

Draft Kennington Oval and Vauxhall Neighbourhood Plan Regulation 16 Consultation

**Representations made
pursuant to Regulation 16**

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REPRESENTATIONS MADE BY INDIVIDUALS

Aspeling, Jane – R001

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| Title | Ms |
| First name | Jane |
| Last name | Aspeling |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I support the preservation of our green spaces and where possible the improvement of our air quality. Local communities need support and any developments should enhance and support them.</p> |

Bagshaw, Hilary – R002

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| Title | <i>(Not provided)</i> |
| First name | Hilary |
| Last name | Bagshaw |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>Thank you for the opportunity to comment on the plan. Taking each policy in turn:</p> <p>KOV 1. This states that "Proposals for development on land located within a local Green Space will only be supported in very special circumstances." I am concerned that this does not take account of the remarks made elsewhere in the documentation about the height of buildings, and shadows that may be cast upon such Green Spaces by developments immediately adjacent to the land, as well as directly on it: there should be consideration where the green amenity and its benefits would be materially affected in the negative by adjacent developments. For example, Lambeth Walk Open Space has been identified as a Green Space, yet will be (in my view) negatively impacted by the planning proposals recently approved by Lambeth Council for re-development of Denby Court, given the height of buildings, shadow, and likely loss of mature trees. Vauxhall Park is hugely overshadowed now by the skyscrapers erected over the road. The character of any space, green or otherwise, is clearly impacted by adjacent developments as well as any directly on it.</p> <p>KOV 3. There is no specific reference to markets and street stalls.</p> <p>KOV 4. What were the criteria for the selection of the Community Assets? In particular, why some pubs and not others? I note that the Black Prince Pub is a very popular amenity, a standalone older building amid newer developments, used among others by local football teams, and having featured in the film Kingsman, attracting some tourists. The Tommyfield also operates comedy sessions by Always Be Comedy, bringing well-known and newer comedians to the area to try their material, and large audiences in the process. I also wondered why the Black Prince Community Centre had not been included.</p> <p>KOV 5. I fully agree with the remarks on building height (in particular, at 5.24 on the unfortunate lack of strategy). Therefore I would support something more robust on building height in the proposals. Just considering the impacts doesn't mean that the tall buildings don't get put up anyway. It should not be good enough for developers to point to others in the area and say that, because</p> |

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| | <p>they exist, others can - it is the thin end of the wedge. While this may go beyond the scope of a Neighbourhood Plan, there should be ambition for proper, London-wide zoning, and joined-up planning, to avoid the kind of "space race" that has led to the hotch-potch at Vauxhall, and means that other developers (e.g. for the site currently occupied by DWP opposite Kennington Park, and the Lambeth Walk Open Space) aren't given free licence. They should be pressured to show more imagination about the possibilities of lower-rise properties in keeping with the early and mid-20th century flats which characterise the area.</p> <p>The vistas section only talks of preserving the views, not improving them. In my view, the Harleyford Road vista (and air quality) would be improved by a reduction in traffic, if that were possible. In any case, inclusion of the word "improvement" could be helpful.</p> <p>The vistas section is also rather Oval-centric (Oval both as Cricket Ground and wider area). Kennington Cross is identified in KOV 3 as a Local Centre, but nothing in KOV 5 about the Local View it affords, which is distinctive. Furthermore, there is nothing about the view in either direction of Kennington Cross towards the Imperial War Museum, even though it is similar (in terms of breadth, housing type, mature trees) to the view described at 5.32.</p> <p>Overall, I believe there should be more emphasis throughout the document, including KOV 1, on the importance of preserving trees , especially mature trees, for air quality, shade, and biodiversity. Or it should be spelt out that "Green Spaces" includes these if it does. New planting does not provide mitigation on a like-for-like for years to come.</p> |
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Baker, Pamela – R003

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| Title | Mrs |
| First name | Pamela |
| Last name | Baker |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | I agree with the plan as written |

Callaghan, Clare – R004

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| Title | Mrs |
| First name | Clare |
| Last name | Callaghan |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I fully agree with the plan. If anything, I would like it to go further to protect our area from ugly and inappropriate development which has seen an enormous amount of high-rise buildings with many more in the pipeline. I am very pleased with mention of protecting 4 local views (KOV5, p34). But I would like to be more. And I would like to see specific mention of protecting conservation areas from tall building development. I am pleased at the policy to protect our green spaces which are more important than ever given development and air pollution in Vauxhall (KOV2, p26). In terms of shops and facilities, I would like to see Vauxhall (and the north west end of Kennington Lane in particular) protected from any more (disproportionate) fast food chains as they are responsible for a lot of litter, evidenced by discarded branded wrappings, which is harming our area (KOV3, p28). I would also like to see a lot more done to improve air quality in our area here which is a disaster eg better road management - the location of some cycle lanes on busy A roads has concentrated other road traffic resulting in more dirt and pollution in my view (I live on a busy A road metres away from Vauxhall gyratory) (KOV2, p26). But I am very, very pleased that we will finally have a Neighbourhood Plan for our area which is a great feat in itself</p> |

Callaghan, Susanna – R005

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| Title | Mrs |
| First name | Susanna |
| Last name | Callaghan |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>KOV1: Local Green Spaces. I welcome and support KOV's designation of 10 Local Green Spaces and agree that inappropriate development on land located within a Local Green Space should only be supported in very special circumstances. Green spaces are precious and should be protected from development.</p> <p>KOV5: Important Local Views. I welcome and support KOV's identification of 4 Important Local Views and KOV's objective to protect their composition and character from harm. I particularly support their identification of Local View D: Kennington Park Road to the Elephant & Castle tall building cluster, especially in the light of the current 17 storeys tower development proposal at the junction of Kennington Road and Kennington Park Road to replace the job centre building (planning application no: 25/00794/FUL), which would adversely impact this important local view.</p> |

Cherney, Kaethe – R006

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| Title | Ms |
| First name | Kaethe |
| Last name | Cherney |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>The proposed building will block sunlight in the park, is out of character with the neighbourhood, doesn't offer sufficient affordable housing and sets a dangerous precedent that will allow more high rises to be built in a quiet residential setting. Furthermore its downright ugly and lacking in any redeeming architectural qualities.</p> |

Condon, Gregory – R007

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| Title | <i>(Not provided)</i> |
| First name | Gregory |
| Last name | Condon |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I'm a resident of the Kennington, Oval and Vauxhall area in Lambeth, and I'm currently reviewing the draft Neighbourhood Plan being put forward for our community. While the plan engages thoroughly with green space and air quality, I'm concerned that it lacks clear attention to the architectural character of the area—particularly the Georgian and early Victorian terraces that define much of the local streetscape (e.g., yellow stock bricks, flat frontages, white plaster detailing).</p> <p>There is very little in the plan about building materials, frontage rhythm, or height consistency, and I worry that this omission could lead to inappropriate development that erodes the area's historic character. But also the possibility to build density whilst respecting the local character such as Mansard Roofs.</p> <p>A current example is the proposed development at 342–344 Clapham Road, which, despite being within a conservation area, features a design that diverges heavily from the traditional Georgian style prevalent in the neighbourhood. The lack of specific architectural guidelines in the Neighbourhood Plan means there is little to prevent such incongruous developments.</p> <p>See website : https://claphamroadconsultation.com</p> <p>It's is possible to respect simple Georgian design principles that's aligned to local character whilst creating a contemporary building</p> |

Cross, James Stephen – R008

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| Title | Mr |
| First name | James Stephen |
| Last name | Cross |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>KOV 2: Improving Air Quality - Significant pollution is also caused by tourist coaches entering the neighbourhood plan area. Such coaches park up on the left-hand side of the road (Albert Embankment facing towards the Houses of Parliament). Drivers often, especially in colder weather, sit in their stationary coach with the engine running. Such tourists provide only a very limited benefit to Lambeth shops since the tourists walk towards the London Eye or cross over Lambeth/Westminster bridges to go sight-seeing on the other side of the Thames. Tourist coaches should be charged exorbitant rates to park in Lambeth to discourage them from polluting the vicinity.</p> <p>KOV 5: Important Local Views - The view down the Albert Embankment side of the River Thames towards the Houses of Parliament is view worth protecting.</p> <p>I could not see anything in the draft Neighbourhood Plan that addressed the Heritage aspects of Lambeth's infrastructure - sadly, such an important part of our historic London is simply missing.</p> <p>2. The Neighbourhood Area - Development & Design - para 2.20 states: 'Recent consultations and community engagement in the planning and design process in the KOV area have not been successful in the eyes of the local community.' This statement has particular application to the London Fire Brigade's development of its headquarters at 8 Albert Embankment. While its development of the main building which fronts onto Albert Embankment currently seems to be address the Heritage aspects tabled by the local community it has been suggested that an area of the building will be dedicated to an Events Space/ Fire Brigade Museum, the entrance/exit to which will lead straight out onto Black Prince Road. Andy Roe (Commissioner of the London Fire Brigade) anticipated that the LFB Museum alone would receive 150,000 visitors a year (per paragraph 16 of the 'LFB Museum' Project he signed on 3 April 2020). To have such a large footfall on Black Prince Road is a disaster waiting to happen. To date any attempt to have meaningful discussions with senior LFB staff has failed; external advisers front such discussions. How any development of the workshop area at the rear of the main building will progress remains to be seen but it has been uncoupled from development of</p> |

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| | <p>the main building and we may well see tower blocks appearing. Such development would serve to create 'a street canyon' inhibiting effective dispersal of pollution (see KOV 2 - Improving Air Quality: para A) as well as detrimentally affecting Old Paradise Gardens (see Appendix B: Local Green Spaces at pages 60 and 61 [iv] Old Paradise Gardens (Lambeth High Street Open Space)) which will be located extremely close by. The requirement to have meaningful discussions with the right senior people cannot be ignored - it must be emphasised. Development cannot be allowed to take place which detrimentally impacts local green spaces.</p> |
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Cull, Crispian – R009

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| Title | Mr |
| First name | Crispian |
| Last name | Cull |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | It is a mess. |

Cull, Crispian – R010

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| Title | Mr |
| First name | Crispian |
| Last name | Cull |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>As a resident of Kennington Oval for [REDACTED] I can only say how upset I am at what has become of my road due to the Kennington Re-imagination scheme.</p> <p>What an absolute mess Kennington Oval and the surrounding roads have become since the Garish Planters, and waste bins were installed. No longer are our roads swept of leaves in the winter and rubbish throughout the rest of the year. In fact the new bins are left full and overflowing without ever being collected for weeks on end, drawing far more rubbish and dog mess bags than this road ever suffered before.</p> <p>In winter the drains were all clogged up with the leaf and general litter debris and was in danger of causing flooding in the rain.</p> <p>No children have been spotted using the so called play areas, why would they, when the benches have attracted vagrants sleeping there at night and using the planters as their toilet.</p> <p>The Oval cricket ground hosts a significant number of bars selling alcoholic drinks, which are well-utilised by the thousands of cricket fans attending matches. The emptying of the stadium at the end of a well attended match is often the period when many of these quiet roads and more secluded spaces are used by the exiting cricket fans as open toilets. This has been complained about many times in the Stadium Monitoring Group meetings. The Oval have stated they can't control what happens once their audience leave their premises. However at least in the past the stadium and roads tended to revert to their quiet normality within 20-30 mins of the end of a match. The changes to our road now prolong such behaviours on match days and attracts undesirables even on non-match days, exacerbating the challenges faced by the local community. It also positively promotes noisy unwelcome crowds onto Kennington Oval throughout match days, a serious disturbance to residents in the many homes overlooking Kennington Oval.</p> <p>The claims of reducing polluting emissions through this reimagining by severely restricting access to Kennington Oval, Bowling Green Street and Clayton Street and hence to our</p> |

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| | <p>properties in this initiative seem unsubstantiated. The north side of Kennington Oval and its adjoining streets always were possibly the quietest roads in Lambeth, with minimal vehicular activity and associated emissions. Any purported reduction in emissions appears unnecessary in an area that already enjoys commendable reasonable environmental conditions. It is an absolute insult to genuine advocates of Green initiatives, to claim that this is improving any emissions figures as, if anything, whatever vehicles need to access our road at present such as refuse collection, deliveries, etc, have to take far more circuitous routes on busier roads to get to their destinations, than the previously did, resulting in higher emissions, not lower.</p> <p>I request that you give us our roads back and remove the unsightly planters, completely unused table-tennis tables, and ludicrous logs that are littering up our once peaceful and pleasant roads North of the Oval cricket ground.</p> |
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Dzwig, Sophia – R011

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| Title | <i>(Not provided)</i> |
| First name | Sophia |
| Last name | Dzwig |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>The section on Local Facilities and Services should reference the recent unfortunate closures of local primary and secondary schools (including e.g. the Archbishop Tennison's School), linked to the decline in the number of children in the area.</p> <p>The plan should refer to the importance of providing schooling for local children, to provide for existing families and to incentivise young people who live in the area to stay if they wish to have families. This will create more permanent communities representing all age groups. It will strengthen community ties and community engagement, which benefits the wellbeing of residents as well as local businesses.</p> <p>On the contrary, if young people are disincentivised from having families in the area, the population will increasingly consist of young working-age people without families, who do not set down roots but instead leave after a short period, and older residents.</p> <p>Relatedly but more generally, and in relation to "planning decisions not delivering in the best interests of the community", the plan should reference the difficulties caused by the strictness of the constraints in local conservation areas, in particular the difficulty in adding of sympathetic roof extensions to increase use of existing housing stock. This is a repeat problem for residents of the Vauxhall conservation area.</p> <p>The need to maximise use of local housing stock not only relates to the considerations above but also e.g. and to the changing use of homes where occupants may now be required to have space to work from home.</p> <p>The conservation areas are important but operate more strictly than conservation areas in other boroughs where, for example, they may be permitted subject to local consultation on the design. The conservation area guidelines for Vauxhall suggest (paras 3.11 and 3.12) that traditional mansard roofs may be acceptable but the council appears to have a blanket policy of refusing them.</p> <p>They also operate arbitrarily. The justification appears to be a desire to maintain the roofline in particular areas but this is</p> |

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| | <p>undermined by, for example, properties within the Vauxhall conservation area that have 1970s roof extensions, properties within local estates that have very recently been granted roof extensions, huge developments e.g. around Kennington Lane Tesco and the Gas Holders, and the Nine Elms development. All of these alter the local rooflines, so that the blanket refusal to grant sympathetic roof extensions on the basis of the 'existing roofline' is absurd, especially compared to the gain from having relatively low-rise and higher density housing within those areas.</p> |
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Edgington, Max – R012

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| Title | Mr |
| First name | Max |
| Last name | Edgington |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I support the plans to create safer streets with more space for active travel and play.</p> <p>It feels like there is a serious accident every few weeks in Lambeth atm, so I think schemes like this are a crucial factor at making it more safe for pedestrians and cycling a like to get around and spent time in the borough</p> |

Evers, M – R013

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| Title | <i>(Not provided)</i> |
| First name | M |
| Last name | Evers |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>Response to consultation on Kennington, Oval and Vauxhall Neighbourhood Plan</p> <p>I welcome a Neighbourhood Plan for the area and support the principle of Neighbourhood Planning specifically, in this case, in relation to Kennington, Oval and Vauxhall. I support the Neighbourhood Plan policies designed to improve air quality, protect valued green spaces and important local views and support local shops and community facilities</p> <p>This Neighbourhood Plan is welcome as a community response to the intensive development in the area and as a mechanism to ensure the Council consults closely with the community in Kennington, Oval and Vauxhall on developments in the area.</p> <p>The Neighbourhood Plan policy to protect precious green open spaces for the benefit of everyone in the diverse north Lambeth community is welcomed and supported.</p> <p>As is the Neighbourhood Plan Policy to improve air quality in the area to protect children as a priority along with all who live and work here</p> <p>Also supported is the policy which identifies, values and aims to protect community centres and other buildings which contribute to community cohesion, community life and wellbeing.</p> <p>The Neighbourhood Plan policy on protecting the character of important local views of value and significance to the area has already demonstrated its value to local residents and is warmly welcomed.</p> <p>A policy to maintain and protect useful local shops and services is also recognised as of significance particularly in the current context of pressure on traditional high street services</p> <p>As a cyclist, the aim to prioritise pedestrian, cyclist and public transport user experience of area is much appreciated.</p> <p>It is understood and welcome that the Kennington, Oval and Vauxhall Neighbourhood Plan avoids unnecessary repetition of policies between the Lambeth Local Plan and the KOV Plan, though there is a mutual, helpful inter-dependence, with the KOV Neighbourhood Plan refining and complementing the London and Lambeth Local Plans.</p> |

