

Representation	Officer Comments
<p data-bbox="188 317 501 347">Camberwell Area Vision</p> <p data-bbox="188 357 338 424">Individual NSPPSV14.1</p> <p data-bbox="188 467 1167 603">I am writing to about your recent Camberwell vision plan which is excellent. In particular the new Camberwell station is so very needed. The resulting plaza made from the bus parking opposite would open up the area and create excellent regeneration.</p> <p data-bbox="188 611 1095 678">To change the car repair garages on Camberwell Station road to more social business would be highly positive.</p> <p data-bbox="188 686 978 716">I myself would start a new business - coffee shop etc - in this area.</p> <p data-bbox="188 724 1137 823">By regenerating this area and providing a new station it links Camberwell with Matt's Field, Loughborough Junction and Camberwell Green in a highly positive way. Currently it is isolated.</p> <p data-bbox="188 831 1137 898">To take any bus traffic away from the green would also be a dramatic quality of life improvement for residents.</p> <p data-bbox="188 906 1167 1070">My last comment is the Camberwell lacks a low traffic shopping Street (like Deptford High Street, Broadway Market). Here, with Camberwell Station Road is a unique opportunity for such an area. I am sure this will be very positive indeed. Camberwell has been poorly served for transport and missed out on the Tube. Please do implement the station plan.</p>	<p data-bbox="1202 467 1290 497">Noted.</p>
<p data-bbox="188 1080 506 1147">Organisation: LB Lambeth NSPPSV333.1</p> <p data-bbox="188 1190 1160 1366">We note that a number of the site allocations in around Camberwell and Dulwich allow for the provision of new extra care homes. Has the need for this specialist accommodation, in this location, been discussed with the Lambeth clinical commissioning group, in the context of the emerging market position statement for adult social care in the two boroughs?</p> <p data-bbox="188 1406 1160 1436">There is still no mention of the clinical commissioning group (CCG). This point has</p>	<p data-bbox="1202 1080 2045 1216">Extra care homes requirements have been removed from the site allocations due to proposals for housing of this type to be considered under the 'Housing for older people' policy. Any identified need will be addressed in the Southwark Housing Strategy.</p>

not been addressed.

Organisation: Friends for Burgess Park  
NSPPSV62.5

The Camberwell area vision is not an isolated island and must make appropriate linkage to the areas around it. This is particularly so for the Burgess Park area which sits between the districts covered by the area visions.

Recent consultation undertaken by Southwark Council (2015) to assess the impact of the Burgess Park revitalisation (2012) identified the strong local interest in the heritage of the park and the importance of retaining features which located the park within its industrial heritage.

This is especially important to be considered with the Georgian and Victorian heritage of the area and industrial heritage. The new draft London Plan 2017 (page 100 figure 7.4 Outline character map of London) indicates that Southwark benefits from Georgian planning and growth and Victorian entrepreneurship. Both are relevant to the Camberwell area and are positive heritage assets.

Alternative wording for the Camberwell Area Vision should specifically identify that the area around Burgess Park should retain buildings which evidence the historic industrial landscape.

The Camberwell area vision is not justified because it has insufficient evidence about existing townscape, character and context to ensure that height scale, massing and arrangement respond positively to the existing townscape and character as required by Policy 11 Design of Places.

There are a number of well-loved local landmarks which are distinctive features on the skyline and contribute to the overall character and sense of place: three examples are St Giles' Church spire (Peckham Road), St George's Church belfry and the chimney of the old bath and washhouse (Well's Way). Many properties across Camberwell will have line of sight to these important buildings.

It is not the intention of the Area Visions to go into great detail. Site allocations where relevant consider the character and townscapes of the sites.

Other policies in the Plan will be considered within any development in Camberwell, e.g. Policy P12: design of places, P13: design quality, P19: conservation areas. As such, the heritage, setting and character of the area will be protected through these policies.

Policy P16 has been amended to include the site allocations that have potential for tall buildings.

The NSP does not provide detailed guidance regarding appropriate building heights as this should be determined through a detailed design assessment of genuine development proposals in relation to their context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).

