

GREATER LONDON AUTHORITY

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Department: Planning

Our reference: LDF10/LDD16/CG01
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By email: localplan@enfield.gov.uk
Neeru.kareer@enfield.gov.uk

Dear Ms Kareer

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local
Development) (England) Regulations 2012**

Re: Consultation on Enfield Towards a New Local Plan 2036 – Issues and Options

Thank you for consulting the Mayor of London on Enfield's Towards a New Local Plan 2036 – Issues and Options. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to provide comments on the emerging Local Plan on his behalf. Transport for London (TfL) have provided comments, which I endorse, and are highlighted in this letter with detailed comments attached at Annex 1.

This letter sets out where you may need to amend proposed policies and supporting text to be more in line with the emerging Draft New London Plan.

The draft new London Plan

The Mayor published his draft new London Plan for consultation on 1st December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan commenced on 15 January 2019 with publication anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Enfield Development Plan and contain the most up-to-date policies.

Given the anticipated timetable for the submission of Enfield's draft revised Local Plan, it is likely the Local Plan will be required to be in general conformity with the new London Plan. The draft new London Plan and its evidence base are material considerations in planning decisions.

Overall Strategy and objectives and the Green Belt

Whilst the Mayor supports the majority of the draft Local Plan's objectives he does not support the release of the Green Belt as set out in Draft New London Plan Policy G2. The National Planning Policy Framework (NPPF) does not require a review of the Green Belt. The fundamental

aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The retention of the Green Belt is also to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Enfield has two Opportunity Areas, being the Lee Valley and New Southgate. The draft Local Plan identifies numerous potential redevelopment sites in Enfield Town (Figure 7.2).

Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. The Mayor, in his draft new London Plan has set out a strategy for London to meet its housing need within its boundaries without encroaching on the Green Belt or the loss of industrial capacity and therefore there are no exceptional circumstances to warrant a Green Belt review.

Paragraph 2.12.2 of the Draft Local Plan describes Crews Hill station as a sustainable location for growth. The settlement is highly constrained by Green Belt and is served by a train station with three trains an hour at peak time, giving the area public transport accessibility levels ranging between 0 and 1b. In addition, the nearest substantial town centre, Enfield Town, is not within reasonable walking distance and there are no bus services serving the area. On all three counts the Mayor, including Transport for London, does not consider Crews Hill to be a sustainable location for growth as stated in Enfield's Draft Local Plan. Echoing Transport for London's response (Annex 1), it is considered that with such a low level of public transport connectivity, either current or planned, the development of this area would be likely to be car dependent.

Enfield has traditionally identified large sites and broad areas to deliver the bulk of its planned growth over plan periods, through a series of area action plans and masterplans. Maintaining this approach will go some way in helping to meet the needs set out in the Draft Local Plan. This approach should also be supported through the proactive identification of individual sites where growth capacity can be more accurately determined, and delivery can take place more speedily. The 'call for sites' being conducted by Enfield is welcomed and should result in the identification of specific deliverable sites to form the basis of site allocations and should be considered as the first step towards the formulation of a proactive approach which makes the best use of land in accordance with Draft New London Plan Good Growth Policy GG2.

It is noted that this consultation of Enfield's Draft Local Plan is not accompanied by any evidence base, a point that was similarly raised in our response to Enfield's first stage of consultation on the Draft Local Plan three years ago. The more recent Inspector's report for Edmonton Leaside Area Action Plan Examination in Public made it clear that Enfield needed to conduct borough-wide evidence-based work to support their strategic approach to planning in the area.

The Mayor's response that follows, includes suggestions and other representations to clarify and improve upon some policy areas and to ensure the document is more aligned with the draft new London Plan.

On 12 February 2016, the Mayor provided comments (reference: LDF10/LDD16/MJ01) on A New Local Plan for Enfield – Regulation 18 consultation, making suggestions as to how the Local Plan should progress in light of the current London Plan. This letter follows on from that earlier advice and now also relates to the Draft New London Plan.

Housing target

The draft new London Plan sets out how London's housing need can be met within its boundaries. The draft new London Plan sets Enfield a 10-year net housing completions target of 18,760 units (1,876 per annum). Of this target, 9,830 completions should be identified from small sites. Whilst

Enfield's Local Plan needs to consider the National Planning Policy Framework 2018, the National Practice Guidance is clear that

Where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit their local housing need figure when preparing new strategic or non-strategic policies (Paragraph: 018 Reference ID: 2a-018-20180913).

