served by the Alfred St MSCP demolished to create the current development area. This oversight is inappropriate for a local Authority, focused on the provision of parking facilities to its residents, and contrary to NPPF 93(c).

#### **3.2 Travel Plan:**

The availability of sustainable travel access and justification of parking provision, for the entire KCH, is supported by an aspirational travel plan aimed at 4 key objectives:

1. Encouraging a mode shift to sustainable walking, cycling and public transport
2. Increase staff awareness of enviro and healthy travel
3. Encouraging a reduction in car dependency (particularly 1-person journeys)
4. Reduced operational enviro independence of the site.

### 3.3 HCS comments, drawn from the Travel Plan and supporting assessments:

The transport assessment focuses on staff and visitors travelling by sustainable means from within 5km of the venue. Clearly, those **arriving** in Huddersfield, via train or bus, will also fall within this hinterland. However, based on statistics within the travel assessment, these journeys will account for c15%.

**HCS Comment: By their very nature, such journeys will represent multi-modal transport (which may/may not be timetabled to accommodate late finishes, associate with many of the proposed facilities).**

We note the parking requirement for council staff, working within the public buildings, is to be met via existing council employment-based transport provision.

The travel plan presents a strategy focused on 'hoping' visitors will be encouraged out of their vehicles and onto sustainable transport, yet 'still' predicts that around 80% of visitors to events will arrive by private car. See Table 6: Travel Plan Targets for Staff & Visitors to the Venue and Outdoor Event Space (Page 27 of 'Travel Plan Framework'):

[https://www.kirklees.gov.uk/beta/planning-applications/search-for-planning-applications/filedownload.aspx?application\\_number=2022/93248&file\\_reference=954607](https://www.kirklees.gov.uk/beta/planning-applications/search-for-planning-applications/filedownload.aspx?application_number=2022/93248&file_reference=954607)

The application provides no supporting data around the adequacy of the proposed 350-space car park (never mind the needs previously served by the now demolished MSCP). The simple application of a calculator provides a fair clue. A 2200 indoor event venue, a 3000 outdoor event space, a large food market venue (within the listed Market Hall), separate new buildings accommodating a new Museum (within the former library), a new Art Gallery and a new Library, must clearly generate a need for many more parking spaces if they are to have any chance of being financially viable.

Unfortunately, the travel plan makes no comment on the parking needs of staff/visitors expected to travel by car. With 80% of visitors arriving by car, the financial viability of this £250m project relies upon sufficient, practical provision for motorists. This revolves around the provision of adequate parking, with ease of access and egress, conveniently located.

**HCS Strong Objection: No acceptable evidence has been provided of the likely number of parking spaces required by visitors to the proposed development and surrounding area.**

**The parking provision, proposed within the KCH development, appears wholly inadequate for the level of demand required to serve the facilities within the development. This is contrary to NPPF 107.**

### 3.4 Other factors:

**Defined area of development:** It is notable, that the Town Hall, with its concert hall, and the LB Theatre have been 'left out' of the footprint for the Cultural Heart of Huddersfield. Classical, Orchestral, and Choral music have been important elements of the culture of Huddersfield for >200yrs providing an obvious linkage.

**HCS Comment:** When the parking requirements of the 'entire' cultural attractions are considered, the inadequacy of the proposed parking provision becomes clear.

**Electric Charging Provision:** The current proposals for electric charge points, within the proposed car park, amount to 20% and are welcome. We also understand that the proposal incorporates the principle of converting the car park to 100% electric parking spaces over time. Given the latest standards (PAS1899:2022 Accessible Electric Vehicle Charging), if such a policy were to be adopted, then the size of such spaces would mean that the current 350 spaces would be reduced to approximately 200 spaces. Additionally, the dimensions of parking spaces, used to determine the 350space capacity, is unclear. Many of Huddersfield's current car parks (eg Bus Station) have dimensions too small to accommodate family vehicles.

Clarity is required on the chargepoint strategy adopted for the parking of both cars and commercial vehicles (delivery vehicles and event vehicles). The rating of chargepoints, the assumptions on dwell-times to support both the site and the town centre more generally, should be closely reviewed to ensure they will meet future demand.

