

MHCLG New Towns Consultation Team

**By email:** newtownsconsultation@communities.gov.uk

**30th April 2026**

**Formal complaint: New Towns Draft Programme consultation - Crews Hill and Chase Park**

Dear MHCLG New Towns Consultation Team,

We are writing as local civic, community, environmental and transport organisations to make a formal complaint about the conduct of the New Towns Draft Programme consultation, specifically in relation to the proposed Crews Hill and Chase Park new town in Enfield.

While our organisations may have different views on particular aspects of the proposal, we share serious concerns about the conduct of the consultation and whether local residents, businesses and community organisations have been given enough information and time to respond properly.

We do not consider that the consultation, as currently designed and timed, complies with the Government's own Consultation Principles. We are also concerned that the consultation does not meet the wider public law requirements of fair consultation. A fair consultation should take place when proposals are still at a formative stage, provide enough information to allow intelligent consideration and response, allow adequate time for responses, and ensure that responses are conscientiously considered before any final decision is made. In particular, we are concerned that the consultation fails to meet the requirements that consultations should be informative, should take account of the groups being consulted, should be properly targeted, and should not generally be launched during local or national election periods.

The proposal for Crews Hill and Chase Park is of exceptional scale and consequence. The consultation refers to an expanded development of up to 21,000 homes, bringing together Crews Hill and Chase Park in Enfield.<sup>1</sup> This would represent a major and permanent change to this part of the borough. It would affect residents, businesses, workers, landowners, transport users, environmental assets, local services, green space, and the wider pattern of development across Enfield.

**1. The consultation is not sufficiently informative**

Given that scale, the consultation does not provide enough information to allow residents, businesses, community groups or other local stakeholders to give properly informed responses.

The consultation material does not provide a sufficiently clear spatial proposal. There is no detailed boundary plan, no parcel-level map, and no clear explanation of what land is in or out of the proposed new town. Nor is there a clear explanation of how Crews Hill and Chase Park, which are separate areas, would be joined together and planned as a single coherent new town.

This is especially problematic because Annex A to the consultation itself recognises that New Town locations should identify known boundaries and intended scale, and should identify the infrastructure necessary to support a New Town in both the early stages and over the longer term.<sup>2</sup>

The consultation also does not provide key development assumptions. There is no clear information on proposed density, housing mix, employment land assumptions, transport mode share, parking assumptions, infrastructure sequencing, phasing, or delivery model. Without these assumptions, consultees are being asked to comment on a major development programme without knowing what is actually being proposed.

There are also major gaps in the local impact information. The consultation does not provide a quantified assessment of the carbon impact of large-scale greenfield and Green Belt development. It does not provide a proper assessment of the loss of existing businesses, jobs and employment activity at Crews Hill. It does not explain how any displaced businesses would be protected, supported or relocated. It does not assess the potential impact of the proposed new town on brownfield housing delivery elsewhere in Enfield.

Transport is another serious gap. Transport for London raised significant concerns during the Enfield Local Plan process in relation to a much smaller scale of growth, stating that the Crews Hill and Chase Park proposals in the draft Local Plan were “*not considered to be the right approach as their transport impacts cannot be mitigated.*”<sup>3</sup> The consultation does not explain how those concerns would be overcome for a proposal of up to 21,000 homes. Without that explanation, residents cannot properly assess whether the proposal is deliverable or whether it would worsen congestion, car dependency and pressure on existing transport networks.

This is also relevant to Annex C, which says deliverability includes whether locations can provide adequate infrastructure and are not overly reliant on car travel.<sup>4</sup> The consultation does not provide enough information to show how the Crews Hill and Chase Park location satisfies those tests.

The Strategic Environmental Assessment (SEA) is also not sufficient to cure these problems.<sup>5</sup> It operates at a broad programme level. Annex B expressly recognises that there is “a substantial amount of further evidence” available through adopted or emerging development plans and associated assessments for many of the broad locations.<sup>6</sup> However, it states that because the level and type of information varies by broad location, that more detailed evidence was not taken into account in order to ensure consistency.

This is a serious problem for Crews Hill and Chase Park. The location has already been subject to detailed local assessment through the Enfield Local Plan process, including evidence on transport, Green Belt, landscape, biodiversity, employment land, infrastructure and site-specific constraints.<sup>7</sup> The Government and its consultants should therefore already be aware of many of the key issues and evidence gaps.

This concern is heightened because WSP, which prepared the New Towns Programme SEA for MHCLG, also authored several important parts of the Enfield Local Plan evidence base, including transport, air quality and infrastructure evidence. The issue is therefore not simply that detailed local

evidence existed somewhere in the background. Relevant parts of it were prepared by the same consultancy now advising MHCLG on the SEA.<sup>8</sup>

The consultation does not explain how that Local Plan evidence has been reviewed, what conclusions have been drawn from it, or why the SEA reaches the judgements it does where more detailed local evidence may point to greater constraints or unresolved impacts. Consultees should not be expected to identify these gaps from scratch when relevant evidence already exists through the Local Plan process.

