

Wokingham Borough Council
Shure End,
Wokingham,
Berkshire,
RG40 1BN

Our Ref: 786/5031
Date: 12/05/2026

Henley Royal Regatta, Temple Island – Planning and Heritage Cover Letter

Dear Planning Team,

We write on behalf of Henley Royal Regatta (HRR) to submit a full planning application seeking permission for the installation of an aeration foul drainage treatment system on Temple Island, which is an island in the River Thames, located around 2 kilometres downstream of Henley-on-Thames.

The new foul drainage system is required because the existing foul drainage collection service, provided by the Environment Agency (which comprised a foul sewage barge towed by a tug), has been revoked. This is something which can't be replaced by HRR directly and leaves Henley Royal Regatta (HRR) with a significant problem for the future use of the island. HRR are eager to ensure a solution is possible, to allow long term stewardship of the island and its' Grade II listed building.

This planning and heritage cover letter outlines the site context, the relevant planning history, relevant planning policy, and then provides an assessment of the proposed works. This provides key information to Wokingham Borough Council to facilitate their consideration of the proposed works.

Should the Local Planning Authority require any further information, please do not hesitate to contact us using the details provided below within this application.

Site Context

Temple Island is situated within the River Thames itself, to the north of Henley-on-Thames, and in broad terms this section of river is surrounded by open countryside. The island is managed by Henley Royal Regatta on a long lease agreement and owned under a Trustee group (Trustees of The Temple Island #1 and Trustees of The Temple Island #2).

Temple Island marks the prestigious starting point of the iconic Henley Royal Regatta rowing course, which heads upstream, toward Henley-on-Thames. Outside of the Regatta event

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operations, the Temple Island venue is used for private hires, including weddings and corporate functions, and the income generated helps to keep the Listed building maintained. Temple Island is shown in the figures below:

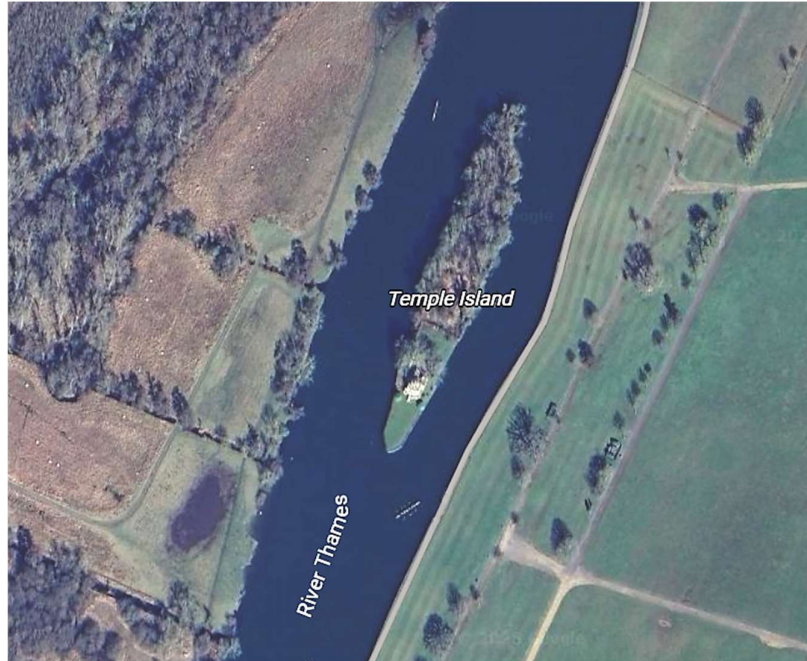


Figure 1: The site – Temple Island (Sourced: Google Earth)



Figure 2: Temple Island (Source: Edgars)

Until now, the Environment Agency has provided a foul drainage collection service on the river. This was fundamental to emptying the foul sewage tank on the island. This tank takes foul sewage from the sinks and W/C of the Temple Island property.



