

7 July 2025

To: Jill Kingaby BSc (Econ) MSc MRTPI, Examiner
Steve Carnaby, Intelligent Plans

From: Kennington Oval and Vauxhall Neighbourhood Forum
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Examination Reference: **01/JK/KOVNP**

Kennington, Oval and Vauxhall Neighbourhood Plan Response to questions from the Examiner

Thank you for the opportunity to provide clarification where appropriate to the questions raised directly by the Examiner and in response to questions arising from the Regulation 16 consultation.

Questions 1-5 are each addressed individually. In respect of the questions arising from the Regulation 16 consultation (questions 6-16), individual responses have been provided where it is considered necessary. There are comments asking whether the neighbourhood plan should be amended in view of the representations made. Where no specific response is provided it is on the basis that the Forum is content with the Plan as submitted and sees no reason to make any change.

- 1.1 Question 1 and 3. The reference to maps in the supporting text, namely Plans C and F, is extracted from the Lambeth Local Plan and therefore cannot be amended. It is suggested that if clarity is required in respect of Local Plan mapping, the Examiner may wish to recommend the Plans C and F in the supporting text are removed if they are felt to cause confusion and that a link to the Lambeth Local Plan policies map which provides layers including Conservation Areas, Local Centres and Opportunity Areas, [\(Link\)](#) is added.
- 1.2 Question 2. The Forum would agree to a revision to 3.4 to reflect the latest revision of the NPPF (noting the KOV plan is examined against the 2023 version rather than the 2024 version) as directed by the Examiner.
- 1.3 Question 3. The Forum would agree to the inclusion of a suitably worded cross-reference to the Air Quality Focus Areas for inclusion in paragraphs 5.13-5.17 as directed by the Examiner. The “NEV Opportunity Area” mentioned in paragraph 5.19 on Page 26 is indeed the “Vauxhall, Nine Elms and Battersea Opportunity Area”.
- 1.4. Question 4. The Forum is not aware of any update to the status of this land.
- 1.5 Question 5. As detailed in the Consultation Statement, progression of the KOV Neighbourhood Plan has taken several years both pre and post the pandemic. The whole of the designated area has been treated equally in respect of engagement and consultation. There has never been any intention of the plan to focus on one geographical area over another.
- 1.6 As a general response to the Regulation 16 queries, the policies contained within the KOV Neighbourhood Plan can only relate to land use policies, which would exclude inclusion of aspects such as markets and street stalls which are a licencing issue (R002). The Local Green Spaces Policy (KOV1) and Community Infrastructure Premises Policy (KOV4) have been subject to detailed research and local input and as such, none of the comments made give rise to any need to make changes to the plan unless expressly directed by the Examiner.

A location may not have been included because it is considered already to benefit from local protection or not to have met the criteria for inclusion.

1.7 As set out in the Basic Conditions Statement, the strategic policy context within the KOV area includes both the London Plan and the Lambeth Local Plan. There is therefore limited policy space for the KOV plan and matters such as proposed transport improvements are already covered by existing policy. (comment R043).

1.8 Several comments have been made by various respondents in respect of the Local Views Policy (KOV5). During the development of the KOV Plan, Lambeth Council prepared and consulted upon a Revised Local Views Supplementary Planning Document (SPD) (January 2024). As such, views originally sought to be included within the KOV Plan were removed to avoid duplication with this document, resulting in a smaller number being included within the Plan. The composition of KOV5 including view cones, images and description, are based on the layout of the draft SPD.

1.9 KOV5D relates to the tall buildings in the City of London which provide the dramatic backdrop to this view. In acknowledgement that there may well be additional tall buildings constructed in front of the existing Elephant and Castle buildings the policy is not focused on the physical number of buildings in the background but the appreciation of the view relates, however, to the stark change between the treelined leafy street of Kennington Park Road to the dramatic skyline and imposing buildings in the background beyond and the contrast between the two. It is the change to the foreground which would affect the appreciation of the view and therefore it is felt that the KOV5D can withstand additional tall building development in the background, for example, that indicated by the NHS at Wooden Spoon. It is further noted that submission R050 also objects to the inclusion of KOV5D. The Forum maintains that this is an appropriate Local View for inclusion in the policy and that it does meet basic conditions.

1.10 There are other matters raised in respect of the KOV5 policy which, in the view of the Forum are not matters pertaining to meeting the basic conditions. The policy is in general conformity with strategic policy in its approach but there must be sufficient leeway for neighbourhood plans to refine these with local detail, reflecting the views that are important to those who live and work in the area and for whom these views form part of their sense of community. However, should the Examiner, upon review of the representations, require changes to the wording of the policy, the Forum will make the alterations requested.

1.11 In response to the comments made by Historic England and Transport for London, the Forum is pleased that they are both supportive of the KOV Neighbourhood Plan. We would leave it to the discretion of the Examiner to consider whether the policies or wording of the supporting text should be updated to include their suggested additions but do not disagree with the comments raised.

1.12 In respect of submission R050, the Forum sees is no reason to include reference to the South East Marine Plan.

London Borough of Lambeth Comments. (R049)

KOV1 - The KOV Forum is content that the Local Green Spaces policy supporting information provides sufficient detail to demonstrate the sites included meet the requirements as set out in the NPPF. Despite the query raised over 'Claylands Road Open Space' and 'Cotton Gardens Park' the Forum contends that these are appropriate and justified for inclusion as set out.

KOV2 - In respect of the Healthy Routes Network, the KOV Forum does not have access to this mapping layer to overlay on the policies map, it is, therefore, suggested that if the Examiner determines that clarity is required, a hyperlink to the [Healthy Routes Network](#) could be included within the text.

KOV 3 The KOV Forum sees no reason to change the supporting text. Post Offices are considered critically important to the local community and whilst it is accepted that the policy wording itself cannot legislate against their closure, the reader of the KOV NP should be aware of the local sentiment and concern over their loss and the impact on the community. In relation to Part B of the policy, the KOV Forum contend that the policy does comply with the CIL regulation 122 requirements. In the view of the Forum the frontage of the Local Shops currently provides an informal public realm space for people to meet, rest and circulate. This would be lost should a local shop building be converted to non-commercial uses, for example, a private dwelling, as the appropriate street furniture would be removed and people would lose space for social interaction. This has an adverse impact on local people and steps should therefore be taken to mitigate the loss by reproviding such public realm space nearby.

KOV5. The KOV Forum is content with the visual management guidance for KOV5B and C . If the change suggested for KOV5A is requested by the Examiner, the Forum would agree to the removal of the wording as set out by Lambeth. In respect of KOV5D, a further explanation in support of its inclusion is contained in 1.9 and 1.10 above. If the Examiner wishes to propose changing the name of the view to the “cluster of tall buildings at Elephant and Castle” this would be accepted by the Forum.

We trust this provides the clarification required and response to questions raised by the Examiner and we look forward to hearing from the Examiner. Thank you.

M Evers

On behalf of Kennington, Oval and Vauxhall Neighbourhood Forum