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| | <p>It is very welcome to understand that with the Neighbourhood Plan in place, the KOV Forum is a statutory consultee on planning applications made in the KOV area and the Forum is to be made aware of future planning applications, and that the Forum will seek to ensure that Neighbourhood Plan policies are identified and applied correctly by applicants and by officers in their decision reports.</p> <p>The policy to protect green open spaces is supported The aim of the Neighbourhood Plan to protect precious green, open spaces crucial to the health and wellbeing of local residents is welcomed and supported in response to the growing concern to the local community of the effect of the development of tall buildings on daylight/sunlight reaching neighbouring residential buildings as well as green spaces/open spaces used by the community. The KOV area has been identified as deficient in access to green space and the situation does not improve (Lambeth Open Spaces Strategy 2013, figures 9 and 10). Development pressures have meant the situation has not improved.</p> <p>The social and economic benefits of providing a good mix and density of amenities within walkable distance are widely regarded as of specific importance. This is in light of 60% of all local households having no access to the car. Developments regularly breach development plan guidance with regard to some or all of height, density and retention of employment floor space while providing little mitigating public open space.</p> <p>The policy to maintain and protect useful local shops and services is supported It is agreed that parts of the KOV area need safeguarding because of their proximity to the Nine Elms Opportunity Area. Also, that development proposals resulting in the loss of local shops will be expected to contribute to the improvement of the immediate public realm, to ensure space remains for local people to stop and rest, dwell and interact, promoting a usable, attractive and cohesive neighbourhood.</p> <p>The policy to protect and retain buildings of value to the community is important to an area under intense development pressure and is very much welcome. As a resident this community infrastructure is of great value and importance to community cohesion and wellbeing and it is good to see that the Neighbourhood Plan identifies buildings which are recognised for their heritage, cultural, economic and/or social value to the</p> |
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| | <p>community, and that proposals for the redevelopment, improvement or expansion of existing local community infrastructure to extend or diversify the level of service will be supported, provided the change will not undermine the viability of the primary use of the facility.</p> <p>The policy to protect Important Local Views is particularly welcome in an area subject to intense development and it is crucial that development proposals should not have an adverse impact on the composition and character, and respect the significance, of these Important Local Views . The Kennington, Oval and Vauxhall Neighbourhood Plan has already been cited to support the case of the local community in its objection to a proposal for an inappropriate development.</p> <p>The Neighbourhood Plan Policy to contribute to the improvement of poor air quality is a clear priority and is wholeheartedly supported</p> <p>It is recognised that the KOV area benefits from excellent transport infrastructure by road, rail, river, underground and bus. It includes Vauxhall bus station, the second busiest in London. However, a consequence of that transport infrastructure is poor air quality. Excellent public transport accessibility is reflected in very low ownership of vehicles (0.4 per household, GLA Ward Profiles 2011). The transport system in the area is at capacity and along the main road and rail tracks into central London the air quality is consistently poor, the roads often congested and noisy with not enough trees and greenery mitigating some of the negative impacts of traffic. It is also noted that London frequently exceeds EU standards for particulate matter. Reducing the use of motorised traffic by promoting walking, cycling and public transport, can combat pollution and improve inner city air quality, which would translate into improved health for residents. The provision of safer and greener routes to school is a fundamental driver of change, along with the provision of real time air quality monitoring information for the attention of children, parents, carers, teachers and the public to ensure they are aware of local air pollution to which the school and the general public are exposed. Parents, pupils and teachers should be better equipped to question and challenge the level of air pollution, take action to reduce air pollution and bring pressure to bear on local, regional and national government in terms of the regulation and legislation required to eliminate the major sources of air pollution.</p> <p>The proposals for Local Infrastructure Improvements are supported and welcome in that the scale of development proposed for the KOV area will continue to be significant over the</p> |
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| | <p>next decade. It is important that the Forum aims to work closely and collaboratively with Lambeth to determine how and where the Community Infrastructure Levy (CIL) and Section 106 planning obligation financial contributions collected in the KOV area are invested in locally supported key priorities which fulfil the policy objectives of the Plan and known to be of concern to the local neighbourhood for a long time. These include: Support for the homeless, Modern, quality library facilities, Nursery provision and school holiday childcare on our estates, Establishment of a community development trust, Air quality monitoring and improvement and increased provision of green infrastructure. Plus: Walking and cycling: The Forum will work in partnership with Lambeth Council and TfL on the delivery of initiatives to make streets pedestrian and cyclist-friendly as identified in Lambeth's Transport Strategy and Climate Action Plan</p> <p>It is most welcome that the Localism Act provides the statutory basis for Neighbourhood Plans, and enables decision-making powers at central and local government level to be devolved back into the hands of local communities.</p> <p>Consultation Statement</p> <p>The quality and quantity of consultation over many years is much appreciated.</p> |
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Farnell, Valerie – R014

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| Title | <i>(Not provided)</i> |
| First name | Valerie |
| Last name | Farnell |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I am really pleased to see a Neighbourhood Plan for the KOV area especially the policy to designate ten valued and important local green spaces to ensure that proposals in relation to these green spaces must meet the special circumstances' legal test applying to the Green Belt and Metropolitan Open Land in London. The benefits of quality green spaces in a densely populated urban area such as north Lambeth are increasingly well understood extending from air quality to mental health. Experience during the pandemic emphasised the value of open green spaces to urban communities.</p> <p>I am also really pleased to see that the KOV Plan also includes measures to contribute to the improvement of air quality, a significant concern in an area of London, featuring the Vauxhall Giratory, known to experience high levels of air pollution, It is welcome that the Plan encourages air quality improvement which will work alongside Council policies on Healthy Neighbourhoods etc, already acknowledged as helping to decrease air pollution in the Borough.</p> <p>Residents in the area are happy that the Neighbourhood Plan promotes a policy to protect from loss well used and appreciated community assets. Local libraries, community centres and several well established and vibrant public houses are identified as of particular significance to those in the KOV area. It is essential to preserve and protect them.</p> <p>The policy on protection of important local views is very welcome in order to conserve and enhance the quality, character and appearance of predominantly residential neighbourhoods, as well as areas of special architectural and historic interest</p> |

Galan, Maria – R015

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| Title | Ms |
| First name | Maria |
| Last name | Galan |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I oppose to this tower being built for it will not be for local affordable permanent housing for local families, but luxurious accommodation for students who do not necessarily help to build community as they come and go. There is plenty of students accommodation in Kennington/ vauxhall. And we need affordable housing for the families who are being priced out of the area.</p> |

Gregson, Jill – R016

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| Title | <i>(Not provided)</i> |
| First name | Jill |
| Last name | Gregson |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | I support the plan. |

Hale, Gregoryz – R017

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| Title | Mr |
| First name | Gregoryz |
| Last name | Hale |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I can whole heartedly say that I endorse the KOV neighborhood plan.</p> <p>With its 5 key policy and project priorities for future investment to the built environment.</p> <p>This plan is a shared vision for the local communities that will protect as well as promote sustainable development.</p> <p>In particular it seeks to protect local views by regulating building heights page33, 5.27.</p> <p>This is imperative if the area is to be saved from the perversions of developers who may be solely interested in profit at the expense of community values. It aims to stop and regulate such unsavoury practise.</p> <p>The KOV neighborhood plan is a cohesive template to consolidate these values for protection of the built environment.</p> <p>Also by introducing various projects under CIL (community infrastructure levy) it states and identifies the real needs of the community.</p> <p>This is critical since community engagement is imperative p. 34 5.29 and page 44. So often the people living and affected by changes are overlooked. With this NP mechanism it will allow for a better and farer way.</p> <p>By doing so the quality of this KOV area can remain of significant and meaningful statue that it so deserves.</p> |

Heukensfeldt Jansen, Suzanne – R018

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| Title | Ms |
| First name | Suzanne |
| Last name | Heukensfeldt Jansen |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I agree with the entire KOV draft Neighbourhood Plan and urge the council to adopt it in full.</p> |

Holding, Penny – R019

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| Title | Dr |
| First name | Penny |
| Last name | Holding |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>Housing - there is no section reporting on and or dealing with investment based housing developments which have vacant dwellings, and how to ensure they do not remain under-utilised in the short, medium and long term. Land use plans, to effectively manage the balance between need and limited resources (in this case land) must deal with all buildings as part of a complete and interconnected system.</p> |

Horner, Jane – R020

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| Title | <i>(Not provided)</i> |
| First name | Jane |
| Last name | Horner |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>Dear Sir/Madam, I think that having a plan to support improvements in air quality and reduce noise pollution from vehicles in Lambeth for residents and visitors is a positive development. It is not right that local children have to breathe such polluted air in our borough. The density of flats too means that protecting green spaces is very important to me.</p> |

Huntley, George – R021

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| Title | <i>(Not provided)</i> |
| First name | George |
| Last name | Huntley |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>KOV 2: Little consideration seems to have gone on the selection of the Greenways you have chosen to identify, a number of them are not especially busy pedestrian routes such as Lambeth Palace to Vauxhall and the Riverside and Kennington Road around the Imperial War Museum.</p> <p>I am very surprised Kennington Lane has not been included as a Greenway - it certainly needs to be as it is the main route from Vauxhall and Nine Elms to Kennington and onto Elephant and Castle. Huge numbers of pedestrians and cyclists use Kennington Lane every day to access work (e.g. Edinburgh House Office Block on Kennington Lane) / Home (e.g. the large Cotton Gardens Estate on Kennington Lane) / Transport (e.g. Vauxhall Station) / Shops (E.G. The large Tesco on Kennington Lane and Shops at Kennington Cross / Nursery (E.G. the Pelicon Nursey on Kennington Lane).</p> <p>It is frankly bizarre that this road has been missed out, it is the main artery going through the area this report is supposed to be about and yet it is not mentioned. Other TFL roads have been included as Greenways so that cannot be the reason. There continues to be a lot of property development on the road but none of this is actually improving the road for users.</p> <p>Kennington Lane is dangerous, polluted, narrow, congested and has no cycle lane and inadequate crossings. This situation should and could be easily resolved through small infrastructure changes and being a Greenway is an obvious first step to doing that. Pollution Levels on Kennington Lane have an outsized impact on public health vs the Greenways selected in the report due to a) the narrowness of the lane and b) the high level of use the lane gets - with so many residents and users.</p> <p>Simply put you cannot ignore Kennington Lane - it needs to be identified as a Proposed Greenway in the plan, failing to do so would be a strange oversight as this is the key artery for active travel across the report area and needs the most work of any road in the area.</p> |

Huntley, Emily – R022

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| Title | <i>(Not provided)</i> |
| First name | Emily |
| Last name | Huntley |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I don't think there is enough in this document on a few areas:</p> <ol style="list-style-type: none"> 1. There is a lack of focus on improving key routes (especially Kennington Lane / Kennington Cross) which is dangerous, highly polluted and unmonitored. It is a TFL road but this doesn't mean that this document should not seek to measure, manage, inform and control the impacts of these roads. Specifically on Kennington Lane / Cross with development there should be pavement widening. There have are ongoing 3 major developments on Kennington lane but no attempt has been made to widen the pavement or dedicate space to cycles. Safer, raised crossings should also be a key focus, as should regreening this area (Kennington cross could be much greener). The generic statement last time this was raised by someone else was that 'the strategic road network is unable to be considered within the KOV NP'. This is a dodge and misses the point. There is a huge amount that can be done outside of the main road which can be useful in improving safety on the main roads (especially Kennington Lane / Kennington Cross). Even just monitoring speeding could be used to then lobby for safer roads... Or demanding that developments go someway to improving crossings (zebra / raised crossings etc) these main roads. KOV2 should have referenced the desire to drive improvements on these key routes - Kennington Lane / Cross as a very minimum. 2. Some areas of the devoid of trees and some are overplanted. For example the Knights Walk / Cotton Gardens green space needs thinning, no light reaches the lower areas and so it is not a pleasant place for families etc to sit out. Your report inaccurately describes this area - it is underutilized by people because of the overplanting and lack of investment. This is a real shame as it could be a lot nicer. Lambeth has a myopic focus on tree planting in the wrong places. More trees need to be along (main) roads (why aren't there any by Kennington Cross?). I don't think additional trees are needed in Parks - we don't want these to become dingy shadowy spaces. People in flats want somewhere to sit out and enjoy the sunshine. 3. KOV1: Pedlars Acre Park - this is another space mentioned in your report which lacks investment or care. It has seen quite a lot |

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| | <p>of development in recent years including the input of outdoor gym facilities which are not maintained, do not all work and are not used. KOV1 should be going further and demanding that low grade / underutilised facilities are removed and spaces returned to nature. We need more investment in these smaller green spaces to make them as pleasant / open / well maintained as Kennington Park.</p> <p>4. KOV2 / Other KOVs: This does not get to grips with the issue. It references removal of parking, but does not set out what that should look like and plan for it. We should be aiming for ambitious goals to return a proportion e.g. 50% of car parking spaces to the other uses (green parklets, sports facilities, benches, trees, where we have car parks in Cotton Gardens etc - tennis courts (which are the most popular sports facility and always overbooked). There should be a plan for new developments to fund some of this, e.g. the development at 6-8 Kennington Lane could be funding turning the car park neighbouring Fontenoy Court into a Tennis court, which could drive more revenue to Lambeth Council and serve the local people much better than car spaces.</p> |
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Johnson, Rebecca – R023

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| Title | <i>(Not provided)</i> |
| First name | Rebecca |
| Last name | Johnson |
| Job title | Associate director |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>These 'neighbourhood' plans are not wanted by local residents. If you want to make driving around Lambeth impossible, you have to improve the public transport first. What is the incentive to get the bus when buses sit in standstill traffic on the main roads you have forced all cars down? I'd rather sit behind the stationary bus in the comfort of my car.</p> |

Keane, Michael – R024

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| Title | Mr |
| First name | Michael |
| Last name | Keane |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>As a local resident of the Kennington, Oval and Vauxhall area for [REDACTED], I'd like to express my full support for the KOV Neighbourhood Plan. Having been involved with the early consultation and subsequent development of the plan I know that it's a well-considered, community-led document that captures what matters most to those of us who live here.</p> <p>KOV1: Local Green Spaces Green spaces in our neighbourhood are more than just patches of grass. They are where people come together, exercise, walk their dogs, or simply take a breather. We have seen rapid changes in the area leading to increased demand on our local green spaces so protecting these spaces isn't optional, it's essential. I'm glad to see the Plan identifies and safeguards them properly.</p> <p>KOV2: Improving Air Quality Air quality is a major concern locally, especially with main roads cutting through the area. A number of locations around our area regularly breach recommended air quality levels. The Plan rightly acknowledges this and offers realistic ways to reduce pollution. Cleaner air improves health, especially for older residents, families, and people with existing conditions. It's a public health issue, not just an environmental one.</p> <p>KOV3: Local Centres A walk through any of our local centres like Kennington Cross, Oval, Vauxhall etc. will quickly reveal numerous closed businesses/shops. The centres help give the area character and offer everyday essentials but they are under threat. Supporting their vitality will make a big difference to community life. I appreciate that the Plan encourages development that strengthens rather than replaces what's already working well.</p> <p>KOV4: Community Assets From local pubs to meeting halls and libraries, these spaces hold our community together. Once they're lost, they rarely come back. The Plan's policy to protect these assets is both timely and necessary. It shows a clear understanding of how social infrastructure underpins a thriving neighbourhood.</p> |

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| | <p>KOV5: Important Local Views</p> <p>Many of the views to and from our area have already been impacted adversely by certain high rise developments. Views over to the river, across green spaces, towards historic buildings and the City help give the area a sense of place and continuity. I support their protection, especially in light of increasing pressure for high-rise development especially in any new areas that don't already have high rises.</p> <p>Overall, this Plan is rooted in local experience and guided by a clear sense of what makes our area worth living in. It's practical, balanced, and responsive to both current needs and future pressures. I hope it will be adopted and used as a framework to steer future development in the right direction.</p> |
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Khakoo, Akhtar – R025

