

No Evidence. No New Town.

Why evidence, not opinions, must shape decisions about the proposed Crews Hill and Chase Park new town

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INTRODUCTION

In September 2025, the government's New Towns Taskforce identified **Crews Hill and Chase Park in Enfield** as a possible location for a new town of **up to 21,000 homes**.

This report, "**No Evidence. No New Town**," is not based on the claim that nothing should ever be built at Crews Hill and Chase Park. Nor does it deny that Enfield faces a serious housing crisis. Its argument is that **a proposal of this scale should only move forward if the case for it is clear, honest and evidence-based. So far, the failure to publish the necessary evidence has created space for misleading messaging to go largely unchallenged.**

Too much of the public case for the new town rests on assertion rather than proof. Big claims have been made about housing, jobs, transport, sustainability, ecology, public benefit and the suitability of the site, but close inspection of these claims shows they are often contradictory, unproven, biased, overly optimistic, or simply wrong.

This report sets out why that matters. It argues that Crews Hill and Chase Park are being presented as a single coherent new town when **they are actually separate places** with different characters, different constraints and no convincing centre of gravity to bind them together. It shows that **the proposal sits uneasily with repeated political claims of support for a brownfield-first approach**, and risks **diverting attention and capacity away from more immediate and more realistic ways of meeting housing need.**

It also argues that, **where public land is involved, the ambition should be far higher.** Public land should deliver clear public benefit, **above all genuinely affordable housing and Social Rent at scale.** At the same time, the area must not continue to be treated as empty or disposable. **Crews Hill and Chase Park already support jobs, businesses, food-growing, access to open countryside and important ecological assets.** These are part of the baseline reality that any honest proposal must start from.

The report also examines the wider constraints that have so far been downplayed or left unresolved: the **loss of livelihoods**, the **ecological value** of the land, the **climate and carbon consequences** of large-scale greenfield development, the **absence of a credible transport strategy**, serious **noise concerns**, the **misrepresentation of the existing public access to open space**, and **risks relating to food and water security.**

Finally, **this is also a report about public trust.** A proposal of this scale cannot credibly proceed through unsubstantiated claims, withheld evidence and consultation after the fact. **If the case for a new town is strong, the evidence should be published, tested openly and debated honestly. If it is not, that should be admitted too.**

That is the test applied throughout this report. Not whether a new town *sounds* ambitious or whether it works as a political slogan. But whether the evidence is strong enough to justify a profound and permanent change to this part of Enfield.



Image: View of greenfield land identified for development. (Source: Authors, 2026)

1. ONE PLACE OR TWO?

'Crews Hill and Chase Park are separate and distinct areas. Cobbling them together into a single unified 'new town' or 'urban extension' will generate major placemaking problems.

Crews Hill and Chase Park are **roughly 4 to 5 km apart** as the crow flies. The government says a new town which joins these two areas could deliver up to **21,000 homes** across c.**884 hectares of land**. That is a huge area - the equivalent of around **1,200 full-sized football pitches**. The **other new town sites proposed for London are a fraction of the size**.

If the intention is for Crews Hill and Chase Park to function as a single sustainable new town or urban extension, then the proposals should demonstrate how that will happen. That requires more than general references to "links" or "green infrastructure." As a minimum, **the new town will need a clear centre of gravity that people use every day. It will need a new town centre, built around a station and central transport hub.**

Achieving this across such a wide area would require re-locating Crews Hill station to be more centrally located between Chase Park and Crews Hill and forming a town centre around it, but that is not what is proposed. **Without this change, the two areas will continue to sit in different catchments**, with Chase Park likely to read as Oakwood, and Crews Hill continuing as a separate district, meaning **the combined "new town" proposal is not credible**.

This sets the project up to fail. Planners will not be able to do what's needed to create a single new town centre, and without that no amount of master planning and placemaking tinkering, will ever be able to genuinely resolve the obvious incoherence at the heart of the project – **it's not a new town, and never will be** - it's two separate urban extensions.

The new town label may be useful for branding and political posturing, but it will be incoherent in practice. A huge amount of time and money will be wasted trying to reconcile the unreconcilable. Let's not do that. Developments at Crews Hill and Chase Park, if they happen at all, should be treated as what they are: separate and distinct projects.



Image: One of the existing public rights of way, ignored and under threat. (Source: Authors, 2026)

2. BROWNFIELD-FIRST OR LAST?

Politicians repeatedly claim to support a brownfield-first approach to development, so why are they backing large-scale building on greenfield land at Crews Hill and Chase Park instead of prioritising brownfield sites?

A “brownfield-first” approach means building homes on land that has already been developed, such as old industrial sites and disused car parks. Greenfield land, such as parks and countryside, should only be used where genuinely necessary, and as sparingly as possible.

