

CITY OF WESTMINSTER			
PLANNING APPLICATIONS COMMITTEE	Date 12 April 2016	Classification For General Release	
Report of Director of Planning		Ward(s) involved Lancaster Gate	
Subject of Report	Development Site At 117 - 125 Bayswater Road, 2 - 6 Queensway, Consort House And 7 Fosbury Mews, London, W2.		
Proposal	Demolition and redevelopment of 117 - 125 Bayswater Road, together with 2 - 6 Queensway and 7 Fosbury Mews for a new building comprising three basements, ground and nine upper storeys to include 55 residential units and ancillary residential facilities (Class C3), together with retail (Class A1) and/or car showroom (sui generis) unit, a retail (Class A1) and/or restaurant (Class A3) unit, a dentist (Class D1) and a spa/re use (Class D2), highway works and the use of car parking within the basement of Consort House.		
Agent	Mr Nick Delaney		
On behalf of	Bayswater Road (Holdings) Ltd		
Registered Number	15/10671/FULL	Date amended/ completed	4 December 2015
Date Application Received	9 November 2015		
Historic Building Grade	Unlisted		
Conservation Area	Queensway Adjacent to Bayswater and Royal Parks Conservation Areas.		

1. RECOMMENDATION

Does Committee agree that:-

- 1) The loss of the unlisted buildings of merit would result in substantial harm to the Queensway Conservation Area and for the loss to be considered acceptable the scheme must deliver substantial public benefits.
- 2) The redevelopment of this site could be acceptable in principle providing:-
 - a) the replacement building is reduced in size to mitigate its harm; and
 - b) that substantial benefits are delivered in accordance with the NPPF
- 3) That the proposed replacement building requires the following amendments in order to reduce its impact to adjacent residents and visual harm to the Queensway Conservation Area and the Royal Parks:-

- a) A reduction in the height of the building by two storeys – one middle floor and one floor to the roof.
- b) Alterations to the shop fronts to introduce a stronger and more detailed base to the building.
- c) Consideration of a single material for balconies to streamline the use of materials.
- d) Alterations to the height, bulk, proximity and detailed design of the rear elevation, to reduce the unacceptable impact of the building on the amenities of neighbouring residents in Fosbury Mews, Inverness Terrace and Consort House.
- 4) The proposed car showroom at ground and basement level accessed from Bayswater Road is unacceptable in transportation terms and should be omitted from the proposal.
- 5) A significant increase in public benefits is required in order to outweigh the harm caused from the loss of the unlisted buildings of merit and the bulk of the replacement building. This should be in the form of more substantial public realm improvements along Queensway.
- 6) Subject to 1-5 above being agreed and the applicant making the necessary changes, that conditional permission is granted, subject to a S106 legal agreement in consultation with the Chairman and subject to concurrence of the Mayor of London.

2. SUMMARY

Planning permission is sought for the redevelopment of the site and construction of a new building comprising 3 basements, ground and 9 upper storeys to provide a mixed use building of residential (55 flats), dentist, spa, and flexible use for Retail and or car showroom and Retail and or Restaurant.

A number of elements of the proposal are supported in planning terms, although the car showroom use is not supported and the potential impact of the development on the amenities of surrounding residents raises significant concern.

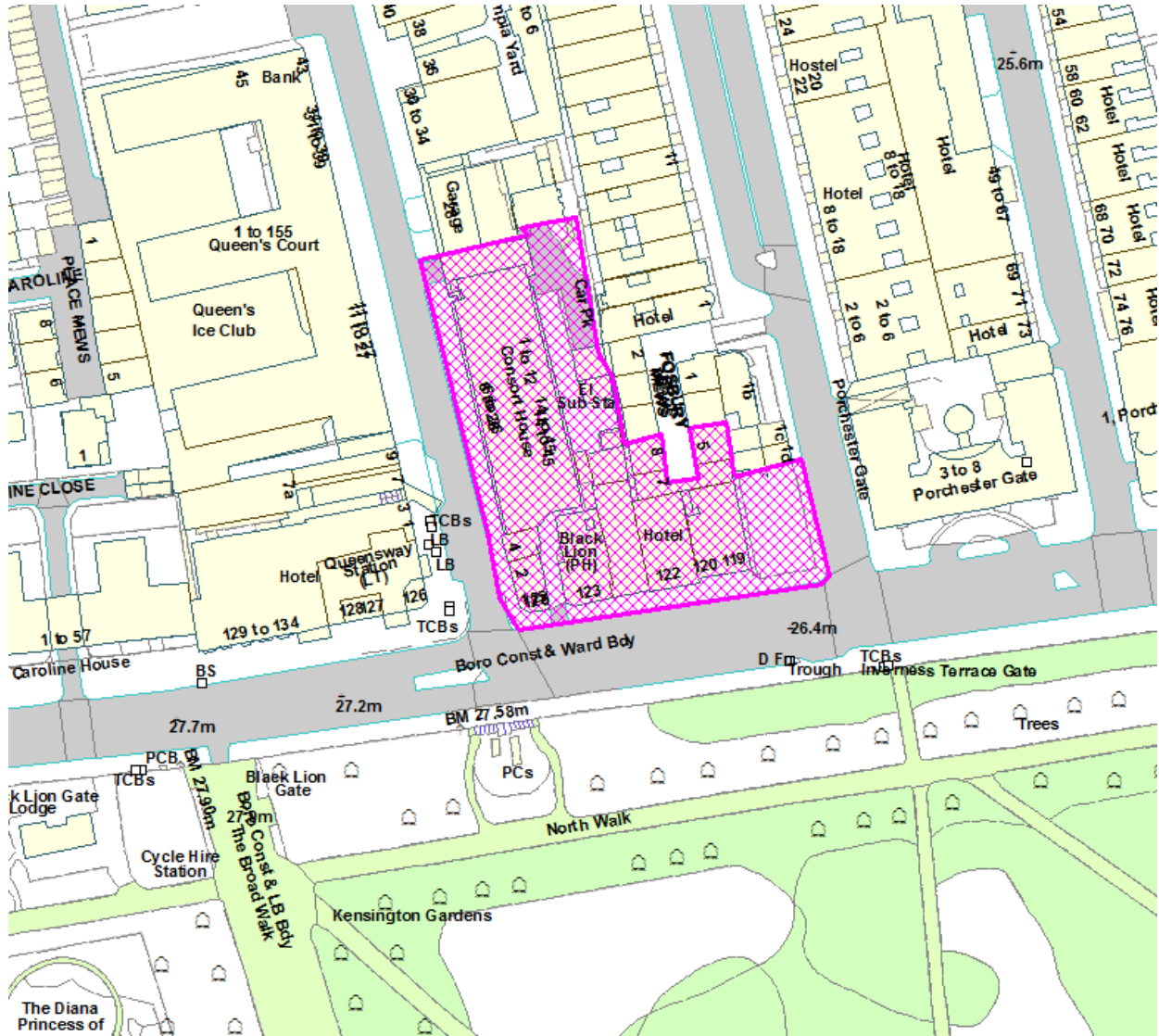
The proposal involves the total loss of buildings of merit in the conservation area and under the tests set out under the National Planning Policy Framework (NPPF) this loss is viewed as resulting in substantial harm to the heritage assets. The loss of the existing buildings and the replacement building (due to its excessive height and mass) are considered harmful to the conservation area and has brought about objections from Historic England, The Victorian Society, The Royal Parks, The Greater London Authority, The Royal Borough of Kensington & Chelsea, Campaign for Real Ale (loss of Black Lion PH), the South East Bayswater Residents Association and a number of local residents.

In such cases it must be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Taking into account the applicants limited package of benefits, including a financial contribution towards streetscape improvements in connection with the City Council's Queensway and Westbourne Grove Streetscape Initiative Project, and new gates to Kensington Gardens which has brought about objection from The Royal Parks, it is not considered that such justification has been demonstrated.

Given these key issues, Members are asked to agree that it is necessary for the applicant to make a number of revisions to the proposed development to seek to address design, land use and amenity issues and also to significantly increase the public benefits resultant from the proposal if a favourable recommendation is to be forthcoming.



3. LOCATION PLAN



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4. PHOTOGRAPHS



5. CONSULTATIONS

WARD COUNCILLORS FOR LANCASTER GATE

Any response to be reported verbally

GREATER LONDON AUTHORITY

Objection. The Mayor considers that the application does not comply with the London Plan and is of the opinion that the benefits of the development do not outweigh the loss on non-designated heritage assets and the substantial harm caused to the Conservation Area and the development proposal are contrary to London Plan policy. The Mayor is also of the opinion that the design of the replacement building would also be harmful to the Conservation Area.

HISTORIC ENGLAND (LISTED BUILDS/CON AREAS)

Objection. Proposal would result in considerable and unjustified harm to the historic environment and would fail to constitute sustainable development. The demolition of the existing buildings and their replacement with the proposed development would cause substantial harm to the special character and appearance of the Queensway Conservation Area. Harm has also been identified to the significance of the Grade 1 registered Kensington Park Gardens and the special character and appearance of the Royal Parks Conservation area. Does not consider there to be any clear benefits of the scheme that could be considered in mitigation against the harm caused.

HISTORIC ENGLAND (ARCHAEOLOGY)

Comments. Site does not lie within an archaeological priority area; it does lie along/close to the line of a major Roman Road which is thought to follow Bayswater Road. The development therefore has the potential to impact upon the remains of the road or associated roadside features. As such a condition is requested for seek a two stage process of archaeological investigation.

THE ROYAL PARKS

Objection. Key concern is the encroachment of the public realm into Kensington Gardens as a part of improvements to the road junction. These wider aspirational plans for the public realm heavily impact upon Grade I listed Crown Land and the proposed intervention into the park is not appropriate. The mass of the development is an additional concern and would form an imposing and unwelcome view from Kensington Gardens. Support view of Historic England that the proposals would result in substantial harm to the special character and appearance of the Queensway conservation area and would result in harm to the setting of the grade 1 registered Kensington Park Gardens. Reference is made to the Royal Parks Kensington Gardens Plan 2006-2016 which states "The aim should be to retain the green and verdant setting of the Park, with skyline views principally formed by the tree canopy.

THE VICTORIAN SOCIETY

Objection. The proposal (by virtue of extent of demolition and replacement building) is a highly inappropriate and seriously damaging development, which would cause substantial and unjustified harm to the significance of the Queensway Conservation area.

FRIENDS OF HYDE PARK & KENSINGTON GARDENS

Any response to be reported verbally.

THE GARDENS TRUST

Any response to be reported verbally.

LONDON HISTORIC PARKS AND GARDENS

Any response to be reported verbally.

TRANSPORT FOR LONDON

Comments. Concerned with excessive level of car parking. Cycle Parking for non residential units does not comply (64 spaces required as well as cycle parking for the dentist). Satisfied that effects on Bayswater Road (Strategic Road Network) can be managed, supports footway widening to Bayswater Road and Inverness Terrace. Request conditions to secure Construction and Logistic Plan (CLP) and Delivery and Service Plan (DSP), Electric Vehicle Charging Points (EVCP) and Blue Badge car parking. Suggest travel plan to secure funding for cycle hire membership for each residential unit for a minimum of 1 year – up to 3 years (£90 per unit per year) and cycle changing facilities for staff of all commercial uses on site. Further suite of comments to be provided to the GLA which may contain a suite of mitigation measures pertaining to walking, buses, or public transport generally.

LONDON UNDERGROUND LIMITED

Any response to be reported verbally.

ENVIRONMENT AGENCY (THAMES REGION)

No comment.

THAMES WATER UTILITIES LTD

Comments. General comments provided and conditions requested with regard to drainage strategy, piling method statement, ground water discharging into public sewers, non-return valves fat traps, together with recommended informatives.

NHS CENTRAL LONDON

Any response to be reported verbally.

WESTMINSTER PRIMARY CARE TRUST

Any response to be reported verbally.

ROYAL BOROUGH OF KENSINGTON & CHELSEA

Objection. The development, due to excessive height, bulk, massing and forward buildings line, would be an overly dominant and unsympathetic addition to the townscape. The development would be visible from within the conservation area of Royal Borough and from the Grade I registered Kensington Gardens and would detract from these views and fail to preserve the character and appearance of the Kensington Palace Conservation area, and the setting of the Grade 1 Registered Garden.

