

# Comments on Public Consultation

Pier Pavilion Site, Llandudno

**DCFW Ref: N111**

Comments on material for public  
consultation October/November 2016



## Consultations to Date

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Discussions between the developer, the local planning authority and Cadw are ongoing. The project has been publicised in local and national press and is currently undergoing a period of public consultation.

The Design Commission for Wales reviewed this scheme at a Design Review on 30th June 2016, and these comments should be read alongside our report from that review which can be found online: <http://cdn.dcfw.org.uk/111-Pier-Pavilion-Site-Llandudno-DR-Report-June-16.pdf>

## The Proposals

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The site of the former Pier Pavilion is in a prominent location at the west end of Llandudno promenade and the land end of the pier with the Great Orme behind it. The site is bounded to the south west by a single storey arcade, to the north by a road which runs up the Great Orme and to the north east by the listed Grand Hotel. Existing access to the site, which drops down below the level of the adjacent road and pier, is from a gate at the west end of the site.

The site is listed, although the previous pavilion building burned down in 1994. The only notable feature of the pavilion structure to remain is a row of columns along the edge of the pier. An application for a hotel on the site was refused in 2013.

A mixed use scheme over eight levels is proposed, comprising basement parking, commercial (kiosks and restaurants) and apartments.

## Comments

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### **Overall approach**

The Design Commission welcomes the developer's ambition and vision for this project, especially the desire to reuse and regenerate this derelict site in an important and prominent location in Llandudno, and to provide quality seaside living. The proposed mix of uses and overall massing seem appropriate given the need to achieve commercial viability in order to bring the site back into use. With a good design process, including thorough and informative analysis and testing, meeting the developer's ambitions and delivering an excellent standard of quality should be achievable and add value to this important seaside town.

The site provides an excellent opportunity for quality development in Wales. Its outstanding location and heritage demand the very best in design quality which captures and maximises the value of the site. The developer has expressed responsibility for and commitment to achieving quality, whilst tackling the challenge of delivering a viable and regenerative building. However, the proposals presented for public consultation still do not achieve the design excellence demanded by the site and setting.

The Commission's report from the June 2016 Design Review highlighted significant problems in the proposals and design process which were falling short of both the

developer's ambition and the quality demanded by the site. Whilst stating that the comments from that report have been addressed, the proposals now being presented for public consultation, regrettably still fail to deliver the ambition and make the most of this opportunity.

The focus on building appearance in isolation from strategic design in the design development since the review has not been useful.

### **Project vision**

A project vision is stated in the public consultation materials, but it is not concise. From the material, it is not possible to understand the reason for the vision and how it has been informed by analysis of the site, context and market and consideration of future residents and visitors.

### **Simplify for quality**

Although the proposal has been simplified visually, and in form to a certain extent since the previous review, it remains very complex.

The internal arrangement of the apartments and circulation would benefit from significant further simplification. The inclusion of angled and curved dividing walls and curved bridges adds complexity, and therefore cost, without adding value or quality.

Complexity increases the cost of delivery, so simplifying the design allows more to be invested in better quality materials. Good quality finishes and durable materials, particularly for this site, can deliver better long term value through reduced maintenance and replacement.

### **Maintenance and Durability**

Due to the seafront location, the long term maintenance and durability of the materials used in the facades and on balconies will be very important. If the materials, junctions and details are not considered now, the building could suffer from staining, corrosion and prohibitively high maintenance costs.

The salty air and exposed location mean that materials and fixings need to be chosen carefully in order for quality to be maintained in the long term. Drainage from balconies should be carefully designed to avoid unsightly staining, and any rainwater goods should be included on elevation drawings. Large areas of glazing, including glazed balconies will require regular cleaning to remove salt stains.

### **Evidence gathering, site analysis and response**

Although some basic site analysis and context history are shown, it is not clear how these have informed the design.

Given the important location within a conservation area and in proximity to significant listed buildings, we would expect to see more detailed studies of the context, including section and elevation drawings to explain the surrounding buildings and topography and how the proposal works as a composition with the arc of existing seafront development. The drawings presented for public consultation, and those in earlier design stages show the proposal in isolation, making it difficult to see how a response to context has been fully considered.

## **Key viewpoints**

The photo montages of key viewpoints are useful but limited. It would be helpful to show the proposal in agreed views from the pier and various approaches by road and footpath.

As highlighted in the public consultation material, the view of the roof from the Great Orme is important. It would be helpful to understand how the roofscape will work in more detail, as the complexity of forms, materials, plant, vents and PV panels appears cluttered. There is no indication of how safe access for maintenance or rainwater will be dealt with. If these issues are not considered and designed in at this stage, it could lead to the addition of further clutter and significant changes to the roof design (and elevations) at a later date.

## **Strategies and design progression**

The majority of the design progression presented in the document C326\_A\_G\_2016-10-28\_Planning-Presentation-v4-0 has been focussed on the appearance of the building, rather than at a strategic level. Different elevation compositions and facade materials have been explored by the architects and through dialogue with the local planning authority focussed on what it looks like.

It is important that the developer and planning authority understand that good design is about much more than cosmetic appearance. The Commission would like to see facades designed through close consideration of building strategies, especially the environmental strategy. The facade will play a significant role in controlling energy use, solar gains/overheating, ventilation and overall levels of comfort for occupants. We would expect to see thorough testing of solar access and thermal modelling throughout the design process, and the facade designs changed in response.