**HCS Comment:** Reassurance should be obtained that the site's electrical substation will support 100% EV charging and other commercial EVs with a larger demand. Clearly, as further provision for electric points grows, this would erode the adequacy of planned visitor parking for the various cultural venues.

**Kingsgate Provision:** We understand the Kingsgate car park (650 parking places) may in the future open longer into the evening. However, with the planned opening of a cinema complex, there can be no guarantee of available surplus parking.

### 3.5 Ease of Access & Egress:

The application eliminates both former car park access routes into/out of the site, being under the Ring Rd and the entry/exit on Alfred St. Instead, the proposed access will be via a single entry/exit point directly on to the Ring Rd via a traffic light-controlled junction. The ENTRY caters for traffic travelling in both directions of the ring road. However, the EXIT only caters for traffic leaving by turning left, anti-clockwise on the Ring Rd. This leads to several serious issues detail in the attached appendix.

**3.6 Car Park Flow:** The proposed parking is based on a standard one-way, internal flow through the car park which means:

Anyone entering the car park (to find it full) will have to drive/queue all the way through the car park (and back out), on to the Ring Rd to then face:

- going around the Ring Rd to try again, or
- going round the 'Shorehead' roundabout (through 3 sets of traffic lights) and queuing again, or
- finding alternate parking.

Where the flow of traffic, attempting to leave the car park, becomes restricted (due to the traffic lights on exit – or rush hour traffic on the ring road) traffic queuing to leave the car park will block the flow of vehicles into and through the car park. This will create a knock-on restriction for visitors wanting to enter the car park (from either direction). Once greater than 10 cars are queued, this will start to block 3<sup>rd</sup> party Ring Rd traffic.

The level of frustration built by the above issues will mean visitors (and future performers) will think twice before returning to the event facilities and seriously impact upon the viability of KCH!

**HCS Strong Objection: Operation of the car park via a single entry onto the Ring Rd is unworkable, unsafe and will discourage visitors. The former car park entry/exit under the Ring Rd should not be eliminated. It should be re-introduced as part of the car park solution to provide more practical access during peak times. This mechanism has the advantage of already being a proven solution.**

#### **4. Landscape & Public Realm Strategy:**

##### **4.1 General Design:**

HCS welcome the proposed high quality public realm, in the area currently occupied by the Piazza through to Peel Street and Alfred Street. In particular:

- Significant new trees, shrubs, grass and flower planting of beauty and size appropriate to the site, with specifically named plant species of interest.
- A range of paths from the wide and direct to the narrow and sinuous
- The provision of cycle parking at the perimeter
- Spill-over seating for new venue/catering establishments
- Utility services provided underground to service events in 'The Square'.

**HCS Recommend: The above features are specified within approval conditions which cannot be discharged by provision of 'general' funding. Recent planning experience has demonstrated this rarely delivers the original proposal.**

#### 4.2 Play Provision:

Whilst we are delighted by the introduction of play spaces into Huddersfield town centre, we note that 'play' activities are illustrated only for children.

**HCS Suggest:** The approved scheme could include exercise facilities for adults, as included in parks elsewhere and as covered in previous Kirklees Council health/exercise consultations. We would also recommend exercise and play facilities are concentrated into one side of the public realm, leaving other areas as quieter spaces for rest, relaxation, and socialising (see later).

#### 4.3 Provision for Skateboarding:

The provision of a 'skate wall' alongside a pedestrian route appears ill advised. This type of activity requires a large, segregated area available (for instance in the skatepark at Greenhead Park). The proposed small-scale linear provision, within a busy pedestrian area, is likely to fail to attract many skaters. Where it does, skateboarders will introduce health and safety risks for themselves and seated/mobile pedestrians (including small children, the elderly, and people with disabilities). There will also be the associated noise and risk of graffiti in this area, as often the case in skateboarding areas. How will the wall be protected against graffiti and other damage from skateboards?