A brownfield-first approach has widespread public support. Communities often see brownfield land as wasted potential, and there is strong support for its regeneration, with **79% saying it would have a positive impact on their community.**¹

Brownfield-first is a favoured approach for many reasons:

- It makes better use of existing infrastructure.
- It can reduce car dependence.
- It directs investment to urban areas.
- It helps protect nature and biodiversity.
- It helps safeguard access to nature and the countryside.
- It avoids unnecessary loss of greenfield carbon stores.
- It protects land that can grow food and support farming and horticulture.

Politicians often say they support this approach:

“The government is committed to a brownfield-first approach to housebuilding ...”. (Matthew Pennycook, Housing and Planning Minister, 2024).²

“We want to see the absolute minimum amount of Green Belt released. It would be terrific if we could keep it only to grey belt. It would even be better if we could only keep to brownfield”. (Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and the Fire Service).³

“Brownfield-first means absolutely maximising the amount of housing you’re delivering on brownfield land ... we will always look to brownfield first.” (Tom Copley, Deputy Mayor of London for Housing and Residential Development, 2026)⁴

¹ https://www.britishland.com/media/jczlfxkd/200924_how-to-deliver-more-growth-homes-and-jobs-with-the-support-of-communities.pdf

² <https://www.gov.uk/government/news/thousands-of-new-homes-to-be-built-as-government-unlocks-brownfield-sites>

³ <https://gla.moderngov.co.uk/documents/s120721/Minutes%20-%20Appendix%201%20-%20Transcript%20-%204%20December%202025.pdf>

⁴ <https://webcasts.london.gov.uk/Assembly/Event/Index/9fb0c9be-31fa-434d-96fd-a32cf85763cf>

Likewise, local MPs also claim to support brownfield-first and oppose building on “good quality” Green Belt.⁵ **But that political commitment does not stand up to scrutiny.**

First, **Enfield has enough brownfield land to deliver the homes it needs.**

The Council’s Local Plan identifies **more than 700 brownfield sites** with **capacity for around 30,000 homes**. Community groups have identified capacity for around **10,000 more**.⁶

Delivering 30,000 homes would add nearly 25% to Enfield’s existing housing stock. It could also provide around 5,000 new Social Rent homes. Building on such large amounts of greenfield land in Enfield is hard to justify when so much brownfield capacity remains untapped across the borough.

Second, **releasing greenfield land undermines a brownfield-first approach in two ways.**

ONE: By diverting investment and delivery capacity. Around 90% of the land identified for the new town is greenfield. Releasing land on this scale for development would draw limited public and private investment, grant funding, skills and delivery capacity away from urban regeneration and brownfield schemes elsewhere in the borough.

The current London Plan says that London’s Green Belt should be protected to “... *drive the re-use and intensification of London’s previously developed brownfield land to ensure London makes efficient use of its land and infrastructure, and that inner urban areas benefit from regeneration and investment.*”⁷

This point was emphasised by the GLA during the development of Enfield’s Local Plan regarding the release of greenfield land at Crews Hill and Chase Park:

- *“The retention of the Green Belt is also to assist in urban regeneration by encouraging the recycling of derelict and other urban land.”*⁸
- *“In particular, there appears to be sufficient capacity to meet the required housing target for this local plan without Green Belt sites. Moreover, bringing forward Green Belt sites at this stage, alongside non-Green Belt brownfield sites, risks undermining brownfield delivery and viability, particularly in the first 10-year period.”*⁹

⁵ <https://enfielddispatch.co.uk/labour-secure-election-sweep-in-enfield-while-council-leader-becomes-barking-mp>

⁶ <https://www.enfield.gov.uk/services/planning/new-enfield-local-plan>

⁷ https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf (para 8.2.1)

⁸ https://www.london.gov.uk/sites/default/files/PAWS/media_id_451875/enfield_local_plan_reg_18.pdf

⁹ <https://gla.my.salesforce.com/sfc/p/#4J000000tmdo/a/Q5000000VGje/DbM0d4UG4Rctyh0EBCZW18zSB1PHWSA2EwccUDfRtZI>

The impact of releasing around 800 hectares of greenfield land for potential development on Enfield's brownfield delivery pipeline has not been properly considered by the government, the GLA or Enfield Council. This is a major oversight, and it suggests that brownfield-first is being used more as a slogan than as a real policy test.

The New Towns Taskforce report says locations should help to “accelerate housing delivery”, but it did not properly consider how releasing greenfield land on this scale would affect brownfield delivery. Instead, that crucial question has simply been pushed down the road.

TWO: By slowing delivery through market limits. Releasing a very large volume of new housing land into a single housing market area would exceed realistic demand and absorption rates, slowing build-out overall, especially on brownfield sites.