Figure 3: Location of Existing Foul Sewage Tank (under the manhole seen in photo above)

A new foul drainage system is required because the existing foul drainage collection service has been revoked, leaving Henley Royal Regatta with a significant problem for the future use of the island. In order to keep the property running, a permanent, long-term, solution must be found.

The proposed solution is to install a foul sewage treatment plant onto the site. In order to be visually discrete in this location, the proposed equipment would be hidden from view, to the left of the hedge (as shown in the above photograph). Full details of the proposed development are explored in the following pages of this planning cover letter.

Constraints

Landscape

The site does not fall within any designated National Landscape. It is located within a low-lying stretch of the River Thames, characterised by a generally flat river valley landform. The surrounding area forms part of a predominantly rural and largely undeveloped river corridor, contributing to a tranquil and open landscape setting.

Heritage

The Temple, on Temple Island is a designated Grade II listed building. Additionally, the site also lies within the Registered Grade II* Park and Garden of Fawley Court and Temple Island. These designations highlight the area's significant historic value and mean that any future development will be subject to a high degree of heritage sensitivity, ensuring that its architectural and landscape character is preserved and respected.

Temple Island is not however located within any designated Conservation Areas.



Figure 4: Image illustrating the Listed Building and Park and Garden in relation to the proposed works highlighted by the red circle (Sourced: Historic England)

Ecology & Trees

Temple Island lies to the east (200m) of a designated SSSI, Temple Island Meadows. This was designated in 1989 for its rare, species-rich wet grassland and high habitat diversity.

The northern part of the island is protected by Tree Preservation Order TPO-0445-1989, with additional individual trees in the southern section also subject to protection.

The site is additionally located within both a Mineral Safeguarding Zone and a Groundwater Consultation Zone, adding further environmental considerations.

The proposal has therefore been designed to remain minimal in scale and impact, ensuring that it does not adversely affect the ecological value of the area and instead supports the continued active use of and the preservation to the Listed building.



Figure 5: Images highlighting the TPOs located on the Island and the proximity of the Island to the SSSI
(Sourced: Wokingham Council & Magic Defra)

Flood Risk

The site lies within Flood Zone 3, indicating a high probability of flooding and therefore a constraint to vulnerable types of development.

Planning History

The planning history in relation to Temple Island is listed in the below table.

Table 1: Planning History			
Reference	Description	Decision	Date
PP/14499779	APPLICATION FOR WORKS TO PROTECTED TREE(S) TPO 445/1989, AREA 1 318N, Ash Fell. 318O, Ash Fell. 318P, Ash Fell. 318Q, Ash Fell dead tree. 318R, Sycamore Fell dead tree.	Tree consent approved	13/Jan/2026
L223283	APPLICATION FOR WORKS TO PROTECTED TREE(S) TPO 445/1989, AREA 1 312, Oriental Plane – Remove deadwood in excess of 25mm in diameter. Prune to provide 3m clearance from temple. 313, Horse Chestnut – Prune to provide 3m clearance from temple. 318, Mixed Sycamore, Poplar, Field Maple, Willow, Ash, Hawthorn – Remove tranche marked as A-F on sketch.	Tree consent approved	22/Dec/2022

The planning applications listed above represent all records currently available on Wokingham Borough Council's public planning register. While six additional applications are referenced on the council's website, the detailed information for these cannot be accessed because they pre-date the digital records system (pre-1998). Given their age and the lack of accessible

documentation, these historic applications carry limited material weight in the assessment of the current proposal.

The Proposed Development

The system is designed to treat up to 500 gallons per day of domestic-strength wastewater. The one-tank CEN5 model represents the most compact of the manufacturer's enhanced nitrogen-removal systems and has been specifically engineered for deployment in nutrient-sensitive environments. Its scale and specification ensure that the necessary wastewater improvements can be delivered with minimal intervention, while providing an environmentally responsible solution aligned with the sensitivities of the island setting. Figure 3 below is a visual representation of the aeration treatment system.

