

37 Lower Rushton Road
Thornbury
Bradford
BD3 8PU

1st December 2025

Dear Sir/Madam

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

I reference the Kirklees Local Plan Strategy and Policies Adopted 27 February 2019 (https://url.uk.m.mimecastprotect.com/s/VcQtC9OBLtkDJx7uof0CqfWB_?domain=consult.kirklees.gov.uk) and NPPF to support my objections (<https://url.uk.m.mimecastprotect.com/s/ISAcC0OpXtGpn4PsDhNC9naGk?domain=gov.uk>) 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.

DESIGN

I have no objection to improvement to the general locality or the creation of the additional facilities around the existing market, only to the aspects of the design that seek to radically modify the construction, layout and operation of this historic open market.

There is an excellent range of household, vintage and collectible items available from the regular stall holders. Each one has its own specialised range and stock, and items can be purchased at extremely low cost. The numerous traders and the existing layout/design of the market is the reason why it is such a popular draw for Huddersfield residents and out of town visitors. Its traditional design and ambience and its wide range of specialist dealers is unique in the Yorkshire area. The market has a vibrant community and an extremely loyal customer base.

Modernising and diluting the number of open market stalls from 120 to 70 to accommodate food/drink/seating areas will invariably disrupt its operation and

diminish its existing reputation, loyal customer base and ambience. It is also destroying a beautifully preserved and greatly loved piece of market architecture.

The current layout and design is the backbone of its long proven operational success. Some modernising and cosmetic work and improvement to the open market facilities is required but there is no justification for radically modifying the fabric of the market itself.

The public design consultation was sparse. I would therefore argue that insufficient pre-application research was undertaken to determine if there was a need to change the design and operation of what is already a perfectly successful open market.

The Architects have pushed through their plans based on minimal consultation/feedback and on what they believe the local end user wants. Having spoken to many traders and some customers they do believe improvements need to be made but the character and extents of the market need to be retained. No one I have spoken to has wanted more food sellers as there is a proliferation of them all through the centre. All seemed to believe any temporary relocation of the stalls for the duration of the works will diminish attendance and irreparably damage the markets current excellent status and reputation.

In summary there are no compelling reasons or empirically determined grounds for fundamentally changing the layout and fabric of the open market.

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

Market attendees are visiting to buy general and collector/vintage items as well as fruit and vegetables. All the items are offered at a very reasonable cost. They know they are supporting local sellers and are they are loyal in their custom. The diverse demographic of the market is based on how it meets local needs of everyone regardless of their background. There is basically something there for everyone including some affordable food outlets.

Changing or reducing the number of the existing covered stalls will affect the diversity of the people that attend this open market and all in favour of attracting people that like to spend on relatively expensive take-out food and drink. Food outlets in Huddersfield are ubiquitous and already proliferate the town centre and surrounding area.

As a regular market attendee, I frequently observe the same people shopping, meeting and talking to the stall holders and other shoppers. The market has created and fostered its own community, and everyone looks after each other. I myself have made many good friends there. This and this can only be good for the health and wellbeing of all market end users. I do work with vulnerable people as part of my employment so I can see and appreciate the value and benefits of keeping the open market operating as it currently is.

It therefore follows that the proposed plans to change the stall arrangements and range of the existing sellers will destroy the diverse and flourishing community that this market has singlehandedly created and continues to foster. It will also damage the open market's cultural and architectural heritage.

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://url.uk.m.mimecastprotect.com/s/NZdoCg6KQtADvNQh2iPC4AZeW?domain=kirklees.gov.uk>

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

The internal re-modelling, mezzanine and glazing will destroy the character of the open market building and make it into a hybrid construction, neither attractive as a traditional or a modern building. It is a listed building and it is a tourist draw. It needs some cosmetic improvement and not wholesale modernisation to the point its unique construction method, material usage and colours are forever destroyed.

I also note that in Huddersfield Market Redevelopment Planning Statement Document Ref: HMH-GSA-XX-XX-T-1010, no pre-application advice was sought from Huddersfield Civic Society in relation to the history and character of the market. Is there any reason why the London based Architects or Kirklees Council did not

consult an important local group with important local historic knowledge and expertise?

For your information, Huddersfield Civic Society comments can be seen via: <https://huddersfieldcivicsociety.org.uk/news/2025/01/huddersfield-civic-society-reveals-challenges-and-concerns-with-16-5m-plans-for-huddersfield-market-renovation/>

They obviously have the same concerns as the community at large and the end users.

Ultimately, there are more central and easily accessible locations that can be considered for covered food and drink halls so I am not convinced that the perceived public benefits of the proposal outweigh the harm that will be done to the existing open market.

The proposal destroys the character and history of a well-loved and beautiful building and this is not justifiable on any regulatory, commercial or cultural grounds.