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| Title | Dr |
| First name | Akhtar |
| Last name | Khakoo |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | I support the plan |

McConnell, Matthew – R026

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| Title | Mr |
| First name | Matthew |
| Last name | McConnell |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I'm happy with the stated aims of the Neighbourhood Plan. I think it could also a) include more substance regarding reducing private car use in the area, especially transits across it; b) discuss opportunities to increase public green space, when very tall buildings are built (and population density becomes more vertical).</p> |

McIntyre, Phil – R027

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| Title | Mr |
| First name | Phil |
| Last name | McIntyre |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I support all the policies outlined in the plan. In particular Green Spaces and Protecting Local Views and the distinctive character of the different neighbourhoods.</p> |

Monger, H – R028

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| Title | (Not provided) |
| First name | H |
| Last name | Monger |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>This is an impressive piece of work done over many years which I support.</p> <p>In terms of Local Green Spaces - I endorse those designated but wonder whether the Oval Triangle can be extended to cover the greenery around St Mark's Church which also serves as a vital resource with the area's only regular farmer's market.</p> <p>I wholly endorse the suggestions around Air Pollution.</p> <p>I would like the Post Office on the corner of Kennington Lane and Kennington Park Road to be included in the sites of Community Infrastructure/Assets of Community Value.</p> <p>In terms of the protected views - the opposite view from the Oval down Harleyford Road towards the Railway should also be protected.</p> |

Morgan, Ruth – R029

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| Title | <i>(Not provided)</i> |
| First name | Ruth |
| Last name | Morgan |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I support the KOV draft neighbourhood plan. I would also like to include the mix of shops currently getting permission ; i.e. increase of fast food chicken shops in Kennington Lane; where once we had a greengrocer, butcher , pharmacy and DIY hardware shop. Leaving local people to use large supermarkets. Please encourage small local useful shops.</p> |

Muirhead, Oona – R030

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| Title | <i>(Not provided)</i> |
| First name | Oona |
| Last name | Muirhead |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I fully support the Neighbourhood Plan's objectives to:</p> <ol style="list-style-type: none"> 1. Improve our local air quality. This is critical to the health of citizens and visitors. Poor air quality has a terrible impact on children in particular but also adults, and if we are to have a healthy population that is socially and economically active, and does not draw down resources from public services such as health and benefits, improving air quality is a very high priority. To achieve this, we must have better and more green spaces and routes - see below. 2. Protect our network of green spaces and routes. As above, green spaces not only filter our air but also are more generally vital to health and wellbeing. It is well researched and proven that access to green spaces improves mental and physical health. 3. Protect our important local views: Being so close to Westminster and other fantastic sites including heritage what we build in this neighbourhood is hugely important. Indeed Lambeth Council has recognised this: "The Kennington Conservation Area represents one of the most intact and architecturally coherent areas of architecture and townscape within Lambeth dating from the late 18th Century to early 20th century. The conservation area is considered to have London wide significance in this respect." We should protect areas that are predominantly low-rise and bound any new high rise in the existing areas around Vauxhall. The spread of high-rise into areas in and around the conservation areas should be firmly rejected. 4. Support our local shops and community facilities. The Kennington, Oval and Vauxhall neighbourhoods require both types of facilities if they are to continue to be vibrant neighbourhoods where people want to live. 5. Prioritise pedestrian, cyclist and public transport users' experience of our area. This is critical to achieve the other objectives and to provide neighbourhoods that contribute to tackling climate change, which poses a massive threat to the very existence of London. |

Neely, Clare – R031

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| Title | <i>(Not provided)</i> |
| First name | Clare |
| Last name | Neely |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>Delete PROJECT F: WALKING AND CYCLING</p> <p>Insert PROJECT F BUS PRIORITY WALKING AND CYCLING</p> <p>6.23.The Forum will work in partnership with Lambeth Council and TfL on the delivery of initiatives to maximise travel through and within Kennington Oval and Vauxhall.</p> <p>Buses, walking & cycling are the most efficient use of roads space transport modes. Space on the Transport for London Road Network , TLRN, and Lambeth Highways will be reallocated to these modes away from space for the inefficient use of roads space, single occupancy private motor vehicles, to park & drive.</p> <p>Clearway 24/7 bus priority will be installed on the TLRN and Lambeth Highways sections of the Strategic Road (bus) Network, SRN.</p> <p>Parking for deliveries & short term pick up to retail parades will located on side roads, reallocated from resident and visitor parking.</p> <p>To provide safe space to walk and cycle all side roads managed by Lambeth which are not part of the SRN or on Greenways will be on the Healthy Routes Network where through private motor traffic has been removed.</p> <p>Kerb segregated cycle tracks will be provided on the TLRN, SRN. Where insufficient roads space for bus priority and kerb segregated cycle tracks and 2 way working for inefficient use of roads space, single occupancy private motor vehicles, a single general traffic lane with tidal signals will be installed.</p> <p>Parking for hire cycles and scooters will always be on the roadway section of highways not the footway (pavement)</p> |

Revell, Richard – R032

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| Title | (Not provided) |
| First name | Richard |
| Last name | Revell |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I am pleased to support the proposed Neighbourhood Plan and think that the policy to protect green open spaces is good for the whole community. Putting more greenery around such as the plant boxes on Kennington Oval is already having benefits - it certainly brightens my day. Air quality must be improved; Living on Kennington Oval is now wonderful with the traffic restricted as I can open my windows and sit out on my balcony without the traffic fumes. The plan will improve everyone's lives.</p> |

Roberts, Andrew – R033

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| Title | Mr |
| First name | Andrew |
| Last name | Roberts |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I overall support the Objectives of the KOV Neighbourhood Plan.</p> <p>With one concern and that is that more accommodation needs to be given to low polluting vehicles including cars within the plan. Planning must include more off street car parking. We are currently seeing a erosion of parking yet increasing densities.</p> <p>I particularly support the local views - extremely important, as it's how we appreciate our areas and local green spaces objectives.</p> <p>KOV 1 - Local green spaces alongside parks are essential - preservation of BOTH is key. I support the sensible approach that considers use for this sole purpose or sports facilities.</p> <p>KOV 2 - Improving Air Quality, I support most of this however I strongly disagree with removal / reduction of on site car parking - adequate and increased off street parking (for larger scale buildings) should be encouraged by planners. We must recognise that London residents needs change at different times - essential workers require cars, elderly at certain life stages or young families. Everyone at some stage has building work or trades help at their home.</p> <p>We should encourage a mix of social and economic classes not push out certain groups or those due to a life stage that require use of their own vehicle. I think this must go hand in hand with a strong public transport system but it should not be arbitrary either or at the exclusion of low polluting cars.</p> <p>Not everywhere within or outside the city is easily accessible. I personally [REDACTED] [REDACTED] I have however [REDACTED] [REDACTED] but I need to travel [REDACTED] [REDACTED] not readily accessible by public transport. I would be driven out of the city without access to parking. We need to accommodate mixed community needs.</p> <p>I support other aspects of this policy - we now have street canyons in Vauxhall and towers must continue to be set back from the main roads in Oval and Kennington. I cannot see how these canyons are</p> |

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| | <p>good for air dispersal.</p> <p>KOV3 - local shops and services - fully support - also consider parking spaces for clean electric vehicles. This encourages local shopping and purchases.</p> <p>KOV 4 - Community Infrastructure - supported</p> <p>KOV 5 - Excellent - nowhere else does this appear in our local planning. It is critical not just for the view but for the experience created - the broad avenue feel and mid rise nature is essential. Particularly for the character and charm of those areas not over developed. Infill building along these views should be encouraged but at the same height as neighbours.</p> <p>I hope the views aspect will be taken seriously and I applaud it's inclusion.</p> <p>Please continue to use pragmatic ways for the Neighbourhood Plan to be included in planning considerations, it seems to include objectives not fully considered elsewhere in the planning process.</p> |
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Robinson, Catherine – R034

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| Title | <i>(Not provided)</i> |
| First name | Catherine |
| Last name | Robinson |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I am very happy to support the neighbourhood plan for Kennington, Oval and Vauxhall. It covers a range of issues that I feel strongly in support of such as maintaining and improving the green spaces in the area, considering the greening of streetscapes with more trees and planting, improving air quality, protecting community buildings, protecting the unique character of the area, its views and its buildings, and supporting local shops and services. Our area is vibrant, historic and beautiful, it deserves a community plan to help it stay that way.</p> |

Seaton, Andrew – R035

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| Title | <i>(Not provided)</i> |
| First name | Andrew |
| Last name | Seaton |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>In general I support the findings and recommendations in the neighbourhood Plan.</p> <p>Two aspects are of particular concern.</p> <p>First the protection and enhancement of the area's open green spaces. The area has seen massive development over the last decade. Most of this very high density, Most of it with no accompanying benefit - including in public open space - for the existing local residents.</p> <p>The remaining open green spaces have therefore become even more vital for residents' health and well-being, in providing recreation and relaxation space and a respite from the otherwise densely urban landscape.</p> <p>Increasing concerns about obesity, and about mental well-being add to the importance of maintaining the wellness benefits of these spaces. The seemingly casual permission by the local authority of developments detrimental to the well-being benefits of these spaces - including by permitting large overlooking (and in some cases visually dominant) developments adjacent to these spaces has had a major negative impact. It is critical that further such encroachment on these open spaces in this way should be avoided.</p> <p>A second area of concern relates to the lack of wider public benefit from some of the very large scale development already undertaken, and in planning, for this area. Local residents have to endure major disruption, greatly increased local pollution, and in some cases denial of access to public amenities. Yet they see no benefit from the developments, which bring nothing in respect of greater public amenities, community space, or open green space. And the relative lack of social/affordable housing in many of the developments further reduces the community benefit of these developments.</p> <p>A more holistic, community -focussed strategy to future developments in the area is essential</p> |

Shaylor, Matthew – R036

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| Title | Mr |
| First name | Matthew |
| Last name | Shaylor |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>KOV 2:</p> <p>I agree with the objective. But I think it's misleading to label this "Improve air quality". The objective only deals with transport related issues - no mention of other sources of pollution such as wood burning stoves.</p> <p>This is ok - but active travel has many benefits beyond air pollution. Let's name this objective for what it is: Promoting active travel and healthy neighbourhoods.</p> <p>KOV 5B / KOV5D:</p> <p>I don't believe these specific views have sufficient merit to be worth preserving.</p> |

Shekaran, Akshaya – R037

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| Title | <i>(Not provided)</i> |
| First name | Akshaya |
| Last name | Shekaran |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | I appreciate the commitment to green spaces, community assets and local views being protected - these are all very important to us and they should continue to be highlighted |

Snedecor, Connor – R038

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| Title | <i>(Not provided)</i> |
| First name | Connor |
| Last name | Snedecor |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | Sections 5.7-5.12, regarding development on the designated green spaces, would benefit from a further point about overshadowing. Many of these spaces are darkened and harmed already by adjacent highrise development (Pedlar's Park is a prime example), and many more proposals will be put forth. Homes for Lambeth itself wanted to put up 10+ stories on the border of Lambeth Walk Doorstep Green. Development immediately adjacent to these spaces must be modest and considered, and sunlight should not be impinged on these precious few public green spaces. This would be a sensible part of any neighbourhood plan that seeks to protect such spaces. |

Sutcliffe, James Thomas – R039

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| Title | <i>(Not provided)</i> |
| First name | James Thomas |
| Last name | Sutcliffe |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | I do not see any serious purpose in this plan: it is NOT needed! |

Truesdale, Peter – R040

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| Title | (Not provided) |
| First name | Peter |
| Last name | Truesdale |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | Overall I commend the plan to the Council. It has been worked on hard by local people. |

Ulleri, Maria Rita – R041

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| Title | Ms |
| First name | Maria Rita |
| Last name | Ulleri |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I'm thoroughly pleased that KOV exists. With so many ugly tower blocks seeming to appear regularly these days, I'm often confounded at their most unsympathetic appearance and even more that so few lights are on at night. It seems the homeless are left to perish and foreign investors positively encouraged. KOV enshrined in law gives us, that is the local community (Bonnington Square/ Vauxhall Grove) a voice. I'm hugely grateful for this</p> <div></div> |

Wigley, Andrew – R042

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| Title | <i>(Not provided)</i> |
| First name | Andrew |
| Last name | Wigley |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I am always happy to see plans which focus on improving air quality, and prioritising pedestrian, cyclist and public transport experiences.</p> <p>This plan does not go far enough in my view. London is no place for private cars. Please take decisive and immediate actions to eradicate the plague of death machines which clog our streets, run down our pedestrians and cyclists, and dump their cancerous particulates into the public breathing air.</p> <p>I do not expect cars to be banned overnight. But let this comment serve as notice that I support strong action in that direction. The stronger the better.</p> |

Woods, Robert – R043

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| Title | Mr |
| First name | Robert |
| Last name | Woods |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>Welcome KOV plan and appreciate the work which has gone into it.</p> <p>Several points relating to the Oval neighbourhood:</p> <p>1) Please can the plan call for Oval tube station to be maintained to its as-built specification with glass canopy regularly cleaned and up lights restored to working order. Reason : It's a key transport node and an out of keeping building for the area. Maintaining it to a high standard will lift the area.</p> <p>2) Call for removal of abundance of street poles/CCTV holders at junction outside Oval tube station, some large square masts housing a tiny CCTV camera. Reason : Declutter the public space in this conservation area.</p> <p>3) Consider whether a public urinal, even a pop-up facility, could be installed outside Oval Tube station? Reason : Surrounding streets suffer from public urination, especially during cricket events.</p> <p>4) Specifically for Hanover Gardens & Elias Place from the A3: These roads have been 'left behind' the street improvements applied to other areas of the Oval Low Traffic Neighbourhood. They remain important walkways to / from Ashmole School and from Tube station to broader neighbourhoods. Please can the plan include the following:</p> <p>a. Redesign entrances to these roads with pedestrian priority: continuation of paving across road and sustainable greenery / planters to lift visual appeal of entrance.</p> <p>b. Replace parking space(s) at A3 end of Hanover Gardens and Elias Place with planting / trees instead. Trees crucial to provide urban shade and reduce pollution/noise from A3. Remove or make permanent with proper tree/planting the 'parklet' on Elias Place.</p> <p>c. Move e-scooter / bike hire parking on Hanover Gardens to bike racks outside Oval Tube station. Add cycle parking rack(s) to Hanover Gardens or add cycle locking capability to heritage lampposts – cycle hanger provision limited.</p> <p>d. Consider converting parking space(s) for electric vehicle recharging, no driveways on these streets.</p> <p>Thanks!</p> |

REPRESENTATIONS MADE BY BUSINESSES

Crumpets Café / Nawalagamalaralage, Prasanna obo – R044

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| Title | Mr |
| First name | Prasanna |
| Last name | Nawalagamalaralage |
| Business name | Crumpets Café |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I have read the KOV plan and agree with its contents. I am happy with this initiative which finally gives a degree of control to us residents over how our area develops: we have been subjected to an enormous amount of development in Vauxhall in particular over the last 10 years and feel our representations have been largely ignored, and we are powerless compared with the resources and finances of the big developers. At last, we can have a meaningful say through our neighbourhood plan. I particularly support the initiatives for green spaces (KOV1). better air quality (KOV2), and protection of local views (KOV5). Well done to the team who produced this</p> |

REPRESENTATIONS MADE BY ORGANISATIONS

Bonnington Centre Community Association – R045

| | |
|---|--|
| Title | <i>(Not provided)</i> |
| First name | Clare |
| Last name | Callaghan |
| Job title | Secretary |
| Organisation | Bonnington Centre Community Association |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>I write this representation on behalf of the trustees of the Bonnington Centre Community Association (BCCA) of which I am a trustee and Secretary. The BCCA is in the KOV area. The trustees have considered the plan and support it because:</p> <ul style="list-style-type: none"> - It will have statutory weight and is a huge and important development for our community in planning terms - For the first time, the community will have a meaningful say in the type of development we do and don't want to see in our area - It offers protection against development for our green spaces - It will protect four important local views including two close to BCCA (Harleyford Road to KiaOval, and Harleyford Street to KiaOval) from intrusive development - It will safeguard by many local assets including our closest community centres, libraries and public houses - It will make developers more accountable for improving air quality and preserving Greenways before and during construction - It will give the community a say in how developer levies are spent, and identifies a number of projects which would benefit our immediate community - We also strongly support the establishment of a community development trust as outlined in the plan to ensure that such projects are delivered <p>In future, we would also like to see developers held accountable for delivering the minimum number of affordable units (35%), rather than much lower numbers or even none as so often happens today, and for delivering more social housing which is where the real housing need lies.</p> |

Environment Agency – R046

From: Bunyan, Shea [REDACTED]
Sent: 16 April 2025 15:00
To: PlanningPolicy
Subject: KOV draft Neighbourhood Plan consultation – Representation - Environment Agency
Attachments: Neighbourhood Plan Advice Note Feb 2021 (1).pdf

Good afternoon,

Thank you for consulting us on your draft Kennington, Oval and Vauxhall (KOV) Neighbourhood Plan.