A revised tall buildings background paper has been prepared to support the New Southwark Plan. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's where relevant. It should also be acknowledged that this document and its policies must be read as a whole. Tall building development will be assessed against all policies in the NSP, including policy P16: tall buildings to understand the impact and suitability. This ensures that developers pay regard to all possible factors and constraints relevant to the site when developing, and that tall building development is correctly implemented.

The importance of retaining and creating views and vistas to local landmarks and green spaces needs to be more positively stated than currently.

The height and massing of buildings along the south side of Burgess Park should be specified in the Camberwell Area Plan to take account of the narrowness of the park and to avoid the park being dominated by tall buildings on all sides.

The Camberwell area vision describes the park and should include additional wording:

Burgess Park is an important green space in central Southwark. Due to its narrow width it is not appropriate for it to be ringed with tall building. Tall buildings are currently located at the west end of Burgess Park along Walworth Road and the east end of the park on Trafalgar Avenue. Tall buildings are also along the northern boundary on Albany Road (Aylesbury Estate and the planned new developments already approved)

The Area Vision for Old Kent Road recognises Burgess Park and recognises it as an important green space.

Organisation: TfL City Planning  
NSPPSV181.15

The third bullet point could include specific mention of the need for development to support expansion of cycle hire into Camberwell.

The Area Vision for Camberwell states development should prioritise walking and cycling and improve public transport and the road network. This includes supporting cycle hire into Camberwell. P50: Cycling within the NSP covers the provision of cycle hire schemes within the borough.

Individual  
NSPPSV211.3

This policy is not positively prepared as some aspects of the policy are vague or unclear. The Camberwell area vision does not provide adequate guidance on

It is not the intention of the Area Visions to go into great detail. Other policies in the Plan will be considered within any development

heritage, townscape or character.

The Camberwell area vision does not give a detailed overview of how tall buildings are implemented into Camberwell town and beyond. This policy is not justified as it involves a significant policy change from the previous policy on tall buildings.

This policy is not effective as it fails to provide sufficient guidance when read in conjunction with Southwark's policies on Design of Places D11 and Tall Buildings P14.

This policy is not sound because it is not consistent with the draft London Plan 2017 (p100 figure 7.4 Outline character map of London) which highlights that Southwark benefits from Georgian planning and growth along with Victorian entrepreneurship. Any proposed building needs to consider the existing character, listed status, conservation and heritage of the area and needs to be appropriate in mass and height.

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Individual  
NSPPSV219.6

This policy is not positively prepared as some aspects of the policy are vague or unclear. The Camberwell area vision does not provide adequate guidance on heritage, townscape or character.

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Individual  
NSPPSV237.1

As the centre of a major transport interchange with a rich mixed-sector heritage in manufacture, trade and financial services, the character of Camberwell is threatened by designations which focus on housing without an evidence-led approach for balancing this with the importance and viability of local jobs, goods and services.

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The Mayor of London has set a housing target for Southwark to deliver in the London Plan and the Draft London Plan, there is also a need to encourage economic growth, therefore as required by the NPPF, we need to identify and allocate sites to deliver housing, employment and commercial floorspace needed, making use of previously developed land. As such, the site allocations have been formulated through

Examples are the conversion of shops to residential with no social housing benefit. There is a trend of growing car ownership in Camberwell, but there has been no study of the amount of custom exiting Camberwell by car to drive-in supermarkets. Therefore no accurate determination can be made of the viability of local commercial uses, even if they appear to have fallen into decline.

There is no reason not to build significant amounts of housing in Camberwell, but the suggested policy is not led by data on goods and services need and impact, including the collection of area-wide shopping habits by transport mode. No evidence is provided that people walk or will walk 10 minutes to the town centre, or that they do not or will not drive to supermarkets as an alternative.

Failure to include analysis of car ownership and car use habits by locals means that the policy is not evidence-led as recommended by the NPPF, so is not sound. I would be happy to offer a solution if asked to the Hearing.

AV.04.1: "Local shops on parades on Vestry Road and Camberwell New Road are also highly valued." This is not sufficiently precise –valued by whom, and for what? It also implies Vestry Road and Camberwell New Road are similar in scale, history and potential growth, which is not the case. Camberwell New Road contains two linked shopping parades with warehousing including Anish Kapoor's studios. It has huge passing trade and is key to preserving the identity of the area and its quality of walkable space. Please see above comments on "P30 Town and Local Centres/Table 9" for further details on why a new local centre should be created on Camberwell New Road in order for this NSP policy to be sound.