In these circumstances, the consultation does not appear to meet Principle C of the Government's Consultation Principles, which says that consultations should be informative and should give enough information to ensure that those consulted understand the issues and can give informed responses. 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 taken into account, presented or summarised the key local evidence already available from the Local Plan process.

## **2. The timing makes effective participation harder**

We are also concerned about the timing of the consultation. The consultation runs from 23 March to 19 May 2026.<sup>9</sup> This period includes the Easter holiday period and the local election campaign, with local elections taking place on 7 May and the consultation closing only 12 days later.<sup>10</sup>

This timing makes effective local participation much harder. Residents, community groups, local representatives and campaigners are being asked to respond to a major national consultation, including a lengthy SEA report, at a time when many people are affected by school holidays and when local political attention is understandably focused on the election. For a proposal with such significant local implications, this is not a neutral timing issue. It directly affects the ability of people and organisations to engage properly.

Principle G of the Government's Consultation Principles says that consultations should take account of the groups being consulted, including where a consultation spans all or part of a holiday period. Principle K says that consultation exercises should not generally be launched during local or national election periods, and should be timed so affected groups can participate properly. Even if the consultation was launched shortly before the formal election period, it clearly runs through the election campaign and closes shortly after polling day. That is not appropriate for a proposal of this scale and sensitivity.

This is not merely a theoretical concern. Local groups are having to review a large national consultation, a lengthy SEA report and associated annexes, while also dealing with the Easter holiday period, bank holidays and the local election campaign. That task is made harder because the SEA does not present or cross-reference the relevant local evidence from the Enfield Local Plan process in a clear and accessible way. Instead, local residents and community groups are effectively being asked to identify, locate and interpret that evidence themselves. This has reduced the time and capacity available for local organisations to brief residents, review the evidence, coordinate responses and submit informed representations.

### **3. The consultation has not been properly targeted**

We are also concerned that the consultation has not been properly targeted. A GOV.UK consultation and online questionnaire are not enough for a proposal affecting a specific local area with many directly affected residents, businesses and community organisations. There should be a clear local engagement plan for Crews Hill and Chase Park, including direct engagement with residents, local businesses, workers, environmental groups, community organisations and other affected stakeholders.

Nor is it clear what specific steps MHCLG has taken to ensure that residents, businesses and community organisations in and around Crews Hill and Chase Park are aware of the consultation and able to respond to it.

We are not aware of any local in-person consultation sessions, drop-in events, public meetings, webinars or exhibitions where residents and businesses can ask questions, view maps and visual material, understand the implications of the proposal and discuss how to respond. For a proposal of this scale, a GOV.UK webpage and online questionnaire are not a sufficient substitute for active local engagement.

We are also concerned that the consultation process does not clearly explain how residents, businesses and community organisations can submit supporting evidence. The consultation asks respondents to comment on complex matters including environmental effects, deliverability, infrastructure and local impacts, but the online questionnaire does not appear to provide a clear route for uploading or submitting evidence alongside responses. That makes it harder for local groups and affected businesses to provide the detailed material needed to inform the Government's decision.

This is especially important because Annex A itself says New Towns should establish clear and effective ways to engage the local community in shaping the vision and goals for each new town.

### **4. The language suggests the decision may already be advanced**

Finally, the consultation risks giving the impression that the outcome is already at an advanced stage. Crews Hill and Chase Park is described as one of the Government's priority interventions.<sup>11</sup> That makes it especially important that the consultation is procedurally robust, transparent and genuinely capable of influencing the final decision.

## Action requested

For these reasons, we ask MHCLG to:

1. extend the consultation period;
2. publish a supplementary evidence pack for Crews Hill and Chase Park;
3. provide a clear boundary plan and explanation of the land being considered;
4. publish the key development assumptions, including density, housing mix, employment land, transport, parking, infrastructure and phasing assumptions;
5. publish a proper assessment of transport impacts, including how concerns previously raised by TfL would be addressed;
6. publish an assessment of employment impacts, including likely job losses, business displacement and proposed mitigation;
7. publish a carbon and greenfield land impact assessment;
8. explain how the proposal relates to the Enfield Local Plan evidence base, including any differences between the SEA and the more detailed local assessments already undertaken;
9. publish a schedule of the Enfield Local Plan evidence documents reviewed by MHCLG and its consultants, explaining how that evidence has informed the SEA and the proposed selection of Crews Hill and Chase Park;
10. set out clearly how residents, businesses and community organisations can submit supporting evidence as part of the consultation process;
11. set out how local residents, businesses and community organisations will be directly engaged;  
and
12. confirm whether advice was sought from the Cabinet Office Propriety and Ethics team in relation to the consultation running through the local election period.

Until this further information is provided, we do not consider that residents, businesses or community organisations can give properly informed responses on the Crews Hill and Chase Park proposal.

