

# Report on Kennington, Oval and Vauxhall Neighbourhood Plan 2035

An Examination undertaken for Lambeth Council with the support of the Kennington, Oval and Vauxhall Neighbourhood Forum on the December 2024 submission version of the Plan.

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Date of Report: 29 September 2025

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## **Main Findings - Executive Summary**

From my examination of the Kennington, Oval and Vauxhall Neighbourhood Plan (KOVNP/the Plan/NP) and its supporting documentation including the representations made, I have concluded that subject to the recommended modifications set out in this report, the Plan meets the Basic Conditions.

#### I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – the Kennington, Oval and Vauxhall Neighbourhood Forum;
- The Plan has been prepared for an area properly designated the Kennington, Oval and Vauxhall Neighbourhood Area shown on Plan A, of the KOVNP;
- The Plan specifies the period to which it is to take effect on the front cover of the Plan, which is to 2035; and
- The policies relate to the development and use of land for a designated neighbourhood Area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum Area should extend beyond the designated Area to which the Plan relates and have concluded that it should not.

## 1. Introduction and Background

#### Kennington, Oval and Vauxhall Neighbourhood Plan 2035

- 1.1 The KOVNP Area includes much of the northern part of the London Borough of Lambeth, alongside the River Thames from Lambeth Bridge to Nine Elms Lane, which is just south of Vauxhall Bridge. Map A of the KOVNP indicates that all Vauxhall and Kennington Wards, most of Oval Ward, and part of Waterloo and South Bank Ward (following ward boundary changes in 2022) are located within the KOVNP Area. It is an area of high-density urban living and working. The Plan advises readers that, in 2015, over 85% of the housing stock in the KOVNP Area comprised flats, maisonettes or apartments; many with limited or no access to private outdoor amenity space. The St George Wharf Tower (180m in height), controversially granted planning permission in 2005, was the first of the tall buildings in the Vauxhall Cluster. In addition to high-rise buildings, there are many terraces of residential properties, some built in Georgian and Victorian times, as well as twentieth century developments of houses and flats.
- 1.2 The KOVNP Area is located across the Thames and south-east of the World Cultural Heritage Site of the Palace of Westminster (Houses of

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Parliament) and Westminster Abbey. The western part of the KOVNP Area, alongside the River Thames, sits within the Central Activities Zone (CAZ), as illustrated in Figure 2.16 of the London Plan, where significant strategic development is promoted, in accordance with Policy SD4 of the London Plan. Figure 2.16 also shows that the south-western part of the KOVNP Area sits within the Vauxhall, Nine Elms and Battersea Opportunity Area. Policy SD5 of the London Plan states that offices and other CAZ strategic functions are given equal weight relative to new residential development within this Opportunity Area. The KOVNP Area includes a number of Conservation Areas, as well as many listed buildings and structures. The Oval Stadium, famous for hosting national and county cricket matches, is a landmark in the southern part of the KOVNP Area. Local facilities and services (including shops, eating and drink venues, and schools) are available across the Area. Paragraph 2.15 of the KOVNP names two local centres at Kennington Cross and Kennington Park Road, where local facilities are concentrated. Public green spaces are scattered across the Area, with the largest at Kennington Park, Vauxhall Park and Lambeth Walk Open Space (Fitzalan Street/Lollard Street).

- 1.3 Plan C of the KOVNP shows "Local shops and services" across the KOVNP Area, but I questioned whether the Plan was in general conformity with strategic policies in the Lambeth Local Plan, and clear enough for readers, in my letters to the Forum of 23 June and 30 July 2025. The Forum produced a revised Plan that I received on 1 September 2025. This clearly shows designated Opportunity Areas, Local Centres, Conservation Areas, and other important features of the Plan Area. I recommend that Map C should be replaced with this new revised Map and given the title: 'Strategic designations (from the London Plan and the Lambeth Local Plan), and major land-use and transport features'. Proposed modification<sup>1</sup>, **PM1**, should be made to achieve this change so that the Basic Conditions are met.
- 1.4 The Plan Area includes major transport infrastructure, with the rail line on the western side of the KOVNP Area running from Waterloo to Vauxhall and beyond. Vauxhall Cross is a major strategic interchange, with rail, underground and bus services. Lambeth Bridge and Vauxhall Bridge provide road access across the River Thames into Central London. Lambeth Pier and St George Wharf Pier give access to Thames Riverboat passenger services. Major roads pass through the KOVNP Area, notably the Albert Embankment/Wandsworth Road (A3036), Kennington Road (A23), Kennington Lane (A3204), and Kennington Park Road/Clapham Road (A3). These accommodate significant traffic movements, and service public transport (buses). As I saw at my site visit, cycle usage is significant in the Area, as are pedestrian movements on major and minor roads. 60% of households in the locality reportedly do not own cars. However, as illustrated in Map B of the Plan, air pollution across the KOVNP Area's road network, notably at the Vauxhall gyratory, Oval

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<sup>&</sup>lt;sup>1</sup> See paragraph 2.6 below.

- junction, Lambeth Bridge and Kennington Cross, and along interconnecting roads, is high.
- 1.5 The London Mayor's Vauxhall, Nine Elms and Battersea Opportunity Area Planning Framework, adopted in 2012, promotes the "optimum level of development" for the Area. The Lambeth Local Plan advises that the Opportunity Area is now known as Nine Elms Vauxhall. It extends outside the KOVNP Area into the LB of Wandsworth, as illustrated in Map D (and the proposed new Map C) in the KOVNP. These Maps also show the presence of Key Industrial and Business Areas (KIBA) in Vauxhall. The KOVNP Area includes the proposed new Central Activities Zone (CAZ) retail cluster at Vauxhall Cross, shown on Map E of the KOVNP, as an extract from the adopted Lambeth Local Plan, Policy PN2.
- 1.6 Whilst the Kennington, Oval and Vauxhall (KOV) Forum began preparation of a Neighbourhood Plan in 2014, numerous events have occurred in the intervening period to the December 2024 submission of the draft Plan to the local authority, including the Covid pandemic, adoption of the new London Plan and the Lambeth Local Plan (both in 2021), and the need to redesignate the Forum (also in 2021).

#### **The Independent Examiner**

- 1.7 As the Plan has now reached the examination stage, I have been appointed as the examiner of the KOVNP by Lambeth Council, with the agreement of the KOV Forum.
- 1.8 I am a chartered town planner and former government Planning Inspector, with prior experience examining neighbourhood plans in London. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

#### The Scope of the Examination

- 1.9 As the independent examiner I am required to produce this report and recommend either:
  - (a) that the neighbourhood plan is submitted to a referendum without changes; or
  - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
  - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.10 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)('the 1990 Act'). The examiner must consider:
  - Whether the plan meets the Basic Conditions.

- Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
  - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
  - it sets out policies in relation to the development and use of land;
  - it specifies the period during which it has effect;
  - it does not include provisions and policies for 'excluded development'; and
  - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').
- 1.11 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

#### **The Basic Conditions**

- 1.12 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
  - Have regard to national policies and advice contained in guidance issued by the Secretary of State;
  - Contribute to the achievement of sustainable development;
  - Be in general conformity with the strategic policies of the development plan for the area;
  - Be compatible with and not breach European Union (EU) obligations (under retained EU law)<sup>2</sup>; and
  - Meet prescribed conditions and comply with prescribed matters.
- 1.13 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the

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<sup>&</sup>lt;sup>2</sup> The existing body of environmental regulation is retained in UK law.

Neighbourhood Development Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.<sup>3</sup>

## 2. Approach to the Examination

#### **Planning Policy Context**

- 2.1 The Development Plan for this part of the London Borough of Lambeth, not including documents relating to excluded minerals and waste development, is the London Plan 2021 and the Lambeth Local Plan 2021.
- 2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). Government's Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. Whilst a revised NPPF was published on 12 December 2024, the transitional arrangements for neighbourhood plans set out in that document<sup>4</sup> advise that it will only apply to neighbourhood plans submitted to local planning authorities after 12 March 2025. Given the KOVNP was submitted to the Council in 2024, the December 2023 NPPF will apply for the purposes of this examination. Accordingly, all references in this report are to the December 2023 NPPF and its accompanying PPG (unless otherwise stated).

#### **Submitted Documents**

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including:
  - the draft KOVNP 2035 [December 2024]<sup>5</sup>;
  - Map A of the KOVNP which identifies the Area to which the proposed Neighbourhood Development Plan relates;
  - The Consultation Statement [December 2024];
  - The Basic Conditions Statement [December 2024];

https://www.kovforum.org.uk/ files/ugd/16e5aa 2e0e7faace3a458f9765614c4bf8ca02.pdf

<sup>&</sup>lt;sup>3</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

<sup>&</sup>lt;sup>4</sup> NPPF (December 2024): paragraph 239.

<sup>&</sup>lt;sup>5</sup> Important note: The pages references in the report cross refer to the version of the KOVNP on Lambeth Council's website (see footnote 6), which was the version used for the Regulation 16 consultation. The printed copy I was provided with for the purposes of the examination had different page numbering: for example, page 28 of the document consulted on was blank, whereas this has been rectified (and subsequent pages renumbered) in the printed version. To avoid any confusion, I refer throughout this report to the page numbers in the version of the Plan as published for public consultation on 31 March 2025:

- The Strategic Environmental Assessment (SEA) Screening Report [July 2024], and the SEA Screening Report Addendum [February 2025];
- The Habitats Regulations Assessment (HRA) Screening Report [February 2025];
- The representations made pursuant to the Regulation 16 consultation in 2025; and
- The Forum's response of 7 July 2025 to my letter with questions of 23 June, and its response of 1 September to my follow-up question of 30 July.<sup>6</sup>

#### **Site Visit**

2.4 I made an unaccompanied site visit to the Neighbourhood Plan Area on 29 July 2025 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

## Written Representations with or without Public Hearing

2.5 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan, without requests for hearings, and presented arguments for and against the Plan's suitability to proceed to a referendum. I sought additional information in writing from the Forum in June and July 2025, to understand its response to matters raised by respondents to the Regulation 16 consultation exercise. I have taken account of the Forum's replies to me in writing this report.

## **Modifications**

2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

#### 3. Procedural Compliance and Human Rights

## **Qualifying Body and Neighbourhood Plan Area**

3.1 The KOVNP has been prepared and submitted for examination by the Kennington, Oval and Vauxhall Neighbourhood Forum. Designation of both the Forum and Neighbourhood Area was approved by Lambeth Council on 13 July 2015. Upon expiry of the initial 5 year Forum designation, redesignation was approved by the Council on 11 June 2021.

<sup>&</sup>lt;sup>6</sup> View at: <a href="https://www.lambeth.gov.uk/planning-building-control/planning-policy-guidance/neighbourhood-planning/kennington-oval-vauxhall">https://www.lambeth.gov.uk/planning-building-control/planning-policy-guidance/neighbourhood-planning/kennington-oval-vauxhall</a>

3.2 It is the only Neighbourhood Plan for the designated Area, and does not relate to land outside the designated Neighbourhood Plan Area.

#### **Plan Period**

3.3 The Plan specifies clearly the period to which it is to take effect, which is to 2035.

#### **Neighbourhood Plan Preparation and Consultation**

- 3.4 The KOV Forum began preparation of a neighbourhood plan in 2014 and consulted on the first draft Plan in 2018. The Covid pandemic slowed down plan-making, and it was necessary to redesignate the Forum in 2021 (see paragraph 3.1 above). Adoption of the new London Plan and the Lambeth Local Plan, both in 2021, also necessitated a review of the early NP. Work on a new draft KOVNP began in late summer 2023 and, between 25 March 2024 and 13 May 2024, consultation under Regulation 14 took place to obtain the views of local residents, businesses and organisations.
- 3.5 The Forum's Consultation Statement includes a Consultation Record of Public Meetings held in 2015, 2016, 2017 and 2018. An early survey produced responses from 450 local people (after e-copies were sent to 850 Forum members, and 10,000 hardcopies distributed to households and community venues). This identified a number of main issues for consideration, beginning with air pollution, conflict between traffic motor vehicles, cyclists and pedestrians, protection of green open spaces etc. These issues were taken forward in successive public meetings and consultation exercises. The majority of responses in the early survey were from the Kennington Park Road and Kennington Cross localities, so from 2017, it was agreed to promote exhibitions and consultation further north-west and south-west.
- 3.6 Consultation in 2022, 2023 and 2024 began with an online public consultation meeting in February 2022, when the Covid pandemic was still underway which limited face-to-face meetings. In February 2024, a door-to-door leaflet drop to 2,500 residences and businesses, was followed by a drop-in event at Durning Library in April 2024. An e-mail leaflet was delivered successfully to 648 addresses. The Forum also placed copies of its leaflets and consultation documents in local libraries and shops, and with local tenants' and residents' associations, to reach those without digital access.
- 3.7 The Regulation 14 consultation exercise which closed on 13 May 2024, elicited 49 responses, including 2 on behalf of community organisations and 1 private business. Responses were received from 13 statutory bodies, as listed in paragraph D.2 of the Consultation Statement. The Consultation Statement indicates that these responses were analysed and taken into account when preparing the December 2024 version of the KOVNP. This version of the Plan was subject to public consultation, in

accordance with Regulation 16, between 31 March and 12 May 2025. Representations were received from 43 individuals and 16 businesses and organisations (including statutory bodies). Vauxhall One raised concern that 'the consultation seems to be drawn from pre-Covid discussions almost 10 years ago' and that the Plan is focussed on Oval and Kennington, rather than Vauxhall. However, the records show that consultation was significant in 2024 and 2025 post-Covid, across the KOVNP Area. From reading the representations made pursuant to Regulation 16 and other documents, I am satisfied that the consultation process has met the legal requirements i.e. procedural compliance, and has had regard to the advice in the PPG on plan preparation and engagement.