Enfield's housing target is based on the borough's capacity as set out in the London Strategic Housing Land Availability Assessment 2017, which Enfield fed into; and a methodology for small sites. Enfield is encouraged to prepare design codes to guide small housing developments in line with draft London Plan policy H2 to promote the delivery of small sites in the borough.

Small sites

Enfield should take a proactive approach to delivering small sites, in line with draft London Plan policy H2. In draft Local Plan policy H3, it is unclear what Enfield means by 'underused sites'. The approach should apply to all appropriate sites as outlined by draft London Plan policy H2 and take into account the presumption in favour of small housing developments.

In order to plan effectively for small housing development and in the setting out of design codes, Enfield should recognise that local character evolves over time and will need to change in the most appropriate and sustainable locations in accordance with Draft New London Plan Policy H2B.

Affordable housing

Draft Local Plan policy H2 should note that the threshold for not submitting viability assessments is 50% on publicly owned land and sites where industrial capacity is lost. The Mayor would not support an approach that sets a lower threshold for the requirement of viability assessments. The threshold approach does not prevent developments proposing less than 35% affordable housing to come forward but requires them to be accompanied by a viability assessment.

In the next version of the document, Enfield should set out what the remaining 40% tenure split will be in order to provide certainty to developers as this forms part of the threshold approach. In order to follow the Fast Track Route, 35% of homes must meet these requirements and for any additional affordable housing provided above that level a more flexible tenure mix can be applied in accordance with Draft New London Plan (minor suggested changes) Policy H7B. Enfield should set out its required affordable housing tenure mix based on its local housing evidence and viability which indicates a greater need for social and affordable rented housing products.

The Mayor would support a policy that seeks affordable housing contributions from residential schemes of less than 10 dwellings and encourages boroughs to do so. The boroughs of Camden and Richmond have both fairly recently successfully introduced tariff-based approaches. Enfield's small housing sites target is sufficient enough to yield significant contributions from smaller housing developments.

Built to rent

The Mayor welcomes Enfield's support for Built to Rent schemes. With regards to the proposed approach to affordable housing, please see the Mayor's Further Suggested Change to the draft new London Plan (M29.1) put forward as part of M29 – Build to Rent.

Older People's Housing

The Mayor welcomes Enfield's recognition of its annual benchmark for specialist older persons housing of 195 homes a year as set out in Table 4.4 of the Draft New London Plan and Local Plan Policy H7 should set out Enfield's commitment to meeting this target. Furthermore, Enfield are advised to take note of proposed further suggested changes to the Draft New London Plan, under Matter 31, concerning the provision of specialist older persons housing and these alterations should be taken into account in future versions of the Local Plan and especially in regard to policy H7C where reference to C3 housing should be removed.

Gypsies and Traveller accommodation

The Mayor welcomes Enfield's intention to undertake a Gypsy and Travellers Accommodation Needs Assessment and the definition of Gypsy and Traveller as set out in Policy H16 of the Draft New London Plan should be used to inform the study.

Design

The Mayor welcomes Enfield's draft policy D2 regarding tall buildings and small scale infill and extension developments. It would be helpful if this positive approach was more closely reflected by the supporting text. In particular, as stated above, the supporting text could acknowledge in line with draft London Plan policy H2, that local character evolves over time. The supporting text should also separate the issues of tall buildings and higher densities. Higher density development does not mean tall buildings. Enfield should note that well designed higher density schemes will bring a range of social and built environment benefits to an area.

In addition, in line with draft London Plan policy D8, the policy should be clearer as to where tall buildings will be acceptable in principle. Paragraph 4.3.1 sets out three broad locations where there are existing tall buildings.

The Mayor welcomes the proposed policies that seek to future-proof development from the impacts of climate change and that give consideration to de-construction.

Economy

The Mayor welcomes Enfield's acknowledgement of the demand for additional industrial capacity in the borough and its ambition to intensify existing industrial areas. The draft new London Plan identifies Enfield as a borough that needs to provide additional industrial capacity. London Industrial Land Demand (GLA 2017) indicates that Enfield requires in the region of 41.7ha of industrial land up to 2041. Any approach to the intensification and release of industrial land should take into account the London Plan and Local Plan evidence regarding the type of demand for industrial capacity and follow the guidance set out in the Mayor's Practice Note on Industrial intensification and co-location through plan-led and masterplan approaches (https://www.london.gov.uk/sites/default/files/practice_note_-_industrial_intensification.pdf). In addition, Enfield should apply the principle of no net loss of industrial floorspace capacity within SIL and LSIS in accordance with Draft New London Plan Policy E4.