Please find attached our advice for how the Neighbourhood Plan can provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the environment. The attached document sets out the key environmental issues, within our remit, which should be considered.

If you have any questions, please do not hesitate to be in touch.

Kind regards,

Shea Bunyan
Planning Advisor – South London Sustainable Places
Environment Agency | Seacole Building, 2 Marsham Street, London, SW1P 4DF

[REDACTED]
Working days: Monday, Wednesday, Thursday, Friday
Phonetic spelling: Sh-ay Bun-yun

Kent, South London and East Sussex

Neighbourhood Plan Advice Note

Updated: February 2021

Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the environment. This document sets out the key environmental issues, within our remit, which should be considered.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <https://neighbourhoodplanning.org/wp-content/uploads/Environment-Toolkit-20181220.pdf>

We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (<https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies>), and the South East River Basin Management Plan (<https://www.gov.uk/government/publications/south-east-river-basin-management-plan/>) Thames River Basin Management Plan (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf) as appropriate.

The information below explains the key issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.

Flood risk

Development must be safe and should not increase the risk of flooding.

Neighbourhood Plans should conform to national and local policies on flood risk:

If a Neighbourhood Plan is proposing sites for development please check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations.

You can view a site's flood zone on the Flood Map for Planning on our website: <https://flood-map-for-planning.service.gov.uk/>

If the proposed allocation is located within Flood Zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG): <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

Here you can determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk. This should be informed by the Environment Agency's floodmap for planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken.

It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.

We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at ksle@environment-agency.gov.uk for further details.

In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.

Climate Change Allowances

The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change.

On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

Flood Defences

Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

Thames Estuary 2100 (Tidal Defences)

In line with requirements set out in the Thames Estuary 2100 ([TE2100](#)) plan, developments in this location will need to demonstrate how the flood defence could be raised in the future to meet the demands of climate change.

No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences. In some cases we hold technical drawings of flood defence structures which may be of use. To request these you should contact our Customers and Engagement Team at ksle@environment-agency.gov.uk

Ecology

Proximity to watercourse/ Ecology

Main rivers can be viewed on the Environment Agency's map:

<https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a56386>

We normally require a buffer zone of 8 metres (fluvial) and 16 metres (tidal) between any new development and the top of the bank of the main river. The permanent retention of a continuous unobstructed area is an essential requirement for emergency access to the river for repairs to the bank and for future maintenance and/or improvement works. A buffer between new development and the river wall is also required to ensure no adverse loading which could impact the stability of the channel wall. This buffer zone will help provide more space for flood waters, provide improved habitat for local biodiversity and allows access for any maintenance requirements.

Where development is proposed next to the river we recommend that it includes a green buffer strip alongside the watercourse. Where such a buffer strip does not currently exist, we normally seek that it is established. This is a key way in which we carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have

often been degraded by past development, and we expect that any new development should go some way to redress the balance.

The provision of green infrastructure, particularly along rivers, and the inclusion of sustainable drainage techniques can help reduce the risk of flooding. This can also provide recreational and wildlife benefits. Opportunities to incorporate biodiversity in the Plan will be encouraged. In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it; delivering biodiversity net gain. We would not support development proposals if there was shown to be a likely detrimental impact on the water environment.

Water Management and Groundwater Protection

Local level actions and decision making can help secure improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive (WFD). It seeks to:

- deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and
- encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.

Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the water environment. Local WFD catchment data can be obtained from: <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/>

Overall deterioration in water quality and promoting improvement in the ecological status of any water body. Actions to achieve this are listed in the Thames River Basin Management Plan (RBMP) and the South East River Basin Management Plan <https://www.gov.uk/search?q=River+Basin+Management+Plans>

Where appropriate, a WFD Assessment (<http://planningguidance.communities.gov.uk/blog/guidance/water-supply-wastewater-and-water-quality/water-supply-wastewater-and-water-quality-considerations-for-planning-applications/>) should assess any potential impacts on the watercourse and demonstrate that the required enhancements will be delivered. Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us.

Groundwater Quality

Development must not cause pollution to the water environment.

Aquifers and Source Protection Zones

Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance:

<https://www.gov.uk/government/collections/groundwater-protection>

To see if a proposed development is located within a Source Protection Zone, please use our online map: <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

Land Contamination

You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development.

You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A list of potentially contaminated sites can be accessed on the following link:

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/198-doe-industry-profiles>

We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.

Further information can be accessed on the following links:

Guiding principles for the Land Contamination

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/192-guiding-principles-for-land-contamination-gplc>

Model Procedures for the Management of Land Contamination:

<https://webarchive.nationalarchives.gov.uk/20140328160926/http://cdn.environment-agency.gov.uk/scho0804bibr-e-e.pdf>

Approach to Groundwater Protection:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf

Water supply and foul drainage

When allocating sites in you Plan, you will need to consider if the water supply and foul drainage infrastructure can accommodate the development. Your local water company can provide further information about water supply and sewerage capacity.

Surface water drainage

The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site. The Lead Local Flood Authority, is the main contact for SUDS issues. However, we have interest in SUDS from a groundwater protection perspective and those area of critical drainage.

The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.

We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found at: <https://www.gov.uk/government/collections/groundwater-protection>

The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Infrastructure Delivery

We would recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account if the Plan looks to fund local infrastructure.

Environmental Permitting Regulations

To see if a proposed development requires an Environmental Permit under the Environment Permitting Regulations please refer to our website:

<https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit>

Under the Environmental Permitting (England and Wales) Regulations 2016, a flood risk activity permit (FRAP) may be required for work:

- in, over or under a main river;
- within 8m of the bank of a main river, or 16m if it is a tidal main river;
- within 8m of any flood defence structure or culvert on a main river, or 16m on a tidal main river.

Flood risk activities can be classified as: exclusions, exemptions, standard rules or bespoke. These are associated with the level of risk the proposed works may pose to people, property and the environment. Local Authorities should advise developers to refer to the [flood risk activity permit section](#) of gov.uk for further information.

Please note

This document is a response to a Neighbourhood Plan consultation and does not represent our final view in relation to any future planning application made in relation to any site.

You should seek your own expert advice in relation to technical matters relevant to any planning application before submission.

If you have any questions please contact the Kent and South London Sustainable Places team:

kslplanning@environment-agency.gov.uk

Guy's and St Thomas' NHS Foundation Trust / WSP obo – R047

From: Sousa-Shaheed, Reuben <[REDACTED]>
Sent: 13 May 2025 10:15
To: PlanningPolicy
Cc: [REDACTED]
Subject: KOV draft Neighbourhood Plan consultation - Representation RSS
Attachments: KOV Local Plan Reps-FINAL.pdf

Dear Sir/Madam,

Please find attached representations for the KOV draft neighbourhood plan. We request an email confirming the receipt of the representation if possible.

Kind Regards,
Reuben Sousa-Shaheed
Apprentice Town Planner

T [REDACTED]
M [REDACTED]
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Registered office: WSP House, 70 Chancery Lane, London, WC2A 1AF.

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Planning and Building Control
Lambeth Town Hall
Brixton
London
SW2 1RW

12 May 2025

Dear Sir/Madam,

We write on behalf of our client, Guy's and St Thomas' NHS Foundation Trust, to provide representations on the draft Kennington Oval and Vauxhall Neighbourhood Plan, which will form part of the local development plan that will guide future development in the area.

THE CLIENT

Guy's and St Thomas' NHS Foundation Trust ("GSTT", "the trust") is a major healthcare trust in London and the South East. The Trust is responsible for providing a variety of healthcare facilities within the London Borough of Lambeth, including St Thomas' Hospital, one of London's best known teaching hospitals. The Trust is a major employment and healthcare provider for the Lambeth community, and are pioneers in health research, providing high quality teaching and education.

The Trust has a number of properties within the KOV Neighbourhood Plan area which include:

- Riverside Sexual Health Centre, Hobart House, St George Wharf, Wandsworth Road, Lambeth, London, SW8 2JB
- Sancroft Street, Lambeth, London, SE11 5NG
- Mawbey Brough Health Centre, 39 Wilcox Close, Lambeth, London, SW8 2UD
- Wooden Spoon House, 5 Dugard Way, Lambeth, London, SE11 4TH
- Lambeth Community Care, Monkton Street, Lambeth, London, SE11 4TX

The KOV Neighbourhood Plan is therefore of interest to them.

KOV 2: IMPROVING AIR QUALITY

Policy KOV 2 aims to improve air quality in the area primarily by removing on-site car parking and restricting off-street loading. The Trust supports improvements to air quality, however, they are concerned that a blanket approach has been taken to manage these impacts. The Trust's concerns primarily relate to the operational impacts of such policies on their healthcare services because removing and restricting parking and access and deliveries results in:

- Extended journeys (including time) to and from the site, for all site users and healthcare providers which will reduce the number of patient visits that clinicians can undertake each day and impact the patients requiring transport to the site. Many patients are unable to walk or take public transport to Healthcare Centres and need to obtain Ambulance or specific transport support which requires close access to the health centre.
- Compromised drop off points to access the centre for elderly patients including Ambulance and Dial-a-Ride.
- Access for deliveries.
- General and clinical waste collection from the site.

Whilst the trust supports the intent of improving air quality, it is considered that the policy should go further to ensure that healthcare facilities/services and parking/access NHS staff are exempt from such restrictions so they can carry out the necessary day-to-day operations and successfully deliver their services.

KOV 5: IMPROVING LOCAL VIEWS

The draft KOV Plan introduces a new important local view, KOV5D 'Kennington Park Road to the Elephant and Castle tall building cluster' which appears touch the edge of their site at Wooden Spoon House, 5 Dugard Way, Lambeth, London, SE11 4TH, but it is unclear based on the scale of the plan. The site is located within Site Allocation area and identified for a tall building. The draft KOV Neighbourhood Plan may be in conflict with the SA, the Trust requests that this the extent of the viewpoint KOV5D is clarified and amended to reflect the SA.

Conclusion

The Trust's has welcomed the opportunity to provide an overview of their services and outline how such policies could impact their functions and operations. It requests that amendments are made to Policy KOV2 to ensure that their operations can be undertaken without any hindrance. It also requests clarification around KOV5D and request that it aligns with the Site Allocation. The Trust looks forward to working with the London Borough of Lambeth on these matters.

Yours faithfully



Reuben Sousa-Shaheed
Apprentice Town Planner

RSS

Historic England – R048

From: Parish, Richard <[REDACTED]>
Sent: 17 April 2025 14:53
To: PlanningPolicy
Subject: FW: Regulation 16 consultation on the Kennington, Oval and Vauxhall (KOV) draft Neighbourhood Plan
Attachments: Kennington Oval + Vauxhall reg 16 NDP consultation.docx

Ensuring our heritage lives on and is loved for longer.

historicengland.org.uk

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Subject: Regulation 16 consultation on the Kennington, Oval and Vauxhall (KOV) draft Neighbourhood Plan

Dear Planning Policy Team

Please find attached our response to the above consultation.

Richard

Richard Parish
Historic Places Adviser
London and South East Team
Historic England

Tel. [REDACTED]

By email. planningpolic@lambeth.gov.uk

Our ref: PL00350442

Telephone. [REDACTED]

16 April 2025

Dear Lambeth Planning Policy Team

Regulation 16 consultation on the Kennington, Oval and Vauxhall (KOV) draft Neighbourhood Plan

Thank you for the opportunity to provide comments on the Reg 16 draft Kennington, Oval and Vauxhall Neighbourhood Plan. As the Government's advisor on the historic environment Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the Local Plan process.

Accordingly, we have reviewed this consultation in the context of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. To this end, Historic England welcomes the production of this document.

Historic England Advice.

Historic England responded to the Reg 14 Pre-submission neighbourhood plan consultation on 26 April 2024, welcoming the draft plan and making a number of recommendations to strengthen heritage relevant policies. The Neighbourhood response to these suggestions are set out in the consultation report which accompanies the current submission. We are pleased to note the inclusion of a number of recommendations including the identification of defined viewing cones for local views which will better illustrate the key focus of the view against which any development can be judged.

Given our previous comments we do not wish to comment in detail. We do however have a number of minor recommendations in respect of policy wording that we consider would help strengthen and clarify how heritage is to be protected or enhanced.

KV05A Visual Management Guidance. We would recommend the following text is modified as follows:

*The view is sensitive to **development which affects the ability to appreciate** the scale and roofline of the buildings in the foreground and the viewing corridors along Montford Place and the western leg of Kennington Road along the northern end of Kennington Green. New development should not harm the overall composition of the view nor impinge on the viewing corridors.*

Reason – to clarify that the significance of the view is sensitive to change through encroaching development rather than sensitive to the existing context, which affords such views which allow the structure to be appreciated.

*Gas Holder No. 1 is a Grade II Listed structure of **architectural and historic merit which reflects the industrial heritage of the area, and a prominent local landmark visible in key local views.***

Reason – to better reflect the architectural and significance of the designated heritage asset.

KOV5D Kennington Park Road into the City of London

*5.35. The view of the tall buildings that characterise the growth of the city is special along the straight and perfectly aligned Kennington Park Road. **Following the alignment of the Roman Road to Chichester the view helps** visually associate the KOV area with **the London Bridge river crossing and the historic development of the City of London, key landmarks of this international city.** In seeking to comply with this policy, those designing development proposals should ensure that development in the foreground of this view must not be to the detriment of the view. There is an expectation for tall building development within the view where it extends beyond the KOV NP boundary into Southwark in accordance with Southwark Plan Policy P19, which will reinforce the contrast between the nature of Kennington Park Road within the KOV NP boundary and its tree lined streets and the city beyond.*

Reason – to help underpin the aesthetic and historic importance of this local view.

Finally, I must note that this opinion is based on the information provided by you and for the avoidance of doubt does not take precedence over our obligation to advise you on, and potentially object to development proposals which may subsequently arise from this Neighbourhood Plan and which may have adverse effects on the environment.



Yours sincerely,

Richard Parish

Historic Places Adviser

London and South East Region

Direct Dial: [REDACTED]

London Borough of Lambeth – R049

From: Carlos Gonzalez-Martos

Sent: 09 May 2025 11:49

To: PlanningPolicy

Subject: Council response to KOV Neighbourhood Plan Consultation

Attachments: KOV Reg16 draft NP - Lambeth Response - CLEAN FINAL.docx

Dear Planning Policy Team,

Please find attached Lambeth's response to the Regulation 16 Consultation on the draft KOV Neighbourhood Plan for it to be forwarded to the appointed examiner carrying out the examination of the Plan.

Kind Regards,

Carlos Gonzalez-Martos

Senior Planner – Policy

Climate, Planning and Transport – Climate and Inclusive Growth

London Borough of Lambeth

Pronouns: He/Him

Tel.: [REDACTED]

Email: [REDACTED]

Web: www.lambeth.gov.uk/planning

Lambeth Council Response to the Kennington, Oval and Vauxhall Neighbourhood Plan Regulation 16 Consultation

Policy KOV 1: Local Green Spaces

Evidence supporting the designation of Local Green Spaces

The Council consider Appendix B is not clear enough in providing evidence on the reasons for designation of the proposed Local Green Spaces as it does not specifically address the requirements in Paragraph 107 of the [National Planning Policy Framework \(December 2024 version\)](#) (the NPPF).

The Council recommends that Appendix B is formatted in a way that specifically addresses each of the three requirements included in these paragraphs for each of the proposed Local Green Spaces. A Local Green Space is required to be:

- a) In reasonably close proximity to the community it serves;
- b) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field) tranquillity or richness of its wildlife; and
- c) Local in character and is not an extensive tract of land.