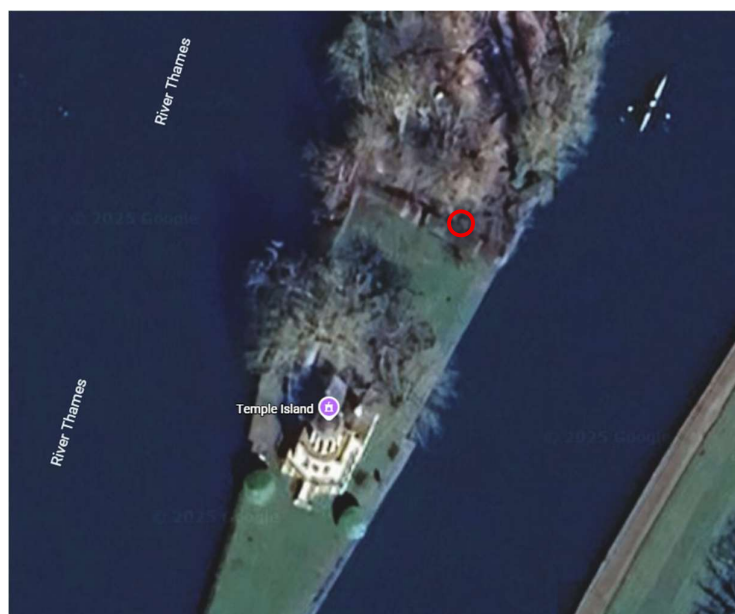


Figure 6: Proposed location for the unit, discretely hidden behind the hedge line (Sourced: Google Earth)

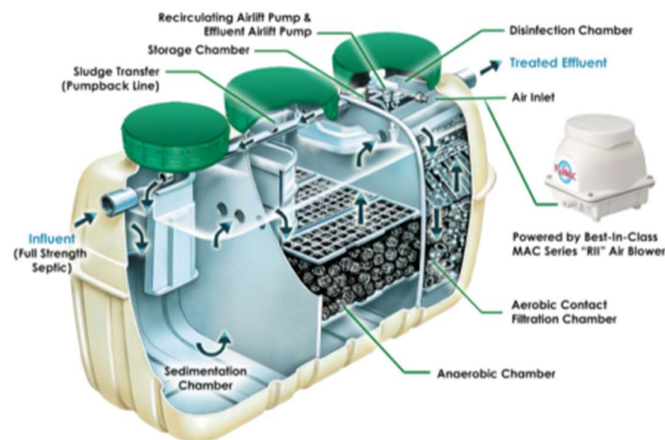


Figure 7: Image of the Fujiclean CEN5 (Sourced: FujiClean)