SOUTH EAST BAYSWATER RESIDENTS ASSOCIATION (Two responses)

Objection (original holding response). Application poses a number of important issues, height, bulk, design of the new building, including forward building line, in such a prominent location. Members would like to see retention of unlisted buildings of merit and do not like the new building, bulk, height and office like appearance and consider it to be inappropriate in this location and from views from Inverness Terrace.

We have a predicament as opportunity for development (of vacant corner plot, down market hostel, shops and shop fronts of poor quality), has to be weighed against the loss of three unlisted buildings of merit within the Queensway conservation area. Would like to retain these buildings, but acknowledge that this site or part of it does need to be developed as the situation cannot stay as it is forever. Nobody asked for the Black Lion PH to be make a community asset, probably as it was mainly frequents by tourist. There are aspects of the new building upon which we are divided as it is bulky, tall and top heavy and would dominate the skyline. The proposal ticks various boxes in terms of mix of flats, parking, servicing etc. A substantial sum is offered for public realm improvements and funding for pathways and improved gates to Kensington Gardens. Question affordable housing offer. Without the benefit of a full breakdown of what is being offered in terms of public realm and affordable housing, difficult to decide if the merits of the scheme outweigh the loss of the three buildings and the height, bulk and design of the new building. Suggest restrictions on 1) servicing hours and to prevent servicing from Bayswater Road and Queensway 2) hours of use of commercial units in stress area 3) require commercial units to be ready for occupation before residential units occupied 4) omission of car showroom 5) omission of north facing green wall 6) shop front and signage strategy 6) unallocated car parking 7) affordable housing contribution retain for that purpose 8) No cluttering or canopies to balconies 9) no illumination of building. Would like to see new tree planting and lighting and highways works independent of gates to the park and removal of green wall from Fosbury Mews.

BAYSWATER RESIDENTS ASSOCIATION

Any response to be reported verbally.

CAMPAIGN FOR REAL ALE (CAMRA)

Objection. Loss of former Black Lion Pub as an unlisted building of merit within the Queensway Conservation area, which dates to 1889. Whilst the interior is completely refitted, does retain some fine copper relief panels depicting scenes from taking of the Shrew by Frederick T Callcot. The submission totally dismisses the former Black Lion PH and does not give any information about the importance or names of the architects or of the importance of the pictorial metal panels inside the pub or the contribution the pub has made to the community and character of the area right up to its closure in 2015. The fact that the pub is now a cafe does not mean it could not revert to being a pub in the future. The Black Lion was an extremely popular pub and its loss is still mourned to this day.

AFFORDABLE HOUSING SUPPLY MANAGER

Comments. Regret that a payment of £8.5m in lieu (Pil) of on-site affordable housing is proposed. Note consultants advice that £8.5m is the maximum reasonable amount that the development can afford. Also note that the applicant is currently in discussions with the owner of 382-386 Edgware Road with a view to purchasing the site as a potential location for off-site affordable housing provision which would be welcomed as an alternative to Pil, as it would assist the Council with its future re-housing needs associated with the proposed regeneration of Church Street.

ADULT & COMMUNITY SERVICES

Any response to be reported verbally.

CHILDREN'S SERVICES

Any response to be reported verbally.

HIGHWAYS PLANNING

Objection. Lack of details to assess the loss of the existing public car parking spaces, lack of detail of the provision of car parking (within the public car park) for occupiers of residential units, lack of detail to demonstrate that the car showroom use would not adversely impact on the surrounding highways network to other road users and traffic flows. Conditions/S106 legal agreement recommended to include; further cycle parking for commercial uses and access to these spaces; no food retail uses; no car showroom use; servicing management plan; vertical clearance of 2.6m over highway; electrical vehicle charging points; unallocated car parking; highways alterations, dedication

CLEANSING

No objection. Suitable provision is made for the storage of waste and recyclables. Recommend condition to ensure provision is made permanently available.

ARBORICULTURAL SECTION

Comments. Recommend condition to secure bespoke details for green wall to ensure it is effective. Tree planting to Inverness Terrace is welcomed, if on private land needs to be controlled by condition, if on highway needs to be controlled through a S106 legal agreement. Request financial contribution towards street tree planting in the area.

BUILDING CONTROL

Any response to be reported verbally.

DESIGNING OUT CRIME

No objection. No major concerns

ENVIRONMENTAL HEALTH

Any response to be reported verbally.

ADJOINING OWNERS/OCCUPIERS AND OTHER REPRESENTATIONS RECEIVED

No. Consulted: 601

Total No. of replies: 30

No. of objections: 23 representations including from Consort House Resident's Association and Park Villas Resident's Association.

No. in support: 7

Representations of objections on some or all of the following grounds:-

Land use

- Scheme makes no contribution to the area
- In general terms welcome the proposal- but the current plan is detrimental
- Most of apartments will be sold to foreigners and absentee property owners will be high.
- Shops will be occupied by brand chains and have no utility for existing residents
- No merit for local community.
- Leaseholder (6 years remaining) of 2 Queensway and 125 Bayswater Road concerned that proposal involves demolition of their premises whilst they are still in occupation and trading. Construction management plan incorrectly refers to full

vacant possession. Suggest that the developer has no right to remove them within the 6 years remaining on their lease. Legal proceedings have begun.

- A contribution towards affordable housing is not the same as social housing

Amenity

- Impact on Fosbury Mews:-
- Loss of daylight and sunlight
- Loss of privacy from windows and balconies
- Impact of 10-storey building overhanging shared cobbled mews.
- Dramatic impact on amenities of Mews
- Ground floor rear facade with substation and fire escape doors gives an industrial appearance within the Mews which destroys the historical street pattern and traditional buildings and would result in noise and disturbance.
- This private residential mews should not be flooded with hundreds of people during fire drills, visiting electrical engineers or gas inspectors.
- Proposed development is higher and broader than previously consented schemes.

Impact on Consort House, 26 Queensway.

- A 30m wall will be a couple of metres from first floor living kitchen and bedroom
- Impact of loading bay outside Consort House flats, already problems with plant noise, litter, waste collection, unloading/loading.
- Loss of daylight and sunlight
- Block views of Kensington Gardens
- Impact of works during construction
- Potential for structural damage and subsidence
- Devalue property
- Increased potential for pest problems

Townscape and Design

- Demolition of unlisted buildings of merit including 7 Fosbury Mews- should be preserved
- Appalling monstrosity in full view of the park
- New building is an eyesore
- Fosbury Mews is described in the conservation area audit as forming a surprising peaceful enclave hidden behind the main through fare; private character and intimate feel emphasised by the smaller scale of buildings
- Proposed development would have a further projecting building line to Bayswater Road than other buildings around the park.
- Overbearing and out of scale and character with surroundings
- Design is disrespectful
- Proposed development has moved north and now sits on top of the mews where its scale and proximity will adversely affect the mews.
- Building is clumsy, overbearing and out of character with the area.
- Proposed design makes little or no attempt to harmonise or contribute to the visual or historic qualities of the area.
- Fails to respect local context and street patterns, or scale and proportions of surrounding buildings and is entirely out of character of the area

- Proposed building covers the entire site and more by jutting out and overhanging public land and represents a 5-fold increase in building volume.
- Inappropriate in landmark location
- Proposed building is devoid of any individual character or ornament and the last thing residents want.
- Substantial harm to the special character and appearance of the Queensway Conservation Area
- Harm to setting of Grade 1 registered Kensington Park Gardens
- Impact on views from Royal Park
- Bulbous blockhouse out of keeping with the general architecture along Bayswater Road
- No need for new gates to the park

Environmental

- No outside space

Transportation

- Proposal does not deal with the difficult pedestrian access on Bayswater Road, pavement should be widened.
- Impact on car parking

Other Matters

- Question whether previous permission have been implemented and or now expired. If expired applicant should not rely on them.
- No.7 Fosbury Mews is shown deeper on plans than on land registry
- Proposal is contrary to Human Rights Act
- Impact on right of access for 1c/d Inverness Terrace.

Representations of Support on some or all of the following grounds:-

- Will result in Community benefits, including retail and dining opportunities, social housing contribution, public art and leisure facilities.
- Area of proposed development is dilapidated, scruffy and prone to squatters.
- Proposed development is well conceived, elegant and appropriate scale
- It would be a wasted opportunity not to refurbish and invest in the area.
- De-cluttering of street furniture
- Splendid looking gates to Hyde Park
- Still a big building at the end of Inverness Terrace but design works well and is a more harmonious scheme.
- Developers have listened to resident's concerns
- Catalyst for much needed change in the area
- New pavement, roads and shop fronts
- Long standing concern over the current state of local neighbourhood of Queensway and Bayswater Road – proposed is a significant improvement
- Regeneration of Queensway long overdue
- New design is attractive and will look iconic against the backdrop of the Royal Parks.

PRESS ADVERTISEMENT / SITE NOTICE: Yes

6. BACKGROUND INFORMATION

6.1 The Application Site

The site comprises of a street block between Queensway and Inverness Terrace incorporating 117-125 Bayswater Road, Nos.2-6 Queensway, basement car park to Consort House & No.7 Fosbury Mews. The entire site is located within the Queensway Conservation Area and lies adjacent to both the Bayswater Conservation Area (to the east) and the Royal Parks Conservation Area (to the south). Kensington Gardens, on the opposite side of Bayswater Road, which forms part of the Royal Parks Conservation Area, is listed as a grade I park on the Register of Historic Parks and Gardens. The nearest listed buildings are the grade II listed Victorian terraces on Inverness Terrace.

117-118 Bayswater Road occupies the corner site at the junction with Inverness Terrace. It is a vacant plot enclosed by hoarding and has been vacant for a number of years following a fire on the site in the early 1980's.

119-121 Bayswater Road comprise of a group of four unlisted five storey Victorian Terrace properties with existing/previous ground floor commercial uses (pizza restaurant, a tourist centre and a money exchange) together with the entrance to the Bayswater Hotel which occupies the upper floors.

122 Bayswater Road is a five storey unlisted building of merit with a ground floor bureau de change and the upper floors are associated with the Bayswater Hotel.

123 Bayswater Road is the former Black Lion Public House, an unlisted building of merit. A Certificate of Immunity from listing has been issued by Historic England. In the absence of an application for it to be designated as an Asset of Community Value, the public house was converted to a coffee shop.

125 Bayswater Road occupies the corner site at the junction with Queensway. It is a six storey unlisted building of merit with ground floor money exchange and residential use above.

4 Queensway is a three storey unlisted building housing a gift shop and dentist.

6 Queensway is an unlisted single storey element that forms the southern end of Consort House in use as a gift shop/bureau de change

7 Fosbury Mews is a modern residential mews house which along with the entire mews is an unlisted building of merit.

Overall the site is in mixed use purposes for retail, restaurant, dentist, hotel and residential uses. The site along with the length of Queensway and Westbourne Grove is located within the designated Queensway/Bayswater Road Stress Area. Furthermore, most of the Bayswater and the Queensway frontages form part of the Queensway/Westbourne Grove Major (District) Shopping Centre. 119-123 Bayswater Road is designated

secondary frontage, with 125 Bayswater Road and 2-6 Queensway are designated as Core frontage.

The site is also in close proximity to the City Council's Queensway and Westbourne Grove Streetscape Improvement Project. The City Council in collaboration with local stakeholders has been working on a Queensway and Westbourne Grove Streetscape improvement project, which sets a plan for improving both streets which form the City of Westminster's largest shopping area outside of the West End to create a pleasant place for shoppers, visitors and residents. The improvements are dependent on funding and pooling of resources from Transport of London, the City Council and businesses and as such may take some time to be implemented. Key design proposal include improved pedestrian environment by reducing road width and widening footways and removing clutter, improved pedestrian crossings, new tree planting, paving, street lighting and dedicated delivery zones.

The site is located in close proximity to Bayswater and Queensway London Underground Stations (the central line tunnels run beneath Bayswater Road) and a bus stop is located outside of 119 Bayswater Road which serves a number of bus routes. Bayswater Road is part of the Strategic Road Network (SRN) with Queensway and Inverness Terrace part of the local Road Network.

The site is surrounding buildings to the north; east and west are predominantly residential. Consort House (with an 11 storey tower) lies to the north of 123-125 Bayswater Road. Fosbury Mews to the north of 119-121 Bayswater Road, 1b/c/d Inverness Terrace to the rear of 117-118 Bayswater Road. To the east is the large residential block of Porchester Gate and to the west is the 6-storey Hilton hotel.

