

**Board Report**

File #: 2017-0476, **File Type:** Agreement**Agenda Number:** 1.

**REVISED
EXECUTIVE MANAGEMENT COMMITTEE
NOVEMBER 16, 2017**

**SUBJECT: EXPO/CRENSHAW STATION JOINT
DEVELOPMENT PROJECT****ACTION: AUTHORIZE EXECUTION OF SHORT TERM EXCLUSIVE NEGOTIATION
AGREEMENT AND PLANNING DOCUMENT****RECOMMENDATION**

AUTHORIZE the Chief Executive Officer to execute a two phase, six-month Short Term Exclusive Negotiation Agreement and Planning Document (Short Term ENA) with Watt Companies, doing business as WIP-A, LLC (Developer) and the County of Los Angeles (County) for the development of 1.77 acres of Metro-owned property and 1.66 acres of County-owned property at the Expo/Crenshaw Station (Site), subject to resolution of protest(s), if any.

ISSUE

In January 2017, Metro and the County released a Request for Proposals (RFP) for joint development of Metro and County-owned parcels at the Expo/Crenshaw Station (see Attachment A - Site Map). On April 20, 2017, Metro and the County received four proposals (see Attachment B - Procurement Summary), and following evaluations, staff recommends entering into a Short Term ENA with Watt Companies, the highest scoring firm. The Short Term ENA will provide an interim period before executing a full term ENA during which community outreach can occur and the project can be further defined based upon community input. In addition, the Developer will be required in the initial three months to identify and enter into a letter of intent with a community-based organization for its participation in the development of the project, including the opportunity for an economic interest in furtherance of the goals of Metro's Joint Development Policy and the Expo/Crenshaw RFP and Development Guidelines (Development Guidelines).

DISCUSSION***Background***

On March 26, 2015, the Metro Board of Directors (Board) directed staff to develop a strategic plan for joint development activities along the Crenshaw/LAX Transit Corridor and to work with public sector partners to implement joint development activities on publicly-owned land along the corridor. Completed in June 2015, the Crenshaw/LAX Transit Corridor Joint Development Strategic Plan

identified Metro and County-owned properties at the Expo/Crenshaw Station as a joint development opportunity site which was then included in Metro's Transit Oriented Communities (TOC) Demonstration Program.

Also per Board direction, Metro entered into a Memorandum of Understanding (MOU) with the County, acting through the Community Development Commission of the County of Los Angeles (CDC), to administer the joint development process leading to an integrated project across both the Metro and County properties at Expo/Crenshaw Station. Following extensive community input, Development Guidelines were adopted by the Board in June 2016 and integrated into the RFP.

Expo/Crenshaw Station Opportunity Site

The Site incorporates two properties in the City of Los Angeles: (1) a County Probation Department facility located at 3606 W. Exposition Boulevard (southwest corner of Exposition and Crenshaw Boulevards) which the County plans to vacate to repurpose for transit-oriented development; and (2) a Metro-owned property on the southeast corner of Exposition and Crenshaw Boulevards that currently serves as construction staging for the Crenshaw/LAX Transit Project. Located at the intersection of the Expo Line and the future Crenshaw/LAX Line, the Site has superior regional connectivity to employment and activity centers including Santa Monica, Culver City, USC, Downtown LA and Los Angeles International Airport. The community-driven Development Guidelines for the Site identify the opportunity for a culturally distinct gateway destination and pedestrian-scaled community serving residents and visitors with high quality and local-serving retail uses and a range of housing types, both market rate and affordable. It also identifies opportunities to foster job growth with attractive retail and/or business incubator space, among other goals.

Developer Proposal

The recommended firm's proposal was submitted by WIP-A, LLC, a wholly-owned subsidiary of Watt Companies, a Southern California-based owner/manager/developer with over 70 years of experience. The proposed team includes additional firms exceptionally accomplished in architecture, engineering, urban design, and community engagement. Team members have worked together in smaller combinations on several projects and bring a number of best practices from other notable transit-oriented development projects throughout Southern California.

The Developer's proposal articulates a project vision that fundamentally follows the objectives highlighted in previous community workshops and identified in the Development Guidelines. The proposal contemplates a total of 492 residential units dispersed over both sites, with 73 (15%) of those units restricted to households earning 50% or less of area median income (AMI). Approximately 47,500 square feet of commercial and retail space is envisioned with a grocery store and locally-owned and operated restaurants identified as potential tenants. In accordance with the Development Guidelines, the proposal includes specific strategies for achieving a variety of shared community, County and Metro goals for the Site, including a business incubator-type space aimed at generating economic development benefits and opportunities. Proposed public amenities include a multi-mobility hub with bike and car-share connections to increase transit ridership and support active transportation. The proposal effectively envisions activating public space around the Site by utilizing street vacations to create public plazas leading to ground floor community meeting spaces, and preserves the opportunity for an additional station entrance on the County property to facilitate safe connections between the Crenshaw/LAX and Expo Lines. The proposal has the potential to create an

architecturally iconic gateway and vibrant transit hub to be enjoyed by both existing and future residents and visitors (see Attachment C - Site Plan and Renderings). The Developer's commitment to a robust stakeholder engagement process further aligns with community priorities expressed in the Development Guidelines.

