

Better Homes Enfield Response to the New Towns consultation questionnaire

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1. RESPONSES TO QUESTIONS 1-6 ('ABOUT YOU')

Q1. Which best describes how you are responding to this consultation?

- **Answer:** As both an individual and on behalf of an organisation

Q2. Details

- **Name:** Matt Burn on behalf of Better Homes Enfield
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- **Postcode (1st part):** EN1

Q3. Select the specific or wider proposed regions you are responding about

- **Answer:** Crews Hill and Chase Park, Enfield + wider responses to whole approach.

Q4. What is your connection to the proposed location/region?

- **Answer:** Other – local campaign group

Q5. Organisation details

- **Organisation name:** Better Homes Enfield
- **Role:** Spokesperson

Q6. What best describes your organisation, and what size is your organisation?

- **Description:** Voluntary
- **Employees:** N/A

2. INTRODUCTION AND OVERVIEWS

This introductory section forms part of our consultation response. We ask that it be included as we believe it provides important context for our answers to the questions. We also request that it be included as part of our response to Question 25.

2.1 About Better Homes Enfield

Better Homes Enfield is a local housing campaign group, established in 2018 and run by volunteers with backgrounds in planning, as well as housing and health research. We want developments in Enfield to deliver the maximum amount of genuinely affordable, safe, and sustainable housing.

Our response focuses on the proposed new town location at Crews Hill and Chase Park, Enfield.

Better Homes Enfield supports the delivery of genuinely affordable, safe, and sustainable homes and recognises the seriousness of London's housing crisis. However, decisions must be based on accurate and proportionate evidence, proper alternatives testing, clear public information, and meaningful consultation. In our view, those standards have not been met.

2.2 Overview of our position

There is a fundamental issue with the Government's approach. The Government has decided to conduct a programme level assessment ahead of conducting detailed location assessments. That is the wrong way round. The assessment process should have started with detailed location assessments and alternatives testing that feed into the programme level SEA. **The approach taken has created major problems for the assessment and consultation, as well as serious programme risks.**

The adopted approach has resulted in **multiple major evidential gaps** for each location, some of which are identified within the SEA (see Section 4.4. 'Difficulties encountered in undertaking the assessment'). This means the assessment of locations has had to be based on overly broad assumptions and evidence. **This has resulted in assessments that are unreliable.** If the SEA is meant to inform which locations should go forward, if any, it must contain sufficient location-specific evidence before selection to show whether each location is suitable and deliverable, as well as better or worse than reasonable alternatives. This SEA is simply unable to reliably achieve that standard.

What the SEA appears to do, probably out of necessity due to the approach taken, is to identify broad risks and then assume these can be dealt with later. **Issues are side-stepped.** The real assessment of a location will therefore be left until after political and policy momentum has already built up behind preferred locations. **That creates a serious risk of decision lock-in.** Once a location has been named as a preferred new town location, later assessment may become an exercise in making the location work rather than genuinely testing whether it should have been selected in the first place.

The lack of essential evidence for each location means that **even the area under assessment is unclear.** For example, the circular "indicative broad location" shown for Crews Hill and Chase Park on the map covers over 2,000 hectares, which is roughly two to three times larger than the area identified in the consultation material (884 hectares). This raises doubts about the area being assessed. This links to a further issue, which is that **different locations are not treated equally.**

Some of the indicative broad locations are around ten times the size of the area identified in the consultation materials, others around twice the size. **This lack of consistency renders reliable comparison between locations impossible** because the locations have not been assessed on a level playing field.

Assumptions made by the SEA are so broad and numerous that it effectively nullifies differences between the locations assessed. This is evidenced by the **notable lack of variance in the results. The number of identical, and near identical, results for each location across different time periods and multiple metrics is a red flag that the assessment is not working as it should.**

The approach taken, and consequent lack of detailed testing of individual locations, means the SEA has had to rely on claims made in the original submission documents, such as the number of homes that each site would deliver, **without establishing whether the claims are credible.** That means a location could be selected following this assessment, only to find out later that it cannot deliver what was claimed. This would presumably mean the programme level SEA would need to be revisited.

The original submission documents are relied upon within this consultation and the SEA but, despite their obvious importance, have not been published. This means **the public is being asked to respond to a consultation without being allowed to assess key information** and respond to the claims being made about each location. This creates obvious fairness, transparency, and legitimacy issues for the consultation.

Problems with the SEA are serious and numerous. A national programme-level report is appropriate, but it should have been built from robust location-level assessments, not broad assumptions applied across very different places. A proportionate approach would have assessed each location's realistic capacity, constraints, mitigation, infrastructure requirements, build-out rate, carbon impacts, existing employment, land-use change and alternatives, and then used that evidence to produce a programme-level comparison. **The issues and risks created by the approach taken should not be underestimated, they could reverberate for years and generate major delays and costs.**

As it stands, **the SEA cannot deliver against its own stated purposes.** The SEA says it is intended to identify, describe and evaluate likely significant environmental effects and reasonable alternatives, and to give consultees and the wider public the opportunity to comment on likely effects on them, their communities, and their interests. Those purposes cannot be achieved if the SEA does not identify where homes may be built, what land may be affected, which local assets, businesses, routes, and facilities may be at risk, or how the home capacity has been calculated.

Based on the information published, the SEA cannot do its job, and the public cannot properly comment on likely effects. Therefore, in our view, the approach taken by the SEA and wider consultation is neither proportionate nor adequate. Nor is it a fair and transparent consultation. Furthermore, there is a clear impression that the programme testing is engineered to support preferred pre-determined outcomes.

The methodological issues are described further below.

2.3 Overview of methodological issues

(a) The locations methodology has not been applied transparently

The Government has published a Locations Methodology for the New Towns Draft Programme. That methodology says locations were assessed against scale, economic growth, and deliverability. It also says new towns should deliver net additional outcomes compared with a defined business-as-usual reference case and should be able to deliver the planned number of homes without unreasonable spatial or other constraints.

Those are important tests. But for Crews Hill and Chase Park, **the evidence showing how those tests were applied has not been published.**

This is a serious weakness in the consultation. **The public is being told that Crews Hill and Chase Park is a preferred broad location, but has not been given the submission evidence, scoring, appraisal, assumptions, or judgement that led to that conclusion.**

The published methodology makes this problem more serious. Under Objective 4, Deliverability, it says the promoter will have identified significant barriers to delivery and measures to overcome them. That raises an obvious question: **what barriers did Enfield identify?**

Did Enfield accurately identify transport constraints, car dependency, Green Belt harm, ecological constraints, water and wastewater capacity, existing businesses, fragmented land ownership, infrastructure costs, public transport limitations, topography, sports and recreation loss, or the fact that Crews Hill and Chase Park are separate places? If so, **what measures did Enfield say would overcome those barriers? None of that evidence has been published.**

That is clearly not acceptable. **The public cannot reasonably be asked to comment while the actual deliverability case remains hidden.** If Enfield has identified the barriers and proposed ways to overcome them, the public should be able to see and comment on them. If Enfield has not identified those barriers, then Crews Hill and Chase Park should not have passed the deliverability test.

The Government has not published evidence showing:

1. what business-as-usual reference case was used for Enfield;
2. what level of housing was already expected through the Local Plan or other planning processes;
3. what extra homes, extra affordable homes, faster delivery, or higher standards would be delivered because of New Town designation;
4. what spatial constraints were identified;
5. how those constraints were judged not to be unreasonable;
6. what infrastructure assumptions were made;
7. whether Crews Hill and Chase Park were assessed separately or only as a combined location;
8. why a combined Crews Hill and Chase Park location was judged to be a coherent new town.

This is particularly concerning for Crews Hill and Chase Park because the preparation and examination of Enfield's draft Local Plan has identified multiple constraints and delivery

barriers at a scale less than half of that proposed by the new town. There is no published evidence to show how those constraints and barriers have been addressed.

Enfield Council have refused to publish the submission evidence and supporting material. Without that evidence, the public cannot test whether Crews Hill and Chase Park passed the Government's own methodology and if so, on what basis.

The consultation therefore asks the public to comment on the outcome of a selection process without publishing the evidence behind that outcome. That is not a fair or transparent basis for consultation. The Government should, as part of this consultation stage, provide this information and allow people to comment on it.

(b) The proposal appears to be based on misleading descriptions of the land

The SEA appears to treat too many existing assets as future development opportunities rather than constraints, assets, or places of value.

A core weakness is that the SEA does not start with an accurate, locally grounded baseline.

For Crews Hill and Chase Park, the SEA refers to much of the broad location as "low value land," including commercial nurseries, garden centres, golf courses, and lower quality greenfield land. That is a loaded assumption and not a neutral planning description. These are not unused sites. They include active businesses, employment uses, sports facilities, recreational assets, landscape features, public access routes, mature trees, important ecological networks, and valued parts of Enfield's countryside. Describing these areas as "low value" risks reducing existing communities, businesses, and environmental assets to a land assembly opportunity.

The same problem applies to physical assumptions. Crews Hill and Chase Park should not be treated as easy, flat, or unconstrained land. The broad location includes varied topography, established landscape structure, as well as existing settlements, railway, and road constraints.

This also links back to the problems identified in part 'a' above. It has not been possible for the public to properly assess the accuracy of the information supplied in the submission documents and supporting evidence because this information has been withheld.

This matters because baseline assumptions shape everything that follows. If land is wrongly treated as low value and unconstrained, then the assessment is likely to understate the harm, overstate the scope for viable mitigation, and give a misleading impression of deliverability.

(c) A new town, or two separate places?

A fundamental concern is that Crews Hill and Chase Park appear to have been joined together to meet the New Towns Programme's 10,000+ homes threshold, rather than because they form a coherent place or because joining them together is a sound placemaking strategy.

In Enfield's recent Local Plan process, Crews Hill and Chase Park were considered as separate locations. That reflects reality. They are separate places, several kilometres apart, with different

characters, transport connections, landscapes, constraints, and relationships with existing communities.

By joining them together, the proposal reaches the scale needed to be a “new town.” But that does not make it one. The combined geography appears to be driven by programme criteria rather than sound placemaking logic.

The SEA does not properly address this issue or its consequences. That is a serious omission. If two separate places have been joined together mainly to meet a numerical threshold, that affects land take, infrastructure planning, transport assumptions, landscape impact, identity, governance, and deliverability. A new town should be a coherent place, not separate urban extensions joined together on paper.

Again, it is not possible to properly assess this without the publication of the submission information and supporting evidence. As it stands, we have considerable doubts that Crews Hill and Chase Park can realistically be joined together to become a coherent new town.

(d) The 21,000 homes claim is not evidenced

The public is being asked to respond to a major proposal without knowing the land affected.

MHCLG has stated that boundaries have not been determined. Yet the consultation and SEA still proceed on the basis that Crews Hill and Chase Park could deliver up to 21,000 homes.

That is not a minor gap in the evidence. If the boundary has not been identified, and the actual sites and development parcels have not been shown, **it is unclear how anyone can have confidence that 21,000 homes is a realistic or deliverable figure.**

If 21,000 homes are realistically deliverable, it is unclear why that capacity did not emerge through Enfield’s own Local Plan process. After years of site assessment, Green Belt review and plan-making work, the Council treated Crews Hill and Chase Park as separate growth locations capable of delivering 9,000 homes. **The New Towns consultation more than doubles that figure without setting out what has changed.**

The number could be significantly lower once constraints are properly mapped. These include existing homes, businesses, horticultural land, schools, roads, railway constraints, woodland, mature trees, habitats, sports facilities, public rights of way, flood risk, landscape value, heritage assets, Green Belt purposes and publicly accessible countryside.