6.2 Recent Relevant History

15/10990/EIASCR

Request for Screening Opinion pursuant to Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (amended 2015) to determine whether an Environmental Impact Assessment is required for the mixed use redevelopment of the site.

Not required 4 December 2015

15/07320/CLEUD

Use of basement and ground floor (Black Lion Public House, 123 Bayswater Road) as retail coffee shop (Class A1).

Certificate Issued 02 November 2015

Historic England Ref

Certificate of Immunity from listing issued by Historic England in respect of the Black Lion Public House, 123 Bayswater Road.

Certificate issued February 2015

09/05824/FULL

Development of Nos. 117 - 118 Bayswater Road for a mix of ground floor retail (Class A1) and 10 residential units (Class C3) on five floors above ground level plus basement parking for residential use.

Application Permitted 20 October 2009

08/04631/FULL

Redevelopment of Nos. 117-121 Bayswater Road for a mix of residential, hotel, retail and restaurant use and retention of facade and party walls of No. 122 and rebuild to provide three flats.

Application Permitted 19 November 2008

05/08673/FULL

Erection of new building comprising a retail (Class A1) unit at ground floor level, 13 residential units (3x1 bed, 6x2 bed and 4x3 bed) at first to fifth floor and 13 parking spaces for the residential units at basement level together with the build out of the pavement on the junction of Bayswater Road and the west side of Inverness Terrace.

Application Permitted 26 October 2006

07/07392/FULL

Redevelopment of Nos. 117-121 and conversion of No. 122 to provide a mix of residential, hotel, retail and restaurant uses.

Application Refused 13 December 2007

03/06054/FULL

Demolition of existing buildings (retention of facade at 122 Bayswater Road) to provide new building comprising basement, ground and five upper floors for use as apart-hotel, retail, restaurant and six residential units with associated car parking and servicing.

Application Refused 3 September 2004

7. THE PROPOSAL

Planning permission is sought for the demolition of all buildings within the site and the erection of a new building comprising 3 basements, ground and 9 upper storeys to provide a mixed use building of residential (55 flats), dentist, spa and flexible retail/car showroom and retail/restaurant uses.

8. DETAILED CONSIDERATIONS

8.1 Land Use

The overall proposed mixed use is generally acceptable, apart from the proposed car showroom, which has raised highways issues (see transport section). The applicant is also seeking a flexible use for retail and or car show room and retail and or restaurant use within the two ground floor/basement units.

Land use	Existing GEA	Proposed GEA	Difference GEA
Retail (A1)	771m2 (A1/A2)	0	-771m2
Retail (A1) and or car showroom (SG)	0	643m2	+643m2
Restaurant (A3)	511m2	0	-511m2

Restaurant (A3) and or Retail (A1)	0	572m2	+572m2
Dentist (D1)	127m2	220m2	+93m2
Spa (D2)	0	1835m2	+1835m2
Hotel (C1)	2150m2	0	-2150m2
Residential (C3)	841m2	13514m2	+12673m2
Total	1282m2	16784m2	+15502m2

NB/ Figures do not include Pub use as this has been replaced by a coffee shop, by virtue of a certificate of lawfulness.

Public House

The importance of Public Houses as community facilities providing vital social infrastructure to support residential communities is supported by planning policy as well as Strategic and National advice.

The former Black Lion Public House (Class A4) was closed in January 2015. At no time prior to or after its closure did the City Council receive an application nominating it as an Asset of Community Value (ACV). As such the applicant subsequently changed the use of the premises to a coffee shop under permitted development allowed under Class A of Part 3, Schedule 2 of the Town and Country Planning General Permitted Development (England) Order 2015. In response to consultation on this current planning application the only objection to the loss of the public house was received from the Campaign for Real Ale (CAMRA). No other parties or individuals have raised objection to its loss. The public house use has now been lawfully lost to a coffee shop.

A lack of nomination as an ACV or objection to its loss as part of this proposal would suggest that the Black Lion Public House was not considered as an important social and community resource by the local community, although it is acknowledged that there are other public houses in the vicinity of the site that may meet the needs of the community.

For all of the reasons set out above, the loss of the public house use which has already occurred was both lawful and acceptable in land use terms in this particular case.

Dentist

The existing small (127m2) dentist facility (Class D1) within the site at 6 Queensway is proposed to be replaced with a larger facility (220m2) at ground, first and part second floor level within the development with customer access from Queensway. This is both welcome and acceptable in accordance with policy SOC1 and SOC4 of our Unitary Development Plan (UDP) and S34 of our Westminster's City Plan: Strategic Policies (City Plan).

Other Non-residential Institutional uses within the same use class as a Dentist (Class D1) (clinics, health centres, crèches, day nurseries, museums, exhibition hall, trainings centre, places of worship) are likely to have a very different impact in amenity, environmental and transportation terms. A condition is considered appropriate to restrict the use to a dentist only and no other use within Class D1. This will give the City Council control over any future change of use of the premises and enable a full assessment of the potential impact.

Retail/Car Showroom

The introduction of a car showroom (Sui Generis use) as a flexible use (with Retail A1) within the site along Bayswater Road could result in a loss of Retail Class A1 floor space from the site. However the City Council's Highways Planning Manager has raised significant concerns with regard to the potential impact of the use (movement of display cars to and from the highway) on the surrounding highway network and to other highways users and traffic flows. In light of this concern the applicant has indicated their willingness not to pursue this flexible use if required. As such, it is considered that the car showroom use should be omitted from the proposal on highways grounds.

The omission of the car showroom use would also ensure that the 643m² unit within the centre of the site would be retained for Retail A1 use. Whilst this would still result in a reduction in 128m² of retail floor space from the site, given the improvement in the quality of floor space offered, this small loss is considered to be acceptable in light of the aims of District Shopping Centre policies SS6 and SS10 of our UDP and S21 of our City Plan.

It is recommended that this retail use is restricted to non-food retail uses due to the concerns raised by the City Council's Highways Planning Manager with respect to the intensive servicing needs of food retail uses. (Refer to the transport section of this report). Whilst comments have been made by some residents that the proposed shops will be occupied by brand chains of no use to local residents, this is not a valid planning consideration in this instance.

Restaurant/Retail use

A flexible Restaurant (Class A3) and Retail (Class A1) use is proposed for the ground and basement unit on the corner of Bayswater Road and Queensway. If used for restaurant use the proposal would result in a small increase (61m²) in restaurant floor space within the Queensway/Bayswater Road Stress Area. However given the overall improvements to the quality of the shopping spaces offered the small increase in restaurant floor space does not raise concern. With respect to this being a large (572m²) restaurant unit within the stress area, it is considered that the proposal, with the aid of an operational management plan (to control its operation and minimise the potential impact of the premises on local residents and local environmental quality), would result in an improvement over the existing effects that the existing uses have upon amenity and environmental quality and would provide for exceptional circumstances under policy TACE10 of our UDP and S24 of our City Plan, in which to allow a large restaurant use.

Spa

A large 1835m² spa facility (Class D2) to serve visiting members of the public, is proposed across the entire second basement level and a small area at third basement level, accessed independently from a reception/entrance at ground floor level on Bayswater Road. The spa would include facilities such as a pool, gym and personal fitness, steam, sauna, jacuzzi and treatment rooms. This is considered to be an appropriate and compatible use for this location and would add to the variety of facilities and services offered in the locality. Subject to an operational management plan which will also address its hours of use etc. and details of necessary plant etc. such a use should not adversely affect amenity of residents or environmental quality.

Other Assembly and Leisure uses within the same use class as a spa (Class D2) (cinema, concert hall, dance hall, skating rink, gymnasium etc.) are likely to have a very different impact in amenity, environmental and transportation terms. A condition is considered

appropriate to restrict the use to a spa only and no other use within Class D2. This will enable the City Council to fully assess and control any future change of use of the premises.

Overall the commercial uses proposed can be adequately controlled by conditions in relation to their use, with operational and servicing management plans, restrictions on hours of use and times of servicing and use of plant, control of the nature of the use and in the case of the restaurant, kitchen extraction, size of ancillary bar, restriction on take-away and deliveries.

Hotel

The existing hotel floor space (Class C1) provided by the Bayswater Hotel is of intensive use, providing low quality and low cost hotel accommodation which attracts a transient customer profile and which has impacted upon the appearance of this important frontage. For these reasons it is not considered that the use has benefited the local community or residential amenity in what is an area acknowledged as having an over concentration of hotels. As such the loss of hotel floor space from the site and replacement with a residential led development is both encouraged and welcomed in accordance with policy TACE1 of our UDP and S23 of our City Plan.

Residential use

The provision of 12673m² of additional residential floor space on site is both welcomed and encouraged under policy H3 of our UDP and S14 of our City Plan and will help the City Council to achieve its borough housing target set out in the London Plan. A total of 55 units of accommodation are proposed comprising the following unit sizes:-

Unit size	No. of units	%	Average size of unit GIA	National minimum standard
1 bedroom	9	16%	79m ²	37-50m ²
2 bedroom	23	42%	125m ²	61-79m ²
3 bedroom	12	22%	196m ²	74-108m ²
4 bedroom	9	16%	276m ²	90-130m ²
Duplex 4/5 bedroom	2	2%	408m ²	90-134m ²
	55	100%		

A total of 23 (40%) of the units are proposed as family sized (3 bedroom or more) in accordance with policy H5 of our UDP and S15 of our City Plan. The size of the proposed units range from 79m² for a 1 bedroom unit to 408m² for a 4-5 duplex unit. (A full breakdown of room sizes is provided as a background paper) Whilst the size of the units exceed the Technical housing standards- nationally described space standards (DCLG March 2015), the size of the units are considered to be comparable to other new units in the locality. Any increase in the number of units in order to maximise the number of proposed units on site, would need to consider the knock on effect on the quality of the units provided in terms of aspect, as most of the one and two bedroom units currently proposed are single aspect, due to the footprint of the site. Furthermore, an increase in residential units would also have implications for car parking, cycle storage and waste and recycling. As such it is considered that both the number of units proposed and mix of unit sizes is appropriate in this instance and the Mayors concerns regarding optimising the

number of residential units are not justified. Whilst concern has been raised by some residents that the residential units will be sold to absentee landlords, this is difficult to control under planning legislation.

Play space

Given the number of private residential units and number of family homes (less than 25) there is no requirement to provide play or open space under policies H10 and SOC6 of our UDP.

Affordable housing

No affordable housing is proposed on site. The applicant was seeking to acquire a site in Edgware Road (382) with a view to potentially providing nine affordable housing units, however this has not come forward as a firm proposition, which is disappointing. As such the applicant is proposing a payment of *up to* £8.5m in lieu of on-site affordable housing (see planning obligations section for breakdown of contributions). Whilst a policy compliant payment would be £24m (increased to £25.6m on 1st April 2016), an independent assessment by Gerald Eve, of the applicant's viability report, on behalf of the City Council, advises that it is not viable to provide on-site affordable housing and that the offer of £8.5m as a payment in lieu of affordable housing is the maximum reasonable amount the scheme can viably afford when taking into account community infrastructure levy and £100,000 for Public Art and a Tom Harris memorial. Whilst regrettable, given the independent advice on viability, it is considered that the scheme meets policy H4 of the UDP and S16 of our City Plan. The applicant has suggested that £900,000 of this £8.5m contribution should be diverted from the affordable housing fund towards funding streetscape improvements, leaving the remaining £7.6m for affordable housing (see section 8.10). Officers consider that the full available £8.5m should be directed to the City Councils affordable housing fund.

8.2 Townscape and Design

Introduction

The site comprises a group of unlisted buildings and a vacant building plot on the north side of Bayswater Road. The site is bounded by Queensway to the west and Inverness Terrace to the west. Part of the site is also within Fosbury Mews on the north side of the site. The entire site lies within the Queensway Conservation Area, with the Bayswater Conservation Area lying immediately to the east and north; and the Royal Parks Conservation Area lying to the south. The nearest listed buildings are the grade II listed Victorian terraces on Inverness Terrace. Kensington Gardens, on the opposite side of Bayswater Road, which forms part of the Royal Parks Conservation Area, is listed as a grade I park on the Register of Historic Parks and Gardens.

The proposal constitutes a significant intervention to the townscape and to various heritage assets. In the context of the current proposals, the heritage and townscape issues that arise include the impact on the character and appearance of the Queensway Conservation Area; and the impact on the setting of nearby heritage assets.