The Metro Joint Development Policy has a number of objectives and goals, one of which is fiscal responsibility. Joint development projects are expected to generate value to Metro, and by extension to the County, based on maximizing ground rent revenues received for use of publicly-owned property. In addition to substantial ground lease rental payments to both Metro and the County, the Developer's proposal also includes a "look-back" provision that would provide a one-time payment to both property owners if the project proves to be more profitable than projected. The Developer also offers both Metro and the County a portion of proceeds derived from the sale or refinancing of the developer ground lease interest and site improvements. The overall proposed financial terms contemplated in the proposal are highly competitive and align with Joint Development Policy goals.

Short Term ENA

Typically, following the proposal solicitation process, a developer is selected to enter into an ENA with Metro for a base term of 18 months during which project refinement and entitlements occur and ground lease transaction terms are negotiated. After careful consideration, staff recommends a two phase, six-month Short Term ENA as an interim step to allow the parties the ability to directly communicate about project scope and team composition, and to have an open dialogue with community stakeholders before committing to a long term ENA. Within the first three months of the Short Term ENA, the Developer will be required to identify and enter into a letter of intent with a community-based organization for its participation in the development of the project, including the opportunity for an economic interest.

DETERMINATION OF SAFETY IMPACT

Approval of this item will have no impact on safety. The eventual implementation of this joint development project at the Expo/Crenshaw Station will offer opportunities to improve safety for transit riders through better pedestrian and bicycle connections.

FINANCIAL IMPACT

A Short Term ENA does not require a Developer deposit as there will be no third party costs at this time. Funding for staff time related to the Short Term ENA and the proposed project is included in the FY18 budget in Cost Center 2210 (Joint Development) under Project 401045 (Expo/Crenshaw JD).

Impact to Budget

Metro project planning activities and related costs will be funded from local right-of-way lease revenues. Local right-of-way lease revenues are eligible for bus/rail operating and capital expenses. Execution of the Short Term ENA will not impact FY 2018 bus and rail operating and capital budget, Proposition A and C, TDA, Measure R or M administration budget.

ALTERNATIVES CONSIDERED

The Board could choose not to proceed with the recommended action and could direct staff to (a) enter into a full long term ENA, (b) continue clarification talks with the Developer outside of an ENA, or (c) prepare and release a new RFP. Staff does not recommend proceeding with these alternatives because the recommended action will ensure the most transparent process with the community and other public sector stakeholders, and appropriately builds upon the significant community input and procurement process that has transpired thus far. A new RFP process would delay the development of the Site, and Metro and the County may fail to take advantage of currently favorable conditions in the real estate market. Further, if the outcome of the discussion during the Short Term ENA process does not create a project proposal suitable to the community, Metro, or the County, other options could still be considered.

NEXT STEPS

Upon Board approval of the recommended action and corresponding authorization by the County, the Short Term ENA will be executed, and Metro staff, the County and the Developer will commence preliminary negotiations in parallel with community outreach to engage stakeholders in a dialogue about the development proposal. If successful, staff will return to the Board for the authority to execute a full term ENA.

ATTACHMENTS

Attachment A - Site Map

Attachment B - Procurement Summary

Attachment C - Site Plan and Renderings - REVISED

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Phillip A. Washington
Chief Executive Officer

ATTACHMENT A

SITE MAP



PROCUREMENT SUMMARY

EXPO/CRENSHAW STATION JOINT DEVELOPMENT PROJECT/PS37025000

1.	RFP Number: PS37025000	
2.	Recommended Vendor: Watt Companies, dba WIP-A, LLC	
3.	Type of Procurement (check one): <input type="checkbox"/> IFB <input checked="" type="checkbox"/> RFP- Joint Development <input type="checkbox"/> RFP-A&E <input type="checkbox"/> Non-Competitive <input type="checkbox"/> Modification <input type="checkbox"/> Task Order	
4.	Procurement Dates:	
	A. Issued: January 10, 2017	
	B. Advertised/Publicized: January 10, 2017	
	C. Pre-proposal/Pre-Bid Conference: January 25, 2017	
	D. Proposals/Bids Due: April 20, 2017	
	E. Pre-Qualification Completed: N/A	
	F. Ethics Declaration Forms Received: April 20, 2017	
	G. Protest Period End Date: October 23, 2017	
5.	Solicitations Picked up/Downloaded: 136	Bids/Proposals Received: 4
6.	Contract Administrator: Brian Selwyn	Telephone Number: (213) 922-4679
7.	Project Manager: Nicholas Saponara	Telephone Number: (213) 922-4313

A. Procurement Background

This Board Action is to approve a Short Term Exclusive Negotiation Agreement and Planning Document (Short Term ENA) with Watt Companies, doing business as WIP-A, LLC and the County of Los Angeles (County) for the development of 1.77 acres of Metro-owned property and 1.66 acres of County-owned property at the Expo/Crenshaw Station. Board approval of the Short Term ENA is subject to resolution of any properly submitted protest.

This project, if approved, will be administered by Metro per the terms of a Memorandum of Understanding entered into by the County and Metro on January 6, 2017.

The Request for Proposals (RFP) was issued in accordance with Metro's Acquisition Policy and will result in a Short Term ENA.

A pre-proposal conference for this RFP was conducted on January 25, 2017 and was attended by 50 people representing 47 firms. Twenty-three questions were asked at the pre-proposal conference and responses were released prior to the proposal due date.

A total of four proposals were received on April 20, 2017.

B. Evaluation of Proposals

A Proposal Evaluation Team (PET), consisting of staff from Metro Joint Development (JD) and Community Relations, the City of Los Angeles, the County of Los Angeles, and a community-based organization was convened and conducted a comprehensive technical evaluation of the proposal received.