This matters because the SEA treats the 21,000-home figure as a measurable benefit, while the evidence needed to test that figure is not presented. A location should not score positively for a housing number unless there is a clear **and published** evidential basis underpinning it.

At the same time, the SEA indicates that major public, business, and recreational assets across a wide area of Enfield could be affected, including three major parks, three golf courses, sports clubs, and large areas of Enfield’s historic and publicly accessible countryside. **Yet the nature and extent of that impact is not explained.**

This creates a serious imbalance in the SEA. The housing benefit is presented as if it is real and measurable, while the land take, local harm and practical constraints remain vague.

It is not realistically possible for the public to meaningfully assess the proposal without knowing this information. Nor is it possible for the SEA to meaningfully assess the scheme, even at strategic level, without first establishing a better understanding of what land, assets, businesses, habitats, routes, and facilities may be affected, and the extent of the impact.

(e) The mapped broad locations may distort the SEA comparison

The SEA's mapping of broad locations is problematic. In most cases, the mapped circles are several times larger than the stated site or proposal area in the Taskforce material.

Taking Crews Hill and Chase Park as an example, the consultation material refers to a broad location of approximately 884 hectares, but the circular "indicative broad location" shown in the SEA appears to cover over 2,000 hectares. On that basis, **the mapped area is two to three times larger than the stated broad location area. That is a very substantial difference.**

The relationship between the mapped area within the circles and the Taskforce material varies significantly across locations. In some cases, the broad location identified within the circles appears to be around ten times larger than the stated size and for others it is around twice the size. This creates several problems for the reliability of the SEA.

Firstly, taking Crews Hill as an example, **it is unclear whether the SEA has assessed the 884 hectares area, the much larger circular area shown on the map, or some other undefined area within it.** The same lack of clarity applies to other sites. It is not possible to establish what was tested, or, importantly, whether the approach was consistently applied across sites.

Secondly, because the relationship between the stated size and the indicative broad locations is inconsistent across the sites it creates **an unreliable basis for comparing locations.** For example, if smaller, more compact alternatives are tested across disproportionately large indicative areas, their environmental impacts may appear worse than they would be if the actual land required for development were assessed or if a narrower "indicative broad location" were used. The risk is that the assessment results for each location are skewed by an unexplained quirk of the methodological approach taken for that location, making comparisons between locations unreliable.

The issues highlighted above should not be underestimated. **These are serious methodological problems that undermine the reliability of the assessment** of individual sites and particularly the credibility of the comparison between locations. Put simply, **the environmental impacts of the locations cannot meaningfully be compared.**

As already explained, one reason these issues arise is because of an underlying sequencing problem. The Government has carried out a programme-level SEA before undertaking sufficiently detailed location-level assessment. A more robust and meaningful approach would have started with detailed assessment of each potential location, including realistic development boundaries, constraints, land availability, infrastructure requirements, and environmental impacts. That location-level work should then have fed upwards into the programme SEA. Instead, the current approach defers important

questions until later, after preferred locations have already been selected. That approach has led to high levels of ambiguity, sufficient to raise serious doubts about the reliability and validity of the SEA.

(f) The SEA has not properly tested programme-level reasonable alternatives

Section 2.4 of the SEA raises concerns about the way reasonable alternatives have been identified and rejected.

Regulation 12(2) of the SEA Regulations requires the Environmental Report to identify, describe and evaluate the likely significant environmental effects of the plan or programme **and reasonable alternatives**, taking into account the objectives and geographical scope of the plan or programme. The SEA itself recognises this requirement and says that reasonable alternatives should be realistic, relevant and sufficiently distinct to allow meaningful comparison of their environmental implications.

However, **Table 2-1 of the SEA rejects every programme-level alternative as not reasonable**. This includes alternatives relating to whether the programme is necessary, how it should be delivered, the mix of locations, the typology of new towns, the treatment of local housing need, and whether there should be a new planning policy for new towns. **The result is that the SEA does not appear to assess any genuine programme-level alternative to the Government's preferred approach.**

This is particularly problematic because the SEA does assess six alternative broad locations. **The distinction between rejecting "an alternative set of locations" as a programme-level alternative, while then assessing alternative broad locations at place level, is not clearly explained.** Option 2a rejects the idea of taking forward an additional or different mix of locations, but the SEA then relies on the assessment of alternative locations as its reasonable alternatives testing.

That appears circular. The preferred programme is protected from programme-level comparison, while the alternative locations are assessed only after the preferred shortlist has already been framed.

The treatment of alternatives is also uneven. **Option 2c considers restricting the programme to greenfield new settlements and rejects that approach. However, the SEA does not appear to consider the opposite alternative i.e. a brownfield-first or urban-regeneration-first programme. That is a significant omission.** The SEA itself recognises that urban sites can help unlock growth constraints and may have existing development pipelines and early infrastructure capable of being accelerated by the programme.

A brownfield-first alternative should therefore have been considered as a realistic programme-level alternative, particularly given the scale of environmental harm identified for greenfield and mixed locations. Instead, the SEA tests a greenfield-only restriction but does not test whether the programme should prioritise brownfield, urban regeneration, existing infrastructure, or lower environmental harm before considering major greenfield release.

This matters for Crews Hill and Chase Park. The SEA starts from a broad indicative location and does not test whether the housing objective could be met through less harmful alternatives, including brownfield-first options, smaller-scale growth, alternative local distributions, or separate assessment of Crews Hill and Chase Park rather than treating them as a combined broad location.

A ground-up approach would first test local and site-level alternatives, including brownfield and reduced-boundary options, before deciding whether a broad location should be included in a national

programme. Instead, **the programme-level SEA starts from preferred broad indicative locations and leaves many of the most important local questions to later stages.**

The treatment of housing need in Table 2-1 raises a further concern. Option 2d considers an alternative under which new town housing would not contribute, or would only partly contribute, towards local housing need. The SEA rejects this as not reasonable, largely because it says there is no proposed new-towns-specific LHN policy, bespoke case-by-case options would be unreasonable without full detail of local circumstances and delivery vehicles, **and requiring new town housing to be additional to LHN could discourage local planning authority participation.**

That reasoning is one-sided. The SEA recognises one incentive problem i.e. that treating new town housing as additional to local housing need might discourage LPA participation. But it does not consider the opposite incentive problem. If a very large new town counts towards local housing need, it could reduce the incentive for the relevant LPA to identify, allocate, fund, unlock and deliver brownfield and regeneration sites elsewhere, particularly where those sites are more difficult. It could also encourage over-reliance on a single large proposal which may itself face major delivery, infrastructure, environmental and market-absorption challenges.

There is also a governance problem. If new town homes count towards an LPA's housing need, but delivery is then controlled wholly or partly by a separate delivery vehicle, such as a development corporation, the LPA may be relying on homes it does not fully control. That makes the relationship between local housing need, delivery responsibility and democratic accountability unclear. It is therefore not enough for the SEA simply to assume that all new town housing should count towards LHN. It should have tested different models and explained the consequences of each.

This is not a question of assuming that one approach is right and the other wrong. They both carry risks. **The problem is that the SEA considers one side of the incentive argument and ignores the other.** A reasonable alternatives assessment should have tested different approaches to the relationship between new town delivery and local housing need.

There are existing examples of strategic planning practice where large development areas or development corporations have been treated separately for housing target purposes. In London, London Plan Table 4.1 sets ten-year housing targets for each local planning authority, and the table includes the London Legacy Development Corporation and the Old Oak and Park Royal Development Corporation as separate planning authorities with their own targets. **The SEA should therefore explain why a comparable approach, or a partial additionality approach, was not considered a reasonable alternative for the New Towns Programme.**

The issue is not simply technical. It goes to the heart of the claimed benefits and environmental costs of the programme. If new town housing simply substitutes for housing that would otherwise have been delivered elsewhere through local plans, the claimed housing and population benefits are materially different. If it is additional to existing local housing requirements, the cumulative environmental effects are materially different. Either way, the question should have been tested.

The SEA acknowledges that it does not account for consequential changes in the future scale or location of housing growth outside the new towns and says those implications will need to be explored later through spatial frameworks, development plans, and planning applications. **That is a major limitation. It means the SEA gives weight to the housing benefits of the new town while**

deferring the question of whether those homes are genuinely additional, whether they displace other planned growth, and what environmental effects may arise from any changed pattern of housing delivery elsewhere.

It is also unclear whether later stages will include a genuine reasonable-alternatives assessment, or whether they will focus mainly on mitigation, boundaries, detailed design and project-level impacts after the strategic choice of location has already been made. The SEA says preferred locations will be subject to more detailed environmental assessment, and that further location-specific plan-level SEAs and/or project-level EIAs may be deployed “as appropriate.” But it does not clearly explain whether those later assessments will be capable of reopening the strategic question of whether Crews Hill and Chase Park is the right location at all, whether Crews Hill and Chase Park should be assessed and delivered separately, or whether there are better local alternatives, including brownfield-first options.

This matters because later evidence may do more than refine the proposal. It may show that the claimed housing capacity is not realistic, that the infrastructure requirements are too costly or complex, that mitigation is not deliverable, that brownfield alternatives perform better, or that the additional benefits of a new town do not outweigh the environmental and local harm. **The SEA does not appear to consider that possibility. Instead, it gives the impression that later assessment is expected to manage or mitigate impacts, rather than test whether the case for a new town has been made at all.**

That is a serious gap. Later EIA or local assessment may assess boundaries, mitigation, design and infrastructure. But unless the Government is clear now, there is a real risk that the strategic choice of location will have been made before local alternatives, brownfield-first options, reduced-boundary options, separate-location options and housing-substitution effects have been properly tested.

This reinforces the concern that the SEA has not clearly demonstrated a robust Regulation 12(2) assessment of reasonable alternatives. The issue is not that no alternatives have been considered at all. The issue is that potentially reasonable programme-level alternatives, including brownfield-first, different approaches to local housing need, partial additionality, different mixes of locations, and more locally grounded alternatives, appear to have been excluded before their environmental effects have been properly identified, described and evaluated.

The SEA should therefore be amended to explain:

- why no brownfield-first or urban-regeneration-first programme alternative was assessed;
- why a separate or partly additional housing-target approach was rejected, despite existing strategic planning examples such as OPDC and LLDC;
- how the programme has tested whether new town housing is additional to, or substitutes for, planned local housing growth;
- whether local reasonable alternatives will be tested before any broad location is confirmed;
- whether later plan-level SEA or project-level EIA will be able to change the decision to proceed with a preferred broad location; and
- how Crews Hill and Chase Park has been tested against local brownfield, reduced-boundary and alternative-distribution options.

Without that explanation, the reasonable alternatives assessment does not provide a clear or reliable basis for public consultation or decision-making.

(g) The treatment of South Barking shows why the alternatives assessment is not adequate

The SEA assesses six reasonable alternative broad locations. However, it does not provide an adequate comparison between Crews Hill and Chase Park and realistic lower-harm alternatives.

