

Summary of Regulation 16 Representations

This document relates to the referendum on the Kennington, Oval and Vauxhall Neighbourhood Plan, to be held on Thursday 11 December 2025. The Neighbourhood Planning (Referendums) Regulations 2012, regulation 4, clause (3)(b) requires the local planning authority to publish a summary of representations submitted to the independent examiner as part of the Regulation 16 publication period of the neighbourhood plan. This document fulfils that requirement.

The table below provides a summary of comments received. These summaries are an attempt by council planning officers to capture the important points of the representations in a succinct manner. All representations received were submitted in full to the independent examiner, and this summary has been produced after the conclusion of the examination of the plan. The [full versions of the representations](https://www.lambeth.gov.uk/sites/default/files/2025-06/kennington-oval-vauxhall-neighbourhood-plan-regulation-16-representations.pdf) can be found on the council's website at (<https://www.lambeth.gov.uk/sites/default/files/2025-06/kennington-oval-vauxhall-neighbourhood-plan-regulation-16-representations.pdf>).

Consultee Name	Summary of Comments
Aspeling, Jane	Support for preservation of green spaces and improvement of air quality.
Bagshaw, Hilary	Policy KOV1 does not take into account the effect of shadows cast on green spaces by tall buildings immediately adjacent. Policy KOV3 has no specific references to markets or street stalls. For policy KOV4, it is unclear what the criteria were for the selection of community assets and why some other pubs and community centres were not included – the Black Prince pub, the Tommyfield, and the Black Prince Community Centre. Policy KOV5 should be more robust on building heights. While this may go beyond the scope of a Neighbourhood Plan, there should be ambition for proper, London-wide zoning, and joined-up planning. Developers should be pressured to think more about lower-rise properties in keeping with the character of the area. The vistas section should talk about improving views, not just preserving them. Views are Oval-centric, and views from Kennington Cross to the Imperial War Museum should also be included. The whole plan should contain more on preserving trees.

Baker, Pamela	General support for the plan.
Callaghan, Clare	Overall support for the plan, but would like it to go further. Would like specific reference to protecting conservation areas from tall buildings. Would like to see Vauxhall (and northwest end of Kennington Lane in particular) protected from more fast-food chains. Would like to see better traffic management to improve air quality – location of some cycle lanes on A-roads has concentrated other traffic, resulting in more dirt and pollution.
Callaghan, Susanna	Support for policy KOV1 on local green spaces. Support for policy KOV5 on protected views, particularly view D Kennington Park Road to Elephant and Castle cluster in light of the tower proposal for junction of Kennington Road and Kennington Park Road, which would adversely impact this view.
Cherney, Kaethe	Proposed building will block sunlight in the park, is out of character with the neighbourhood, does not have sufficient affordable housing, sets a precedent for further tall buildings, and is ugly.
Condon, Gregory	Concerned about lack of detail on architectural character of the area – very little about building materials, frontage rhythm, or height consistency. May lead to inappropriate development.
Cross, James Stephen	Policy KOV2 – significant air pollution also caused by tourist coaches parking on Albert Embankment, Tourist coaches should be charged exorbitant rates to park in Lambeth. Policy KOV5 – the view down the Albert Embankment side of the River Thames towards the Houses of Parliament should also be protected. Could not see anything in the plan that addresses heritage. Development of London Fire Brigade headquarters on Albert Embankment addresses heritage aspect on the embankment side, but also expecting 150,000 visitors a year to the museum element via Black Prince Road – this is a disaster waiting to happen. If tower blocks are included to the rear of the main building this will create a ‘street canyon’ inhibiting dispersal of pollution and harming Old Paradise Gardens. The requirement for meaningful discussions must be emphasised.
Cull, Crispian	Upset at Kennington Re-imagination scheme. Garish planters and waste bins installed. Roads no longer swept and bins overflowing. Drains clogged with leaves in the winter, creating danger of flooding. No children using the play areas, and vagrants sleeping there at night and using planters as toilets. Cricket fans leaving the Oval also use the area as a toilet. Changes to street layout have exacerbated this and promoted noisy crowds onto the streets on match days. Claims that the scheme has reduced pollution seem unsubstantiated, as these streets were already quiet. Vehicles that do have to access them now take a more circuitous route, resulting in higher emissions. Request that the scheme be reversed.