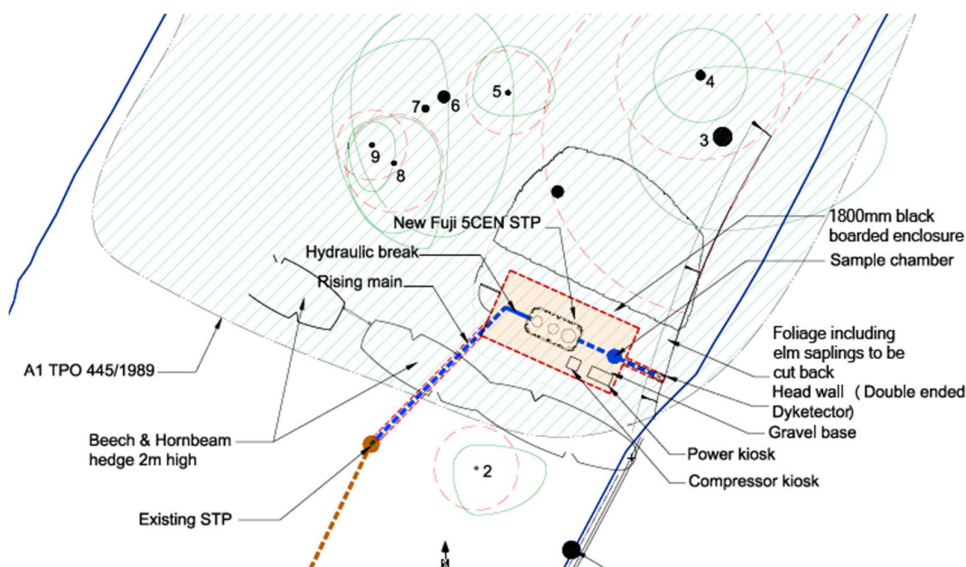


Figure 8: Proposed Plan

In summary, the solution selected to re-provide necessary foul drainage systems to the island is the smallest and most discrete possible, and has been specifically located behind the hedge line so that it is not visible from the Listed Building, nor from passing river traffic.

Prior to the submission of this application, dialogue has taken place with the National Trust Covenant Team, who in their role on the Covenant of the land, have approved the proposed works.

Planning Policy Context

The site is located within Wokingham Borough Council. With this in mind the development plan comprises of the Wokingham Core Strategy adopted in January 2010. Additional supplementary planning documents are listed below which also contribute to the development plan.

- Wokingham Managing Development Delivery (MDD)
- National Planning Policy Framework

The relevant Wokingham Core Strategy policies are listed in Table 2 below and include:

Table 2: Core strategy Policies	
Policy Number	Policy Title
Policy CP1	Sustainable development
Policy CP3	General principles
Policy CP7	Biodiversity
Policy CP11	Proposals outside development limits
Policy CP12	Green belt

The relevant policies from the Wokingham Managing Development Delivery (MDD) are listed in Table 3 below and include:

Table 3: Managing Development Policies	
Policy Number	Policy Title
Policy CCO1	Presumption in favour of sustainable development
Policy CCO3	Green Infrastructure
Policy CCO9	Development and flood risk
Policy CC10	Sustainable drainage
Policy TB01	Development within the Green Belt
Policy TB21	Landscape character
Policy TB23	Biodiversity and development
Policy TB24	Designated heritage assets

The National Planning Policy Framework is a material consideration. The relevant sections and associated paragraphs are listed below:

Table 4: National Planning Policy Framework (2024)	
Section	Relevant paragraph numbers
2. Achieving sustainable development	8, 10, 11
13. Protecting Green Belt land	153, 154
14. Meeting the challenge of climate change, flooding and coastal change	170, 176, 181
15. Conserving and enhancing the natural environment	187, 193
16. Conserving and enhancing the historic environment	202, 207, 208, 210, 215

Planning Assessment

Principle of Development

Planning applications that accord with the Development Plan should be approved (Policy CC01). There is, in doing so, a presumption in favour of sustainable development (CC01 & NPPF).

The Temple on Temple Island is an existing property and is Grade II Listed. This carries an importance on preservation of the built fabric. In order to use and upkeep the property, any use will require a foul drainage system. The existing operations by the Environment Agency that collected foul sewage have been revoked, leaving the island isolated from sewage treatment or collection.

The proposed development is a simple FujiClean treatment system. Owing to the installation and the engineering operations associated to it, this is a matter that technically requires planning permission.

The new foul drainage treatment plant is essential to re-providing the island with a permanent means of foul drainage, and therefore a means for being in active use.

Notwithstanding the above, the works are also reversible, so in the long term if the circumstances were to change, then the land could be returned to the original condition.

Heritage

The Temple is a Grade II Listed building. Temple Island does not sit within any Conservation Area. The island does sit within a Registered Park and Garden, which in itself is a statutory heritage designation.