The question should be whether a large, substantially greenfield new town at Crews Hill and Chase Park would deliver more homes, more Social Rent, faster delivery, and greater public benefit than less harmful local alternatives.

An alternative that should have been tested includes a brownfield-led approach in Enfield and London, better use and reconfiguration of under-used urban and industrial land, stalled-site intervention, estate renewal, town-centre intensification, and smaller, carefully selected infill or edge-of-settlement sites where genuinely justified.

The SEA also does not clearly explain why urban brownfield alternatives, such as South Barking, have been rejected despite their better performance on land use and long-term townscape. That is another serious weakness in the assessment.

South Barking was assessed as a reasonable alternative capable of delivering over 48,000 homes. The SEA accepts that South Barking benefits from excellent connectivity, can contribute to economic growth in an overheating area, and has made good progress in bringing new homes forward. It also accepts that, because South Barking is an urban brownfield location, its long-term impacts on townscape and land use should be positive.

The stated reason for not taking South Barking forward appears to be that it comprises several sites at different stages of maturity, making it more challenging to create a single sense of place. **That is not a sufficient reason to prefer large-scale greenfield land at Crews Hill and Chase Park.**

If the Government is serious about brownfield-first development, placemaking challenges on urban brownfield land should be addressed through masterplanning, phasing, infrastructure investment, and delivery governance. They **should not be used as a reason to favour a greenfield and Green Belt location where the SEA itself identifies significant landscape and land-use harm.**

The point about placemaking coherence cuts both ways. Crews Hill and Chase Park has its own unresolved coherence problem. It combines two separate Enfield Local Plan growth locations which have not previously been justified as one coherent new town. During the Local Plan process, fragmented land ownership was also identified as a delivery issue at Crews Hill. That may be capable of being overcome, but it is still relevant to placemaking, phasing, governance, and coherence. A place made up of multiple ownerships, different existing uses and two separate growth areas is not automatically a coherent new town simply because it sits within a broad Green Belt boundary.

If South Barking's multi-site character counts against it, the same test should be applied to Crews Hill and Chase Park. Conversely, if coherence, ownership and placemaking issues can be overcome at Crews Hill and Chase Park through masterplanning and governance, they should not be treated as a decisive objection to South Barking.

The SEA's own scoring also shows that **South Barking performs better than Crews Hill and Chase Park on key brownfield and land-use issues.** For South Barking, the SEA identifies significant positive effects on Land Use, Geology and Soils in the short and medium term, and a neutral effect in

the long term. It also identifies a significant positive long-term effect on Landscape and Townscape. By contrast, Crews Hill and Chase Park is assessed as having negative or mixed effects on land use, geology, and soils, including significant negative effects in the medium and long term, and negative effects on landscape and townscape.

This reflects the basic difference between the two locations. South Barking is an urban brownfield regeneration proposition. Crews Hill and Chase Park would involve large-scale development of Green Belt and countryside.

That difference is also shown in the SEA baseline evidence. Table D-12 shows that Crews Hill and Chase Park is predominantly agricultural land, including 78% Grade 3 agricultural land, 17% urban land and 6% non-agricultural land. South Barking has no agricultural land recorded. It is shown as 7% urban and 93% non-agricultural land.

This matters because **the Government's approach turns the brownfield-first principle on its head**. A large urban brownfield location has been rejected mainly because placemaking is difficult, while a Green Belt location has been selected despite clear land-use, landscape, and coherence problems.

Before progressing Crews Hill and Chase Park, the Government should publish a clear comparison explaining why South Barking has been rejected despite its brownfield advantages, and why the unresolved coherence, ownership, placemaking, environmental and land-use problems at Crews Hill and Chase Park are considered more acceptable. Until that has been done, the preference for Crews Hill and Chase Park is not transparently justified.

The treatment of South Barking also raises a wider concern about the methodology. The SEA assesses six reasonable alternative broad locations, but **none are presented as a better overall option than the seven preferred locations. That is surprising**. A meaningful alternatives assessment should show real trade-offs and should explain clearly where an alternative performs better, where it performs worse, and why it has nevertheless been rejected.

The SEA does not present any reasonable alternative as a better overall option than the preferred locations. However, it does acknowledge that urban brownfield alternatives perform better on key land-use and townscape objectives than preferred greenfield or mixed locations, including Crews Hill and Chase Park. The Government has not transparently explained why those advantages are outweighed, or why the preferred shortlist remains intact despite the better brownfield performance of alternatives such as South Barking and Plymouth.

This has the appearance of policy-led evidence making. Rather than a neutral assessment testing which locations best meet programme objectives, the reasoning appears to work backwards from the preferred shortlist. Brownfield alternatives are acknowledged, assessed, and rejected, while the preferred locations remain in place despite clear environmental and coherence problems of their own.

(h) The additionality test has not been evidenced

The Locations Methodology says new towns should deliver **net additional outcomes relative to a defined business-as-usual reference case**. It says this could be through materially increasing the number of homes, accelerating delivery, or raising quality and affordability to programme standards

that would not be achieved without New Town designation. **That test has not been evidenced for Crews Hill and Chase Park.**

The Government has not published the business-as-usual reference case for Enfield. It has not shown what would happen under the Local Plan, what would happen through a brownfield-led alternative, or what would happen if Crews Hill and Chase Park were planned separately.

If some housing growth at Crews Hill and Chase Park, or within the wider broad location, was already expected through the existing planning pipeline, then the benefit is not the whole 21,000 homes.

The SEA has not shown how many of the claimed 21,000 homes would be genuinely additional, rather than homes already expected through other planning processes or homes that could displace brownfield delivery elsewhere.

The SEA also awards large locations the scoring benefit of a big headline housing number, without deducting what was already planned. **This is a serious methodological weakness.** It risks counting homes already expected through other planning processes as new programme benefits and therefore creating a false comparison between locations.

The consultation also fails to assess whether a large greenfield proposal at Crews Hill and Chase Park could displace brownfield delivery elsewhere. Housing delivery is affected by market absorption, development finance, grant, construction capacity, infrastructure delivery, public sector capacity, and political focus. A proposal of this scale risks diverting investment, officer time, public funding, and market demand away from brownfield regeneration elsewhere in the borough. This was one of the objections raised by the GLA during Enfield's Local Plan preparation regarding proposed developments at Crews Hill and at Chase Park. This is also especially important because the Government says it supports a brownfield-first approach, yet Crews Hill and Chase Park is mainly a greenfield proposal.

Furthermore, if new town homes count towards Enfield's housing targets, that could further reduce pressure to deliver housing elsewhere and further increase the risk of investment being directed away from urban regeneration areas and towards a large greenfield scheme instead.

The benefits of the proposed new town would be significantly reduced if it displaces other housing delivery or simply repackages housing already being planned. The Government should therefore publish an additionality assessment before treating Crews Hill and Chase Park as a preferred location.

(i) Missing baseline data

Important baseline information appears to be missing. This is not just our concern. At scoping stage, statutory consultees also raised issues about the adequacy and scope of the baseline evidence. The Environment Agency highlighted the need to consider significant infrastructure, including transport corridors, energy networks, water infrastructure, and strategic utilities, because these can shape the baseline, constraints, opportunities, cumulative effects, and assessment methods. Historic England also emphasised the need for appropriate evidence to establish the baseline and identify likely significant effects on the places most likely to be affected and noted that

strategic spatial plans and local plans had not been identified as key documents despite their relevance to broad locations.

Those concerns remain relevant to Crews Hill and Chase Park.

The SEA does not appear to establish the number and type of existing businesses and jobs that would be affected. Nor does it provide a sufficiently clear local environmental baseline. It should identify the number, location, status, and sensitivity of Sites of Importance for Nature Conservation that could be directly or indirectly affected. It should also identify mature trees, habitat networks, public rights of way, sports and recreation uses, landscape assets, food-growing land, flood risk, water constraints, transport constraints, and existing community assets.

Without that baseline, the assessment cannot properly identify harm, test mitigation, compare alternatives or assess whether the location is suitable.

(j) Too many unresolved assumptions / optimism bias

The SEA repeatedly treats major risks as matters that can be dealt with later through masterplanning, mitigation, lower-tier assessment, infrastructure planning, or project-level design. But if the assessment repeatedly proceeds on the basis that transport, ecology, landscape, water, infrastructure, employment, carbon and community impacts can be resolved later, then **it is not properly testing whether Crews Hill and Chase Park is suitable now**. It risks indirectly assuming the location can be made suitable, rather than testing whether that is actually the case.

With that approach, **it is not realistically possible for Crews Hill and Chase Park to fail the SEA test**. That is a fundamental weakness. If every major problem is treated as something that can be resolved later, the SEA risks becoming a process for rationalising a preferred outcome rather than testing it. In our view, this is **a clear example of “optimism bias.”**

A meaningful assessment must be capable of concluding that a location is unsuitable, that development should be reduced, that boundaries should change, or that key constraints must be treated as non-negotiable. The SEA does not meet that standard.

(k) A poor basis for comparing locations

The SEA uses a 25-year build-out assumption across all locations, despite very different scales and complexities. **That creates an unbalanced and unrealistic comparison.**

Larger locations get the benefit of higher housing numbers in the assessment but are not marked down for longer build-out periods, greater infrastructure complexity, higher delivery risk, prolonged construction impacts, and delayed public benefits. **That is not a balanced assessment.**

The build out rates for large sites are also not realistic. For example, the SEA assumes an average annual delivery rate 840 homes per year at Crews Hill and Chase Park, without providing any evidence to show that such a rate - sustained over 25-years - is realistic. Publicly available evidence on build out rates does not support the assumed delivery rate for large sites.

As it stands, the SEA is not sufficient to reliably compare sites or to support decisions about individual sites.

(i) The scoring is too compressed to support meaningful comparison

A check of the SEA scoring table shows how compressed the assessment is. Across the seven preferred locations, the SEA assesses 11 objectives over three time periods (short, medium, and long term). That creates 33 objective/time-period scores per location. Each score can receive one of seven possible outcomes.

In 16 of those 33 cases, all seven preferred locations receive exactly the same score. That is 48.5% of the assessment. In 22 of the 33 cases, at least six of the seven locations receive the same score. That is 66.7% of the assessment.

The level of uniformity across locations and time periods is not realistic for locations that are so different. The preferred locations include brownfield urban regeneration schemes, mixed locations, major greenfield releases, and very large new settlement proposals ranging from around 15,000 homes to more than 40,000 homes. Yet **across large parts of the SEA, they are scored in exactly the same way over all three time periods.**

Rating compression is especially clear for Air Quality, Climate Change, Health and Wellbeing, and Population. For each of those objectives, every preferred location receives exactly the same short, medium, and long-term score pattern. That means a 15,000-home urban regeneration location, a 21,000-home mainly greenfield location, and 40,000-home-plus locations are presented as having identical effects across some of the most important assessment areas.

This strongly suggests that the assessment approach is too formulaic and too blunt to distinguish meaningfully between locations. It appears to apply broad programme-level assumptions across very different places, rather than building the assessment up from the particular characteristics, constraints, risks, and delivery realities of each location.

This is the end result of conducting the assessments in the wrong order. A proportionate programme-level SEA should have been grounded in robust location-level assessments. That means the first stage should have been some form of location specific SEA testing, including of the proposed locations realistic capacity, land-use change, infrastructure requirements, build-out rate, carbon impacts, health impacts, employment impacts, mitigation requirements, and alternatives. That evidence should then have been used to produce a programme-level comparison.

