



Enfield RoadWatch

**Fighting for Enfield's countryside and for affordable homes in the right places**

**Response to the government's consultation on the New Towns  
Draft Programme: 'Chase Park' and Crews Hill, Enfield**

**Submitted on 18th May 2026**

**Submitted by Carol Fisk (Vice Chair, Enfield RoadWatch)**

**By email to: [NewTownsConsultation@communities.gov.uk](mailto:NewTownsConsultation@communities.gov.uk)**

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## About Enfield RoadWatch

Enfield RoadWatch is a local action group made up of residents around the borough who have been lobbying for the protection of the borough’s green spaces for over 12 years. We are non-party political and inclusive. With our partner organisations, we have provided evidence that building on our countryside will not solve London’s housing crisis and that there are better and more realistic solutions. We can show that the new town proposal is not based on evidence and will not produce the benefits that are promised.

Our response focuses on the proposed new town location at **Crews Hill and Chase Park, Enfield**, and we comment in the following section on the consultation itself and also on the new towns process.

## Procedural Issues

**Flaws with the consultation and consultation process:** Enfield RoadWatch recognises that London – and Enfield – have a housing crisis and supports the delivery of genuinely affordable, safe and sustainable homes. However, the case for building up to 21,000 homes on approximately 884 hectares of Green Belt land at Crews Hill and over Enfield’s countryside [Chase Park] has not been evidenced or tested. For a development that would change the west side of the borough permanently, the public should be provided with all the evidence behind the choice of location and how the new town will be delivered so that they can engage fully and comment in an informed and accurate way.

Furthermore, asking for public comment at a time when the Local Plan process is still incomplete and the Green Belt allocations in the draft local plan have not yet been found sound or unsound, as well as timing the consultation during an election period and with public holidays during the consultation window, shows lack of serious intent in the process and a disrespect for the opinions and local knowledge of the people most affected by the proposal.

The House of Lords Built Environment Committee recommended that there should be early and meaningful engagement, infrastructure-first masterplanning, people-centred placemaking, green and blue infrastructure from the outset, inclusive design and long-term stewardship. The process seems to be falling at the first hurdle.

In summary, our concerns about the consultation are:

1. The consultation is not sufficiently informative
2. The timing makes effective participation harder
3. The consultation has not been properly targeted
4. The language suggests the decision may already be advanced
5. Question 10 asks about additional environmental information, but there is no way to submit additional evidence – of which there is much. There should also be a clear mechanism for respondents to submit additional evidence, not just comments. That is a serious flaw. A consultation process that asks the public to identify missing environmental information but does not clearly invite or facilitate the submission of that evidence is not well designed.

Given the many flaws in the consultation, we would expect the government to re-run this present consultation in the autumn with the plans and evidence base available to the public for comment. Only with this material available can a meaningful consultation on the principles take place

**The new towns process:** In addition to concerns about the consultation, we have serious issues with the whole New Towns process. Other organisations are elaborating on these so, in summary:

1. **There is no overarching strategy for the programme.** Sites appear to have been selected for a variety of random reasons. In the case of Crews Hill & Chase Park those reasons seem to be: a) there is a station and b) the council submitted a vague, poorly evidenced and misleading proposal.
2. **Failure to follow Treasury Green Book requirements**
3. **Requirement for substantial Government investment.** In the case of Crews Hill & Chase Park, which is semi-rural and rural, enormous infrastructure investment would be needed before a single house could/should be provided.
4. **The case for high-density, urban regeneration.** Brownfield first remains a government, London and local priority. There is brownfield land in Enfield alone for 30,000 homes, including the much-delayed Meridian Water site, which should have provided up to 10,000 homes by now and which would have made an excellent new town location.
5. **Opposition to greenfield new towns.** Throughout Enfield's local plan process [8 years now and counting] there has been consistent, widespread and vocal opposition to greenfield development. This opposition is not NIMBY but a result of well-informed

residents who have presented evidence-based data demonstrating there are better alternatives. As mentioned above, Enfield's brownfield can accommodate at least 30,000 homes, there are currently 4,600 empty homes in the borough and London-wide, there are some 300,000 planning permissions that have not yet been built. In addition, most experts agree, supply is not even the main cause of the housing crisis.

