

26 March 2026

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

FAO: Katherine Williams

Dear Officers

Change of use and refurbishment of Havelock Farm | Royal Botanic Gardens Kew (Wakehurst), Wakehurst Place, Selsfield Road, Ardingly, RH17 6TN

Introduction

Enclosed is a planning application for made on behalf of Royal Botanic Gardens, Kew (RBGK), in relation to proposals for the refurbishment and conversion of Havelock Farm at their site at Wakehurst, Ardingly. The project comprises the consolidation of ancillary office spaces at Wakehurst within the site. This will require the change of use of the existing buildings at Havelock Farm and some physical alterations to accommodate the proposals. The proposed description of development for the planning and listed building consent application is:

“Change of use and refurbishment of the existing buildings at Havelock Farm and associated works.”

The proposed office hub at Havelock Farm will consolidate staff over the site enabling collaborative working and opening up an alternative use of the Mansion to be a welcoming and informative visitor experience. This application follows pre-app discussions with MSDC in March 2025, where the principle of the development was agreed.

Application content

This application has been submitted to Mid Sussex District Council (MSDC) via the Planning Portal (ref: PP-14803178). This letter provides the planning justification and context. The following also forms part of the application:

- Application form;
- Design, Access and Sustainability Statement, prepared by Martin Ashley Architects;
- Heritage Impact Assessment, prepared by Martin Ashley Architects;
- Location Plan (ref. 2280-2_00_01);
- Existing Site Plan (ref. 2280-2_00_02);
- Existing GA Plan (ref. 2280-2_00_03);
- Existing Roof Plan (2280-2_00_04);
- Existing GA Elevations, Bothy and East Range (2280-2_00_10);
- Existing GA Elevations, South Range North (2280-2_00_11);
- Existing GA Elevations, South Range South (2280-2_00_12);
- Existing GA Elevations, Gable Ends (2280-2_00_13);
- Demolition GA Plan (2280-2_03_01);
- Demolition Roof Plan (2280-2_03_02);
- Demolition Elevations (2280-2_03_04);
- Proposed GA Plan (2280-2_01_03);
- Proposed Roof Plan (2280-2_01_04);
- Proposed Sections, South Range (2280-2_01_07);
- Proposed Sections, Bothy and East Range (2280-2_01_08);
- Proposed Elevations, Bothy and East Range (2280-2_01_10);
- Proposed Elevations, South Range North (2280-2_01_11);
- Proposed Elevations, South Range South (2280-2_01_12);
- Proposed Elevations, Bothy and South Range Gables (2280-2_01_13);

- Condition Survey Elevations, Bothy and East Range (2280-2_02_06);
- Condition Survey Elevations, South Range (2280-2_02_07);
- Condition Survey Elevations, Gable Ends (2280-2_02_08);
- Energy Statement, prepared by MTA;
- Structural Report, prepared by SFK Consulting;
- Drainage Strategy, prepared by SFK Consulting;
- Ecology Report, prepared by Surrey Wildlife Trust.

The relevant application fee of £673 (inc. service charge) has also been submitted via the Planning Portal.

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 application site | The site subject to this pre-application request comprises Havelock Farm which sits adjacent to (but not within) the northern boundary of the Grade II* listed Wakehurst gardens. The farm buildings are unlisted, but they are considered as non-designated heritage assets. The current use of the farm buildings is a mix of workshops/stores, interim staff offices, and series of dilapidated stables, all of which are ancillary uses to the wider Wakehurst estate. The buildings, which border a central courtyard / area of hardstanding, comprise the West Range stables, the South Range stables, the East Range, and the Bothy.

The site lies within the High Weald National Landscape (former AONB), a countryside area of development restraint, Ardingly's Neighbourhood Plan Area, WSCC Archaeological Notification Area under the Grade: Red, and within the Ashdown Forest 7km zone of influence. The site lies within flood zone 1, meaning it has a low probability of flooding. There are no existing trees within the application site boundary.

The site lies adjacent to the area for the new Wakehurst Conservation Research Nursery ("WCRN") facility, which obtained planning permission in 2023 (ref. DM/22/1774). Havelock Farm was included within the original planning application boundary as the proposals included the demolition of some of the existing agricultural buildings on the Havelock Farm site. These buildings have now been demolished (i.e. the planning permission has been implemented), with the remaining Havelock Farm buildings left in situ.