Legislation / Policy

In considering whether to grant planning permission for development which affects a listed building or its setting, Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 requires the local planning authority to have "special regard to the desirability of

preserving the building or its setting or any features of architectural or historic interest which it possesses”.

With regard to the impact of development in conservation area terms, Section 72 of the same Act indicates that “In the exercise, with respect to any buildings or other land in a conservation area . . . special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”.

Chapter 12 of the National Planning Policy Framework (NPPF) requires great weight to be given to a heritage asset's conservation when considering the impact of a proposed development on its significance; the more important the asset, the greater the weight should be given to its conservation. Paragraphs 133 and 134 specifically address the issues of harm to designated heritage assets; Paragraph 133 states where a proposed development will lead to substantial harm or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the harm is necessary to achieve substantial public benefits, whilst Paragraph 134 states that where a proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal. The public benefits would have to be of a magnitude that would outweigh the substantial weight that has been given to the protection of the significance of the heritage asset. In the case of this application, the designated heritage assets comprise of the Queensway Conservation Area and the listed buildings, registered park and other conservation areas in the immediate setting.

The City Council's City Plan strategic policies S25 and S28 recognise the importance of Westminster's historic townscape and the need to conserve it and require exemplary standards of sustainable and inclusive urban design and architecture.

Policy DES 1 of our UDP set out principles of urban design and conservation to ensure the highest quality in the form and quality of new developments in order to preserve or enhance the townscape of Westminster.

DES 4 of the UDP sets out criteria to ensure the highest quality of new development in order to preserve or enhance Westminster's townscape. The policy sets out considerations whereby new infill developments must have due regard to the prevailing character and quality of the surrounding townscape, particularly in conservation areas and conforms to or reflects urban design characteristics such as building lines, storey heights, massing, roof profiles and silhouettes of adjoining buildings, distinctive forms or architectural detailing prevalent in the local area, existence of set piece or significant building groups.

Policy DES 9 of the UDP aims to preserve or enhance the character and appearance of conservation areas and their settings and indicates that development proposals should recognise the special character or appearance of the conservation area. It indicates that buildings identified as of local architectural, historical or topographical interest in adopted conservation area audits will enjoy a general presumption against demolition.

Policy DES 10 of the UDP seeks to ensure that planning permission is not granted for proposals which have an adverse impact on the setting of listed buildings.

Policy DES 12 of the UDP seeks to preserve or enhance the appearance and integrity of open spaces and their settings. It requires development adjacent to open spaces to protect views into and out of these spaces, and to not project above existing tree or building lines.

Finally, ENV 14 of the UDP seeks to protect Metropolitan Open Land (which would include Kensington Gardens and Hyde Park). The policy seeks to protect and enhance their settings, including views from them.

The Existing Buildings within the Application Site

The application site is made up of the following components:

The vacant plot of 117-118 Bayswater Road is identified as a negative feature of the area within the Queensway Conservation Area Audit. The site has been vacant since the 1980s and is currently enclosed by hoardings and exposes the blank flank walls of neighbouring buildings.

Nos.119-121 Bayswater Road is a group of four Victorian terraced properties that have been converted into a hotel. They are four storeys high and the upper floors are set back from the street, but the ground floor retail areas extend forward to the back edge of the pavement. These buildings are identified as neutral buildings within the conservation area audit and their demolition has previously been accepted as part of an acceptable replacement development scheme.

No.122 Bayswater Road is a five storey building and like nos.119-121, the upper floors are set back from the ground floor retail unit. The upper floors are in red brick with stone dressings, with a stepped gable to the top storey. The building dates from the late nineteenth century. While the ground floor retail unit and the replacement windows detract from its appearance, the building exhibits a high level of craftsmanship and materials and is identified as an unlisted building of merit within the conservation area audit.

No.123 Bayswater Road is the former Black Lion Public House, which has regrettably had much of its pub interior stripped out and is now a café, although does not appear to be trading at present. This is a three storey building, which retains its ground floor pub shop front. The upper levels are in a stock brick with decorative window surrounds, cornice and parapet. The building dates from the 1860s, although the site of a pub on or close to this site can be traced back to the early/mid-eighteenth century. The building was recently considered for listing by Historic England, who concluded that it did not fulfil the criteria for listing, but also noted that it is not without interest and while there are some attractive features, "these are of local rather than national note." The building is identified as an unlisted building of merit within the Queensway Conservation Area Audit.

No.125 Bayswater Road occupies the corner site at the junction with Queensway. It is a 6 storey red brick building with stone dressings and is in an Arts and Crafts style dating from the late nineteenth century. The ground floor retail unit, in particular, but also the dormer roof extension detract from the appearance of the building, but it remains an attractive corner property and is also identified as an unlisted building of merit within the conservation area audit.

No.4 Queensway is a small three storey mid-Victorian building. It is stucco rendered to the upper floors with UPVC windows and a modern ground floor shop front. It is described by the conservation area audit as a neutral building.

No.6 Queensway is a single storey element that forms the southern end of Consort House. This is a red brick residential building with ground floor retail units, which was built

1968-72 by Owen Luder & Partners. Consort House is identified as a negative building within the conservation area audit. This assessment is based principally because the tower is out of scale with the southern end of Queensway, with views of it from the Royal Parks and because its horizontality at street level fails to respect the smaller plot widths of the nearby terraces.

Finally, no.7 Fosbury Mews is the one modern mews building within Fosbury Mews, which is otherwise, a discreet enclave of Victorian two storey mews houses, accessed from Inverness Terrace. All of the buildings within the mews are identified as unlisted buildings of merit within the conservation area audit.

The Significance of the Queensway Conservation Area and nearby Designated Heritage Assets

The Queensway Conservation Area is a linear area which predominantly comprises the frontage buildings onto Queensway. There is a mixture of building types, styles and ages, but the majority of the buildings date from the second half of the nineteenth century through to the first half of the twentieth century. The earlier buildings tend to be the Victorian terraced properties typically of 3 and 4 storeys height, which survives along long sections of the eastern side of Queensway and some, survive within the application site (nos. 119-121 Bayswater Road). The twentieth century buildings tend to occupy larger plots and for the most part are residential mansion blocks. The conservation area audit also identifies a small number of landmark buildings, which includes the listed Whiteley's shopping centre, the Porchester Centre and Hall (also listed), the former Queens Cinema and finally no.129 Bayswater Road the Hyde Park Hilton Hotel, which occupies the opposite corner to the application site at the southern end of Queensway. This building dates from the first decade of the twentieth century and is an attractive brick and terracotta building with a playful roofscape of domes, cupolas and gables. The buildings within the application site are all considered to reflect the somewhat eclectic character and appearance of the area. Their narrow plot widths reflect the earlier grain of development within the area and their design and materials are all elements which can be found elsewhere in the conservation area. This is not a view shared by the applicants who regard the buildings as having less coherence than other groups of buildings within the area.

The application site is described by the applicants as dilapidated and this is acknowledged. There is evidence of under investment, the appearance of the ground floor retail, with the exception of the former Black Lion Public House, is poor and the vacant site at the junction with Inverness Terrace, with a timber hoarding around it, and has been a blight to the area for too long.

In terms of the significance of nearby designated heritage assets, the Victorian terraced properties in Inverness Terrace, which also lie within the Bayswater Conservation Area are the nearest listed buildings to the application site. The majority of these buildings date from the mid-nineteenth century and are typically 5 and 6 storey properties (plus lower ground floors), stuccoed, with classical detailing. One of the principal components which contribute to their intrinsic significance but also to the significance of the area is their uniformity and order. The one slight exception to these buildings is 1-3 Inverness Terrace (now the Grand Royale Hotel) which was built in the late nineteenth century and is faced in stone, with more elaborate decoration to the facade. Despite its differences it still

complements the adjacent stucco terraces and general scale, character and appearance of the conservation area. Porchester Gate, which lies at the southern end of the listed terrace on the east side of Inverness Terrace crashes into this historic townscape and is considered to have an adverse impact on the setting of these listed buildings and upon the character and appearance of the conservation area. Similarly to the south of 1-3 Inverness Terrace, the townscape breaks down, with the buildings at 1B, 1C and 1 D Inverness Terrace and the vacant site within the application site, all diminishing the setting of the listed buildings and the character and appearance of the area.

Kensington Gardens in the Royal Parks Conservation Area are the other main nearby designated heritage assets. Kensington Gardens and Hyde Park as they appear today is largely a product of the mid-18th to 19th century in the form of a picturesque landscape. As stated in the application documents these parks can be regarded as the 'lungs and playgrounds' of central London. While the parks are bounded by busy roads with buildings fronting onto them, there are many locations within the parks (particularly when the trees are in leaf) where the picturesque qualities of the park shine through and the perception of *rus in urbe* occurs. The buildings which face onto Bayswater Road are of varied design and scale and in some cases, such as with the application site, the buildings lie below the tree line and in their unassertive scale, reinforce the picturesque qualities of the park.

The Proposal

The proposal is to demolish all of the buildings on the site and provide a new building comprising 3 basement levels, ground plus 9 upper floors providing 55 residential flats, with a retail character at ground floor level.

The new building has a defined base, middle and top, which is most clearly expressed on the main south-facing façade and the return elevations onto Queensway and Inverness Terrace. The base comprises the ground floor retail areas and the first floor defined by a wavy projecting canopy, with window band above; the middle section essentially comprises the 2nd -6th floors, which are terminated by a strong horizontal cornice line and above this the top is comprised of three storeys which are progressively recessive and contained within a curved form. Vertical emphasis is provided by subdividing the façade into bays with terminating curved corners. The two corners are slightly different, responding to the geometry of the site. The return facades onto Queensway and Inverness Terrace follow the same architectural approach as the main south façade. The rear faced has a more toned down design with less articulation and depth, although the common principles of the façade composition are maintained. The overall expression of the building in views from the south and along Bayswater Road is of a curvilinear nature.

The main facing materials include natural stone for the curved panels to the middle section of the façade, set within a reconstituted stone grid, with the curved balcony elements formed of reconstituted stone as well. The base section of ground and first floors including the prominent wavy canopy will be in bronze-coloured metal (assumed to be aluminium), while the curved roof is to be a light grey / champagne-coloured metal (again assumed to be aluminium). Window frames are generally in a dark grey powder-coated aluminium, with the exception of the top floors where a lighter grey is used to complement the roofing material. Both metal and glass balustrades are proposed for balconies, with the use of metal prevalent in the lower floors, with glass used for the corners and upper floors. The use of natural stone is not carried round onto the rear façade, where instead there is a greater use of reconstituted stone and bronzed-coloured metal cladding.

The ground floor building line is pulled back by between 1 and 1.5m to provide greater pavement width, however, the massing to the upper floors extends beyond this ground floor line and thus differs from the current situation, where the upper floors are set well back from the ground floor retail units.

The ground floor shop fronts will comprise large glazed openings with no subdivision, an initial shop front strategy has been submitted which relates to signage locations. Public art is proposed and it is anticipated to be located within the shared outdoor space of the residential drop-off area in Inverness Terrace.

Assessment of Impacts

The demolition of all of the existing buildings, in particular nos.122-125 Bayswater Road, on the site is considered to have a harmful impact upon the character and appearance of the Queensway Conservation Area. This is a view shared by the Greater London Authority, the Victorian Society, Historic England and many of the objections raised by local residents.

Nos. 122-125 are all unlisted buildings of merit which make a positive contribution to the character and appearance of the Queensway Conservation Area and also act as the eastern side of the 'townscape gateway' into Queensway from the south. Their loss would significantly erode architectural, historic and aesthetic characteristics of the conservation area. No meaningful attempt has been made to integrate these buildings into a redevelopment scheme.

With respect to the replacement building, while, in isolation of context, it is attractive and eye-catching, when placed in its townscape context is considered to be far too large and assertive. As a consequence its height and massing are considered to have a harmful impact on the Queensway Conservation Area, and upon the setting of the listed buildings in Inverness Terrace, the Bayswater Conservation Area and the Royal Parks Conservation Area. This is a view shared by the Royal Parks Agency, the Victorian Society, Historic England and many of the objections raised by local residents.

