

**INDEPENDENT EXAMINATION OF THE KENNINGTON, OVAL AND
VAUXHALL NEIGHBOURHOOD PLAN**

EXAMINER: Jill Kingaby BSc (Econ) MSc MRTPI

Examination Ref: 01/JK/KOVNP

Marilyn Evers
Chair
Kennington, Oval and Vauxhall Neighbourhood Forum

Byron Green
Secretary
Kennington, Oval and Vauxhall Neighbourhood Forum

Steven Heywood
Lambeth Council

Via email

23 June 2025

Dear Ms Evers, Mr Green and Mr Heywood

Following the submission of the Kennington, Oval and Vauxhall Neighbourhood Development Plan (the Plan) for examination, I would like to clarify several initial procedural matters. I also have a number of questions for the Kennington, Oval and Vauxhall Neighbourhood Forum to which I would like to receive a written response by **Monday 7 July 2025**, if possible.

1. Examination Documentation

I can confirm that I am satisfied that I have received the draft Plan and accompanying documentation, including the Basic Conditions Statement; the Consultation Statement; Strategic Environmental Assessment (SEA) Screening Report (July 2024) alongside the February 2025 Addendum to that report; the Habitats Regulations Assessment (HRA) Screening Report (February 2025); and the Regulation 16 representations, to enable me to undertake the examination.

All references in this examination will read across to the December 2023 version of the National Planning Policy Framework (NPPF). Whilst a revised NPPF was published on 12 December 2024, Paragraph 239 of that document includes transitional arrangements for neighbourhood plans, stating that the new NPPF only applies to neighbourhood plans submitted to the Local Planning Authority after 12 March 2025. As the Plan was submitted to Lambeth Council on 31 December 2024, the NPPF (December 2023) will apply.

2. Site Visit

I will aim to carry out a site visit to the neighbourhood plan once I have received response to my questions. The site visit will assist in my assessment of the draft Plan, including the issues identified in the representations.

The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

I may have some additional questions, following my site visit, which I will set out in writing should I require any further clarification.

3. Written Representations

At this stage, I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. However, I will reserve the option to convene a hearing should a matter(s) come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

4. Further Clarification

From my initial assessment of the Plan and supporting documents, I have identified a number of matters where I require some additional information from the Kennington, Oval and Vauxhall Neighbourhood Forum.

I have 16 questions seeking further clarification, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response(s) by **Monday 7 July 2025**.

5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within around 6 – 8 weeks of submission of the draft Plan. However, as I have raised a number of questions, I must provide you with sufficient opportunity to reply. Consequentially, and dependent on when you are in a position to respond, the examination timetable may be extended. Please be assured that I will aim to mitigate any delay, should it arise, as far as is practicable. The IPe office team will seek to keep you updated on the anticipated delivery date of the draft report.

If you have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter is placed on the Neighbourhood Forum and Lambeth Council websites.

Thank you in advance for your assistance.

Yours sincerely

Jill Kingaby

Examiner

ANNEX

From my initial reading of the Kennington, Oval and Vauxhall Neighbourhood Development Plan, the supporting evidence and the representations that have been made to the Plan, I have the following questions for the Kennington, Oval and Vauxhall Neighbourhood Forum. I have requested the submission of responses by **Monday 7 July 2025**, although an earlier response would be much appreciated.

Where I am requesting additional clarification, suggested text and similar, this is with a view to informing the specific terms of the any relevant examiner modifications that I may recommend. Accordingly, all of the points set out below flow from the requirement to satisfy the Basic Conditions.

Questions for Kennington, Oval and Vauxhall Neighbourhood Forum

1. Page 11 of the submitted Neighbourhood Plan (NP) refers to Local Facilities and Services (paragraphs 2.14 and 2.15). The local centres at Kennington Cross and along Kennington Park Road are referenced in paragraph 2.15, but their precise whereabouts are not illustrated in the NP. Vauxhall One (respondent to the Regulation 16 consultation exercise, reference R058) expressed a need for a clearer description of the shopping centres in the Plan area, with reference to Lambeth Local Plan policies. I understand the Forum's wish not to replicate the Local Plan but consider that added text to describe the current status of retail and service centres would, in the interests of clarity, assist readers and users of the NP.