The proposal was evaluated based on the following evaluation criteria and weights:

- | | |
|--|------------|
| • Vision, Scope and Design | 35 percent |
| • Development Team Experience and Financial Capacity | 30 percent |
| • Financials | 20 percent |
| • Implementation | 15 percent |

The evaluation criteria are appropriate and consistent with criteria developed for other similar Joint Development procurements. Several factors were considered when developing these weights, giving the greatest importance to the vision, scope and design, and team experience and financial capacity to undertake the work of this project.

All four proposals were determined to be within the competitive range and are listed below in alphabetical order:

1. APPA Real Estate LLC
2. Crenshaw Corridor Ventures LP
3. NCNvision, LLC
4. Watt Companies, dba WIP-A, LLC

During the week of May 29, 2017, the PET met and interviewed the firms. The firms' project managers and key team members had an opportunity to present each teams' qualifications and respond to the PET's questions. In general, each team's presentation addressed the requirements of the RFP, experience with all aspects of the required tasks, and stressed each firm's commitment to the success of the project. Also highlighted were work plans and perceived project issues. Each team was asked questions relative to each firm's proposed alternatives and previous experience.

Qualifications Summary of Firms within the Competitive Range

WIP-A, LLC

WIP-A, LLC is a wholly-owned subsidiary of Watt Companies, a privately-held, for-profit Southern California-based developer formed in 1947.

The development team also includes Belzberg Architects, RELM (landscape architecture), Nelson/Nygaard (transportation), Harley Ellis Devereaux (design),

Arup (engineering), BuroHappold (sustainability), Ross Group (outreach), and Allan Kotin & Associates (P3 and real estate).

The proposer has constructed and manages a number of large-scaled, mixed use projects in the Los Angeles area. The proposer has established long-term relationships with financial institutions and has demonstrated its ability to assemble financing for other similarly scaled real estate transactions.

APPA REAL ESTATE LLC

APPA Real Estate LLC (APPA) is a privately-held, for-profit Santa Monica real estate investment and development company formed in 2013.

The development team for the proposal also includes Retirement Housing Foundation (RHF) (affordable senior housing developer), Ankrom Moisan Architects (architecture), and SWA Group (landscape architecture).

Although principals have experience on large, public-private partnerships, APPA as a firm has limited independent experience delivering projects of comparable scale and complexity to what is proposed. RHF has a demonstrated track record in developing and managing affordable housing projects.

CRENSHAW CORRIDOR VENTURES LP

Crenshaw Corridor Ventures LP (Crenshaw Corridor LP) is a California Limited Partnership composed of West Angeles Community Development Corporation, a 501 (c)(3) non-profit community development corporation formed in 1994 in affiliation with the West Angeles Church of God in Christ, and Integral Development LLC, a privately-held, for-profit Atlanta-based developer formed in 1993.

The development team also includes Killefer Flammang Architects, AE3 Partners (design and construction administration), Duane Border (landscape architecture), e7 Architecture Studio (sustainability), Dan Rosenfeld (land use consulting), Charles Dunn (real estate leasing), Concord Group (market analysis), Curton Dunsmuir (building contracting), and T.R.U.S.T. South LA (mobility).

The development team has a track record of delivering both large-scale development (Integral) and local, community-based development (West Angeles CDC). The strength of the team was offset by relatively low scoring in proposed development program/vision and financial offer as highlighted later in this report.

NCNVISION, LLC

NCNvision, LLC (NCNvision) is a Special Purpose Entity consisting of NVision Development Group, LLC, National CORE and Capri Investment Group. National CORE (affordable housing developer) and the Los Angeles-based private development firm NVision Development Group would serve as co-developers of the project.

The development team also includes Capri Investment Group (financial partner), Build Group (construction manager), QDG Architecture (design), Hart Realty Advisors (project management), and Nuvis Architecture (landscape architecture).

NVision Development Group, LLC has limited experience delivering projects of comparable scale and complexity to what is proposed. Co-developer National CORE has a demonstrated track record in developing and managing an extensive portfolio of affordable housing projects.

Summary of Proposed Development Programs¹

Each proposer was required to submit a table with gross square footage for each proposed use, including public and private open space, market rate and affordable housing units, retail or office space, parking, and any other information relevant to the development program. This information is summarized below.

Residential

	WIP-A, LLC	APPA	CRENSHAW CORRIDOR LP	NCNvision
Residential Units (#)	492	375	406	500
# units 30% AMI	-	-	51	-
# units <50% AMI	73	-	-	-
# units <60% AMI	-	125	17	177
% Affordable Units <60% AMI²	15%	33%	17%	35%
# units <80% AMI	-	-	-	68
# units <120% AMI	-	-	22	-
# units <140% AMI	-	-	-	-
% Moderate Units	-	-	5%	14%

¹ The Development Program is based on proposal submissions. The recommended proposal is preliminary and subject to change during the transaction negotiation.

² Per Metro Joint Development Policy, units qualifying as "affordable" are restricted to households earning 60% or less of the Area Median Income (AMI) as defined by the California Tax Credit Allocation Committee (TCAC).