The height of the new building at 62.15m AOD is comparable in height to Porchester Gate to the east (62m AOD) and Consort House to the north (61.8m AOD). The Queensway Conservation Area Audit identifies Consort House as having a negative impact on the area due in part to its scale; and any visual assessment point of Porchester Gate, whether from the Royal Parks, from along Bayswater Road or from Inverness Terrace, reveals a building which is oppressively out of scale and harmful to its surrounding townscape. Thus to introduce a scale of building which matches these two buildings will only add to the harmful massing and adversely affect the surrounding area. In addition to the concerns over the development in simple height terms, the proposed new building is brought forward of the existing building line (above the ground floor shops) and thus will step forward of the building line of Porchester Gate to the east and the Hyde Park Hilton Hotel to the west and as a consequence its scale and massing will be assertive and overwhelming in views from along Bayswater Road. In views from the north, along Queensway and Inverness Terrace, and especially from within Fosbury Mews, the new building will introduce a cliff face, relatively unarticulated, which in no way complements the character and appearance of the conservation area or the setting of the listed buildings in Inverness Terrace.

In terms of more detailed design comments, the over sailing of the ground and first floor and the creation of a canopy over the street is oppressive and while the widening of the street is welcome, this comes at a price. The ground floor shop fronts are highly glazed with limited framing and intricacy of detailing and as a consequence the building somewhat uncomfortably floats above this lightweight base, and also exhibits a lack of craft and quality at pedestrian level. The combination of glazed and metal balconies is also regarded as somewhat unresolved as a detail. These and other more minor detailed design issues are of secondary concern to the in principle issues that result in harm – namely the loss of the historic buildings and their replacement with a building which is far too large.

These two concerns are considered to cumulatively result in substantial harm to the Queensway Conservation Area and less than substantial harm to the setting of other designated heritage assets. Where substantial harm occurs, the NPPF advises that local authorities should refuse consent unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm, or all of the criteria set out in paragraph 133 are met. In this case the public benefits identified by the applicant are as follows:

- Enhances the setting of Kensington Gardens and the Royal Parks Conservation Area, the Bayswater Conservation Area, the nearby listed buildings and the nearby unlisted buildings of merit. Enhances the character and appearance of the Queensway Conservation Area;
- The scheme resolves a site previously suffering from fragmented ownership and under investment. A coherent redevelopment providing new and better residential, leisure facilities accessible to the public and an improved retail frontage;
- A financial contribution to streetscape improvements for Queensway;
- Proposal will be a catalyst for transformational local change;
- A contribution will be made towards affordable housing.

It is contended that the proposed benefits are not substantial (some being no more than attempting to be policy compliant), do not necessitate the harm caused, nor do they outweigh the harm caused.

Where less than substantial harm occurs, paragraph 134 of the NPPF advises that this harm should be weighed against the public benefits of the proposal, including securing the asset's optimum viable use. Again, and mindful of the statutory duty, it is considered that the public benefits do not outweigh the harm caused.

For these reasons the proposal is considered to be unacceptable in design terms and to be contrary to S25 and S28 of our City Plan; DES 1, DES 4, DES 9, DES 10, DES 12 and ENV 14 of our UDP.

Overall the limited package of benefits put forward by the applicant has not justified the loss of the existing buildings as required by the NPPF and officers therefore cannot support the application in its current form, a view supported by the Greater London Authority. As such the officer's recommendation sets out a number of suggested amendments to the proposal that could go some way to mitigating the acknowledged harm and also seeks a significant increase in public benefits in light of the NPPF requirements.

8.3 Residential Amenity

Consort House

This residential block is located directly north of the site (behind 123-125 Bayswater Road and adjacent to 6 Queensway). It comprises of 5 storeys closest to the application site rising to an 11 storey tower. The flank of the 5 storey element of the block is generally brickwork to its southern facade (apart from a vertical slot window) with windows to its east and west facades. The tower element which lies around 35m north has a number of windows and balconies facing south.

Within Consort House 28 windows will see a significant reduction in daylight and 4 will see significant reductions in sunlight. In terms of enclosure and privacy limited information has been submitted with respect to the relationship of the proposed building and the 5-storey part of Consort House. As such the impact of the proposed development on this residential block is considered to require further review and revision to minimise the potential impact on the amenities of the occupiers of this building. This should take into account the objections made by occupiers of this neighbouring building.

Whilst the occupiers of the tower have raised objection to significant changes to their south facing outlook, as the proposed development is likely to block their view towards Kensington Gardens, this is not a valid reason to withhold permission. The development would lie some 35m south of this residential block and therefore would not result in any significant sense of enclosure.

Porchester Gate, Bayswater Road.

This is a large residential block located to the east of the application site on Bayswater Road at its junction with Inverness Terrace. The building contains a number of windows to its western flank which face the eastern elevation of the proposed building. Given this relationship, 76 windows in this neighbouring building would see a reduction in daylight and 41 would see a reduction in sunlight.

In this particularly case, this neighbouring property has had the benefit of a vacant site directly west of it which has resulted in unusually high levels of daylight and sunlight to those eastern flank windows over the last 20-30 years. Given the extant permission for the application site for 6-storeys and due to the location of the affected windows (up to 7th floor level) and that a number of the rooms of the affected windows are also served by a number of other windows. It is not considered that the impact of the development on the amenities of this neighbouring building would be so great as to warrant withholding permission. In terms of sense of enclosure and privacy, the proposed development would lie some 14m west of Porchester Gate and given the street layout and distance this is considered acceptable in amenity terms. It is of note that no representations of objection have been received from Porchester Gate.

1-8 Fosbury Mews

These two storey mews houses are located directly north of the application site to rear 119-121 Bayswater Road and have east and west facing windows. No.7 Fosbury Mews has a "U" shape footprint at the head of the mews and forms part of the application site. Nos. 5 and 8 Fosbury Mews are owned by the applicant but remain in residential use. Therefore all properties within the mews, excluding No.7, are relevant for assessment in amenity terms.

No.1 Fosbury Mews would see a significant reduction in daylight to 1 window and significant loss of sunlight to 7 windows.

No.2 Fosbury Mews would see a significant reduction in daylight to 1 window and a significant loss of sunlight to 4 windows.

No.3 Fosbury Mews would see a significant reduction in daylight to 3 windows and a significant loss of sunlight to 3 windows.

No.4 Fosbury Mews would see a significant reduction in daylight to 1 window and a significant loss of sunlight to 6 windows

No.5 Fosbury Mews would see a significant reduction in daylight to 6 windows and significant loss of sunlight to 4 windows

No.6 would see a significant reduction in daylight to 1 window and significant loss of sunlight to 2 windows.

No.8 would see a significant reduction in daylight to 4 windows and a significant loss of sunlight to 5 windows.

Even taking into account the extant permission/s for parts of the application site, significant further losses of daylight and sunlight are resultant from this proposed development which comprises of a building which is higher and which projects further to the rear and incorporates 7 Fosbury Mews.

A further concern is the feeling that the development “looms” over the Mews and would create a sense of enclosure. Again, whilst it is accepted that permission for redevelopment of part of the application site has been granted in the past, this proposed development is of greater height and scale.

The ground floor elevation to Fosbury Mews also raises concern with respect to its appearance and activities associated with its use. A green wall is proposed at ground floor level to the head of the Mews and the return elevations are to house access doors to gas, water, an electrical sub-station and to provide a fire escape access. Whilst not involving day to day activities, but rather general maintenance and escape in an emergency (and presumably practice drills), this does raise concern over the impact of these type of activities and also their associated appearance on the domestic and small scale mews and its residents. As such the officer’s recommendation seeks alterations and revisions to the proposed development to seek to minimise its detrimental impact on the mews. It is also considered necessary to seek an operational management plan with respect to access to these utilities and fire escape strategy so as to minimise non-residential activities on the mews. This should take into account the significant objections received by a substantial number of residents living in the mews.

Inverness Terrace

Nos1b and 1c/d Inverness Terrace lie north of the site to the rear of 117-118 Bayswater Road (the vacant site). These properties already suffer from low levels of daylight and sunlight and the proposed development would see a further reduction in daylight and sunlight to all rear facing windows. Even taking into account the extant permission,

significant further losses are resultant from this proposed development. Whilst the applicant has carried out a further assessment considering the potential impact on these properties if they were to be redeveloped in accordance with extant permissions, this is not relevant in the absence of commencement of those developments which may never be implemented.

In terms of enclosure and privacy, limited information has been submitted with respect to the relationship of the proposed building with these properties and the location of some terraces raises concern.

As in the case of Consort House and Fosbury Mews the impact of the proposed development on these residential buildings is considered to require further review and revision to minimise the potential impact on the amenities of the occupiers of these buildings.

Queens Court, Queensway

This residential block is located at a sufficient distance (30m) north west of the application site on the opposite side of Queensway 911-27, so as not to be adversely affected in daylight terms. Given its orientation, 6 windows would see a reduction in sunlight, however the affected rooms (living/kitchen/dining) are also served by unaffected windows and overall the level on sunlight reaching these rooms is considered to remain satisfactory.

Summary of amenity impact

Overall the proposed development raises amenity concerns with respect to the impact of the development on daylight and sunlight, sense of enclosure, privacy and activity which require resolution. The officer's recommendation therefore recommends alterations to the height, bulk, proximity and detailed design of the rear elevation, to reduce the unacceptable impact of the building on the amenities of neighbouring residents in Fosbury Mews, Inverness Terrace and Consort House in accordance with ENV13 of the UDP and S29 of the City Plan.

8.4 Transportation/Parking

Pedestrian access

The pedestrian entrance to all uses is proposed via level access from ground floor level. The Dentist and the Retail and or Restaurant unit on the corner of Bayswater Road and Queensway are both accessed from Queensway. The retail unit and or car showroom and the spa facility are both accessed from Bayswater Road, with independent pedestrian entrance to the residential units from Inverness Terrace. The proposed widening of the pedestrian highway by between 1-1.5m around the building to Queensway, Bayswater and Inverness Terrace is welcomed.

Vehicular access

A new vehicular access is proposed on Inverness Terrace in the form of an off street drop/pick up area for residents. The Highways Planning Manager has indicated that there is no direct link between the proposed drop off and residential car parking provision and considers the drop off would result in unnecessary trips on the highway network and creates unnecessary conflict points for pedestrians. However, the Highways Planning Manager has not recommended refusal of the application on this ground and whilst regrettable is not considered a ground in which to justify withholding permission.

Servicing

An internal loading bay is proposed within the building at ground floor level; with access from the rear via Queensway through the Consort House under-croft (using the same access arrangement is used to access the Q Park public car park). Access to the loading bay is limited to white van type vehicles with larger vehicles (including refuse vehicles) only able to access as far as the access to the Q Park car park. The applicant has indicated that servicing will be managed through a servicing management plan, although no such plan has been provided at this stage, which is disappointing.

Given the potential detrimental impact of vehicles reversing from or into Queensway in highway and amenity terms, it is considered necessary and appropriate to require all servicing of the site (excluding collection of waste and recycling) to take place from within the development, which will ensure appropriate size vehicles enter and leave the site in a forward direction and noise and disturbance is minimised. A servicing management plan will also need to be sought through condition to require details of the servicing process for all of the units, storage locations, scheduling of deliveries and staffing arrangements including delivery vehicle size and any use of the highways by refuse vehicles. Given the size of the internal loading bay and the size of the two proposed units, the Highways Planning Manager has indicated that the loading bay is not sufficient for retail food use and as such a condition is necessary to prevent such a use.

The applicant is seeking a dual flexible use for either Retail Class A1 or Car showroom for the Bayswater Road unit, however no details have been provided as to how the delivery/exchange of display vehicles would be managed with regard to the impact on Bayswater Road (pedestrians and traffic flows). The City Council's Highways Planning Manager has raised significant concerns with regard to the potential impact of the use (movement of display cars to and from the highway) on the surrounding highway network and to other highways users and traffic flows, particular given the likely use of car transporter vehicles stopped on the highway. In light of this concern and in the absence of the applicant demonstrating that the car showroom could be serviced without adverse impact on highways uses; it is considered that the car showroom use should be omitted from the proposal on highways grounds. The applicant has indicated their willingness not to pursue this flexible use if required. As such it is recommended that the car show room use is omitted from the proposal.