#### **Development and Use of Land**

3.8 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

## **Excluded Development**

3.9 The Plan does not include provisions and policies for 'excluded development'.<sup>7</sup>

## **Human Rights**

3.10 Section 6 of the Basic Conditions Statement states that the Forum has been mindful of the fundamental rights and freedoms guaranteed under the European Convention on Human Rights, in the process of preparing the NP. Lambeth Council has not suggested that the Plan does breach Human Rights (within the meaning of the Human Rights Act 1998), and from my independent assessment I see no reason to disagree.

#### 4. Compliance with the Basic Conditions

#### **EU Obligations**

4.1 A draft version of the Neighbourhood Plan was subject to a screening opinion for Strategic Environmental Assessment (SEA) by Lambeth Council in 2018. The Council found that it was necessary to undertake SEA. An updated version of the KOVNP was prepared in 2020, removing the policy proposals that had been considered to have potentially significant environmental effects. A second screening in 2020 concluded that an SEA was not required. Lambeth Council sought a further screening in 2024 and confirmed in July 2024 that an SEA was not required. The SEA Screening Assessment Addendum (February 2025) concluded that the

<sup>&</sup>lt;sup>7</sup> The meaning of 'excluded development' is set out in s.61K of the 1990 Act.
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- KOVNP version, which underwent consultation under Regulation 16, would not require SEA.
- 4.2 The KOVNP was further screened for Habitats Regulations Assessment (HRA). Lambeth Council found that the provisions of the Conservation of Habitats and Species Regulations 2017 did not apply to the KOVNP Area as there were no "European Designated Sites" within the NP Area. The HRA Screening Assessment (February 2025) confirms this conclusion. I note that there are four European Designated Sites within 10kms of the NP Area. However, the Lambeth Local Plan had earlier been subject to HRA screening, and it had concluded that none of the four relevant sites would experience an adverse impact. In addition, officers from Lambeth Council consulted the Environment Agency, Natural England and Historic England on the pre-submission version of the KOVNP in April and May 2024. No specific comments regarding the need for HRA were received. Natural England, in its letter of 9 May 2025 to the Regulation 16 consultation exercise on the KOVNP, stated that it had no specific comments to make on the draft KOVNP. From my independent assessment of the Plan, I agree that the KOVNP is unlikely to result in significant adverse effects on European sites or the environment more widely. Therefore, I am satisfied that the Plan is compatible with the relevant EU obligations under retained EU law.

#### **Main Issues**

- 4.3 The KOVNP should be seen in the context of the wider planning system. This includes the London Plan 2021, the Lambeth Local Plan 2021, as well as the NPPF and PPG. Accordingly, national policy advises that it is not necessary to repeat in the Neighbourhood Plan matters that are quite adequately dealt with elsewhere.<sup>8</sup>
- 4.4 Neighbourhood plans should be succinct and contain policies that are clearly written and unambiguous. A decision maker should be able to apply them consistently and with confidence when determining planning applications. In addition, the policies should be supported by appropriate evidence. A
- 4.5 The following section of my report sets out modifications that are necessary in order to meet the Basic Conditions. Some of the proposed modifications (**PMs**) are factual corrections.<sup>11</sup>
- 4.6 Having regard for the KOVNP, the consultation responses and other evidence, and the site visit, I have assessed and reported on the Plan under the following headings, which align with the main sections of the NP:

<sup>&</sup>lt;sup>8</sup> See NPPF Paragraph 16 f).

<sup>&</sup>lt;sup>9</sup> NPPF, Paragraphs 15 and 16 d).

<sup>&</sup>lt;sup>10</sup> PPG Reference ID: 41-041-20140306.

<sup>&</sup>lt;sup>11</sup> Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e). of Schedule 4B to the 1990 Act.

- Section 1: Introduction and Background
- Section 2: The Neighbourhood Area
- Section 3: Planning Policy Context
- Section 4: Community Views on Planning Issues
- Section 5: Objectives and Land Use Policies
- Section 6: Implementation.

#### **Section 1: Introduction and Background**

4.7 Section 1 of the KOVNP describes the history of the Plan's preparation and the designation of the KOVNP Area. It states that the Forum decided to create the Plan in order to identify key policy and project priorities for future investment in the built environment. Section 1 references the Basic Conditions which the KOVNP must meet, the consultation exercises which have been undertaken, and the screening for Strategic Environmental Assessment. It informs readers that, once the KOVNP has been made, Lambeth Council will take account of its policies when determining planning applications in the KOVNP Area. Section 1 ends with Map A, a map which shows the KOVNP Area. I consider that section 1 has necessary regard to national and strategic planning policy and provides helpful information for readers and users of the Plan.

#### **Section 2: The Neighbourhood Area**

- 4.8 Section 2 begins by describing the location of KOV at the edge of London's busy Central Activities Zone. Section 2 provides demographic information of the Area's population, and the Area's high level of transport connectivity is described. The high demand for development land in this part of London is resulting in tall buildings which, it is argued, can cause problems for the local community, including overshadowing and a loss of tranquillity. The benefits of green spaces for healthy and active living, and the creation of an attractive environment for residents and businesses, are described. As the KOVNP Area has been identified as deficient in access to green space (Lambeth Open Space Strategy 2013), I accept the importance of highlighting this issue. Also, the Area experiences substantial air pollution from road traffic, as described in paragraphs 2.8-2.13, and illustrated in Map B. The Plan expresses support for reduced motor travel and highlights the need for safer and greener routes to schools. In my opinion, this is consistent with national and strategic planning policies and should contribute to the achievement of sustainable development.
- 4.9 Section 2 also states that shops, services, offices, restaurants and other community facilities within walking distance of home are essential for local households, as 60% of them do not have access to cars. Map C, with modification as proposed in paragraph 1.3 of this report above, shows that the KOVNP Area includes a number of Local Centres, and paragraph 2.15 highlights 2 Local Centres at Kennington Cross and Kennington Park Road. I comment further on this information in paragraph 4.20 below. Section 2 ends with paragraphs on Development and Design, referencing

possible risks from intensive development and the spread of tall buildings in the Opportunity Area, as well as basement development underneath existing housing, which may cause subsidence and long-term nuisance from construction traffic. Better consultation and community engagement in the planning and design process in the KOVNP Area is considered necessary and has triggered the preparation of the Plan. Overall, subject to the modifications as proposed in paragraph 1.3 above and paragraph 4.20 below, I am satisfied that Section 2 adequately sets out the main characteristics and challenges of the Area which the Plan aims to address.