Further change required – Appendix B to be formatted so it specifically addresses each of the three requirements in Paragraph 107 of the NPPF for each of the proposed Local Green Spaces.

Proposed Local Green Spaces (ix) and (x)

The Council continues to have reservations about whether the local significance of the proposed Local Green Space (ix) 'Claylands Road Open Space' can be demonstrated against the criteria included in the NPPF, which include beauty, historic significance, recreational value, tranquillity or richness of wildlife.

Similarly, the description of the proposed Local Green Space (x) 'Cotton Gardens Park' in Appendix B does not sufficiently justify its designation. It is questionable whether the presence of a picnic area in an otherwise extensive tract of land confers it the local significance required in Paragraph 107(b) of the NPPF.

Further consideration should be given to the proposed designation of Local Green Spaces (ix) 'Claylands Road Open Space' and (x) 'Cotton Gardens Park'.

Further change required – Unless a convincing justification can be provided as to why 'Claylands Road Open Space' and 'Cotton Gardens Park' meet the criteria in Paragraph 107 of the NPPF, they should be removed from the list of proposed Local Green Spaces.

Consistency across document

It is noted that the alternative name 'Lambeth Walk Doorstep Green' for local green space iii) 'Lambeth Walk Open Space, Fitzalan Street/Lollard Street' has been added between brackets in Appendix B. It is also noted that the numbering (i – x) used in the body of Policy

KOV1 is not used in Appendix B, potentially leading to confusion for applicants, members of the public and planners / decision makers.

Further changes required – For consistency and in order to avoid confusion, two changes are proposed:

1. the same alternative name should be added to the Policy KOV1 wording on page 22 of the Neighbourhood Plan, and
2. the numbering (i – x) used in the body of Policy KOV1 should be replicated in Appendix B for clarity.

Policy KOV 2: Improving Air Quality

Healthy Routes Network

It is noted that Paragraph 5.17 in the supporting text to Policy KOV 2 refers to contributions for the provision of segregated cycling infrastructure where the proposed Greenways overlap with Lambeth's Healthy Routes Network.

In order to provide all the relevant information for applicants, members of the public and planners / decision makers, it is recommended that Lambeth's Healthy Route Network, which can be found on page 2 of [Appendix A to Lambeth's Healthy Routes Plan](#), is overlaid in the KOV Neighbourhood Plan Policies Map, indicating existing routes, routes to be delivered by Lambeth and routes to be delivered in partnership with other bodies.

Further change required – Lambeth's Healthy Route Network to be overlaid in the KOV Neighbourhood Plan Policies Map.

Policy KOV 3: Local Shops and Services

Contributions relating to the loss of local shops

Part B of Policy KOV 3 states that 'Development proposals resulting in the loss of local shops will also be expected to contribute to the improvement of the immediate public realm, to ensure space remains for local people to stop and rest, dwell and interact, promoting a usable, attractive and cohesive neighbourhood'.

The goal of this part of the policy remains unclear. It is our understanding that it refers to financial contributions seeking to finance improvements to public realm elsewhere in the area designated as Local Shops and Services cluster, i.e. Kennington Cross.

If that is the case, officers consider that such a planning obligation does not meet the requirements set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (the 2010 Regulations). Such an obligation would not be directly related to nor fairly or reasonably related in scale and kind to the development.

Further change required – Given that the planning obligation required by Part B of the proposed Policy KOV 3 does not meet the requirements set out in Regulation 122 of the 2010 Regulations, this part of the policy should be removed.

Protection of post offices

Paragraph 5.19 of the supporting text refers to the aspiration to protect post offices from closure through the planning system. In the new Use Classes Order introduced in September 2020, post offices are considered to fall within the Use Class E, which includes a variety of uses formerly falling within Use Classes A1, A2, A3, B1, D1 and D2. Changes of use within Use Class E are not considered development, and therefore there is little that planning policy can do to protect existing post offices from a potential change of use within that Use Class.

Further change required: Given the limitations of the planning system to protect post offices from closure, it is recommended that the part of the supporting text that refers to post offices is removed.

Policy KOV 4: Community Infrastructure Premises

No comments.

Policy KOV 5: Important Local Views

General comments

It is advised that view location coordinates are provided as eastings and northings rather than latitude and longitude. This will ensure consistency with the way coordinates are conventionally expressed in relevant planning documents, such as the London View Management Framework Supplementary Planning Guidance and Lambeth's Draft Local Views Supplementary Planning Document.

Similarly, view cones overlaid on aerial photographs should extend beyond the subject of the view to ensure elements in the background are taken into consideration.

Three of the four view locations proposed as part of this policy (view locations for proposed designated views KOV5B, KOV5C and KOV5D) are or seem to be located on traffic islands. Officers discourage traffic islands as view location points since these are not places where one would ordinarily dwell in order to appreciate a view.

Further changes required – Three changes are proposed:

1. view location coordinates to be provided as eastings and northings,
2. view cones on aerial photographs to extend beyond the subject, and
3. view locations for proposed designated views KOV5B, KOV5C and KOV5D to be moved to locations where people would dwell, or in absence of a location where people would dwell, to a point on the main pavement.

Proposed designated view KOV5A: Kennington Road to Gas Holder №1

View location

There seems to be an inconsistency between the description of the view's subject under 'Viewing Place' on page 35 of the draft Plan (which matches the view in the photograph on page 36) and what can actually be seen from the view location coordinates provided. A view location point with the coordinates provided would not align with Montford Place.

Further change required: Please amend view location coordinates to ensure consistency with the viewing place description and photograph.

Visual Management Guidance

The Visual Management Guidance for this view refers to two 'viewing corridors along Montford Place and the western leg of Kennington Road along the northern end of Kennington Green'. However, the view cone shown on page 35 of the draft Plan does not include this leg of Kennington Road. In any case, as shown in the photograph on page 36 of the draft Plan, no viewing corridor other than that along Montford Place will be visible from the proposed view location point. In fact, the western leg of Kennington Road leads to the yard of the Beefeater Gin Distillery site, whose buildings block any long view at the end of that street.

Images 1 and 2 are extracted from VU.CITY, a third-party platform that hosts a highly accurate 3D model of London's built environment including schemes that have been granted planning permission. Image 1 shows the current status, while Image 2 shows the consented schemes known as i) 'Oval Village' (20/00987/VOC), which includes the residential building within the gasholder itself (in dark grey) and other residential buildings to the North of the gasholder (in yellow, directly to the right of the gasholder), and ii) 'Land to the East of

Montford Place' (in yellow to the far right of the image). Both schemes are currently being implemented and will add, once built, further layers of visible development to the view. In particular, the consented scheme will further block any possible long view at the end of the western leg of Kennington Road.

Image 1. Model of London's built environment showing view from proposed viewpoint before consented schemes were implemented (viewpoint as described in 'Viewing Place')



This image was produced under license by VU.CITY

Image 2. Model of London's built environment showing view from proposed viewpoint after consented schemes are fully implemented (viewpoint as described in 'Viewing Place')



This image was produced under license by VU.CITY

Further change required – Any reference to a second viewing corridor should be removed from the Visual Management Guidance section of this view. The resulting text could read as follows:

'The view is sensitive to the scale and roofline of the buildings in the foreground and the viewing corridors along Montford Place and the western leg of Kennington Road along the northern end of Kennington Green.'

New development should not harm the overall composition of the view nor impinge on the viewing corridors.'

Proposed designated view KOV5B: Harleyford Road to Oval Cricket Ground

Visual Management Guidance

The Visual Management Guidance for this view indicates that 'Proposals for buildings taller than their neighbours will generally be deemed inappropriate'. The Council considers that simply exceeding the height of neighbouring buildings would not in itself harm the composition of the view. This statement is considered too restrictive and, therefore, should be omitted.

It is stated in the Visual Management Guidance that, 'Where new buildings are deemed acceptable in principle, whether in or adjoining the conservation area, they must preserve and enhance the character and appearance of the area to maintain the setting of the view'.

The character and appearance of a conservation area are protected under conservation area policies (such as Local Plan Policy Q22 'Conservation Areas') and the NPPF and are a separate matter from the preservation of specific views. Within protected views, only those elements that make such a view significant should be protected, rather than requiring the protection of the view's wider setting.

Further changes required – The third and fourth paragraphs under the Visual Management Guidance section on page 38 should be omitted.

Proposed designated view KOV5C: Harleyford Street to Oval Cricket Ground

Visual Management Guidance

The Visual Management Guidance for this view states that 'the visual presence of the Pavilion as a focal point and destination is reliant on the scale and consistent building line of the foreground buildings'.

Further change required – The words 'reliant on' in this statement should be replaced by the words 'supported by'.

Proposed designated view KOV5D: Kennington Park Road into the City of London

Designation of view KOV5D as view of local importance

It is worth clarifying that most of the towers visible at the end of Kennington Park Road in this view are those at Elephant and Castle tall building cluster.

The Council considers that the Elephant and Castle cluster's composition cannot be readily appreciated from the view location. Furthermore, views of the Elephant and Castle cluster

along Kennington Park Road lack the demonstrable importance that would justify their designation.

There are better, visually richer and more interesting examples of townscape views of tall building clusters within the neighbourhood area. Good examples include the views of the Vauxhall tall building cluster from Vauxhall Park, South Lambeth Road or along Richborne Terrace.

The designation of view KOV5D as a protected view would therefore devalue the concept of local views designation.

Additionally, the designation of this view would, in the Council's view, unjustifiably limit development along Kennington Park Road, hindering sustainable development in the area and, therefore, not meeting basic condition (d) in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, which requires a Neighbourhood Plan to contribute to the achievement of sustainable development.

For the above reasons, the Council considers that this view should be omitted completely.

References to the City of London

If the view designation was to be included in the final version of the Neighbourhood Plan, the name given to proposed designated local view KOV5D should be changed. The title currently refers to the 'City of London'. This is despite the fact that most of the towers visible are those at Elephant and Castle tall building cluster. As the Elephant and Castle Opportunity Area's tall building cluster develops, the City of London towers may be completely screened from view within a few years. It is therefore recommended that the name of the view is changed to read 'Kennington Park Road into Elephant and Castle'.

Similarly, it is recommended that Paragraph 5.35 on page 41 of the draft Plan is amended to make clear that it is the view of the Elephant and Castle cluster that the designation of the view is seeking to protect.

Visual Management Guidance

The Description of View states that 'the view N along Kennington Park Road is framed by a consistent building line and scale of built form along both sides'. In reality, and as the guidance subsequently explains, from this view location, the right-hand side of the view is largely screened by mature trees. The first paragraph of the Description of View section on page 43 should be amended to remove the words 'both sides'.

Further change required – Given that view KOV5D lacks the demonstrable importance that would justify its protection and its designation would be likely to hinder sustainable development along Kennington Park Road, it is suggested that this view is removed from the plan.

If it is retained, the following changes are suggested:

- the name of the view should be changed to read 'Kennington Park Road into Elephant and Castle';
- paragraph 5.35 on page 41 of the draft Plan should be amended to state 'The view of the tall buildings that characterise the growth of the city is special along the straight and perfectly aligned Kennington Park Road. It helps visually associate the KOV area with one of the landmarks of this international city, the cluster of tall buildings at Elephant and Castle'; and

- the first paragraph of the Description of View section on page 43 should be reworded to read as follows: *'The view N along Kennington Park Road is framed by a consistent building line and scale of built form along ~~both sides~~ the western side. Mature tree planting is continuous along the eastern side and most of the western side. Starting from Cleaver Square this forms a shady tree-lined avenue along the northern section of Kennington Park Road.'*

Marine Management Organisation – R050

From: Marie Canny <[REDACTED]>
Sent: 12 May 2025 11:41
To: PlanningPolicy
Subject: KOV draft Neighbourhood Plan consultation – Representation Marine Management Organisation
Attachments: 250512_Kennington_Oval_Vauxhall_Neighbourhood Plan_MMO_Consultation_Response.pdf

Dear Planning team

MMO Marine Planning response to the consultation on draft Kennington, Oval and Vauxhall Neighbourhood Plan

Thank you for giving us the opportunity to comment on your draft Neighbourhood Plan. Please find our response attached.

We advise that you take note of any relevant policies within the South East Marine Plan documents in regard to areas within the Kennington, Oval and Vauxhall Neighbourhood Plan boundaries that may impact upon the marine environment. We recommend inclusion of the South East Marine Plan when discussing any themes with coastal or marine elements (including tidal extent of any river).

Our policies can be referred to as a guide, demonstrating your regard to the marine plans, under the Marine and Coastal Access Act, 2009. It is important to note that marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. please see attached for more detail.

Many thanks for the opportunity to comment.

All the best

Marie

Marie Canny (She/Her) | Marine Planner (South East) | Marine Management Organisation

Seacole Building | 2 Marsham Street | London | SW1P 4DF
[REDACTED] | [REDACTED]

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Marine
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SW1P 4DF

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Lambeth Planning Policy Team
London Borough of Lambeth
PO Box 80771
London
SW2 9QQ

Our ref: ID 692

12 May 2025

Dear Sir/Madam,

MMO Marine Planning and Marine Licensing response to Kennington, Oval and Vauxhall (KOV) draft Neighbourhood Plan

Thank you for giving us the opportunity to comment on the Kennington, Oval and Vauxhall (KOV) draft Neighbourhood Plan. The comments provided within this letter refer to the document entitled Kennington, Oval and Vauxhall (KOV) draft Neighbourhood Plan.

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the [South East Marine Plan](#) is of relevance. The plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plan was adopted June 2021, alongside the North East, North West, and South West. The South East Marine Plan covers the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.



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INVESTORS
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Bronze

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the [South East Marine Plan](#), or the [UK Marine Policy Statement](#) (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#), [Explore Marine Plans](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

Marine Licensing

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the [UK marine area](#).

The MMO is responsible for [marine licensing](#) in English waters and for Northern Ireland offshore waters.