Non-Residential Uses

	WIP-A, LLC	APPA	CRENSHAW CORRIDOR LP	NCNvision
Office (SF)	-	93,925	-	-
Retail/Dining (SF)	47,500	56,372	42,250	109,882
Community Facility (SF)	12,500	5,329	9,000	40,000
Parking (on-site spaces)	591	406	282	356
Bicycle Storage	542	1,340	420	120
Public Open Space (SF)	126,670	43,500	76,407	67,155

Summary of Proposed Funding and Financial Terms³

Each proposer was required to submit the anticipated sources of proposed project funding. Proposers were also required to submit financial officers to Metro and the County which included key financial information such as ENA fee, lease period, rents at all stages of development, and any other terms proposers would like to offer. To further evaluate each proposal, financial projections were calculated to assess the value of each offer and are summarized below.

Funding Sources Ratios

	WIP-A, LLC	APPA	CRENSHAW CORRIDOR LP	NCNvision
Equity	39.5%	33.3%	16.8%	18.3%
Conventional Debt	60.5%	50%	65.8%	44.6%
Competitive Grants	-	16.7%	14.8%	37.1%
Other	-	-	2.6%	-

Site A Financial Terms (County)

	WIP-A, LLC	APPA	CRENSHAW CORRIDOR LP	NCNvision
Ground Lease Term and Options	66 years	65+17+17 years	66 years	99 years
ENA Fee	\$25,000	\$275,000 ⁴	\$25,000	\$25,000
Holding/Construction/Lease-Up	\$641,070	\$500,000	\$ -	\$511,712
NPV of Ground Rent Over Term ⁵	\$25,957,880	\$12,094,454	\$1,559,389	\$19,435,692
Potential Additional Rent	Yes ⁶	No	No	Yes
Participation Sale/Refinance	Yes	Yes	Yes	No

³ The Funding and Financial Terms are based on proposal submissions. The recommended proposal is preliminary and subject to change during the transaction negotiation. The Board will consider final terms as part of the proposed Ground Lease approval.

⁴ Refundable under certain conditions.

⁵ Projected net present value (in 2018 dollars) of ground rents to be received by the County over the lease duration, beginning with the first stabilized year of operation using a 4% discount rate.

⁶ "Look-back" provision that would provide a one-time payment to the County in the event the project proves to be more profitable than projected.

Site B Financial Terms (Metro)

	WIP-A, LLC	APPA	CRENSHAW CORRIDOR LP	NCNvision
Ground Lease Term and Options	65 years	65+17+17 years	66 years	60+39 years
ENA Fee	\$25,000	\$275,000 ⁷	\$25,000	\$25,000
Holding/Construction/Lease-Up	\$641,070	\$500,000	\$325,000	\$609,113
NPV of Ground Rent Over Term ⁸	\$24,676,819	\$12,094,454	\$6,665,086	\$20,696,740
Potential Additional Rent	Yes ⁹	No	Yes	Yes
Participation Sale/Refinance	Yes	Yes	Yes	No

⁷ Refundable under certain conditions.

⁸ Projected net present value (in 2018 dollars) of ground rents to be received by Metro over the lease duration, beginning with the first stabilized year of operation, using a 4% discount rate.

⁹ "Look-back" provision that would provide a one-time payment to Metro in the event the project proves to be more profitable than projected.

A summary of the PET's scores is below.

1	WIP-A, LLC	Average Score	Factor Weight	Weighted Average Score	Rank
2	Vision, Scope and Design	78.67	35.00%	27.53	
3	Development Team Experience and Financial Capacity	78.33	30.00%	23.50	
4	Financials	79.44	20.00%	15.89	
5	Implementation	77.92	15.00%	11.69	
6	Total		100.00%	78.61	1
7	APPA				
8	Vision, Scope and Design	76.50	35.00%	26.78	
9	Development Team Experience and Financial Capacity	66.94	30.00%	20.08	
10	Financials	66.39	20.00%	13.28	
11	Implementation	71.25	15.00%	10.69	
12	Total		100.00%	70.83	2
13	Crenshaw Corridor LP				
14	Vision, Scope and Design	70.33	35.00%	24.62	
15	Development Team Experience and Financial Capacity	76.67	30.00%	23.00	
16	Financials	66.67	20.00%	13.33	
17	Implementation	63.33	15.00%	9.50	
18	Total		100.00%	70.45	3
19	NCNvision				
20	Vision, Scope and Design	65.00	35.00%	22.75	
21	Development Team Experience and Financial Capacity	60.56	30.00%	18.17	
22	Financials	63.33	20.00%	12.67	
23	Implementation	56.67	15.00%	8.50	
24	Total		100.00%	62.09	4

C. Background on Recommended Developer

The recommended firm, WIP-A, LLC, is a wholly owned subsidiary of the Watt Companies (Watt). Watt was established in 1947 and has grown into one of the largest owners, managers, and developers of commercial and residential real estate on the West Coast. Watt offers a broad range of services and solutions, including building and development, investment, advisory and asset management. Throughout its history, it has successfully developed properties in partnership with land owners and institutional partners. The senior members at Watt Companies have more than 150 collective years of industry experience. The firm owns and manages a real estate portfolio of \$1.5 billion. Two examples of local projects in which Watt played a major role are Crenshaw Plaza, a 139,000 square foot neighborhood retail center located at the southeast corner of Crenshaw Blvd. and Slauson Ave. in Los Angeles, and Renaissance at Inglewood, a master planned community in the City of Inglewood featuring 375 single family detached homes.