#### **Section 3: Planning Policy Context**

Section 3 describes the Planning Policy Context for the KOVNP, which should assist readers and users of the Plan. However, regarding paragraphs 3.2 to 3.4, these should reflect the NPPF (December 2023) and I recommend that the text is modified, as in **PM2.** Strategic planning policy in the London Plan and the Lambeth Local Plan is then briefly described, with a table listing the most relevant policies for the KOVNP Area, and with illustrations in Maps D, E and F showing where Policies PN2 Vauxhall and PN8 Kennington/Oval, of the Lambeth Local Plan, would take effect. Transport for London (TfL) requested that Policies T6 (Car parking) and T7 (Deliveries, servicing and construction) as well as D8 (Public Realm) from the London Plan, should be listed. I consider that these policies are highly relevant to the KOVNP Area and recommend that T6 & T7 are added to the table in paragraph 3.6, as in **PM2**. I note that Policy D8, also mentioned by TfL, is already covered in the Plan's table. With the above modifications in place, section 3 of the KOVNP will be in general conformity with the strategic planning policy context.

#### **Section 4: Community Views on Planning Issues**

4.11 Section 4 gives a brief account of the engagement work undertaken to involve as many people as possible through the consultation exercises. Paragraph 4.5 lists the main issues raised in early consultation, and paragraph 4.7 comments that the Covid pandemic, with lockdown and isolation, created a new reliance on public parks and green spaces, which are now much more widely recognised and valued.

#### **Section 5: Objectives and Land Use Policies**

4.12 Section 5 names five key objectives for the NP which, in my view, follow logically from the data given in sections 1 to 4. These are the basis for the NP's land use policies, and the Plan explains that they seek to respond to the challenges set by the new London Plan and the Lambeth Local Plan. TfL stated that the last objective should be amended to "Prioritise and encourage pedestrian, cyclist and public transport users' experience of our area." I agree that this would emphasise the importance of sustainable travel and propose the modification to wording in PM2. Paragraph 5.5, helpfully in my view, confirms that there are no allocations for housing development within the KOVNP Area in the Lambeth Local Plan, and

Lambeth Council has not encouraged the Forum to allocate housing sites or shape strategic allocations. As long as **PM2** is made, I conclude that sections 1 - 5 of the Plan provide a clear starting-point to the Plan's policies, and meet the Basic Conditions for neighbourhood planning.

## Policy KOV1: Local Green Spaces

- 4.13 This policy names 10 locations as Local Green Spaces (LGSs), where inappropriate development will only be supported in very special circumstances. 12 The supporting text states that the criteria set out in paragraph 105 of the NPPF were used to define the LGSs. These criteria are now set out in paragraph 106 of the relevant December 2023 version of the NPPF (the criteria remain unchanged). I recommend this modification, along with subsequent changes to also update references to paragraphs 150 and 155, in PM3 for consistency with national planning policy and to avoid confusion for readers. The NP text gives a crossreference to Appendix B of the NP, which provides detailed information and illustrations for all ten spaces. The responses to the Regulation 16 consultation exercise included a number of comments regarding Policy KOV1. Several respondents expressed broad support for the policy and all the proposed spaces, citing negative effects from massive development over the last decade. In the words of one consultee, this has made the remaining green spaces "even more vital for residents' health and wellbeing, in providing recreation and relaxation space and respite from the otherwise densely urban landscape".
- Some respondents to the Regulation 16 consultation exercise raised questions as to whether modifications should be made to LGSs ii Oval Triangle; ix Claylands Road; and x Cotton Gardens Park. The greenery around St Mark's Church with the farmer's market is clearly an important local community asset, but it is on separate land from the Oval Triangle. Therefore, I do not recommend its inclusion in LGS ii. Lambeth Council questioned whether LGSs ix & x met the criterion in the NPPF, to be demonstrably special to the local community. Having visited Claylands Road and having read Appendix B, I accept the open space is important for local residents for outdoor recreational and leisure pursuits and exercise. I also saw at my site visit that Cotton Gardens Park is situated close to high rise residential development and the busy Kennington Lane. As explained in Appendix B, the park provides an essential outdoor space for residents living in flatted accommodation, with mature trees providing a haven from the traffic and pollution on nearby major roads. I am satisfied that Cotton Park Gardens should be designated as LGS.
- 4.15 In addition, some respondents to the consultation exercise expressed concern that proposed green spaces, for example Lambeth Walk Open Space, Vauxhall Park, Old Paradise Gardens and Pedlar's Park, could be (or have been) negatively impacted by proposed and existing developments of large buildings, due to shadowing, loss of sunlight, loss

<sup>&</sup>lt;sup>12</sup> See paragraph 107 of the NPPF (December 2023).

of trees and/or overlooking. I recognise these risks to green spaces in the intensively developed KOVNP Area bordering on Central London. However, when major development close to designated LGSs is proposed, Lambeth Council will have to consider their likely impacts on an individual basis. The KOVNP adequately addresses the overall issues around intensification in my opinion, and I see no need to modify Policy KOV1.

Regarding Appendix B, I am satisfied that this provides adequate descriptions of all the proposed LGS sites, and that each one meets the three criteria of the NPPF. It is not necessary, in my opinion, to reformat the Appendix to specifically address each of the three requirements for each space. Nor is it necessary to add information as to how each space can be accessed by means of walking, cycling and public transport. However, I recommend that text is added to the beginning of the Appendix, as in **PM4**, setting out the three criteria which the NPPF specifies for designation, to reassure readers and users of the NP that regard has been had for national policy. In addition, the numbers and titles of the ten LGSs should be modified in Appendix B so that they are the same as those given in Policy KOV1 and the Policy Map. For example, "iii. Lambeth Walk Open Space, Fitzalan Street/Lollard Street" and not "[iii] Lambeth Walk Doorstep Green". PM4 should be made to achieve this, so that readers and users of the Plan are not confused and misled. With the above modifications in place, I conclude that Policy KOV1: Local Green Spaces meets the criteria set out in NPPF paragraph 106. I am also content that the LGS sites appear capable of enduring beyond the end of the Plan period (2035).<sup>13</sup> Therefore the policy, as proposed to be modified, will meet the Basic Conditions.

