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NGO Joint Statement

Center Parcs proposals would result in unacceptable loss of historic ancient woodland in Sussex

National charities, environmental experts and Sussex conservation groups are alarmed by the potentially devastating impact of Center Parcs' new proposals within part of the ancient Worth Forest, and are asking the company to think again.

South of Crawley in Sussex is a landscape of ancient woodland that makes up the historic Worth Forest; previously a medieval hunting forest that now forms part of the High Weald Area of Outstanding Natural Beauty (AONB). The area adjoins a Site of Special Scientific Interest and is part of a Biodiversity Opportunity Area that links habitat across Horsham to Mid Sussex and on into Wealden District. The large blocks of ancient woodland that remain include Cowdray Forest, Tilgate Forest, Brantridge Forest, High Beeches Forest, Worth Forest and Oldhouse Warren, among others.

Nature conservation and countryside charities the Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, Sussex Ornithological Society and RSPB say that the last of those, Oldhouse Warren, now faces a grave threat from Center Parcs' proposals to build its sixth UK site on this 550 acre ancient woodland. Center Parcs' scheme would tear the heart out of Oldhouse Warren's irreplaceable ancient woodland and this very special part of the High Weald AONB, resulting in irreversible loss of habitat for wildlife. It puts to the test the effectiveness of planning policy that gives ancient woods and AONBs exceptional protection from damage and destruction. The inevitable loss of habitat would make a mockery of the Government's commitments to address climate change and its manifesto pledge to expand the acreage of protected landscapes and to plant 30,000 ha of new trees by 2024. To consider the destruction of such valuable woodland habitat when the UK has just hosted the UN Climate Change Conference (COP26) and committed to end deforestation is unquestionably troubling and steeped in irony.

Although the proposed Center Parcs site is not open to the public, it is known from authorised survey work that it is a breeding and foraging site for numerous bird species; some of these are so scarce that they are monitored by the national Rare Breeding Birds Panel (RBBP), are Red-listed species of High Conservation Concern, or are Schedule 1 Species under the Wildlife and Countryside Act. These include Goshawk, Marsh Tit and Firecrest, with further surveys likely to reveal other red-listed birds.

It is also a medieval hunting forest with known historical and archaeological features, such as pillow mounds (artificial rabbit warrens) and pond bays associated with the iron industry. As an area that has not been cultivated for at least 600 years it is likely to have many other heritage features that are as yet undiscovered.

Center Parcs' proposals are likely to include around 900 lodges, a tropical swimming centre, recreational facilities, shops, restaurants, car parks, roads and other associated infrastructure, spread over the equivalent of approximately 350 football pitches. Any plans to build on this site would result in significant direct loss of ancient woodland, as well as severe deterioration from increased disturbance; impacts that are contrary to national protections afforded to irreplaceable ancient woods.

The charities are calling on Center Parcs to rethink their plans and identify an alternative sustainable site that would not result in the loss of irreplaceable habitats. Development at Oldhouse Warren would be simply unacceptable. Habitats as precious as this site are protected and must remain protected and every effort should be made to enhance this part of Worth Forest in line with important commitments by Government to ensure nature's recovery. Other nearby areas of ancient woodland, such as Tilgate Forest, are undergoing restoration work with lottery and Government funding. There could be a similar opportunity to restore the ancient woodland habitats at Oldhouse Warren.

If Center Parcs wishes to locate a new facility in this part of the country, they should find a more sustainable site where they could help to address the climate and biodiversity emergencies by planting new woodland, or allowing it to regenerate naturally to provide the woodland context for their leisure facilities. This would produce a much more positive outcome all round that is in keeping with Center Parcs' avowed commitment to operate in a sustainable and ethical way that avoids destroying existing irreplaceable habitats at Oldhouse Warren.

What can supporters do?

The charities are urging local people to contact their local councillors, MP and Center Parcs to highlight their concerns and express the following:

1. This ancient woodland site within the High Weald AONB is far too sensitive a location for Center Parcs to be building a new holiday park, which would cause large-scale, serious and irretrievable damage to its ecology. Center Parcs must find an alternative location in the South East where the benefits of their park can be enjoyed without harm to diverse woodland ecosystems.
2. Government commitments to cutting carbon emissions, enlarging areas of special biodiversity and protecting special landscapes and habitats are incompatible with allowing a large swathe of Worth Forest to be cut down for a huge private leisure facility.
3. The economic and social benefits of the park would not be affected by its relocation and therefore there are no exceptional circumstances for developing on this site. If development is allowed here of all places, where else in Sussex would be safe from the bulldozers?
4. It is vital that local councillors and MPs stand up for the protection of this historic wooded landscape. Instead, the restoration of this ancient woodland habitat must be prioritised.

While there is no current consultation on the proposals or detailed plans to indicate how Center Parcs intends to design its new site within Oldhouse Warren, any development within this ancient woodland site would undoubtedly be highly impactful and intolerable for the wood and its rare wildlife. We urge Center Parcs to reconsider before they invest too far with plans at such an unsuitable site for development.