Before implementing draft Local Plan policy E2 Enfield should set out a borough-wide approach to the protection, intensification and release / co-location of Enfield's industrial capacity. Enfield should provide evidence to support policies and site allocations, indicating the most suitable places for increased industrial capacity as well as where additional industrial floorspace is most likely to be provided (including potential floorspace) based on redevelopment potential and willingness of land owners. The approach should note that SILs are London's main reservoir of land for industry

and logistics and are critical to the long term effective functioning of London's economy. Enfield needs to demonstrate that its approach to industrial intensification is justified and effective.

The release of industrial land is not the only way to regenerate adjacent areas. High quality developments within areas and supporting infrastructure can also improve existing neighbourhoods, providing opportunities for growth and regeneration.

Whilst a limited amount of ancillary office space may be required to support industrial uses, any new B1a floorspace in industrial locations should be strictly limited, including for example to upper floors/mezzanines and managed so that B1a floorspace does not encroach on and compromise the integrity or effectiveness of existing industrial activity. Offices should be directed to Enfield's town centres (as set out in draft Local Plan policy E3). If applied to industrial sites, it is considered the approach set out in policy E2(e) is too broad and should be restricted to B1(c) uses, where local evidence demonstrates sufficient demand.

The London Office Policy Review 2017 (GLA) indicates that Enfield currently has a small office market (paragraph 6.2.45) which is unlikely to change unless Enfield creates the conditions for this to happen as part of a wider strategic and economic approach. Strategic plans for office development should take into account Table A1.1 of the Draft New London Plan which identifies only two town centres in Enfield that fall within the office guidelines. Both Enfield Town and Southgate are identified as centres that show demand for existing office functions, generally within smaller units.

Affordable workspace

To ensure the next iteration of this approach is in conformity with the London Plan, the policy should just refer to the mechanisms for securing affordable workspace. The reference to B1 floorspace in Policy E4 is too broad. B1a floorspace is not permitted in SIL, and in line with Draft New London Plan Policy E1 should be directed to town centres. To support this approach, the London Plan has two distinct policies to support new businesses: draft policy E2 on low-cost business space, and draft policy E3 Affordable workspace which should be managed by a workspace provider. Enfield should differentiate between the two, recognising that low-cost business space is primarily about office type uses while affordable workspace is geared towards specific social, cultural or economic development purposes.

Live/work space needs to be carefully managed to ensure the employment floorspace is retained.

Creative Enterprise Zone (CEZ) – Meridian works

The Mayor is very supportive of the creative industries across London and encourages Enfield to explore the opportunities for these to industrialise within the borough. However, Enfield should provide evidence to support the proposed floorspace for creative uses at Meridian Water. The evidence prepared for the London Plan and for the Edmonton Leaside Area Action Plan, which was supported by the Planning Inspector show a demand for logistics to service London. This location at Meridian Water is well serviced by the strategic road network and therefore remains an appropriate location for logistics. As stated above Enfield need to develop a borough wide approach to industrial land based on local evidence.

It should also be noted that the Mayor's CEZ's as defined in the Glossary to the London Plan have already been awarded.

Town centres

Enfield's strategic approach to its town centres should be underpinned by evidence that establishes the borough's consumer needs over the plan period, identifies opportunities for good growth and ensures resilience during a period of economic and technological challenges. In the absence of appropriate and sufficient evidence and suitable site allocations for retail development it is difficult to determine if the proposed approach is able to deliver adequate and appropriate commercial capacity to meet the borough's needs over the plan period.

Enfield's approach to town centre uses as set out in draft policy TC1 should more clearly support a town centre first approach, reflecting the text in paragraph 7.1.7. The current approach could be counter-productive as it appears to allow town centre uses in many areas that would dilute the concentration of town centre functions. In particular, the location of emerging growth and investment areas is too broad. In accordance with Draft New London Plan Policy SD7, Enfield should identify those centres which have the scope to accommodate commercial development and housing growth taking into account the growth indicators set out in Table A1.1 of the Draft New London Plan.