Instead, **the SEA risks giving the appearance of comparative assessment without providing a reliable basis for comparison.** The result is that **materially different locations are made to look the same.** That significantly weakens the SEA as a tool for deciding the value of the programme itself and which locations should go forward.

2.3 The Government should clarify the status of this stage

The status of this consultation stage is unclear. The Government has published some broad next steps, including an intention to confirm locations later in summer 2026, presumably before any detailed location-level SEAs are conducted.

However, it has not published a clear route map explaining each stage of the process, the purpose of each stage, what evidence will be published, what further consultation will take place, and what passing from one stage to the next would and would not mean. The Government should publish that route map before any decision is taken to progress Crews Hill and Chase Park to the next stage.

Given our serious concerns about the adequacy of the current consultation, the SEA and the missing evidence, we are very concerned that responses to this stage could be treated as support for progressing Crews Hill and Chase Park, even though the public has not been given enough information to make an informed judgement.

The Government should confirm that passing this stage would not approve the principle of a new town at Crews Hill and Chase Park, and that the location could still be rejected later if the detailed evidence shows that it is unsuitable, undeliverable, environmentally harmful, or unable to meet the programme objectives.

If the Government is unable to confirm this, then it should not rely on the results of this consultation stage as a mandate to progress Crews Hill and Chase Park. Instead, it should re-run this stage of consultation once the relevant evidence has been published, and once the inaccuracies and methodological flaws in the assessment have been addressed.

3. QUESTIONNAIRE RESPONSES (Q7-25)

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: Crews Hill and Chase Park, Enfield

Crews Hill and Chase Park have positive features which could, in principle, contribute to the objectives of the New Towns Programme. However, they should not be confused with a proven case for a single new town.

Crews Hill and Chase Park contain significant assets. These include distinct landscape character, existing businesses, a long-established horticultural cluster, access to open countryside, public rights of way, historic landscape value, ecological assets, and publicly owned land.

Treated properly, these assets could help shape positive development. Publicly owned land could provide an opportunity to deliver genuinely affordable housing and Social Rent at scale. Existing horticultural, rural and leisure uses could help give future development a distinctive identity. Existing public rights of way and green infrastructure could support healthy, walkable neighbourhoods.

But these features are only positive if they are recognised, protected, and used to shape any future planning. At present, too much of the public case for the proposed new town treats the land as empty, low value or available for development.

That is not an evidence-based starting point. The assessment method should treat existing features as baseline assets, not as blank land or future mitigation opportunities.

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 and Chase Park

Crews Hill and Chase Park face barriers which could hold back delivery.

First, **the proposal appears to have been cobbled together to meet the New Towns Programme's 10,000+ homes threshold, rather than because Crews Hill and Chase Park form a coherent single place.** In Enfield's Local Plan, Crews Hill and Chase Park have been treated as separate growth locations. That is because **they are separate places**, with different characters, constraints, transport connections, and relationships with existing communities.

The New Towns Programme has joined them together. But that appears to be a consequence of the programme's scale criteria, **not a sound placemaking strategy.** The two areas are roughly 4 to 5 km apart, and no convincing centre of gravity, shared town centre, unified transport hub, or everyday functional relationship has been demonstrated. **A new town should be a coherent place, not two separate urban extensions joined together on paper to reach a housing threshold.**

Second, **the transport case is unresolved.** Transport for London raised serious concerns through the Enfield Local Plan process about growth at Crews Hill and Chase Park at a much smaller scale, including whether the transport impacts could be mitigated and whether the location would become car-dependent. A low-car or car-lite settlement cannot be delivered by assertion. It would require major **early and sustained investment** in rail, buses, walking and cycling, strict parking controls, step-free access, enforceable mode-share targets and clear "no infrastructure, no occupation" triggers. Without that, the risk is predictable: high car ownership, congestion, overspill parking, pressure for road widening and long-term car dependency. **Even then, the scale of highway intervention likely to be required, including bridges, road widening and multiple new junctions, raises serious questions about whether this can credibly be described as a sustainable, low-car location.**

Third, **the proposal is in direct tension with a brownfield-first approach.** The SEA's own land-cover assessment identifies the broad location as about 65% greenfield land. That is not a parcel-level survey, but it confirms this is not a mainly brownfield proposal. Enfield's Local Plan identifies more than 700 viable brownfield sites with capacity for around 30,000+ homes, and community groups have identified further brownfield capacity. **Releasing greenfield land at this scale risks diverting investment, political attention, public funding, officer capacity, and market demand away from brownfield regeneration elsewhere in the borough.**

The issue is not whether a new town could produce homes in theory, it is whether those homes would be genuinely additional to brownfield delivery. Housing delivery is not unlimited. It is constrained by demand, sales rates, absorption rates, development finance, construction capacity, infrastructure delivery, public sector capacity, and the availability of skilled labour. A large greenfield new town could slow brownfield delivery in the same housing market area, rather than add to it.

The Government should publish an additionality assessment before treating Crews Hill and Chase Park as a preferred location. That assessment should compare different scenarios: brownfield-first delivery, new town-led delivery, and combined delivery. It should ask which delivers the most homes, the most Social Rent, the fastest delivery, the least environmental harm, and the

greatest public benefit. **Without that, the claim that the new town would accelerate housing delivery is unproven.**

The assessment should also **test realistic build-out rates**. The SEA assumes delivery over 25 years, which implies average delivery of around 840 homes per year at Crews Hill and Chase Park. **That is an over-optimistic and unevidenced delivery assumption.** The Government should test the impact of slower more realistic delivery scenarios.

Fourth, **the area is not empty**. It contains businesses, horticultural and rural enterprises, leisure uses, public rights of way, productive farmland, historic landscape, and ecological assets. These should be treated as both constraints and assets, not as inconveniences to be explained away.

The Government must establish how many existing jobs and businesses are affected, what sectors they are in, what supply chains they support, whether they can realistically remain in place, and whether any future jobs would be comparable, accessible, and delivered in time. The Government must not allow existing jobs to be lost, especially for vague future employment opportunities.

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

In its current form, **the SEA risks underplaying the environmental consequences of the proposal and giving a misleading impression that key issues can be dealt with later.**

A major problem is that **the SEA is too high-level**, especially 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 is a serious weakness. The public is being asked to comment on a broad location for up to 21,000 homes while the environmental assessment does not make full use of the evidence available.

The SEA also does not properly explain the relationship between environmental harm and delivery risk. It identifies broad negative effects, but it does not sufficiently test whether the positive effects relied on to outweigh those harms are deliverable, funded, phased and genuinely additional. **Unevidenced future benefits should not be used to justify certain local harm unless the mechanism for delivering those benefits is clear.**

The SEA should not simply identify generic environmental issues. It should test whether this specific location can realistically accommodate development at the scale proposed. That means assessing the actual ecological value of the land, Sites of Importance for Nature Conservation, veteran and mature trees, public rights of way, historic landscape, food-growing and horticultural land, flood risk, water and wastewater capacity, air quality, noise, transport impacts, and the carbon consequences of large-scale greenfield development.

The SEA also under-explains the climate change implications of large-scale greenfield development. It acknowledges that permanent land take can cause a permanent loss of carbon sequestration in soils, **but it does not appear to quantify that loss or distinguish clearly between brownfield regeneration and greenfield release.** Instead, the climate assessment relies heavily on a broad per-dwelling carbon proxy, future building standards, grid decarbonisation, and comparison with national carbon budgets. That is not enough for a location such as Crews Hill and Chase Park, where the climate impact is not only the carbon cost of buildings and infrastructure, but also the permanent loss or sealing of greenfield soils and vegetation that currently store carbon and could continue to sequester carbon in future.

The SEA should also correct or explain apparent inaccuracies and omissions in its local baseline for Crews Hill and Chase Park. These include the number, location and status of Sites of Importance for Nature Conservation within or close to the broad location; the ecological value of connected habitats; the area's topography and gradients, which affect walkability, cycling, accessibility and the credibility of a low-car settlement; and the existing transport constraints, including TfL's concerns about car dependency and whether impacts can realistically be mitigated.

There also appears to be baseline accuracy issues in the SEA. For example, Table D-7 appears to record zero conservation areas for Crews Hill and Chase Park and only one Registered Park and

Garden. This should be checked against Enfield's own heritage evidence and Historic England's records, which identify relevant heritage assets including Trent Park Conservation Area, Clay Hill Conservation Area, Trent Park Registered Park and Garden and Myddelton House Registered Park and Garden. The point is not that this alone determines the suitability of the location, but that the baseline should accurately record designated heritage assets before any conclusions are drawn about likely effects.

The SEA should assess whether Crews Hill and Chase Park should be considered separately. If the two areas have only been combined to meet the New Towns Programme threshold, that has environmental consequences. It may encourage a larger land-take than is needed, blur site-specific constraints, and mask the different impacts of development in each area.

The SEA should also assess reasonable location alternatives, including brownfield-led alternatives in Enfield and London. 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.

We have also highlighted multiple methodological issues in Section 2.1 – 2.3 of this response, which also need to be considered here as part of our response to Question 9.

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

The SEA should consider the large volume of evidence available through the Enfield Local Plan process and fill the remaining gaps with proper location-specific evidence. 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. This should include the **Green/Grey Belt assessment carried out by the GLA**.
2. The **detailed ecological evidence**, 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, including the London Loop, Merryhills Way, the Hertfordshire Chain Walk and their social value.
4. Evidence on **existing recreation and sports value**, including current use, accessibility, capacity, replacement requirements, and their social value.
5. **Transport evidence**, including TfL's position statements, transport modelling, rail capacity, bus feasibility, parking assumptions, mode-share assumptions, car ownership, topography, gradients, severance, and the challenge of delivering a genuinely car-lite settlement in this location.
6. Evidence on **air quality**, including baseline conditions, construction impacts (over a plausible delivery period), traffic-related emissions, cumulative impacts with nearby roads including the M25 and A10, and the implications for homes, schools, parks and walking and cycling routes.
7. A proper **baseline on existing employment**, including horticultural, retail, leisure, equine, rural and other businesses whose future could be put at risk.
8. Evidence on **productive land, including horticultural uses, soils, and growing capacity**. This should include detailed Agricultural Land Classification evidence.
9. Evidence on **water**, including supply, wastewater, drainage, flood risk, sustainable drainage, greenfield runoff, water quality, water stress, catchment impacts, and climate resilience, including whether water plans have actually tested the scale and timing of growth proposed.
10. Evidence on **noise**, including road, rail and aircraft noise, and the impact on the liveability of homes, schools, parks, play spaces and outdoor amenity.
11. A full **carbon assessment** which separates building carbon from land-use change, **including the loss of soil carbon, vegetation carbon, and future sequestration**.
12. A **separate assessment of Crews Hill and Chase Park as distinct locations**, including their different constraints, transport catchments, landscape settings, and development capacities.

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

The starting point should be avoidance, not mitigation. The first question should be whether harm can be avoided by choosing a different location or alternative approach, such as focussing on delivering Enfield's significant brownfield capacity.

