

20 July 2026

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

FAO: Katherine Williams

Dear Officers

Wild Play | Royal Botanic Gardens Kew (Wakehurst), Wakehurst Place, Selsfield Road, Ardingly, RH17 6TN

Introduction

Enclosed is a planning application made on behalf of Royal Botanic Gardens, Kew (RBGK), in relation to proposals for new play and outdoor engagement facilities at their site at Wakehurst, Ardingly. The project comprises the installation of new play structures and accessibility improvements, and will transform how children engage with nature and science at Wakehurst through adventurous, nature-based play. The project will place plants and fungi at the heart of the visitor experience while attracting new audiences, increasing family memberships, and generating additional visitor spend to support RBGK's charitable objectives. The proposed description of development for the planning and listed building consent application is:

"Installation of new structures and accessibility improvements to create a new 'Wild Play' facility and associated works."

The project will place plants and fungi at the heart of the visitor experience while attracting new audiences, increasing family memberships, and generating additional visitor spend. This application follows initial discussions with Mid Sussex District Council (MSDC) in June 2025, where the principle of the development was agreed.

Application content

This application has been submitted to MSDC via the Planning Portal (ref: PP-15081671). This letter provides the planning justification and context. The following also forms part of the application:

- Application form and Certificate;
- Planning drawings prepared by Southern Green, as set out on the submitted Drawing Register;
- Design & Access Statement, prepared by Studio Hardie
- Heritage Statement, prepared by Martin Ashley Architects
- Archaeological Desk-Based Assessment, prepared by Compass Archaeology
- Ecological Impact Assessment, prepared by Surrey Wildlife Trust
- Biodiversity Net Gain Report, prepared by Surrey Wildlife Trust
- Arboricultural Impact Assessment, prepared by Tree Amigos
- Tree Constraints Plan, prepared by Tree Amigos
- Tree Retention and Removal Plan, prepared by Tree Amigos

The relevant application fee of £1,945 (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 (RPG).

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 | Wild Play will occupy a centrally located half-acre site within Wakehurst's 535-acre landscape. The site comprises land southwest of Havelock Farm which sits just within the northern boundary of the Grade II* RPG. The site has connections to the historic Mansion, and is adjacent to the new Lansdown Conservation and Research Nursery, providing a direct link to contemporary scientific research.

The project forms part of Wakehurst's wider masterplan to bring previously inaccessible areas into public use and enhance the visitor experience. Its position ensures that play is fully integrated with science, conservation and landscape rather than existing as a separate attraction.

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 a number of existing trees within the application site boundary.

The site lies adjacent to the area for the new Lansdown Conservation Research Nursery ("LCRN") facility, which obtained planning permission in 2023 (ref. DM/22/1774) and Havelock Farm, which is currently subject to an application for change of use and refurbishment (DM/26/0588). The nearest private residential dwellings include Wakehurst Farmhouse immediately adjacent to the Havelock Farm site, and Pondfield Cottages which are located approximately 200m to the north.

Relevant planning history

There is a long planning history covering the wider estate at Wakehurst, however there is no relevant history relating to this specific site.

Need for the proposals

RBGK Wakehurst's ambition is to increase annual visitor numbers and to engage people as part of its mission to create a world where nature is protected, valued, and managed sustainably. At Wakehurst there are currently no play and outdoor engagement opportunities at the core site visited by families, limiting the offer and ability for engagement with young people and families.

Wild Play at Wakehurst will be developed on the former Wood Yard storage area south of Havelock Farm, forming part of Wakehurst's wider masterplan to bring previously inaccessible areas into public use and enhance the visitor experience. Wild Play will transform how children engage with nature and science outdoors, and aims to spark curiosity, build confidence, and inspire lifelong environmental stewardship. Wild Play is forecast to generate a year-on-year increase in visitor numbers following opening, bringing more children and families into meaningful contact with nature. Importantly, it reflects the broader shift towards immersive wellbeing experiences, enabling children and families to engage physically, emotionally and creatively with the landscape.

Proposed development

The proposed development comprises the conversion of an existing partially open, partially wooded area which is centrally located within RBGK Wakehurst. Wild Play has been conceived as a landscape rather than a playground, and the design seeks to create a series of interconnected outdoor rooms where play, learning and exploration emerge naturally from the existing landscape.

The overall layout has been informed by the existing landscape structure, mature trees and topography. Play structures have been carefully integrated within the landscape rather than becoming dominant visual elements, and the existing footpaths within the site will be reworked into a combination of timber and gravel informal pathways. The concrete platform for the existing structure will be removed, as well as the existing garden shed to the north of the northern path. Play equipment will be added throughout the site, in addition to areas for outdoor seating and a lookout point. The proposals also include for new soft landscaping and the planting of new trees.

More detail on the proposed physical works, types of structures to be installed, and strategy for integrating play equipment into the landscape is set out in the submitted DAS.

Planning framework

Designations | The site lies within the High Weald National Landscape (formerly AONB), within the Countryside Area of Restraint, and just inside the boundary of the Grade II* RPG. 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 2024 (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. Progress on the new Plan has been stalled subject to a legal challenge, and it is currently scheduled for adoption in late 2026.

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, 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 in accordance with the strategic aims of the Leisure and Cultural Strategy for Mid Sussex will be supported.

