

Application number 2025/48/92443/W & 2025/65/92444/W Huddersfield Open Market, Brook Street, Huddersfield, HD1 1DY

I am writing to object to the proposals above.

I am writing to express my own opinions and also to convey the views of more than 140 market traders who have signed a letter objecting to the plans. 140 traders represents the overwhelming majority of traders present at the open market on Thursday 9 October and Saturday 11 October. I can of course produce the signed copy for inspection on request.

I reference the Kirklees Local Plan Strategy and Policies Adopted 27 February 2019 (<https://consult.kirklees.gov.uk/kse/event/34328/section/>) and NPPF to support my objections (<https://www.gov.uk/guidance/national-planning-policy-framework>) along with Kirklees Economic Strategy and Joint Health and Well-being Strategy

1.12 The Local Plan should be read as a whole, with proposals for development being considered against relevant policies depending on the details of the proposal and its location.

My objection is structured in sections with each section supported with reference to the relevant sections of planning documents.

DESIGN

The cornerstone of any responsible design approach to Huddersfield open market must be a recognition that it is one of the most successful parts of Huddersfield town centre by any measure including design; diversity and inclusion; affordability; economic growth and resilience; contribution to the distinctiveness of Huddersfield; architectural significance and in responding to the climate emergency. In a written answer to a question at the Growth and Regeneration Scrutiny Panel, Kirklees Council does not dispute this success.

Traders and customers, drawn from Huddersfield and well beyond Kirklees, testify that it is a unique market in the north of England.

The market in its current configuration huge strength for Huddersfield, and this success means that there is no call for wholesale changes because any change in the character or usage of the market has the potential to irreparably damage the market and the wider town centre.

Such changes are a leap of faith which could easily be the death knell of a much loved building and a driver of the economy of Huddersfield town centre.

The key to the success of the market, now and in the future, is the current configuration of the goods stalls in the main market hall space along with the current number of cooked food stalls that are appropriate to support this current configuration. The 120 goods stalls in their current size and layout allow for the maximum density of stalls and range of goods on offer within the market hall. It is this range that fosters the diversity and popularity of the market, not least on a Saturday, attracting traders and visitors from Huddersfield and well beyond.

Any change in the size, number and characteristics of those 120 stalls puts that success at risk.

The plans submitted in these planning applications reduce the number of goods stalls in the main market hall from 120 to 70, taking up the available space with larger fixed pitch and hot food units, thus reducing the variety of goods on offer. This reduction flies in the face of the needs of the market, in which there is already a waiting list for the existing type of goods stalls.

This is a fundamental change in the character and usage of the building.

The development brief that has driven this change is justified with reference to the Huddersfield Blueprint, with the architects planning statement "the scheme accords with and positively advances the ambitions of the Huddersfield Blueprint". In an answer to a question at the Growth and Regeneration Scrutiny Panel council reiterated that its plans were "part of the Huddersfield Blueprint".

The Huddersfield Blueprint had been devised and was being publicised as early as 2018, and it states that there will be "Open Market refurbishment ...introducing restaurants and cafes and an evening offer".

In their planning statement, Summary of Proposals the architects state that "The development is to support a range of commercial activities including retail, hot food takeaways, bar, restaurant / café uses ..."

However when the Blueprint was devised and published, there were no plans for a food hall in the former Queensgate Market. The current description of the food hall states that "With around ten independent food stalls, the food hall will ... keep the area busy throughout the day and into the late evening." The adjacent outdoor events area will "suit a range of community and cultural events – from food festivals and live music to outdoor cinema and theatre."

We therefore have a remarkable situation in which the architects have been briefed to develop a design for the open market, owned by the council, that puts it in competition with the Our Cultural Heart development, owned by the council.

This part of my objection is supported by the following sections of the Local Plan.

11.1 Design

11.1 High quality design is fundamental to making places more attractive, sustainable, safe and accessible. The way buildings and spaces are designed improves the built and natural environment. Good design can help reduce and mitigate the impacts of climate change; promote healthier lifestyles; create safer places and make high quality and attractive places that foster civic pride and encourage further investment.

11.2 The National Planning Policy Framework (NPPF) places significant emphasis upon design, stating that good design is indivisible from good planning. NPPF requires local authorities to give significant weight to outstanding or innovative designs and should refuse permission for poor design that fails to take opportunity to improve character and quality of an area and how it functions.

11.7

However, the sustainability of a development is a wider concept than just the fabric of the buildings themselves,

Policy LP24 Design

the needs of a range of different users are met, including disabled people, older people and families with small children to create accessible and inclusive places; Good design should be at the core of all proposals in the district and should be considered at the outset of the development process, ensuring that design forms part of pre-application consultation of a proposal.