If Crews Hill and Chase Park remain under consideration, **mitigation must be specific, funded, enforceable and tied to clear triggers**. At a minimum:

- all key evidence, assumptions and options appraisal material should be published before any further policy lock-in;
- Crews Hill and Chase Park should be tested separately, so each location's scale and form of development respond to its own capacity, constraints and placemaking logic;
- site boundaries should be redrawn around the evidence, with SINC's, irreplaceable habitats, mature and veteran trees, important hedgerows, ecological corridors, public rights of way, historic landscapes and productive land treated as constraints from the outset;
- there should be a binding brownfield-first test before greenfield land is released;
- infrastructure should be identified, costed, funded, phased, and tied to occupation triggers, rather than treated as an assumed benefit;
- there should be a clear "no infrastructure, no occupation" rule, covering transport, schools, health, water, wastewater, drainage, green infrastructure, and community facilities;
- transport mitigation should be enforceable, including step-free rail access, improved rail frequency, bus priority, safe walking and cycling routes, parking restraint, controlled parking to prevent overspill, and mode-share monitoring with consequences if targets are missed;
- existing businesses and jobs should be protected, with funded relocation, compensation, and transition support where change is unavoidable;
- public land should deliver permanent public benefit, especially Social Rent housing.

Mitigation should not be used to make an unsuitable location appear acceptable. It should only be relied on where it is shown to be capable of being delivered before harm occurs.

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

Yes. We have identified multiple methodological issues in Section 2.1 to 2.3 of this response, which we ask be considered alongside the comments below.

The SEA is being used to support decisions about which new town locations should go forward. The public therefore needs enough information to understand how Crews Hill and Chase Park was selected, what alternatives were rejected, what assumptions were used, and what environmental trade-offs are being made. At present, the consultation does not provide that information.

Methodological concerns

The SEA is not a full Treasury Green Book business case, and we are not suggesting that it must be one. However, if the SEA is being used to compare locations, justify preferred options or support claims about public benefit, it still **needs to answer basic appraisal questions clearly**. What would happen anyway? What is genuinely additional? What costs and harms arise? When do benefits arrive? Who gains? Who loses? What risks could affect delivery? **Those questions have not been answered clearly enough.**

There is also a specific problem with the relationship between the SEA and the published Locations Methodology. The Locations Methodology says potential new town locations were assessed against scale, economic growth, and deliverability. It also includes tests on net additionality, spatial constraints, infrastructure and whether the planned number of homes can be delivered without unreasonable constraints. **However, for Crews Hill and Chase Park, the consultation does not publish the evidence showing how those tests were passed.**

This is not a minor process point. The Locations Methodology appears to be the gateway through which Crews Hill and Chase Park became a preferred broad location. **If the evidence behind that gateway decision is withheld, the public cannot properly test or be given the opportunity to understand the basis on which the location was selected.**

The Locations Methodology also says that, for Objective 4 on deliverability, the promoter will have identified significant barriers to delivery and measures to overcome them. That is directly relevant to Crews Hill and Chase Park. However, **the consultation does not publish the promoter's evidence. It does not tell the public what barriers Enfield identified, what mitigation or delivery measures it proposed, or how MHCLG judged those measures to be adequate.**

This matters because many of the likely barriers are obvious and substantial: transport capacity, car dependency, Green Belt harm, ecological constraints, water and wastewater capacity, existing businesses and jobs, sports and recreation land, public access to countryside, infrastructure costs, land assembly, and the lack of evidence that Crews Hill and Chase Park function as one coherent place. **If Enfield identified those barriers, the evidence should be published. If Enfield did not identify them, that is even more concerning. Either way, the public cannot assess the deliverability of the proposed new town without seeing the promoter's own assessment of barriers and the measures said to overcome them.**

The SEA appears to give weight to uncertain future benefits, including housing delivery, infrastructure, affordable housing, land value capture, biodiversity net gain, landscape mitigation, and future

employment opportunities. But it **does not clearly distinguish between what already exists, what is already committed, what would be genuinely additional, and speculative future mitigation.**

This is particularly important where existing or already planned environmental projects are referred to as possible mitigation. For example, any reliance on Enfield Chase Landscape Recovery should distinguish between restoration that is already complete, funded, planned or underway, and restoration that would be genuinely additional because of the new town. **Existing public benefit should not be counted again as mitigation for new harm.**

Crews Hill and Chase Park already contain businesses, jobs, horticultural activity, sports and leisure uses, public access, landscape value, and ecological assets. They **should not be treated in the SEA as acceptable losses on the basis of unevidenced and vague future benefits.**

This concern is heightened because Crews Hill and Chase Park have already been subject to detailed local assessment through the Enfield Local Plan process. The Government and its consultants should therefore already be aware of key issues and evidence gaps. But **the SEA has not clearly used, summarised or responded to that detailed local evidence.**

The purpose of an SEA should be to help decision-makers understand whether a location is suitable in principle, what the strategic constraints are, and whether any constraints are serious enough to affect selection. But for Crews Hill and Chase Park, **too many hard questions are deferred to later masterplanning, lower-tier assessment, project-level design or mitigation.**

The SEA appears self-confirming. If every problem is treated as something that can be resolved later, the SEA is not really testing whether the location is suitable. It is assuming that the location can be made suitable, provided enough future work is done. **That, in our view, is optimism bias.**

The test should be different. "This can be assessed later" is not the same as "this location is suitable now." The SEA should identify which issues are genuinely capable of mitigation, which are uncertain, which require further evidence before selection, and whether any constraints are significant enough to prevent or reduce development at this location.

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

At present, **the SEA does not identify clear "hard stops" or non-negotiable constraints** for Crews Hill and Chase Park, even where the proposal may affect SINCs, mature ecological networks, productive land, existing businesses, public rights of way, transport capacity, water infrastructure, and Green Belt.

If the SEA cannot say what level of harm would be unacceptable, or what constraints would rule out development, then it cannot provide a meaningful safeguard against a poor location being taken forward.

The SEA also **uses a standard 25-year build-out assumption** across locations of very different scale and complexity. That creates a false comparison. Larger locations appear to get the benefit of higher housing numbers in the assessment, but do not appear to be marked down for longer build-

out periods, greater infrastructure complexity, higher delivery risk, prolonged construction impacts, and delayed public benefits. **That is not a realistic or balanced assessment.**

For Crews Hill and Chase Park, delivery of up to 21,000 homes over 25 years implies an average of 840 homes per year. That is **exceptionally high and, based on the evidence, very over-optimistic.** The SEA should test realistic build out rates for each location.

The same concern applies to climate change. The SEA finds limited differences between locations because it uses a standard 25-year build-out assumption, broad carbon assumptions, and compares estimated emissions with national carbon budgets. **That approach can make very different schemes appear similar, or even identical, in climate terms, even where one is a brownfield urban regeneration proposal and another involves large-scale greenfield release.**

That is not a sufficient basis for comparing locations. The SEA should provide a location-by-location carbon assessment which separates construction carbon, infrastructure carbon, transport emissions, land-use change, soil carbon, vegetation carbon and the loss of future carbon sequestration. It should also test whether a slower and more realistic build-out rate would prolong construction emissions, traffic emissions, and soil disturbance.

The results should not only be benchmarked against national carbon budgets, as this masks the harm. They should also be compared with each other, so that decision-makers and the public can see which locations have higher or lower carbon impacts, and whether brownfield alternatives would deliver the programme objectives with less climate harm.

What this means for the SEA

Taken together, these methodological problems mean that the SEA does not provide a sound basis for treating Crews Hill and Chase Park as a preferred new town location at this stage.

We recognise that more detailed work would be required if any location is taken forward. But that does not answer the concern. The purpose of this SEA is not merely to list issues for later consideration. It is meant to inform the selection of locations, assess reasonable alternatives, identify likely significant effects, and help decision-makers understand whether a broad location should be taken forward at all.

This is also a failure against the SEA's own stated purposes. Section 1.2 of the Environmental Report says the report is intended to ensure that the likely significant environmental effects of the draft New Towns Programme and reasonable alternatives are **identified, described, and evaluated.** It also says the report is intended to give statutory consultees, stakeholders and the wider public the opportunity to review and comment on the likely environmental effects that the draft programme may have on them, their communities and their interests, and to inform consultation responses.

For Crews Hill and Chase Park, **those purposes cannot be met on the information currently published.** The SEA cannot properly identify, describe, and evaluate likely significant effects if it does not show where homes may be built, what land may be taken, which assets may be affected, or how the 21,000-home capacity has been calculated. Nor can the public properly comment on likely effects on them, their communities or their interests without that same information.

This is not just a gap in detail. It goes to the purpose of the Environmental Report itself. If the SEA is intended to assess likely significant effects, compare reasonable alternatives and enable meaningful public comment, it must provide enough location-specific information to make that possible. At present, for Crews Hill and Chase Park, it does not.

On that test, the SEA does not do enough. **Key matters remain unresolved**, including the boundary, the land actually affected, transport deliverability, ecological constraints, employment impacts, infrastructure requirements, mitigation, build-out rates, additionality, and reasonable alternatives.

If those matters are left unresolved until after the location is selected, the SEA is not properly informing the decision. It risks becoming a post-hoc justification for a preferred location, rather than a genuine assessment of whether that location should be preferred.

This creates a serious risk of decision lock-in and delivery displacement. If Crews Hill and Chase Park is selected now on the basis of an incomplete SEA, the Government may later find, after more detailed work, that the location is more constrained, less deliverable, more harmful or less beneficial than assumed. In practice, once a location has been selected, political, administrative and financial momentum may make it much harder to reverse course.

The greater risk is that attention then shifts from delivering homes on more realistic sites elsewhere in Enfield to trying to make this location work. Officer capacity, public funding, infrastructure planning, political focus, and market interest could be diverted towards a proposal that may take many years to deliver at scale, if it can be delivered at all.

Enfield has already seen how major regeneration promises, for example at Meridian Water, can absorb years of attention while delivery falls far behind the original claims. **The New Towns Programme should not repeat that pattern at even greater scale.**

That is why the SEA must properly test deliverability, additionality, and alternatives now, before the location is selected, not after.

Consultation fairness and evidence submission

This is also a basic consultation fairness issue. Public law principles require consultation to take place while proposals are still at a formative stage. Consultees must be given enough information to provide an intelligent response, and decision-makers must conscientiously consider those responses before a decision is made.

For Crews Hill and Chase Park, that requires more than a high-level SEA and short questionnaire boxes. **It requires publication of the key evidence, reasonable alternatives, and a clear route to submit supporting technical material as evidence.**

The HRA should have been published with the consultation material. The SEA confirms that the outcomes of the HRA process will be taken into account before adoption of the New Towns Programme. If that assessment had already been completed, withholding it from the public consultation means respondents were not given the full environmental information needed to comment meaningfully on the draft programme.

This is particularly serious because the HRA may affect whether locations can proceed, what mitigation is required, and whether the programme can be adopted at all. The Government should publish the HRA, any Natural England or other statutory consultee comments on it, and a clear explanation of how the HRA has influenced the assessment of Crews Hill and Chase Park. If the HRA contains findings, uncertainties, or mitigation requirements relevant to these locations, the public should be given a further opportunity to comment before any decision is made to adopt or progress the programme.

