

Appendix 3 Consultation responses to Kennington, Oval and Vauxhall Neighbourhood Forum application

Summary of Representations

	Total Number of Representations	Number of representations from Individuals	Number of representations from Organisations	Organisations
Support	92	87	5	Waterloo Community Development Group; Morley College London; Beaconsfield Ltd; 2 Residents' Associations.
Neutral or no comment	10	5	5	Sport England; Historic England; Highways England; Natural England; Transport for London.
Objections	11	9	2	2 Residents' Associations.
Unrelated	3	3	0	n/a
Total	116	104	12	

Representations classed as objections, with officer response

(Note: some representations may contain mixed comments)

Reference	Respondent	Representation	Officer Response
KOV001	Individual	I support the application to re-designate Kennington, Oval and Vauxhall Neighbourhood Forum (KOV) as a neighbourhood planning forum. However, I do believe they should do more to pro-actively ensure that their board members are more representative of the local area; currently, that is not that case. They should be required to submit a diversity audit of their membership	Support noted. The legislation sets out the membership conditions that a forum needs to satisfy and directs the local planning authority to additional factors to take into account in assessing the application. The report sets out the information provided by the Forum about the

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		and council members at least once every three years, as part of their annual report.	steps taken to engage with different sections of the community.
KOV006	Residents' Association	<p>I write to express my concern about KOV Forum being re-designated as the neighbourhood planning forum for this area without some major changes in the way it is run and managed currently.</p> <p>When the KOV Forum was time expired previously there were many questions about the lack of diversity in its membership and management. There were further concerns about the lack of inclusiveness in terms of how meetings, events and decisions were publicised in the local community thereby questioning the transparency of the organisation.</p> <p>This area has a vast amount of development activity and a community voice is essential and much needed but it must of course be representative and accountable.</p> <p>I hope these comments are helpful and any organisation which is given designation of this role is monitored and good governance is put in place.</p>	<p>Objection noted. The application has been assessed against the criteria contained in the legislation. It is not considered that views about the ways in which a neighbourhood forum may be managed or its meetings conducted would in themselves amount to a valid reason to refuse an application.</p> <p>KOV has provided information about the steps it has taken to encourage a diverse membership, as explained in the report.</p> <p>This report including this table of representations received will be available to the Forum.</p>
KOV009	Residents' Association	<p>The committee of the Heart of Kennington Residents' Association is not opposed to neighbourhood plans but we do not support the redesignation of KOV as the Neighbourhood Planning Forum for this area.</p> <p>We do not think that as at present constituted KOV is a sustainable organisation that can fulfil the role envisaged for a neighbourhood planning forum. We also have serious doubts about KOV's claims about its democratic credentials and governance: The list of names of 'members' of the KOV executive on the application includes several people who are no longer active in the area and is not up to date. There is no information about the organisations the 'members' are supposed to represent. KOV currently has no active chair and has not held an annual general meeting since 2018 (the</p>	<p>Objection noted. The report explains the steps taken by officers regarding verification of the membership information provided by KOV.</p> <p>It is not considered that perceived concerns about the way in which a forum has operated would amount to sufficient reason to refuse the application, if the forum can show that it has met the conditions laid down in the legislation and where the local planning authority is satisfied about the steps taken by the</p>

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		application makes that clear). Apart from the involvement of a few individuals in preparing the draft neighbourhood plan, there have been no activities of the kind described in the application for two or three years. We therefore think that the application for redesignation should be refused.	organisation to encourage membership from different places and sections of the community. As noted in response to KOV006, this table of representations will be available to KOV.
KOV017	Individual	I don't feel the KOV has achieved very much in the last 5 years, and am uncomfortable with them receiving this designation for a further 5 years. I would prefer that the area is represented by smaller neighbourhood planning forums that cover more discrete parts of the borough, as frankly this area is much too big for a small amateur group to represent adequately.	Objection noted. However the criteria for designation of a neighbourhood forum are focussed on the nature of the organisation's membership, rather than on the degree of progress or otherwise towards preparation of a neighbourhood plan. It is not considered that it would be a valid reason to refuse designation because of concerns about the extent of the Forum's achievements. The neighbourhood area was designated by the Council in July 2015. The extent of that area is not reviewed as part of the application for re-designation of the neighbourhood forum. The neighbourhood planning provisions introduced by the Localism Act 2011 are directed towards encouraging the involvement of people and businesses in planning for their local area, to sit alongside (not to replace) planning at borough and London-wide levels.
KOV045	Individual	In principle, I have no objections. However this is subject to the caveat that the Forum pays equal attention to all of the designated area, rather than being Vauxhall centric, which is the perception of the forum to date. In particular the interface between the KOV area and Southwark should be	Comment noted. However, assessment of an application for re-designation needs to be focussed on whether the organisation meets the applicable criteria for designation relating to the nature of its