6. **Over-reliance on developer assurances.** A developer-led housing market can never solve the affordable housing crisis. Viability all too frequently kicks in. There is no guarantee that they will deliver genuinely affordable housing and or that infrastructure will be delivered up front. In the case of Crews Hill & Chase Park, this would embed car use at an early stage.
7. **House of Lords Built Environment Committee recommendations** The process is failing to pay heed to these very necessary recommendations.

## Appendix A – Response to Consultation Questions

**Q1, Which of the following best describes how you are responding to this consultation?**

As both individual and on behalf of a local interest organisation

**Q2. Which area are you responding about?**

Potential new town location – Crews Hill and Chase Park, Enfield

**Q3. What is your connection to the proposed location/region?**

Environmental organisation – Enfield RoadWatch

**Q4. If you are responding on behalf of an organisation, please select the type of organisation you are responding from below:**

Environmental organisation – Enfield RoadWatch

### **Section 3.1 – Assessment of Locations**

**Q7. Thinking about the thirteen locations listed, which locations do you believe have positive features that could help achieve the objectives of the New Towns programme?**

**Selection:**

Only brownfield sites with multiple public transport options and within walking/cycling distance of jobs and services are suitable. This is not the case with the Enfield site, as has been well-evidence during the ongoing local plan examination.

While some residential development at Crews Hill could be envisaged, it would need to happen without destroying the many businesses and jobs already there and be designed and phased in a way to be sustainable. Development on the wider Green Belt has no positive features.

**Q8. Do you think any of the thirteen locations listed face barriers which could hold back delivery of the New Towns Programme objectives?**

**Answer:** Yes

**Selection:** Crews Hill & Chase Park, Enfield

Yes. Crews Hill and Chase Park face serious barriers which could hold back delivery of the New Towns Programme objectives.

**The land is not available.** The land identified as “available” by the government was promoted by a Labour council that lost control in the recent local elections. The incoming majority political group (the Conservatives) pledged in their local election manifestos to oppose the sale or release of Green Belt land for development. 77% of Enfield voters voted for parties that pledged their opposition to the new town. As most of the target area is council-owned, it can no longer be considered “available” in the sense of there being a willing landowner. In addition to the council-owned farmland, many key tracts of land within the Crews Hill settlement are owned by multiple established businesses who are in total opposition to the new town.

**Infrastructure and affordability barriers.** All the sites, but particularly Crews Hill & Chase Park, will face infrastructure and affordability barriers unless they are paid for with state funding. It is likely that infrastructure will not be delivered in a timely manner, if at all. Given the precedents, it is unlikely that the housing will be affordable and is highly unlikely to reach the stated 40% level. For a new town to succeed, there would need to be state intervention

to put in place infrastructure and community services before houses are built, to provide incentives to employers, and to build social housing.

**A new town concept in the wrong place.** There are several issues specific to Crews Hill because it is a greenfield site. From a vague green circle in the New Towns Taskforce report to a much bigger circle encompassing all of western Enfield, it's hard to see any coherence in the plan to somehow tie together Crews Hill and Vicarage Farm/ Chase Park into an expanded 21,000 home new town. The two very different sites are several km apart with the landscape restoration project between them and precious little existing infrastructure. The site's nomination seems more a case of stretching the council's local plan ambitions to reach a size suitable to qualify as a new town but with no overall strategy behind it. In addition, Crews Hill itself is in multiple land ownership [an estimated 80 different sites of varying sizes] and land assemblage would be protracted and not necessarily successful.

**The transportation issue:** The lack of infrastructure, topography and rural nature of the target area would require major early investment in public transport and active travel to avoid high car ownership, congestion, overspill parking, pressure for road widening and long-term car dependency. The Trent Park development in Trent Country Park illustrates what can happen when a project is designed as car-lite without the necessary public transport already in place. House sales were depressed because of the lack of parking and now cars are very much part of the lifestyle in the development.

**Brownfield first.** It is inexplicable that about one third of Enfield's Green Belt is being proposed for the new town when there is abundant brownfield available in the borough. Brownfield First is a policy much preached but apparently not to be pursued. No wonder there is such a lack of trust in government. Lip service does not win votes, as the local elections have proved. Enfield's Local Plan identifies more than 700 brownfield sites with capacity for around 30,000 homes, and community groups have identified further brownfield capacity. Developing greenfield as proposed would undermine all the aspects of Brownfield First and drain resources from much-needed urban regeneration projects.