## Policy KOV2: Improving Air Quality

Policy KOV2 sets out 8 criteria for developers, including measures linked to air quality improvement during the construction phase, and the requirement for design and layout of new development to avoid inhibiting the dispersion of pollution, and to minimise people's exposure to pollution sources. Section 2 of the KOVNP and Map B describe the presence of poor air quality in the Area, particularly at the Vauxhall gyratory, Oval junction, Lambeth Bridge, Kennington Cross and at the inter-connecting roads. The image on Page 25 shows smog above the Vauxhall gyratory and Nine Elms and refers to the Lambeth Air Quality Action Plan. As poor quality in the KOVNP Area is mainly a consequence of road traffic emissions, I am satisfied that Policy KOV2, promoting walking and cycling as primary modes of transport, and defining five Greenways as pedestrian routes situated away from heavy traffic, air pollution and noise, has regard for national planning policy and the achievement of sustainable development. I consider that the Air Quality Action Plan, updated version 2023-25, should be described in more detail in paragraph 5.13 of the NP, as in PM5, to show general conformity with Lambeth's policies.

<sup>&</sup>lt;sup>13</sup> Paragraph 105 (NPPF, December 2023).

- 4.18 The supporting text to Policy KOV2 explains that it complements policies in the adopted Lambeth Local Plan and the London Plan. The policy expects development proposals adjacent to the Greenways to contribute financially to the streetscape and meet the requirements of Lambeth Council in its Healthy Routes' Plan and other strategy documents. Lambeth Council suggested that the Healthy Route Network, illustrated on Page 2 of Appendix A to Lambeth's Healthy Routes Plan should be overlaid on the NP's Policy Map. However, the KOVNP Forum stated that it does not have access to this mapping layer and proposed instead a hyperlink to the Healthy Route Network. I consider that this hyperlink should be added to paragraph 5.17 of the KOVNP, so that readers and Plan users can identify existing routes, routes to be delivered by Lambeth and routes to be delivered in partnership with other bodies, as in Page 2 of Appendix A of the Healthy Routes Plan. **PM5** should be made to achieve this, so that the Plan is in general conformity with Lambeth's policy.
- A number of respondents to the Regulation 16 exercise expressed support for better management of the Area's roads to reduce air pollution. The difficulties with large numbers of tourist coaches were mentioned. The needs for more accommodation for low-polluting vehicles, and more offstreet parking to service large-scale buildings, were expressed. Inclusion of Kennington Lane as a Greenway was proposed. I shall not recommend that Kennington Lane is added to the Greenways but recognise that this does not prevent additional greening actions, or small infrastructure improvements to benefit pedestrians and cyclists. I note that praise was given for the greenery added by way of plant boxes as part of the 'Kennington Oval Reimagined' project framed within Lambeth's Kerbside Strategy. Guy's and St Thomas' NHS Foundation Trust sought reassurance that healthcare facilities and services, and parking/access for NHS staff, would be exempt from restrictive measures which might impede their healthcare operations. I have seen no evidence that Policy KOV2 would close existing roads or fail to consider sympathetically the needs for good access to healthcare facilities. I am satisfied that Policy KOV2, with the inclusion of PM5, should contribute to sustainable development of the Area, and meet the Basic Conditions for neighbourhood planning.

#### Policy KOV3: Local Shops and Services

4.20 The policy aims to support and enhance the role of local centres of shops and other services, in accordance with the London Plan and Policy ED11 of the Lambeth Local Plan. Reference is made to the local shops at Kennington Cross, and these are shown on the Policy Map. Map C: Local Shops and Services, in Section 2 of the Plan, demonstrates that a wide range of community facilities is available across the KOVNP Area, as I saw at my site visit. However, in my view, there is a discrepancy between Map C and the Policy Map as to the precise location of local centres. In its responses of 7 July and 1 September 2025 to my questions, the Forum proposed the replacement of Map C, and modification of the Policy Map. I recommend that these changes are made, noting that the revised Policy

Map defines the location of Local Shops along Kennington Road more precisely. I have already recommended that Map C should be revised, as set out in PM1, which will show all the Local Centres within the KOVNP Area. Policy ED11 of Lambeth Local Plan defines 42 Local Centres across the Borough, and the Local Plan's Annex 2, shows that 10 of these are located in or partially within the KOVNP Area. I propose that these designated Local Centres are listed in paragraph 5.18 of the KOVNP, for clarification for readers and users of the Plan. PM6 (and PM7 to modify the Policy Map) should be made to achieve consistency between the Local Plan and the KOVNP, and ensure that clause A of Policy KOV3, which refers to the "defined Local Centres", can be applied effectively.

- Clause B of Policy KOV3 expects development proposals resulting in the 4.21 loss of local shops to contribute to improvements to the public realm. Lambeth Council advised that such a planning obligation would not, in most cases, be directly related, or fairly or reasonably related in scale and kind, to most development, in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). I agree with this and consider that Clause B should be modified as in PM6, having regard to national planning policy.
- 4.22 Consultation responses show strong support for the maintenance and protection of local shops and services, which add to the character of the KOVNP Area and offer everyday essentials. I am advised that, in recent years, a number of businesses and shops have closed, and that was apparent at my site visit. There is some agreement from consultees that proximity to the Vauxhall, Nine Elms and Battersea Opportunity Area with ongoing major new development could lead to the loss of more local shops. This is referenced in paragraph 5.19 of the NP, the retention of which I support. However, as Lambeth Council stated, the planning system is unable to prevent the change of use/loss of post offices, as they fall within Use Class E. I recommend that modification PM6 should include removal of the second sentence in paragraph 5.19 and should clarify that NEV Opportunity Area refers to "Vauxhall, Nine Elms and Battersea Opportunity Area". This will have regard for national planning policy and give clarity for readers.
- 4.23 Reference to market stalls and street stalls, as requested by consultees, need not be added to Policy KOV3 and its supporting text. As the KOVNP Forum pointed out, markets and street stalls are regulated through licensing, not by land use planning policies. Similarly, planning policy is unable to prevent the replacement of local shops and facilities with fast food chain outlets. As long as PM6 and PM7 are made, I conclude that Policy KOV3 and its supporting text will satisfy the Basic Conditions.

#### Policy KOV4: Community Infrastructure Premises

This policy seeks to protect thirteen premises, which are recognised for their heritage, cultural, economic or social value to the community. The named premises include community halls, public houses and libraries.

The Regulation 16 consultation responses indicate that some people wish to see additional premises on the list, e.g. The Black Prince Pub, the Tommyfield, and the Black Prince Community Centre. In response to my enquiry, the Forum stated that the named premises in Policy KOV4 had been subject to detailed research and local input. Lambeth Council raised no objection to the policy. I recognise that the intensively developed KOVNP Area contains more than 13 community infrastructure premises but accept that an analytical approach has led to selection of the named ones, and that they have broad support from local people. I am satisfied that Policy KOV4 meets the Basic Conditions. I also noted the comments, expressed by a consultee, that this section of the Plan should refer to school provision in the Area, which has experienced recent closures of primary and secondary schools. I appreciate the community's need for access to good schools. However, school provision is a matter for consideration outside the planning system, by Lambeth Council. The Council has not requested that the Plan should include comment on this issue, and I see no need to modify the Plan or add references to school provision.