**HCS Strong Objection:** This feature should be eliminated from the scheme design.

#### 4.4 Issues associated with Openness:

The area appears to be entirely open plan at present, which conceptually is very attractive. How is this approach reconciled with stated objectives including:

- Creation of a safe environment for younger children (unless all are extremely well supervised by their carer's). Even with a specific area for younger children's play, how will safeguarding be addressed?
- Are dogs to be allowed throughout the area? If not, how will this be clear to the public and achieved? If they are, this is inconsistent with, and inappropriate for, open play areas.
- We understand cyclists are to be excluded from the area. If cyclists are not permitted, then what will be in place to stop them? How will they be expected to move across the Cultural Quarter? How will they access cycle parking when there is none available at the point of entry. This feels exclusive and not in the spirit of the aims and objectives of the KCH.
- Regarding general security concerns in the evenings and at night-time. It is assumed this will be addressed by CCTV monitoring. However, no detail appears to have been provided.

There appears to be no clear proposal about how this space will be used by “all”. Whilst it is commendable ‘to provide’ for all ages, this must also ‘work to suit’ all ages, from safety and noise concerns etc? There also appears to be no clear proposal on how areas for quiet reflection, for children’s play and for other activities will be delineated.

**HCS Recommend: Should this area go ahead as proposed, a planning condition is incorporated requiring provision of an acceptable operational plan detailing how it will be managed (see below) and policed.**

#### **4.5 Future Maintenance:**

HCS see attractive public realm as essential for the success of this development, whether visiting a venue, walking through the town centre or simply enjoying the surroundings. Conversely, failure to construct, and adequately fund the management and maintenance of, this area will lead to intended audiences shunning the venues and undermine the operational businesses.

The level of landscape maintenance across the KCH, requires an order of magnitude far higher than currently applied to existing town centre public spaces (such as the Piazza, St John’s Gardens and St George’s Square). A major contributor to the success of the ‘Hepworth Garden’ in Wakefield, has been the provision of a dedicated professional gardener!

**HCS Recommend: An approval condition, requiring the provision of some form of ‘capital’ funding from the scheme, to underwrite maintenance costs of the Cultural Heart Public Realm (over a period of, say, 25 years).**

#### **4.6 ‘The Square’ Outdoor Events:**

As repeatedly mentioned during consultations, HCS remain concerned that the proposed design does not allow safe operation of pop-up, ticketed events for up to 3,000 people. We are concerned that:

- Temporary barriers, in this location, will be unsightly and impractical for police to prevent attempts at gate crashing and simultaneous safe exit.
- The limited temporary toilet facilities, single access point and queueing system via the gardens are inadequate. The result will be the trashing of the ‘feature’ public realm on a regular basis.
- The recommendations, within the accompanying Arup travel plan (requiring up to 2000 car parking spaces for such an event), cannot be catered for within the parking provided.
- The facility needs to ensure that electricity connections are appropriate for the activities to avoid the requirement for diesel generators. For this to be achieved there will need to be consideration of load capacity requirements and the cost

benefit analysis of noise and pollution of other types of temporary energy generation. These should be incorporated into the square at appropriate access points. To achieve this, some idea of how the site will work is required.

- We have seen no innovative solutions for incorporating waste management facilities into the site and these need to be included (not just bins), including segregated recycling, and segregated waste. How is food hall waste to be managed once it has been removed from the food hall?

**HCS Strong Objection: This proposal should not be approved in its current form. Any approval should be conditional upon a radical reduction in the maximum size of events in this space. A detailed waste management plan is required.**

#### **4.7 Pedestrian Access:**

Whilst we welcome the continuation of both Ramsden Street and Princess Street through the site, we cannot see nearby access routes for those that cannot negotiate the 5m+ new staircase to Queensgate at the end of both routes. During consultations a 24hr lift was proposed at the junction of Queen St and Queens Street South, to provide an alternative to the stairs. This does not appear to feature in current drawings.

**HCS Objection: The absence of a lift at this location, to assist people with disabilities and cycle users unable to negotiate the provided cycle ramps (due to infirmity or other reason) will prevent many from being able to travel directly between the University and the KCH.**

We are particularly concerned that the proposed new staircase, between the food hall and events venue, leads down to a narrow pavement at an intended new pedestrian crossing of the Ring Rd. This short stretch of pavement (sandwiched between the car park entrance/exit and sections of cycleway running at right angles to the intended passenger flow to/from the university) will be dangerous.