The Mayor welcomes the flexible approach to land uses, where required to support the vitality and functioning of town centres reflecting the approach in Draft New London Plan Policy SD6, supporting the adaptation and diversification of town centres in response to the challenges and opportunities presented by multi-channel shopping, changes in technology and consumer behaviour. Enfield should ensure that active frontages are enhanced and maintained within town centre boundaries in line with Draft New London Plan Policy D1.

Proposed policy TC1 part (c) is not in conformity with the London Plan. It allows for the introduction of town centre uses in SIL and could lead to the incremental erosion of SIL. The supporting text refers only to industrial businesses selling their produce on their premises. The Mayor would have no objection if the overarching policy limited the approach to cover ancillary sales. The town centres elsewhere in Enfield will provide sufficient capacity to accommodate town centre uses.

Transport

The Mayor welcomes support for the planned rail infrastructure projects that are listed. It should be noted that the East-West Rapid Transit strategic and major road enhancement projects within Enfield, are not included as specific projects in the draft London Plan or Mayor's Transport Strategy and would require further assessment as there is no current commitment or funding secured.

The Mayor also welcomes measures to reduce the impact of private vehicles outlined in draft Local Plan policy T2 including reference to application of the Healthy Streets Approach (part a) and the adoption of maximum car parking standards as well as car lite housing wherever feasible (part e). As part of the policy there should be an explicit requirement to comply with maximum car parking standards set out in policy T6 of the draft London Plan. The positive approach to car lite housing should be expanded to encourage car free development in line with the draft London Plan.

The Mayor welcomes the emphasis in draft Local Plan policy T3 and elsewhere in making active travel the natural choice, consistent with the Mayor's approach in the draft London Plan and the Mayor's Transport Strategy.

Social and Green infrastructure

The Mayor welcomes Enfield's support for the protection, provision and enhancement of social and green infrastructure and the improved health and well-being of residents across the borough, including addressing poor air quality.

The Mayor welcomes Enfield's approach in the protection of trees. However, while the protection of trees is important, the policy should also promote opportunities for new trees and woodlands in order to increase the extent of London's urban forest in line with Draft New London Plan Policy G7 and in achieving the Mayor's ambition to increase tree canopy cover in London by more than 10% by 2050. Furthermore, the draft plan should reflect the requirement that development proposals that would result in the loss of existing trees should be informed by CAVAT, i-Tree Eco or similar valuation system in their replacement in accordance with Draft New London Plan Policy G7.

Enfield's Draft Policy G14 should do more to reflect Draft New London Plan Policy G6, for example making it clear that development proposals should aim to secure net biodiversity gain and should be informed by the best available ecological information taking into consideration that Enfield's most up-to-date Biodiversity Action Plan was published in 2011.

Next Steps

I hope these comments can inform the next version of Enfield's Local Plan. As currently drafted the Mayor has strong concerns regarding the de-designation of the Green Belt and the approach to industrial land and considers that if these are not amended could raise issues of conformity with the London Plan. The Mayor will issue his formal opinion on general conformity when requested at the proposed publication stage. If you would like to discuss any of my representations in more detail, please contact Celeste Giusti (020 7983 4811) who will be happy to discuss and arrange a meeting. We especially encourage you to talk to us on finding ways to accommodate housing and employment growth without encroaching on the Green Belt.

Yours sincerely



Juliemma McLoughlin

Chief Planner

Cc: Joanne McCartney, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL



Annex 1 – Transport for London Comments

Please note that these comments represent the views of TfL officers and are made on a “without prejudice” basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development (TfL Property) to reflect TfL’s interests as a landowner and potential developer in Enfield.

Thank you for giving Transport for London (TfL) the opportunity to comment on the draft Enfield Local Plan – Towards a New Local Plan 2036. We welcome the aspiration of the draft local plan to support growth and enabling people to get around by walking, cycling, and public transport. In particular, we welcome the approach set out in the draft local plan to further reduce car use and implement the Healthy Streets approach borough wide.

The draft London Plan was published in December 2017 and was open for public consultation until March 2018. Following the consultation, a revised draft was published in August 2018 showing Minor Suggested Changes made in response to consultation comments. The draft London Plan is a material consideration in assessing local policy and determining planning applications.

We have set out a number of comments and proposed changes which we hope are helpful. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning, and make the case for continued investment in transport capacity and connectivity to enable Good Growth in Enfield and beyond.