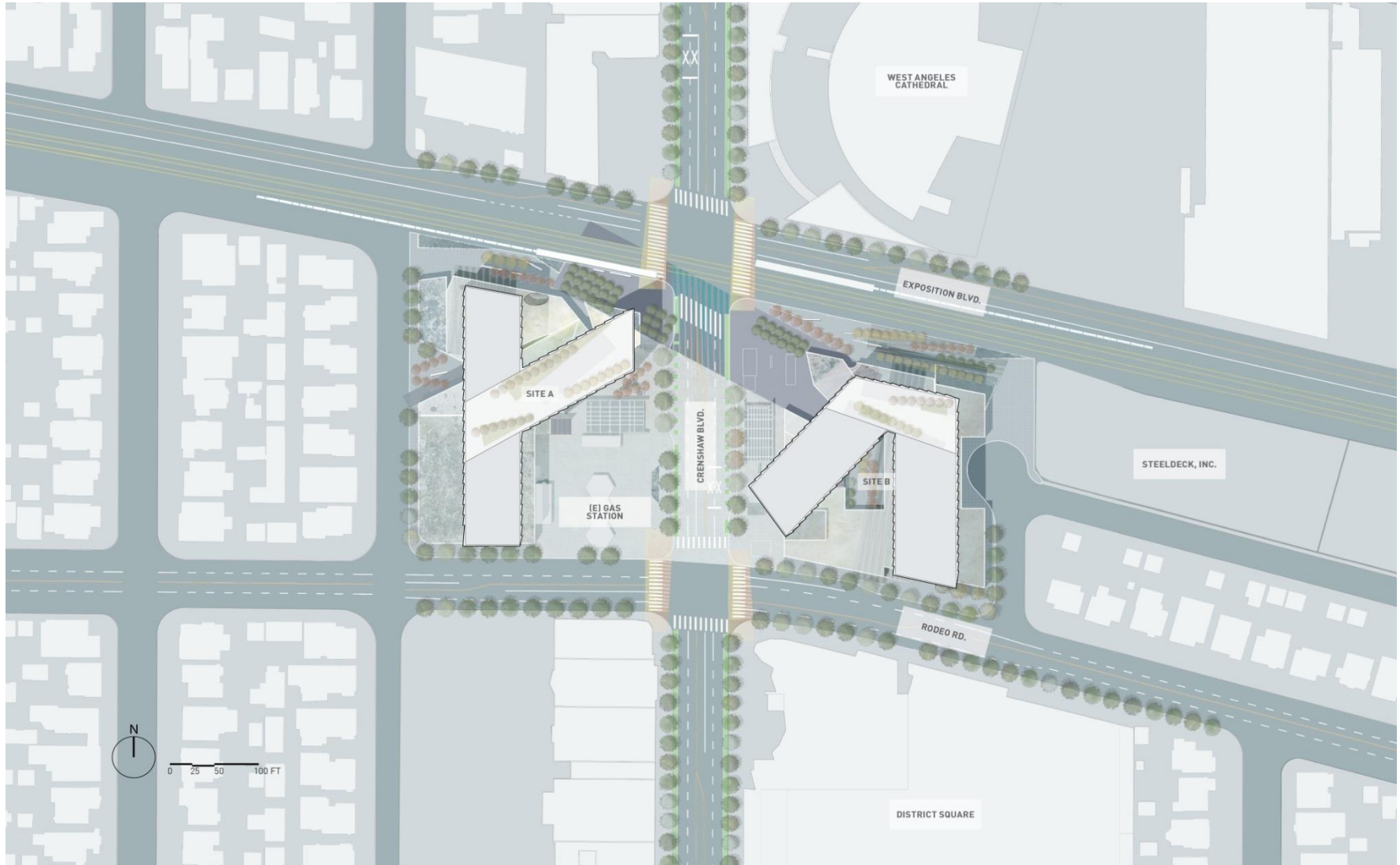
The proposed team assembled by WIP-A includes firms with experience in architecture, engineering, urban design, community outreach, and public/private partnerships. Belzberg Architects has a diverse portfolio of design projects in the USA, Canada, and Mexico. RELM (formerly Melendrez) is a landscape architecture and urban design firm responsible for notable projects such as Blossom Plaza adjacent to the Gold Line Chinatown Station. Nelson/Nygaard Consulting Associates, Inc., founded in 1987, is an internationally recognized firm committed to developing comprehensive transportation systems. Harley Ellis Devereaux (HED) was founded in 1908, and has a large portfolio of mixed-use urban infill developments. Arup is a global design and business consulting firm with technical engineering expertise. BuroHappold Engineering delivers design solutions for environmentally friendly buildings, communities and organizations. Allan Kotin has over 50 years in public/private joint ventures. The Ross Group provides strategic planning and public meeting coordination services, and staff members have held prominent leadership positions in the Crenshaw Chamber of Commerce and the Crenshaw Family YMCA. Team members have worked together in smaller combinations on several projects, and bring a number of best practices from other notable transit-oriented development projects throughout Southern California.

D. DEOD Summary

Metro encourages Development Teams to create opportunities to include Small Business Enterprise (SBE), Disadvantaged Business Enterprise (DBE) and Disabled Veteran Business Enterprise (DVBE) firms in their projects, through professional or construction services.