**Place breaking not placemaking** The area targeted for the new town is not empty land looking for a purpose. It is already a place. Crews Hill is home to around a hundred businesses — the majority of them independently-owned family enterprises, many of them multi-generational — which together employ many hundreds of people, with continued future employment opportunities. The countryside described by the council as 'low value' is in fact productive farmland with ecological, climate, economic, carbon sequestration, public health and many other benefits. Soil grade 3b does not equate to a surface car park or an abandoned building. It plays a vital role in the environment.

**Q9. Do you have any comments about whether the SEA report has identified the main environmental issues relevant to the thirteen locations?**

**Answer:** Yes

**Selection:** Crews Hill and Chase Park, Enfield

The SEA does not appear to have identified or properly weighted the main environmental issues relevant to Crews Hill and Chase Park.

The main problem is that the SEA is too high-level for a location where detailed local evidence already exists through the Enfield Local Plan process. That evidence covers transport, Green Belt, landscape, biodiversity, employment land, infrastructure and site-specific constraints. The consultation does not explain how that evidence has been reviewed, what conclusions have been drawn from it, or why the SEA reaches the judgements it does. This lack of reference is surprising given that WSP were closely involved in the local plan examination, producing several reports for the council.

This is a serious weakness and it is therefore inadequate to state, as the draft Programme does in the section on the proposed Enfield New Town, that any harms would be outweighed by the need for new housing. This is especially egregious when multiple other solutions to the housing crisis are not mentioned at all. For instance, without a proper comparison with lower-impact brownfield options, the environmental case for releasing large areas of greenfield land at Crews Hill and Chase Park is incomplete.

In short, the SEA does not provide a suitable basis upon which the Government can decide that housing outweighs all concerns and it does not provide a basis for understanding the harm. There is inadequate information for the government to take a properly informed view of the planning balance. And inadequate information for the public to comment in the consultation in an informed way.

Other Enfield groups and Community Planning Alliance are outlining issues with the SEA in a more detailed way and we agree with all their points.

**Q10. Is there any additional environmental information about these locations that the SEA should take into account?**

**Answer:** Yes

**Selection:** Crews Hill and Chase Park, Enfield

Yes. The SEA should take into account the detailed local evidence already available through the Enfield Local Plan process and related evidence base. There is a considerable amount of this.

This should include:

1. The Local Plan evidence on Green Belt harm and the role of the land in preventing sprawl, protecting countryside and supporting urban regeneration.
2. The detailed ecological evidence for Crews Hill and Chase Park, including evidence on Sites of Importance for Nature Conservation, priority habitats, mature trees, veteran trees, hedgerows, species, habitat connectivity and irreplaceable habitat.
3. Evidence on existing public access to open countryside, including public rights of way, the London Loop, Merryhills Way, the Hertfordshire Chain Walk and other established routes, which are well-utilised for walking, running, dog walking, cycling and access to nature.
4. Transport evidence, including TfL's position statements, transport modelling, road delay impacts, rail capacity, bus feasibility, parking assumptions, mode-share assumptions and the challenge of delivering a genuinely car-lite settlement in this location.
5. Evidence on existing employment, including horticultural, retail, leisure, equine, rural and other businesses whose future could be put at risk.
6. Evidence on food-growing and productive land, including horticultural uses and the potential loss of soils and growing capacity.
7. Evidence on water supply, wastewater, drainage, flood risk, sustainable drainage, greenfield runoff and climate resilience.
8. Evidence on noise, including the impact of the M25 and aircraft noise on the liveability of homes, schools, parks and play spaces.
9. A full carbon assessment which separates building carbon from land-use change, including the loss of soil carbon, vegetation carbon and future sequestration.
10. A separate assessment of Crews Hill and Chase Park as distinct locations, including their different constraints, different transport catchments, different landscape settings, different development capacities and different impacts.

**Q11. Do you have any suggestions for practical mitigation measures to address any effects identified in the SEA report?**

**Answer:** Yes

## **Selection:** Crews Hill and Chase Park, Enfield

Yes. However, the starting point should be avoidance, not mitigation. The first question should be whether harm can be avoided by choosing a different location, reducing the scale of development, removing sensitive land from the boundary, or prioritising brownfield delivery instead.