Development briefs, design codes and masterplans should be used to secure high quality, green, accessible, inclusive and safe design, where applicable.

National Planning Policy Framework

131. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

DIVERSITY

There can be few Grade II* listed buildings anywhere in England that have a more diverse and inclusive range of users than the Huddersfield open market.

In its current configuration it is the most diverse and inclusive part of the town centre, being well used by stall holders and shoppers from all of Huddersfield's different communities. Indeed it is probably the only place in Huddersfield where all communities come together at the same time.

Huddersfield's diversity is one of its greatest strengths, and one of the elements that makes it distinctive.

By changing the design and character of the market the proposals will put that diversity and inclusiveness at risk by configuring the market to target a different demographic of customers including a narrower night time entertainment audience. For example, what affect will the sale and consumption of alcohol during every market day and into the evening have on the inclusive character of the market?

This part of my objection is supported by the following sections of the Local Plan.

Policy LP48

Community facilities and services

Proposals will be supported for development that protects, retains or enhances provision, quality or accessibility of existing community, education, leisure and cultural facilities that meets the needs of all members of the community.

17.2 Sustaining community facilities and services

Proposals which involve the loss of valued community facilities such as shops, public houses and other facilities of value to the local community will only be permitted where it can be demonstrated that:

there is no longer a need for the facility and all options including the scope for alternative community uses have been considered; or

its current use is no longer viable;

Policy LP24

Design

the needs of a range of different users are met, including disabled people, older people and families with small children to create accessible and inclusive places;

Kirklees Health and Wellbeing Strategy Headline Indicators

<https://www.kirklees.gov.uk/beta/health-and-wellbeing-strategy/strategies-and-partnerships.aspx>

Headline indicators

People in Kirklees live in cohesive communities, feel safe and are protected from harm

Adults who say people get on well together

Policy LP13

Town centre uses

All proposals shall be inclusive for all users

9.5 Huddersfield

Policy LP17

Huddersfield Town Centre

Huddersfield Town Centre will be the principal focus for high quality comparison retail goods within the district, supported by a range of leisure, tourism, office (including high quality grade A office space), and other main town centres uses. Huddersfield town centre will also provide high quality educational facilities and opportunities for town centre living.

Proposals for new development within the town centre will be supported where they:

preserve and enhance the towns' cultural and architectural heritage and open spaces, and connections to them;

provide a safe welcoming inclusive destination for people of all ages of the district to visit throughout the day from morning into the evening;

5 Place shaping

5.1 A key role for local authorities is 'place shaping', which includes:

maintaining the cohesiveness of the community;

understanding local needs and preferences and making sure that the right services are provided to local people;

PRESERVATION OF HISTORIC BUILDINGS

A responsible planning application for a such a successful Grade II* listed building as Huddersfield Open Market would be based on identifying and preserving the reasons for its success.

The key to the success of the market, now and in the future, is the current configuration (size, number and characteristics) of the goods stalls in the main market hall space, along with cooked food stalls that are appropriate to support this current configuration.

This configuration means it is a living building, not a museum piece, well used and loved

by stall holders and shoppers from all of Huddersfield's different communities and visitors from well beyond Kirklees.

Any change in the size, number and characteristics of those stalls puts that success at immediate and substantial risk, as does the proposed closure of the building for 18 months.

The current success of the building has emerged over time, which suggests they respond to a real demand, and the well publicised issues with the recently repurposed Derby market show that, in contrast to this real demand, claims made in "vision" documents such as the Huddersfield Blueprint and in planning applications such as this are no guarantee of what will happen in practice.

The open market is next door to a large Tesco supermarket, and there are no fewer than four other supermarkets with 10 minutes walk of the open market. Given this level of competition for food and drink sales, staking the future of this building on food and drink sales is surely not responsible stewardship of such an asset.

This part of my objection is supported by the following sections of the Local Plan.

Policy LP35

Historic environment

Proposals should retain those elements of the historic environment which contribute to the distinct identity of the Kirklees area and ensure they are appropriately conserved, to the extent warranted by their significance,

Development proposals affecting a designated heritage asset (or an archaeological site of national importance) should preserve or enhance the significance of the asset. In cases likely to result in substantial harm or loss, development will only be permitted where it can be demonstrated that the proposals would bring substantial public benefits that clearly outweigh the harm

DISTINCTIVENESS

Traders and visitors to the open market know that it is unique across West Yorkshire and Greater Manchester, it already draws visitors from well beyond Kirklees.

