

**From:** Paul Leadbeater <[pleadbeater@elmbridge.gov.uk](mailto:pleadbeater@elmbridge.gov.uk)>  
**Sent:** 18 June 2021 12:41  
**To:** Jennifer Margetts <[JMargetts@elmbridge.gov.uk](mailto:JMargetts@elmbridge.gov.uk)>  
**Cc:** Ian Tucker <[itucker@elmbridge.gov.uk](mailto:itucker@elmbridge.gov.uk)>  
**Subject:** RE: 2018/3810 Hampton Court Station

Dear Jenny,

Further to your email of 11 June 2021 enclosing a letter from Mr Ray Townsend on behalf of Hampton Court Rescue Campaign (HCRC) – Objection on air quality matters re application 2018/3810. The letter has no date.

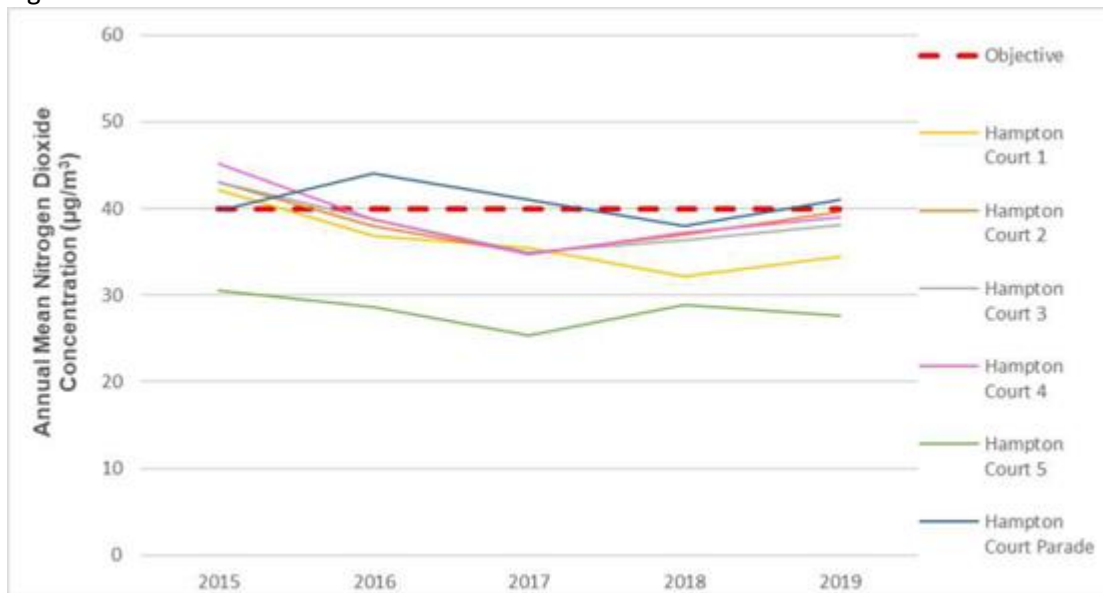
The letter raises many issues in relation to air quality and the planning application 2018/3810 not all for Environmental Health. As discussed, we would recommend the applicants air quality consultant address the alleged concerns with their reports.

In the limited time available Environmental Health would make the following comments.

Environmental Health have sent a memo dated 27 April 2021 responding to the applicants updated air quality technical note (AQTN) dated April 2021.

The levels of Nitrogen Dioxide(NO<sub>2</sub>) within the Hampton Court AQMA has been decreasing since the AQMA was declared in 2008. Figure 4 Trends in Annual Mean NO<sub>2</sub> Concentrations at Hampton Court taken from the published 2020 Annual Status Report ASR) demonstrates this.

Figure 4



This trend is seen in other AQMA's within the borough and resulted in Cobham AQMA been revoked last year resulting in the Council now having 6 AQMA. This trend is also reflected nationally.

