

JP/P08001  
21<sup>st</sup> October 2022

Attn: Ms. Rozina Vrlc

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

Dear Ms. Vrlc,

**RE: 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 formally object to the planning application (ref: 22/02489/FUL) for the demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 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 provides a more fulsome objection the initial objection dated 13<sup>th</sup> September 2022 and includes the following supporting documents:

- Sample of objections
- *Waterloo Estate proposals and the effects on Union Jack Club - Daylight, Sunlight & Overshadowing* report prepared by Delva Patman Redler dated 21<sup>st</sup> September 2022

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## 1. Executive Summary

- 1.1 The Union Jack Club (hereafter referred to as the UJC) is the freehold owner of a 0.34 hectare site directly adjacent to Waterloo Station, which comprises the UJC building and Capital Tower (for which Bourne Capital is the long leaseholder). The freehold site is bounded by Sandell Street to the north, Cornwall Road to the east and Waterloo Road to the west (see Figure 1 below). These two buildings alongside Nos. 99-107 Waterloo Road and Nos. 124 and 126 Cornwall Road and the public open space of Emma Cons Gardens have historically been referred to as the 'Waterloo Triangle' and shall continue to be referred to as such within this letter.
- 1.2 Bourne Capital is the property development group who own 'Grandseal Ltd and Connect Properties (UK) Ltd' - the Applicant. Bourne Capital are the owners of the central portion of the 'Waterloo Triangle' site to the south and have lodged a planning application for an office-led, mixed-use scheme. The existing buildings are predominantly 3 storeys in height, apart from Mercury House which is part 4 storeys and part 5 storeys. It is proposed to demolish 99-101 and 103-107 Waterloo Road and 124 & 126 Cornwall Road. This will be replaced by a new 20 storey office building, named 'Waterloo Central'. Mercury House will be refurbished to accommodate retail, office, restaurant and bar use and will remain at 4 storeys in height.

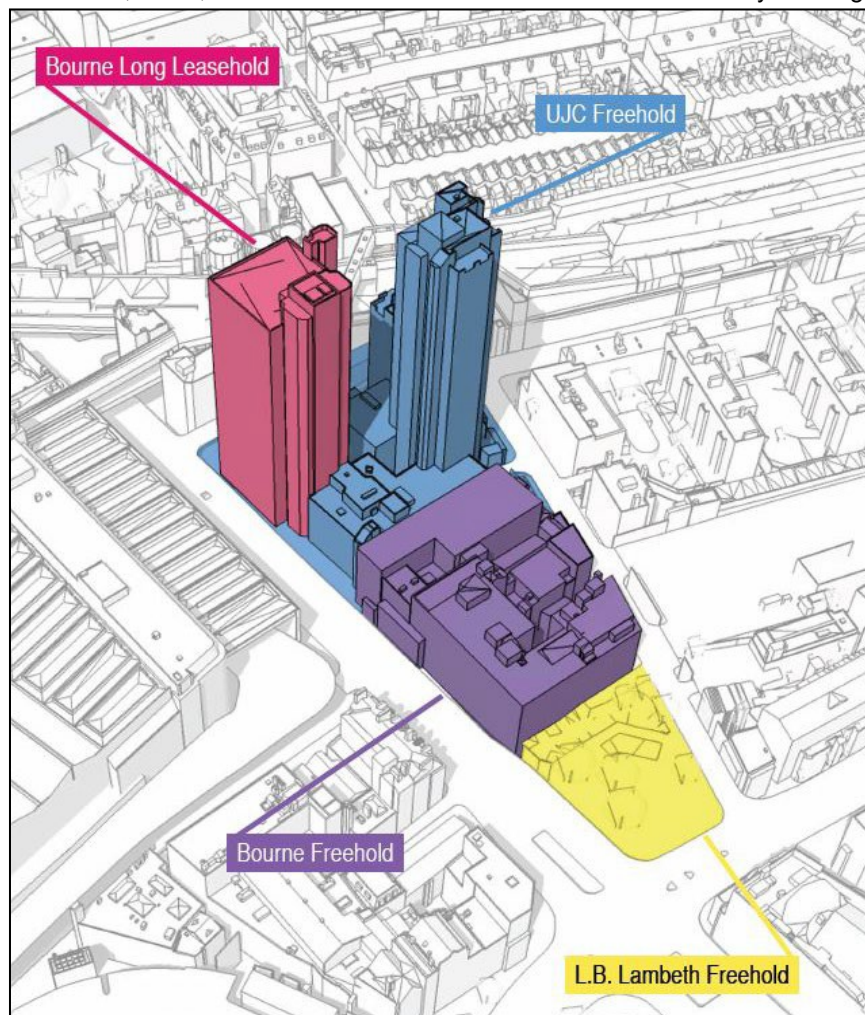


Figure 1: Land ownership in 'Waterloo Triangle' site

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- 1.3 The UJC, is a renowned national institution and charity (Registered Number: 208731), 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 UJC has for 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 over 66,000 Armed Forces personnel, serving and veteran, who use it as their home or meeting place when in the capital.
- 1.4 The UJC provides a 'home from home' for large numbers of servicemen and women, and their families, offering 261 rooms along with a restaurant, bar, small library and function rooms. It 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 Queen Elizabeth II – until recently, the UJC's patron.
- 1.5 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. 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 'Waterloo Triangle' sites for some time.
- 1.6 Despite these attempts, Bourne Capital have failed to meaningfully engage with the UJC. The UJC 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 not a 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 (enclosed) the results of which are discussed in detail below.
  - 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 is that this would result in substantial harm to the significance of this designated heritage asset and its setting.
  - 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 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

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large entrance lobby on Waterloo Road and a generic Class E unit on Cornwall Road contrary to 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 sheer scale, mass and bulk of Bourne Capital's proposal, combined with its proximity to the shared boundary, would significantly prejudice the UJC's ability to redevelop its own freehold site to the north, when that time comes.
- 1.7 The UJC have fundamental concerns with the planning application submitted by Bourne Capital 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 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. The current proposal fails to achieve this and is a significant missed opportunity.
- 1.8 The London Borough of Lambeth is a signatory to the Armed Forces Community Covenant. This outlines and confirms the Council's commitment to working and acting to honour the armed forces community; also to recognise and remember the sacrifices made by members of the Armed Forces community, particularly those who have given the most. Below, we explain the significant detrimental impact caused by Bourne Capital's redevelopment proposals on the UJC, an essential facility which serves the armed forces community. These proposals are contrary to principles of the Covenant.

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## **2. The Union Jack Club**

- 2.1 The Union Jack Club is a national institution and established Charity, until recently with the late Queen Elizabeth II as patron. Founded on its current site in 1904, the UJC has provided unbroken service to enlisted military personnel; currently with over 39,000 serving enlisted members of His Majesty's Armed Forces, and 26,000 veterans, as members; through two world wars and countless campaigns. The UJC provides a 'home from home' for many members and their families, offering 261 bedrooms along with a restaurant, bar, small library and function rooms and is the home of the only Victoria Cross (VC) and George Cross (GC) Roll of Honours.
- 2.2 The UJC, is a famous central London military membership club for serving and veteran non-commissioned members of His Majesty's Armed Forces, and their families. The UJC was founded, by a visionary military nurse named Ethel McCaul 'because officers had their clubs, but servicemen below commissioned rank had nowhere reputable to stay when alone, or with their families', in the country's capital. McCaul was determined that they should have this opportunity, and to see London and all its sights, but at no more of a cost than one day's pay. The UJC was opened by King Edward VII at Waterloo, Central London in 1907 and remains true to this founding vision in its historic location.
- 2.3 The UJC is the first point of call for service personnel passing through on assignment, and those called upon to serve in London such as in the recent Covid crisis. In addition to accommodation, there are a number of military charities who regularly use the UJC for meetings, accommodation, training, fundraising and therapeutic services. Their unique patronage is the main reason that it is used by military charities. For example, The Not Forgotten Association bring PTSD sufferers to the UJC because they feel secure due to the high level of security and the military credentials of other guests. In planning terms, the UJC is considered a 'Sui Generis' use due to the bespoke nature of the facility.
- 2.4 There are a number of military charities who regularly use the UJC for meetings, accommodation, training, fundraising and therapeutic services including:
- The Confederation of Service Charities (COBSEO) which acts as a single point of contact for interaction with Government; the Royal Household, the Private Sector; and with other members of the Armed Forces Community.
  - SSAFA The Armed Forces Charity which provides welfare, health and support services, for the UK military's serving personnel, veterans, and their families.
  - The Royal British Legion (RBL) which provides expert advice and guidance, to recovery and rehabilitation, through to transitioning to civilian life.
  - Not Forgotten Association which provides events for wounded serving personnel and disabled veterans, which improve physical and mental health, address isolation and loneliness, and promote a sense of community and balance.
  - ABF- The Soldiers Charity (Army Benevolent Fund) awards grants to individuals and families, and fund leading organisations that support soldiers, former soldiers, and their families.
  - Help for Heroes - support veterans and their families in their homes and communities across the UK, help people improve physical and mental health.
  - RFEA – The Regular Forces Employment Association – which provides support, jobs and training opportunities to Service leavers, reservists, veterans and their families.
  - Royal Voluntary Service (RVS) - organise volunteers to support people in need, and the NHS. Volunteers work with healthcare teams and in communities providing practical help and emotional support