AV.04.2 Provide as many homes as possible while respecting the local character of the area." This really means just provide as many homes as possible, with no evidence-based or definable check on the scope of development. There is no mention of the impact of rising car ownership on local housing, goods, services and jobs. This lack of definition and omission of a key variable means the policy is not evidence-led, contrary to National Planning Guidance and the London Plan, so is unsound.

evidence. Planning applications on these sites will be considered on a case by case basis with consideration of all the policies of the Plan.

A Southwark Retail Study has been prepared which supports our Town Centre policies.

The site allocations have been drawn from a number of sources, as identified in the New Southwark Plan Evidence Base: Site Allocations Methodology Report.

Other policies in the Plan consider car parking in residential and town centre development (Policy P53 and P54).

It could be made sound by:  
- including a reassessment of local shopping habits (including driving),  
- opening up the design of the kerbside to cater to the pedestrian majority, by offering alternative kerbside uses, to be decided by majority vote,  
- designating a new local centre on Camberwell New Road, to balance the intensity of new housing and act as a fulcrum for increased need for goods, services and a local recycling hub,

Individual  
NSPPSV295.3

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant

No

Do you consider that the New Southwark Plan is sound? - Soundness

No

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not: Justified

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not: Effective

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not: Consistent with national policy and the London Plan

Do you consider that the New Southwark Plan is unsound because it is not: Positively Prepared

Noted.

Individual  
NSPPSV 296.3

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant  
No

Do you consider that the New Southwark Plan is sound? - Soundness  
No

Do you consider that the New Southwark Plan is unsound because it is not:  
Justified

Do you consider that the New Southwark Plan is unsound because it is not:  
Effective

Do you consider that the New Southwark Plan is unsound because it is not:  
Consistent with national policy and the London Plan

Do you consider that the New Southwark Plan is unsound because it is not:  
Positively Prepared

Noted.

Individual  
NSPPSV 299.1

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant  
Yes

Do you consider that the New Southwark Plan is sound? - Soundness  
No

Noted.

Do you consider that the New Southwark Plan is unsound because it is not:  
Justified

Do you consider that the New Southwark Plan is unsound because it is not:  
Effective

Do you consider that the New Southwark Plan is unsound because it is not:  
Positively Prepared

Individual  
NSPPSV324.2

Only four of the development opportunity sites in the Area Vision for Camberwell make provision for public open space. Many studies show the benefits of green space for people's mental and physical health, and all new developments should be built with this in mind; trees and other planting should be integral to the housing and planned alongside utilities and other infrastructure – not added as an afterthought.

Page 16 of the NSP states of aim of "50% of all new homes as affordable homes". Despite this the Camberwell plan does not contain a single mention of affordable homes or council housing. This suggests ineffective development of the stated aims and is also inconsistent with Southwark Council, London and national house building policy. The housing crisis across London is one of affordability and cannot therefore be addressed simply in terms of the number of homes built. For example, on the new South Gardens complex at Elephant Park, all 51 homes have been sold to overseas investors. In Camberwell, properties at Elmington Green, currently under development, are also being advertised as "suitable for investors". With rents for two-bedroom flats in Southwark now averaging £2,400 per month, developments such as these are clearly not meeting the needs of local people for genuinely affordable rented property. Both South Gardens and Elmington Green are on sites formerly occupied by council housing. The net loss of council homes in Southwark is helping to increase rent inflation by forcing people into the private rented market where there is no guarantee of affordable rents. Similarly, the NSP

As set out in the Southwark Open Space Strategy, Camberwell is relatively well served by open space, with a good distribution of small parks within Camberwell and relatively good access to larger spaces outside of the sub-area. Any residential development proposed will be required to comply with Policy P14 (residential quality of design) which sets out requirements private and communal amenity space.

The Camberwell Area Vision and Site Allocations do not set out the provision of affordable homes as the requirement for affordable housing in development is set out in Policy P1 (social rented and intermediate housing). The purchase of properties or land by overseas investors cannot be controlled by planning policy. Policy P1 requires the provision of affordable housing with the maximum viable amount provided. In addition, the council can only control bringing empty homes back into use when they are in the Council's ownership.