If Crews Hill and Chase Park remain under consideration, the following minimum mitigation measures are needed.

First, the Government should publish all key evidence, assumptions and options appraisal material before any further policy lock-in. The public cannot properly respond without the evidence.

Second, the Government should test Crews Hill and Chase Park separately. If either location is to be developed, the scale and form of development should respond to that location's own capacity, constraints and placemaking logic. The two places should not be forced together simply to meet a programme threshold.

Third, any boundary should be redrawn around the evidence. Sites of Importance for Nature Conservation, irreplaceable habitats, veteran and mature trees, important hedgerows, ecological corridors, public rights of way, historic landscapes and productive land should be treated as constraints that shape the proposal, not as issues to be dealt with after the principle has been accepted.

Fourth, there should be a binding brownfield-first test. Before greenfield land is released, the Government should publish an assessment of brownfield alternatives and the impact that a greenfield new town would have on Enfield's brownfield pipeline.

Fifth, there should be a clear "no infrastructure, no occupation" rule. Homes should not be occupied at scale until the necessary transport, schools, health, water, wastewater, drainage, green infrastructure and community facilities are funded and delivered.

Sixth, transport mitigation must be enforceable. That means step-free rail access, improved rail frequency where feasible, bus priority, safe walking and cycling routes, strict parking restraint, controlled parking to prevent overspill, and mode-share monitoring with consequences if targets are missed.

Seventh, existing businesses and jobs should be protected at all costs. Where change is unavoidable, there should be funded relocation, compensation and transition support.

Eighth, any public land should deliver permanent public benefit, especially Social Rent housing, rather than simply maximising capital receipts.

Finally, consultation and engagement should be independently run, properly resourced and audited, with planning advocates available to support residents and businesses.

**Q12. Do you have any other feedback on the SEA report, including the issues and effects identified therein?**

Detailed analysis of the SEA section relating to Crews Hill and Chase Park, reveals it to be based on the same high-level, misleading statements and assumptions that were presented in the New Towns Taskforce report, and that information must have come from Enfield Council's submission - which the council refused to release to an FOI from the GLA. It seems that the original submission was taken at face value with no independent evidence-gathering to check its validity and accuracy. Refuting the many inaccurate, vague and misleading assumptions and conclusions in the SEA report is beyond the scope of this organisation's resources, but the evidence submitted throughout the local plan process referenced under Q10 does that very effectively. The Government should request, review and test all that evidence before proceeding.

A consultation cannot be properly informative if it asks the public to comment on a broad location for up to 21,000 homes while relying on an SEA that has not clearly used, summarised or responded to the detailed local evidence already available.

As mentioned above, asking for feedback without a mechanism for submitting additional evidence to back up that feedback equates to a flawed consultation. A lot of evidence is missing and there must be a way for that to be submitted and considered before the process continues and there should be a clear audit trail for accountability.

The SEA should also be clear that mitigation is not the same as acceptability. Some harms cannot simply be mitigated later. The loss of productive soils, the loss of mature ecological networks, the loss of open countryside character, the destruction of existing businesses, and the embedding of car dependency are all matters that need to be avoided at the outset.

**Section 3.3 – Proposed New Town Locations**

**Q13. Do you think the 7 locations proposed for the new towns programme are the ones most likely to meet the programme's objectives?**

Answer: No

We do not consider that Crews Hill and Chase Park has been shown to be one of the locations most likely to meet the programme's objectives for a new town.

There is a total lack of evidence to show that:

1. **Scale.** There is capacity for 21,000 homes. The original green circle, covering, according to the NTT report 884 hectares, and which was expanded in the SEA to seemingly cover most of the west of the borough, is not a blank canvas. The new town proposal cobbles together two very different sites some kilometres apart with restored landscape and active farmland in between and somehow expects us to accept without evidence that this will result in a cohesive new town.
2. **Brownfield first.** Unless the programme's objectives are the direct opposite of government policy, it is hard to agree that building on an extensive greenfield site can meet objectives when brownfield first is the universal policy.
3. **Placemaking** is a programme objective that this site totally fails to meet. Place breaking would be more appropriate.
4. **Economic growth.** The site cannot be argued to have met this objective when more businesses are likely to be destroyed and more jobs lost than are created.
5. **Deliverability.** The site faces numerous obstacles to deliverability in large part because of the lack of existing infrastructure and because of the complex land ownership of Crews Hill. There are also restrictive covenants on much of the land and protective policies, such as an Area of Special Character in the Development Plan, are already in place. In addition, the recent change of council control renders the council-owned land – the majority of the target area – now unavailable.
6. **The House of Lords Built Environment Committee** advised that new towns need a clear vision, early infrastructure, meaningful engagement, locally distinctive placemaking, health and inclusion designed in from the start, and long-term stewardship, and that they are likely to fail if housing numbers are the primary driver.

The Government should therefore not treat the location as a preferred new town site unless and until the evidence is published, alternatives are tested, and the case is made openly.

#### **Section 4.1 – Government Offer**

**Q14. Do you agree with the overall government offer for proposed new town locations?**

Answer: In the case of Crews Hill & Chase Park – Not sure

**Q15. Do you think there are any additional interventions that government should consider to ensure design and placemaking quality in new towns?**

Answer: In the case of Crews Hill & Chase Park – Not sure

## **Section 4.2 – New Towns Planning Policy**

**Q16. How clear do you find the proposed planning policy?**

Answer: Neutral

**17. Do you think establishing placemaking principles in the proposed planning policy is an effective way to implement the placemaking ambition of the programme?**

Answer: Not sure

**Q18. Do you think the proposed planning policy provides sufficient flexibility to new town locations to meet the placemaking principles?**

Answer: Yes/ No

Flexibility is inappropriate when applied to several key principles. For Crews Hill & Chase Park, the following should not be treated as optional or flexible:

- whether Crews Hill and Chase Park are genuinely one coherent new town or separate growth areas;
- protection of SINCs, irreplaceable habitats, mature trees and ecological corridors;
- protection and enhancement of public rights of way and meaningful countryside access;
- clear limits on greenfield land allocated for development;
- binding public transport and active travel requirements;
- strict parking restraint and enforcement;
- no large-scale occupation before infrastructure is in place;
- protection or relocation support for existing businesses;
- clear Social Rent requirements, especially on public land;
- water, wastewater, flood risk and drainage capacity;
- long-term stewardship and maintenance funding;
- transparent governance and community involvement.

The masterplan should be capable of adapting over time, but the public interest guardrails should be fixed early. That means flexibility in how outcomes are achieved, not flexibility over whether they are achieved.

**Q19. Is establishing a 40% target for affordable housing an effective way of delivering an ambitious number of affordable homes?**

Answer: No

No. It is meaningless. It will be undeliverable and renegotiated by developers during the project. It will also not result in social housing, which is what is needed. This comes back to the central issue with this project: lack of substantial public funding.

The consultation should be honest about timing and not lead people to believe that affordable homes are imminent. A new town may take many years before it delivers homes at scale. Evidence should be provided of tenure mix, timelines and so on to avoid the risk of misleading people.

**Q20. Is the proposed policy on giving substantial weight in decision-making to the social and economic benefits of new towns clear?**

Answer: No

No. The social and economic benefits of a new town should not be assumed simply because a proposal is labelled a new town. They should be evidenced. For housing, this means evidence of tenure mix, timing and so on. For economic benefits, it requires an accounting of the current economic situation and how that will be impacted and, if necessary, mitigated. For transport, a lot of evidence needs to be provided up front to prove that the new town will not be car-dependent and cause a variety of environmental problems.

As with so much of the new towns process, assumptions have been allowed to replace evidence and ambitions and rhetoric to replace the hard work of fact-finding and independent research. The potential harms of the new town to the environment and the Green Belt are more well-evidenced than any of the benefits.

**Q21. Do you agree with the Government's approach to decision-making policy on the Green Belt?**

Answer: No

Green Belt should not be treated as a reserve of land to be released whenever large housing numbers are proposed. The starting point should be whether development can be delivered on brownfield land, underused land and existing urban sites, which should be fully exhausted first. In the case of Crews Hill & Chase Park, these tests are not met because the Council's Local Plan identifies more than 700 brownfield sites with capacity for around 30,000 homes. Included in this is Meridian Water which is projected to deliver 10,000 homes and should have been nominated as a New Town in its own right.