Dzwig, Sophia	The section on local facilities and services should reference recent closures of local schools. Plan should refer to importance of providing schooling for local children to encourage families to stay in the area. Plan should refer to the strictness of constraints in conservation areas – difficult to add sympathetic roof conversions. Conservation area guidelines for Vauxhall suggests traditional mansard roofs may be acceptable, but council seems to have a blanket policy of refusing them.
Edgington, Max	Support for plans to create safer streets for active travel and play.
Evers, M	Overall support for the plan, and for each of the individual policies within it. Policy KOV1 responds to community concern on effects of tall buildings and the area is deficient in open space. Sixty percent of local people have no access to a car, so maintaining a good mix of amenities within walking area is important. Community infrastructure facilities are much valued by local residents. The draft neighbourhood plan has already been cited by the local community in objection to development proposals that would impinge on the protected views it contains. The area has a lot of transport infrastructure, but consequently poor air quality. Promoting walking, cycling and public transport can help combat pollution. Proposals for local infrastructure improvements are welcome, and it is important that the forum works with the council to determine how Community Infrastructure Levy and Section 106 funds are spent to support key priorities.
Farnell, Valerie	Support for designation of local green spaces – the benefit of quality green spaces is well-understood and was emphasised during the pandemic. Support for policies to improve air quality, which will work alongside existing council policies on healthy neighbourhoods. Support for policy to protect from loss of community assets. Support for policy on local views to conserve and enhance the quality, character and appearance of predominantly residential neighbourhoods, and areas of special architectural and historic interest.
Galan, Maria	Oppose the tower being built – will not be affordable housing for local families, but luxury student accommodation. There is already plentiful student accommodation in Kennington and Vauxhall.
Gregson, Jill	General support for the plan.
Hale, Gregoryz	Overall support for the plan. Support for policy on local views, which is necessary to protect area from developers who are only interested in profit at the expense of community values. Inclusion of Community Infrastructure Levy projects identifies the real needs of the community.

Heukensfeldt Jansen, Suzanne	General support for the plan.
Holding, Penny	There is nothing dealing with investment-based housing developments, and how to ensure they do not remain vacant or under-utilised.
Horner, Jane	Support for improving air quality, reducing noise pollution, and protecting green spaces.
Huntley, George	Policy KOV2 – some of the selected greenways are not very busy pedestrian routes, such as Lambeth Palace to Vauxhall and the Riverside, and Kennington Road around the Imperial War Museum. Surprised that Kennington Lane is not included as a greenway – huge numbers of pedestrians and cyclists use this route every day. The road is dangerous, polluted, narrow, congested, and has no cycle lane and inadequate crossings – being a greenway would be the first step to improving the situation.
Huntley, Emily	Lack of focus on improving key routes, particularly Kennington Lane/Kennington Cross – there should be pavement widening, safer crossings, and re-greening of the area. Even monitoring speeding would help in lobbying for safer roads. Some areas need more trees, but others are overplanted – Knights Walk/Cotton Gardens is not used because it is overplanted and there is not enough sunlight. More trees are needed along roads rather than in parks – people want to sit in the sunshine. Policy KOV1 includes Pedlar's Acre Park – this space lacks investment and care, with outdoor gym facilities installed but not maintained. Policy should require low quality or under-utilised facilities to be removed and for the space to return to nature. More investment needed in these smaller green spaces to make them as pleasant as Kennington Park. Policy KOV2 references removal of parking but does not include enough detail. Should aim to return a proportion – 50% - of car parking spaces to other uses. There should be a plan for new development to fund this.
Johnson, Rebecca	Neighbourhood plans are not wanted by local residents. Public transport needs to be improved first if you want people to stop driving.
Keane, Michael	Overall support for the plan. Increased demand on green spaces, so protecting them essential. A number of locations in the area breach air quality levels and the plan offers ways to reduce this. Local centres give areas their character and vitality, but are under threat, so support for them in the plan is positive. Once community assets are lost, they rarely come back – the plan shows an understanding of how social infrastructure underpins a thriving