The Mayor of London has set a housing target for Southwark to deliver in the London Plan and the Draft London Plan, there is also a need to encourage economic growth, therefore as required by the NPPF, we need to identify and allocate sites to deliver housing, employment and commercial floorspace needed, making use of previously developed land. As such, the site allocations have been formulated through

does not address the purchase of land and property by foreign investors or the sale of public land to private developers.

The identification in the Camberwell Area Vision of privately owned sites potentially suitable for redevelopment is likely to have the effect of increasing the value of these sites on the open market, and so increasing the cost of any homes subsequently built there and the eventual affordability for local people.

While powers of compulsory purchase to bring empty homes back into use are an effective way to increase affordable housing provision there is no mention in the entire plan of using the powers in this way. The only mention is the “compulsorily purchase [of] land when necessary” (page 14) which is an ineffective use of the powers compared to bringing empty homes back into occupancy. Provision should be made within the NSP to use powers to bring affordable housing back into the market.

The Camberwell Area Vision needs specific mentions of areas that have been identified for the development of truly affordable housing or overall aims of the NSP, Southwark Council and the Mayor of London will not be effectively achieved.

The Camberwell Area Vision has not been positively prepared in respect to flooding and is not consistent with Policy 69. Given the density of development proposed in the Camberwell Area Vision, there is not evidence that adequate consideration has been given to appropriate strategies to reduce the risk of surface water flooding. This level of development is also not justifiable without proper evidence of thorough consideration of issues such as increased flood risk. Though the NSP mentions ‘urban greening’ to reduce flood risk this does not seem to have been translated into the Area Vision.

There should be evidence of the strategic goal of 'urban greening' to tackle flood risk throughout the NSP area visions to ensure the Strategy has been positively prepared and effectively tackles flood risk.

We do not support tall buildings, or buildings above the height of existing development, in the central Camberwell area, as these would be detrimental to

evidence. Planning applications on these sites will be considered on a case by case basis with consideration of all the policies of the Plan.

Any planning application will need to be assessed against Policy P67 (reducing flood risk) and if a site is in Flood Risk Zone 2 or 3 or the site is more than 1ha in Flood Zone 1 or a major application Flood Risk Assessment will be required and the planning application determined accordingly as set out in the Council's validation checklist. As such, flood risk does not need to be considered in the Area Vision.

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Policy P20 (conservation of historic environment and natural heritage) and Policy P19 (conservation areas) set out further detail in terms of

the town centre's Victorian and Edwardian heritage. Despite stating (page 163) that development in Camberwell should "provide as many homes as possible while respecting the local character of the area" and "enhance the local historic environment" the Camberwell plan then goes on to suggest (page 166, 168, 171) that the selected redevelopment sites "could include taller buildings subject to consideration of impacts on existing character, heritage and townscape". Taller buildings are not achievable alongside the stated goals as they would clearly not be in keeping with the local historic environment or the character of the area. Also 'consideration of impacts' does not commit to full consultation with the local community.

There should be a commitment to a full consultation with all affected parties during the planning process for any tall buildings.

As demonstrated above the Camberwell Area Vision is not internally consistent which needs to be rectified with clearer explanations on what "respecting the local character of the area" and "enhance the local historic environment" actually mean.

The Camberwell Area Vision and P66 are not consistent. Camberwell Green Road junction is already extremely busy and has recorded some of the highest levels of air pollution in London. Despite this the Camberwell section of NSP suggests that more large shops would benefit the area (page 163). We believe that the increase in traffic (already at unsustainable levels) coming into the area that this would cause has not been properly taken into account and is unjustifiable: Camberwell is not a suitable location for large shops. Similarly, the only mention of the Camberwell Green Road junction is a desultory reference to "improve safety and reduce congestion" (page 163). It is particularly disappointing that Southwark Council and TfL have so far failed to come up with a revised plan for the Camberwell Green Road junction, following their last consultation in 2015. New proposals are needed urgently, and we believe lack of a proper plan puts into question whether the Camberwell Area Vision has been objectively assessed and whether it could be effectively put into practice.

'respecting the local character' and 'enhancing the local historic environment', these policies will be considered where relevant within planning applications.