There is substantial evidence that housing delivery is constrained by market absorption, workforce capacity, demand and build-out rates. **It is not realistic to assume that Enfield can deliver housing at scale across its brownfield pipeline while delivering a huge new town.**

Finally, the New Towns Taskforce did not prioritise brownfield new town sites over greenfield ones when making its recommendations. Other London sites submitted to the Taskforce would regenerate brownfield land but were not shortlisted. **Targeting greenfield land at Crews Hill and Chase Park, instead of prioritising these other locations directly contradicts the government's commitment to a “brownfield-first” approach.**

A new town of the scale proposed at Crews Hill and Chase Park is in direct tension with brownfield-first policy. Politicians should explain that contradiction honestly and in detail, or they will risk losing credibility and undermine public trust.



Image: Stalled brownfield site in Enfield with capacity for 10,000 homes. (Source: Authors, 2026)

3. DISTRACTION.

The new town risks distracting decision-makers and resources from the measures urgently needed to address Enfield's acute housing pressures.

Politicians often point to Enfield's housing crisis to justify support for a new town at Crews Hill and Chase Park, particularly the more than 3,000 Enfield households currently living in temporary accommodation.

Broadly speaking, households in temporary accommodation need one of two things: either a Social Rent home, or a private rented home they can afford. At present, neither option is available at the scale required.

There are not enough Social Rent homes in Enfield, following years of under-investment, demolitions and Right to Buy sales. That leaves the private rented sector as the main alternative. But for many households in temporary accommodation, **private rents are unaffordable, and the government has ruled out the reforms needed to change that.** As a result, thousands of households remain stuck in accommodation that is insecure and unsuitable.

Politicians suggest a new town at Crews Hill and Chase Park is the answer. But is it?

The problem with relying on a new town to come to the rescue is that **it will be many years before housebuilding at scale could begin.** The Council, or whoever is in charge, would first need to settle the planning route, prepare and consult on a masterplan, secure key consents, assemble land, and line up funding and delivery for essential infrastructure such as transport, water, sewage, power, schools and health facilities. Realistically, **it is likely to be 5 to 10 years before building at scale could get under way.**

Even then, **there is a limit to how many homes can be built each year.** The Taskforce report refers to an optimistic build-out rate of 600 homes a year. If that were achieved, and that is a big if, it might produce roughly 150 Social Rent homes annually on average.

On that basis, **delivering 3,500 Social Rent homes would take around 30 to 35 years, and it could easily take much longer.** A note submitted by Enfield Council to a Parliamentary committee refers to **a timeframe of 50 to 100 years.**

So, while a new town might contribute to long-term housing supply, it is unlikely to do much for households already living in temporary accommodation in the foreseeable future.

That means **other solutions are needed now**, including:

- Reviewing Local Housing Allowance, the benefit cap, and other barriers that prevent low-income households from being able to afford rents.
- Expanding rent deposit, guarantee and move-on schemes to help households secure settled accommodation.
- Improving standards and enforcement in the private rented and temporary accommodation sectors, including action against rogue landlords and rent controls.
- Increasing the supply of Social Rent homes quickly e.g. through acquisition and bringing long-term empty homes back into use.
- Reforming Permitted Development Rights and unlocking stalled sites with planning permission, so more developments contribute to affordable housing supply.
- Removing perverse incentives that encourage landlords to switch homes from ordinary private renting into temporary accommodation use.

The role a new town could realistically play, and when, must be clearly and honestly evidenced, and should not be allowed to displace more immediate solutions.

We are concerned that new town rhetoric is being used by politicians as an excuse and as a distraction technique, to shift focus away from implementing other interventions needed now. Enfield urgently needs effective short-term actions on housing. What Enfield doesn't need is an approach that will take decades to deliver, dressed up as a solution to the problems people face today.



Image: View of Enfield Council owned temporary accommodation where children have to play in the car park

4. PUBLIC LAND, PUBLIC HOMES.

Social housing delivery should be at the heart of the new town vision. This means public land value should be captured as permanent affordability, not extracted as a one-off receipt.

The availability of publicly owned land at Crews Hill and Chase Park could present **a once-in-a-generation opportunity to deliver Social Rent housing at scale.**

The government's new towns programme expects a minimum of 20% Social Rent – **but that is simply not ambitious enough for publicly owned land.** In our opinion, housing on publicly owned land at Chase Park and Crews Hill should be **100% genuinely affordable, with at least 50% Social Rent**, as this is the most direct way to meet London's housing needs, including helping households living in temporary accommodation and first-time buyers.

This approach has multiple benefits:

- Helps enable stable communities to become established more quickly.
- Homes can be delivered faster as it prevents delivery rates being controlled by sales values, land banking, and speculative cross-subsidy financing models.
- Can free up housing elsewhere e.g. private rented sector homes used as temporary accommodation, can return to being used as standard rental properties.
- Creates a predictable income stream to underpin viability.
- Gives more control over occupancy, thus lowering risk of underoccupancy, and homes being left vacant or used as second homes/holiday lets.
- Land-take is minimised e.g. less greenfield land is used to maximum benefit.