	neighbourhood. Many views in the area have been impacted by high rise development – support protection of views in light of increasing pressure for high-rise development.
Khakoo, Akhtar	General support for the plan.
McConnell, Matthew	General support for the plan, but it could also include more detail on reducing private car use in the area, and increasing public green space when tall buildings are built.
McIntyre, Phil	General support for the plan, especially protecting green spaces and local views.
Monger, H	Overall support for the plan. Local Green Space for Oval Triangle could be extended to include the greenery around St Mark's Church. Post office on the corner of Kennington Lane and Kennington Park Road could be included as a community asset. For protected views, the opposite view from the Oval down Harleyford Road towards the railway should also be included.
Morgan, Ruth	Overall support for the plan. Would like to include the mix of shops getting permission – please encourage more small, local, useful shops.
Muirhead, Oona	Support the plan's objectives for improving air quality (critical to health), protecting green spaces and routes (improves mental and physical health), protecting important local views (high-rise should be confined to Vauxhall), supporting local shops and community facilities, and prioritising pedestrians, cyclists and public transport users.
Neely, Clare	Local infrastructure priority F should be changed from walking and cycling to 'bus priority, walking and cycling'. Should require reallocation of road space to these uses, with 24/7 bus priority installed on strategic roads. Parking for deliveries and short-term pickup to be located on side roads. All side roads should be part of the healthy routes network with through traffic removed. Kerb-segregated cycle tracks should be provided on strategic roads. Parking for hire cycles and scooters should be on the road not the footway.
Revell, Richard	Overall support for the plan, particularly local green spaces and air quality requirements – greenery and traffic restrictions on Kennington Oval have been positive.
Roberts, Andrew	Overall support for the plan. More accommodation should be given to low polluting vehicles, including cars. More off-street parking is needed, parking is being reduced while density increases – people need cars at different life stages and should not be excluded by policies around parking. Policy KOV3 should consider parking spaces for clean electric vehicles to encourage local shopping. Policy KOV5 – the broad avenue feel and mid-rise nature of the area is essential, so protection of the view is critical.
Robinson, Catherine	Overall support for the plan – it covers a range of issues that I strongly support.

Seaton, Andrew	Overall support for the plan – particularly protection of local green spaces due to the health benefits they bring and increasing development density in the area. Also concerned by lack of wider public benefit for large scale development in the area – including relative lack of affordable housing in new developments.
Shaylor, Matthew	Support for policy KOV2, but it is mis-named – it focuses on transport issues and not other sources of pollution such as wood burning stoves. Should be renamed ‘promoting active travel and healthy neighbourhoods’. Objection to views B and D in policy KOV5 – do not believe these views have sufficient merit to be worth preserving.
Shekaran, Akshaya	Support for policies on green spaces, community assets, and local views.
Snedecor, Connor	Section on local green spaces would benefit from a further point about overshadowing. Development adjacent to these spaces must be modest and considered and should not impinge on sunlight in these green spaces.
Sutcliffe, James Thomas	Objection to the plan – the plan is not needed.
Truesdale, Peter	General support for the plan.
Ulleri, Maria Rita	The plan will give the local community a voice. Many ugly tower blocks have been built and have few lights on at night. The homeless are left to perish and foreign investors encouraged.
Wigley, Andrew	Happy to see a focus on air quality and pedestrians, cyclists and public transport users – but the plan does not go far enough, private cars should be removed from the road completely in London.
Woods, Robert	Overall support for the plan. Additional points relating to the Oval area: Oval tube station should be maintained and regularly cleaned. Removal of street poles and CCTV cameras outside Oval tube station to declutter the space. Install public urinal outside Oval tube station. For Hanover Gardens and Elias Place, redesign roads with pedestrian priority, continuous paving across entrances, and planters; replace parking spaces at A3 end with planting; move hire bike/scooter parking on Elias Place to Oval tube station and add cycle parking rack to Hanover Gardens; convert parking spaces to electric vehicle charging.
Crumpets Café	Support for the plan – enormous amount of development in Vauxhall in the past 10 years and our representations have been largely ignored.
Bonnington Centre Community Association	Support for the plan – it will give the community a meaningful say in the type of development we do and don’t want to see in our area. Strongly support establishment of a community development trust to ensure projects are delivered. Would also like to see developers held accountable for delivering 35% affordable housing and for delivering more social housing.