#### Policy KOV5: Important Local Views

- Policy Q25 of the Lambeth Local Plan, referenced in the supporting text to Policy KOV5 of the NP, seeks to resist harm to the significance of heritage assets and landmarks in the Borough, and secure improvements within them. Panoramas, linear views, river prospects and townscape views are described as key features. The supporting text to Policy KOV5 explains the importance of local views for the KOVNP Area, which has many listed buildings and structures, notable parks and modern buildings. Also, the KOVNP Area is located southeast of the Westminster World Heritage Site; it is partly within the Central Activities Zone, and borders the River Thames, among other things. I consider that the inclusion of Policy KOV5 in the NP is a useful supplement to Policy Q25 in the Local Plan and is justified by the supporting text. One of the Regulation 16 consultees contended that the policy should not only preserve the views but should seek improvements. However, I consider that this could be too onerous for many development proposals, and do not recommend that the policy be modified as was suggested.
- 4.26 The first important view, Kennington Road to Gas Holder No.1 (KOV5A), is described and illustrated on Pages 34, 35 and 36 of the NP. Lambeth Council observed that two schemes recently granted planning permission, known as i) Oval Village, and ii) Land to the East of Montford Place, will add layers to the important view. I agree with the Council that reference to a second viewing corridor on "the western leg of Kennington Road along the northern end of Kennington Green" should be deleted from Page 36, under Visual Management Guidance. In addition, the Viewing Location Coordinates at the bottom of Page 35 should be reviewed to secure consistency with the viewing place's Description and Image/photograph. Historic England proposed additional wording to the Visual Management Guidance to provide information about the contribution of the Gas Holder

to industrial heritage and explain that the view is sensitive to new development. I support the proposed changes to the wording. **PM8** should secure the above modifications, which are needed for clarity and to meet the Basic Conditions.

- 4.27 Proposed designated view KOV5B: Harleyford Road to Oval Cricket Ground, a famous international sports venue, is clearly illustrated on Pages 37 and 38. Lambeth Council requested the removal of paragraphs 3 and 4 in the Visual Management Guidance. Having regard for my site visit and bearing in mind that these paragraphs are supporting text rather than policy wording, I am content for the sentence regarding taller buildings to be retained. However, I agree with Lambeth Council that Local Plan Policy Q22 should protect the character and appearance of the Conservation Area, without repetition in paragraph 4, and that proposed Policy KOV5 should safeguard the view along Harleyford Road. Therefore, I propose that paragraph 4 of the Visual Management Guidance on Page 38 be deleted to secure general conformity with the Local Plan, as in **PM8**.
- 4.28 View KOV5C: Harleyford Street to Oval Cricket Ground enables the Pavilion and Hobbs Gate entrance to the cricket ground to be seen from Oval underground station. Lambeth Council requested that the wording of the first sentence on Page 40 under Visual Management Guidance should be amended. I agree with the Council that "reliant" should be replaced with "supported by", to give a more accurate description. This modification is included in **PM8** for clarity.
- View KOV5D is illustrated on Pages 41, 42 and 43, with a photograph which shows the "Elephant and Castle tall building cluster" beyond the northern end of Kennington Park Road. Objection was made to the inclusion of this View in Policy KOV5 on behalf of Standard Securities Ltd, freeholders of 409 Kennington Road, where a redevelopment scheme is proposed, for a building up to 16 storeys in height, stepping down to 6 storeys on Kennington Park Road. Standard Securities contend that the Viewing Location, as described in the Plan, does not match the Image on Page 43, which represents the view from the middle of the road/on the traffic island, rather than at the junction with Harleyford Street outside the Oval tube station. I consider that the view on Page 43 would be limited to passengers in cars, buses etc travelling north on Kennington Park Road, and pedestrians walking onto the traffic island. By contrast, the view from outside Oval station gives long distance views for more people, but restricted to the eastern side of the Road, albeit with the Elephant and Castle cluster at the end.
- 4.30 Lambeth Council suggested that views of the Elephant and Castle cluster from the Oval tube station entrance lack the demonstrable importance that would justify designation. There are, it is suggested, more interesting examples of townscape views of tall building clusters elsewhere e.g. views of the Vauxhall tall buildings cluster from Vauxhall Park. However, Historic England provided additional information about the aesthetic and historic importance of the KOV5D view and proposed

additional text mentioning the alignment of the Roman Road to Chichester, the London Bridge River Crossing and historic development of the City of London. The Forum pointed out that the contrast between the tree-lined, leafy street of Kennington Park Road, and the dramatic skyline with imposing buildings in the background beyond, is the important feature.

- 4.31 From my site visit, I consider that the vista along the straight and extensive Kennington Park Road merits inclusion as an important view, and KOV5D should be retained. However, in response to Standard Securities Ltd, I recommend the addition of their photograph (or similar) depicting the view from the junction of Harleyford Street and Kennington Park Road, as a replacement for the image on Page 43. As the sentence under "Viewing Location" refers to the "dynamic view as the viewer moves along Kennington Park Road ....", I am content for the cone depicting View D to remain in place. In response to Lambeth Council's proposals, I consider that a number of modifications to the supporting text should be made. Firstly, the title at the top of Page 41 should be changed to "KOV5D Kennington Park Road into Elephant and Castle", omitting the broader and potentially confusing phrase "into City of London". The second sentence of paragraph 5.35 should also be modified to refer to the "cluster of tall buildings at Elephant and Castle", as proposed by Lambeth Council, and also to refer to the historic character of the road, as described by Historic England. The Description of View, on Page 43, should be modified in response to the Council's remark that the consistent building line frames the "western side", rather than both sides, of Kennington Park Road. These modifications, in PM8, should be made to give clarity to readers and users of the NP, and to meet the Basic Conditions.
- 4.32 In reaching this conclusion, I have taken account of the concerns expressed on behalf of Guy's and St Thomas' NHS Foundation Trust, that KOV5D could conflict with the site allocation and proposed expansion of healthcare facilities at the Wooden Spoon House, Dugard Way. However, the Forum stated, in its letter to me of 7 July 2025, that the proposed policy could withstand additional tall building development in the background of the viewing point, for example at Wooden Spoon House.
- 4.33 A number of respondents to the Regulation 16 consultation exercise expressed support for Policy KOV5, although one respondent questioned the merits of the selected views, and a small number proposed the inclusion of additional views, notably down the Albert Embankment side of the River Thames towards the Houses of Parliament. The Forum advised that, during the development of the Plan, Lambeth Council prepared and consulted on a Revised Local Views Supplementary Planning Document (SPD) (January 2024), which led the Forum to reduce the number of viewpoints in its Plan, to avoid duplication with the Local Plan and SPD. I note that the SPD includes some views across the Thames towards Parliament and the City of London and am content for Policy KOV5 of the NP to remain focused on the four named views. I am satisfied that the

selected views are the result of significant research and consultation, and that the modified Policy KOV5 will meet the Basic Conditions for neighbourhood planning.