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- RMA – Royal Marines Charity – which provides support, advice and friendship to serving and retired Royal Marines, their families
  - Drive Project - arts recovery programme for the Ministry of Defence – to support injured veterans transition into civilian life using storytelling and narrative as critical skills.
  - RAF Widows Association – support people whose spouse or partner served in the RAF; or those who themselves serve or served and whose spouse or partner died whilst they were serving.
  - Coldstream Guards Association - Assisting members or former members of the Regiment with their transition to civilian life.
  - Grenadier Guards Association - welfare assistance to Grenadiers or their families who are in need.
  - Blind Veterans UK - helps vision-impaired ex-Servicemen and women to rebuild their lives after sight loss. Provide rehabilitation, training, practical advice and emotional support to veterans regardless of how or when they lost their sight.
  - BLESMA - assisting serving and ex-Service men and women who have suffered life-changing limb loss or the use of a limb, an eye or loss of sight in the honourable service of our country.
  - Combat Stress – supporting veterans with mental health challenges, particularly PTSD.
  - Royal Naval Association – supporting all who have served in the Royal Navy, Royal Fleet Auxiliary, and Queen Alexandra’s Royal Naval Nursing Service.
  - Style for Soldiers - aims to offer long term support through smart clothing, regimental walking sticks and reunion events
  - VC & GC Association - represents all living holders of the Victoria Cross and its equivalent the George Cross, which is awarded to civilians and military personnel. Help and support its members and their families.
  - And many other smaller service and emergency services charities.
- 2.5 As is evident from the number of objections to the scheme (over 1,120 to date) from serving and former servicemen and women the Union Jack Club is not a hotel. It provides respite and refuge for those that have served their country, a number of whom now suffer physical disabilities and illnesses such as Post Traumatic Stress Disorder as a consequence of their service. A small sample of some of the objections has been included as Appendix 1, which demonstrates the importance of the Union Jack Club to the armed forces community.
- 2.6 We understand Bourne Capital received legal advice as to the use of the UJC under the Town and Country Planning (Uses Classes) Order 1987 (as amended) which considered it to be a Class C1 (hotel) use. On this basis the submitted Daylight and Sunlight Assessment has not appropriately considered the impact of the proposed development (ref: 22/02489/FUL) on the UJC.
- 2.7 Understandably the security and privacy of those visiting the UJC is of paramount importance and as such one cannot gain a full understanding of the vital role the UJC plays in the lives of servicemen and women from simply visiting the UJC’s website. Bourne Capital’s Counsel could therefore not have been in full possession of the facts in providing such a legal opinion. In addition, we note the UJC is a registered charity, it has a Board of Trustees (the Governing Council), is a not-for-profit organisation, it works under a comprehensive set of Club Rules, it exists to serve its members and is not open to the public.
- 2.8 It is evident from the range of comments in Appendix 1 from users of the UJC that it is an essential facility which supports the armed forces community and their families. It is so much

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more than a hotel, it is a bespoke ‘Sui Generis’ use and the impact in terms of loss of daylight and sunlight on this important and historic facility should have been fully considered by Bourne Capital’s planning application, which it has failed to do.

### **3. Reasons for Objection**

#### **3.1 Loss of Daylight, Sunlight and Overshadowing**

3.1.1 The Daylight and Sunlight Report prepared by Waldrams, dated 07 July 2022, was based on their erroneous assessment on the UJC being a hotel (Class C1) due to the temporary nature of the accommodation and thus has not assessed the impact of the proposals on the UJC appropriately. Therefore, the UJC have commissioned their own Daylight and Sunlight Assessment, prepared by Delva Patman Redler, which is included as Appendix 2, with consideration for the appropriate Sui Generis use class. In summary, the assessment concludes:

1. The Bourne Capital scheme proposals (ref: 22/02489/FUL) would have a predominately major adverse impact on the existing UJC buildings in daylight and sunlight terms when compared against the existing situation.
2. In terms of daylight, the significance criteria tables demonstrate that of the transgressions in both Vertical Sky Component (VSC) and No Sky Line (NSL) terms that the majority of these are transgressions are in the 40% or over category which can be considered a major adverse impact. This is not surprising given the very close proximity of the tower element of the Bourne Capital proposals.
3. The Bourne Capital proposals (ref: 22/02489/FUL) would cause additional overshadowing to the existing UJC building elevations for long periods of the day. The UJC’s elevations are not in shadow in the existing situation.
4. The existing podium level of the UJC Buildings would be in permanent shadow for the majority of the day.
5. The Bourne Capital proposals would have a detrimental effect on the development potential of the UJC site with elevations of a scheme massing facing onto the Bourne Capital proposals experiencing some areas of low Vertical Sky Component (VSC) daylight levels resulting in any single aspect rooms within the UJC requiring supplementary electrical lighting. In addition, and similarly to point 2 above, the nearest elevations of any redevelopment proposal would be impacted in terms of permanent shadow as a result of the Bourne Capital proposals.
6. If the Rolfe Judd Architecture pre-application proposals for the UJC site were built, they cause effectively no additional impacts in daylight illuminance and sunlight exposure within the rooms of the Grainger OCCC scheme from what they would enjoy in the current existing situation.
7. If the Rolfe Judd Architecture pre-application masterplan vision for both sites were built, they cause the same or less effects on the Grainger OCCC scheme in daylight illuminance and sunlight exposure terms compared to the effects of the Bourne Capital proposals on the basis they are built out in isolation.
8. The Bourne Capital Daylight and Sunlight Assessment prepared by Waldrams confirms a 3D assessment model was prepared and utilised for assessments. However, it does mention that ‘some’ of the neighbouring windows have been ‘estimated’ based on brick

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counts'. Given the size of the planning application, it would have been prudent to procure a measured point cloud survey, like the UJC did as part of their assessments, to ensure accuracy in the results and a robust nature in the report.

9. The Bourne Capital Daylight and Sunlight Assessment has considered the effects on the existing UJC facility by using the now superseded Average Daylight Factor (ADF) methodologies. Given the UJC is a well-established existing building, it is suggested that adopting the ADF methodology to understand whether the rooms would meet target values is not the correct method of assessment to understand the daylight effects to the UJC. It can be used in instances where existing buildings may perform relatively badly as further justification for the effects but not as a substitute.
  10. The Bourne Capital daylight & sunlight report considers the potential effects on the Grainger OCCC scheme proposals which were granted consent at appeal. We are aware the applicant is currently in for a s73 and some of the massing and/or room configurations/uses are proposed on being altered which could potentially alter the compliance rates being reported. Similarly to point 8, the effects to this property have been considered using ADF which has been superseded. Although this was recognised as being the correct method to consider daylight to new buildings, the applicant should have considered it based on the new daylight illuminance/daylight factor metrics as outlined in the BRE third edition 2022. All our assessments have been based on this which demonstrates that a number of rooms within the current s73 OCCC scheme would experience an effect greater than what is suggested in the guidelines in comparison to how they are attempting to justify the results based on local historic precedent citing a few nearby consents.
- 3.1.2 Overall 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 loss of daylight and sunlight to rooms within the southern elevation in particular as shown in Figures 3 and 5 below.

### **3.2 *Prejudicing potential for redevelopment of the UJC site***

- 3.2.1 The UJC is cognisant 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 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.
- 3.2.2 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.
- 3.2.3 Therefore, the potential effects of the Bourne Capital proposal on the pre-application scheme have been assessed in the UJC commissioned report and conclude:
  - Given the close proximity of the Bourne Capital Proposals invariably results in large areas of the immediate elevation experiencing quite low VSC values (27% is the BRE target value) demonstrating that any scheme the UJC was to bring forward would be severely affected in daylight terms with any single aspect rooms within the massing requiring

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supplementary electrical lighting.