Policy KOV3 and paragraphs 5.18-5.20 on Page 26 refer to Local shops and services, with a cross-reference to the Policy Map. This, in my opinion, is not consistent with Plan C on Page 11 which encircles, in black, an unnamed area extending south of the Policy Map area.

Can the Forum review the text on Pages 11 and 26 and the illustrations (Plan C and the Policy Map) and set out suitable amendments to describe briefly and precisely the designated local centres, and the "local shops and services" location in the NP area?

2. Page 13, paragraph 3.2 – 3.4 refers to National Planning Policy. Can additional text be provided to amend paragraph 3.4 to mention, in brief, the latest revision to the NPPF?
3. Page 17 includes Plan F: Policy PN8 of the Adopted Lambeth Local Plan for Kennington and Oval. I note that "Local Centres" are referenced in the Key, but their names and locations are hard to determine, especially as "Open Space" is also illustrated in green. Can the Forum provide an amended or replacement Plan with a clearer map, which also:
 - Names the Conservation Areas; and
 - Defines the Opportunity Areas more clearly?

Can a suitably worded cross-reference to the Air Quality Focus Areas be provided for potential inclusion in paragraphs 5.13-5.17 on Page 25?

I assume that the "NEV Opportunity Area" mentioned in paragraph 5.19 on Page 26 is the "Vauxhall, Nine Elms and Battersea Opportunity Area". Please clarify.

4. Regarding Local Green Space (LGS), the Note on Page 68 of the NP advises that the Oval triangle is not listed with the Land Registry at the time of writing. Has progress been made since then, which could lead to a change in this Note? If so, please provide a suitable update for potential inclusion in the Plan.

5. Regarding the process followed by the Neighbourhood Forum for plan preparation, and compliance with the Basic Conditions for plan-making, what is the Forum's response to Vauxhall One's (RO58) claim that the consultation has been based on pre-Covid discussions rather than more recent ones? Is it correct that consultation and the Plan are more focused on Oval and Kennington than Vauxhall?

The following questions (nos. 6 – 16) arise specifically from my reading of the Representations made pursuant to the Regulation 16 document.

6. R002 – Should Policy KOV3 refer to markets and street stalls? What were the criteria for selecting the local community assets listed in Policy KOV4, and should the Black Prince Community Centre be added? Should Policy KOV5 include views from Kennington Cross towards the Imperial War Museum?
7. R008 – Should Policy KOV5 include views along the Albert Embankment towards the Houses of Parliament?
8. R021 & 22 – Should Kennington Lane be mentioned as a Greenway? And/or, should measures to improve the route for pedestrians and cyclists be referenced?
9. R028 – Should the proposed Oval Triangle LGS be extended to include greenery around St Mark's church? Should the Sites of Community Infrastructure include the post office on the corner of Kennington Lane and Kennington Park Road?
10. R043 – Should any or all of the proposed improvements to the Oval neighbourhood, primarily related to transport, be included?
11. R047 – Regarding KOV5D, has the impact on the Wooden Spoon Site, allocated for a tall building, been fully considered?
12. R048 – Should Policy KOV5 be modified, based on comment from Historic England?
13. R049 – Lambeth Council has commented in detail on the NP. Bearing in mind that the London Borough will be making planning decisions on future applications in the NP area, please address all the points raised in its consultation response.
14. R050 – Should the NP reference the South East Marine Plan, and if so, what changes should be made?
15. R055A – Standard Securities/Rolfe Judd Planning – Please respond to their comments on Policy KOV5: Important Local Views.
16. R057 – Transport for London (TfL) made a number of comments on the NP, notably:
- Mention London Plan Policies T6, T7, D8;
 - In section 1 and KOV1, add or enhance references to access by walking, cycling and public transport;
 - Under KOV2, mention the London Plan Policy T7, TfL's London Cycling Design Standards and LTN1/20; as well as TfL's Streetscape guidance; and
 - Make changes to KOV3 and Local Infrastructure Improvements.

Should amendments to the NP be made in the light of these comments? If so, what exactly should be modified?