



Council of plans to build a new town hall on a new site to allow for the expansion of Old Trafford Cricket Club. This department also received correspondence from the friends of Trafford Town Hall ("FOTTH") in October 2006, expressing concern about the future of the building.

## Argument for listing

### The Twentieth Century Society

6. The Twentieth Century Society in a letter dated 24 May 2006, state that the building is under threat' as a result of Trafford Metropolitan Borough Council's plan to relocate. They describe the building as being 'remarkably intact' and regard 'both its exterior and interior' as 'coherent and original'. Original features include 'the Council Chamber, the central staircase with stained glass windows and bronze statues, and corridors with original door furniture and tiled floors'.
7. The Society point out that a number of commercial and municipal buildings designed by the architects Bradshaw, Gass and Hope have been listed at Grade II, including: Burnley Town Hall; Luton Town Hall; Winbledon Town Hall; and Methodist Central Hall in Manchester. They consider Trafford Town Hall to be 'a good and well preserved example of the firm's municipal work and is architecturally as success as, for example, the listed Burnley Town Hall. We believe the building ought to be added to the list for its architectural merit'.
8. A copy of the Twentieth-Century Society advice is attached at **annex C**.

<sup>40</sup>  
[redacted]

9. In a letter dated 25th May 2006, <sup>40</sup> [redacted] <sub>40</sub> [redacted], applied for the building to be spot-listed after seeing a press release by Trafford Metropolitan Borough concerning plans to relocate the Town Hall. The letter refers to the building's 'architectural merit, its historical significance and its importance as a symbol of local government in the Manchester area.'
10. <sup>40</sup> [redacted] describe the building as a reminder of the 'golden era of municipal government, when many towns received municipal borough status and built imposing town halls as a way of proclaiming local prestige, wealth and success'.
11. A copy of <sup>40</sup> [redacted] letter is attached at **annex D**.

<sup>40</sup>  
[redacted]

12. In a letter dated 1 June 2006, <sup>40</sup> [redacted] in light of press reports concerning plans to redevelop the site, requested that the Town Hall be listed. He

considers the building as being 'worthy of preservation'. He states that the exterior 'has not been altered since its erection' and that the surrounding gardens 'have remained as they were first designed'. He refers to there being 'photographic evidence to this effect'. He mentions that 'the interior remains much as it always has been with exceptional period details including doors, fireplace, and tiling.'

13. A copy of <sup>40</sup> letter is attached at **annex E**.

<sup>40</sup>

14. In letters dated 1 June 2006, <sup>40</sup> and <sup>40</sup> both express support for the listing application made by the Twentieth Century Society.

15. <sup>40</sup> describes the building as a 'beautiful three storey typically 30s building. The interior is remarkably intact retaining its original features including the original Council Chamber, entrance hall and staircase as well as doors, tiles and fireplaces.' <sup>40</sup> considers the Town Hall to be 'a beautiful building of considerable architectural merit' and is of the view that 'if it were to be demolished, the Borough would be poorer for it'.

16. <sup>40</sup> describes the Town Hall as 'an imposing building', and refers to it having retained 'original features such as doors, fireplaces, and windows'. He states that 'the Council Chamber and the Mayor's Parlour in particular are worthy of listing'.

17. A copy of the letter from <sup>40</sup> is attached at **annex F** and a copy of the letter from <sup>40</sup> is attached at **annex G**.

#### Friends of Trafford Town Hall

18. The Friends of Trafford Town Hall (FOTTH) are campaigning to save the building, in a round-robin letter dated 25 September 2006, <sup>40</sup> Chair of FOTTH, writes expressing concern that the Town Hall a 'landmark building is going to be denied Grade II listed status'. He describes the building as 'one of the few architecturally significant buildings in Stretford' and as 'a local landmark, and one that is familiar to national and international visitors'. He points out that the building has been 'consistently hailed in Trafford Metropolitan Borough Council's website for its fine interior and exterior features'.

19. <sup>40</sup> is concerned that 'the commercial interests of Lancashire County Cricket Club' and 'the desire by TMBC to move to new premises and vacate the current site in favour of the redevelopment of the cricket ground' will have a bearing on the listing decision.

