

JP/SB/P08001
13 September 2022

Attn: Rozina Vrlc

Planning
London Borough of Lambeth
PO Box 734
Winchester
SO23 5DG

Dear Ms. Vrlc,

RE: INITIAL OBJECTION BY THE UNION JACK CLUB TO PLANNING APPLICATION (REF: 22/02489/FUL) BY BOURNE CAPITAL

We write on behalf of our client, the Union Jack Club (UJC), to object to the recently submitted planning application (ref: 22/02489/FUL) for the demolition of 99-101, 103-107, 117 and 109-111 Waterloo Road, 124-126 Cornwall Road which seeks the following:

“Redevelopment for a new office building (Class E g) and flexible ancillary uses (Class E a, b) together with the refurbishment of 109-119 Waterloo Road (Mercury House) for Class E a, b, and g uses, and works to the public highway, public realm, new landscaping, ancillary and enabling works, plant and equipment”.

This letter constitutes the Union Jack Club's initial objection to the scheme and will be followed by a more detailed representation in due course.

The Union Jack Club (UJC), is a renowned private charity owned club in central London for serving and veteran non-commissioned personnel of His Majesty's Armed Forces, and their families. Founded on its current site in 1904, the Union Jack Club has in almost 120 years given refuge and unbroken support for millions of enlisted personnel, during times of war and peace, and today also welcomes London's 'blue light' emergency services. Today there are around 65,000 Armed Forces personnel who use it as their home or meeting place when in the capital.

The UJC is an incredibly important institution within Lambeth and The Club provides a 'home from home' for many servicemen and women, and their families, offering 300 rooms along with a restaurant, bar, small library and function rooms. The Club is the first point of call for service personnel passing through on assignment and those called upon to serve in London, including during the recent Covid crisis and again most recently following the death of Her Majesty, Queen Elizabeth II – the Club's patron.

The UJC's provides more than accommodation, it offers a base for a number of charities who regularly use the Club for meetings, training, fundraising and therapeutic services. Owing to its unique patronage charities such as Not Forgotten, bring PTSD sufferers to the UJC as they feel secure due to the high level of security and the military credentials of other guests. Other charities who regularly use the Club

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Ms Rozina Vrljic
13 Sep 2022

include Help for Heroes, The Soldiers Charity, the Widows Association, Blind Veterans UK, The Victoria Cross and St. George's Cross Association amongst others. The UJC plays an essential role in supporting our servicemen and women, veterans and their families.



Figure 1: The Longstanding Union Jack Club

Unfortunately, the invaluable facility provided at the UJC is being threatened by the recently submitted planning application on the adjoining site, owned by Bourne Capital. This proposal involves the construction of a 20 storey office building within close proximity of the Club. The UJC in no way objects to the principle of development of the neighbouring site. Indeed, the UJC has been trying to proactively engage with Bourne Capital to deliver a comprehensive masterplan led approach to the redevelopment of the UJC, Capital Towers and Bourne Capital sites, collectively referred to as 'Waterloo Triangle', for some time.

Despite these attempts, Bourne Capital have failed to meaningfully engage with the UJC and the Club is very disappointed a planning application has now been submitted with no regard to the fundamental concerns the UJC have consistently raised. In summary the UJC's principal concerns are as follows:

- The 20-storey building, which is due south of the UJC, is excessive in terms of its height, scale, bulk and mass and will result in a significant detrimental impact on the UJC and the valuable work it does. There will be a significant detrimental loss of daylight and sunlight to rooms within the southern elevation in particular. Given its close proximity to the shared boundary the proposal will appear overbearing and overdominant resulting in a significant loss of outlook from the UJC. The UJC is more than a mere hotel, it is a 'home from home' for our servicemen and women and should be adequately assessed as such within the submitted Daylight and Sunlight Assessment. Given the applicants failure to do so the UJC has commissioned its own Daylight and Sunlight Assessment which will form part of the UJC's more detailed objection to the scheme.
- The height, scale, massing and design of the proposal is contrary to Annex 10 of the Lambeth Local Plan 2021 which requires buildings have a maximum height of 70m AOD and to step down from north to south towards the Old Vic, a Grade II* Listed Building. The consequence