- If residential use was proposed on the UJC site, a large number of proposed rooms would fall below the BRE guide recommendations in terms of daylight illuminance and sunlight exposure, with elevations likely to be in permanent shadow.

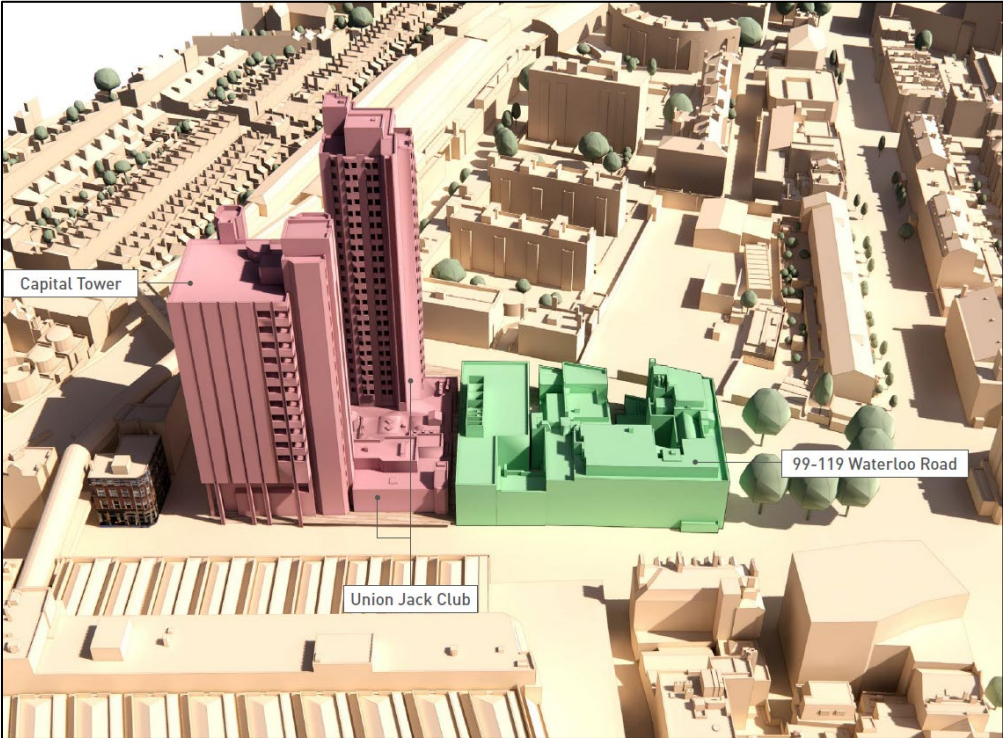


Figure 2: Existing buildings with the proposed Waterloo Central Office development outlined, as viewed from Waterloo Road.

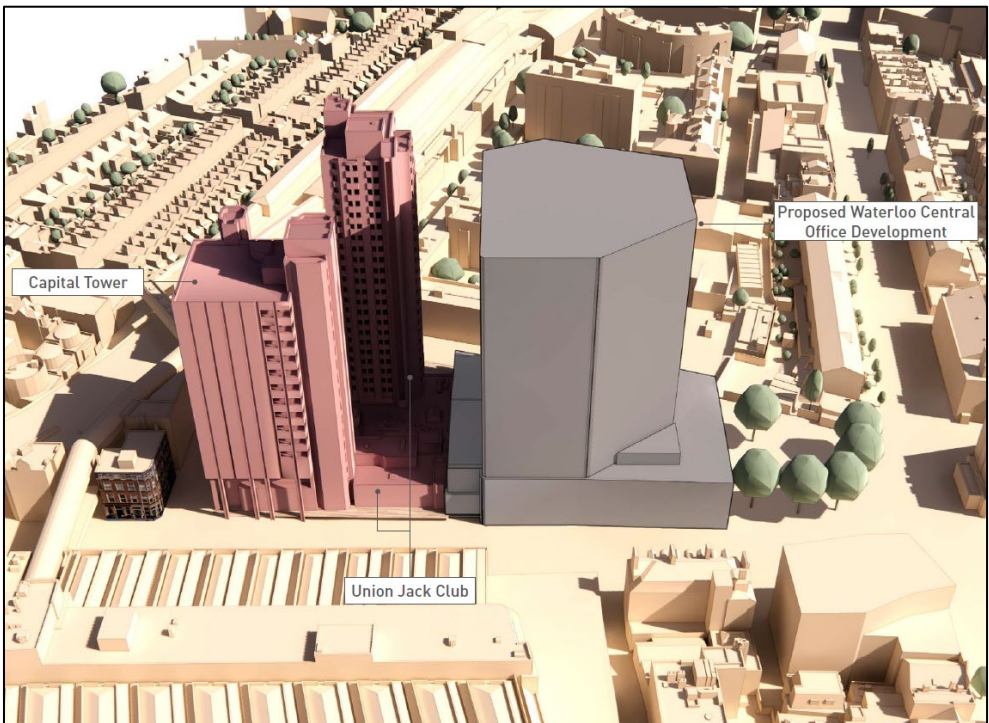


Figure 3: The proposed Waterloo Central Office development on 21<sup>st</sup> December as viewed from Waterloo Road, aerial view

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**Figure 4: Existing buildings from the North-East, aerial view**



**Figure 5: The proposed Waterloo Central Office development with existing Union Jack Club and Capital Tower, aerial view**

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**3.3 Overbearing and Over Dominant**

3.3.1 In the Lambeth Local Plan, the Waterloo Triangle is identified as a location appropriate for tall buildings. For Location W6 the general building height is “70m AOD stepping down to the south”. The definition of a tall building is anything above 45m north of the South Circular Road. Therefore, the policy is clear that buildings located within this block should step downwards from 70m AOD to 45m on this block. As shown in Figures 7 and 8 below, the proposed Waterloo Central building well exceeds the requirements for a building located on the southern part of W6 being 73.9m AOD and is therefore considered to be contrary to Policy Q26 of Lambeth.

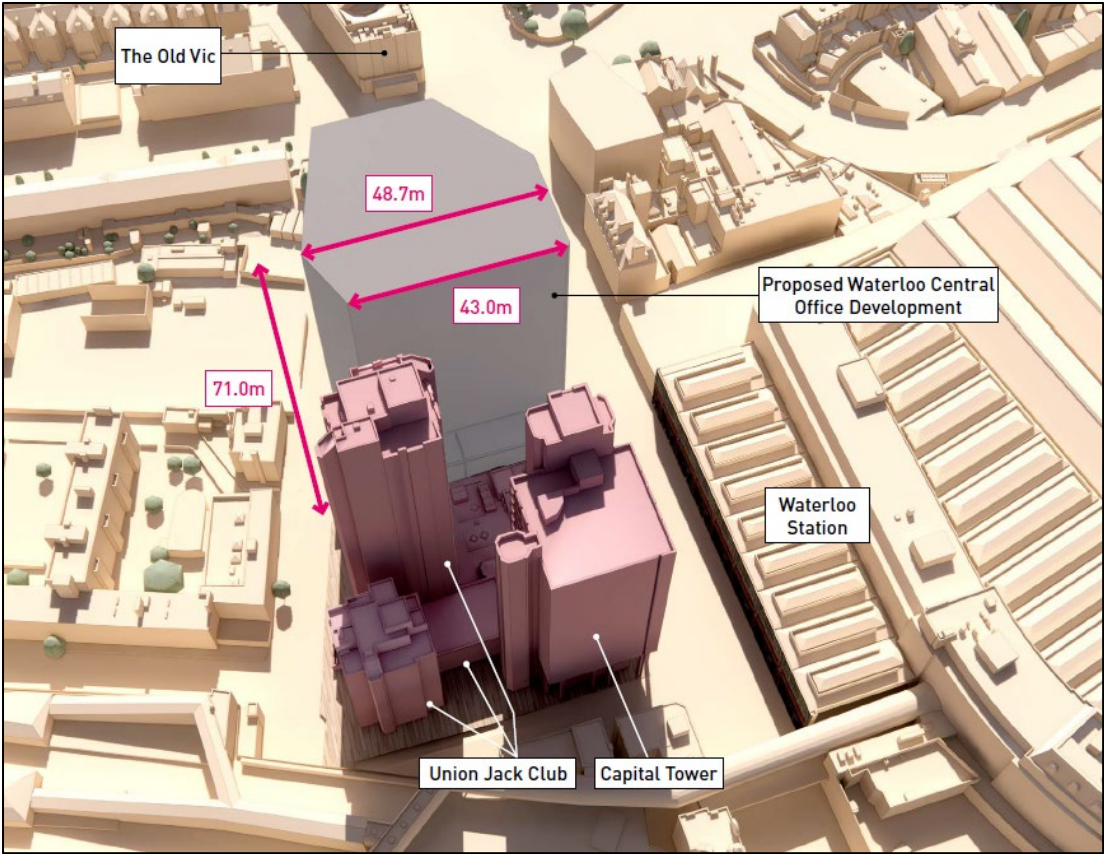


Figure 6: Diagram demonstrate the excessive width of the proposed development

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Figure 7: Waterloo Central relative to Old Vic Theatre and Policy Q26 requirements (view facing west)