Community-led housing models should also be encouraged. This should include **securing long-term community stewardship of land and shared assets**; and using strong delivery standards to lock in high-quality design and lasting affordability.

Major schemes on publicly owned land present an opportunity to rebuild the supply of social rent and affordable housing in a way that matches long-term need. The opportunity should not be squandered.



Image: View of housing built as social rent (Source: Authors, 2026)

5. LIVELIHOODS DESTROYED.

Enfield has one of the worst employment records in London, yet the government and the Leader of Enfield Council are backing a proposal that could destroy hundreds of jobs at Crews Hill and Chase Park.

Crews Hill and Chase Park are not empty canvases. Crews Hill includes a long-established horticultural cluster (known as the “golden mile”), multiple equine and rural enterprises, and other well-established businesses in retail, engineering, wholesale, and distribution. **Plans for a successful new town should value and protect these assets for both existing and potential future residents, not treat them as easily expendable.**

The protection of hundreds of green sector and automation-resilient jobs, as well as the ancillary jobs supporting these businesses, is particularly important, but has been ignored.

To qualify as one of the New Towns Taskforce’s new towns, locations had to “Support and unlock potential economic growth.” Their report does not explain how needlessly destroying hundreds of people’s livelihoods achieves this aim.

The Council may dismiss Crews Hill’s golden mile as “the wild west of garden centres”, but we see its value and potential as much more. **It should continue to play an important part in the borough’s economy, directly supporting the livelihoods of future residents and contributing to the area’s character and social value.** A serious placemaking strategy should build on those strengths, recognising Crews Hill’s role as a centre for horticulture and the advantage of being close to Capel Manor College.¹⁰

Established businesses at Crews Hill and Chase Park should be part of the area’s future, not brushed aside as expendable. Politicians should recognise the contribution these businesses make to the borough and the fact that real livelihoods depend on them.

Enfield already has high unemployment. Whether or not the new town goes ahead, such a destructive and careless approach to jobs and livelihoods is ethically and economically unacceptable. It should not be allowed to go unchallenged.

¹⁰ <https://www.capel.ac.uk/who-we-are/>

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Image: One of the many horticultural businesses at Crews Hill. (Source: Authors, 2026)

6. NATURE: VALUE DOWNPLAYED, FACTS IGNORED.

Politicians have misled the public by claiming that greenfield land at Crews Hill and Chase Park identified for development is “poor quality” or nature depleted.

The New Towns Taskforce report characterises land at Crews Hill and Chase Park as ‘low value’ saying that *“much of the proposed site is currently low value land, comprising commercial nurseries, garden centres, a golf course and lower quality greenfield land.”*¹¹

Locally, the Leader of Enfield Council, Cllr Erbil has gone further. In a social media post about Crews Hill Golf Course, he claimed: *“There is no wildlife that benefits from this golf course.”*¹²

At a meeting of the London Assembly Planning and Regeneration Committee in June 2025, the Leader of Enfield Council told Assembly Members:

*“I would love to invite you, Chair, and everyone else, including my lovely members on this panel, to Enfield one day, to the seven golf courses we have in Enfield. Instead of playing Where’s Wally, we will play Where’s the wildflower meadow. Chair, I am a beekeeper. I have four generations of beekeeping in my family. As someone who has managed over 120 hives, I can tell you there are no wildflower meadows. There is not much ecology on those golf courses.”*¹³

These are not neutral descriptions. They are value judgements presented as if they are settled facts. They encourage people to dismiss greenfield land as expendable before looking at the evidence. This is also a governance issue. A new town proposal depends on public trust. When senior politicians make categorically incorrect statements, it undermines confidence in the integrity of the process.

Evidence published during Enfield’s Local Plan examination shows the actual ecology value of these sites. The golf course at Crews Hill is **designated a Site of Importance for Nature Conservation (SINC)** and is assessed as having habitat features that are **“irreplaceable.”** The Council’s own consultants documented the **high ecological value of the land** occupied by the golf course. They found the land is **“of metropolitan quality”** in terms of its importance to nature. The report also records **“interest features”** including fish, reptiles, mammals,

¹¹ https://assets.publishing.service.gov.uk/media/68d694b79cb44667f7a1cee7/New_Towns_Taskforce_Final_Report.pdf

¹² <https://enfielddispatch.co.uk/council-leader-slammed-by-golf-club-manager-over-false-claims-on-social-media/>

¹³ <https://www.london.gov.uk/about-us/londonassembly/meetings/documents/s117678/03c.%20Appendix%20-%20Minutes%20-%20Draft%20Transcript%20-%20Planning%20and%20Regeneration%20Committee%2009.06.2025%20vA.pdf>

invertebrates and birds, and notes “**mining bees present in bunkers.**” They also note that the site is **publicly accessible**, providing local people with access to nature.¹⁴

This matters in a national context where nature is already in a very poor state. The UK is widely described as **one of the most nature-depleted countries in the world.** The most recent *State of Nature* report says wildlife populations studied have declined on average since 1970, with around one in six species in Great Britain now threatened with extinction.¹⁵ In England, official biodiversity indicators also track long-term declines in the relative abundance of species.¹⁶ **Against that backdrop, it is reckless to dismiss greenfield sites as “low value” or suggest they have little ecology,** because remaining patches of habitat, mature trees and ecological corridors are precisely what nature recovery depends on. Once they are lost or degraded, they can be extremely slow to restore, and some habitats are recognised as effectively irreplaceable.