## **Section 6: Implementation**

- 4.34 Section 6 of the NP explains the future role for an adopted KOVNP, when Lambeth Council determines planning decisions. It expresses a wish for enhanced community engagement in the design of minor and major development proposals and aims to work closely with the Council on local infrastructure improvements, including decision-making as to how and where CIL and S106 financial contributions will be invested in the Area. Section 6 puts forward six projects, beginning with Project A: Support for the Homeless, which have been put forward by the local community and should fulfil the policy objectives of the Plan. Whilst these are not strictly matters for land use planning, government guidance is clear that neighbourhood plans can separately identify wider community aspirations (albeit these will not form part of the statutory development plan).<sup>14</sup>
- Paragraph 6.3 of the KOVNP expresses the intent to achieve better local community engagement in the design process, as encouraged by the National Design Guide and Policy D3 of the Local Plan. One of the respondents to the Regulation 16 consultation exercise argued that the Plan lacks clear attention to the architectural character of the Area, and says little about building materials, frontage rhythm or height consistency. As the KOVNP is not allocating sites for new development, and seeks to avoid duplicating the Lambeth Local Plan, I see no requirement for the addition of new information on design standards. Another respondent sought the removal of the wording in paragraph 6.23 Project F: Walking and Cycling, and its replacement with new text for Bus Priority, Walking and Cycling, designed to achieve the most efficient use of road space for all transport modes. A number of detailed measures were put forward for use of different parts of the road network, and for changes to parking arrangements. These proposals, for transport planning, go beyond the scope of land use planning for the Plan and, therefore, I have no remit to make recommendations in this regard.
- 4.36 I conclude that section 6 provides a clear description of the Forum's ambitions to implement the Plan, with benefits from describing measures to meet the community's interests and contribution to sustainable development.

#### Policy Map

4.37 The Policy Map follows section 6, and I have already recommended that the KOV3: Local shops coverage should be more precisely defined. I note that Policies KOV3 and KOV4 both refer to the "Policies Map", rather than

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<sup>&</sup>lt;sup>14</sup> PPG Reference ID: 41-004-20190509.

the "Policy Map". To avoid confusion for readers and users of the Plan, I recommend that the Plan is modified to correct this error, as in **PM9**.

#### **Other Matters**

- 4.38 The Marine Management Organisation (MMO) advised that it has responsibility for preparing marine plans for English inshore and offshore waters, and set out policies from the South East Inshore Marine Plan that it considers relevant to the KOVNP Area. A reference to the South East Inshore Marine Plan was requested by MMO. However, the Forum, in its letter to me dated 7 July 2025, denied the need for such a reference. The Port of London had no comments to make on the KOVNP. Having read the MMO's summary notes of its Plan, I agree with the Forum and recommend no modification to the KOVNP.
- 4.39 I note the comments made by consultees about the Area around the Oval cricket ground. Match days bring noisy crowds to the Area, with additional traffic and on-street rubbish. Past traffic management and public realm measures are criticised by some local people as ineffective or insufficient. The Oval tube station is seen as needing better maintenance, with better public toilet provision. I sympathise with these comments and hope that implementation of the Plan, as in section 6, will enable some of the sought-after local improvements to be achieved in future years. However, I propose no modifications to the KOVNP, to specify exactly how such improvements will be achieved. Neither do I consider that the Plan should comment on investment-based housing developments which have vacant dwellings, as this matter sits outside the scope of neighbourhood planning.
- One of the consultees expressed support for paragraph 2.20 of the NP, which acknowledges the need for better consultation and community engagement in the planning and design process in the KOVNP Area. The London Fire Brigade's development of its headquarters on the Albert Embankment, and impact on Black Prince Road is referenced. I appreciate the need for discussion of the identified potential impacts particularly with Lambeth Council who are the decision-makers, but do not consider that the KOVNP should be amended to address this topic. Swifts Local Network requested an additional policy to protect swifts and other building-dependent bird species, such as house martins. I note that some local authorities have included such policies in their Local Plans but have not been informed of other Neighbourhood Forums which have done so. I do not recommend that a policy is added to the KOVNP on swift bricks. I have considered all the other representations made on the submitted KOVNP but have no additional comments to make or modifications to recommend.

#### **Minor Matters**

4.41 Further minor amendments, which fall outside my remit (i.e. principally, to make recommendations only where they are necessary in order to

satisfy the Basic Conditions) might include incorporating factual updates, correcting inaccuracies, typographical and punctuation errors. For example I note that TfL expressed support for Project F, but indicated that it should deliver initiatives to make our streets "walking and cycling friendly" rather than "pedestrian and cyclist friendly". There is also a minor typographical error in the last sentence of paragraph 6.19. No alterations of this nature should affect the ability of the Plan to meet the Basic Conditions and could be undertaken as minor, non-material changes. 15

#### 5. Conclusions

- 5.1 The Kennington, Oval and Vauxhall Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

#### The Referendum and its Area

5.3 I have considered whether or not the referendum Area should be extended beyond the designated Area to which the Plan relates. The KOVNP, as modified, has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I note that the nearby South Bank and Waterloo Neighbourhood Forum expressed support for the KOVNP, stating that its themes resonated with those of its own Neighbourhood Plan. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated KOV Neighbourhood Plan Area.

#### **Overview**

5.4 I recognise the difficulty of producing a neighbourhood plan for this part of London, which is so close to Central London, where much major new development has taken/is taking place, changing the built environment significantly. The KOVNP Area is close to major transport hubs at Vauxhall, Waterloo and Lambeth Bridge, with the A3, A23 and A3036 generating high levels of through traffic. Residents and businesses in the KOV Area live and operate in an intensively developed urban area, with high levels of air pollution, particularly along the main roads. The period

<sup>&</sup>lt;sup>15</sup> PPG Reference ID: 41-106-20190509.

of plan preparation was interrupted by the Covid pandemic. In my view, the Forum has listened to local people and addressed the key challenges for the Area, putting forward policies which should help deliver an environment for healthy and safe communities in the future. I commend the Forum for its hard work over a number of years, and for the production of this NP.