20. A copy of <sup>40</sup> letter, and the FOTTH campaign leaflet, is attached at **annex H**.

RT Hon Beverley Hughes MP

21. Beverley Hughes has received a copy of ~~40~~ round-robin letter of 25 September, sent on behalf of the FOTTH, and has been contacted by other constituents concerning the listing application for Trafford Town Hall. She supports the view that the building is 'one of the few architecturally significant buildings in Stretford and is a local landmark enjoyed by many local residents and visitors alike'.
22. Ms Hughes has also forwarded a copy of a letter from the Chief Planning Officer at Trafford Metropolitan Borough Council to EH which states that 'awarding listed building status to the Town Hall building and site would introduce a significant obstacle in the contribution it could potentially play to combining sites to facilitate the improvement and redevelopment of the cricket ground.
23. She asks that the strong feeling felt by local residents in support of listing is taken into account in reaching a decision.
24. A copy of Beverley Hughes' letter is attached at **annex I**.

English Heritage

25. In advice dated 18 July 2006, English Heritage commented that the building is a very good example of inter-war architecture, exhibiting many of the distinctive features of the period style. It is a blend of Neo-classical and Art Deco, creating a strong civic statement of modernity within a classical framework.
26. The external appearance to the side and rear is compromised by the 1983 extension, but EH emphasise that this 'has impinged very little upon the fabric of the original building'. Much of the original interior remains. EH's advice refers to the interior in the following terms: 'very little has been altered from the original plan, and a wealth of decorative features survive intact. Many of these, link the interior and the exterior, especially in the wrought iron work and the circle and sunburst motifs executed in stone all original'. They go on to describe both the council chamber and committee rooms as 'impressive examples, again with their original features intact'.
27. EH state that there are 'clear points of comparison between Trafford Town Hall and other Bradshaw Gass and Hope listed buildings'. For example, Wimbledon Town Hall has a similar stripped classical exterior and Luton Town Hall which 'is in the same style and with a clock tower of similar proportions'.
28. The EH advice concludes that the building has special architectural interest 'on account of its exterior; its planning and internal decoration; its intactness, and the quality of its sculptural embellishment'; and historic interest 'as an example of interwar municipal architecture' and 'of local municipal pride'.

They do point out, however, that 'the special interest is concentrated on the principal elevations and main public rooms'.

29. In their original report of 18 July 2006, EH stated that as the later addition to the rear is not of interest it "does not form part of the listing". Whilst it is possible for only part of a building to be listed, this is unusual and **in any event** section 1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990 operates so that any object or structure fixed to a listing building shall be treated as part of the listed building. Unless the unlisted part of a building has an entirely separate use from the main building (which is not the case with Trafford Town Hall's modern extension) and cannot therefore be considered to be ancillary to it, section 1(5) will operate to include it within the listing. In view of this, we asked EH to clarify the basis on which they considered that the later addition was not part of the listing. In response, EH has amended its original report to remove the reference to the modern addition not being part of the listing, although they make clear that it is not, in itself, of any special interest. This will assist the Local Planning Authority in determining where the special interest of the building lies when dealing with Listed Building Consent applications.

30. A copy of EH advice is attached at **annex A**.

#### **Arguments against listing.**

##### Trafford Metropolitan Borough Council

31. In a letter dated 7 July 2006, Simon Castle, the Chief Planning Officer from Trafford Borough Council acknowledges that Gerry Shaw, the Council's Conservation Officer, considers the building to be 'a sound if somewhat conservative example of a municipal building of the period', and that the rear of the building 'has been somewhat concealed and compromised by the modern extension'. Mr Castle concedes that the Town Hall 'could be considered to be a landmark building in an area now devoid of period properties and largely typified by unremarkable architecture'.

32. Simon Castle believes that Trafford's cricketing heritage would be threatened by the proposal to list the building. HE points out that 'Lancashire County Cricket Club has been based at the ground and continuously played cricket here since 1856 and the central pavilion has survived from much of this period' He makes reference to an EH publication called *Played in Manchester: The architectural heritage of the city at play* which recognised the history and the development of sporting activity in the Trafford Park/Old Trafford area. Trafford Metropolitan Borough Council is anxious to prevent the loss of the expansion of facilities at the current ground mean that if Trafford Town Hall is listed, options for redevelopment might be critically restricted, and mean that the LCCC, will look elsewhere. The Council consider the sporting heritage of Trafford to be the greater concern.