Ms Rozina Vrljic
13 Sep 2022

of this is that the proposal will result in substantial harm to the significance of this designated heritage asset and its setting. The submitted planning application fails to adequately assess the impact of the proposal on the Old Vic with the Townscape and Visual Impact Assessment showing a cropped view of the proposal taken to the east of theatre along The Cut (View 12) whilst View 21 Waterloo Road at Bayliss Road shows only a very small portion of the corner of the Old Vic. There is no view which shows the full scale of the 20 storey building in context with the Old Vic Theatre. Without this the Council cannot make a fully informed assessment of the impact of the proposal on the significance of the designated heritage asset and its setting, as required by paragraphs 200 to 202 of the National Planning Policy Framework. It is also noted in terms of the selection and type of views chosen within the TVIA there is a lack of consistency in terms of the approach with wirelines chosen in certain locations where rendered views would be more appropriate and would give a better representation of the true scale and impact of the proposal.

- The proposal is a significant missed opportunity to enhance the Waterloo area, particularly in terms of potential improvements to public realm and pedestrian connectivity at this important strategic location opposite Waterloo Underground Station. A cohesive masterplan approach to the Waterloo Triangle site as a whole would deliver better placemaking opportunities for the wider Waterloo area compared to the piecemeal nature of the current proposal. The proposal also fails to achieve the objectives of Lower Marsh/The Cut/Leake Street Special Policy Area in which it is located. The ground floor of the proposal is dominated by a very large entrance lobby on Waterloo Road and a generic Class E unit on Cornwall Road despite the policy requirements for the provision of 50% retail and 30% food and drink uses at ground floor in this location, to the detriment of the character of the area.
- The UJC is cognisant of the fact that their existing facility is nearing the end of its useable lifespan and will need substantial financial investment to ensure it continues to provide high quality accommodation and services. Consequently, the UJC have been exploring options to relocate to a purpose-built facility within Lambeth, ideally remaining in Waterloo, which would be funded by the comprehensive redevelopment of the existing site for alternative uses. The sheer scale, mass and bulk of Bourne Capital's proposal combined with its proximity to the shared boundary will significantly prejudice the UJC's ability to redevelop its own freehold site to the north. The UJC have engaged in pre-application discussions with the Council on a scheme for the northern section of the site which was positively received. Despite this Bourne Capital's planning application fails to consider the UJC's pre-application proposal within its Daylight and Sunlight Assessments and wider microclimatic assessments, a glaring omission.

The UJC have fundamental concerns with the planning application submitted by Bourne Capital and consider it will have a significant impact on the incredibly valuable service it provides. The UJC does not object to the redevelopment of their neighbours site, but feel the scale, height and mass proposed is excessive, contrary to the adopted Local Plan and should be reduced. The UJC wishes to work proactively with Bourne Capital to bring forward a comprehensive and considered masterplan plan approach to redevelopment within the 'Waterloo Triangle'. This represents a once in a generation opportunity to achieve proper planning and placemaking for this key strategic location, immediately opposite Waterloo Underground Station, and the current proposal fails to achieve this and is a significant missed opportunity.

Despite repeated requests for Bourne Capital to share details of their microclimatic assessments, in particular their Daylight and Sunlight Assessment, the Club did not have sight of these until the planning

Ms Rozina Vrljic
13 Sep 2022

application was submitted, which notably was during the summer holiday period. Of most concern is the fact the submitted Daylight and Sunlight Assessment does not adequately assess the current UJC facility which it considers to be a mere hotel use, nor does it consider the impact of the proposal on the UJC's pre-application scheme. The consequence of which is that the UJC has been required to commission its own Daylight and Sunlight Assessment to adequately assess the impact of Bourne Capital's proposals, which is currently underway.

Following the sad news of the passing of Her Majesty Queen Elizabeth II, the Club's patron, and announcement of ten days of national mourning the Club is currently engaged in preparations to support the funeral. Given the volume of technical documentation to review and the requirement for the UJC to undertake its own Daylight and Sunlight Assessment in particular, the UJC are seeking an extension until the 21st October 2022 to provide a more detailed representation to planning application ref: 22/02489/FUL.

Yours sincerely,

Siofra Boyd

For and on behalf of
Rolfe Judd Planning Limited

Cc Mr. Hugh Player, Chief Executive, Union Jack Club
Cc: Mr. Peter Davidson, Trustee, Union Jack Club