Decisions about a proposal of this scale must start with **an honest understanding of the expert baseline evidence, not with glib political characterisations.** Nature recovery should be a primary organising principle for any new town at Crews Hill and Chase Park, with the mitigation hierarchy applied from the outset: avoid harm to designated sites and ecological networks first, then minimise and restore. SINC, ancient and veteran trees and hedgerows, and priority habitats should be treated as non-negotiable constraints that shape the framework, with measurable biodiversity uplift secured and maintained for the long term.

Senior politicians should stop making sweeping claims about wildlife and “poor quality” greenfield land at Crews Hill and Chase Park and should communicate in line with the evidence, including the council’s own ecology work. They should, at the very least, be aware of basic facts, including that land they refer to as having little ecological value is designated as a Site of Importance for Nature Conservation.

¹⁴ https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54669/Crews-Hill-and-Chase-Park-SINC-report-2023-Planning.pdf

¹⁵ https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf

¹⁶ <https://www.gov.uk/government/statistics/indicators-of-species-abundance-in-england/indicators-of-species-abundance-in-england>; <https://www.gov.uk/guidance/irreplaceable-habitats>



Image: Part of an important nature site incorrectly described as having no or little ecological value. (Source: Authors, 2026)

7. OPEN SPACE: REWRITING REALITY.

Politicians have suggested the land is not publicly accessible. That is simply incorrect.

In public messaging, greenfield land has been characterised as “private”, “inaccessible” or effectively empty. That is highly misleading. The area’s public rights of way are a legal right and a real part of daily life for local people. They are used for walking, running, dog walking and getting around without a car.

Saying the land is inaccessible helps politicians justify their support for the new town to a wider audience, many of whom are unlikely to know that large parts of the countryside targeted at Crews Hill and Chase Park **are already publicly accessible.**

What we are seeing is existing access to the countryside and nature being repackaged into something vaguer. The impression given is that access is being created from scratch, when in many cases it already exists and is already used.

Any new town proposal must start from the truth:

- Map every public right of way at the outset and publish it in the main documents.
- Commit to no net loss of routes and no downgrading.
- Protect the experience of the paths, not just the legal line on a map: quietness, views, vegetation, access to nature and the countryside, and separation from traffic.
- Treat existing routes, including the London Loop, as assets to be valued and enhanced, not rebranding opportunities.

Politicians should be honest about the existing public access to nature and the countryside. It is already here, already used, and legally protected. It should be treated as an asset that shapes the plan. Pretending it doesn’t exist is dishonest and undermines public trust.



Image: Publicly accessible countryside targeted for development (Source: Enfield Society)

8. TRANSPORT: A ROAD TO NOWHERE.

Transport will make or break this new town. If it is built before the buses, trains and safe walking and cycling routes are fully in place, people will be forced into cars. Once that happens, “car-lite” becomes just a slogan and the congestion will be permanent.

A car-lite approach is essential, but not easy to deliver in this part of Enfield. In the Crews Hill and Chase Park area, car ownership is already very high. That is because public transport services are limited, and the places people need to get to are not within easy walking or cycling range. Parts are also hilly, which makes active travel harder, especially for older residents, parents with children, and people with mobility needs.

Transport for London (TfL) has repeatedly challenged large scale growth at Crews Hill and Chase Park due to concerns about the new settlements becoming car dependent. They recognise that once a settlement is built around car ownership, behaviours become embedded and then it is almost impossible to change them retrospectively. The pattern is well known - high car ownership leads to high car use, congestion, pressure for road widening, overspill parking, and rat running. Local politics then becomes dominated by arguments about traffic management rather than healthy placemaking.

The long-running disagreement between TfL and Enfield Council about Crews Hill and Chase Park is clear evidence that the transport case is unresolved and shows just how hard it is to turn a car-lite vision into something workable in practice.

And it is not just TfL who are concerned. Neighbouring Broxbourne Council has also raised issues about cross boundary impacts on the transport network. Furthermore, the Council’s own transport modelling, which was published for the Local Plan examination, flags major impacts on the highway network with significant delay increases, even at around 9,000 homes at Crews Hill and Chase Park.

