

Mid Sussex District Council
Planning Department
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

8th May 2026

FAO Katherine Williams

Royal Botanic Gardens Kew (Wakehurst), Wakehurst Place, Selsfield Road, Ardingly, RH17 6TN | Proposed Replacement of Plant

Introduction

Enclosed is an application for planning consent made on behalf of Royal Botanic Gardens, Kew (RBGK), in support of the replacement of the existing Millennium Seed Bank (MSB) refrigeration system for the MSB at Wakehurst in Ardingly, Surrey. The proposed description of development for the planning application is:

“Replacement of the existing refrigeration system with new plant and associated works”

The proposal represents a like-for-like replacement in terms of function, but provides the room for expansion and the removal of the existing redundant system which has reached the end of its operational lifespan.

Application content

This application has been submitted to Mid Sussex District Council (MSDC) via the Planning Portal (ref: PP-14927934). This letter provides the planning justification and context. The following also forms part of the application:

- Application form and Certificate;
- Location Plan (ref. 2084-HDE-XX-DR-M-00007);
- Existing Site Plan (ref. 2084-HDE-XX-DR-M-00008)
- Proposed Site Plan (ref. 2084-HDE-XX-DR-M-00001);
- Existing and Proposed Elevations (ref. 2084-HDE-XX-DR-M-00004);
- Existing Elevations (ref. 2084-HDE-XX-DR-M-00005);
- Existing and Proposed Elevations (ref. 2084-HDE-XX-DR-M-00006);
- Proposed Elevations (ref. 2084-HDE-XX-DR-M-00009)
- Proposed Site Layout (ref. 2084-HDE-XX-DR-M-00010)
- Existing and Proposed Elevations (ref. 2084-HDE-XX-DR-M-00011)
- Flood Risk Assessment
- Noise Impact Assessment
- Sustainability Statement

The relevant application fee of £701 (inc. service charge) has also been submitted via the Planning Portal, based on a site area of 220 sqm.

Site and surroundings

Royal Botanic Gardens, Wakehurst | Wakehurst, which is owned by the National Trust but used and managed by RBGK, is a popular visitor attraction located approximately 2km north of Ardingly, West Sussex, that is open to the public all year around, attracting over 400,000 visitors per annum. Wakehurst is recognised as both a tourist destination and centre of research of international importance, and comprises a famous collection of trees and shrubs. Kew’s mission is “to inspire and deliver science-based plant conservation worldwide, enhancing the quality of life”.

The principal building within the grounds, Wakehurst Mansion, is Grade I listed. The adjacent Stables building is Grade II* listed. The site also provides the location for the Millennium Seed Bank, as well as ornamental gardens, woodlands, water gardens and wetlands. The

picturesque, landscaped grounds cover over 535ha and comprise a vast collection of trees and shrubs. A large area of the site is a Grade II* listed Registered Park and Garden.

The tree collections at Wakehurst are managed by RBGK. None of the trees on site are subject to Tree Preservation Orders, nor do they sit within a conservation area. The native trees are managed under an approved Forestry Commission Woodland Management Plan, whilst the botanic collections are managed in line with the Designed Landscape Plan, which identifies a number of botanically important trees on the site.

The Millennium Seed Bank (MSB) | Planning permission was originally granted for the MSB in 1996 (AR/021/96), with the building being completed in 2000. The seed bank was set up to combat the effects of biodiversity loss and climate change and ensure the world's plants were safeguarded for use by future generations.

Seeds are collected by Kew scientists and partners through the Millennium Seed Bank Partnership. Using collected seeds, Kew and its partners engage in restoration projects and capacity-building programmes. Seeds are stored long-term in underground vaults under freezing conditions, while others are kept in -196 Celsius liquid nitrogen within cryopreservation tanks. The refrigeration system proposed to be replaced is used for the extreme cooling of the seeds in storage.

Today the MSB is the centre point for a global conservation initiative and a dynamic hub for research, restoration and collaboration. Its collections are used by researchers and conservationists worldwide to restore habitats and revive degraded ecosystems; contribute new traits and diversity to crop breeding and research; conduct cutting-edge research on climate adaptation, cryopreservation, and seed longevity; and train the next generation of seed experts.