The SEA should be revised to include a clear audit trail. It should explain:

- what evidence has been reviewed;
- what evidence has not been reviewed;
- how Local Plan evidence has been used;
- why Crews Hill and Chase Park have been combined;
- whether either area was assessed separately;
- whether either area would meet the programme threshold on its own;
- where the SEA agrees or disagrees with Local Plan evidence;
- what reasonable alternatives have been assessed;
- what uncertainties remain;
- what further evidence is needed before any decision can be made.

Without that audit trail, and the publication of key evidence, the SEA cannot possibly provide a reliable basis for selecting Crews Hill and Chase Park, and the public cannot properly test the case for taking the location forward.

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. That does not mean nothing should ever be built there. It means **the case for a single new town of up to 21,000 homes has not been made.**

The Draft Programme says the seven broad locations were proposed following "assurance work and environmental assessment." **However, the assurance work has not been published or explained in any meaningful location-specific form.** That matters directly to this question. If the Government is asking the public whether these are the seven locations most likely to meet the programme objectives, **it should publish the evidence showing how that judgement was reached.**

This is especially important because the Locations Methodology appears to be the gateway through which Crews Hill and Chase Park became a preferred broad location. The methodology says locations should deliver net additional outcomes compared with a defined business-as-usual reference case and should be able to deliver the planned number of homes without unreasonable spatial or other constraints. It also says that the promoter will have identified significant barriers to delivery and measures to overcome them.

For Crews Hill and Chase Park, the public has not been shown that evidence. We do not know what business-as-usual reference case was used, what additionality was claimed, what spatial constraints were identified, what barriers Enfield accepted, or what measures Enfield proposed to overcome those barriers. Nor do we know whether the assurance work tested the claimed 21,000-home capacity, infrastructure requirements, transport constraints, land ownership, environmental limits, existing employment impacts, public transport feasibility, affordability, governance, and delivery risk.

The Government should also publish whether Crews Hill and Chase Park were assessed separately or only as a combined broad location, and whether any caveats, risks or conditions were identified. Without that information, the public is being asked to comment on the outcome of an unpublished selection process rather than the evidence behind it.

That is especially problematic because Enfield's own Local Plan process assessed Crews Hill and Chase Park at a much lower scale and as separate locations. After years of site assessment, Green Belt review and plan-making work, the Council treated them as separate growth locations capable of delivering around 9,000 homes overall, with around 5,900 expected by 2041. The New Towns consultation now presents them as one broad location capable of up to 21,000 homes, without explaining what has changed, what additional land is assumed, what constraints have been overcome, whether homes would be delivered faster, or why the Local Plan evidence should be disregarded.

The proposal also fails a basic additionality test. It has not been shown that a new town at Crews Hill and Chase Park would add to brownfield delivery, rather than partly displace it. Large-scale greenfield release may compete with brownfield sites for investment, grant, construction capacity, buyers, planning capacity, and political focus. If that happens, the new town would not simply add to

Enfield's housing delivery. It would partly substitute for brownfield delivery, with greater environmental cost and weaker alignment with brownfield-first policy.

This concern is reinforced by the consultation documents themselves. The Draft Programme says new town housing should contribute towards meeting the identified housing need of relevant strategic and local planning authorities. The SEA also states that new town proposals may reduce the scale of new homes and allocations required outside new towns to meet identified housing needs through local, joint and neighbourhood plans. **The headline figure of up to 21,000 homes therefore cannot be treated as automatically additional.**

The Government should explain clearly whether homes at Crews Hill and Chase Park would count towards London's housing targets, Enfield's housing requirement, any development corporation target, or some combination of these. It should also explain what effect that would have on housing expected elsewhere.

Before Crews Hill and Chase Park is treated as a preferred location, the Government should publish a comparative delivery assessment showing whether a new town-led approach would actually deliver more homes, more affordable homes and more Social Rent than a brownfield-led approach over 5, 10, 15, 20 and 30 years.

The consultation also fails to present a realistic alternative strategy. Given the Government's stated brownfield-first policy, brownfield sites should have been given additional weight in the selection process. A reasonable alternative would be a brownfield-led delivery strategy across Enfield and London, supported where justified by smaller, carefully selected Green Belt infill or edge-of-settlement sites, rather than relying on a very large greenfield new town.

The Government should not simply compare "new town" with "no new town" or just with "other new towns." It should compare realistic delivery options, including brownfield-led delivery, brownfield plus smaller Green Belt infill, Crews Hill alone, Chase Park alone, and the combined Crews Hill and Chase Park new town. **Without that comparison, the claim that the seven proposed locations are the best way to meet the programme objectives is not evidenced.**

There is also a more basic concern. **Crews Hill and Chase Park appear to have been combined to meet the New Towns Programme's 10,000+ homes threshold.** But in planning and placemaking terms they remain separate places. **Programme eligibility is not the same as placemaking credibility.**

The House of Lords Built Environment Committee warned that new towns need more than numerical housing targets. They need a clear vision, early infrastructure, meaningful engagement, locally distinctive placemaking, health and inclusion designed in from the start, and long-term stewardship.

On the evidence currently published, Crews Hill and Chase Park has not passed those tests. 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.

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

Answer: Not sure

We support the principle that any new town would need strong government backing. However, the Government offer is not meaningful unless it is tied to clear evidence, funding, phasing, governance, and enforceable public benefit.

References to infrastructure-first delivery, land value capture, public transport, stewardship, and affordable housing should be backed by location-specific delivery plans. Land value capture should not be treated as a general answer to every problem. The Government should show how land value would actually be captured, what infrastructure and mitigation would cost, who would pay, and how affordable housing and long-term stewardship would be secured.

For Crews Hill and Chase Park, the offer is not adequate unless it explains why two separate areas are being combined, what infrastructure would be delivered early, how existing businesses and greenfield land would be protected, how brownfield-first delivery would be safeguarded, and how residents and businesses would be supported to engage with the process.

Without those commitments, the Government offer risks becoming a set of aspirations rather than a deliverable programme. It also risks accelerating development before the public interest case has been made.

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

Answer: Yes

The Government should go further to ensure design and placemaking quality.

For Crews Hill and Chase Park, placemaking should start with what is already there. Existing horticulture, garden centres, rural businesses, sports and recreation uses, public rights of way, mature trees, landscape features, and local identity should be assessed as potential placemaking assets. **The current process appears to treat too many of these as obstacles to be displaced rather than assets to be retained and incorporated.**

First, **the Government should require every new town to start with a published baseline of existing assets and constraints.** For Crews Hill and Chase Park, that means mapping existing businesses, jobs, public rights of way, ecology, landscape, heritage, food-growing, transport constraints, water constraints and community assets before masterplanning begins.

Second, **the Government should require a coherence test for any proposed new town made up of more than one area.** If two or more locations are being joined together to meet the 10,000+ homes threshold, the Government should publish evidence showing why they function as one place. That evidence should identify the shared centre of gravity, transport spine, town centre, civic heart, and everyday relationship between the areas.

Third, **the Government should require independently facilitated co-design at the earliest stage.** This should involve residents, businesses, workers, young people, disabled people, renters, households in temporary accommodation and potential future residents. Engagement must happen before choices are narrowed, not after a preferred option has effectively been chosen.

Fourth, **design codes should be genuinely co-produced and enforceable.** They should cover density, height, street design, parking, green infrastructure, public access, biodiversity, play space, family housing, accessibility, community infrastructure and stewardship.

Fifth, **there should be independent design review with community representation.** Design quality should not be left to later negotiation with developers.

Sixth, **public land should be used to set a higher standard.** Where public land is involved, it should deliver permanent public benefit, including 100% genuinely affordable housing and 50% Social Rent, high-quality green and blue infrastructure, and long-term community stewardship.

Seventh, **the Government should require early social, cultural, health and community infrastructure.** The House of Lords Built Environment Committee recommended that essential community, health and social infrastructure should be in place from the date the first residents move in.

Eighth, **car-lite design must be a binding principle, not a slogan.** That requires transport investment, parking restraint, street design, enforcement and monitoring.

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

Answer: Very unclear

We find the proposed planning policy very unclear in several important respects.

The policy gives significant weight to **assumed** new town benefits before those benefits have been evidenced. It also risks safeguarding land and restricting other proposals before boundaries, infrastructure requirements, delivery assumptions and local impacts have been properly tested.

It is not clear how the policy interacts with the evidence base. **The policy appears to support new town proposals before the evidence has demonstrated whether a specific location is suitable, deliverable or sustainable.**

It is not clear how the policy protects against premature policy lock-in. Once land is identified, safeguarded or given special weight in decision-making, it becomes much harder for the public to challenge the principle of development, even if the evidence later shows major problems.

The policy does not make clear how the 10,000+ homes threshold should be applied. **It does not explain whether separate places can simply be joined together to meet the threshold.** This is highly relevant to Crews Hill and Chase Park. They appear to have been combined to meet the programme threshold, not because they form a coherent single place.

The policy **does not make clear how brownfield-first will be applied.** If large areas of greenfield land can be advanced without a proper brownfield alternatives test, then brownfield-first risks becoming a slogan rather than a policy principle.

The policy **does not clearly distinguish between claimed benefits and evidenced benefits.** Housing numbers, economic benefits, transport improvements, and sustainability claims should not be assumed. They should be demonstrated.

The policy does not provide enough clarity on the relationship between national decision-making, local planning processes, development corporations, local authorities and communities.

It is **not clear how environmental limits will be applied.** For example, where a proposed new town would affect SINCs, public rights of way, productive land, landscape character, water resources or transport networks, the policy should explain what tests must be passed before support is given.

The policy needs clearer safeguards. It should state that no new town location should be progressed unless evidence has been published, reasonable alternatives tested, infrastructure requirements costed, environmental constraints mapped, and affected communities properly engaged.

It should also state that locations should not be artificially combined simply to meet the New Towns Programme threshold unless there is clear evidence that they can function as a coherent place.

The planning route, housing numbers and delivery timetable are very unclear

The draft New Towns Planning Policy does not explain clearly how a New Town at Crews Hill and Chase Park would actually move from broad location to planning status, masterplanning and delivery.

The draft policy appears to assume that New Towns will be taken forward through the development plan system. It says New Towns will contribute towards meeting the identified housing need of relevant strategic and local planning authorities. It also says development plans should identify New Town locations, intended scale and known boundaries, set out the policies applying to New Town allocations, identify the infrastructure necessary to support them, and be consistent with any town-wide framework masterplan and design code. **That raises several issues.**

First, Enfield is only now completing a Local Plan to replace its 2010 plan. If Crews Hill and Chase Park are to be treated as a New Town, the draft policy does not explain whether the current Local Plan would need to be paused, modified, reopened or reviewed almost immediately after adoption. A properly evidenced New Town allocation would require boundaries, housing numbers, infrastructure planning, transport evidence, environmental assessment, viability work, a masterplan, design code, public consultation, examination and adoption. That cannot simply be bolted onto a plan which is already at examination stage.

Second, this creates a serious timing problem. **If the policy expects New Towns to be identified in development plans and supported by masterplans and design codes, it is difficult to understand how there could be “spades in the ground” in this Parliament** at Crews Hill and Chase Park without compressing or bypassing the normal plan-led process. The draft policy should explain the intended legal and procedural route.