**HCS Strong Objection: The proposed multi-modal access introduces a high-level of risk. Serious consideration should be given to a pedestrian bridge, over the Ring Rd, to mitigate the risk of injury, accidents and reduce disruption to traffic. Careful design could create a crossing without introducing additional steps and be a feature of a gateway from university to town centre.**

#### **4.8 Information & Features:**

It is assumed there will be information boards on the facilities and features within the public realm, and on how the area is to be interpreted. Without this, how will visitors appreciate:

- The location of facilities?
- The development reflects the moorland textures, dramatic terrain, and incidental rock formations which FCB have used?
- Any bespoke pieces of art or sculpture to enhance the space and link the Museum and new Art Gallery?

#### **4.9 Provision for Cycles:**

The current level of cycle storage, around the perimeter of the site, is insufficient to accommodate the desired increase in cycle usage. A restriction in availability will lead to cycles being ridden through the public realm and/or locked to trees and infrastructure.

Provision for cyclists, in terms of dry and safe storage, only appears to have been considered a requirement for staff. If Kirklees wish to encourage active travel, appropriate facilities need to provide for cyclists, including but not limited to, weatherproof secure cycle storage (with electric charging facilities), lockers for storing helmets, jackets, bags, etc. and possibly shower facilities for those making KCH a destination from further afield.

**HCS Recommend:** Clear proposals that 'design in' features (eg curves, bumps, changes in surfaces - included in recent urban landscape designs in other towns), to actively dissuade cyclists, e-scooter riders and other non-pedestrians from travelling through the site.

**HCS Strongly Objects:** The provision of secure (ie lockable and enclosed) visitor cycle parking around the perimeter of KCH is woefully inadequate. Why, for example, are secure cycle lockers not being built into the level changes in perimeter walling structures? Such parking ought to be chargeable, and thereby self-financing.

## **Appendix : Car Park Access/Exit Issues:**

**Mass arrivals:** (at the start of events) will mean incoming traffic approaching the car park from 2 directions controlled by separate sets of lights. Such a proposal introduces the risk of:

- Visitor's vehicles travelling clockwise, unable to enter the car park (due to slow vehicles parking), entering the junction and obstructing 3<sup>rd</sup> party traffic travelling anticlockwise on the Ring Rd.
- Non-Visitor vehicles travelling clockwise, may be inhibited from circulating around the ring road due to vehicles crossing lanes to gain access to the car park. This provides a danger of accidents and increasing local pollution.
- Visitor's vehicles waiting to gain entry from the clockwise side of the Ring Rd, queuing back into the flow of 3<sup>rd</sup> party traffic travelling clockwise on the Ring Rd will obstruct the flow. This may also create added restrictions on the already busy Shorehead roundabout.
- Where long visitor queues develop clockwise, visitors may well opt to drive further round the ring road and attempt U-turns either via Outcote Bank or at the junction with Market St triggering further disruption of Ring Rd traffic.
- Visitor's vehicles travelling anticlockwise on the Ring Rd queuing back into 3<sup>rd</sup> party traffic flowing anticlockwise on the Ring Rd triggering disruption to traffic.

**Mass departures:** (at the end of events) will mean ALL outgoing traffic leaving the car park travelling anticlockwise (irrespective of their intended direction of travel). Such a proposal introduces the risk of:

- Car park traffic 'filling' the 2 anticlockwise lanes, blocking the 3<sup>rd</sup> party anticlockwise traffic flow of the Ring Rd (particularly at times of busy traffic levels).
- Vehicles leaving the car park (wishing to travel clockwise) must first travel anticlockwise to the 'Shorehead' roundabout going all the way round (through 3 sets of lights) and then back up the Ring Rd in the clockwise direction. This will significantly snarl Ring Rd traffic flows.
- This same entry/exit point is planned to address the exit of delivery vehicles from the underground service area as well as, pedestrian and cycle routes crossing the entry and exit point. Such a proposal introduces the potential for delays and disagreements where drivers, pedestrians and cyclists become frustrated as vehicles attempt to enter/exit and cross. What considerations of LTN/20 been considered for affective segregation of the different modes of movement?

Based on the above analysis operation of the proposed MSCP will be impractical, obstruct non car park traffic and introduce risks of injury and accidents at the entry/exit point.