Car parking

The applicant is seeking to provide 67 car parking spaces for the 55 residential units proposed, within the adjoining existing Q park public car park, located below Consort House, with a new pedestrian access from the application site. However little supporting information had been provided to justify the loss of public car parking or to show that the car parking could be satisfactorily provided, which raised concern with the City Council's Highways Planning Manager. The applicant has subsequently confirmed that a commercial agreement (long lease) has now been reached with Bourne Estate and with Westminster (which has an ownership interest) over the use of surplus car parking spaces with the Q Park basement carpark. On the basis that the provision of car parking within this area is achievable, this is considered acceptable, subject to full details of location of spaces, provision on an unallocated basis and with associated electrical vehicular charging points (at least 20% active and 20% passive) and blue badge car parking (the applicant has indicated that 10% of spaces will be made available for disabled use).

Whilst Transport for London consider the proposed level of car parking to be excessive in such an accessible location, the proposed level of car parking accords with TRANS23 of our UDP.

In accordance with planning policy, no off street car parking is provided in association with non-residential uses on site. The location of the site within a controlled parking location will prevent any significant impact on car parking in the locality.

Cycle parking

A total of 102 cycle parking spaces are proposed within the basement (level 3) for use by the residential occupiers of the development which accords with requirements of the London Plan. Only 12 cycle parking spaces are proposed within the basement (level 1) in association with the non-residential uses within the development, but with provision for 56 cycle spaces on street. Increased provision (to a minimum of 64 spaces) along with satisfactory access for staff including that of the spa use would be required by condition.

Transport for London has requested that the proposal should secure funding for cycle hire membership (cycle docking) for each residential unit for a minimum of one year. However given the on-site cycle provision and viability of the scheme, this request has not been pursued.

Refuse and recycling

A refuse storage room associated with the residential use is proposed at basement level 3 and for the commercial uses at basement level 1. A temporary presentation point is proposed to the top of the rear access road adjacent to the entrance car park. The provision is acceptable to the Cleansing Manager, subject to an operational servicing plan.

Travel Plan

Notwithstanding Transport for London's request, given the location of the site and the nature and mix of proposed uses, a travel plan is not considered necessary.

Other highways matters

Subject to the omission of the car showroom use, overall the proposal is generally considered acceptable in transportation terms subject to a number of detailed conditions and planning obligations. The cost of all highways works immediately surrounding the site required for the development to occur including changes to on-street restrictions and reinstatement and creation of new vehicular crossovers would need to be secured via a S106 legal agreement.

Works to the highway will require highways Authority approval. The development also indicates dedication of highway resultant from footway widening around the building to Queensway, Bayswater Road and Inverness Terrace, which must occur prior to occupation of the development and at the applicants cost.

Transport for London has requested that a financial contribution of £15,000 be provided towards the upgrading of the Bus Stop located outside of the site on Bayswater Road. This is not currently offered by the applicant,

Construction management

A scheme of this scale and nature would require a construction management plan to minimise the impact of construction and a financial contribution to the City Council's Environmental Inspectorate to monitor compliance with the construction Environmental Management Plan. In addition a Constructions and Logistics Plan and Delivery and Servicing Plan as requested by Transport for London would need to be secured.

8.5 Economic Considerations

The application is subject to a viability report which has been independently assessed, and the economic considerations are referred to throughout this report.

8.6 Access

Accessibility considerations are set out throughout the report and specifically within the land use and transportation sections of this report

8.7 Other UDP/Westminster Policy Considerations

Noise & vibration

Given the location of the London Underground tunnels (Central Line) it is considered that due regard must be had to the potential for noise and vibration to affect the proposed residential accommodation.

Plant is proposed to be located within the basement, ground and at ninth floor level including a combined heat and power plant and various other plant at basement level 3, a transformer at basement level 1, ground floor electrical sub-station and condenser units at 9th floor level.

A response on these matters from Environmental Health is awaited and any response will be reported verbally. Further details are likely to be required by condition to prevent noise and disturbance to existing and future residents in order to ensure compliance with Policy ENV6 and ENV7 of our UDP and Policy S32 of our City Plan

Trees and hard and soft landscaping

There are no trees on or close to the site. The proposed soft landscaping strategy is to create two pedestrian level green walls and a small landscaped area to the drop off area on Inverness Terrace. One green wall on the existing boundary wall to the rear of 4-8 Fosbury Mews which would face the access road and a further green wall is proposed to part of the rear elevation of 7 Fosbury Mews at the head of the mews. A small soft landscaped area is also proposed within the residential drop off area on Inverness Terrace. However limited details have been provided. Full bespoke details of the green walls including irrigation and maintenance will need to be required to ensure their chance of success. Full details are also required for the soft landscaping area to Inverness Terrace to secure planting of a tree and suitable shrubs. Furthermore, the City Council's arboricultural manager has requested that a financial contribution be sought for street tree planting in the vicinity of the site to improve biodiversity and visual amenity in the area, a request also made by the South East Bayswater Residents Association (SEBRA). However the applicant is not currently offering this.

The pavement is proposed to be re-landscaped to Bayswater Road and part of Queensway and Inverness Terrace. New hard landscaping/paving is proposed to the access road to the rear of the site together with new stone paving to a small area of Fosbury Mews outside of No.7 Fosbury Mews.

Whilst the improvement to paving and introduction of some minimal soft landscaping is welcomed, it is regrettable that further greening (at roof and street level) is not proposed.

Sustainability

The proposed development is expected to achieve carbon emissions savings of 38%. The design of the façade, fabric and glazing and material is designed to minimise overheating. A Combined Heat and Power (CHP) plant is proposed in the basement for the entire development with a condensing gas boiler back up, to provide heating and electricity. The strategy also includes the potential for future connection to a district heating network. No renewable energy is proposed due to visual impact and air quality constraints. Overall the scheme is considered to be acceptable in sustainability terms and in general compliance with the London Plan and our City Plan policy S39 and S28.

Archaeology

Whilst outside of a priority area, Historic England (Archaeology) has advised that there is potential for remains within the site due to the proximity of a Roman Road which is thought to have followed Bayswater Road. This could be addressed by conditions.

8.8 London Plan

The proposal is preferable to the Mayor of London under category 1c (a building of over 30m in height) and a stage 1 response has been received. The Mayor considers that the application does not comply with the London Plan and is of the opinion that the benefits of the development do not outweigh the loss of non-designated heritage assets and the substantial harm caused to the Conservation Area and the development proposal are contrary to London Plan policy. The Mayor is also of the opinion that the design of the replacement building would also be harmful to the Conservation Area.

If the City Council resolves to make a draft decision on the application, it must consult the Mayor again (stage 2) and allow 14 days for his decision as to whether to direct refusal, take it over for his own decision or allow the City Council to determine it itself.

The proposed development is also liable for a Mayoral CiL payment.

8.9 National Policy/Guidance Considerations

The City Plan and UDP policies referred to in the consideration of this application are considered to be consistent with the NPPF unless stated otherwise.

8.10 Planning Obligations

Background

On 06 April 2010 the Community Infrastructure Levy (CIL) Regulations came into force which make it unlawful for a planning obligation to be taken into account as a reason for granting planning permission for a development, or any part of a development, whether there is a local CIL in operation or not, if the obligation does not meet all of the following three tests:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development;
- (c) fairly and reasonably related in scale and kind to the development.

Policy S33 of the City Plan relates to planning obligations. It states that the Council will require mitigation of the directly related impacts of the development; ensure the development complies with policy requirements within the development plan; and if appropriate, seek contributions for supporting infrastructure. Planning obligations and any Community Infrastructure Levy contributions will be sought at a level that ensures that the overall delivery of appropriate development is not compromised.

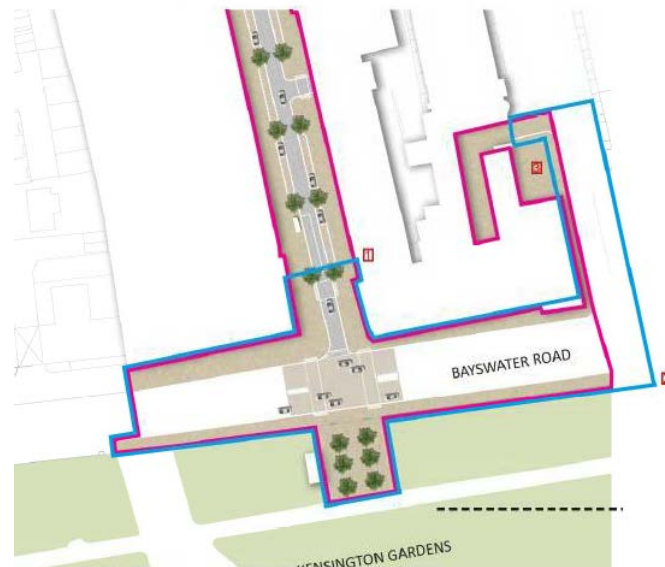
From 06 April 2015, the Community Infrastructure Levy Regulations (2010 as amended) impose restrictions on the use of planning obligations requiring the funding or provision of a type of infrastructure or a particular infrastructure project. Where five or more obligations relating to planning permissions granted by the City Council have been entered into since 06 April 2010 which provide for the funding or provision of the same infrastructure types or projects, it is unlawful to take further obligations for their funding or provision into account as a reason for granting planning permission. These restrictions do not apply to funding or provision of non-infrastructure items (such as affordable housing) or to requirements for developers to enter into agreements under section 278 of the Highways Act 1980 dealing with highway works. The recommendations and detailed considerations underpinning them in this report have taken these restrictions into account.

The City Council has consulted on the setting of its own Community Infrastructure Levy, which is likely to be introduced in May 2016. In the interim period, the City Council has issued interim guidance on how to ensure its policies continue to be implemented and undue delay to development avoided. This includes using the full range of statutory powers available to the council and working pro-actively with applicants to continue to secure infrastructure projects by other means, such as through incorporating infrastructure into the design of schemes and co-ordinating joint approaches with developers.

The Applicant's offer

The applicant is proposing the following:-

- 1) A financial contribution of £8.5m, split between:-
 - a. A contribution of £900,000 towards the cost of streetscape improvements works to Bayswater Road, Queensway and Inverness Terrace within the blue line area shown on the plan below.



- b. A financial contribution of £7.6m as a payment in lieu of Affordable Housing.
- 2) A financial contribution of £100,000 towards the provision of Public Art & a Tom Harris Memorial within the application site.
- 3) A financial contribution of £1.3m towards the provision of new pedestrian gates to Kensington Gardens and associated hard & soft landscaping, highway works to the junction of Bayswater/Queensway and potential relocation of public toilets in the area shown on the plan above.
- 4) A financial contribution (TBC) to the City Council's Environmental Inspectorate to monitor compliance with Construction Environmental Management Plan.

The applicant considers that together with the contributions set out above, that their proposal, which they consider can only be achieved by comprehensive redevelopment of the site, would bring about the following public benefits:

- Coherent development to resolve legacy of fragmented ownership of site and under investment.
- Enhancement of the setting of the Park and conservation areas
- Additional and improved residential accommodation
- New leisure facilities
- Improvement to quantity and quality of retail offer.

Consideration of the Applicant's offer

Public benefits can be considered as social, economic or environmental benefits (which are the three dimensions that underpin sustainable development), of a nature and scale to benefit the public at large.

It is acknowledged that a part of the site (117-118 Bayswater Road) has been long term vacant and it therefore follows that its development is welcomed. It is also acknowledged

that the site has until recently been in a number of different ownerships, which has resulted in a number of separate smaller planning permissions for 117-118 and 119-122 Bayswater Road as well as collectively 117-122 Bayswater Road.

The proposal as currently submitted is not considered to enhance the setting of the park or conservation area (see section 8.2). The single ownership of the site is welcomed, as is the increase in quantity and quality of residential accommodation and retail floor space within the shopping centre and the financial contribution towards affordable housing. However these are matters that are required by planning policy and would be expected from any development of the site.

The applicant is not offering a policy compliant affordable housing financial contribution of £24m (£25.6m as of 1st April), but only up to £8.5m, although it is accepted that this is the maximum viable amount the scheme can afford (as independently verified). However the applicant suggests that £900,000 is re-directed from the affordable housing funding streetscape improvements around the site, leaving £7.6m for affordable housing.

Furthermore, notwithstanding the viability of the scheme, the applicant has also offered a financial contribution of £1.3m towards the provision of new pedestrian gates to Kensington Gardens and associated hard & soft landscaping, highway works to the junction of Bayswater/Queensway and potential relocation of public toilets in the area shown on the plan above. Although it is of note that objections have been raised to such an intervention into the park by a number of parties including The Royal Parks themselves.