Third, the policy **does not explain how the housing numbers would be counted.** In London, housing requirements are set through the London Plan. Furthermore, if New Town homes are counted towards Enfield's housing requirement or housing land supply, this could directly undermine brownfield-first delivery by reducing pressure to bring forward more difficult urban, town centre, estate renewal, public land and regeneration sites. A large greenfield or Green Belt allocation could make the borough's housing supply position look easier on paper while weakening the incentive to solve existing brownfield delivery failures.

Fourth, **the relationship between the Government, the Mayor of London, Enfield Council and any development corporation or other delivery body is unclear.** The draft policy does not explain whether the New Town would be planned through the London Plan, the Enfield Local Plan, a development corporation plan, or some hybrid arrangement. Nor does it explain who would decide the boundary, who would prepare and consult on the masterplan, who would test the evidence, who would grant permissions, and whose housing requirement the homes would count towards.

The draft policy should therefore be amended to make clear how New Towns in London would interact with the London Plan, local plans, any development corporation or other delivery body, housing requirements, masterplanning, design coding and further public consultation. Without that clarity, the policy risks creating uncertainty, confusion and delay rather than a clear plan-led route to delivery.

The draft policy also creates uncertainty about the status of any town-wide framework masterplan. It **appears to allow a masterplan and design code to be prepared before a development plan allocation.** However, a masterplan prepared outside the development plan process should not be allowed to pre-determine the principle, boundary, scale, or infrastructure requirements of a New Town. Those issues must be tested through the statutory planning process, not settled in advance through a non-statutory masterplan.

Q17. Do you think establishing placemaking principles in the proposed planning policy is an effective way to implement the placemaking ambition of the programme?

Answer: No

Placemaking principles are useful, but only if they are specific, enforceable, and linked to funding, governance and delivery.

A principle saying that new towns should provide jobs, green space, public transport, and community infrastructure does not show that those things will be delivered, when they will be delivered, who will pay for them, or what happens if they are delayed.

Broad principles are not enough. Many poor developments have been promoted using positive language about sustainability, walkability, green space, community, and design quality. The problem is not the absence of good words. **The problem is that those words are often not binding when difficult decisions arise.**

There is also a more basic problem with the principles themselves. **They appear to have been accepted without enough scrutiny of whether they are clear, complete, or capable of being enforced.** In several places the language is too weak. Principles which say new towns “should” provide particular outcomes are not enough for proposals of this scale and impact. Where the issue is fundamental to whether a new town is acceptable, the policy should use mandatory “must” language. Public transport, early infrastructure, protection of existing assets, stewardship, green infrastructure, employment protection, and community facilities should not be aspirations. They must be mandatory requirements.

The principles must also deal with net impacts. It is not enough to say that a new town should provide jobs, green space, biodiversity, public access or community facilities. The policy must ask what is being lost, what is being gained, and whether the result is genuinely positive overall. If 1,000 existing jobs are lost and 100 new jobs are created, that should not be described as an economic benefit. If 25 hectares of existing accessible open space, sports land or countryside access are lost and replaced with 5 hectares of new park, that should not be described as a green space benefit. The same test should apply to biodiversity, public rights of way, productive land, sports facilities, social infrastructure, and local businesses.

The principles should therefore require a clear net impact account for each new town. That account should identify existing assets, likely losses, proposed gains, timing, quality, accessibility, ownership, management, and long-term funding. It should also distinguish between benefits that are genuinely additional and benefits that merely replace, repackage or relocate what already exists.

There is also **no clear explanation of how the placemaking principles will be implemented, monitored or enforced** over the lifetime of a new town. A principle is not effective if it can be diluted through later masterplanning, viability claims, phasing decisions, or delivery pressures. The policy should require measurable outcomes, published monitoring, independent review and consequences where commitments are not met.

This is particularly important for transport. **Some principles appear to apply “from the outset,” but transport is not treated with the same force. That is a serious weakness.** In a location such as Crews Hill and Chase Park, public transport, walking, cycling, parking restraint, and mode-share

targets need to be embedded from the start, before car dependency behaviour becomes locked in. Transport cannot be left as a later mitigation issue.

Placemaking should also start from what is already there. It should not begin with a blank-sheet masterplan. For Crews Hill and Chase Park, that means identifying existing assets first, including businesses, jobs, horticulture, garden centres, sports and recreation uses, public rights of way, mature trees, ecological networks, landscape character, public open space and access to countryside. The planning policy should require those assets to be identified, protected, incorporated and enhanced wherever possible, not treated as obstacles to be removed or losses to be mitigated later.

For Crews Hill and Chase Park, placemaking principles must answer a more fundamental question: is this really one place? If the answer is no, then the placemaking strategy should not pretend otherwise. Crews Hill and Chase Park should be assessed and planned separately, as they have been in the Local Plan process. Joining them together to meet a housing threshold does not create a shared identity, a shared centre, a shared transport hub or a shared daily life.

If the Government intends to treat the two places as one new town, the **planning policy should require evidence showing how the combined area would function as one place.** That evidence should explain where the town centre would be, how the station and transport hub would work, how public transport would be funded and delivered before car dependency becomes embedded, which existing businesses would be protected, which public rights of way would be retained, which ecological assets would be treated as non-negotiable, how much Social Rent would be delivered on public land, and how long-term stewardship would be funded.

The House of Lords Built Environment Committee was right to emphasise that placemaking should be people-centred, nature-rich, and locally distinctive, and that new towns must avoid homogeneity. The planning policy should therefore require each new town to produce a binding placemaking framework before the principle of large-scale development is accepted. That framework should be co-produced with communities, based on published evidence, independently reviewed and linked to enforceable delivery triggers.

Without that, the placemaking principles risk becoming decorative rather than decisive i.e. positive words which help justify selection, but do not actually meaningfully control what is built, what is lost, when infrastructure arrives, or whether the final outcome is genuinely better than what existed before.

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

Answer: No

Some flexibility is needed for a multi-decade programme. However, too much flexibility can weaken public protections and allow important commitments to be diluted later.

Flexibility should not become a way to defer hard decisions. For Crews Hill and Chase Park, it must be bounded by clear environmental constraints, infrastructure triggers, business protection requirements, public transport commitments, and a brownfield-first test.

The policy should distinguish between flexibility over detailed design and flexibility over core public interest commitments. It may be reasonable for detailed layouts, architectural approaches, and phasing to evolve over time. It is not acceptable for key principles to be left flexible where they determine whether the new town is sustainable or fair.

For Crews Hill and Chase Park, the following should not be treated as optional:

- whether Crews Hill and Chase Park are 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 take;
- 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 right approach is principles-led flexibility. 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

The 40% affordable housing target should not be treated as a secure benefit unless viability, grant requirements, tenure mix, delivery phasing, and Social Rent outputs are published. **A headline percentage is not enough.** The consultation should show how many Social Rent homes would be delivered, when, with what funding, and under what delivery model.

A 40% affordable housing target is not, by itself, an effective way of delivering an ambitious number of affordable homes. **If it relies on a conventional cross-subsidy model, it risks slowing delivery and failing the households most in need.**

The target **does not distinguish clearly enough between affordable housing in general and Social Rent in particular.** This matters because Social Rent is the tenure most needed by households in acute housing need, including many households in temporary accommodation.

A 40% target **can easily become a ceiling rather than a floor.** Once 40% is presented as the programme benchmark, there is a risk that higher levels of affordable housing, especially on public land, are not properly tested.

Even **that 40% target may not be secure.** If land, infrastructure, or abnormal costs are high, viability arguments could later be used to reduce affordable housing provision unless tenure mix, grant assumptions and delivery mechanisms are fixed from the start.

The target appears to imply a conventional cross-subsidy model, where affordable housing is funded by the sale of market homes. **That model is a serious weakness for a new town of this scale.** It means **delivery becomes dependent on private sales rates, market absorption, house prices, mortgage conditions, and developer risk appetite.** If the market slows, delivery slows. If sales values fall, affordable housing is squeezed. If infrastructure costs rise, viability arguments return.

This is not a theoretical concern. **Cross-subsidy has repeatedly failed to deliver the scale and speed of genuinely affordable housing needed.** It produces long delivery timescales, uncertain affordable housing outputs, and constant pressure to renegotiate public benefit.

A new town at Crews Hill and Chase Park could introduce a very large volume of market housing into the same housing market area as Enfield's brownfield sites. That raises a further risk: the new town may not be additional. It may compete with brownfield sites for buyers, investment, labour, grant, and delivery capacity. If so, **the 40% target would not simply add affordable homes. It could displace or delay affordable housing that might otherwise be delivered through brownfield regeneration.**

The programme should be **honest about timing.** A new town may take decades before it delivers homes at scale. It **should not be presented as a short-term solution to Enfield's homelessness crisis unless the delivery pathway, tenure mix and timescales are clearly evidenced.**

At Crews Hill and Chase Park, a significant amount of land is understood to be publicly owned. That changes the test. **Public land should not be used to support a speculative, sales-led model that is vulnerable to absorption rates and viability claims. Public land should be used for publicly led housing delivery, with Social Rent at the heart of the programme.**

Better Homes Enfield's position is that **public land should deliver public homes**. On publicly owned land, the default should be 100% genuinely affordable housing, with a major Social Rent programme delivered through public, community-led or non-profit models. Anything less would fail to make proper use of public land to meet acute housing need.

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

Answer: No

The policy is not clear because it **gives substantial weight to social and economic benefits before those benefits have been properly evidenced**. For Crews Hill and Chase Park, the claimed benefits include housing, affordability, economic growth, infrastructure and jobs. But the proposal does not establish what is genuinely additional, what would happen anyway, what existing jobs may be lost, what infrastructure is funded, or when benefits would arrive. Substantial weight should not be given to unevidenced or speculative benefits.

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 Crews Hill and Chase Park, the claimed benefits need to be tested carefully. It is not enough to refer to headline housing numbers. The Government should show how many homes would be genuinely affordable, how many would be Social Rent, when they would be delivered, who they would serve, and how they would meet London and Enfield's housing needs.

Likewise, economic benefits should not be claimed without accounting for existing jobs and businesses that may be lost. Crews Hill already contains horticultural, retail, rural, leisure and other businesses. **A proposal that destroys existing livelihoods should not be given substantial economic weight unless it has properly assessed those losses and shown how they will be avoided.**

Temporary construction jobs should also be distinguished from permanent local employment. They **should not be treated as compensation** for the loss of established businesses, horticultural employment, recreation jobs or land-based work unless local access, duration, skills, pay, and replacement value are evidenced.

Transport benefits should also be evidenced, not assumed. A new town that becomes car-dependent would create social, environmental and economic costs, including congestion, air pollution, road danger, pressure for road widening and reduced quality of life.

The policy should therefore say that substantial weight can only be given to social and economic benefits where those benefits are specific, net additional, evidenced, deliverable and secured. Claimed benefits should not outweigh environmental harm or Green Belt harm unless they have been properly tested.

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

Answer: No

The Green Belt approach should require a clear comparison between the additional benefits and additional harms of each option. For Crews Hill and Chase Park, **the relevant question is whether the proposal delivers enough additional homes above the Local Plan baseline to justify landscape harm, ecological harm, infrastructure cost, business displacement, job losses, and delivery risk.**

The Government's approach needs to be strengthened to include a clear brownfield-first test, a proper assessment of Green Belt purposes, a realistic alternatives test, and stronger safeguards.