The core point is that you cannot just assume that the presence of a station automatically makes a location “well connected”. A station with limited accessibility, limited frequency and limited capacity will not automatically deliver a low car settlement at this scale in this

location, particularly if car use is an easy alternative. If it did, TfL would not have raised so many concerns.

So, the starting point is not “this site is already well connected”, as the New Towns Taskforce would have it. That is a huge oversimplification and contrary to the expert assessments and evidence. The starting point is that the location is car oriented today and would become more so without very large and early intervention to radically improve public transport.

The “more homes solves transport” claim does not stand up.

There is a recurring argument that if you build enough homes, at a sufficient density, then public transport will follow. But public transport viability depends on where density goes, what is built first, and whether the street network, parking strategies and available amenities support low-car living from the outset.

Simply increasing the headline housing number does not solve the transport problem if the overall density remains low. Without a clear plan for where higher density is located, how the town centre will work (including the provision of amenities within walking distance available from day one), and how public transport is funded and delivered early, higher numbers of homes are more likely to make congestion and car dependency worse, not better.

What needs to be non-negotiable.

If a new town is pursued at Crews Hill or Chase Park, the transport approach needs hard tests, not warm words that ignore problems or kick them down the road for other people to sort out. It needs:

1) Car-free cores and tight parking by design

- Car-free areas around stations, centres, schools and main public spaces.
- Ultra-low parking as the default, not “average” suburban provision.
- Parking kept away from front doors, so the public realm is pedestrian friendly.
- Clear arrangements for disabled parking, servicing, and emergency access that do not inadvertently reintroduce normal car use.

2) Enforcement and management for the long-term.

Car-lite only works if it is maintained, which means:

- Tightly controlled parking, active enforcement, and a funded management body for the full life of the development.
- Monitoring of mode share, car ownership and traffic impacts with consequences if targets are missed.

3) Phasing that prevents car dependence from becoming embedded.

If early phases are built before a proper public and active transport offer exists, car ownership will spike and habits will lock in.

- No large-scale occupations until the public transport improvements are in place.
- Delivery triggers that link later phases to real-world outcomes, not promises.

4) A credible rail offer at Crews Hill.

If rail is central to the case, the scheme must be honest about what is needed and what can feasibly be delivered and when, not what exists today:

- Step-free access as a basic requirement, not a future upgrade.
- Frequency that makes the train feel like a default choice, not an occasional service.
- Capacity protected for the new town, not squeezed by wider network constraints.
- If the town centre is not where the station is, that is a planning failure. The station and the centre need to align.

The New Towns Taskforce talks about bold transport visions and reducing car dependency. But that standard cannot be met by simply asserting that the site is “already well connected” or that improvements can be delivered “in parallel”. **That will not work.**

Either the proposals must show, in detail, how a low-car settlement will work here from the beginning, with funding, phasing and enforceable requirements, or it should not be presented to the public as sustainable or viable.



Image: Roads bordering Crews Hill are already at capacity. (Source: Authors, 2026)

9. NOISE.

If this new town is to be a good place to live, it cannot be planned as if noise is a minor detail. Crews Hill in particular sits next to a major constant noise source.

Noise from aircraft around Crews Hill is reported to breach healthy levels.¹⁷ Furthermore, noise recordings using a smartphone app indicate average levels of around 70 decibels from the M25. These readings are indicative, not a substitute for proper monitoring, but they match what many people experience on the ground: **a very noisy environment that would materially affect both the liveability of homes and the usability of parks and open space.**

World Health Organisation guidance recommends less than 40 dB(A) Lnight outside bedrooms to prevent adverse health effects from night noise.¹⁸ Against that benchmark, indicative noise levels around 70 dB(A) should be treated as a serious design constraint.

The Mayor's London Environment Strategy treats long term noise exposure as a public health issue, linking prolonged exposure to impacts including cardiovascular and physiological effects, mental health effects, and communication and learning effects.¹⁹ The London Plan requires development to avoid significant adverse noise impacts on health and quality of life, so noise should be designed out from the start rather than left to late-stage mitigation.²⁰

Noise should not just be waved away with generic promises about glazing, fences and landscaping. The scheme must publish a robust baseline noise survey early, covering day and night, weekdays and weekends and use that evidence to decide what can go where, including where homes, schools, parks and play areas are located.

If this is not done up front, the risk is predictable: poor health outcomes, poor quality public space, and a development that fails a basic test of liveability.

¹⁷ <https://www.mylondon.news/news/north-london-news/london-new-towns-set-blighted-33440039>

¹⁸ <https://www.who.int/europe/news-room/fact-sheets/item/noise>

¹⁹ https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf

²⁰ <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-online/chapter-3-design>



Image: The M25 bordering Crews Hill. (Source: Authors, 2026)

10. FOOD AND WATER SECURITY.

Contrary to the political narrative, this land is not “empty” or “low value”. It grows food and plants, supports skilled jobs, and once productive soil is built over, it is lost for good.