The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

Summary notes

Please see below suggested policies from the South East Inshore Marine Plan that we feel are most relevant to your neighbourhood plan.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plan is completed:

- **SE-INF-1:** Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported.
- **SE-INF-2:** (1) Proposals for alternative development at existing safeguarded landing facilities will not be supported.
(2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities.
(3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport.
(4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) should demonstrate that they will in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate significant adverse impacts on existing landing facilities
- **SE-HER-1:** Proposals that demonstrate they will conserve and enhance elements contributing to the significance of heritage assets will be supported. Proposals unable to conserve and enhance elements contributing to the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference:

- a) avoid
- b) minimise
- c) mitigate harm to those elements contributing to the significance of heritage assets
- d) if it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets.
- **SE-SCP-1:** Proposals that may have a significant adverse impact upon the seascapes and landscapes of an area should only be supported if they demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - d) if it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascapes and landscapes of an area. Where possible, proposals should demonstrate that they have considered how highly the seascapes and landscapes of an area is valued, its quality, and the areas potential for change. In addition, the scale and design of the proposal should be compatible with its surroundings, and not have a significant adverse impact on the seascapes and landscapes of an area.
- **SE-EMP-1:** Proposals that result in a net increase to marine related employment will be supported, particularly where they meet one or more of the following:
 - i) create employment in areas identified as the most deprived, or
 - ii) support and are aligned with local skills strategies and the skills available in and adjacent to the south east inshore marine plan area, or
 - iii) create a diversity of opportunities, or
 - iv) implement new technologies.
- **SE-CC-1:** Proposals which enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate significant adverse impacts, or, as a last resort,
 - d) compensate and deliver environmental net gains in line with and where required in current legislation.
- **SE-CC-2:** Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.
- **SE-CC-3:** Proposals in the south east marine plan area and adjacent marine plan areas that are likely to have significant adverse impacts on coastal change should not be supported. Proposals that may have significant adverse impacts on climate change adaptation measures outside of the proposed project area must demonstrate that they will, in order of preference:

- a) avoid
- b) minimise
- c) mitigate the significant adverse impacts upon these climate change adaptation measures.
- **SE-AIR-1:** Proposals must assess their direct and indirect impacts upon air quality and emissions of greenhouse gases and air pollutants. Where proposals are likely to result in air pollution or increased greenhouse gas emissions, they must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate air pollution and or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements.
- **SE-ML-1:** Public authorities must make adequate provision for the prevention, re-use, recycling and disposal of waste to reduce and prevent marine litter. Public authorities should aspire to undertake measures to remove marine litter within their jurisdiction.
- **SE-ML-2:** Proposals that facilitate waste re-use or recycling to reduce or remove marine litter will be supported. Proposals that could potentially increase the amount of marine litter in the marine plan area, must include measures to:
 - a) avoid
 - b) minimise
 - c) mitigate waste entering the marine environment.
- **SE-WQ-1:** Proposals that enhance and restore water quality will be supported. Proposals that cause deterioration of water quality must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate deterioration of water quality in the marine environment.
- **SE-ACC-1:** Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, and also demonstrate the future provision of services for tourism and recreation activities, will be supported. Where appropriate and inclusive enhanced public access cannot be provided, proposals should demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate significant adverse impacts on public access.
- **SE-TR-1:** Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported. Where proposals may have a significant adverse impact on tourism and recreation activities they must demonstrate that they will, in order of preference:
 - a) avoid

- b) minimise
 - c) mitigate that impact.
- **SE-SOC-1:** Those bringing forward proposals are encouraged to consider and enhance public knowledge, understanding, appreciation and enjoyment of the marine environment as part of (the design of) the proposal.
- **SE-BIO-1:** Proposals that enhance the distribution of priority habitats and priority species will be supported. Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - d) compensate for significant adverse impacts.
- **SE-BIO-2:** Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration will be supported. Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate significant adverse impacts
 - d) compensate for significant adverse impacts.
- **SE-BIO-3:** Proposals that deliver environmental net gain for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services will be supported. Proposals must take account of the space required for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - d) compensate for net habitat loss and deliver environmental net gain.
- **SE-INNS-1:** Proposals that reduce the risk of introduction and/or spread of invasive non-native species should be supported. Proposals must put in place appropriate measures to avoid or minimise significant adverse impacts that would arise through the introduction and transport of invasive non-native species, particularly when:
 - 1) moving equipment, boats or livestock (for example fish or shellfish) from one water body to another
 - 2) introducing structures suitable for settlement of invasive non-native species, or the spread of invasive non-native species known to exist in the area.
- **SE-INNS-2:** Public authorities with functions to manage activities that could potentially introduce, transport or spread invasive non-native species should

implement adequate biosecurity measures to avoid or minimise the risk of introducing, transporting or spreading invasive non-native species.

Further points to note

We would also recommend you mention the [South East Marine Plan](#) in your Kennington, Oval and Vauxhall (KOV) draft Neighbourhood Plan.

Under the Marine and Coastal Access Act, any authorisation or enforcement decisions must be made in accordance with the marine plan. Any other decisions which may impact the marine area must have regard to the marine plan. Alongside this, you could refer to the South East Marine Plan remit which ranges from Mean High Water Springs (MHWS) or the tidal limit out to the territorial limit. This remit covers both the marine area and tidal rivers, and extends up to MHWS where there is an overlap with terrestrial planning.

We would also recommend a reference to the requirement of a marine licence for certain activities carried out within the UK marine area (as outlined in the Marine Licensing section above).

Within the Neighbourhood Plan we would recommend reference to the intertidal element of the area, particularly where both terrestrial and marine habitats have the potential to be impacted by the Neighbourhood Plan.

We would recommend you use the south east marine plan policies as evidence to support your neighbourhood plan's issues and options. This would add additional evidence to your plan and ensure alignment with the South East Marine Plan.

We deliver Marine Plan Implementation Training sessions which provided an introduction to marine planning, and I would suggest visiting the material here: [Using Marine Plans - GOV.UK](#) Please let me know if you have any questions regarding implementation of the marine plan.

As previously stated, these are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information:

[South East Marine Plan](#) and [Explore Marine Plans](#).

Yours sincerely,



Marie Canny
Marine Planning Officer (South East)

Telephone: [REDACTED]
Mobile: [REDACTED]
E-mail: [REDACTED]

National Highways – R051

From: Diana Ngobi <[REDACTED]>

Sent: 29 April 2025 08:00

To: PlanningPolicy

Cc: [REDACTED]

Subject: NH/25/10620 Regulation 16 consultation on the Kennington, Oval and Vauxhall (KOV) draft Neighbourhood Plan

FAO: Planning Policy Team, London Borough of Lambeth

Consultation: Regulation 16 consultation on the Kennington, Oval and Vauxhall (KOV) draft Neighbourhood Plan

Our reference: NH/25/10620

Dear Planning Policy Team

Thank you for your email of 25 March 2025 consulting us on the Regulation 16 consultation on the Kennington, Oval and Vauxhall (KOV) draft Neighbourhood Plan.

National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN. The closest section of our network to Lambeth borough is M4 Junction 1, approximately 10 miles west of the borough.

As the borough of Lambeth is situated some distance from the SRN, we have no comment to make on the Kennington, Oval and Vauxhall draft Neighbourhood Plan at this time.

Please continue to consult us via PlanningSE@nationalhighways.co.uk.

Kind regards
Diana

Diana Ngobi, Assistant Spatial Planner
Spatial Planning South East
National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Tel: [REDACTED] | Mobile: [REDACTED]

Web: nationalhighways.co.uk

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk
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Natural England – R052

From: SM-NE-Consultations (NE) <[REDACTED]>
Sent: 09 May 2025 07:41
To: PlanningPolicy
Subject: Consultations Response - Kennington, Oval & Vauxhall Neighbourhood Plan – Regulation 16 Consultation
Attachments: 508007 NE Response.pdf

Please find Natural England's response in relation to the above-mentioned consultation attached.

Kind regards,

Sally Wintle

Officer
Natural England
County Hall
Spetchley Road
Worcester
WR5 2NP

Tel [REDACTED]
mail to: [REDACTED]
www.gov.uk/natural-england

We strongly recommend using the SSSI Impact Risk Zones (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)
For further information on the Pre-submission Screening Service see [here](#)

Date: 09 May 2025
Our ref: 508007
Your ref: Kennington, Oval & Vauxhall Neighbourhood Plan



Hornbeam House
Crewe Business Park
Electra Way
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Cheshire
CW1 6GJ
T [REDACTED]

BY EMAIL ONLY

planningpolicy@lambeth.gov.uk

Dear Sir/Madam

Kennington, Oval & Vauxhall Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 31 March 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, [National Parks \(England\)](https://www.gov.uk/government/publications/national-parks-in-england), **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.local-environmental-records-centres.org/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Port of London Authority – R053

From: Michael Atkins <[REDACTED]>
Sent: 09 May 2025 12:25
To: PlanningPolicy
Subject: KOV draft Neighbourhood Plan consultation – Representation: Port of London Authority (PLA)

Dear Team

Thank you for consulting the Port of London Authority (PLA) on the above-mentioned regulation 16 consultation on the draft Kennington, Oval and Vauxhall Neighbourhood Plan. I have now had the opportunity to review the draft plan and associated documents and can confirm the PLA has no comments to make.

Regards
Michael

Michael Atkins
Senior Planning Officer
Port of London Authority
T: [REDACTED] | M: [REDACTED]

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Email transmissions cannot be guaranteed to be secure or error-free and Port of London Authority (PLA) does not accept any liability for any errors or omissions in the contents of this message.

Any views or opinions presented are those of the author and do not necessarily represent those of PLA.

South Bank and Waterloo Neighbourhood Forum – R054

| | |
|---|---|
| Title | <i>(Not provided)</i> |
| First name | David |
| Last name | Clarson |
| Job title | Secretary to the Steering Group |
| Organisation | South Bank and Waterloo Neighbourhood Forum |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | South Bank and Waterloo Neighbourhood Forum supports KOV's draft Neighbourhood Plan. It's themes resonate with those in our own Neighbourhood Plan and it would be good to develop these with KOV, particularly where our neighbourhood areas abut. |

Standard Securities / Rolfe Judd Planning Ltd obo – R055a

From: Sean Tickle <[REDACTED]>
Sent: 12 May 2025 11:52
To: PlanningPolicy
Cc: [REDACTED]
Subject: KOV draft Neighbourhood Plan consultation – Representation - RJP on behalf of Standard Securities
Attachments: 250512 - KOV Neighbourhood Plan - Standard Securities Representation.pdf

For the attention of Planning Policy

Please find attached a representation on behalf of Standard Securities in respect of the Regulation 16 of the Kennington, Oval and Vauxhall Neighbourhood Plan.

We would be grateful to be kept informed of the next stages of the Neighbourhood Plan.

Kind Regards

Sean Tickle / BA(Hons) Dip TP MRTPI
Director
DD [REDACTED] M [REDACTED]

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Planning Policy and Place Shaping
London Borough of Lambeth
P.O. Box 80771
London
SW2 9QQ

12th May 2025

Dear Sir/Madam,

**Kennington, Oval and Vauxhall Neighbourhood Plan – Draft Plan Regulation 16 Consultation.
Representations on behalf of Standard Securities Ltd at 409 Kennington Road, London SE11.**

We write on behalf of Standard Securities Ltd, the freeholders of 409 Kennington Road London SE11, to make representations on the Regulation 16 Version of the draft Kennington, Oval and Vauxhall Neighbourhood Plan (KOVNP).

THE SITE & BACKGROUND

The Site at 409 Kennington Road, is situated entirely within the administrative boundaries of the KOV Neighbourhood Plan (KOVNP) and is located on the northern side of Kennington Road, at the intersection where it meets Kennington Park Road (A3). The site measures 0.12 ha in size and currently accommodates a five-storey commercial building, which comprises a mix of office and job centre uses (both Class E).

The site does not contain any heritage assets nor does it lie within a conservation area although it adjoins the Kennington Conservation Area. The site is located adjacent to the Stannary Row Locally significant Industrial Site (LSIS).

Standard Securities Ltd has submitted a planning application for the redevelopment of 409 Kennington Road to deliver a mixed-use scheme comprising student accommodation ('sui generis') on the upper floors with flexible employment floorspace at ground and first floor. The proposed scheme is ground plus 16 storeys in height at the corner of Kennington Road and Kennington Park Road and steps down to six storeys on Kennington Park Road.

PROPOSED AREA FOR REVIEW

This representation seeks the review of the Local View Map associated with Policy KOV5, as well as the separate Policy Map, following changes to the KOVNP after the previous round of consultation in 2024.

Policy KOV5 ('Important Local Views') of the Draft Neighbourhood Plan previously stated:

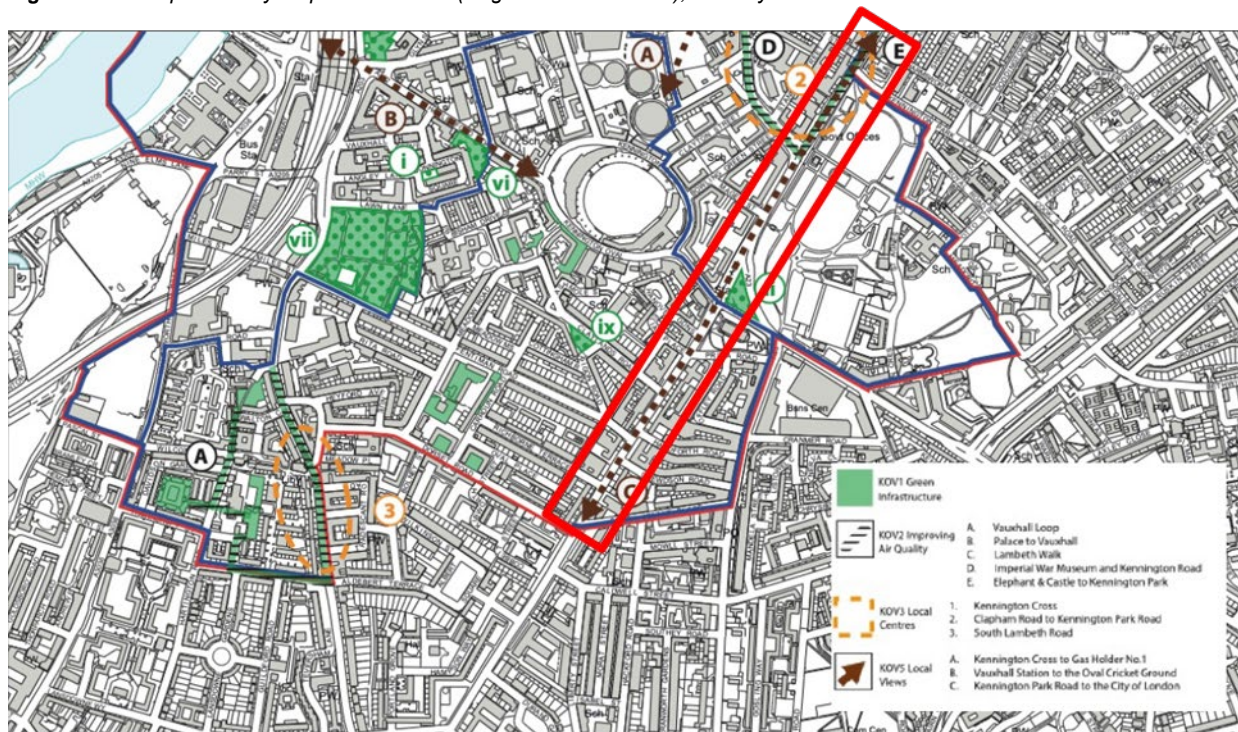
'The Neighbourhood Plan identifies the following Important Local Views, as shown on the Policies Map, to protect their composition and character from harm.'

- A. Kennington Cross to Gas Holder No.1
- B. Vauxhall Station to the Oval Cricket Ground
- C. Kennington Park Road to the City of London
- D. Development proposals that are located within or in the vicinity of an Important Local

View will be supported, provided they do not compromise foreground or midground buildings or structures that will harm an appreciation of the view or of the silhouette of any landmark buildings within the view.'

The policy wording was accompanied by a map (Figure 1) (see below), which indicated the location and extents of each of the identified views. The view along Kennington Park Road towards the City of London (Part C of KOV5) is shown via the brown dotted line, which extends along part of the road.

Figure 1 – Excerpt of Policy Map from KOVNP (Regulation 14 Version), January 2024. View C is outlined in red.



Following the previous round of consultation (Regulation 14) on the Draft Local Plan between March-May 2024, Policy LOV5 has been amended and now states:

'The Neighbourhood Plan identifies the following Important Local Views, to protect their composition and character from harm. Their viewing locations, description of view, visual management guidance and view cones are set out opposite. View cones are also shown on the larger Policy Map (pages 50-51)

- A. Kennington Road to Gas Holder No1
- B. Harleyford Road to the Oval Cricket Ground
- C. Harleyford Street to the Oval Cricket Ground
- D. Kennington Park Road to the Elephant and Castle tall building cluster.

'Development proposals should not have an adverse impact on the composition and character of these Important Local Views within the respective view cone and as outlined below.

'Proposals should provide wire line illustrations, silhouette of key assets and well-defined views to demonstrate how they will respect the significance of these views.'