It is acknowledged that the applicant is now one of four major land owners of the shopping area and that they are in collaboration with the other land owners to see the City Council's Queensway and Westbourne Grove Streetscape Improvement project implemented. It is also acknowledged that the financial contributions offered to streetscape improvements will assist the City Council in achieving its aims to reinvigorate Queensway. However, it is not considered that the public benefits currently offered amount to substantial public benefits in this case a view supported by The Greater London Authority, Historic England and The Victorian Society.

Other issues

Other financial contributions requested by other parties, but not currently offered by the applicant include Transport for London's request for £15,000 towards the upgrading of the bus stop outside of the site on Bayswater Road and membership of cycle hire membership for residents for at least one year at £90 per unit, and a financial contribution towards tree planting in the vicinity of the site.

8.10 Environmental Impact Assessment

An Environmental Impact Assessment was not required for a development of this scale, see history section of this report. Other general environmental matters are covered elsewhere in this report.

8.11 Other Issues

Statement of Community Involvement

The applicant has submitted a Statement of Community Involvement (SCI), which sets out their engagement with the local community and interest parties over the last 16 months. This states that they have met and or held workshops with resident groups including the South East Bayswater Residents Association, local land owners, Historic England, The Royal Parks and The Greater London Authority and that they held a public exhibition over 11-12th June 2015 which was attended by over 100 people.

NB/ Given the nature of the recommendation, a draft decision letter is not included.

9. BACKGROUND PAPERS

1. Application form & Schedule of room sizes.
2. Response from Greater London Authority, dated 11 February 2016
3. Response from Historic England dated 29.01.2016
4. Response from Historic England-Archaeology dated 16.12.2015
5. Response from Royal Parks dated 16.02.2016
6. Response from Victorian Society dated 24.02.2016
7. Response from Transport for London dated 10.12.2015
8. Response from Environment Agency dated 08.12.2015
9. Response from Thames Water dated 23.12.2015
10. Response from Kensington and Chelsea dated 23.12.2015
11. Response from South East Bayswater Residents Association dated 31.03.2016 and 21.03.2016
12. Response from Head of Affordable and Private Sector Housing dated 09.03.2016
13. Response from Highways Planning Manager dated 26.02.2016
14. Response from Cleansing Manager dated 22.12.2015
15. Response from Arboricultural Manager dated 18.12.2015
16. Response from Designing Out Crime Officer dated 10.12.2015
17. Representation from CAMRA, dated 21.01.2016
18. Representation from Occupier of 1 Fosbury Mews dated 21.01.2016
19. Representation from Occupiers of 2 Fosbury Mews dated 20th, 23rd, 24th, 25th (x2) January 2016 and 14.03.2016.
20. Representation from Occupier of 3a Fosbury Mews dated 01.02.2016
21. Representation from Occupier of 4 Fosbury Mews dated 20.01.2016
22. Representation from Occupier of 6 Fosbury Mews dated 25.01.2016
23. Representation from Occupier of 8 Fosbury Mews dated 19.02.2016 (S)
24. Representation from Occupier of 4 Pyrland Road, Richmond dated 25.01.2016
25. Representation from Occupier of 28 Inverness Terrace dated 14.03.2016 (S)
26. Representation from company who are leaseholder of retail unit at 2 Queensway and 125 Bayswater Road dated 29.12.2015, 07.01.2016 (x2), 16.02.2016.
27. Representation from Occupier of 4 Consort House, 26 Queensway dated 07.01.2016.
28. Representation from Occupier of Flat 24 Consort House, Queensway dated 05.01.2016.
29. Representation from owner/ occupier of 17 Consort House, 26 Queensway dated 04.01.2016.
30. Representation from owner of Flat 25 Consort House, 52 Evangelistrias Nicosia dated 04.01.2016.
31. Representation from the occupier of Flat 33 Consort House dated 29.03.2016.
32. Representation from owner of 37 Consort House, Queensway dated 11.12.2015.

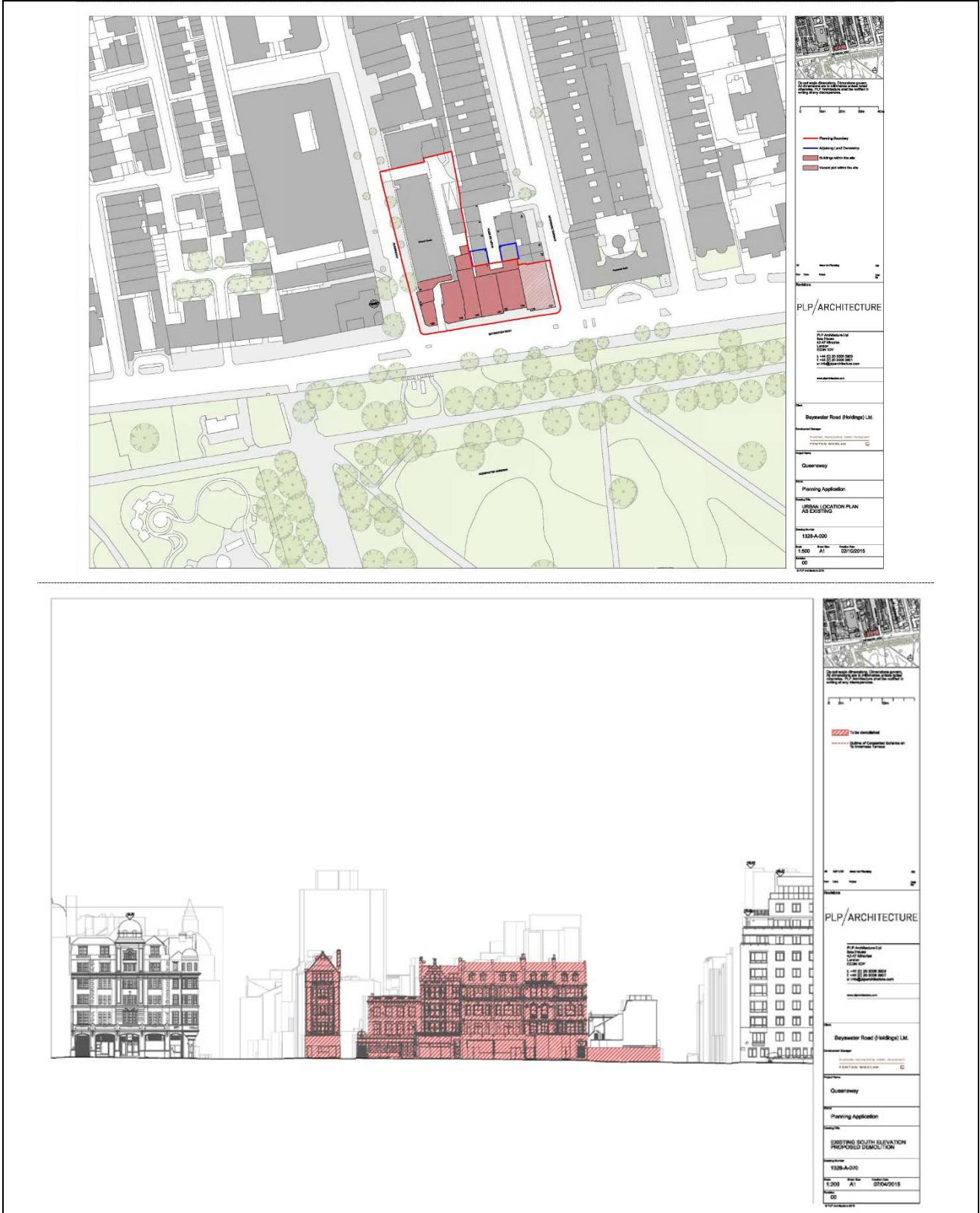
33. Representation from the Occupier of 42 Consort House, Queensway dated 16.02.2016.
34. Representation from the occupier of 62 Queensway dated 22.02.2016 (S)
35. Representation from the occupier of 22 Porchester Terrace dated 18.02.2016 (S)
36. Representation from the occupier of 21-23 Palace Gate dated 18.02.2016 (S)
37. Representation from the occupier of 116 Fifth Avenue dated 11.02.2016
38. Representation from Park Villas Residents Association, C/O 60 Westbourne Park Villas dated 08.02.2016
39. Representation from resident of Bayswater dated 11.02.2016
40. Representation from the occupier of 242 Aklam Road dated 14.03.2016 (S)
41. Representation from the occupier of 48 Westbourne Park Road dated 29.03.2016. (S)
42. Representation from the occupier of 98 Westbourne Terrace dated 29.03.2016
43. Representation from the occupier of 4 Caroline Place dated 29.03.2016.
44. Representation from the occupier of 5 Queens Court dated 29.03.2016.
45. Representation from the occupier of Bark Place dated 29.03.2016.
46. Representation from the owner of 1c/d Inverness Terrace dated 01.04.2016

Selected relevant drawings

(Please note: All the application drawings and other relevant documents and Background Papers are available to view on the Council's website)

IF YOU HAVE ANY QUERIES ABOUT THIS REPORT PLEASE CONTACT SARAH WHITNALL ON 020 7641 2929 OR BY EMAIL AT NorthPlanningTeam@westminster.gov.uk