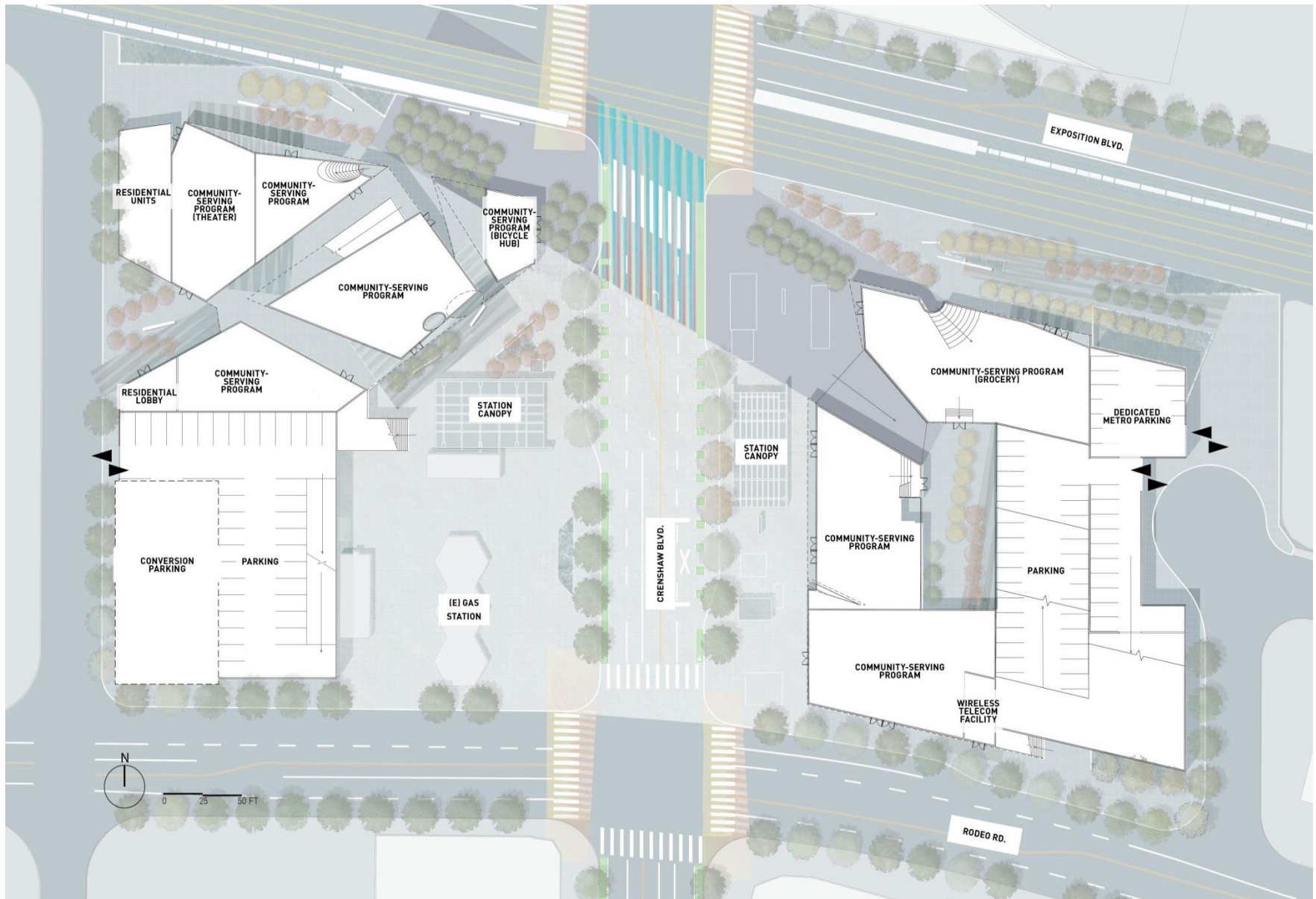
WIP-A, LLC, the developer and manager of the project, is a majority woman-owned business enterprise. The team also includes RELM, a Metro-certified SBE firm which specializes in landscape architectural services.

ATTACHMENT C - REVISED
SITE PLAN AND RENDERINGS



Site Plan

ATTACHMENT C (CONT.)



Ground Level Floor Plan

ATTACHMENT C (CONT.)



Perspective looking south

ATTACHMENT C (CONT.)



View of ground floor retail, Site B

Expo/Crenshaw Joint Development Project



Executive Management Committee

November 16, 2017

Agenda Item 12



Metro

Recommendations

- **Enter into a two-phase, six-month Short Term ENA with Watt Companies, dba WIP-A, LLC**
 - Perform community outreach
 - Refine project based on community input
 - Identify additional community based partnerships
 - Letter of Intent with a CBO for participation in Project required within first three months