Changes to the current configuration will reduce this distinctiveness and mimic nearby markets in Bradford, Leeds, Barnsley and the like. Why should people travel to Huddersfield, and bring their spending with them, for a market that is no different to the one on their doorstep?

This part of my objection is supported by the following sections of the Local Plan.

3 Issues facing Kirklees

Issue 1 How can the distinctive character of Kirklees be retained?

4.2 Vision

Statement Vision for Kirklees

There will be a focus on regenerating our towns whilst safeguarding and reinforcing those elements which make them distinctive.

The local character and distinctiveness of Kirklees and its places will be retained.

6.5 The Kirklees Economic Strategy and Joint Health and Well-being Strategy place a

focus on regenerating our towns whilst safeguarding and reinforcing those elements which make them distinctive.

ECONOMIC RESILIENCE, GROWTH, AND COST OF LIVING CRISIS

The Kirklees Local Plan prioritises a resilient as well as a growing economy.

In its current configuration the market has demonstrated its resilience beyond any possible doubt, having bounced back from covid without any noticeable investment at all. There is an instructive contrast to be drawn with the Kingsgate shopping centre which required a multi million pound loan from the council.

In its current configuration the market is not only resilient but a driver of the town centre economy, bringing in visitors and spending from outside Kirklees.

One trader with experience across the north of England stated that its current configuration "sets Huddersfield apart from other markets and makes it the best market in the North of England and possibly one of the most important Antique markets outside of the London markets at Portobello Road and Camden. Sellers travel from all over the North of England to stand from Lancashire, Lincolnshire, South Yorkshire, the North East and East Coast. We get buyers coming regularly from as far afield as London and Scotland."

One visitor from outside Kirklees, who tried to comment on the planning application using the online form but was unable to do so because their postcode is outside Kirklees, said the following by email:

"Hello, I was unable to leave a comment on Kirklees Council planning site because my address is in neighbouring Calderdale.

Every week I pick up my family from Hebden Brige and we firstly shop at the open market. We buy at least £10 worth of green grocery (no major or large green grocers for miles), we look at records and CDs and my mum collects ornaments.

We then venture on to the town centre to Kingsgate market and look at the shops at the top of town by primary where the younger ones enjoy CEX and so on.

Here is the thing, we come for the market firstly and then wander into the town for lunch and the other shops.

We will stop coming to Huddersfield if you close the market. That is 6 people weekly with a combined average spend of about £150 to £250 between us all.

Huddersfield market is the heart of the town. I am not related to any trader on your market, this is purely our shopping experience.

We will go elsewhere if the market closes guaranteed."

The flourishing market and its resilience suggest that the way to generate even greater economic growth through the market is to retain its current configuration of goods stalls in the main market hall space along with the current number of cooked food stalls that are appropriate to support this current configuration, then to properly promote the market in Kirklees and outside it to build on its unique place in the north of England and then to prototype a range of activities on closed days without putting its core strengths at risk by changing the current configuration of the main market hall space.

The Kirklees Health and Wellbeing Strategy 2022 to 2027 includes recognition of the effects of the cost of living crisis on health and wellbeing. The second hand tools,

homeware and clothing sold at the market benefit people on low incomes, who may be struggling with the cost of living crisis. It is these stalls that are inevitably most at risk from the proposed change in usage and characteristics of the market in these planning applications.

This part of my objection is supported by the following sections of the Local Plan.

7 Economy

7.4 The following economic policies aim to deliver the overarching objectives of the Leeds City Region and the council's Economic Strategy and Health and Well-being Strategy creating opportunities for economic growth and resilience.

7.1 Employment strategy

7.5 The Local Plan spatial strategy seeks to develop a strong and thriving economy, combining great quality of life and a strong and sustainable economy leading to thriving communities, growing businesses, high prosperity and low inequality and where people enjoy better health throughout their lives. This reflects the Local Plan vision and the main priorities identified in the Leeds City Region (LCR) Strategic Economic Plan (SEP) and the Kirklees Economic Strategy (KES) and Joint Health and Well-being Strategy.

KIRKLEES ECONOMIC STRATEGY 2019-2025

Here in Kirklees we are focused on building local wealth that supports the long term resilience of our economy and communities.

The Kirklees Health and Wellbeing Strategy (KHWS) 2022 to 2027

Some of the most notable, that were not reflected in the previous Strategy, were:

- * the 'cost of living crisis'*
- * recognition of the climate emergency*

POVERTY

Poverty is the most significant factor impacting on the health and wellbeing of people who are experiencing it.