The Temple – Grade II Listed (Research Source: HRR records)

Temple Island is an elegant ornamental folly designed by the 18th century English architect James Wyatt commissioned by the Freeman Family and constructed in 1771. It was designed as a fishing lodge for Fawley Court, a nearby historic house also owned by the Freeman family. In the 19th century, the island's ownership passed, with Fawley Court, from the Freeman family to the Mackenzie family. Excessive alternations were carried out under the new owner. A rise in the river level made it necessary for the surrounding ground of the Temple to be raised by several feet. This led to a change in the design of the south side of the building and a large wooden balcony was positioned with a double staircase down onto the grass. The Mackenzie family also erected a new stone statue of a nymph under the cupola. In 1987, the future of the island including the Temple was secured through the generosity of Mr and Mrs Alan Burrough. Their magnificent donation made it possible for Henley Royal Regatta to acquire a 999 year lease of the island from Miss Mackenzie, the freehold being vested in The Trustees of Temple Island. The Stewards of the Regatta carried out an exemplary restoration over the following three years.

Registered Park and Garden (Research Source: HRR records)

Temple Island is part of the 'Fawley Court and Temple Island' Registered Park and Garden (Grade II*). Fawley Court is an important historic estate comprising an early 18th-century garden and pleasure grounds surrounding a house built in the 1680s, possibly designed by Sir Christopher Wren. The estate evolved over several centuries, reflecting changing tastes in landscape design and architecture. In the 1730s, John Freeman created formal pleasure grounds with ornamental buildings, influenced by leading garden designers of the period. Major transformation occurred in the 1770s when Lancelot "Capability" Brown reshaped the parkland, introducing sweeping vistas, open lawns, and carefully framed views, notably towards Temple Island on the River Thames. The estate expanded significantly under Sambrooke Freeman, who also remodelled the house and commissioned James Wyatt to design the Fishing Temple on Temple Island in 1771, a key focal point of Brown's landscape. Subsequent owners added 19th- and 20th-century planting, altered the house and grounds, and introduced new estate buildings, while largely retaining the earlier layout. Located on the west bank of the Thames just north of Henley, the 65-hectare site includes formal terraces, wooded pleasure grounds, parkland, a kitchen garden, water meadows, and Temple Island. Together, these elements illustrate the layered development of a prominent English country estate and its designed landscape.

The Local Plan requires for new development generally to conserve, and where possible enhance the important character and special architectural or historic interest (TB24). Policy TB24 also particularly support initiatives that improves any assets that are recognised as being at risk.

Whilst the fabric of the Listed building itself is not ‘at risk’, it is clear that the active use of the building is threatened by the new-found lack of foul drainage arrangement. Henley Royal Regatta and the Trustees of the land have been put in a very difficult position.

An appropriate and proportionate solution has been proposed, as evidence in this report. To minimise the heritage impact, the treatment plant has been specifically located to be visually discrete.



Figure 8: Discrete/hidden location of the treatment equipment.

Owing to the discrete location, the small scale of the works, and the functional need for the equipment, we consider there is no impact on the setting or significance of the Listed buildings itself, and no perceptible adverse impact on the setting or significance to the Registered Park and Garden. These assets will remain to be observed and enjoyed in exactly the same way, with no diminishing effect on their historic or architectural significance.

In any event, paragraph 215 of the NPPF outlines 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 including, where appropriate, securing its optimum viable use*’.

Given the current lack of foul drainage arrangement, the proposal to provide this with a modern treatment system, should be considered a functionally necessary piece of work, and a key public benefit to secure the ongoing active use of the Listed building. Securing the viable use of the property is a material consideration. The existing use brings in an income that contributes to its stewardship and upkeep. Therefore positive weight should be afforded to the provision of a working foul drainage treatment system, as a functionally necessary piece of infrastructure for the island.

In light of the above, the proposal is in accordance with Policy TB24 and Section 16 of the NPPF.

Flood Risk and Drainage

National and local planning policy generally seeks to steer new development away from areas at highest flood risk, except where it can be demonstrated that the proposal is necessary and that no reasonably available alternative locations exist.

In this case, the proposed works are essential to the continued functioning and management of Temple Island, and by virtue of the island's geography, cannot be located elsewhere. It has been considered as to whether the works can be underground however this is not possible given the importance of accessible maintenance in the flood zone.

Ecology

There is a current BNG exemption for 'De-minimus' development. This is applicable where the works would not exceed 25sqm. The Government is currently consulting on the relaxation of BNG exemption, to raise this threshold to 0.2 Hectares.