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		borne in mind, particularly in the vicinity of Elephant and Castle which is seeing particular development pressures.	<p>membership, rather than on how the organisation may approach local planning issues going forward.</p> <p>The re-designation process does not extend to any assessment of the possible content of any neighbourhood plan that may be produced by the Forum or the approach of the Forum to local planning issues more generally.</p> <p>As also noted in response to KOV006, this table of representations will be available to KOV.</p>
KOV062	Individual	I hesitate to support any such group on the grounds that Nimbyism rises in direct correlation to increasing property values. Planning should have less red tape, not more. I do not see this as viable course for creating more affordable homes that are desperately needed.	<p>Comment noted. However as set out in response to KOV045, the assessment of the designation application does not extend to any assessment of the possible content of any neighbourhood plan that may be produced by the Forum.</p> <p>The operation of the planning system more broadly is not a matter that can be taken into account in assessing whether to re-designate the Forum.</p>
KOV098	Individual	I'm not sure I really understand what the implications are and how this effects me as a resident and why I have been sent this now, but never before and I have lived in the borough for over 25 years. I know that currently there are a vast number of very controversial planning applications. However, it would appear that regardless of what local neighbourhoods say, the council has their own criteria for judging whether a development is appropriate or not – <i>[comment not reproduced as not related to the neighbourhood area]</i> How will this forum help with such matters?	<p>This consultation relates to the re-designation of KOV neighbourhood forum as the original designation expired in July 2020 after five years.</p> <p>Other matters, such as the process for arriving at decisions on individual planning applications, are not able to be taken into account in deciding whether to re-designate an organisation for neighbourhood planning purposes.</p> <p>If a neighbourhood forum produces a neighbourhood development plan which is adopted, that plan will</p>

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			form part of the statutory development plan for the neighbourhood area and so will be taken into account in the determination of planning applications, alongside other relevant considerations.
KOV099	Individual	I object to KOV Forum being redesignated as a neighbourhood planning forum. It is time for fresh faces and voices. KOV Forum does not seek out or represent the views of local residents. It is not transparent in the way it operates. Its comms is poor-to-non-existent and the website and Facebook site is very out of date (at time of writing, the last updates were from 2018). At such an important time for London and Lambeth's planning, with huge changes in the capital and borough, we need new energy and momentum.	Objection noted. The basis on which the re-designation application has been assessed is explained in the report. It is not considered that it would be a valid reason to refuse re-designation because of an expressed wish to have a new organisation come forward; this is concerned with views about the activity of the Forum rather than with its composition. As also noted in response to KOV006, this table of representations will be available to KOV.
KOV100	Individual	This seems a logical step for KOV Forum, which has largely (but by no means exclusively) functioned as a place for community consultation on planning decisions. If it helps to focus the body's purpose and give it a new lease of life then I endorse it. It might be good if there's a mechanism in place to ensure that local Tenants and Residents Associations are formally plugged into and consulted by the Forum, but in a way that enables KOV Forum to remain nimble and light in its feet. I'd also like there to be a way to make sure that this isn't simply a way of legitimising all the usual whining and nimbyism that any planning proposal inevitably generates. The Forum needs to be mature, realistic and constructive in its approach to planning applications, and not just a place for self-appointed Council bashers to bang their drums, which is very tedious for the rest of us who want to engage constructively.	Comment supporting the re-designation is noted; however, concern over the detail of the way in which a neighbourhood forum may operate is not considered to amount to a reason to refuse an application for designation. As also noted in response to KOV006, this table of representations will be available to KOV.
KOV104	Individual	I am completely opposed to an unelected group having such power over the plans for our local neighbourhood planning. This is a way of removing local people's views from the planning process and would mean that only a few	Objection noted. However, the provisions concerning the designation of an organisation as a neighbourhood forum do not include a requirement for its members

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		<p>people's voices would count. <i>[comments not reproduced as not directly related to the decision in question]</i>. Undemocratic, unrepresentative and open to abuse. I am against.</p>	<p>to be elected. The conditions which a neighbourhood forum has to meet in terms of the composition of its membership are laid down in legislation.</p> <p>If a neighbourhood plan is prepared by a neighbourhood forum, it must go through a referendum process to determine whether it should be adopted. If there is insufficient support for it amongst those voting, it does not move forward towards adoption.</p> <p>As also noted in response to KOV006, this table of representations will be available to KOV.</p>
KOV108	Individual	<p>As a business in the Vauxhall/Oval area I do not believe that the proposed organisation is wide enough in its consultation or representative enough in its make up to be a planning voice for such a wide and changing area.</p>	<p>Comment noted. However the conditions for forum designation are already focussed on whether an organisation has a minimum membership of 21 individuals who live/work in the area or who are an elected member, and on the desirability of designating an organisation that has members drawn from different places and from different sections of the community. It is not considered that concerns about how a neighbourhood forum may organise consultation would be a valid reason in itself to refuse designation.</p>

Three further responses were received that were unrelated to the proposed re-redesignation of the neighbourhood forum.