Expo/Crenshaw Joint Development Site

SITE A

Owner: Los Angeles County
Site: 1.66 acres
Use: County Probation Department

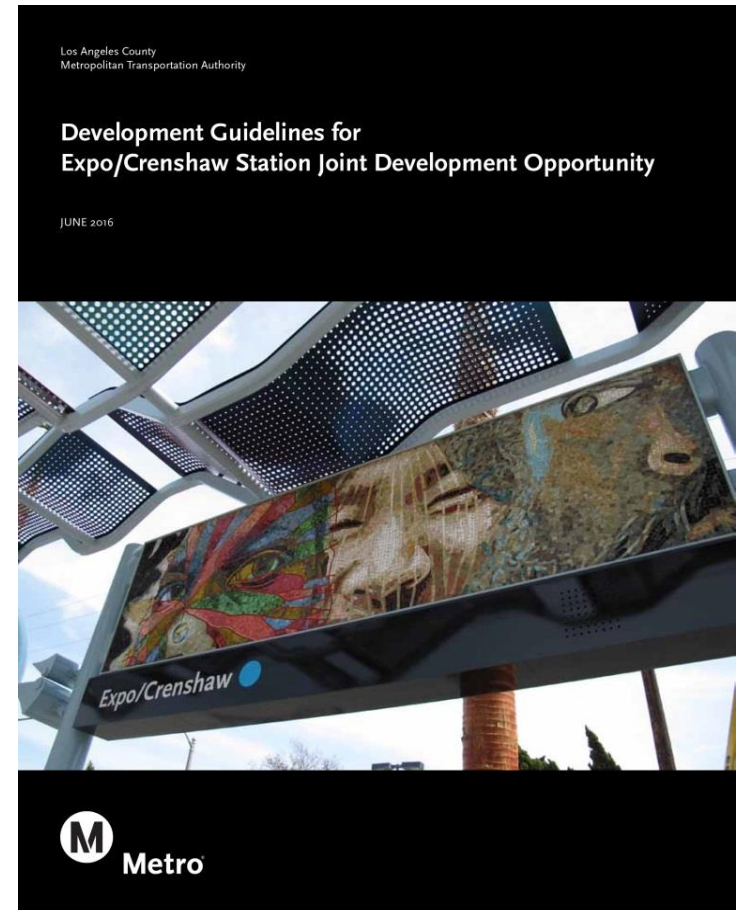
SITE B

Owner: Metro
Site: 1.77 acres
Use: Construction Staging



Expo/Crenshaw Development Guidelines

1. A culturally distinct and iconic gateway
2. Walkable, safe community with open space
3. High-quality and local-serving uses/retail
4. Mixed-income housing
5. Foster community job growth
6. Sufficient parking
7. Ongoing community input



Evaluation

Process

- January 2017 – RFP Issued
- April 2017 – Four proposals received
- May/June 2017 – interviews, requests for clarifications
- July 2017 – invitation to submit final offer (top three firms only)
- August – final offers received, scoring completed

Watt Companies - Proposal Strengths

- Most responsive to Development Guidelines
- 70 years of experience including 25 year presence along Crenshaw Corridor
- Team members have worked on other notable TOD and urban infill sites
- Demonstrated capacity to deliver project
- Strongest financial offer