Focussing only on the building's appearance makes it very difficult to achieve objective assessment and responses. This is likely to present problems during the public consultation, as members of the public will not understand how the building functions and performs, but can only comment on appearance.

As at the Design Review in June 2016, the proposed scheme still appears to be missing important strategic-level rationale. This means that it is difficult to justify the proposal. It would benefit the scheme to consider the following issues strategically:

- Access, movement and way-finding
- Servicing (deliveries, refuse collection, maintenance)
- Environmental design (including energy)
- Structural design
- Approach to heritage and conservation
- Public realm enhancement

## **Integrated design and environmental strategy**

It is disappointing that we cannot see an integrated approach to environmental design, structure and landscape design.

We reiterate that it is important not to think about the external appearance of the building in isolation from the inside, as the form and facade design will significantly

affect the quality and conditions of the interior spaces. Environmental design and the spatial planning of the building will have an impact on how people use spaces and how comfortable they feel.

It is especially important to integrate sustainability and environmental strategies, as these cannot be successfully 'bolted on' at a later stage. Although many issues relating to energy and sustainability will not be assessed until the Building Regulations application stage, it is essential that they are well considered at the pre-planning stage as they have an impact on form, layout, materials and elevation design. Low-energy and running costs would be selling points for the building if they are built in cost effectively from the early design stages. Adding sustainable 'features' later in the process is likely to be costly and increase the complexity of operating and maintaining the building.

It is disappointing to see such low scores under the energy categories in the CSH and BREEAM pre-assessment predictions. This highlights the lack of integration of a sound energy strategy in the design process thus far.

We reiterate that avoiding overheating of the east, west and south-facing units will be crucial to avoiding uncomfortable conditions for residents and visitors to the commercial units without the need for energy-intensive and costly air-conditioning. The north facing units will have very different conditions to deal with. Daylighting and glare must also be considered. It is critical that environmental analysis, including thermal modelling, informs the design. Therefore, modelling must be undertaken and repeated from an early stage, and well before a planning application is prepared, as it should have a significant effect on the appearance of the building. There is no evidence that this has taken place in the design process to date.

The current proposals show apartment rooms, including bedrooms, with their only windows facing into the shared atrium. Careful consideration must be given to whether this achieves adequate levels of daylight, ventilation and privacy. Accurate environmental modelling and testing is required. Daylight levels will diminish significantly at the lower levels of accommodation, especially where there is a walkway above the window. The ventilation strategy for these rooms must be shown to work with the fire strategy.

In order to create an energy efficient building envelope, the potential for thermal bridging at the balconies and terraces must be carefully considered and designed out. The proposals presented at the review and for public consultation indicate largely glazed facades which could be more costly to insulate to a high standard than non-glazed walls, and should be given further thought. The Welsh Government's publication, *Practice Guidance: Planning for sustainable building*, provides useful guidance on integrating sustainability in the design and planning process.

<http://gov.wales/topics/planning/policy/guidanceandleaflets/practice-guidance-planning-for-sustainable-buildings/?lang=en>

The proposals require revisiting at a strategic level in order for sustainability and environmental design to be properly integrated. This scheme is of such importance that it deserves more time to get this right before a planning application is made. This observation was made in June 2016.

## **Building services & structure**

It is not clear how the mechanical services to and from the apartments will be dealt with.

The plans do not show service risers to each apartment, so it is not possible to understand how extract flues and waste water/sewerage drainage will be dealt with. To achieve efficiency in this respect, we would expect to see kitchens, bathrooms and utility rooms clustered as far as possible. This would minimise the number of service risers required.

Of particular concern is the lack of indication of how waste water drainage from apartments will be dealt with at the lower levels. Retrofitting the design with numerous down pipes puncturing the restaurant space would not be acceptable.

It is important that building services form an integrated part of the design at pre-application stage, as late addition of flues, vents, service risers or horizontal service zones would significantly alter the appearance and function of the building.

It is also important that the primary structure of the building is resolved at this stage. If floor slabs or beams need to increase in size (for example, a transfer structure may be needed between the residential and commercial floors) the overall height of the building would increase. Services and structure must be fully integrated.

## **Movement and public realm**

There is potential for this scheme to make a significant positive impact on Llandudno. To maximise the benefits of the scheme, it would be good practice for the design team to consider integration with the public realm surrounding the site, even if it falls outside of the technical 'red-line' boundary. We would like to see suggestions for public realm improvements developed through discussion with the local authority's planning and highways teams.

It is disappointing that bin stores are located at ground floor level almost all the way along the Happy Valley Road elevation. We would like to see other waste strategies considered and rigorously tested. However, if this is found to be the best solution, careful detailing and specification of access doors will be needed to minimise negative impacts on passersby, including smells and appearance. A management strategy for these areas should also be considered.

## **Further review**

The Design Commission welcomes the opportunity to review significant schemes a number of times as design work progresses. Given the high quality of design demanded by the ambition for this exceptional site and the considerable distance the scheme is from achieving this, we strongly suggest that sufficient time be afforded the design team and that a further review takes place following this period of public consultation and prior to a planning application being made. The Commission reiterates that proper investment in a proficient, thorough, integrated design process is crucial to achieving good value and quality.

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