Before large-scale greenfield release is supported, **the decision-maker should consider whether housing need can be met through a less harmful combination of brownfield delivery, estate renewal, stalled-site intervention, town-centre intensification, better use of underused urban land, and smaller Green Belt infill or edge-of-settlement sites.** The consultation does not show that such local alternatives have been tested.

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 and within existing urban areas first. The SEA's own land-cover assessment reinforces this concern.

That matters because the Government cannot credibly claim to be applying a brownfield-first approach while selecting a substantially greenfield location without first publishing a clear comparison with less harmful alternatives in London and Enfield, including brownfield new town locations, under-used industrial land, stalled sites, and town-centre intensification.

At Crews Hill and Chase Park, **the proposal is in direct tension with brownfield-first policy.** The Council's Local Plan identifies more than 700 brownfield sites with capacity for around 30,000 homes. Releasing large areas of greenfield land risks undermining that pipeline.

The Government should be careful about use of terms such as "poor quality Green Belt" or "grey belt." Land should not be described in this way without a transparent assessment against Green Belt purposes and environmental constraints. At Crews Hill and Chase Park, much of the land is greenfield, and some areas have ecological, landscape, public access, food-growing and historic value.

The policy should therefore require:

- a published Green Belt purposes assessment;
- a brownfield alternatives assessment;
- a grey belt assessment with clear mapping;
- an additionality assessment showing what extra homes and public benefits would be delivered above the Local Plan baseline;
- a full assessment of ecological, landscape and public access value;
- a public interest test before any release;
- a requirement to minimise land take.

Greenfield land 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

The consultation does not appear to propose an explicit safeguarding policy. It asks whether the proposed planning policy is sufficient for safeguarding land but does not identify what would be safeguarded, from what forms of development, for how long, by whom, or through what legal or planning mechanism. That absence makes the question very difficult to answer. Consultees are being asked to judge the adequacy of a safeguarding approach that has not been clearly set out.

In general terms, **land should not be safeguarded for a new town before the evidence has been published and tested.** Safeguarding is not a neutral act. It can affect expectations, investment decisions, business confidence, public trust, and the planning context. It could also prejudice brownfield delivery and local planning choices before the case for the new town has been made.

At Crews Hill and Chase Park, safeguarding would be especially problematic because the evidence base is incomplete and contested. The Government has not published the full options appraisal, infrastructure assumptions, transport strategy, environmental baseline, land ownership strategy, brownfield alternatives assessment or delivery plan. Nor has it published a clear explanation for why Crews Hill and Chase Park should be safeguarded as one new town location, rather than considered separately as two different growth areas.

Safeguarding should therefore not happen unless:

- the full evidence base has been published;
- reasonable alternatives have been assessed;
- Crews Hill and Chase Park have been assessed separately;
- the rationale for combining the two areas has been published;
- the boundary, land parcels and capacity assumptions have been explained;
- environmental constraints have been mapped;
- infrastructure requirements have been costed;
- public transport feasibility has been demonstrated;
- affected businesses and residents have been engaged;
- the impact on brownfield delivery has been assessed;
- governance and land value capture arrangements have been clarified.

Without those safeguards, land safeguarding risks becoming a way of creating policy momentum before proof.

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

Answer: Yes

Additional policies are needed before any location is taken forward. These should include a brownfield-first test, a net additionality test, a “no infrastructure, no occupation” rule, an employment retention and relocation policy, a public land and Social Rent policy, a biodiversity and mature tree protection policy, a land-use carbon policy, and a requirement for independent community engagement before boundaries are fixed.

1. There should be a **brownfield-first policy test**. No greenfield new town should proceed unless the Government has published an assessment of brownfield alternatives and the impact on brownfield delivery in the host borough and wider housing market area.
2. There should be an **additionality and substitution test**. Before any new town location is supported, the Government should publish evidence showing whether the proposed new town would add to housing delivery or substitute for brownfield delivery. This should include realistic assumptions on demand, sales rates, absorption rates, construction capacity, grant funding, public sector capacity, and infrastructure phasing. It should compare brownfield-led, new town-led and combined delivery scenarios over 5, 10, 15, 20 and 30 years.
3. There should be a **coherence test** for locations made up of more than one place. The Government should not allow separate locations to be joined together simply to reach the 10,000+ homes threshold. Where a proposed new town combines separate areas, the policy should require evidence of a viable shared centre, transport spine, civic identity, and functional relationship.
4. There should be a **no infrastructure, no occupation policy**. Occupation should not take place until essential transport, water, wastewater, drainage, schools, health, community, and green infrastructure is funded and delivered.
5. There should be a **Social Rent and public land policy**. Where public land is used, the default should be genuinely affordable housing at much higher levels than 40%, with a clear minimum Social Rent requirement.
6. There should be a **transport credibility test**. New towns should be required to show how low-car living will be delivered, funded, enforced, and monitored from the start.
7. There should be a **nature and public access protection policy**. SINCs, irreplaceable habitats, veteran and mature trees, hedgerows, ecological corridors, existing parks, and public rights of way should shape the masterplan from the outset.
8. There should be a **land-use carbon policy**. Whole life carbon assessments should be supplemented by a land-use carbon account that measures soil carbon, biomass carbon, and lost sequestration from greenfield development.
9. There should be an **employment protection policy**. New towns should be required to assess existing employment, protect viable businesses wherever possible, and provide funded relocation, compensation and replacement employment where displacement cannot be avoided.

10. There should be a **transparency policy**. Key evidence, assumptions, options appraisals, and infrastructure plans should be published well before decisions are taken.
11. There should be an **independent engagement and planning advocacy policy**, so residents and businesses can participate effectively in a highly technical process.
12. There should be a **long-term stewardship policy**, with funded arrangements for parks, public realm, SuDS, community assets, and green infrastructure.

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

Answer: Yes.

The New Towns Draft Programme could have significant impacts on people and groups with protected characteristics. These impacts need to be assessed in more detail before any location is advanced.

Disabled people could be affected if public transport, streets, homes, parks, and community facilities are not designed inclusively from the outset. At Crews Hill, the existing station is not currently a sufficient basis for an inclusive low-car settlement unless step-free access and accessible interchange are secured. Inclusive design must not be left to later phases.

Older people could be affected if the location becomes car-dependent, if walking routes are steep or poorly connected, if health services are delayed, or if accessible housing is not provided early. The House of Lords Built Environment Committee recommended that new towns should support the needs of an ageing population and include age-appropriate housing.

Children and young people could be affected if schools, play space, youth facilities, safe walking and cycling routes and access to nature are not delivered early. They should be involved in engagement from the start.

Women and girls could be affected by poor public realm design, isolated routes, inadequate lighting, unsafe walking and cycling connections or poor access to public transport.

Low-income households, including many households in temporary accommodation, could be affected if the programme promises affordability but delivers mainly market housing or intermediate products they cannot afford. A clear Social Rent delivery plan is essential.

Existing workers and small business owners may also be affected, including people whose livelihoods depend on businesses at Crews Hill and Chase Park. Equality assessment should include the impact on employment, income security, and displacement.

The programme should therefore include a full equality impact assessment for each location, based on evidence and engagement with affected groups.

The equality assessment should also consider timing. If disruption, job loss, rent pressure or pressure on services occurs early, but affordable housing and infrastructure arrive much later, the impacts will not be evenly shared. Lower-income households and workers in insecure employment may bear risks long before any benefits are delivered.

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?

Answer: Yes.

We ask MHCLG to treat the introductory section of this document (section 2.1-2.3, including all sub-sections 2.3a – 2.3l) as part of our formal response to Q25. This is because it sets out important cross-cutting objections which apply across the questionnaire, including the adequacy of the SEA, the lack of published evidence, the failure to test alternatives, the joining together of Crews Hill and Chase Park, and the risk of policy lock-in before the case has been made.

Better Homes Enfield's central concerns are that (a) the public is being asked to comment on a proposal without the evidence needed to judge it and (b) the Government will make its decision based on inaccurate information and an unreliable SEA.

A new town of up to 21,000 homes across around 884 hectares would be one of the most significant changes to Enfield for generations. It would affect homes, jobs, transport, public services, plans for urban regeneration and investment, 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 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 consultation **does not provide a clear comparison with realistic alternatives.** The choice is not between a new town at Crews Hill and Chase Park, doing nothing or other new town sites. The realistic alternative is a brownfield-led housing delivery strategy, with direct intervention to unlock stalled sites and, where properly justified, smaller and less harmful Green Belt infill or edge-of-settlement release. That alternative may deliver homes faster, with less infrastructure risk and less environmental harm than a very large greenfield new town. It should have been assessed openly and for each location.

Before Crews Hill and Chase Park is taken forward, the Government should publish:

- the **Enfield submission or proposal evidence relied on by the New Towns Taskforce, MHCLG or the New Towns Unit, with only genuinely necessary redactions;**
- the **assessment of Crews Hill and Chase Park against each relevant part of the Locations Methodology;**
- the **significant barriers to delivery** identified by Enfield or any other promoter and the **measures proposed to overcome those barriers;**

- the **infrastructure assumptions** relied on;
- the **funding, leadership, and governance structure proposed**;
- the **business-as-usual reference case used to judge net additionality**;
- the **evidence showing what additional homes, faster delivery, higher affordability, or higher quality would be achieved** because of New Town designation;
- the **evidence showing that the planned number of homes can be delivered without unreasonable spatial or other constraints**;
- the evidence that the location would **not be overly reliant on car travel**;
- any **MHCLG assessment, scoring or judgement of whether Enfield's evidence was sufficient**;
- the **reasons why Enfield's Local Plan evidence, which treated Crews Hill and Chase Park separately and at a lower scale, was not considered determinative**.
- a **realistic alternatives assessment at a localised level**, including brownfield-led delivery, brownfield plus smaller Green Belt infill, Crews Hill alone, Chase Park alone, and the combined proposal;
- the **evidence explaining why Crews Hill and Chase Park have been combined**, including whether either location was assessed separately, whether either would meet the programme threshold on its own, and how the combined area would function as one coherent new town;
- the **boundary, land parcels, and capacity assumptions** behind the claimed 21,000 homes;
- the **infrastructure, phasing, and delivery assumptions**;
- the **transport evidence**;
- the **Green Belt and grey belt assessment**;
- the **ecology, landscape, water, wastewater, and drainage evidence**;
- the **noise evidence**, including existing road, rail and aircraft noise and the implications for homes, schools, parks, play space and outdoor amenity;
- the **carbon assessment**, including whole life carbon, land-use change, soil carbon, vegetation carbon, and the loss of future carbon sequestration;
- the **assessment of existing businesses and jobs**;
- the **public land and land value capture strategy**;
- the **expected housing mix, including Social Rent**;
- the **governance proposal**.

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.

The consultation should also be reviewed against public law consultation principles. A fair consultation should give people enough information to respond intelligently, should take place before outcomes are effectively fixed, and should allow decision-makers to conscientiously consider the evidence received. If key evidence is withheld, alternatives are not properly explained, and respondents cannot clearly submit supporting evidence, the process risks falling short of that standard.

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

Better Homes Enfield supports genuinely affordable, safe, and sustainable homes. But ambition is not a substitute for evidence. Crews Hill and Chase Park should not be taken forward until the evidence is published, alternatives are tested, and the case for development at this scale is made openly.