Our comments and proposed changes to the draft Enfield Local Plan are:

Section 2.12.2

The draft local plan states Crews Hill has strong sustainability arguments in favour of developing some green belt land. The area around Crews Hill station has a Public Transport Accessibility Level ranging from only 1a to 1b (on a scale of 1a – 6b, with 6b being the highest), with the wider area recording PTAL 0. Crews Hill station is currently served by Great Northern services between Hertford North and Moorgate, with a maximum of three trains per hour in the peak. There are no bus services serving this area. With such a low level of public transport connectivity either current or planned, the development of this area would be likely to be car dependent. For London to grow sustainably an integrated approach to land use and transport would be necessary to achieve a 75% mode share for walking cycling and public transport in outer London (to achieve a city-wide target of 80%). The focus for large scale mixed use development should be on growth corridors, town centres and ‘opportunity’ areas, where there is planned investment in the public transport network. TfL recommends the Council look at stations with higher public accessibility levels, for example those near retail parks.

Section 7

The Enfield Town scheme has been de-scoped from the Mini-Hollands programme. Enfield will submit a Liveable Neighbourhoods bid for this location and if successful will be granted funding. If

they are not successful, this will have a negative impact on the goal of building a vibrant town centre at this location.

Section 10

Page 177 – The Local Plan should mention the Strategic Bus Review of all routes into Central London as this may have an impact on ridership.

Policy T1

TfL welcomes support for the planned rail infrastructure projects that are listed. It should be noted that the East-West Rapid Transit strategic and major road enhancement projects within Enfield, are not included as specific projects in the draft London Plan or Mayor's Transport Strategy and would require further assessment as there is no current commitment or funding secured.

Suggested change to requirements for development proposals (additional text in bold):

The need for development proposals to contribute to bus network infrastructure is welcomed however the policy could be strengthened with the addition of contributions to **service** improvements as well as access (**including step free access**), **capacity** and interchange improvements to local rail and underground stations.

Policy T2

TfL welcomes measures to reduce the impact of private vehicles outlined in this policy including reference to application of the Healthy Streets Approach (part a) and the adoption of maximum car parking standards as well as car lite housing wherever feasible (part e). As part of the policy there should be an explicit requirement to comply with maximum car parking standards set out in policy T6 of the draft London Plan. The positive approach to car lite housing should be expanded to encourage car free development in line with the draft London Plan. In relation to road safety (part c) reference could usefully be made to the Mayor's Vision Zero initiative.

Suggested changes to requirements for development proposals:

They should provide active electric vehicle charging points at a minimum of 20% (one fifth) of car parking spaces and the remaining 80% of spaces should provide passive provision to comply with London Plan policy T6. Construction Logistics Plans and Delivery and Servicing Plans should be submitted alongside planning applications to detail how the impact of road based freight can be mitigated and maximum use made of the alternatives. Development proposals may also be required to provide funding towards the investigation and/or implementation of Controlled Parking Zones to address concerns about on street parking.

Policy T3

TfL welcomes the emphasis in this policy and elsewhere in making active travel the natural choice, consistent with the Mayor's approach in the draft London Plan and the Mayor's Transport Strategy. Reference should be made to the requirement to meet London Plan policy T5 cycle parking standards as a minimum and for the need to have regard to design guidance including the London Cycling

Design Standards (LCDS) or any successor document. The Healthy Streets approach referred to in Local Plan policy T2 will also have a role to play here. In relation to part c care should be taken to ensure that any routes to be used by both cyclists and walkers are fit for purpose and designed to appropriate standards as set out in LCDS.

Policy T4

TfL welcomes the intention to make more school trips safe, sustainable and healthy. This could usefully cross reference Local Plan policy T2 in relation to Healthy Streets and road safety (Vision Zero).

Crossrail 2

Over-arching comment: Four-tracking and Crossrail 2

TfL welcomes the support for Crossrail 2 serving Enfield and agrees with the summary that the project could transform transport accessibility, housing and growth opportunities in the borough.

Four-Tracking is sometimes described as a stage of Crossrail 2 (eg. blue box page 182), and at other times is described as if it is a separate initiative altogether (eg. 10.2.9.).

TfL recommends that consideration is given to providing a specific reference which clarifies what both Four-Tracking and Crossrail 2 represent, as below for example, and that this is reflected in the references in the document.