Jill Kingaby

Examiner

# **Appendix: Modifications**

<u>Note</u>: Additional text is shown in **bold italics** and deletions are shown with strikethrough.

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 11	Map C
		Revise title as follows:
		Local Shops and Services
		Source: LB Lambeth
		Strategic Designations (from the London Plan and Lambeth Local Plan), and major land-use and transport features.
		Delete existing Map C and replace with the new Map produced by Lambeth Council on behalf of the Forum, as received 1 September 2025. <sup>16</sup>
PM2	PM2 Pages 13, 14 & 20	Revise as follows:
		3.2 The most recent version This Neighbourhood Plan has been prepared in accordance with the version of the National Planning Policy Framework (NPPF) was published by the Government in December 2023 2021 and which is the most important guide in determining
		3.3 The following paragraphs of the NPPF are considered especially relevant to the KOV Plan, given its scope and intent:
		• Pre-application engagement (§38 and §39 and \$40)
		[note: the remaining bullet point NPPF paragraph references remain correct].
		3.4 At the time of submission of the KOV Neighbourhood Plan revisions to the NPPF is currently under consultation. It is expected to

https://www.lambeth.gov.uk/sites/default/files/2025-09/20250827 KOVNeighbourhoodForum-ResponseToAdditionalQuestion redacted1.pdf Intelligent Plans and Examinations (IPE) Ltd, 3 Princes Street, Bath BA1 1HL

PM2 (cont.)	Pages 13, 14 & 20 (cont.)	be published towards the end of this year A revised NPPF was published on 12 December 2024. However the NPPF December 2024 version was not applied for the purposes of the examination of this Plan.*
		*Add footnote: View the transitional arrangements at paragraph 239, NPPF (2024): https://www.gov.uk/guidance/national-planning-policy-framework/annex-1-implementation
		3.6 Add to the table:
		London Plan 2021 policies:
		<ul> <li>T6 Car parking</li> <li>T7 Deliveries, servicing and construction</li> </ul>
		Objectives
		Amend as follows:
		5.1 The key objectives
		Prioritise <b>and encourage</b> pedestrian, cyclist
PM3	Page 22	KOV1: Local Green Space
		Revise as follows:
		5.7. This policyaccordance with $\frac{\$105}{\$106}$ of the NPPF(unless exempted by the NPPF $\frac{\$150 \text{ or } \$155}{\$152 \text{ or } \$156}$ ),
PM4	Pages 58-	Appendix B: Local Green Spaces (KOV1)
70	Insert new text at the top of Page 59 as follows (i.e. below the images on Page 58):	
		Local Green Spaces
		The NPPF states that Local Green Space designation should only be used where the green space is
		a) in reasonably close proximity to the community it serves; b) demonstrably special to the local community and holds a particular local significance, for example

PM4 (cont.)	Pages 58- 70 (cont.)	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.
		The Spaces described below comply with these selection criteria.
		Modify the numbers and titles of the Local Green Spaces described in Appendix B, so that they are the same as those in Policy KOV1, as explained in paragraph 4.16 above.
PM5	Page 25	KOV2: Improving Air Quality
		5.13 Add new sentences as follows to the end of this paragraph:
		Lambeth Council's Air Quality Action Plan 2017-22 was updated 2023-25. It outlines action that will be taken to improve air quality and better public health outcomes, and to break the connection between inner-London living and poor air quality. The Air Quality Focus Area around Vauxhall is indicated on Map C.
		5.17 Add the following text to the end of this paragraph:
		The Healthy Route Network can be found on Page 2 of Appendix A of Lambeth Council's Healthy Routes Plan.
		https://www.lambeth.gov.uk/transport- strategy/healthy-routes-plan
PM6	Page 11	Map C: Local Shops and Services
		Remove from the NP (see PM1 above).
	Page 26	KOV3: Local Shops and Services
		Delete existing clause B and modify as follows:

PM6 (cont.)	Page 26 (cont.)	B. Major development proposals in Local Centres and on neighbouring sites will be expected to contribute to the improvement of the immediate public realm, to ensure space exists for local people to stop and rest, dwell and interact, promoting a usable, attractive and cohesive neighbourhood.
		Add the following text to the end of paragraph 5.18:
		Policy ED11 relates to 42 Local Centres in the Borough of Lambeth, ten of which are located in the KOV Area. These are Wilcox Road, Kennington Lane, Kennington Park Road/Kennington Road, Kennington Cross, Oval (Clapham Road), Oval (Brixton Road), Vauxhall Steet/Jonathan Street, Lambeth Walk and Black Prince Road.
		Delete the second sentence in paragraph 5.19, and amend the third sentence as follows:
		Parts of the KOV Areaneed safeguarding from the closure of shops and services, where possible, in particular because of their proximity to the NEV Vauxhall, Nine Elms and Battersea Opportunity Area, where major new development is envisaged.
PM7	Pages 49- 51	Modify the Policy Map to define the Area of KOV3: Local Shops more precisely.
PM8	Pages 32-	KOV5: Important Local Views
	43	<b>KOV5A:</b> Review and amend Viewing Location Coordinates at the bottom of Page 35.
		Modify the Visual Management Guidance wording on Page 36 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.

PM8 (cont.)	Pages 32-	New development viewing corridors.
	43 (cont.)	<b>KOV5B:</b> Delete the fourth paragraph under "Visual Management Guidance" on Page 38.
		<b>KOV5C:</b> Under "Visual Management Guidance", first sentence on Page 40 – <b>delete</b> the words <del>reliant on</del> and replace with <b>supported by</b> .
		KOV5D: Kennington Park Road into the City of London Elephant and Castle – the title at the head of Page 41 should be modified accordingly.
		5.35 The view of the tall buildings international city, the cluster of tall buildings at Elephant and Castle. It is a reminder of the historic development of London, as Kennington Park Road follows the alignment of the old Roman Road from the City of London across London Bridge towards Chichester. In seeking to comply
		The image (photograph) at the top of Page 43 should be deleted and replaced with either the photograph submitted by Standard Securities/Rolfe Judd Planning Ltd/ R055a of the Regulation 16 consultation document, or an identical photo from the same standpoint.
		Description of View (Page 43): Modify the first paragraph to read:
		The view along Kennington Park Road along both sides the western side. Mature tree planting
PM9	Page 49	Kennington, Vauxhall and Oval Neighbourhood Plan Policy Map Submission Plan December 2024
		Amend the title of the Policy Map to accord with the title of the NP document i.e.  Kennington, Oval and Vauxhall Neighbourhood Plan
	Pages 26 & 29	Policies KOV3 and KOV4

PM9 (cont.)	Pages 26 &	Modify the first sentence of both policies to
	29 (cont.)	refer to the <b>Policy Map</b> and not the <del>Policies</del>
		<del>Map</del> .
	1	