



Gillian Donald  
Planning and Building Control  
St. Albans City and District Council  
Civic Centre, St. Peter's Street  
St. Albans  
Herts AL1 3JE

Our Ref:

Your Ref:

5<sup>th</sup> January 2024 (by email)

Dear Gillian Donald,

**Application no. 5/2023/2112**  
**Centurion Club, Hemel Hempstead Road, Leverstock Green HP3 8LA**  
**Provision of 10 additional holes to the existing 18-hole golf course**

I write with regard to the above application to which CPRE Hertfordshire objects strongly for the following reasons.

1. The land identified for this proposed development is designated as London Metropolitan Green Belt in the adopted St Albans District Plan Review where development generally is seen as inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF). The NPPF also identifies that development may be "not inappropriate" if certain criteria are satisfied (NPPF para 150 seq.)
2. The Planning Statement accompanying the application itself notes that "not inappropriate" development should "preserve its (Green Belt) openness and ... not conflict with the purposes of including land within it" (op cit). CPRE Hertfordshire believes that the magnitude and nature of the works proposed constitute a very significant change in the nature and character of the Green Belt in this area, notwithstanding the proposed use as a golf course.
3. Similarly, the proposal cannot be seen as "small-scale facilities for participatory sport and recreation" within the requirements of St Albans District Plan Review Policy 1 – Metropolitan Green Belt. Policy 91 – Location of Leisure Facilities, which is quoted as permitting golf course use in the Green Belt. We believe that the definitions cited in the NPPF regarding "not inappropriate" development do not prevent relevant and appropriate planning concerns from being considered.
4. We would suggest strongly that the present proposals comprise a very considerable change to the character of the Green Belt in this location such that the definitions and



exemptions quoted by the Applicant do not apply in this case. They should not be regarded as providing an overall justification for a potentially highly damaging development, and it is not credible to suggest that the removal of the well-established and densely wooded plantation (Potters Crouch Plantation) in favour of golf holes, however well landscaped, is not a very significant alteration to the landscape character, environmental conditions or biodiversity of the area.

5. The Potters Crouch Plantation significantly pre-dates the development of the golf course and provides an important and highly valued landscape resource for local communities and visitors. Public Right of Way (PRoW) 13 forms part of the southern boundary of the Plantation and then crosses the golf course and PRoWs 14 and 55 run immediately north to south to the west of the Plantation, affording an attractive and well used footpath for residents and visitors alike.
6. The provisions of Paragraph 149 of the NPPF, quoted by the Applicant, relate to “new buildings” providing “appropriate facilities for “outdoor sport, outdoor recreation”. This does not, in our view, provide justification for a wholly new land use which will change the nature of the area and remove a significant countryside feature in an area under huge pressure for development.
7. The Applicant asserts that the new provision of golf holes is needed to improve the golf course and reduce pressure on the existing facilities. CPRE Hertfordshire is however aware of the preliminary promotion by Inspired Villages on behalf of Centurion Golf Club of a “village” and “community hub/village centre” immediately south of Hemel Hempstead Road which would utilise land presently used for golf holes adjacent to the present club-house which would be re-located.
8. The active promotion of these proposals suggest that the Golf Club is considering further inappropriate residential and commercial development in the Green Belt. Implementation of these proposals, which are still subject to the determination of planning applications which would presumably follow any consents granted on the present application, would then reduce the golf course provision to its present number of holes, albeit in different locations.
9. Further significant concerns relate to the environmental issues related to the proposed development, including the major earth movements necessary and the removal of parts of the Potters Crouch Plantation. The proposals for land remodelling will form small lakes, fairways and bunkers which will become part of the golf course and alter the character and accessibility of the area which will also be impacted by ten tonne truck movements for an unspecified time period.