Relevant planning history

There is extensive planning history for the wider site at Wakehurst, which is not repeated in detail here, however, some of the most pertinent applications in relation to the MSB and related plant/ infrastructure are outlined below:

- **DM/23/2895** | Installation of solar PV equipment on the roof.
- **13/01969/FUL + 13/03041/FUL** | Erection of a new boiler house to enclose a 500kW wood chip boiler which will serve the majority of the site heat demands and connection of the heat output from the biomass boiler to the existing plant rooms via the installation of heat distribution pipe work. The thermal stores, integral wood chip store and all ancillary equipment will also be installed within the new boiler house. Approved 08/08/13 and 17/10/13.
- **11/01339/FUL** | The installation of 588 solar PV modules onto several roofs of the building. Approved 20/07/11.
- **11/00299/FUL** | Installation of two heating oil storage tanks with retaining wall and fencing next to the service area of the millennium seed bank, allowing the termination of the existing piped supply which has become fragile and a risk to the surrounding environment.
- **AR/021/96 and AR/021/96/AP1** | The Millennium Seed Bank - a building for seed conservation and research, including academic and public viewing facilities and related landscaping. Approved 03/10/96 and 02/04/97.

Proposed works

The proposals comprise the replacement of the existing R404A refrigeration system, which has reached the end of its effective operational life span. R404A refrigerant systems are being phased out under current gas regulations and as such, it will be replaced with a CO₂ system which matches the other existing refrigeration system already located on site. Its replacement is necessary to ensure the continued safe and reliable operation of the cold room's important refrigeration system. The new external unit has also been sized to serve nine cold rooms instead of the current six, so has allowed for future expansion of the site.

The replacement external unit will be installed at ground level, near to the small wooded area close to the internal plant. Compared to the existing external units being located on the roof, this allows for shorter, more direct pipework, reducing installation complexity, refrigerant charger, and energy losses. Locating the unit at ground level also removes vertical lift requirements, improving system efficiency by lowering compressor and pumping energy demand. In addition, more stable ambient conditions and reduced solar exposure compared to the existing rooftop location will enhance heat rejection performance. The ground level positions also improves access for maintenance, supporting efficient operation over the system lifecycle, and avoids the need for roof-mounted structural supports, reducing installation impact.

Planning framework

Designations | The site lies within the High Weald National Landscape (formerly AONB), within the Countryside Area of Restraint. The site is within the Ashdown Forest 7km Zone of Influence. The area approx. 300m to the north is a Site of Special Scientific Interest (SSSI). It also forms part of the Ardingly Neighbourhood Plan Area. The site is some distance from the listed Mansion house and stables, and previous applications have established the MSB sits outside their curtilage. The MSB is also outside of the Grade II* Registered Park and Garden.

The policies within The National Planning Policy Framework 2025 (NPPF) (including the NPPG); and the Development Plan form a material consideration in the determination of this application. The adopted Development Plan, which the proposals are to be assessed against, comprises the Mid Sussex District Plan 2014-2031 (adopted March 2018), the saved policies of the Mid Sussex Local Plan (adopted May 2004), and the Ardingly Neighbourhood Plan (adopted March 2015). The Council has also adopted a Mid Sussex Design Guide Supplementary Planning Document (adopted November 2020).

A revised draft of the Local Plan was formally submitted for Examination on in July 2024 with hearings taking place at the end of October. The new Plan is currently subject to a legal challenge and so the adopted policies have been assessed below.

Planning policy assessment

The primary planning policy considerations in the determination of the enclosed application for the installation of the replacement plant are the visual impact on the landscape character of the National Landscape and countryside; the impact on heritage assets and their setting; biodiversity and ecological impacts; and amenity impact. These are each considered in relation to the planning policy framework in turn below.

Visual impact | NPPF Para 189 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes, which have the highest status of protection in relation to these issues.

MSDC Policy DP12 (Protection and Enhancement of Countryside) seeks to protect the countryside in recognition of its intrinsic character and beauty. Policy DP16 (High Weald Area of Outstanding Natural Beauty) states that development within the High Weald AONB will only be permitted where it conserves or enhances natural beauty and has regard to the High Weald AONB Management Plan. The policy confirms that small scale proposals which support the economy and social well-being of the AONB that are compatible with the conservation and enhancement of natural beauty will be supported. Policy DP17 (Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)) identifies that new development likely to have a significant effect on the Ashdown Forest SPA and SAC, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects.