Any planning application for development, including new, large shops will be assessed against Policy P64 (air quality) and will have to include design solutions to address the impacts of poor air quality on building occupiers and public realm by reducing exposure to and mitigating the effects of poor air quality.

Policy P30 (affordable workspace) requires the retention of small and independent businesses, or small shops and if it is not retained or re-provided, a relocation strategy must be provided as set out within Policy P32 (business relocation). This seeks to protect existing small or independent businesses and small shops.

New proposals are urgently needed on the Camberwell Green Road junction and should be included as part of the Camberwell Area Vision.

The Camberwell Area Vision should also be revised to remove references to 'large shops', or at least a caveat that the development of large shops would not be undertaken without the proper infrastructure and air quality improvement measurements in place.

While we welcome the P28's objective to promote small businesses in Camberwell, we note that Southwark has previously struggled to deliver on commitments to independent small traders. For example at the Elephant and Castle shopping centre redevelopment there was originally no provision for affordable retail units. A few of the independent traders have now been offered alternative affordable space by the council in the basement car park at Perronet House. This is an undesirable retail location due to the lack of natural light and its position on the other side of the ring road from the main shopping centre, so there will be no footfall. Camberwell has many independent businesses, including those located in railway arches close to the site of the proposed Camberwell Station. They need protection from sudden rent increases and should be fully involved in any redevelopment plans (unlike the small businesses in Elephant and Castle) neither of which the Camberwell Area Vision mentions. We do not think the plan has been positively prepared with existing small businesses in mind.

At the very least there should be commitments within the NSP and the Camberwell Area Vision to full consultation with all small businesses before any redevelopment plans emerge. The NSP should not be used as a sweeping policy to push out existing small retailers.

Individual  
NSPPSV327.3

I am concerned about Tall buildings which would destroy the character of the area, place the area in shade and cause distress to existing residents.

The congestion at Denmark Hill needs to be addressed here. A new exit is

Policy P16 (tall buildings) has been amended to include the site allocations that have potential for tall buildings.

The NSP does not provide detailed guidance regarding appropriate

essential.

The plan should offer up the ability for the council to fine owners who do not maintain shop fronts or buildings above.

Camberwell Church Street needs a policy where shop owners by the bus stop cannot place goods on the pavements.

existing parking should be maintained for local residents. the lack of parking will deter families and older infirm. this will create an unbalanced society. the families , infirm and elderly are being discriminated against as they cannot walk cycle or use public transport easily.

Cycling should be supported but existing routes and parking should be maintained for local residents. the lack of parking will deter families and older infirm. this will create an unbalanced society. the families , infirm and elderly are being discriminated against as they cannot walk cycle or use public transport easily.

The council needs to ensure that Rubbish is collected promptly from Camberwell Church Street. This is a disgusting street full of large, unemptied bins and black bin bags pecked by crows and rubbish sprawling over pavements. there needs to be a policy to stop this. This Waste can have negative impacts on health and wellbeing, amenity and the environment and makes locals have no pride in their main street

Ensure businesses take rubbish out at the appropriate time and not allow bins to remain unemptied.

building heights as this should be determined through a detailed design assessment of genuine development proposals in relation to their context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).

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The congestion at Denmark Hill will need to be addressed by TfL, Network Rail or the station operator. Denmark Hill Railway Station is not included as a site allocation.

The plan cannot control how shopfronts or buildings are maintained, if there is an issue in this regard, the council may take enforcement action depending on the severity of the issue. Policy P8 (shop fronts) sets out a criteria for development affecting shopfronts. This seeks to retain historic shopfronts and encourage the provision of well designed new shopfronts.

If shop owners are placing goods on the pavement where they do not have the relevant license, or this is not permitted as part of a planning permission, this will be addressed by enforcement action depending on the severity of the issue.

Any new developments will be required to provide disabled car parking as per the parking standards in the plan. Where the loss of car parking is proposed in any development, consideration of need of the spaces will be given.

Any development will be required to comply with Policy P61 (Reducing waste) which includes providing adequate recycling, composting and waste disposal, collection and storage facilities on-site or provide a suitable off-site waste management strategy that does not adversely impact amenity access or the environment where on-site waste management provision is not possible.