The nearest private residential dwellings include Wakehurst Farmhouse immediately to the north-east of the site, and Pondfield Cottages which are located approximately 130m to the north.

Relevant planning history

There is a long planning history concerning the use of the buildings which make up Havelock Farm, with various overlapping decisions varying their use over time. An overview of the most relevant applications is included below:

- **AR/025/80** | Change of use of bothy and stables for use as dwelling-house (refused 02/09/1980).
- **AR/031/80** | Consultation under Circular 7/77 for the conversion of the bothy, at present used as offices, for the accommodation of four resident students (no objection 03/10/1980).
- **AR/044/80** | Established use for cottages and stables (not proceeded with).
- **AR/011/81** | Change of use of former bothy and stables for use as a dwelling (granted 03/12/1982).

- **12/00725/LDC** | Lawful Development Certificate for conversion of barns and stables into residential accommodation (granted 06/07/2012). This restricted the occupation to agricultural workers.
- **14/02453/COU** | Change of use of agricultural land and buildings for use as part of adjoining botanic gardens and research centre (granted 08/10/2015).
- **DM/22/1774** | Demolition of existing agricultural buildings (with those of heritage value to be retained), formerly known as Havelock Farm, and the development of a new conservation and research nursery (granted 5/6/2023).

Need for the proposals

Apart from the Millennium Seed Bank, desk-based staff and teaching facilities at Wakehurst are currently spread between the Mansion (first floor), The Orchards Building, the Bothy at Havelock Farm, and a block of temporary portacabins. The decant into the temporary portacabins during the Mansion roof conservation works, has been received positively by RBGK as it has facilitated open plan working, allowing more departmental mixing.

Havelock Farm was previously scheduled for demolition in its entirety, but has since been seen as a viable prospect for re-utilisation and preservation. The existing buildings have been identified by RBGK as a site to maintain the changes to working arrangements and permanently consolidate the offices facilities at Wakehurst with the aim of creating modern, flexible working spaces for staff. This proposed strategy will free up the historic Mansion to be used to support and enrich the wider visitor experience and allow the removal of the temporary portacabins from the gardens.

Proposed development

The proposals comprise the refurbishment and conversion of the farmstead into habitable offices. Forty-seven new deskspaces are to be provided for office staff alongside a communal space with open kitchen and supporting meeting and print rooms. A full scope of external works is set out in the submitted DAS. A number of internal works are also included in the current proposals, although it is noted that these do not specifically require planning permission.

Sustainability measures are proposed to reduce the building's energy consumption, including new PV panels and the replacement of windows throughout with new double glazed units. The existing Bothy and south-west range timber windows will be retrofitted with double glazing to conserve their heritage significance.

Planning framework

Designations | The site lies within the High Weald National Landscape (formerly AONB), within the Countryside Area of Restraint, and on the boundary of the Grade II* Registered Park and Garden. 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 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

Principle of development | MSDC Policy DP12 states that the countryside will be protected in recognition of its intrinsic character and beauty. Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan. Ardingly Neighbourhood Plan Policy ARD20 states that the Neighbourhood Plan will support development proposals which will enable Wakehurst Place and the Millennium Seed Bank to expand to meet new and changing needs as both a tourist destination and centre of research of international importance, provided that the design is sympathetic to the heritage assets and the important landscape setting.

MSDC Policy DP16 relates to development within the National Landscape and states that development within the High Weald Area of Outstanding Natural Beauty (AONB), will only be permitted where it conserves or enhances natural beauty and has regard to the High

Weald AONB Management Plan. Policy DP19 states that tourism related development in the countryside, including extensions to existing facilities, visitor accommodation and the re-use of rural buildings will be permitted provided it supports the sustainable growth of the rural economy, and maintains or where possible enhances the quality of the rural and landscape character of the District, in accordance with Policy DP12. Similarly, Policy DP24 states that development that provides new and/or enhanced leisure and cultural activities and facilities, including allotments, in accordance with the strategic aims of the Leisure and Cultural Strategy for Mid Sussex will be supported.