Environment Agency	Generic neighbourhood plan advice note for Kent, South London and East Sussex submitted, setting out key environmental issues the plan should consider – including flood risk, ecology, groundwater quality, infrastructure delivery, and environmental permitting regulations. No specific comment provided on whether the draft plan covers these areas adequately.
Guy's and St Thomas' NHS Foundation Trust	Policy KOV2 – support improvements to air quality, but concerned that a blanket approach has been taken. Concerned about removing and restricting parking and access – this could cause extended journeys for patients and healthcare providers, compromised drop-off points for elderly patients, problems with access for deliveries, and problems with general and clinical waste collection. Healthcare facilities and NHS staff should be exempt from parking restrictions. Policy KOV5 – view D appears to touch the edge of the site known as Wooden Spoon House. The site is identified for a tall building in a site allocation, and the view may therefore be in conflict with the site allocation. Clarity requested, and potential amendment to bring the view in line with the site allocation.
Historic England	Pleased to note that comments on an earlier consultation have been considered, including identification of defined viewing cones for local views. Policy KOV5, view A – additional wording proposed to emphasise the view is sensitive to potential change from encroaching development, and to provide further detail on the heritage significance of gas holder number 1. Policy KOV5, view D – additional wording proposed to highlight that Kennington Park Road follows the alignment of the Roman road from London to Chichester and therefore with London Bridge and the historic development of the City of London.
London Borough of Lambeth	Policy KOV1 – Appendix B is not clear enough in providing reasons for designating the Local Green Spaces. It should be formatted in a way that consistently addresses the three criteria for Local Green Spaces in the National Planning Policy Framework. The council has reservations about whether Local Green Spaces ix and x meet the criteria, and they should be removed if they do not. There is also inconsistency of the naming of the spaces across the plan, which should be fixed. Policy KOV2 – Lambeth's Healthy Routes Network should be overlaid on the policy map to show all the relevant routes. Policy KOV3 – the requirement for contributions for public realm improvements where there is a loss of local shops is not

	considered to be directly related or fairly or reasonably related in scale and kind to this type of development, and should be removed. There is a reference to protecting post offices, but under planning use class legislation there is little that can be done to stop a change of use of post offices, and this reference should be deleted. Policy KOV5 – view coordinates should be provided as eastings and northings rather than latitude and longitude; view cones should extend beyond the subject to capture background elements; view locations should not be in the middle of roads. View A – the description and coordinates provided do not seem to match. Reference to a view along a second viewing corridor from this location appears incorrect and should be removed. View B – the statement that buildings taller than their neighbours will be considered inappropriate is too restrictive. References to the character of conservation areas should be removed – this is a separate issue to the preservation of the important elements of a protected view. View C – the words ‘reliant on’ should be replaced by ‘supported by’. View D – views of the Elephant and Castle cluster are not considered to be appreciable from this location, or of demonstrable importance. The view would also unjustifiably limit development along Kennington Park Road. The view should be deleted. If it is retained, it should be renamed to reference Elephant and Castle rather than the City of London; and the reference to a consistent building line on both sides should be removed, as the right-hand side of the view is screened by trees.
Marine Management Organisation	Generic information on marine licencing of certain activities provided. A list of potentially relevant policies from the South East Inshore Marine Plan provided – no comment provided on whether the neighbourhood plan is in alignment with these policies. Recommend references be added to the South East Marine Plan and its remit, the requirement for marine licences for certain activities, and the intertidal element of the area.
National Highways	No comment – the closest part of the strategic road network is 10 miles away from the neighbourhood plan area.
Natural England	No specific comments made on the neighbourhood plan. Annex provided with generic advice on neighbourhood planning and the natural environment, covering natural environment information sources, and some details around the kind of natural environment issues that may be considered as part of neighbourhood plans.