Crossrail 2 is a new railway running across London in the South West - North East corridor. In the Northeast, it is planned to serve all of the West Anglia Main Line stations in the Borough: Meridian Water, Ponders End, Brimsdown and Enfield Lock with up to 12 trains per hour in each direction. Accommodating these extra trains relies on Four-Tracking the West Anglia Mainline (between Tottenham Hale to the south of the Borough, and Broxbourne to the North), as well as a Crossrail 2 tunnel underneath inner and Central London, connecting with the Southwest Main Line at Wimbledon. This level of service increase could not be accommodated by Four-Tracking alone, as there is not sufficient capacity for additional trains at, or on the approaches to Liverpool Street or Stratford, the existing terminus points of the service.

Opportunities exist to Four-Track the West Anglia Main Line in advance of the opening of a Crossrail 2 tunnel in the mid 2030s. Without Crossrail 2, these would deliver a lesser train service increase, but could still support growth in the corridor. One opportunity is an emerging proposal to four-track part of the line between Tottenham Hale and Meridian Water and this was the subject of a bid for the Government's Housing Infrastructure Funding in late 2018. Further opportunities exist to deliver more extensive four-tracking all the way to Broxbourne prior to the opening of Crossrail 2, however there is currently no committed funding for this.

While Four-Tracking to Broxbourne as an early stage of Crossrail 2 was endorsed by the West Anglia Taskforce, there is no formal commitment to this at present by the Crossrail 2 project team. This is

because in early 2018, the Mayor of London and the Secretary of State for Transport jointly commissioned an Independent Affordability Review that has been scrutinising the funding, finance, cost and risk of the scheme. This includes investigating ways in which the scheme could be delivered in phases. Further work is ongoing, and the Government have said that they will *'consider the case for the project at the Spending Review'*¹. The Mayor remains committed to delivering Crossrail 2, and it is at the heart of both his Transport Strategy and London Plan.

Section 2: Promoting Good Growth Options in Enfield

We support the identification of the Upper Lee Valley and New Southgate Opportunity Areas in the Enfield 2036 Growth Options diagram (Figure 2.2, page 34) (though it should be noted that the draft New London Plan 2017 refers to the Lee Valley Opportunity Area rather than the Upper Lee Valley Opportunity Area).

In the draft Growth Objectives (section 2.6), TfL supports the promotion of sustainable patterns of development including areas around stations (Objective 1, page 37), and the aim of providing a planning strategy for growth aligned with planned new and improved major transport infrastructure (Objective 4, page 37).

Paragraph 2.13.5 (page 52) states that *'the current [Crossrail 2] business case being made to the government outlines Enfield would need to provide a further 40,000+ new homes out of the 200,000 homes to be realised through land released by Crossrail 2'*.

This statement, and the subsequent reference to *'a 40,000 housing requirement to make Crossrail 2 a reality for Enfield'*, is inaccurate. This should be reworded to reflect that the Crossrail 2 Business Case indicates that the scheme could unlock around 20 to 30,000 extra homes in Enfield, and that the delivery of this many new homes is not a requirement for the scheme to happen – it is the scale of new housing that the scheme could unlock.

Paragraph 2.13.6 states that *'The Mayor's draft new London Plan due to be examined in early 2019 is planning for a time period up to 2041 but as it is drafted the Plan does not make strategic policy provision for Crossrail 2 to happen.'* This meaning of this wording is not clear and should be revised.

Para. 2.13.2 indicates that there is road infrastructure investment associated with Crossrail 2. This is not the case, though level crossings are proposed to be closed and alternative access routes will be provided as required. Furthermore the plan should make it clear that road tunnelling at New Southgate remaining unfunded.

Section 5: Meeting Enfield's Housing Needs

Crossrail 2 supports the Council's ambitions to provide the substantial quantum of new homes which Enfield needs over the plan period. We welcome recognition in Draft Policy Approach H1 that new infrastructure investment such as Crossrail 2 could create opportunities to deliver increased growth in a sustainable way.

Section 10: Sustainable Movement and Transport

On Figure 10.4 (page 180), Crossrail2 should be rewritten as Crossrail 2, and an opening date of mid 2030's should be referred to.

We welcome the support for Crossrail 2 set out in Draft Policy Approach T1 (page 183), including the expectation that development proposals safeguard and consider access to existing and future infrastructure projects. Part (a) of the Draft Policy Approach indicates that 'associated infrastructure to improve east-west connectivity' is within the scope of Crossrail 2; this is not the case, though level crossings are proposed to be closed and alternative access routes will be provided as required.