At present, the ancillary office spaces at Wakehurst are spread across the estate, including within two temporary portacabins within the staff car park (permitted under ref. DM/22/0917 and extended by application ref. DM/25/0180). The current provision is insufficient and does not meet RBGK's requirements to provide for their staff. There is a clear need for expanded ancillary office space at Wakehurst, and consolidating all of these in one area will free up other parts of Wakehurst (including the listed Mansion) for other uses. The proposed accommodation will be used solely by RBGK Wakehurst staff.

The proposals are therefore in accordance with policies DP12, DP16, DP19 and DP24 of the Mid Sussex District Plan, which support tourism and leisure developments. Furthermore, the proposals comply with the Ardingly Neighbourhood Plan Policy ARD20, which support proposals which enable Wakehurst to expand to meet new and changing needs as a tourist destination, provided the design is sympathetic to the heritage assets and the important landscape setting.

Overall, the proposals will enable RBGK Wakehurst to provide a new, improved and permanent ancillary office and educational space. The proposals are also in accordance with MSDC policies which support educational, tourism and leisure developments, as well as development that provides necessary infrastructure that contribute to creating sustainable communities. The principle of development is, therefore, acceptable and aligns with national and local planning policies.

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. Paragraph 207 of the NPPF sets out that where proposals affect heritage assets local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 212 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. Paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

MSDC Policy DP34 states that development that retains buildings which are not listed but are of architectural or historic merit, or which make a significant and positive contribution to the street scene will be permitted in preference to their demolition and redevelopment.

The Havelock Farm buildings are not listed, however they are non-designated heritage assets. The other main heritage assets to consider are the Grade II* registered park and garden, and the three listed buildings within the grounds of Wakehurst – namely the Grade I Wakehurst Place, Grade II* listed stables to the north-east of Wakehurst Place, and the Grade II listed South Lodge and Gateway. These structures are relatively far away and are unlikely to be impacted by the proposals.

The proposals seek to refurbish the existing Havelock farm buildings, retaining any features of note insofar as possible and re-opening existing bricked up areas. In addition, new roof tiles, rainwater goods, windows, doors and boundary gate are proposed, all of which will help to improve the appearance of the buildings. Therefore, it is considered that the proposals will have a positive impact in heritage terms, in accordance with NPPF policies as well as MSDC District Plan Policy DP34.

In turn, the proposals will protect the setting of the registered garden as no significant increase in height, scale or massing of the Havelock Farm buildings is proposed. This will ensure that the registered garden's special features are protected, together with its setting and views, in accordance with MSDC District Plan Policy DP36. Further, the proposals will provide a permanent office space for use by Wakehurst staff. This will enable the removal of the temporary portacabins which are currently located in the staff car park adjacent to the Orchards administration building. This will have a positive impact in heritage terms.

Overall, the proposals are in accordance with design and heritage policies as set out within the NPPF, MSDC District Plan and Ardingly Neighbourhood Plan.

Energy + sustainability considerations | As explained above, the proposals form part of RBGK's wider sustainability aims to become Climate Positive by 2030. This aligns with national planning policy and legislation, as the UK has a legally binding target to reduce its emissions to Net Zero by 2050 under the Climate Change Act, which also introduced a series of carbon budgets up to 2050 with set interim targets for emissions reductions. MSDC Policy DP39 states that all development proposals must seek to improve the sustainability of development and should, where appropriate and feasible, use renewable sources of energy.

Achieving a sustainable conversion is one of the core design principles of the scheme. Converting the mostly redundant existing buildings into open plan, modern, flexible workspaces enables the buildings to be reused whilst avoiding the waste and embodied carbon that would be associated with a more extensive redevelopment. Internal rather than external wall insulation will be installed to reduce heat loss and energy requirements which will preserve the external setting of the farmstead. Overall, the proposals will seek to minimise energy use through the design of the scheme and building layouts including through the use of natural lighting and ventilation, in accordance with MSDC Policy DP39.

Biodiversity and ecological impacts | The site consists of only the compound and hardstanding, with no floral vegetation on site, therefore it is of a low ecological value. The development is exempt from the biodiversity gain planning condition 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.

An Ecology Report has been prepared by Surrey Wildlife Trust and sets out any impacts from the development on local ecology. The report clearly identifies the proposed mitigation and compensation measures and explains how these will adequately address all likely adverse effects, and identifies relevant mitigation and compensation measures.

Overall, the proposals will not impact biodiversity on site and are wholly in accordance with national and local planning policy.

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

Yours faithfully

The Planning Lab