10. KEY DRAWINGS



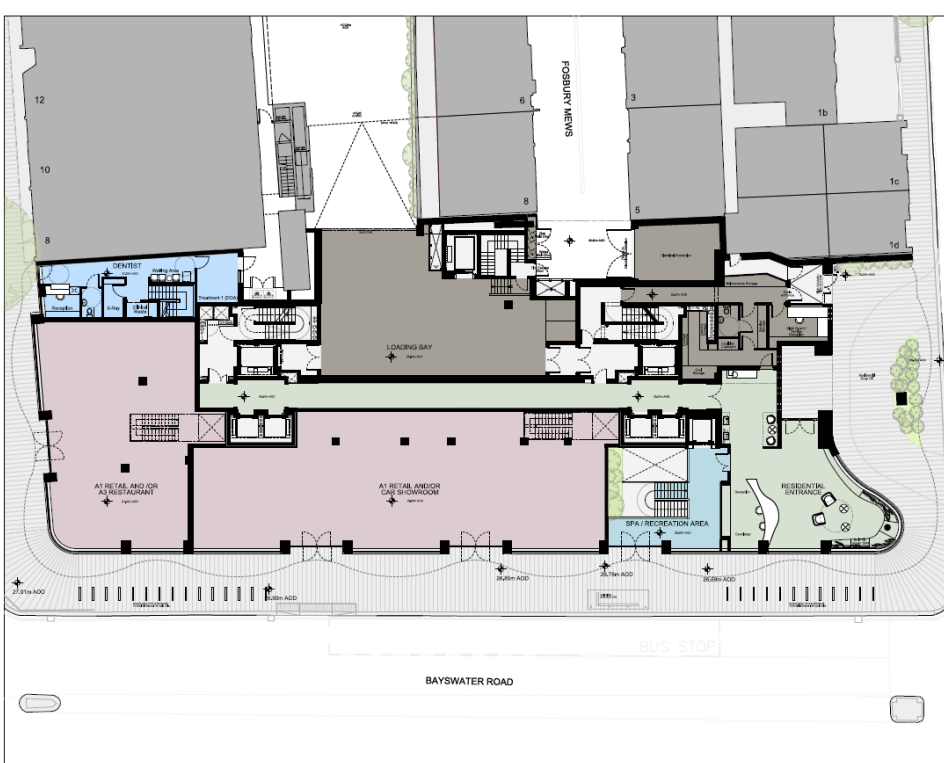


PLP/ARCHITECTURE

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PROPOSED GROUND FLOOR IN ASPIRATIONAL CONTEXT

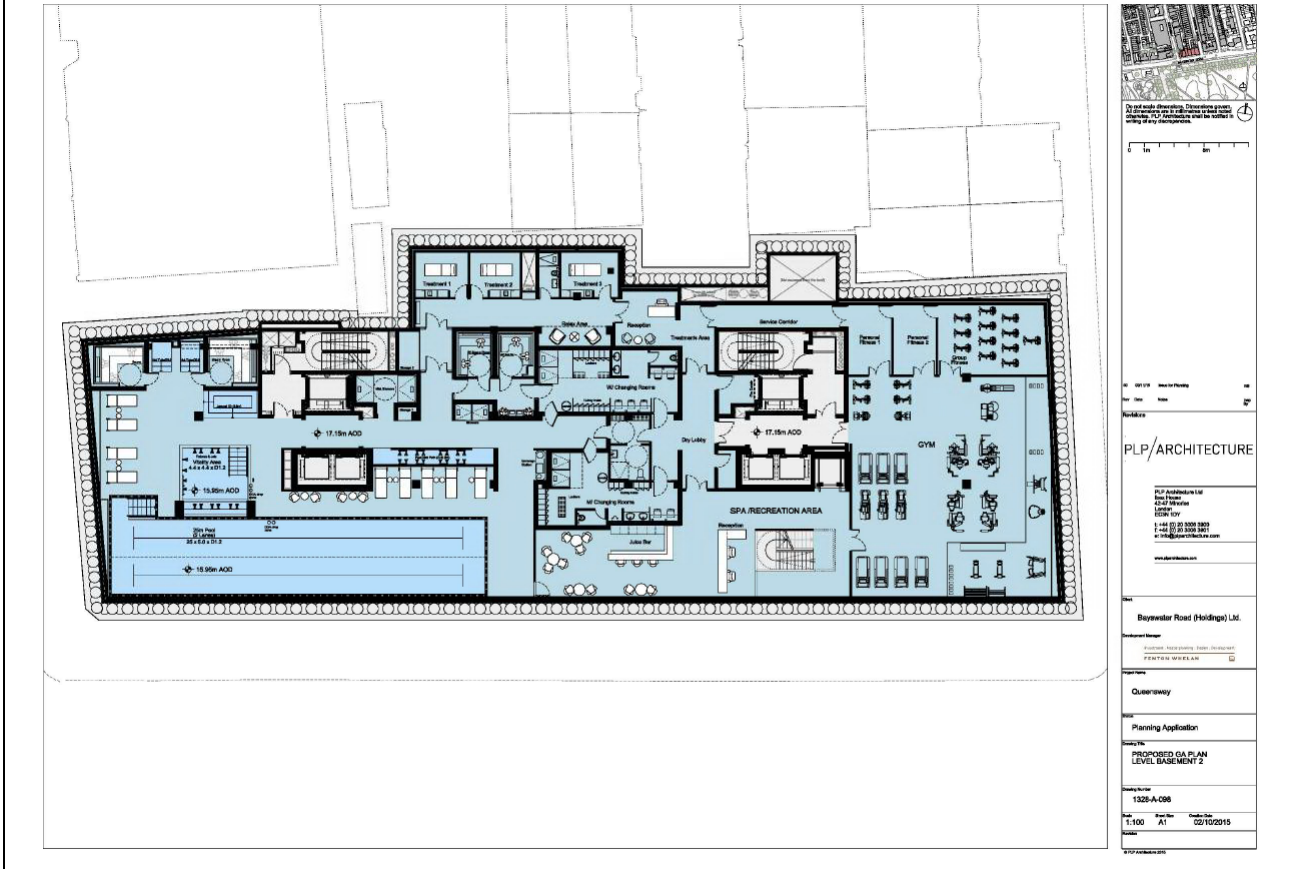
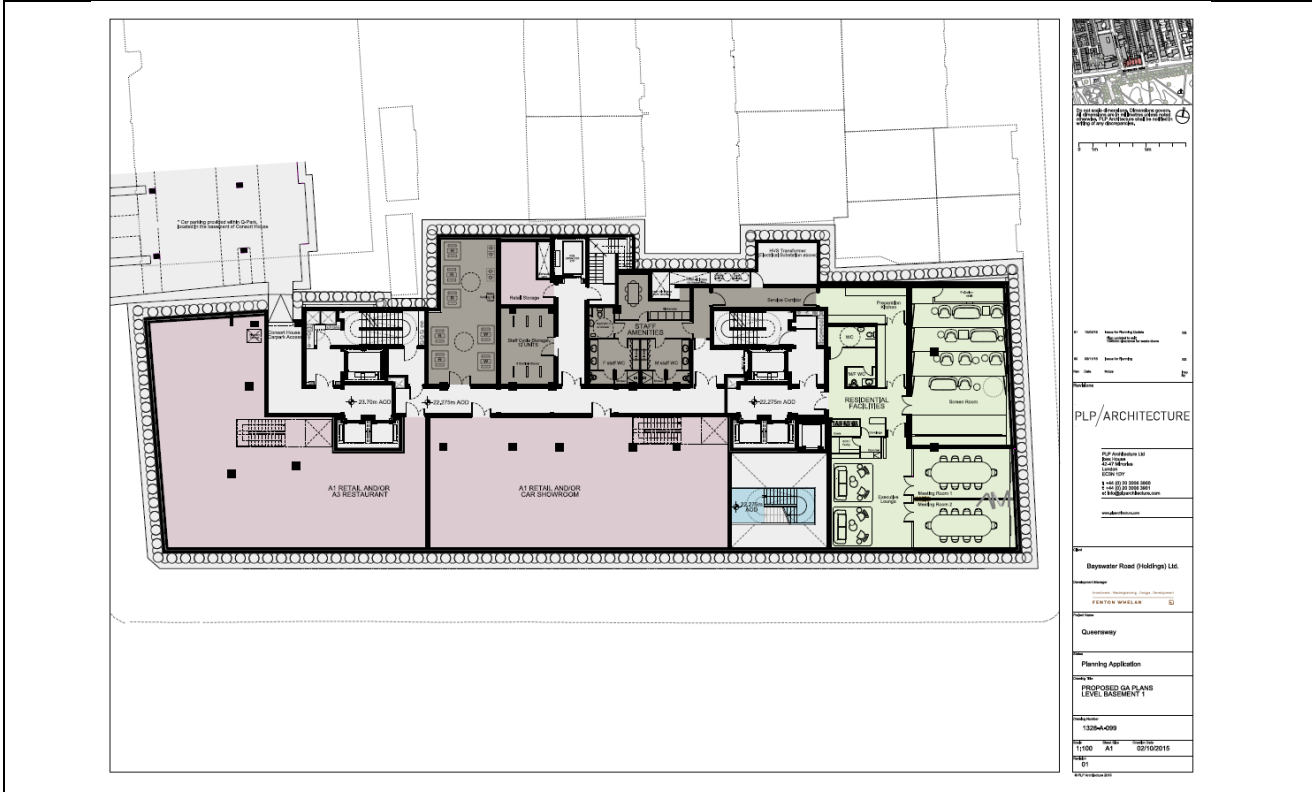


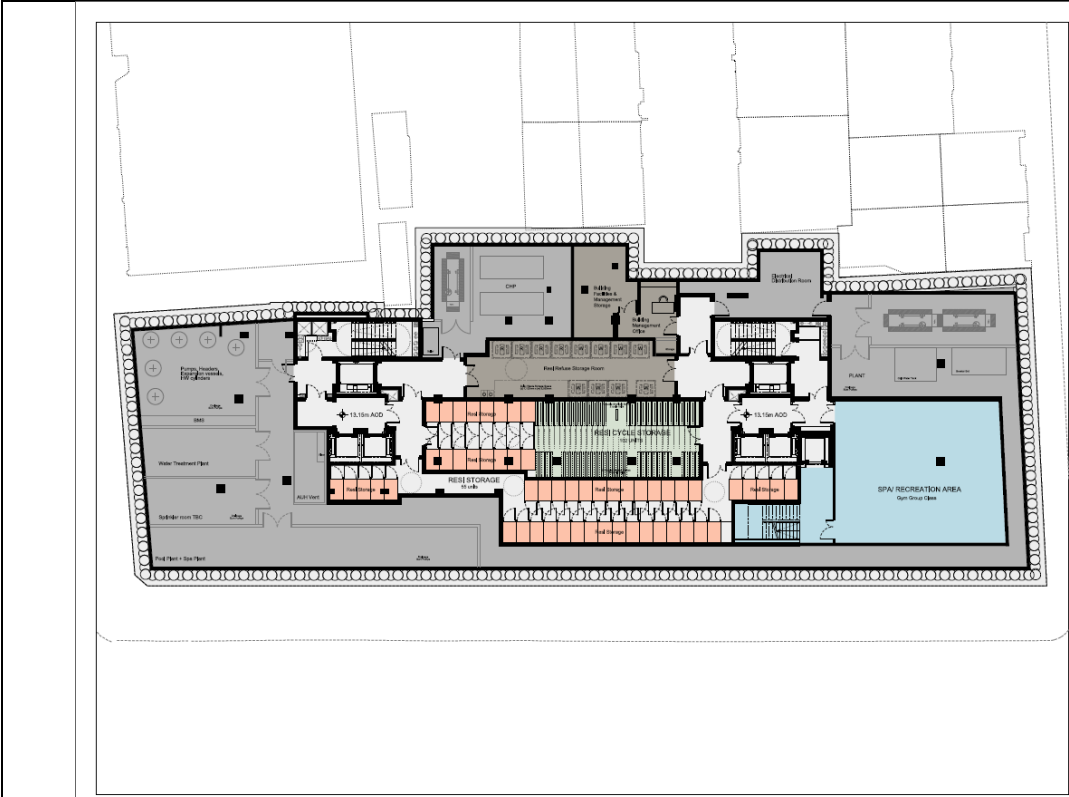
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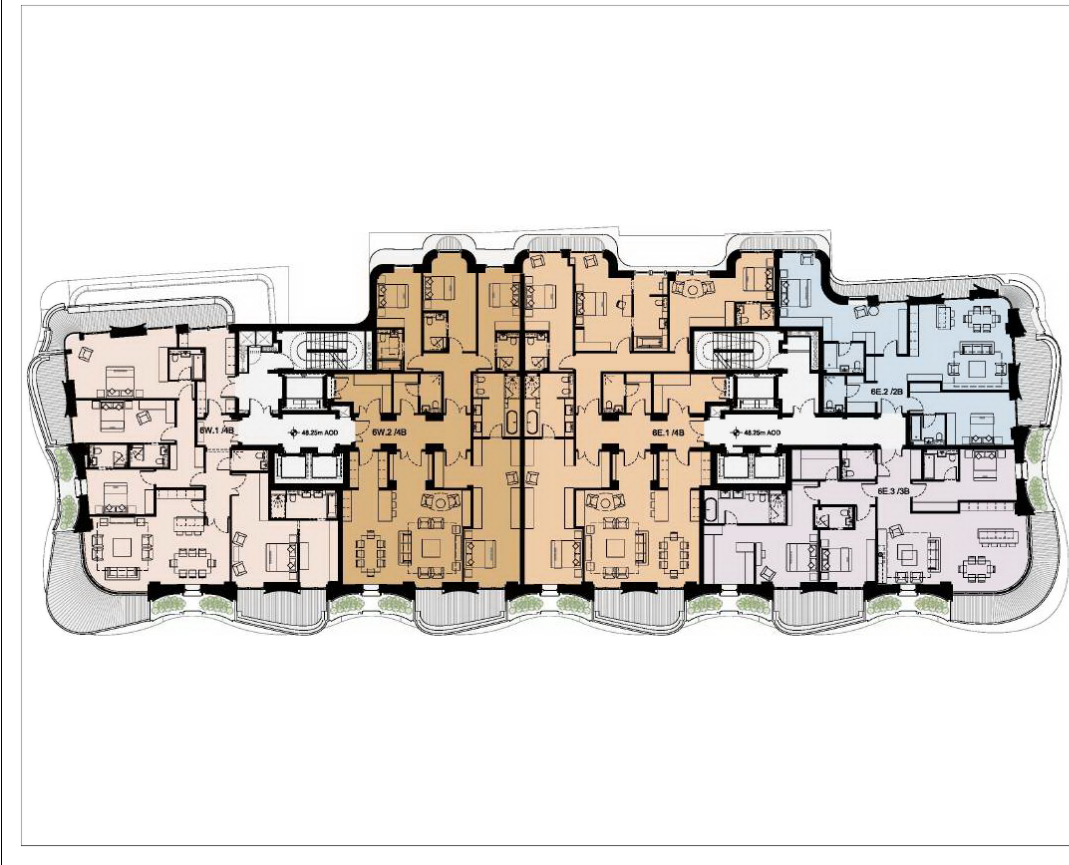
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PROPOSED GA PLANS LEVEL 00





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 PROPOSED GA PLANS
 LEVEL BASEMENT 3
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PLP/ARCHITECTURE
 1328-A-108
 PROPOSED GA PLANS
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