Quotes

Jenny Scholfield, South East Regional Director, Woodland Trust:

“The Woodland Trust manages more than 1,000 publicly accessible woodlands so we understand the importance of helping people to enjoy the outdoors. But access to nature must avoid harming nature itself. Building hundreds of lodges alongside leisure centres, roads and car parks within ancient woodland is non-negotiable. This development could also open the floodgates for damage to ancient woodlands elsewhere. Put simply, Center Parcs need to find a different location for their site.”

Henri Brocklebank, Director of Conservation Policy & Evidence, Sussex Wildlife Trust:

“The UK is one of the most nature-depleted countries on the planet. With one in seven species at risk of extinction and 58% in decline, nature is undeniably in crisis. At this time of crisis, it is imperative that places that are recognised through national policy as irreplaceable, such as ancient woodlands, are protected and restored, not dug up to make lodges and concrete swimming pools, let alone all the associated infrastructure, such as new road junctions and utilities that will be required. Allowing Center Parcs to create a new site here goes against all the relevant local policies and plans, not least the Government’s own commitment to protect 30% of UK land by 2030. Center Parcs needs to find an alternative location that won’t destroy and degrade ancient habitats.”

Dan Osborn, Chairman, CPRE Sussex (the Sussex countryside charity):

“Center Parcs could not have picked on a more environmentally sensitive and precious place than Oldhouse Warren for their proposed new complex. It is utterly unsustainable there. Felling ancient woodland and displacing some of our rarest birds would be bad enough anywhere, it is even worse done in the heart of the High Weald National Landscape. The proposals fly in the face of everything we are told about the need to reduce our carbon emissions, and run counter to Government objectives for the restoration and expansion of our natural habitats and biodiversity for our, and their, long term health and wellbeing. If the planning system’s response to sustainability is to have any credibility here, any future application to build on Oldhouse Warren must surely be turned down, and Center Parcs asked to find another less sensitive location. We cannot keep taking bites out of nature. If we do, nature will bite back; indeed it is already doing so. Let’s not make things worse for the sake of a leisure complex.”

Yianni Andrews, RSPB Area Manager for Sussex, RSPB:

“The proposed site at Oldhouse Warren is home to rare and threatened birds, alongside irreplaceable ancient woodland habitat. It is critical that these special places are safeguarded for now and the future. Not only is this habitat irreplaceable due to its importance for biodiversity and nature’s recovery, but it is also key to tackling the climate emergency by providing carbon storage. Allowing Centre Parcs to develop this site will contravene local and national planning policy, whilst also acting against the UK’s commitment to 30% of land protected by 2030. It is imperative that Centre Parcs avoids Oldhouse Warren in its search for a leisure park; for both nature and people.”

Alan Perry, President, Sussex Ornithological Society (SOS):

“This site is ancient woodland and within an AONB, which means that under planning law it is supposed to be protected. It holds scarce and threatened birds and survey work in this private site would doubtless reveal other such species. But the site also needs to be looked at in a wider context. It is part of a wider, largely undisturbed,

area of woodland and open fields that is home to scarce breeding birds that roam over large distances. Such extensive areas are extremely scarce in the South of England, which makes it all the more important that this site and the wider area around it remains protected from major development.”

ENDS

For more information please contact

Woodland Trust: Jack Taylor E: jacktaylor@woodlandtrust.org.uk P: 07791 559347

Sussex Wildlife Trust: Jess Price E: jessprice@sussexwt.org.uk P: 01273 497511

CPRE Sussex: Michael Brown or Dan Osborn E: info@cpresussex.org.uk

RSPB: Jack Thompson E: SEPlanning@rspb.org.uk

Sussex Ornithological Society: Richard Cowser: conservation@sos.org.uk P: 01903 770259

Notes to editors

1. The information included in this statement relates to the press release issued by Center Parcs in July 2021: <https://press.centerparcs.co.uk/pressreleases/center-parcs-announces-plans-for-sixth-uk-holiday-village-3116311>
2. Further information on Worth Forest and the ancient woodlands that comprise this historic landscape can be found via Mid Sussex District Council’s ‘*Landscape Character Assessment for Mid Sussex*’.

Landscape Character Area 8 – Worth Forest: <https://www.midsussex.gov.uk/media/1767/lca-part-three-landscape-character-areas-worth-forest.pdf>
3. For National Planning Policy Framework environmental protections, including special protections for Areas of Outstanding National Beauty, Ancient Woodlands, SSSIs and biodiversity see (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf), especially chapter 15.
4. Ancient woodland is protected under national planning policy detailed within the Government’s National Planning Policy Framework (NPPF) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf), as well as Mid Sussex District Council’s Local Plan (<https://www.midsussex.gov.uk/media/3406/mid-sussex-district-plan.pdf>). Please see the following documents and relevant paragraphs from these national and local policy documents.

Paragraph 180 of the National Planning Policy Framework:

“When determining planning applications, local planning authorities should apply the following principles:

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons[Footnote 63] and a suitable compensation strategy exists”.

Footnote 63: *“For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.”*

5. The National Planning Policy Framework states that development should be refused in AONB’s “except under exceptional circumstances”. The relevant parts of paragraph 176 and 177 say:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in... ..Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas... ..The scale and extent of development within all these designated areas should be limited...”

“When considering applications for development within... ..Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.”