On the basis of the current 25sqm exemption threshold, please be advised that this proposed development relates to around 23sqm of work. Therefore the work is exempt from BNG.

Given the lack of mature vegetation on the siting of the proposed foul sewage treatment tank, it has not been considered proportionate to conduct a site-specific preliminary ecological appraisal.

The site is not located within a SSSI. The nearest SSSI is around 200m away. The works are very minimal and further assessment on the SSSI is not considered proportionate for the works involved.

Finally the model of foul drainage treatment selected is one that is appropriate for sensitive settings. This type of plant has been used previously in ecologically sensitive regions, including the Lake District.

Trees

Policy TB21 seeks that proposals shall retain or enhance the condition, character and features that contribute to a landscape. Policy CC03 seeks to retain existing trees.

The wider site is covered under a Tree Preservation Order. To inform the exact position of the proposed treatment tank, a tree survey has been undertaken by Keen Arboriculture. This identifies there is a gap between the root protection areas of the mature trees to the north, and the beech and hornbeam hedge that is immediately south of the proposal.

The careful site selection process, taking on board the Tree Survey of Keen Arboriculture, result is no impact to root protection areas of the mature trees. Some minor area of scrub and saplings will be generally cleared in the position of the unit itself, however this is very minimal.

In this case all mature trees on the site are retained and not impacted by the proposed essential drainage works, and therefore the proposed development is in full accordance with the Development Plan.

Neighbouring Amenity

There are no neighbours in the vicinity of the proposed treatment plant, and therefore no adverse impacts on amenity to be weighed into the planning consideration.

Conclusion

This letter accompanies a full planning application submitted on behalf of Henley Royal Regatta for the installation of a small-scale foul sewage treatment plant on Temple Island, which is located within the River Thames approximately 2 kilometres downstream of Henley-on-Thames.

The application seeks permission to install a compact aerated foul sewage treatment system to serve the existing Temple building on Temple Island. The development is required following the withdrawal of the Environment Agency's foul sewage collection service, which previously provided the only means of sewage management for the island. As a result, the island is currently without a viable long-term foul drainage solution. The proposed development provides an essential, permanent and proportionate solution, enabling the continued active viable use of the site, which in turn supports the long-term stewardship of a designated heritage asset.

Temple Island is a highly sensitive site comprising a number of environmental and heritage designations. The Temple is a Grade II listed building, and the island lies within the Grade II* Registered Park and Garden of Fawley Court and Temple Island. The surrounding environment includes areas covered by Tree Preservation Orders, proximity to the Temple Island Meadows SSSI, and the site lies within Flood Zone 3. Despite these constraints, the site is not located within a Conservation Area, and its existing lawful use relies on the continued provision of essential supporting infrastructure.

The proposed treatment plant is the smallest and most discrete model capable of meeting the island's needs, specifically designed for use in environmentally sensitive locations. The unit will be located behind an existing hedge line, ensuring that it is not visible from the listed building or from passing river traffic, thereby preserving the setting and visual character of both the listed building and the Registered Park and Garden.

The proposal has been assessed against the relevant policies of the Wokingham Core Strategy, the Managing Development Delivery Local Plan, and the National Planning Policy Framework (2024). The development accords with policies relating to sustainable development, heritage conservation, Green Belt development, biodiversity, landscape character, and flood risk management.

The proposed foul sewage treatment plant represents an essential, sustainable and policy-compliant form of development, necessary to secure the continued active use and long-term conservation of Temple Island and its listed building. The development has been sensitively designed to respond to its highly constrained context and is fully consistent with the development plan and the National Planning Policy Framework. Planning permission is therefore considered to be fully justified.

I trust that the information provided is sufficient in detail for the planning application, and I look forward to working with Officers during the consideration of this case. If you have any queries please do contact me on the details provided.

Yours faithfully,

Iain Summerwood – BA(Hons) MSc MRTPI
Associate
Edgars Limited