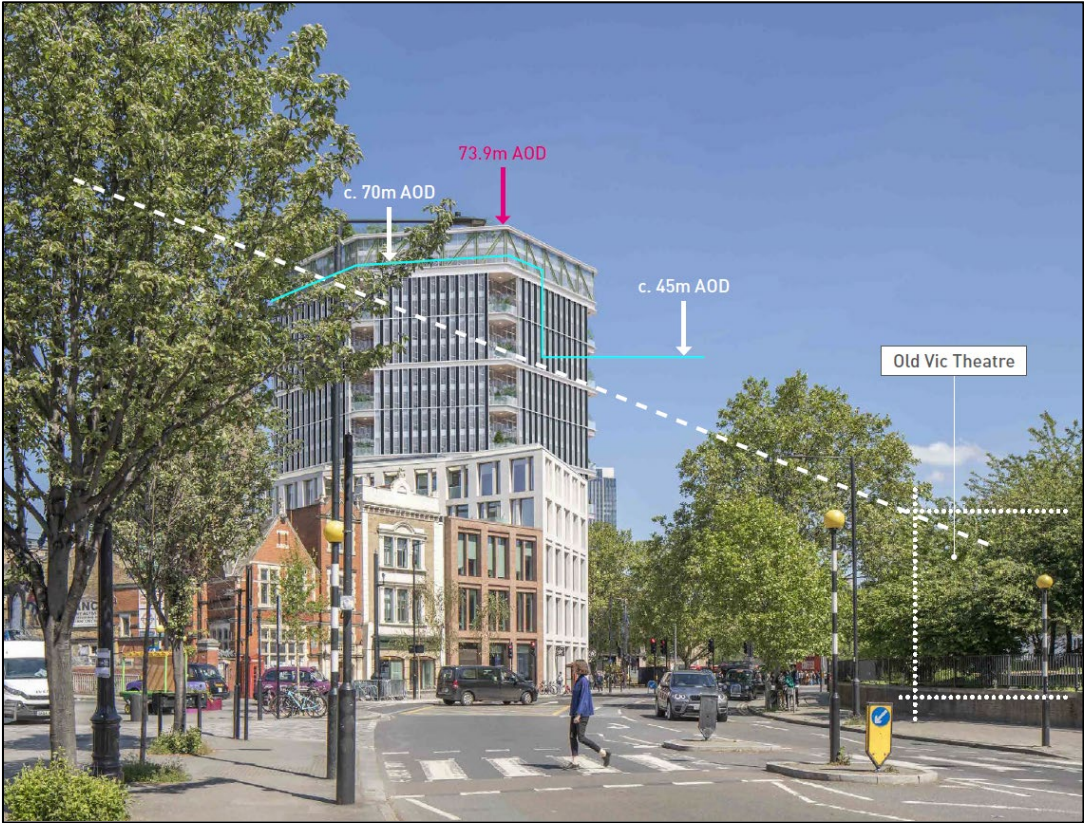
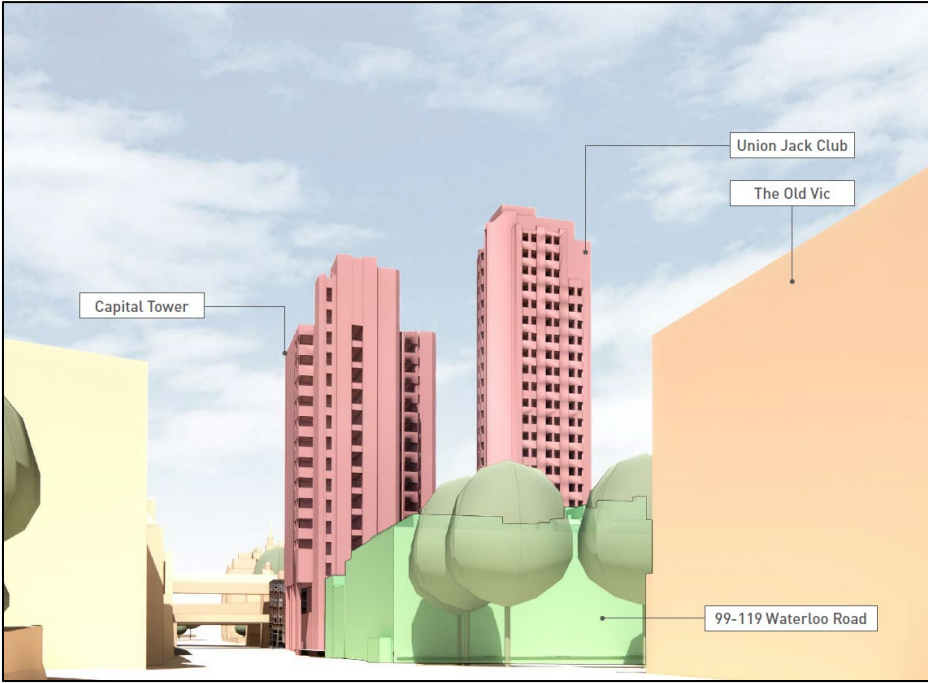


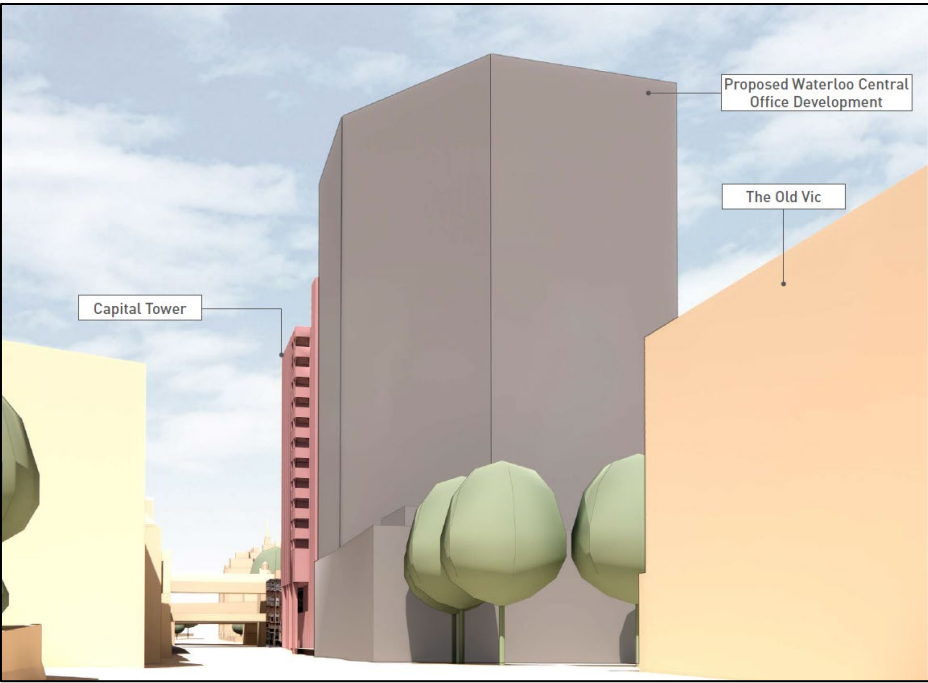
Figure 8: Waterloo Central relative to Old Vic Theatre and Policy Q26 requirements (view facing south east)

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3.3.2 In order to gain a meaningful understanding of the adverse impact which will be caused by the proposed Waterloo Central development should it be consented, a comparative study which explicitly highlights the consequences of the proposal through a direct comparison to the existing conditions of the site when viewed from the surrounding area, has been carried out by the UJC.