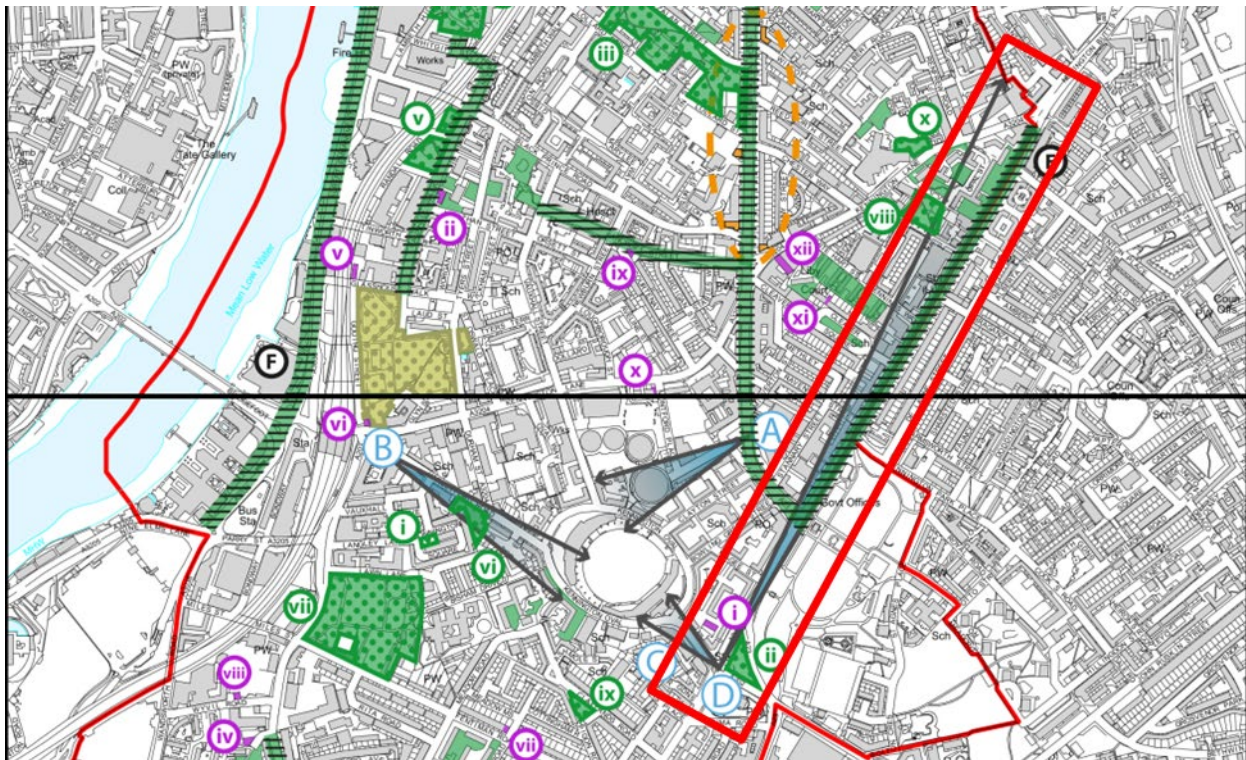
All views from the previous wording of Policy KOV5 have been revised, with the origin location of View A changing from 'Kennington Cross' to 'Kennington Road'; View B being split into two (now B & C) and the origin changing from 'Vauxhall Station' to 'Harleyford Road' and 'Harleyford Street', respectively; and the end point of View C changing from 'City of London', to 'the Elephant and Castle tall building cluster'.

The wording of the policy also now requires wire line illustrations, silhouette of key assets and well-defined views to be provided alongside any proposals within the vicinity.

The Policy Map has been revised accordingly, and the new draft version is shown below at Figure 2.

The key difference between the previous and current version of the map is that the viewpoint from Kennington Park Road (View D on the map at Figure 2) has shifted northwards along the road and now comprises a 'cone' shape rather than a straight line. As a result, the KOVNP now proposes to include several properties within the view cone, to the north-western side of Kennington Park Road, between Oval Station and towards the Elephant and Castle tall building cluster (up to the edge of the KOV administrative boundary).

Figure 2 - Excerpt of Policy Map from KOVNP (Regulation 16 Version), December 2024. View D is outlined in red.



The supporting text of Policy KOV5 provides additional analysis of the views, including a viewing place, a dynamic viewing location, a description of the view, and visual management guidance. Photos are also provided showing the relevant view from the identified 'Viewing Place'.

For View KOV5D, the following additional information is provided:

'Viewing Place'

On Kennington Park Road at the junction with Harleyford Street outside the Oval tube Station.

'Viewing Location

A dynamic view as the viewer moves N along Kennington Park Road with the tall building cluster providing a landmark focal point.

'Description of View

The view N along Kennington Park Road is framed by a consistent building line and scale of built form along both sides. Mature tree planting is continuous along the eastern side and most of the western side. Starting from Cleaver Square this forms a shady tree-lined avenue along the northern section of Kennington Park Road. The combined effect of the road's alignment, the building line and scale of the built form, and the landscape features is to create a vista in which the tall building cluster is the focus. This is an unfolding view with changing glimpses above and through the tree line of the blocks and their alignment right up to the area's northern boundary at Newington Butts where the cluster is fully revealed and is the dominant feature. The view provides orientation and accentuates the local sense of place along Kennington Park Road by maintaining visual links with the tall buildings cluster landmark.

'Visual Management Guidance

The view is sensitive to the consistent building line, scale of built form and tree line along Kennington Park Road. New development should not harm the overall composition nor compete with the tree line or the tall building silhouettes against clear sky.'

The Google Streetview image provided to identify the 'Viewing Place', dates from June 2024 and is shown at Figure 3 below.

Figure 3 – Google Streetview Image showing View D from Kennington Park Road towards the Elephant and Castle tall building cluster. This viewpoint is taken from a vehicle travelling northwards.



REPRESENTATION ON THE DRAFT NEIGHBOURHOOD PLAN DOCUMENT

Misleading imagery and incorrect viewing location

Draft Policy KOV5 of the KOVNP seeks primarily to identify 'important' local views, in order to 'protect their composition and character from harm'. It goes on to state that development proposals should not have an adverse impact on them, with proposals required to demonstrate how they will respect their significance.

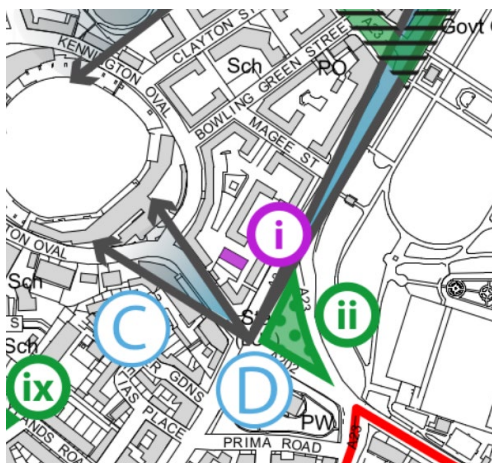
Supporting paragraph 5.25 notes that the views identified within the policy are considered by local people as 'important in helping define the character of the KOV area. Paragraph 5.27 then goes on to recognise that 'the KOV area consists of and/or is visually connected to a number of notable townscapes, buildings and structures both old and new'. It considers that maintaining visual links with those landmarks is considered important, connecting different parts of the neighbourhood particularly for those on foot, cycling and using public transport.

Supporting paragraph 5.35 is specific to View KOV5D, which as stated above extends from Kennington Park Road towards the Elephant and Castle tall building cluster. The paragraph states that:

'The view of the tall buildings that characterise the growth of the city is special along the straight and perfectly aligned Kennington Park Road. It helps visually associate the KOV area with one of the landmarks of this international city. In seeking to comply with this policy, those designing development proposals should ensure that development in the foreground of this view must not be to the detriment of the view.'

The Viewing Place is identified as junction of Harleyford Street and Kennington Park Road, outside of Oval Station. However, the image provided within the KOVNP (as at Figure 3 above) is not representative of this location, as it is taken in the middle of the road in a position that would not be experienced by anybody travelling along the road by foot or by cycle. Even users of buses are unlikely to perceive the view clearly. Furthermore the image itself is a Google Street view image, which are by their very nature distorted and taken from a moving vehicle. This highlights a concern that no proper assessment of the view has been undertaken in the preparation of the KOVNP.

The position of the image and the policy map suggests that the viewer is either in the middle of the road or stood on the traffic island between the two carriageways. An extract from the Policy map is below. As can be seen from this map and the subsequent OS plan below showing the actual location, the view in the KOVNP is shown from the wrong location.



While pedestrians use this traffic island to cross the road, this journey is likely to be very brief with the sole aim of getting from one side to the other, with the focus likely on the pedestrian crossing lights ahead of them, or the waiting traffic. This location is not considered to be the optimum position whereby street users will be taking in the views towards the tall building cluster. Indeed, the identified Viewing Location notes that this will be a 'dynamic view as the viewer moves N along Kennington Park Road'.

The view's coordinates are 51°28'55.04"N 0° 6'44.96"W and an image taken from these coordinates is shown at Figure 4 below. This is taken from the edge of the footpath outside of Oval Station, close to where it meets the cycle way. For people travelling north along Kennington Park Road from the identified Viewing Place, this is more representative of how they would actually experience the view towards the tall building cluster.

In addition to a revised location of the view, the 'cone' which is shown on Fig 2 above should not be extended along Kennington Park Road. Unlike assessments undertaken in the LVMF and through Lambeth's own local views, the view has not been professionally assessed and the extent of the cone's width and the length of the view are not based on any townscape analysis which has been presented. As can be seen from Fig 4 below when taken from the location outside of Oval Station the cone is not relevant to the view and highly obscured by existing trees. Whilst the photographs are taken with full leaf cover, during the winter the large London Plane trees on the western side of Kennington Park Road will continue to obscure the view. Furthermore, the tall buildings in the Elephant and Castle are located across a wider area than the narrow focus of the cone.

Figure 4 – Representative view from junction of Harleyford Street and Kennington Park Road, towards the E&C tall building cluster (source: photograph taken by author, April 2025).



The image below is an ordnance survey map indicating the location of the view (and coordinates) outside of Oval Station at the corner of Clapham Road and Harleyford Street (blue circle).

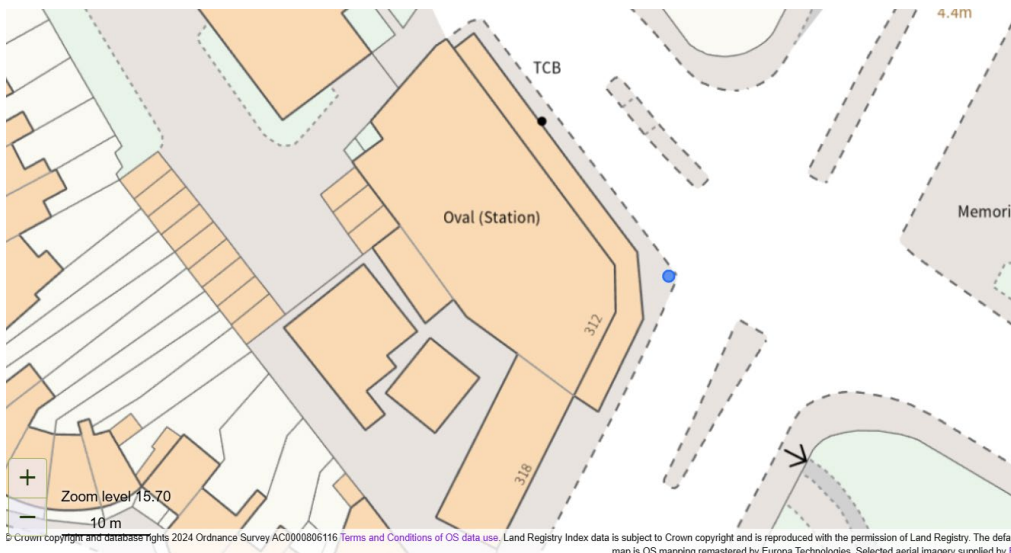


Figure 5 – Ordnance Survey Plan

The basis for the inclusion of the view is incorrect

Notwithstanding the need to correct the photography, highlight the correct view location in the Policy Map and remove the cone, Standard Securities consider the whole basis for the inclusion of View D from Oval Station should be challenged. The view is noted as follows:

The view of the tall buildings that characterise the growth of the city is special along the straight and perfectly aligned Kennington Park Road. It helps visually associate the KOV area with one of the landmarks of this international city. In seeking to comply with this policy, those designing development proposals should ensure that development in the foreground of this view must not be to the detriment of the view.'

As noted previously the reason for the views is to 'protect their composition and character from harm'. It is not clear why this view is important and what character it is seeking to protect. The tall buildings which are the focus of the view are located within the Elephant and Castle which is an Opportunity area in the London Borough of Southwark. Vauxhall directly to the west of Oval is also an Opportunity Area with extensive tall buildings but no similar view is proposed along Harleyford Road to the west of the Oval Cricket Ground towards the tall buildings in Vauxhall, despite this being in the KOVNP. The view is not identified in the Council's Local Plan nor the recent revised draft Lambeth Local Views SPD.

Development is on-going in the Elephant and Castle with very tall buildings being permitted across a wide area. Although certain buildings in the city were previously visible, these are being obscured by on-going development in the Elephant and Castle with further very tall buildings recently permitted at Borough Triangle (44 and 36 storeys).

We note that the other three views in the KOVNP (A to C) are to specific local landmark locations (The Oval and the listed gas holder at Oval Village). The buildings which are built or being erected at Elephant and Castle are not specific landmarks nor do such buildings highlight a specific function or locality. The buildings at the Elephant and Castle (unlike The Oval and listed gasholder) are not local heritage assets and are not specifically centred on Kennington Park Road. It is not clear what wayfinding or landmark role such tall buildings provide other than they are partially visible from Oval Underground Station. It is unlikely that people at Oval Station would use tall buildings as a 'Wayfinder' to walk or cycle to the Elephant and Castle in the same way as it is unlikely that someone walking along Harleyford Road to the west of The Oval would use the

tall buildings in Vauxhall as a Wayfinder.

This view is neither protecting an important vista nor local heritage assets, it is an artificial view which is seeking to limit development for no clear planning purpose. No recognized townscape analysis or methodology has been undertaken to support the view or viewing corridor and the views are not protected in Lambeth's Local Plan 2021 as local views. Furthermore as noted previously the photography used to support the view is taken from Google Street view and the photography and maps are taken from the wrong location. Given the presence of large trees on the western side of Kennington Park Road the view from the correct location is limited.

On this basis it is not clear what harm could be considered to occur to the character of the area through buildings being constructed in the view and how such buildings would be to the detriment of the view as no character has been placed on the view and the view is not protecting a special vista.

If standing at Oval Underground Station there are more important local wayfinding locations which are visible and which are much more important to visitors to the area. Firstly Oval Underground Station is the key station for visitors to The Oval Cricket Ground with tens of thousands of visitors every year going from the station to the ground. This is rightly identified in View C. Secondly Kennington Park is the major recreational and leisure space within the area and a major destination for people arriving at Oval Station either taking part in a number of sports activities which occur there or just enjoying the park.

409 Kennington Road – Interaction with View D

Notwithstanding the above points, Standard Securities Ltd are keen to ensure that their proposed development at 409 Kennington Road respects the proposed protected view and does not conflict with the reasons for its designation within the draft KOVNP.

Montagu Evans were instructed to undertake a Heritage and Townscape Visual Impact Assessment (HTVIA), part of which assessed the views along Kennington Park Road, both to the north towards the tall building cluster and to the south. This HTVIA was prepared using industry methodologies and based on the professional judgement of Montagu Evans, who are well respected townscape and heritage consultants.

The HTVIA concluded that the composition and character of the views along KPR would remain unaffected by the proposed development. Management guidance for the view is provided within the HTVIA as follows:

'The view is sensitive to the consistent building line, scale of built form and tree line along Kennington Park Road. New development should not harm the overall composition nor compete with the tree line or the tall building silhouettes against clear sky.'

Standard Securities Ltd have worked closely with Lambeth Council and the GLA from an early stage and have worked hard to bring forward a scheme that is successfully broken up, with a podium and main element that enhance the overall composition and do not compete with the tree line and the silhouette. The proposed scheme as submitted would continue to allow views along Kennington Park Road to be appreciated. Whilst it may obscure certain tall buildings these are not landmarks and a significant number of other buildings in the area would remain clearly visible. Thus no harm can be attributed to a development in the view as the landmark or wayfinding role of the tall building cluster (as suggested in the KOVNP) remains.

FAILURE TO MEET BASIC CONDITIONS

We consider the KOVNP does not meet the Basic Conditions for the following reasons:

Condition A: The references in the KOVNP are to an earlier version of the NPPF but the reference in the Basic Conditions Statement by OHN to para 132 of the NPPF (now Para 133) is

“This Policy identifies four locally important views to ensure that development responds to and respects local character. This support §132 of the NPPF in achieving well-designed and beautiful places by reflecting “local aspirations [which] are grounded in an understanding and evaluation of each areas defining characteristics.”

In according with §135 c), this Policy seeks to ensure developments” ‘are sympathetic to local character and history, including the surrounding built environment’ as well as aligning with §196 through identifying these key views, which highlight the “the desirability of new development making a positive contribution to local character and distinctiveness’ and ‘opportunities to draw on the contribution made by the historic environment to the character of a place’ (§196, c and d)” (our underlining)

As noted previously no assessment of local character or distinctiveness has been made for why View D should be included in the Plan. There is no relevant history or local character which the view reflects, and the suggested landmarks are merely recently constructed tall buildings within an opportunity area in another borough. We note that Southwark Council objected to View D on the basis it could have a bearing on decisions made by them as an LPA. We further note that Historic England recommend the view be undertaken in line with their guidance.