We would be grateful if this complaint could be considered separately from our substantive consultation responses, and if you could confirm what action MHCLG intends to take to address these procedural concerns before any final decision is made.

Yours faithfully,

Vicki Pite, on behalf of Action for Enfield's Future

Matt Burn, on behalf of Better Homes Enfield

Ian D'Souza, on behalf of Enfield RoadWatch

Francis Sealey, on behalf of Enfield Climate Action Forum

John West, on behalf of The Enfield Society

Lakis Pavlou, on behalf of, Hadley Wood Neighbourhood Planning Forum

**Cc:**

Feryal Clark MP

Kate Osamor MP

Bambos Charalambous MP

Joanne McCartney AM

Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and the Fire Service

## References

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<sup>1</sup> MHCLG, *New Towns Draft Programme*, section 3.2, reference to Crews Hill and Chase Park delivering up to 21,000 homes, published 23 March 2026.

<https://www.gov.uk/government/consultations/new-towns-draft-programme/new-towns-draft-programme>

<sup>2</sup> MHCLG, *Annex A: Draft New Towns Planning Policy*, published 23 March 2026. Annex A states that development plans should identify New Town locations and their intended scale, including known boundaries to give clarity on the extent of land for development specifically as a New Town. It also says plans should identify the infrastructure necessary to support a New Town in the early stages and over the longer term.

<https://www.gov.uk/government/consultations/new-towns-draft-programme/annex-a-draft-new-towns-planning-policy>

<sup>3</sup> Transport for London, *Written Statement on Matter 5: Spatial Strategy, Place-Making and Design*, Enfield Local Plan Examination, 30 September 2024. TfL stated that the Crews Hill and Chase Park proposals in the draft Local Plan were “not considered to be the right approach as their transport impacts cannot be mitigated.” It also said very large-scale development is not generally appropriate in less well-connected locations because future occupiers are more likely to rely on private vehicles.

[https://www.enfield.gov.uk/\\_\\_data/assets/pdf\\_file/0022/88015/H61-TFL-Planning.pdf](https://www.enfield.gov.uk/__data/assets/pdf_file/0022/88015/H61-TFL-Planning.pdf)

<sup>4</sup> MHCLG, *Annex C: Locations Methodology - New Towns Draft Programme*, published 23 March 2026. Annex C states that deliverability includes whether locations can deliver the planned number of homes without unreasonable spatial or other constraints, enable adequate infrastructure provision, and are not overly reliant on car travel.

<https://www.gov.uk/government/consultations/new-towns-draft-programme/annex-c-locations-methodology-new-towns-draft-programme>

<sup>5</sup> MHCLG/WSP, *New Towns Programme Strategic Environmental Assessment Environmental Report*, March 2026.

<https://www.gov.uk/government/consultations/new-towns-draft-programme>

<sup>6</sup> MHCLG/WSP, *New Towns Programme: Strategic Environmental Assessment Environmental Report (Annex B)*, March 2026. The SEA states that, for consistency, the primary source of information for each broad location was the New Towns Taskforce Report. It recognises that there is “a substantial amount of further evidence” available through adopted or emerging development plans and associated assessments for many broad locations, but says this was not taken into account because the level and type of information varies by broad location.

[https://assets.publishing.service.gov.uk/media/69c108717e02b81c0d1c75f1/Annex\\_B\\_-\\_New\\_Towns\\_Programme\\_\\_\\_Strategic\\_Environmental\\_Assessment.pdf](https://assets.publishing.service.gov.uk/media/69c108717e02b81c0d1c75f1/Annex_B_-_New_Towns_Programme___Strategic_Environmental_Assessment.pdf)

<sup>7</sup> Enfield Council, Enfield Local Plan Examination, Document Library. Published March 2024.

[https://www.enfield.gov.uk/\\_\\_data/assets/pdf\\_file/0015/104361/Document-library-V19-Planning.pdf](https://www.enfield.gov.uk/__data/assets/pdf_file/0015/104361/Document-library-V19-Planning.pdf)

<sup>8</sup> Enfield Council, Enfield Local Plan Examination Document Library, including WSP-authored documents TRA1, TRA3-TRA11, ENV1-ENV6 and IDP2.

[https://www.enfield.gov.uk/\\_\\_data/assets/pdf\\_file/0015/104361/Document-library-V19-Planning.pdf](https://www.enfield.gov.uk/__data/assets/pdf_file/0015/104361/Document-library-V19-Planning.pdf)

<sup>9</sup> MHCLG, *New Towns Draft Programme*, published 23 March 2026.

<https://www.gov.uk/government/consultations/new-towns-draft-programme/new-towns-draft-programme>

<sup>10</sup> Electoral Commission, *Key dates for voters 2026*.

<https://www.electoralcommission.org.uk/voting-and-elections/key-dates-voters-2026>

<sup>11</sup> MHCLG, *New Towns Draft Programme*, section 3.3, published 23 March 2026.

<https://www.gov.uk/government/consultations/new-towns-draft-programme/new-towns-draft-programme>