**Figure 9: Existing UJC building when viewed from Waterloo Road**



**Figure 10: Proposed Waterloo Central building when viewed from Waterloo Road**

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3.3.3 Figure 9 above shows the existing street level view from Waterloo Road looking north, adjacent to The Old Vic, reveals Capital Tower and the Union Jack Club buildings as unobstructed slender towers which are distinguished in their local setting through their respective heights. By superimposing the proposed Waterloo Central development within the same view in Figure 10, it is clear that it creates a wall of development which dominates its context and skyline due to its excessive scale both in terms of its height and width.

3.3.4 Given its close proximity to the shared boundary the proposal will appear over dominant resulting in a significant loss of outlook from the UJC as shown below. The suggested 20-storey building, which would be within 15.4 metres of the UJC tower and stretch across the full width of the UJC’s southern elevation which contains a significant number of windows. This will be felt most drastically on the southern façade of the UJC building particularly where the proposed outdoor terraces overlook the UJC building at the podium level, with little to no setback from the shared boundary.

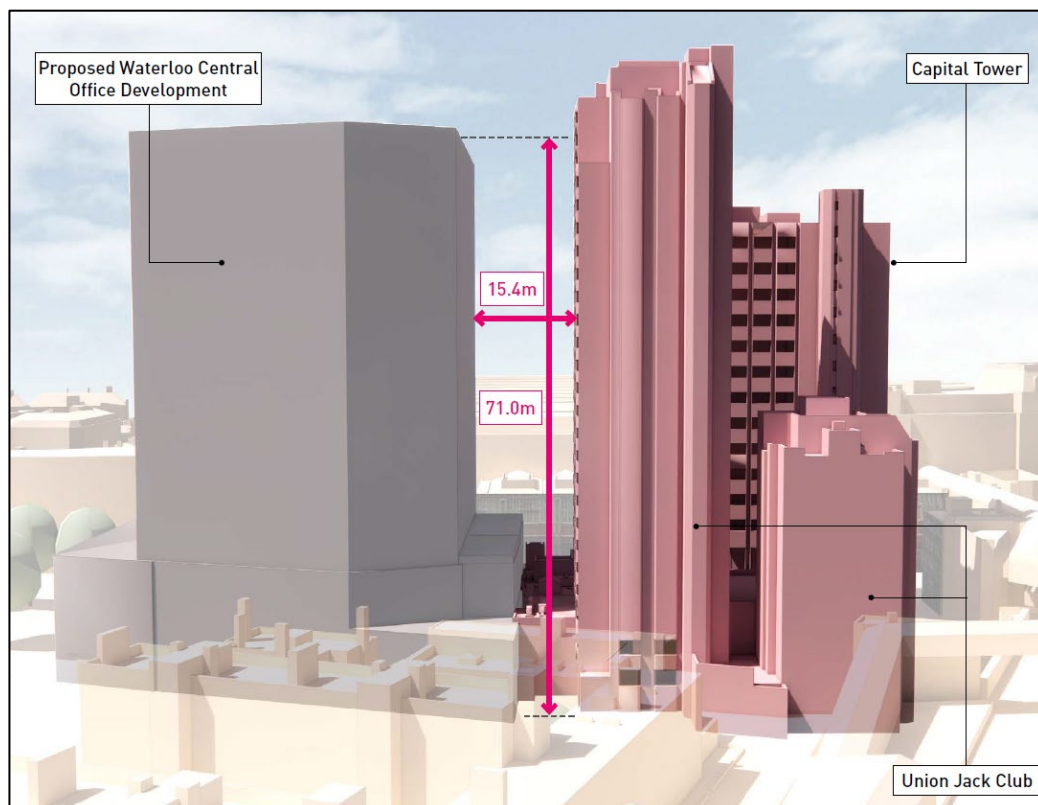


Figure 11: The proposed Waterloo Central Office development with existing Union Jack Club and Capital Tower, looking west.

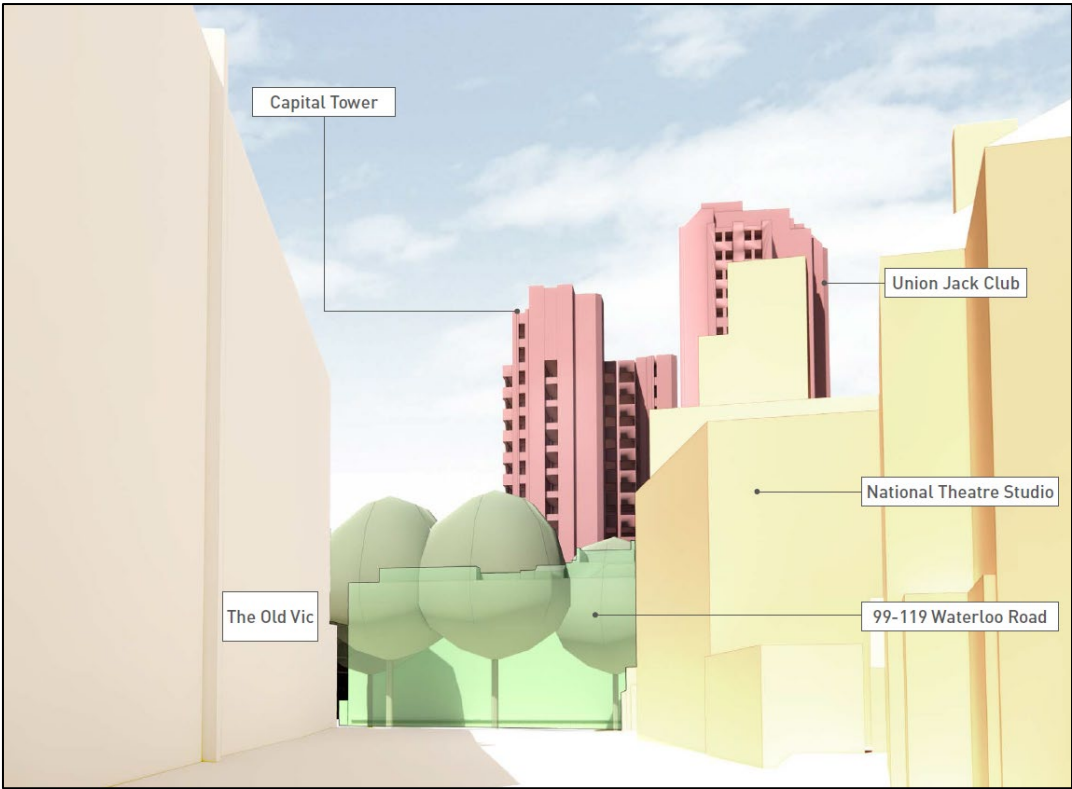
3.3.5 Overall, the proposed development will result in a significant loss of outlook and will appear overbearing by virtue of its height, scale and proximity to the boundary. As outlined previously, it is considered this significant detrimental impact on the UJC could potentially be mitigated through the provision of a narrower building with a reduced height, which steps down to the south as required by Policy Q26, and an increased separation distance to the shared boundary, which shall be discussed further below.

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### **3.4 Substantial Harm Caused to Designated Heritage Assets**

- 3.4.1 The proposal site is located north-east of National Theatre Rehearsal Studios, which is a Grade II listed building, to the north of the Old Vic Theatre which is a Grade II\* listed building and to the east of the Former Waterloo Road Fire Station which is a Grade II listed building. In light of this any future redevelopment on the Waterloo Triangle must be sensitively designed to respect the significance of the heritage asset and its setting, as required by paragraph 199 of the NPPF.
- 3.4.2 It is worth noting that planning permission (ref: 13/05883/FUL) for the demolition of an existing shop and erection of an 8-storey building, and a subsequent planning application (ref: 15/01726/FUL) for the erection of a 5-storey building at Nos. 124-126 The Cut to the north of the Old Vic and National Theatre Rehearsal Studios were both refused on the basis that the overall height, massing, bulk scale, and design of the building was not acceptable and would have the potential to harm the special interest of these neighbouring listed buildings. The development was later approved with design changes at a height of 5 storeys. These two refused planning permissions (ref: 13/05883/FUL and 15/01726/FUL) highlight the sensitivity of listed buildings, in particular The Old Vic Theatre, to developments proposing additional height, bulk and mass.
- 3.4.3 A comparative exercise has been undertaken with Figure 12 showing the existing street level view from Webber Street looking north, which separates The Old Vic, and National Theatre Rehearsal Studios. It shows the significantly lower scale and massing of the buildings located on The Cut and adjacent to Emma Cons Gardens. In direct contrast, as is demonstrated in Figure 13, the proposed development appears imposing and overly dominant when viewed from Webber Street causing substantial harm to these two heritage assets and their settings. It demonstrates again the importance of buildings within the Waterloo Triangle to step down in height towards The Old Vic, as required by the Lambeth Local Plan, which this proposal wholly fails to adhere to.
- 3.4.4 Given that Waterloo Central significantly exceeds the general building height for Location W6 as required by the Local Plan, it is considered that the overall height, massing, bulk, scale and design of the building would cause substantial harm to the special interest of neighbouring listed buildings and their settings. It is not considered the wider public benefits of the proposal, such as the provision of new office accommodation, would substantially outweigh that harm. The proposal is thus contrary to paragraphs 200-201 of the NPPF and thus the Local Planning Authority should refuse consent.