Condition A is thus not met.

Condition D: We note the OHN report states that:

This Policy seeks to ensure the local character of the neighbourhood area is recognised and protected through the safeguarding of landscape views which are highly valued by the community. Identifying key landmarks and buildings which are seen in the area create a sense of place which adds to the cohesion of the community, thus having a positive social impact. Protecting the built and historic environment is important locally. There is a positive environmental and economic effect in seeking to preserve and prevent the erosion of local views which, if lost would undermine the character and visual connections of the area.

As noted previously View D does not reflect key landmarks and the buildings in the Elephant and Castle are not within the London Borough of Lambeth and outside of the KOVNP. Nor is there evidence that this view is highly valued by the local community. There is no evidence therefore that View D would have a positive social impact and any development in this view would not undermine the character and visual connections of the area. Condition D is therefore not met.

Condition E: In terms of compliance with London Plan and Local Plan policy the OHN document states that

This Policy is in accord with and provides local context to, London Plan Policy HC3 (Strategic and Local Views) and HC4 (London View Management Framework) in identifying three important local views to ensure future development does not harm the appreciation of the view or the silhouette of landmark buildings within the view. This Policy also complements Local Plan Policy Q25 (views) which seeks to protect the general composition and character of views of local interest, from harm.

The policy recognises and is set out in the same format, as the revised draft Lambeth Local Views SPD, incorporating viewing points, view cones, co-ordinates and view assessment. The Policy also accords with Lambeth Local Plan Policy Q26 (Tall and Large Buildings) Q5 Local Distinctiveness, PN2 (Vauxhall) and PN8 (Kennington/Oval) It is acknowledged that a small element of the View D viewing cone sits within the Borough of Southwark and as such Southwark Plan (2022) Policy P17 (Tall Buildings) applies within this area. In order to ensure the policy does not conflict with this KOV 5 view D applies within the area shown on the policies map and as detailed on the View D viewing place which is within the KOV neighbourhood area and Lambeth Borough area. It is anticipated that P17 will ensure exemplary architectural design to complement the existing landmark of the Elephant and Castle tall building cluster on the eastern edge of this view.

The Council in its Local Plan 2021 assessed a range of important local views which are referenced in Policy Q25 and highlighted in the revised draft Lambeth Local Views SPD. In all views the landmarks are of major national heritage significance or local heritage significance, including major vistas towards key features in the townscape. This includes Houses of Parliament, Battersea Power Station and the BT Tower. The key Landmark Silhouette Chapter of the SPD (Part 3) demonstrates the methodology used to identify and characterise the views. None of this approach is present in the KOVNP. It cannot therefore be correct that the approach is in line with Policy Q25 nor emerging SPD.

Secondly View D has not been identified as being an important view in the detailed assessment undertaken by the Council of important local views in its Local Plan or emerging SPD. Condition E is thus not met.

HOW THE BASIC CONDITIONS COULD BE MET

We consider that View D should be deleted.

View D does not have a wayfinding role nor highlights any key landmarks or local heritage assets; it merely highlights a series of recently constructed tall buildings in the Opportunity Area at the Elephant and Castle; development which is ongoing over a wide area and in another London Borough. The Oval Cricket Ground and Kennington Park form much more important destinations at Oval Station.

No analysis of the character the view is purported to be protecting, has been presented and no technical assessment of the view undertaken using recognized townscape and heritage assessments. As a result any 'harm' through buildings being built in the foreground or middle ground of the view cannot be assessed as it is not possible to determine what character the view is trying to protect and any attempt to do so would be merely subjective. The view is not identified in the Council's Local Plan nor the recent revised draft Lambeth Local Views SPD.

However, if it is considered that View D should be retained in the KOVNP we would recommend:

- (a) That the viewpoint is assessed through a professional assessment undertaken by a recognized townscape and heritage consultancy and undertaken in line with industry best practice.
- (b) The origin point of View D is amended on the revised KOVNP Policy Map, to better align with the description of the 'Viewing Place', positioned outside of Oval Station (see previous maps). This will ensure it provides a better representation of how most pedestrians and footpath users would experience the view towards the Elephant and Castle tall building cluster.
- (c) We recommend replacing the photograph of View D with the image similar to that provided at Figure 4 above but professionally taken and correctly surveyed so that it can be reproduced in future planning applications. This photograph (which reflect the coordinates for View D) has been taken from the location referenced within the description of the 'Viewing Place' (i.e. outside Oval Station) and again is more representative of how the majority of pedestrians and other footpath users will perceive this

view.

- (d) The cone is removed from the Policies Map and the view reverts to that shown in the Regulation 14 version of the KOVNP as a line indicating the view north.

The removal of View D, which is unnecessary and untested, will ensure the Neighbourhood Plan is sound and the basic conditions met. However, if View D were retained, the above proposed amendments will ensure that it is representative of the key location of those walking and cycling and using public transport within the area. It will ensure that there are no unnecessary restrictions placed upon potential development sites that will deliver much-needed benefits for the Borough and surrounding area, such as the site at 409 Kennington Road.

SUMMARY

We trust the above representation will be taken into consideration. Should you have any questions, please do not hesitate to contact the undersigned.

Yours faithfully

Barney Ray

Rolfe Judd Planning

For and on behalf of

Standard Securities Ltd

Standard Securities / Rolfe Judd Planning Ltd obo – R055b

| | |
|---|---|
| Title | Mr |
| First name | Sean |
| Last name | Tickle |
| Job title | Director |
| Organisation | Rolfe Judd Planning Ltd |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | Please see letter sent to planningpolicy@lambeth.gov.uk which forms the representation by Standard Securities Ltd. |

Swifts – R056

From: Mike Priaulx [REDACTED] >
Sent: 12 May 2025 17:55
To: PlanningPolicy
Subject: KOV draft Neighbourhood Plan consultation – Representation - MP

Dear Planning Policy team,

Response on behalf of Swifts Local Network: Swifts & Planning Group.

I am the Chair, and also London representative.

For some local context I have [REDACTED]
[REDACTED].

Mr Mike Priaulx, [REDACTED]

Tel. [REDACTED]

Our comments:

Please add: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in the KOV area return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.

This is because nesting sites in buildings are excluded from the Biodiversity Net Gain methodology so need their own clear policy.

Also, In summary, please consider endangered urban wildlife such as red-listed bird species which inhabit buildings in the KOV area.

Therefore, please add to the policy: Swift bricks to be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM which require at least one swift brick per home on average for each development. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist.

In more detail, the reason for this is that bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own clear policy.

The Government's response in March 2023 to the 2022 BNG consultation stated that: "We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features may be appropriate" (page 27, https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/).

The London Plan supports swift bricks (policy G6 B4, as swift bricks are artificial nesting habits especially relevant to the urban environment).

Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26).

NPPF December 2004 calls for measures for swifts.

Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf).

Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind.

Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>)).

The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) <https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/> This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document:

"Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways."

Many other Local Authorities are including detailed swift brick requirements in their Local Plan, such as Tower Hamlets Local Plan Regulation 18 stage (paragraph 19.70, page 311 - <https://talk.towerhamlets.gov.uk/17424/widgets/82097/documents/50138>), which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020, and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" <https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19>), and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4, <https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/>), so such an enhanced level should also be considered

END.

Transport for London – R057

From: Jolyon Cox >
Sent: 12 May 2025 15:57
To: PlanningPolicy
Cc:
Subject: KOV Neighbourhood Plan Reg. 16 final submission

Dear recipient,

Thank you for consulting Transport for London (TfL) on the Pre-Submission (Regulation 16) Kennington, Oval and Vauxhall (KOV) Neighbourhood Plan. Overall, TfL supports the Plan and its policies, with the following amendments and suggestions. Please find the following suggested amendments below.

General points

- Firstly, in section 3.6 of the document London Policy T6, T7, and D8 should also be included in the table.
- In section 5.1 the last objective could be firmer and read ‘Prioritise **and encourage** pedestrian, cyclist and public transport users’ experience of our area’
- In addition to the suggested initiatives throughout the plan, school streets to improve air quality and encourage active travel could be included as a response to the issues identified in Section 2.

KOV 1

- In relation to policy ‘KOV 1’, reference to how these green spaces are accessed by means of walking, cycling and public transport should be included, with consideration to any improvements that could be made to enhance sustainable access to these areas for as many people as possible.

KOV 2

- Policy A: We strongly support removal or reduction of parking in line with London Plan Policy T6 which states that ‘Car-free development should be the starting point for all development proposals’ in well-connected places.
- Policy A: When referring to ‘freight consolidation arrangements’ there should be a mention of encouraging sustainable freight from these consolidation hubs in line with London Plan policy T7.
- Policy A: Cycle quality standards should be referenced when cycle parking is mentioned, wording should be amended as follows, ‘Provision of secure parking facilities for standard bicycles and cargo bicycles, which should be designed considering the potential for growth in future demand **and in line with TfL’s**

London Cycling Design Standards (LCDS) and LTN 1/20', to ensure guidance on the importance of providing secure, accessible, well-lit cycle parking is followed.

- In addition, when mention to 'Mayor's Healthy Streets for London approach' is included in 'KOV 2', reference to ensuring safety at day and night and as well as Women's safety should be included, this could also include reference to development proposals undertaking daytime and nighttime ATZ assessments. We also note that safety and Healthy Streets Approach could be considered as a wider objective.
- TfL supports the policy that development proposals adjoining or adjacent to an identified Greenway must contribute financially towards the Greenways streetscape to help facilitate a cycle and pedestrian friendly environment. Greenway quality requirements should also refer to TfL's Streetscape guidance which aims to create welcoming places and public realms through supporting green initiatives and a more active city. Amended text could say 'Such improvements must ensure Greenways meet the quality requirements set out in Appendix A to Lambeth's Healthy Routes Plan and TfL's Streetscape guidance as well as addressing road danger in line with the Safe by Design principles outlined in Lambeth's Road Danger Reduction Strategy. Kerbsides along Greenways should be improved in line with Lambeth's Kerbside Strategy'.

KOV 3

- TfL are supportive of 'KOV 3', however in section B when discussing 'public realm' it could be included that the public realm should be accessible by walking, cycling as well as public transport, creating an environment that is open and accessible for all.

Local Infrastructure Improvements

- TfL supports 'Project F', 'delivery of initiatives to make our streets walking pedestrian and cycling cyclist-friendly as identified in Lambeth's Transport Strategy and Climate Action Plan. These initiatives include but are not limited to road danger reduction on those parts of the Healthy Routes Network that do not overlap with the proposed Greenways, traffic calming initiatives in the context of the Low Traffic Neighbourhood initiative, and partial pedestrianisation and public realm improvements in local centres.' and look forward to working in partnership on the delivery of these initiatives to ensure they are delivered in line with national and TfL guidance on active travel and don't cause adverse affect on movement and access in the neighbourhood.

Kind regards,
Joly

Joly Cox (he/him)
City Planner | Spatial Planning
Email: [REDACTED] | Tel: [REDACTED]
11th floor, Palestra House, 197 Blackfriars Road, London, SE18NJ

At TfL we work flexibly – so whilst it suits me to email now, I do not expect a response or action outside of your own working hours.

This message has been scanned for malware by Forcepoint. www.forcepoint.com

Vauxhall One – R058

| | |
|---|---|
| Title | <i>(Not provided)</i> |
| First name | Holly |
| Last name | Dyas |
| Job title | Public Realm and Operations Manager |
| Organisation | Vauxhall One |
| Please submit your comment on the Kennington, Oval and Vauxhall draft Neighbourhood Plan in the box below. | <p>1. The BID welcomes KOV 1 and its support of local green spaces in the area. These should be protected and enhanced where possible.</p> <p>2. The KOV 3 Policy on Local Centres is welcomed however, the BID questions why the Neighbourhood Plan only addresses the Kennington Cross Local Centre in KOV 3 Policy. It is noted that in the 2014 survey response that the local centres are not listed because they are in the Lambeth Local Plan ED11. However, the BID still believes the local centres should be listed and put forward as a matter of importance, as Kennington Cross is listed in the Lambeth Local Plan anyway.</p> <p>The Kennington, Oval and Vauxhall area has multiple local centres which serve a key purpose of providing convenience and amenity to residents at an accessible walking and/or cycling distance. The Lambeth Local Plan identifies 9 local centres as being important to the area:</p> <p>Wilcox Road Kennington Lane Kennington Park Road/Kennington Road Kennington Cross Oval (Clapham Road) Oval (Brixton Road) Vauxhall Street/Jonathan Street Lambeth Walk Black Prince Road</p> <p>Vauxhall One agrees that shops should be safeguarded and new development encouraged to fit into the local fabric or, where not feasible, to contribute to the improvement of the immediate public realm instead. However, the KOV plan should give weight to all centres and distinguish the benefits of each. In the Lambeth Local Plan PN2 Vauxhall it is noted that Vauxhall Cross should be promoted as a new retail cluster.</p> <p>3. More can be done to investigate the character of the KOV area, including historical building design, rights of way, street design, building height, conservation areas and Lambeth Local Plan defined character areas: Lambeth Gateway, Central Embankment, Glasshouse Walk, Vauxhall Cross, Miles Street, and Pascal Place. In point 6.4, the Plan asks for the Council to have better ‘understanding of the essential features of local character’, if these are not defined then how is it possible to draw from. By defining or presenting guidelines on the character of the KOV area</p> |

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| | <p>the Neighbourhood Plan could more easily influence new development.</p> <p>4. Including a policy about development that provides retail units in appropriate locations which include interiors available for temporary or pop-up and at a range of sizes to induce local entrepreneurship where possible. This would do more to support and retain small businesses in the area.</p> <p>5. Vauxhall One have concern about the nature of the Neighbourhood Plan and its construction, including the level and type of consultation used to create the policies.</p> <p>The consultation seems to be drawn from pre-Covid discussion, which is almost 10 years ago and will miss the richness of insight that could be gained through more recent consultation. On the whole, the consultation and document are very Oval and Kennington focused with little detail on Vauxhall. Given that a key number of recommendations refer to using section 106 and CIL pots (which will be generated by development in Vauxhall) the lack of involvement of Vauxhall stakeholders or focus on Vauxhall needs is concerning.</p> <p>6. Vauxhall One would like to be involved in developing a Neighbourhood Plan that more specifically refers to the issues and communities of Vauxhall and can be integrated with the aspirations of the Kennington and Oval surrounds.</p> |
|--|--|

Waterloo Community Development Group – R059

From: Michael Ball <[REDACTED]>
Sent: 13 May 2025 11:28
To: PlanningPolicy
Subject: KOV draft Neighbourhood Plan consultation – Representation MB

Dear Planning Policy team

WCDG held a well-attended public meeting at the end of April which considered the KOV Neighbourhood Plan, and I was charged with sending a letter of support.

I have just realised that the formal consultation closed yesterday, so I note that these comments are late: but, since we don't have any objections or seek any changes, I hope that our support can be registered.

By way of explanation, WCDG covers that part of the ward down to Lambeth Rd, and our core area of interest aligns with the SOWN Neighbourhood Plan; nevertheless, we retain a keen interest in the community and development north of Black Prince Rd (traditionally the southern boundary of Bishops Ward), particularly the area around Lambeth Walk and along the Albert Embankment (which was part of the Waterloo District Plan which WCDG helped draft in 1977!).

Some residents from these areas regularly attend our meetings, since Waterloo remains their nearest transport node and retail centre of significance. We have also been involved in the 5-year development of the SOWN NP and remain a member of the SOWN Steering Group and Planning Group, so we have some experience of the value of a good Neighbourhood Plan.

The meeting was impressed with the policies, coverage, scope and detail of the KOV Neighbourhood Plan.

I also found it a very useful document, even in draft form, when I represented the local Vauxhall community at last year's Appeal inquiry regarding St Anne's Settlement on Harleyford Rd.

We would like to be kept informed of the Examination and adoption process.

All the best

Michael Ball
Waterloo Community Development Group

[REDACTED]
[REDACTED]

www.wcdg.org.uk

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