There are many dimensions to poverty including income, food, fuel, credit/debt, financial literacy, digital, housing etc.

✓ We want to ameliorate the impact and stigma around poverty by ensuring all plans consider the impact of poverty

In addition, there is now much wider recognition of the importance of:

- *the impact of poverty and housing on health and wellbeing*
- *tackling inequalities and promoting inclusion*
- *recognising, understanding and working with the distinct communities that make up Kirklees*
- * working with communities and individuals and enabling more people to directly shape their local place, rather than just doing things to or for them*
- * the potential of digital technology for improving health and wellbeing.*

CIRCULAR ECONOMY AND CLIMATE EMERGENCY

Kirklees council declared a climate emergency in 2019.

The second hand homewares and clothing sold at the market have a far lower carbon

footprint than buying new items often manufactured and shipped from abroad, and reusing second hand goods reduces waste.

This aspect of the open market is a selling point to promote the market in its current configuration to an even wider audience (please note that traders and customers are often from outside Huddersfield already). Promotion of the market in this way also contributes to the distinctiveness of Kirklees.

The development brief based on the 2018 Huddersfield Blueprint, and the consequent design proposed in these planning applications, does not recognise in any way this aspect of the value of the open market in its current configuration.

This part of my objection is supported by the following sections of the Local Plan.

Policy LP43

12 Climate change

12.3 These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008, and co-operate to deliver strategic priorities which include climate change.

12.4 The NPPF emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.

3 Issues facing Kirklees

Issue 9 What actions can be taken both to adapt to, and to mitigate climate change?

16 Waste

16.1 As a society, the UK is consuming natural resources at an unsustainable rate. National government considers waste reduction and the use of waste as a resource fundamental to the protection of human health and the environment.

16.4 In the National Planning Policy for Waste central government sets out its commitment to the aims for sustainable waste management which are summarised in the 'waste hierarchy':

16.5 The council strongly supports the guiding principles of the hierarchy

Policy LP43

Waste management hierarchy

16.26 Waste minimisation is at the heart of the national waste agenda and is therefore placed at the top of the waste hierarchy.

The council will encourage and support the minimisation of waste production,

The Kirklees Health and Wellbeing Strategy (KHWS) 2022 to 2027

CLIMATE EMERGENCY

Local partners have declared a climate emergency because we must all take urgent action to

improve and protect our environment.

We will focus on both

Mitigation by dramatically reducing carbon emissions

11.1 High quality design is fundamental to making places more attractive, sustainable,

safe and accessible. The way buildings and spaces are designed improves the built and natural environment. Good design can help reduce and mitigate the impacts of climate change; promote healthier lifestyles; create safer places and make high quality and attractive places that foster civic pride and encourage further investment.

CO-DESIGN

The Community Engagement section of the Planning Statement report that "There were 108 respondents to the online questionnaire".

On Thursday 9th and Saturday 11th October 140 market traders signed a letter objecting to the plans in these planning applications. This represents the overwhelming majority of traders present at the open market on those days, and most of the traders on the market on any and all dates.

Clearly the designs do not take account of the expertise and experience of the market traders themselves.

The design process has included no meaningful co-design with traders, because the brief, contract tendering for the architects and budget were already fixed and designs completed, and so amendments were only an option "where possible" despite the fact that almost every trader considers the plans a bad idea but on their experience and expertise as traders.

This part of my objection is supported by the following sections of the Local Plan.

National Planning Policy Framework

137. Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

138. Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development.

For assessing proposals there is a range of tools including workshops to engage the local community, design advice and review arrangements

WAY FORWARD

Everyone who cares about Huddersfield open market wants the building to receive investment.

The current applications should be refused, on the grounds outlined above, but they can be replaced by a new approach based on a co-design process including the expertise and experience of traders, market visitors, architects and planners.

The preparatory work done by the architects will not be wasted because it has allowed a London-based firm to familiarise themselves with the physical aspects and social context of this unique building.

Saving in costs of materials and construction through the rejection of proposals such as the mezzanine can be repurposed productively to promote economic growth through a marketing campaign across West Yorkshire and Greater Manchester to promote this asset for Huddersfield and attract even more visitors and to prototype ideas for the days when the market is not open.

The integrity of the co-design process and the quality of the resulting designs will be guaranteed by oversight from a steering committee made up of traders, visitors and cross-party councillors, with a brief to commission independent expert advice from civil engineers and architects based in Kirklees as necessary, in accordance with the Kirklees Economic Strategy.

Please keep me updated with all developments regarding these planning applications.

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