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*Figure 12: Existing buildings as viewed from Webber Street, adjacent to The Old Vic.*



*Figure 13: The proposed Waterloo Central Office development, as viewed from Webber Street, adjacent to the Old Vic Theatre.*

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### 3.5 *Inadequate Townscape and Visual Assessment*

3.5.1 The submitted planning application fails to adequately assess the impact of the proposal on the Old Vic, the National Theatre Rehearsal Studios and the Former Waterloo Fire Station within the accompanying Townscape and Visual Impact Assessment (TVIA). The submitted TVIA shows cropped views of the proposal taken to the east of The Old Vic 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. Additionally, there are no views within the submitted TVIA which show the full impact of the proposal on the National Theatre Rehearsal Studio or former Waterloo Fire Station.

3.5.2 Without a more complete analysis the Council cannot make a fully informed assessment of the impact of the proposal on the significance of these designated heritage assets and their settings, 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 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. More detailed comments on each of the views included in the TVIA are included below:

| View | Description   | Comment   |
|------|---|---|
| 1    | LVMF 19A.1   Lambeth Bridge: downstream - at the centre of the bridge                             | Wireline drawing only – difficult to see proposed building. Shading and/or labels would assist in identifying the proposed and cumulative schemes.  |
| 2    | LVMF 20B.1   Victoria Embankment: between Waterloo and Hungerford Bridges - at Cleopatra's Needle | Wireline drawing only – difficult to see proposed building. Shading and/or labels would assist in identifying the proposed and cumulative schemes. The view is showing the proposed building as a blue dash under the bridge. |
| 3    | Waterloo Bridge   | Wireline drawing only – rendered view would be more appropriate to provide scale.   |
| 4    | LVMF 27A.2   Parliament Square: south-west - the traffic island north                             | Wireline drawing only – difficult to see proposed building. Shading and/or labels would assist in identifying the proposed and cumulative schemes.  |
| 5    | Parliament Square: west pavement, south - outside UK Supreme Court                                | No comment.   |
| 6    | Stamford Street / Cornwall Road   | Wireline drawing only – This should be rendered to show true scale and impact.  |
| 7    | Cornwall Road   | Wireline drawing only – This should be rendered to show true scale and impact.  |
| 8    | Whittlesey Street / Windmill Walk   | No comment.   |
| 9    | RouPELL Street / Theed Street   | Wireline drawing only – This should be rendered to show true scale and impact.  |
| 10   | The Cut opposite Joan Street  | No comment.   |
| 11   | The Cut   | No comment.   |

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|    |  |   |
|----|--|---|
| 12 | The Cut / Webber Street                    | Cropped view which needs to be pulled back to show full scale of the building and views from the Old Vic.<br><br>Winter view should be provided as the building is largely screened by vegetation and to show proposal in relation to the Former Waterloo Fire Station. |
| 13 | Webber Street                              | Winter view should be provided.   |
| 14 | Lower Marsh / Westminster Bridge Road      | Camera unknown.<br><br>Wireline drawing only - This should be rendered to show true scale and impact.   |
| 15 | Lower Marsh / Frazier Street               | Wireline drawing only – difficult to see proposed building. Shading and/or labels would assist in identifying the proposed and cumulative schemes.  |
| 16 | Baylis Road / Lower Marsh (outside Cubana) | Winter view should be provided.   |
| 17 | IMAX Gyratory                              | Wireline drawing only - This should be rendered to show true scale and impact.  |
| 18 | Waterloo Road -station entrance / exit     | Cropped view which needs to be pulled back to show true view from the Former Waterloo Fire Station.<br><br>Winter view to be provided particularly to show relationship with the Old Vic theatre.   |
| 19 | Waterloo Road / Pearman Street             | Wireline drawing only – This should be rendered to show impact on the Old Vic Theatre.  |
| 20 | Waterloo Millennium Green                  | Wireline drawing only –This should be rendered to show Impact on Millennium Green.<br><br>Winter view to be provided particularly to show relationship with the Old Vic theatre.  |
| 21 | Waterloo Road at Baylis Road               | Winter view should be provided.   |
| 22 | Ufford Road Park                           | Wireline drawing only - This should be rendered to show true scale and impact.  |
| 23 | Brockwell Park                             | No comment.   |
| 24 | Norwood Park                               | No comment.   |

### **3.6 Lack of Retail Frontage**

3.6.1 The development is located within the Central Activity Zone (CAZ) and the Lower Marsh/The Cut/Leake Street Special Policy Area which requires active frontage uses at ground floor level under Policy ED7. Exceptions are allowed only outside of the primary shopping area where the nature of the development does not allow for this and/or it can be shown that a fully serviced active frontage use is unlikely to be let. There will be a noticeable reduction in activation along Waterloo Road, through the loss of two retail units (Sainsbury's Local and Tesco Express) to be replaced by an entrance lobby to the proposed offices, with only 26.4m of retail frontage proposed (refer to Figure 14 and 15 below).

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3.6.2 Policy PN1(C)(i) requires at least 50 per cent of ground floor units in the Lower Marsh / The Cut / Leake Street Special Policy Area to be in retail use. The proposed ground floor retail area is 919 sq.m which is 35.6% of the GEA and 38.5% of the GIA which is well below the 50% required. Overall, this is considered to be a poor urban design outcome which does not meet Policies ED7 or PN1 and will not improve the public realm at this key London transport gateway.



Figure 14: Existing extent of retail/restaurant frontage on Waterloo Road annotated in red

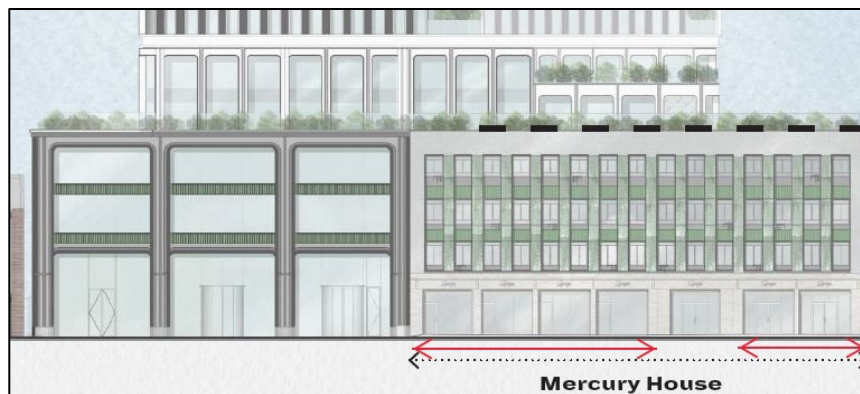


Figure 15: Proposed extent of retail frontage on Waterloo Road annotated in red

### 3.7 Lack of Strategic Masterplan for Redevelopment within the Waterloo Triangle

3.7.1 As previously outlined, the UJC are fully supportive of the principle of redevelopment within the Waterloo Triangle, given their own ambitions for their landholding, and welcome the opportunity to work with parties such as Bourne Capital as part of a design-led approach to site optimisation, as required by Policy PN1 of the Local Plan. The UJC feel that there is a substantial opportunity for coordinated regeneration and good placemaking for the wider 0.7 hectare Waterloo Triangle site. The Waterloo Triangle is strategically located being directly adjacent Waterloo Station and the entrance to the London Underground, within the London Plan Waterloo Opportunity Area, Lower Marsh Central Activities Zone Frontage Boundary and Central Activities Zone - Article 4 B1a-C3.