33. A copy of Simon Castle's letter is flagged at **annex J**.

Lancashire County Cricket Club (LCCC).

34. In an initial letter dated 25 August 2006, ~~40~~ of Drivers Jonas acting on behalf of their client Lancashire County Cricket Club (LCCC), explains that the LCCC have been in dialogue with Trafford Borough Council regarding the possible use of Council owned property including the Town Hall as part of a comprehensive regeneration project to secure the future of cricket at Old Trafford.
35. A further letter from Drivers Jonas, dated 11 October 2006, covered an historic building appraisal by Stephen Levrant Heritage Architecture Ltd who were commissioned by Drivers Jonas to assess the Town Hall's historical and architectural significance and its suitability for listing. The report acknowledges that the building 'retains many Art Deco and Adamesque features'. However, it goes on to argue that alterations to the Town Hall have 'adversely affected the building's plan form and rear elevation'; that the building's setting is compromised 'as the area is characterised by patchwork planning with many 1960s office blocks'; that it 'does not illustrate any important aspects of the nation's history and is not associated with any nationally important people or events'; that 'it does not form part of any group of buildings nor is it a fine example of planning'; that it 'does not display technological innovation of virtuosity'. The authors of the report conclude that 'in spite of its architectural interest, the special interest of Trafford Town Hall is not elevated to that of being a 'national importance'.
36. Drivers Jonas accept the findings of the report and further argue that EH's assessment 'is based solely on its architectural significance and therefore, fails to address all of the criteria which PPG15 requires be assessed in such circumstances'.
37. A copy of the letter from Drivers Jonas dated 25 August is attached at **annex K**, and a copy of the letter of 11 October and the appraisal by Stephen Levrant Heritage Architecture Ltd is attached at **annex L**.
38. In a letter dated 27 October 2006, Sir Dennis Landau, President of Lancashire County Cricket Club refers to a copy of a letter sent on behalf of LCCC by Drivers Jonas to Yvette Cooper MP, the Minister for Housing and Planning, which raises two issues 'the outcome of which the Club considers will materially impact on its ability to secure its long term future at Old Trafford Cricket Ground'. The two issues referred to are the Trafford Town Hall listing application and a planning appeal.
39. A copy of the letter from Sir Dennis Landau is attached at **annex M**.

Sports Division / Sport England

40. In an email dated 27 July 2006, colleagues in Sports Division point out that the ward in which Trafford Town Hall is located falls within an area of the highest level of deprivation. The plans being developed by the local authority and

LCCC to regenerate the area around Old Trafford Cricket Club would ensure that the current sporting provision is modernised and able to continue generating much needed revenue for the local economy.

41. Reference is made to the listing of Crystal Palace Sports Centre which saw the creation of a real conflict between ensuring that an ageing sports facility can be maintained as 'properly fit for purpose', while ensuring that a listed heritage site can be protected.
42. Sport Division have reported the views from Sport England North West who have expressed concern that listing may have a detrimental impact on sport and the economy of the area, should LCCC decide to relocate because it cannot carry out its plans for redevelopment. We have sought Sport England directly for further comments on Trafford Town Hall, but they did not respond.
43. A copy of email from Sports Division is attached at **annex N**.

#### Conclusion

44. The main arguments against listing made by Drivers Jonas on behalf of LCCC are that Trafford Town Hall is not of 'national importance' and that the EH assessment is based solely on architectural significance and fails to address all of the criteria for listing.
45. In further advice dated 17 October 2006, annex O, EH provided a response to the arguments made by Drivers Jonas in their letter and heritage assessment. With regard to the point made about the failure to address all the criteria for listing, the advice explains that there is no requirement within PPG15 that all the criteria have to be met in order for a building to be considered listable. they state ' in this instance, the assessment makes clear that the building is considered to be of special architectural interest, as expressed in its exterior, interior spatial planning and decoration and the quality of its sculptural embellishment, and of special historic interest as an example of government assisted municipal architecture of the inter-War period'.
46. EH are of the view that the conclusions reached in the heritage assessment report challenge their advice 'without providing any substantive evidence to support what is essentially a difference of opinion'. EH address two specific points made in the conclusions to the heritage assessment. In response to the first, that alterations made to the Town Hall have ; adversely affected the building's plan form and rear elevation', EH point out that 'the addition to the rear of the building is explicitly identified as not being of special interest'. In response to the second, that the building's setting is compromised, EH point out that 'no claims are made in the EH assessment concerning the content and quality of the building's setting'.
47. The remaining objection to listing made by both Trafford Metropolitan Borough Council and LCCC revolves around the expansion of sporting facilities in Trafford, which is not relevant to the question of whether Trafford Town itself fits the criteria for listing. When assessing buildings for listing we can