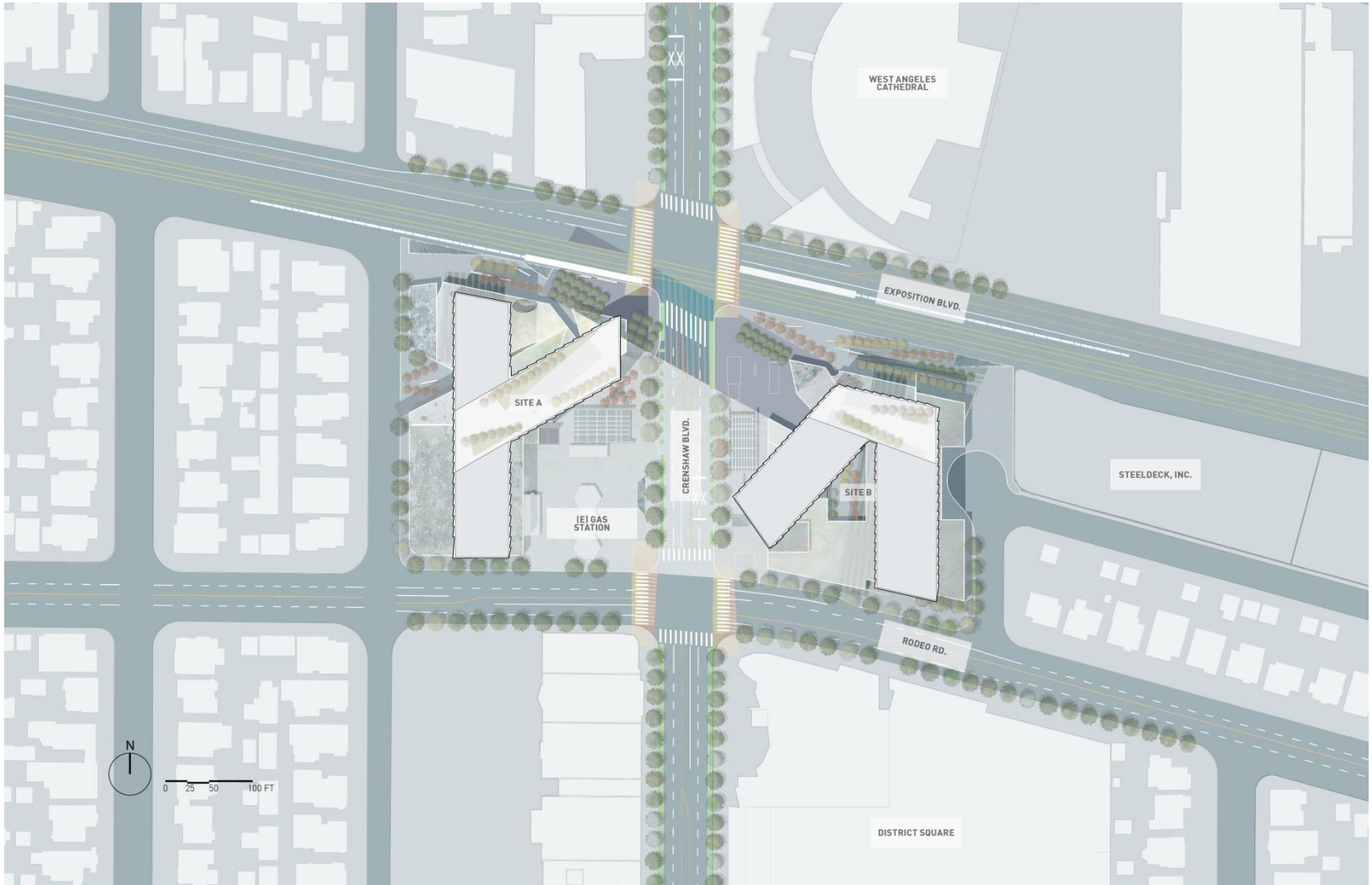
Proposed Project

- 492 total residential units, 73 units (15%) affordable at 50% AMI
- 47,500 SF commercial/retail space
 - Grocery store, locally-owned and operated restaurants
 - 12,500 SF of community serving space and business incubator-type facilities
 - Auditorium and mobility hub/bike station facility
 - Nearly 3 acres of open space

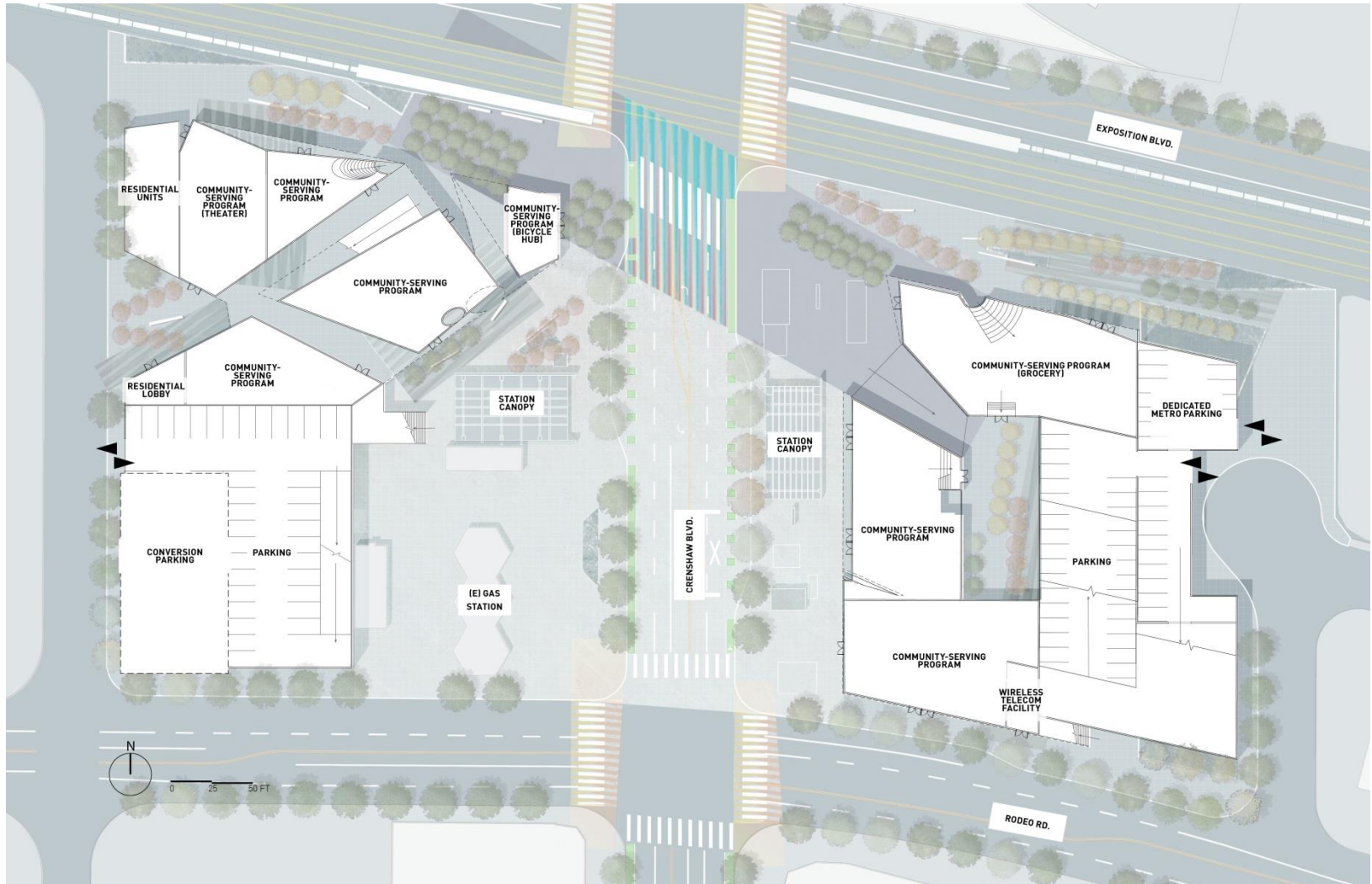


Perspective looking south down Crenshaw Boulevard

Site Plan



Ground Floor Plan



Next Steps

- December 2017 - County Board of Supervisors to consider Short Term ENA
- Early 2018 – Initiate community outreach; enter into formal community partnership(s)
- Spring/Summer 2018 – Return to Metro and County Boards for authorization to enter into a full term ENA if Short Term ENA objectives and requirements are met



View of ground floor retail, Site B