3.7.2 However, the UJC have fundamental concerns about the scale, mass and design of the proposals by Bourne Capital. It is felt strongly that the proposals will have a significant detrimental impact on the existing UJC facility, the future development potential of the UJC landholding and the surrounding context, including designated heritage assets. It portrays all of the characteristics of unsympathetic piecemeal development and other than the provision of new office accommodation will deliver few planning benefits. Importantly it also reduces rather

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than enhances public realm and street activation, two key objectives for the Waterloo area.

3.7.3 Despite the UJC raising these concerns with Bourne Capital directly, the scheme has continued to develop in a similar form and was presented to Lambeth's Planning Applications Committee in June 2021. It is understood officers have since expressed a strong desire that the Bourne Capital proposals respond more appropriately to their context and adequately respect neighbours such as the Union Jack Club and the consented Grainger scheme to the east.

3.7.4 The UJC are in the process of developing a masterplan for the wider Waterloo Triangle site and have met with Council to discuss this emerging masterplan as part of a formal pre-application meeting, in addition to making representations to the Council's Planning Policy and Strategy Team to have the entire site allocated for redevelopment within the draft Site Allocations Development Plan Document.

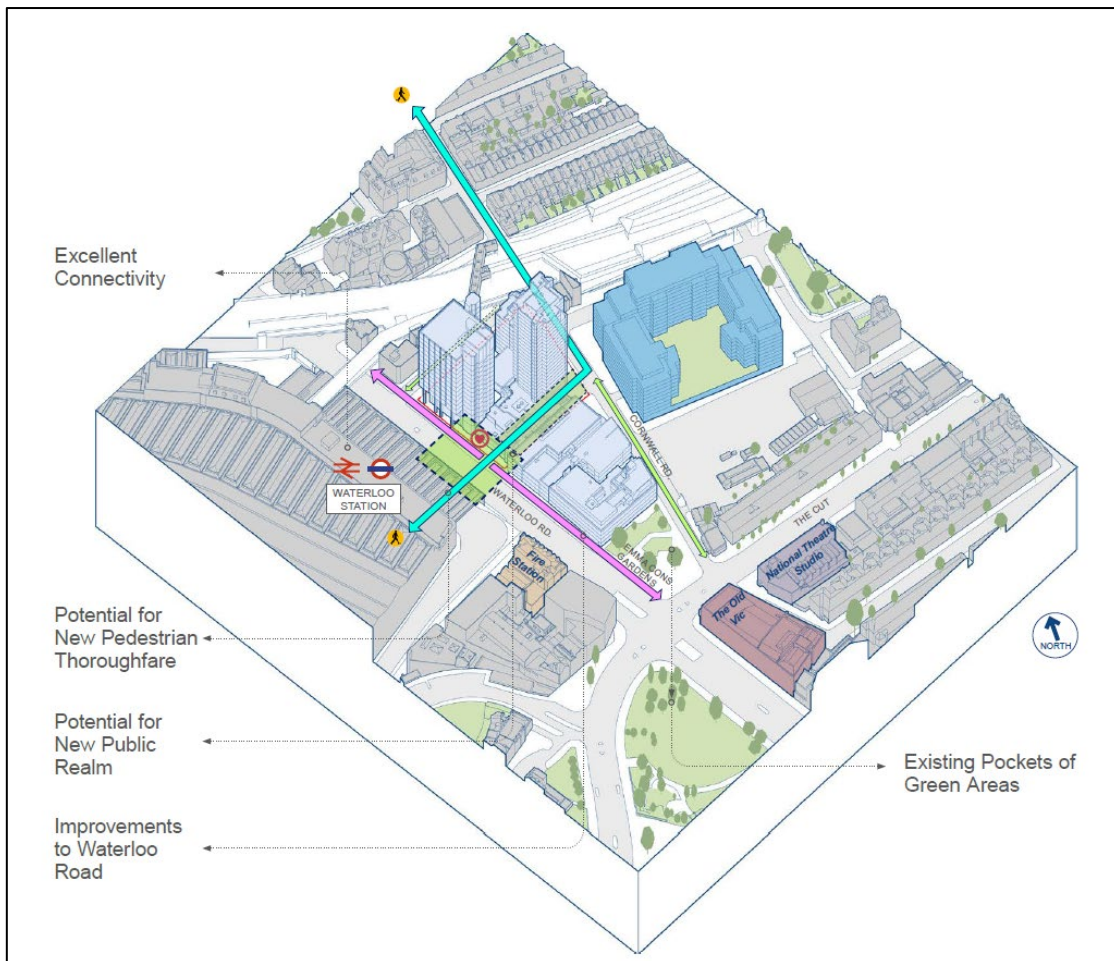
3.7.5 The strategic location of the Waterloo Triangle would suggest that a comprehensive masterplan of the 'sites' should be realised which would:

- Respect Lambeth policy in regards to tall buildings policy, protected views and Conservation Areas.
- Respect the scale and nature of The Cut and Waterloo Road and their existing heritage assets including The Old Vic (Grade II\* Listed Building).
- Maximise the development potential of this strategically important site.
- Provide good levels of sunlight / daylight to the existing and new developments.
- Ensure the future provision of daylight, sunlight and ventilation corridors to both new and existing neighbouring developments.
- Create a new public route that addresses Waterloo Station entrance.
- Improve the Waterloo Road frontage.

3.7.6 A comprehensive masterplan of the 'sites' would have the potential to and could:

- Benefit from the excellent connectivity.
- Create new public realm.
- Integrate into existing pockets of green areas within the immediate vicinity.
- Creating an arrival point for Waterloo Station in the form of a public square opposite the station entrance.
- Create a new pedestrianised route to the Roupell Street Conservation Area and the Southbank beyond.
- Help to regenerate Waterloo Road into a new vibrant area with generous public amenities, shops and restaurants.

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**Figure 16: Site opportunities for Waterloo Triangle Masterplan**

- 3.7.7 There is a real danger that this strategically important site is coming forward for development in a piecemeal fashion due to site specific circumstances and different land ownerships. To counteract this, there is a clear and pressing need for emerging development on this site to be guided by site-specific parameters that optimise the development capacity of the land while delivering key placemaking objectives and public benefits.
- 3.7.8 A cohesive masterplan approach or the allocation of the ‘Waterloo Triangle’ site would ensure a consistent and coherent design-led approach to development, providing a vital opportunity to identify clear, site-specific parameters for the type and scale of development that would encourage the delivery of the following key Local Plan placemaking objectives and public benefits for the area.
- 3.7.9 The Bourne Capital proposal is a significant missed opportunity to enhance the area particularly in terms of the delivery of better placemaking opportunities in this key strategic location adjoining one of London’s busiest transport nodes, to the detriment of the wider Waterloo area.

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#### **4. Conclusion**

- 4.1 The UJC have fundamental concerns with the planning application submitted by Bourne Capital and consider it will have a significant detrimental impact on the incredibly valuable service the UJC 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.
- 4.2 The UJC is not a hotel. It provides an essential facility which supports the armed forces community and their families and provides a 'home from home' when visiting the nation's capital. The impact on this important and historic facility, in terms of daylight and sunlight was not considered by Bourne Capital's Daylight and Sunlight Assessment, a glaring omission. As such the UJC were required to undertake their own assessment which was undertaken by Delva Patman Redler, It found that the proposed development would have a significant detrimental impact on the existing UJC facility whilst also prejudicing their ability to redevelop their freehold site in the future. The sheer scale, excessive height, mass and bulk of the proposed 20 storey building with a width of 43m increasing to 48.7m due south of the UJC would appear incongruous, overbearing and over-dominant and would result in a significant loss of amenity for the UJC.
- 4.3 The failure of the proposed development to step down in height to the south towards the Old Vic, is contrary to the Lambeth Local Plan. It would result in substantial harm to the adjoining designated heritage assets of The Old Vic Theatre, The National Theatre Rehearsal Studios and former Waterloo Fire Station. The harm to their settings would not be outweighed by the wider public benefits provided by the scheme, namely the provision of new office accommodation, and thus would be contrary to paragraphs 200 and 201 of the NPPF. The proposal would result in the removal of two retail units along Waterloo Road and provision of a new office entrance lobby, contrary to the objectives of Policy PN1 and the special policy area in which the site is located.
- 4.4 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 thus a significant missed opportunity to improve the wider Waterloo area.