	These issues include landscape, wildlife habitats, priority and protected species, and best and most versatile agricultural land. The annex also includes information on potential ways to enhance the natural environment.
Port of London Authority	No comment.
South Bank and Waterloo Neighbourhood Forum	General support for the plan.
Standard Securities/Rolfe Judd Planning Ltd	Freeholders of 409 Kennington Road. Planning application has been submitted for mixed-use scheme combining student accommodation with flexible employment space, 16 storeys in height at corner of Kennington Road and Kennington Park Road, stepping down to 6 storeys on Kennington Park Road. Policy KOV5, view D – the viewing place is identified in the text as the junction of Harleyford Street and Kennington Park Road, outside of Oval Station. But the image of the view included alongside shows a view from the middle of the road, not the same location. The image is from Google Street View, which is taken from a moving vehicle. Concern that no proper assessment of the view has been undertaken. Pedestrians on the traffic island in the middle of the road will be focused on traffic lights rather than the view. The view cone on the figures should also not be extended along Kennington Park Road. The extent of the width and length of the cone has not been professionally assessed and based on townscape analysis. The view as presented would be obscured by existing trees in the summer or winter. The tall building cluster in Elephant and Castle is also wider than the narrow focus of the view cone. Also unclear why the view is important or what character it is seeking to protect. No similar protected view of Vauxhall Opportunity Area is proposed despite the similar character of tall buildings. Development is ongoing in Elephant and Castle, so the view will change. The other three views in the neighbourhood plan are of specific local landmarks, while the buildings at Elephant and Castle are not specific landmarks, not heritage assets, and are not specifically centred on Kennington Park Road. The view is seeking to limit development for no clear planning purpose. We have undertaken a Heritage and Townscape Visual Impact Assessment of 409 Kennington Road, and conclude that the

	proposed development would not affect the composition and character of the view. The neighbourhood plan is not compliant with national policy because the NPPF requires it to take account of local character and distinctiveness, and no such assessment has been made for view D. The neighbourhood plan does not achieve sustainable development because there is no evidence that view D is highly valued by the community or that development in this view would undermine the character of the area. The neighbourhood plan is not in general conformity with the development plan, because the assessment of view D is not in line with the approach to designating views taken in the Local Plan and the view has not been identified as important in the Local Plan or the emerging Local Views SPD. View D should be deleted. If it is retained, a professional assessment should be undertaken by a recognised townscape and heritage consultancy; the origin point of the view should be amended on the policy map to be outside Oval station; the image of the view should be replaced with a professionally taken and surveyed image from the location outside Oval station; and the view cone on the map should be replaced by a straight line indicating a northward view.
Swifts	Include requirement that existing nest sites for building-dependent species such as swifts and house martins should be protected, or mitigation provided if they cannot be – nesting sites in buildings are not covered by Biodiversity Net Gain methodology so need a separate policy. Also consider red-listed bird species that inhabit buildings in the area. Add requirement for swift bricks to be installed in new developments.
Transport for London	Recommend inclusion of references to London Plan Policies T6, T7 and D8, to ‘encouraging’ walking, cycling and public transport use, and air quality improvements to school streets. Policy KOV1 – include reference to walking, cycling and public transport to the green space; and consider how improvement to sustainable access could be made. Policy KOV2 – support for removal or reduction in parking. Include reference to sustainable freight use from consolidation hubs. Reference London Cycling Design Standards. Reference importance of ensuring safety during the day and night, and

	women's safety as part of Healthy Street Approach. Reference TfL Streetscape guidance for the greenways. Policy KOV3 – support for policy, but reference that public realm should be accessible by walking, cycling and public transport. Support for inclusion of walking and cycling initiatives in the local infrastructure improvements.
Vauxhall One	Support for policy KOV1. Overall support for policy KOV3, but unclear why it only covers Kennington Cross – there are nine other local centres in the area that should also be covered. More could be included on the character of the area – if this is not defined, it is hard to take account of it. There should be an additional policy about providing retail units in appropriate places, including temporary and pop-up spaces, and with a range of sizes. Concern that the consultation material seems to be drawn on pre-covid discussions. Document is very focused on Oval and Kennington and not so much on Vauxhall. Section 106 and Community Infrastructure Levy funds will be raised by development in Vauxhall, so Vauxhall stakeholders should have been more involved.
Waterloo Community Development Group	There are linkages and overlapping membership between this group and the neighbourhood forum – the community group is supportive of the neighbourhood plan.