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

There are no similar iron construction open markets in nearby towns like Bradford, Leeds, Wakefield and Halifax. I have been attending the market for over 20 years and sometimes twice a week. I attend because it is distinctive and a type of market that is increasingly hard to find. I consider myself lucky that it is only a 30 minute drive away. It is an excellent place to buy high quality vintage and collectable items, often at extremely low prices. Many of my friends also go and consider it unique and an absolute asset for Huddersfield.

Some cities and towns also have large antique and collectors' centres, often based in historic old mill buildings or former factories. Huddersfield does not have any permanent central antiques market so this also evidences the distinctiveness of the existing open market.

I also do not believe sufficient research has been done to prove the existing customer market attendance will convert to the same attendance for the proposal. I would advise Kirklees Council to scrutinise the modernisation and creation of the food hall in Leeds' traditional Kirkgate Market. I have worked in Leeds for 23 years and regularly go through the market there and have observed how its new design has changed the customer demographic in what I would say is in detrimental way. It is no longer an affordable destination for all members of the public. Prosperous office workers and students with high social spending options now seem to frequent the place and it has utterly lost its ambience and traditional affordable roots. The detrimental impact on the long-term traditional traders is also well documented.

Please also note there is no natural footfall through the market area as the central shopping area, train station and bus station are clustered near the centre. Its distinctiveness is its draw.

The adjoining Tesco Supermarket (with free parking) has many customers and they also attend the market (and vice versa). The relationship between these 2 places is almost symbiotic. My routine (observed as being quite common over my decades of visiting) is to park at Tesco, browse the market for interesting things to buy and then pick up some shopping.

The proposed design/layout for the open market will destroy its traditional and historic ambience and will invariably lead to a fall in market attendees. I know I will then have no reason to regularly visit Huddersfield and spend my money there. As such Tesco business will also be detrimentally affected. The proposed changes to the open market design does not account for this simple fact.

In summary, the existing open market is popular and attracts customers from around the region due to its distinctiveness. It is an excellent alternative to online shopping and out of town shopping centres. As such, its distinctiveness is its real strength. It should be promoted and sold as a major authentic tourist draw and not changed to meet modern shopping and eating trends.

Its existence and current method of operation should therefore be safeguarded and reinforced at all costs.

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 current open market has existed for years as an affordable destination for common household items, both pre-owned and sometimes new. The fact it has continued to survive and operate successfully in the face of competition from online markets and out of town centres (as well as general high street retailers) is a testament to its resilience and necessity.

Ensuring the people of Kirklees have affordable shopping options helps tackle existing income and food poverty levels.

Changing the way the existing market is used and reducing the number of second-hand seller stalls therefore goes against the advice of the Local Plan.

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 fact that many perfectly usable items are sold for re-use and saved from the landfill should be recognised and encouraged. The proposal to reduce the number of stalls to allow food and drink establishments will diminish the positive impact the

current market model has from an environmental and recycling point of view. Loss of a regular and loyal customer base will further increase landfill use.

Therefore, by ensuring the existing market stall layout is maintained, Kirklees Council can actively be seen as encouraging and supporting measures to address the climate crisis.

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

In The Community Engagement section of the Planning Statement report, it states that at the end of 2024, engagement with the public was sought to gain feedback on the developing proposals (via a drop-in event). The report also states that there were 108 respondents to a follow-up online questionnaire (that remained open for a one month period).

A one-off small drop-in event and a one-month active online questionnaire to determine the necessity and support for a large tax-payer funded scheme appears inordinately inadequate. The qualitative and quantitative feedback gained is woefully sparse and inadequate for a project of this size and there is absolutely no possibility that any meaningful conclusions indicating public support/opinion can be drawn from the feedback results. In fact the lack of engagement does appear to indicate an overwhelming lack of public desire or interest in this proposed scheme.

Aside from the aforementioned, there appears not to have been any forum(s) or event(s) (public or private) specifically held to discuss and agree the market layout and design in consultation with end users.

On Thursday 9th and Saturday 11th October 2025, a total of 140 market traders signed a letter objecting to the plans in these planning applications. This figure represents the overwhelming majority of traders. This is clear evidence that a majority of the traders do not feel their concerns and needs have been acknowledged and factored into the proposals and that they have had no input in its design.

The livelihoods of traders will also be impacted by these proposals, so sufficient importance and gravitas should have been afforded to determining the needs of the end users and listening to their concerns.

In the interests of transparency, please can Kirklees Council and the Architectural Practice provide any further evidence of how they have carried out early, proactive and effective engagement with all end users (dates/event type/attendance and review arrangements) and prove how their proposals are meeting the existing needs of all end users from a design point of view. Also please provide evidence of the market research and data on how the proposed layout and ratio of trader stalls to food/drink outlets was determined.

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

Please take in consideration the view of all end users of the existing market to ensure that real and demonstrable needs are met and keep me updated.

Thank you.

Kind regards