Yours sincerely,

*Siofra Boyd*

For and on behalf of  
Rolfe Judd Planning Limited

Cc. Vice Admiral Sir David Steel, KBE DL, Chair, Union Jack Club  
Cc. Mr. Peter Davidson, Trustee, Union Jack Club  
Cc. Mr. Hugh Player, Chief Executive, Union Jack Club

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### **Appendix 1: Sample of Objections**

*“The Union Jack Club is patronized by the diverse military and ex-military community. It is a haven for relaxation and recuperation. It is a charitable concern and not commercially driven. It is a haven built to provide a safe space for those many veterans and members, many of whom have served their country. It should not be viewed as a commercial hotel for planning permission, because it is not”.*

*“I am a member of the Union Jack Club and I hope everyone realises what a lifesaver this club is to enlisted veterans and serving members of HM Forces. Many of us are disabled by our service, and not all of those disabilities are visible. The Jack is our home. We come here for camaraderie and care. It's a haven where we mix with others who understand our sacrifices and our service. We come here for peace and safety. While everyone talks about supporting veterans, the Jack is the one institution that actually does help us. Bourne's Capital's oppressive proposals will destroy our refuge. It will ruin our light. Veterans and serving soldiers and sailors, many of whom have PTSD, cannot be expected to be in dark and claustrophobic rooms”.*

*“The Club should not be viewed as a commercial hotel for the purpose of Planning Protection. It is the historic London 'home from home' for the British Tri-Services, enlisted military community and its purpose and impact are very different. The Club is a charity, run by a volunteer board of Trustees for the benefit of its members”*

*“As an ex member of the Armed Forces, the Union Jack Club is pivotal to ensure old comrades have a venue to meet and enjoy time together, often after a difficult period, the surroundings of central London are not the best, however by building this monstrosity next to the Club, will only add to any stress and anguish veterans have. The club also provides a venue for like minded people to socialise and have that openness, that old veterans understand, by building this office block, it will deter many from coming and therefore not supporting those who have served this country”.*

*“The UJC is a vital space for veterans and their families and associated charities. The proposed development by Bourne Capital will have a significant negative impact on the UJC which in turn will have a negative impact on the charities and people who use the UJC. One understands that BC want to redevelop the site. However as a considerate neighbour this should be in conjunction with UJC”.*

*“The council must recognize that the Union Jack Club isn't a commercial venture. It is a tri-service charity which provides accommodation at reduced rates in comfortable circumstances for non-commissioned ranks of the armed forces and veterans. In other words - ordinary servicemen and women from the working class. All serving personnel get free membership and membership for veterans is a mere £30 per year. I am a disabled army veteran and have been a member for many years and have stayed in the club on many occasions since leaving the army. I, and my wife, would be severely disadvantaged if we could no longer enjoy the club”.*

*“The UJC has stood on that spot for decades, serving veterans and service personnel from all 3 services. It is a home from home. Reunions, meetings and just catching up with old comrades all play a role in this establishment, in fact this is the role of the establishment...I am a life member of the UJC, that's how important this building is to me”.*

*“Many of those who use the Union Jack Club facilities are Armed Forces Veterans who have suffered injuries during active service that have had a significant affect on them including Post Traumatic Stress. Having been directly affected by this myself, I can testify to the fact that the proposed development will be detrimental to the health of those with similar conditions using the facilities, by it's sheer mass and*

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*dominance of the skyline cutting out daylight and being completely dominant and overbearing on the outlook from the windows of rooms on the development sides of the building. The Union Jack is indeed a place of safety and rest and recuperation in London for many who have served this Country. This proposed development in terms of its overbearing nature would have a severe and detrimental impact on the physical outlook from the rooms, the income of this unique and important Charity which by its nature and purpose supports our Service Men and Women, including those with significant disabilities”.*

*“It can not be forgotten the importance of the Union Jack Club and what it represents. Just think of the horrors that many who use this great building have seen during operations around the world whilst serving for our late Queen and now for our great King. We just want to simply stare out of the window and forget those thoughts. A monstrous building will block that great view on that side”.*

*“As a person serving in the UK Armed Forces I care about the UJC, a facility that provides a place to relax for veterans and serving personnel. This proposal will have a massive negative impact on this important function. The UJC is a charitable entity and not a commercial operation, there for the benefit of those who serve, and have served. The proposed 20-storey building is excessive in terms of its height, scale, bulk and mass and will result in a significant detrimental impact on the UJC and environment the Club provides”.*

*“The UJC is so much more than you can get from the website. It a place of safety for many, a safe space within London for those who have and are currently serving. It gives my family safety knowing where I am whilst working in London. It gives respite for others. A safe zone for those with PTSD from serving. Taking away the natural light which we know has such a positive impact on those with mental health issues, it just seems ludicrous to allow a building to block it from those most in need of this. The charity and its Royal patrons and its founders wanted and want this to be there to support our forces not tell them that commerce is so much more important than their welfare”.*

*“I have been a member of The Union Jack Club for some decades and either on my own or with members of my family I have been a frequent visitor several times a year. The Union Jack Club is not at all a 'London Club' in the sense of just an overnight facility for transient visitors to London. It is much, much more than that and has been since its' founding over 100 years ago for specific and immensely worthwhile reasons. In an increasingly hectic and demanding World, it is a place of refuge and meeting place for thousands of non-commissioned serving and ex-Service personnel and their families where they can re-unite with friends, comrades and colleagues. These are people who have served this country many of whom were wounded and/or invalided during their Service and in particular, it provides a ' safe space' for them, especially for occasions of national celebration and remembrance. To treat The Union Jack Club premises as just another London premises to be built immediately alongside on such a scale regardless of all the aforementioned circumstances would be totally dismissive of all the principals and reasons for The Union Jack Club's foundation. I hope then that you will agree in the uniqueness of The Union Jack Club being beyond price and that its' amenity is worth preserving to as close as possible as it is. Please give this matter your immediate consideration for a fundamental re-appraisal of this proposed development”.*

*“There is a growing need to provide support for the increasing amount of Veterans in the UK and the UJC is at the very heart of Veterans support. If you allow the proposed application to go through, not only will you be going against your own set criteria for redevelopment but you will also prevent any further expansion of services for Veterans by the UJC, which would be sympathetic to the area and keep to your criteria for redevelopment. The UJC is an intrinsic part of Veterans well being and should the UJC be crowded by a huge, oppressive building, it will be very damaging to the health and well being of many vulnerable veterans. We would be forever in the shadows of an ugly monstrosity that*

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*has not been thought through, regarding the catastrophic damage it will do to the UJC Charity, Veterans and the surrounding area and people”.*

*“As a disabled veteran, with a complicated home life, where my wife is my carer, I look forward to every visit to the Union Jack Club. The UJC is a place where we can come together and spend time with like minded people. The environment plays a big part in the relief that I get from my visits. The proposed build will detrimentally effect the environment of the UJC by cutting out light and making it feel claustrophobic. Please do not allow this monstrosity to be built where it will overshadow one of the only places that we, the military family, have in London”.*

*“I object to this proposal in the strongest manner. My father served, in the army, for 26 years and we used the club many times during that period. When my father was deployed overseas (Northern Ireland in the 1970's for example) we met him at the UJC when he was on R&R. Some of my happiest memories and a huge feeling of safety are connected with the UJC and it really is a "home from home" for those in the services and their families. My father is now a Chelsea Pensioner and I consider the UJC in the same manner that I consider the Royal Hospital Chelsea. Both have provided support and been their throughout for my Dad, our family, and countless others and the proposed development is a blight on this fine institution”.*

*“The presence of this club is a help to those serving in the armed forces, not only as a place to stay when in town and in need of a place to place your head, but also a huge help and support for the mental health of those serving, as we can go somewhere and fell like we're among our own kind. Helping make me feel whole and uplifting my spirits when feeling down. It's not just a club but an extension of the military family”.*

*“The Union Jack Club is the place where serving and former enlisted members of the UK's armed forces can find affordable accommodation in London. It is a place where men and women, many of whom paid a high price while serving their country, can gather together, renew old friendships and, have a base from where they can explore the surrounding area and contribute to the economy of the area. It is not a commercial hotel open to the general public, it is a forces club with specific requirements for membership. It provides the rank and file of the armed forces and their families with respite when needed, with comfort and a feeling of "family" that cannot always be found in the company of non forces personnel. It provides serving members with a safe place to wind down after an arduous tour of duty and a place where mental health can be restored”.*