10. Awareness of the biodiversity and wildlife impacts of development is increasing and recent legislation, such as the Environment Acts and Levelling Up and Regeneration Act, will place increasing requirements on developers with regard to biodiversity net gain and wildlife protection and enhancement. Potters Crouch Plantation is a mature area of diverse natural habitats which have developed over many years and a Local Wildlife Site.
11. The ecological evaluation provided by the Applicant seeks to diminish this and the presence of priority species and habitats, including a number of birds and bats. Although the historical analysis clearly shows much of the site being unwooded in the 19<sup>th</sup> century, there are remnants of ancient woodland around the edges which are priority habitats (as indicated by the species present which include bluebell) and should be protected.
12. Notwithstanding the presence of conifer plantation which is suggested to be relatively low value, all woodland is valuable, especially of this size and its ecological integrity relies on connectivity and lack of disturbance, both of which would be lost. The problem of windthrow, where the removal of trees grown in a woodland or plantation expose the remainder to wind damage, will be seriously exacerbated by the proposals for holes with long fairways cutting through the woodland.
13. New replacement woodland takes a very long time to establish anything approaching the ecological value of the existing, and the proposed layout of the new holes would impact on the woodland proposed to be retained. Older trees might be considered hazardous and felled or heavily pruned, losing much of their value and movement of woodland species around the site will be impaired.
14. It is increasingly realised that the existing mechanistic calculation of actual and potential habitat provision on specific sites is an inadequate means of reflecting the diversity of mature ecosystems such as exists in Potters Crouch Plantation. The unique and generally irreplaceable nature of each location should be recognised and this should be weighted significantly in the planning decision.
15. CPRE Hertfordshire is particularly concerned at the advice received from the Council's Tree Officer who appeared not to have made a site visit at the time of the report which failed to mention that it is part of a Local Wildlife Site designated for its ancient semi-natural woodland remnants and significant number of ancient woodland indicator species, including bluebell. The report also fails to reference the Ecological Appraisal (para 3.3.1) which considers it likely that part of the proposal site is a priority habitat and as such protected by the NPPF.

16. The Council's tree report also fails to note that felling a large area of interior woodland would create numerous long edges exposed to the force of the wind, potentially causing substantial windthrow in the woodland areas meant to be retained. The report notes that the trees to be felled would not be seen from outside the site.
17. Breaking up a woodland area into strips between open land will have a significant impact on the woodland species present. We do not understand the reference to the plantation being "heavily managed and manicured" as essential forestry practice includes thinning, and the maintenance of rides which are essential for access and often with good edge habitats supporting a wide range of biodiversity.
18. The woodland includes veteran trees, remnant areas of coppiced woodland with bluebells in the ground vegetation and significant coppice stools and remnants of laid hedgerows. The Ecological Appraisal states that the veteran trees will be retained (as required by the NPPF) and that the semi-natural woodland and beech plantation will be "retained as far as possible". Retaining veteran trees does not guarantee the survival of their ecological importance especially if the surrounding woodland is changed or felled.
19. Other environmental concerns relate to the presence of bats using the site, as well as a number of Section 41 priority species of birds. The loss of a considerable amount of woodland will impact on carbon storage and the proposals will use additional water in an area where there is a considerable reliance on an aquifer that also supports chalk streams and any additional demands on such scarce water resources should be considered very carefully.
20. The loss of over 14 hectares of woodland and conversion to mown grass (not "woodland glade" as described by the Applicant) is a significant loss of woodland cover and amenity for local residents. The statement in the Applicant's Landscape Visual Impact Analysis that this has no visual impact is also inaccurate and views from surrounding elevated land includes a popular visitor destination with a growing community interest project ([sergehillproject.co.uk](http://sergehillproject.co.uk)) which will be significantly impacted.
21. We request the Council to investigate the full extent of the Applicant's aspirations for the golf club site. Future intentions with regard to residential development on the golf course should affect significantly decisions on the present proposals, particularly with regard to their justification on the grounds of further provision for outdoor sport.
22. It is apparent that there is very extensive opposition to this proposal from the local community and a considerable range of organisations and individuals expressing their deep concerns, which CPRE Hertfordshire supports fully. We oppose strongly this



proposal and urge the Council to refuse permission for this unnecessary and damaging development in designated protected countryside.

Yours sincerely,

Chris Berry  
Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.