The visual impact of this proposal is a key consideration, particularly being located within the High Weald National Landscape where great weight is given to conserving landscape and scenic beauty. The application site is a small area adjacent to the existing MSB, and the proposals comprise the replacement of existing plant with new plant of a similar size and scale in broadly the same location. Given the small scale and location of the proposed plant, it is not considered that there will be any visual impact to the National Landscape.

Overall, the proposals will preserve the landscape character of the High Weald National Landscape and surrounding countryside in accordance with relevant Policies DP12, DP16 of the Mid Sussex District Plan, Saved Policies C1 and C4, and Policy ARD 20 of the Ardingly Neighbourhood Plan.

Impact on heritage assets | The key primary legislation relevant to the planning process is as set out in the Planning (Listed Building and Conservation Areas) Act 1990 (the Listed Building Act). S.16 and s.66 of the Listed Building Act impose a statutory duty on planning authorities consider the impact of proposals upon listed buildings and their settings. The NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

MSDC Policy DP26 (Character and Design) requires all development to be well designed and sensitive to the countryside. Policy DP34 (Listed Buildings and Other Heritage Assets) requires development to protect listed buildings and their settings. Policy DP36 (Historic Parks and Gardens) confirms that the character, appearance and setting of a registered park, or park or garden of special local historic interest will be protected.

The main heritage assets to consider are the setting of the Grade II* registered park and garden, the Grade I listed mansion, and the Grade II* listed Stables. The proposals will not be visible within views to or from the mansion, stables or the RPG and will not affect their setting. Therefore, there will be no heritage impact on these asset. Similarly, due to the discreet location adjacent to an existing building and the cooling system's unobtrusive nature in a back of house area of the estate, the proposals will not be visible from the wider park and garden. The proposals are located in an already developed area of the park, and will not impact on the setting of the historic gardens. The proposals are therefore in accordance with MSDC District Plan Policies DP34 and DP36, as well as Chapter 16 of the NPPF.

Biodiversity and ecological impacts | The site consists of only the small area of land needed to site the replacement cooler serving the MSB, therefore it will impact less than 25m² of habitat. The development is exempt from the biodiversity net gain requirements under Part 4(1-3) of the Exemptions Regulations 2024 for the following reasons:

- The development does not impact an onsite priority habitat.
- The development impacts (a) less than 25 square metres of onsite habitat that has biodiversity value greater than zero; and (b) less than 5 metres in length of onsite linear habitat.

It is also noted that upcoming changes to national BNG legislation will be in place by July 2026, and will exempt sites under 0.2ha from the requirement to demonstrate BNG. Overall, the proposals will not impact biodiversity or ecology on site and are wholly in accordance with national and local planning policy.

Amenity impact | The closest residential premises to the site are nos. 1-4 Pondfield Cottages, the nearest boundary of which is located approximately 150m to the west.

A Noise Impact Assessment has been submitted which confirms the plant will operate within acceptable levels. Given the distance to the nearest noise-sensitive receptor and, crucially, that the proposal comprises the replacement of similar, existing plant, it is considered that the proposals will not result in any adverse amenity impacts and are in accordance with Policy DP26 of the MSDC District Plan.

Summary

Planning permission is sought for the replacement of the existing refrigeration system associated with the MSB at Wakehurst. The proposals will contribute to RBGK's Sustainability Strategy which sets out a commitment to become Climate Positive by 2030, with a priority of replacing older plant and heating/ cooling systems for low carbon replacements.

Overall, there will be no impact on the landscape character of the National Landscape and countryside as a result of the proposed works, nor on the setting of the Grade I listed mansion, Grade II* listed stables, or Grade II* registered park and garden. The proposals are discreetly located and replacing existing plant in broadly the same location.

The proposals therefore comply with all NPPF and Mid Sussex District Council's planning policy objectives.

If you have any questions, please contact henry@theplanninglab.com (0207 257 9363).

Yours faithfully

The Planning Lab