A new town at Crews Hill and Chase Park would take a large area of land out of existing and potential agricultural and horticultural use. Enfield’s own evidence describes Crews Hill as a centre of horticulture and food-growing. In a period of rising concern about food resilience, supply shocks and climate pressures, this should not be treated as trivial.

Council reports show farmland here is already being treated as flexible and temporary: tenancies have been removed and Farm Business Tenancies have not been renewed. Those decisions show productive land is being repositioned as “available for repurposing.”²¹ That is exactly why “we can fix it later” is not good enough. Rewilding and habitat work can be designed to keep options open. Housing cannot. Once soils are sealed and holdings fragmented, the loss is effectively permanent.

Water is the other reality check. A settlement on this scale would create major new demand for water, while also placing extra pressure on wastewater and drainage systems. In a water-stressed city, it is not credible to assume that the network will simply cope. These are not minor technical details. They are basic constraints that should be tested before political momentum builds around the scheme.

If leaders want to present this proposal as sustainable, they need to prove it up front and lock it in: a water and wastewater capacity plan at outline stage, phased delivery triggers, ultra-low mains demand targets with monitoring, reuse and rainwater capture designed as core infrastructure, and a hard stop on later phases if capacity is not secured.

A proposal that removes productive land and adds major pressure to already stretched water systems should not be waved through on rhetoric. These issues need to be evidenced properly at the start, not pushed into the background and dealt with later.

²¹ <https://governance.enfield.gov.uk/documents/s82642/PL%2020.034%20P%20-%2014%20JULY%2020.pdf>
<https://enfield.moderngov.co.uk/documents/s107346/Enfield%20Chase%20Woodland%20-%2020N%20Gateway%20Report.pdf>



Image: Banbury Reservoir, Edmonton. (Source: Wikimedia commons <https://russ.garrett.co.uk/>, 2022)

11. PLANETARY BOUNDARIES.

There are limits to how much damage the climate, nature and water systems can take. A new town should not be allowed to push Enfield further in the wrong direction.

The “planetary boundaries” framework starts from a simple point: **there are limits to how much pressure human activity can place on the Earth’s life-support systems before the risks rise sharply.**

Two of the most relevant boundaries for this proposal are climate change and biodiversity loss. A third is freshwater, which matters in a city where water resources are already stretched. The point is not that housing cannot be built. It is that **housing delivery can directly conflict with climate and nature goals if it relies on unnecessary land take, locks in car dependence, and treats ecosystems and soils as expendable.**

A new town on greenfield land at Crews Hill and Chase Park risks moving London in the wrong direction on these limits. It could **remove landscapes that help store carbon in soils and vegetation, slow and soak up rainfall, and support ecological networks.** It could also create a settlement where **high car ownership becomes embedded** because everyday distances are long and public transport upgrades arrive late. In that case, the scheme would add to emissions and weaken climate resilience at the same time.

That is why the climate case cannot rest on broad statements about “green infrastructure” alone. The London Plan requires Whole Life-Cycle Carbon Assessments, but these focus on the carbon in buildings and materials, so do not normally capture the full carbon consequences of building a new settlement on greenfield land. **They do not quantify the one-off loss of soil carbon and biomass from land take, or the ongoing loss of carbon sequestration when farmland, grassland, hedgerows and mature trees are replaced by sealed surfaces and managed landscaping.** For a proposal of this scale, those omissions matter. A scheme can look compliant on building carbon while still having a major additional carbon impact through land use change, which could be avoided under a brownfield-first approach.

To make any claim of alignment with climate and nature limits credible, the proposal should be required to show an infrastructure-led approach at an early outline stage and then lock it in through binding obligations for the full build-out period.

This should include:

- A **clear transport plan with enforceable outcomes**, because transport is decisive for both emissions and resilience. Car-lite outcomes must be secured through delivery triggers, parking restraint, mode share targets, monitoring, and consequences if targets are missed.
- A standard Whole Life-Cycle Carbon Assessment for buildings and infrastructure, plus **a separate land use carbon account setting out baseline soil and biomass carbon stocks and sequestration**, and the net change under the proposed masterplan.
- An **outline-stage overheating and canopy strategy, showing how urban heat risk will be minimised through high tree canopy, shade, cool routes, and connected green and blue corridors**, with clear delivery by phase and long-term maintenance secured.
- A **flood and drainage strategy that commits to greenfield runoff rates by phase**, with sustainable drainage designed as functional infrastructure, not decorative landscaping, and with long-term maintenance funding guaranteed.
- **Monitoring and public reporting throughout the build-out**, so later phases cannot proceed if promised outcomes on canopy, drainage performance or transport mode share are not being delivered in practice.