Wild Play will bring more children and families into meaningful contact with nature. Beyond visitor growth, Wild Play represents a step change in public engagement. Science, biodiversity and environmental change will be embedded within everyday visitor experiences through immersive, participatory interpretation. Children will be encouraged to learn through exploration and action rather than passive observation, leading to deeper and more lasting engagement. The project will also provide national leadership, acting as an exemplar of inclusive, science-led nature play, generating insight into how play can support wellbeing, environmental awareness and public engagement at scale.

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 outdoor play and educational space 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 will be required to protect listed buildings and their settings. This will be achieved by ensuring that a thorough understanding of the significance of the listed building and its setting has been demonstrated and special regard is given to protecting the setting of a listed building. Policy DP36 states that the character, appearance and setting of a registered park, or park or garden of special local historic interest will be protected. This will be achieved by ensuring that any development within or adjacent to a registered park, or park or garden of local historic interest will only be permitted where it protects and enhances its special features, setting and views into and out of the park or garden.

The key heritage asset to consider is the Grade II* RPG. The proposals would introduce a new visitor use into a currently functional and transitional part of the estate, rather than into one of its principal designed spaces. The site is relatively low in design significance, although it contributes to the legibility of the estate as a place composed of designed, operational and transitional areas. The proposals would introduce some local visual change arising from structures, path works and planting adjustments however These effects are moderated by the enclosed character of the site, its lower sensitivity relative to the principal designed landscape, and the proposed mitigation. In visual terms, the impact on the wider registered landscape is likely to be low and not fundamentally harmful to the significance of the RPG as a whole.

The other main heritage assets to consider are 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. With regard to the Mansion, potential effects arise only through setting. The site is screened from the Mansion and formal gardens by landform, vegetation and intervening landscape compartments, with only limited filtered visibility at most. On that basis, the proposal is not considered likely to materially affect the significance of the Mansion. No direct effect is identified on either the stables or South Lodge and Gateway.

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

Archaeology | MSDC Policy DP34 states that the Council will seek to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the character and quality of life of the District. Significance can be defined as the special interest of a heritage asset, which may be archaeological, architectural, artistic or historic. The site is within an Archaeological Notification Area and the application is therefore required to consider any potential impacts on below ground assets.

An Archaeological Desk-Based Assessment (DBA) has been undertaken by Compass Archaeology, which notes that there is no evidence that the site itself has ever been developed, aside from the existing footpaths and concrete platform for the semi-permanent tent structure. As a result, the DBA concludes that the site has low to moderate potential for encountering finds and features dating to the prehistoric period, and little potential for Roman, Saxon, medieval or early post-medieval evidence, over and above the occasional residual or redeposited find. The site is also considered to have low to moderate potential for later post-medieval and modern remains, and it is unlikely that any such finds would be of significant.

Based on the site's location within the historically significant Wakehurst Estate and within the Wakehurst Place Grade II* RPG, and given the low to moderate potential for encountering prehistoric finds, the DBA recommends that if any mitigation is required by MSDC, that this could be achieved through a planning condition attached to the future consent. The proposals are therefore considered to be in accordance with national policy as well as MSDC Policy DP34.

Biodiversity and ecological impacts | The NPPF states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then planning permission should be refused (para 193). Additionally, under Schedule 7A of the Town and Country Planning Act 1990, a minimum 10% biodiversity net gain (BNG) is now required from both minor and major development. MSDC Policy DP38 states that biodiversity will be protected and enhanced by ensuring development contributes and takes opportunities to improve, enhance, manage

and restore biodiversity and green infrastructure, so that there is a net gain in biodiversity and protects existing biodiversity, so that there is no net loss of biodiversity.

A BNG Report has been prepared by Surrey Wildlife Trust, which demonstrates the project will deliver and significantly exceed the required BNG for habitats and hedgerows. The proposed development will result in a habitat BNG of 208%, and a hedgerow BNG score of 2142%.

The proposals therefore fully accord with national and local ecology and biodiversity policies.

Trees | MSDC Policy DP37 supports the protection and enhancement of trees and encourages new planting. It also seeks to protect the character of areas which have landscape importance. In particular, ancient woodland and aged or veteran trees will be protected. Development that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance, will not normally be permitted. Trees, woodland and hedgerows will be protected and enhanced by ensuring development incorporates existing important trees, woodland and hedgerows into the design of new development and its landscape scheme, has appropriate protection measures throughout the development process, and takes opportunities to plant new trees, woodland and hedgerows within the new development to enhance on-site green infrastructure and increase resilience to the effects of climate change.

A total of 15 individual trees and five groups will require removal to facilitate development. Of the trees to be removed: eight individuals were attributed Category B status; six individuals and four groups were attributed Category C status; and one individual and one group were attributed Category U status. A number of other trees will require crown lifting and/ or the shortening of lower branches. Appropriate mitigation, including a replanting plan, is proposed to compensate for any impact on local visual amenity.

Summary

Planning permission is sought for the creation of a new Wild Play facility at Wakehurst. The proposals will contribute to RBGK's aims to increase public engagement and contact with nature, as well as bringing previously inaccessible areas into public use and enhancing the visitor experience.

The proposals are of a scale that is appropriate to the character and function of the surroundings. Due to the chosen location and the existing screening that is offered by trees, the proposals will not have a significant impact on the RPG or nearby listed buildings or the surrounding environment. Overall, there will be no significant impact on the landscape character of the National Landscape and countryside as a result of the proposed works.

The proposals therefore comply with all NPPF and MSDC's planning policy objectives.

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

Yours faithfully

The Planning Lab