Also, the Government seems to have accepted at face value comments from the Enfield Council submission describing the target area as 'poor quality' and 'low quality'. At Crews Hill and Chase Park, much of the land is greenfield, and some areas have mature landscape, ecological, public access, food-growing and historic value.

Green Belt release should be the last resort, not the starting point.

**Q22. Do you think the proposed planning policy is sufficient for the purposes of safeguarding land for development as new towns?**

Answer: No

It is not at all clear how land for new towns is to be safeguarded and how this land interacts with local plans or planning applications. There will be overlap, ambiguity and legal challenges about this new set of towns that sit outside the rest of the planning system.

There should be no safeguarding of any greenfield land until every brownfield opportunity, empty home and unbuilt planning permission has been used.

**Q23. Do you think any additional planning policies are needed to support the delivery of the programme objectives?**

Answer: Yes

Yes. Additional planning policies are needed. We defer to the list provided by Better Homes Enfield.

**Q24. Do you have any views on the potential impacts of the New Towns Draft Programme on people or groups with protected characteristics?**

No

**Q25. Is there anything else you would like to tell us that you think is relevant to this consultation but has not been covered in previous questions?**

Yes.

The public is being asked to comment on a proposal without the evidence needed to judge it.

A new town of up to 21,000 homes across around 884 hectares at Crews Hill and Chase Park would be one of the most significant changes to Enfield for generations. It would greatly impact established communities, affect homes, jobs, transport, public services, Green Belt, nature, landscape, food-growing, water, climate resilience and public access to open countryside.

The decision should therefore be evidence-led from the outset.

At present, too much of the public case rests on assertion. Claims have been made about housing, transport, sustainability, ecology, economic growth, public benefit and the suitability of the site. But the underlying evidence has not been published in a form that allows residents, businesses, campaigners or independent experts to test those claims.

This is especially important because Crews Hill and Chase Park appear to have been cobbled together in order to qualify as a new town. They are separate places. They have been considered separately through Enfield's Local Plan process. Treating them as one location appears to be the result of the New Towns Programme criteria, not a sensible placemaking strategy.

The Government should publish the rationale for combining Crews Hill and Chase Park into a single new town location, including whether either location was assessed separately, whether either would meet the programme threshold on its own, and what evidence demonstrates that the combined area would function as one coherent settlement rather than two separate urban extensions.

We are also concerned that the consultation questionnaire does not appear to provide a clear mechanism for submitting additional supporting evidence, such as reports, maps or technical documents. That is a major weakness. A consultation on a proposal of this scale should not rely only on short-form written answers. Respondents should be able to submit evidence directly, and the Government should publish an evidence log showing what additional material has been received and how it has been considered.

Before Crews Hill and Chase Park is taken forward, as part of this consultation the Government should be fully transparent and publish:

- the full options appraisal;
- the reasons this location was selected;
- the alternatives considered and rejected;
- whether Crews Hill and Chase Park were assessed separately;
- the rationale for combining them;
- whether either location meets the programme threshold on its own;
- the evidence that the combined area can function as one coherent new town;
- the brownfield alternatives assessment;
- the infrastructure and phasing assumptions;
- the transport evidence;
- the Green Belt and grey belt assessment;
- the ecology and landscape evidence;
- the water, wastewater and drainage evidence;
- the assessment of existing businesses and jobs;
- the public land and land value capture strategy;
- the expected housing mix, including Social Rent;
- the delivery timetable;
- the governance proposal;
- a clear route for submitting further technical evidence.

The Government should also publish an assessment of whether the proposed new town would be genuinely additional to brownfield delivery or whether it would substitute for it. That assessment should compare the new town with a brownfield-led strategy and should test which approach delivers more homes, more Social Rent, faster delivery and lower environmental harm.

A sales-led cross-subsidy model should not be assumed to be capable of meeting acute housing need. If the programme depends on market absorption and private sales rates, it will be structurally vulnerable from the start. Public land should be used for publicly led delivery of genuinely affordable homes, not as the basis for another speculative model that promises public benefit and then negotiates it down.

There should be no policy lock-in, land safeguarding, development corporation boundary, land assembly or irreversible decision before that evidence is published and tested.

#NoevidenceNonewtown