If a new town is promoted as sustainable, those claims must be evidenced and secured early, not just assumed and then pushed aside as something to be dealt with later. Without that, the scheme risks placing additional pressure on climate, nature and water systems when lower-impact options exist through brownfield delivery and more efficient use of land.

12. TRANSPARENCY AND COPRODUCTION.

There have already been many claims about the new town, but the evidence has been withheld and there has been no transparency or genuine public engagement.

A new town is a once in a generation intervention that will reshape land, infrastructure, nature, public services and daily life forever. Change on that scale demands proper consultation with the public, including coproduction.

Coproduction means people can influence decisions while choices are still real. It means early access to the evidence, not consultation on a preferred option after key decisions have already been taken.

There is one simple test. Can the public change the outcome? If the answer is no, it is not engagement. It is communication, or box-ticking, not consultation.

Right now, the basic condition for coproduction is missing. Residents and campaigners have submitted Freedom of Information and Environmental Information requests to understand the basis for the New Towns Taskforce recommendation. We have asked for the evidence, the assumptions and the options appraisal, including what other sites were considered and why they were rejected. Those requests were refused outright. Not partially disclosed. Not released with redactions. Refused.

That is not transparency or working with the community. It is avoiding scrutiny. It suggests decision-makers want support without challenge, and agreement without access to the facts. If the case for a new town at Crews Hill and Chase Park is strong, **why is the public being prevented from seeing the evidence?**

Politicians are making categorical claims about the proposal, yet the public is blocked from testing whether those claims are accurate. The evidence we do have, from Enfield's Local Plan examination, does not back up their claims. People cannot be expected to trust headline numbers and confident statements when the underlying evidence is either withheld, does not support the case being made, or may not even exist in any meaningful form.

This creates a clear governance risk. When evidence is not published early, it becomes easier for politicians to decide what they want first and then use evidence selectively to justify it. That is called “policy led evidence making” and it is exactly how public trust is damaged.²²

If this new town is really about meeting housing need, then coproduction must include the people who experience that need, not just the people who already have a voice. That means designing engagement around those most affected, including concealed households, first-time buyers, long-term renters, potential downsizers, households in temporary accommodation, and the businesses and employees whose future is at stake.

Coproduction means going to people, not waiting for them to turn up. It means publishing clear evidence in digestible form and running a process that welcomes hard questions.

At a minimum, a credible process would require the publication of the evidence in one place, the publication of the options appraisal in full, and a clear public record of questions and answers. If decision-makers cannot publish the evidence, they should stop making definitive claims.

No Evidence. No New Town.

²² <https://publications.parliament.uk/pa/cm200506/cmselect/cmsctech/900/900-i.pdf>

WHAT MUST HAPPEN NOW

If decision-makers want this proposal to be taken seriously, the following minimum conditions must be met first.

1. Publish the evidence

All key evidence, assumptions, constraints and options appraisals relating to the proposed new town should be published immediately and in one place. The public cannot be expected to support major change on the basis of withheld evidence and political assertion.

2. Test brownfield-first properly

Before any major loss of greenfield land is considered, there should be a transparent assessment of brownfield-led alternatives, including delivery potential, viability, displacement impacts, affordability and timescales. If politicians claim to support brownfield-first, they should prove they mean it.

3. Be honest about what housing would actually be delivered

Any public case for the scheme should distinguish between total homes, genuinely affordable homes and Social Rent homes and be honest about likely delivery timescales. A headline housing number is not the same thing as meeting urgent housing need.

4. Public land must deliver public homes

Where public land is involved, it should be used to deliver lasting public benefit, above all Social Rent homes at scale, not treated as a financial asset to be cashed in.

5. Treat nature and open countryside as constraints, not inconveniences

Irreplaceable habitat, ecological networks, mature trees, productive soils, open countryside and public rights of way should shape the plan from the outset. They should not be minimised, downgraded, ignored or explained away later.

6. Recognise the area's existing value

Crews Hill and Chase Park are not blank spaces on a map. They already support jobs, businesses, food-growing, access to nature and a distinctive local character. Any serious assessment should begin from that reality.

7. Protect jobs and livelihoods

Existing horticultural, leisure and other local businesses should not be treated as expendable. Any proposal should properly account for jobs, livelihoods and the wider economic role of the area, including the value of keeping green and automation-resilient work in the borough.

8. Confront the infrastructure case honestly

Transport, noise, water supply, sewage, flood risk, health services, schools and climate resilience should be addressed transparently at the start, not left as vague promises for later stages. If the infrastructure case is weak or unresolved, that should be admitted.

9. Put proper scrutiny and coproduction in place

Residents, local groups and independent experts should be involved early, with genuine opportunities to test assumptions and influence outcomes before positions harden. Consultation after key decisions have already been made is not coproduction.

10. No lock-in before proof

There should be no policy lock-in, land assembly, political momentum or irreversible decisions until the evidence has been published, alternatives tested and the case made honestly in public.