only judge by the criteria of architectural and historical merit, as set out in PPG15. This building is a fine example of inter-war municipal architecture by well-respected architects. It has a high level of architectural and decorative quality and intactness, and thus clearly fits the criteria for listing. The fact that a building is listed does not necessarily mean that it must be preserved for all time; the main purpose of listing is to ensure that care will be taken over any decision affecting its future, that any alterations respect the particular character and interest of the building, and that the case for its preservation is taken fully into account in considering the merits of any redevelopment proposals.

48. We concur with EH's advice, and with their views on the objections raised, and recommend that you list Trafford Town Hall at Grade II.

#### Presentation / Media

49. If you agree that this building should be listed; we will send the draft decision letter at flag C to the applicants. Once the applicants have been notified, we will prepare draft letters for you to send to the local MPs: Graham Brady, Beverley Hughes, Paul Groggins and Sir Gerald Kaufman; and to Sir Dennis Landau. We propose that other interested parties should be notified in accordance with the usual listing procedures.
50. Although there is potential for controversy, we do not consider a press notice to be appropriate. However, given the interest of the local media in the future of Trafford Town Hall, we will ensure that DCMS Press Officers are fully briefed.

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DRAFT DECISION LETTERS FROM DCMS OFFICIALS TO APPLICANTS

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[Redacted]

The Twentieth Century Society  
70 Cowcross Street  
London EC1M 6EJ  
Letter received 24 May 2006

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[Redacted]

Letter received 25 May 2006

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[Redacted]

Letter received 1 June 2006

**PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990  
BUILDINGS OF SPECIAL ARCHITECTURAL OR HISTORIC INTEREST  
TRAFFORD TOWN HALL, TALBOT ROAD, TRAFFORD, GREATER MANCHESTER**

I refer to your letter of 24 May 2006 asking the Secretary of State to list the above building.

After careful consideration of all the evidence, including advice from English Heritage, the Secretary of State has decided to list Trafford Town Hall. The building has been added to the list today at Grade II having been judged to be a building of special architectural or historic interest.

In arriving at her decision the Secretary of State took particular notice of the following factors. A monumental neo-classical public building, that possesses special architectural interest on account of its exterior; its planning and internal decoration; its intactness, and the quality of its sculptural embellishment. It is also of historic interest as a fine example of inter-war municipal architecture and of local municipal pride.

I enclose a copy of the list entry and of the advice from English Heritage for your information.

If you consider that the decision has been wrongly made, you may write to the Department for Culture, Media and Sport within 28 days of the date of this letter to request that the Secretary of State review the decision. An example of decision made wrongly would be where there was a factual error or an irregularity in the process

which affected the outcome. You may also ask the Secretary of State to review the decision if you have any significant evidence relating to the special architectural or historic interest of the building which was not previously considered.

Further details of the review criteria and process are contained in the annex to this letter.

#### Annex: Review Criteria and Process

A review will only be carried out in the following circumstances:

(1) there is evidence that the original decision has been made wrongly. Examples would include:

- where there was a factual error, e.g. the wrong building was listed; or
- where there has been some irregularity in the process which has affected the outcome, e.g. relevant considerations were not taken into account or irrelevant considerations were taken into account.

(1) there is significant evidence which was not previously considered, relating to the special architectural or historic interest of the building, as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. An example would be where new evidence relating to the date of a building has been discovered which might make a material difference to the architectural or historic interest of the building.

Having conducted a review, the Secretary of State will either affirm or overturn the original decision. It is important to understand that the original decision will stand until the Secretary of State has made a decision on whether the original decision should be affirmed or overturned. If the original decision is overturned, this will not have retrospective effect.

Review requests which are received after 28 days from the date of this letter may be considered in exceptional circumstances.

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Note: Below are copies of letters attached at annex J and annex L, which do not form part of the listing decision. They are under the Background Note.