The real time monitor at Hampton Court recorded an annual mean concentration for NO<sub>2</sub> was 41ug/m<sup>3</sup> just above the objective level of 40ug/m<sup>3</sup> in 2019. The 2021 ASR reporting 2020 monitoring data which will shortly be submitted to DEFRA records the annual mean at the station as

26ug/m3. This significant reduction, taking the annual mean below the objective level is in the main due to the Covid pandemic.

In the Councils published draft Air Quality Action Plan (AQAP) the section that estimates future reductions within AQMA found a likely 40% reduction by 2025.

*“Figure 3.7 shows that the emission outputs from the EFT demonstrate a predicted decrease in NOx emissions between 2019 – 2025 of approximately 40% in Weybridge, Esher and Hampton Court AQMAs. Taking into consideration the emissions reductions required in the AQMAs (Table 3.1), Figure 3.7 therefore suggests that the emissions reductions required could possibly be achieved by 2025 without the implementation of AQAP measures”*

Elmbridge Council took the lead on a Surrey Air Alliance air quality modelling project that saw Cambridge Environmental Research Consultants establishing a clear baseline for key pollutants (NO2, particulates PM10 and PM2.5) across Surrey. The report was completed in 2019 and published in the Councils 2020 ASR. <https://www.elmbridge.gov.uk/pollution/local-air-quality>

This found that particulates PM10 and PM2.5 levels within Surrey and specifically Elmbridge meet objective levels with the exception of some locations close to major roads such as the A3 and M25. The Council has no evidence to support declaring an AQMA's due to exceedances of the UK objective levels for particulates. The CERC report supports this view.

While there is no legal requirement for local authorities to monitor particulates, the Council is currently planning to install a roadside particulate monitor within the borough in the next year, subject to the successful outcome from a Community Infrastructure Levy funding application.

The Environmental Health memo dated 27 April 2021 states “the updated AQTN reaches the same conclusion as the assessment within Chapter 9 of the 2018 ES that the impact of the development remains insignificant and that the onsite receptors are predicted to be within current UK limit values. The Pollution Teams memo of the 12 March 2019 stands, including the recommended air quality conditions should the application be approved.”

Kind regards,

Paul Leadbeater | Principal EHO | Pollution  
Team  
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Elmbridge Borough Council, Civic Centre, High Street, Esher, Surrey, KT10 9SD

**From:** Jennifer Margetts <[JMargetts@elmbridge.gov.uk](mailto:JMargetts@elmbridge.gov.uk)>  
**Sent:** 18 June 2021 12:35  
**To:** Paul Leadbeater <[pleadbeater@elmbridge.gov.uk](mailto:pleadbeater@elmbridge.gov.uk)>  
**Subject:** RE: 2018/3810 Hampton Court Station

Thanks Paul – we are going to July committee so I am frantically trying to meet the deadline of next Thursday. I am hoping the agent comes back with the air pollution notes in the meantime!

Thanks

Jen

**From:** Paul Leadbeater <[pleadbeater@elmbridge.gov.uk](mailto:pleadbeater@elmbridge.gov.uk)>  
**Sent:** 18 June 2021 12:18  
**To:** Jennifer Margetts <[JMargetts@elmbridge.gov.uk](mailto:JMargetts@elmbridge.gov.uk)>  
**Cc:** Ian Tucker <[itucker@elmbridge.gov.uk](mailto:itucker@elmbridge.gov.uk)>  
**Subject:** RE: 2018/3810 Hampton Court Station

Hi Jenny ,

I've drafted a response to some of the points raised in the letter . What's the latest on the application ?

Thanks  
Paul

**From:** Paul Leadbeater  
**Sent:** 11 June 2021 12:13  
**To:** Jennifer Margetts <[JMargetts@elmbridge.gov.uk](mailto:JMargetts@elmbridge.gov.uk)>  
**Cc:** Ian Tucker <[itucker@elmbridge.gov.uk](mailto:itucker@elmbridge.gov.uk)>  
**Subject:** RE: 2018/3810 Hampton Court Station

Hi Jenny ,

Had a quick look , it might be an idea to get Watermans to investigate the errors suggested and update there report to confirm if this makes a difference to their results / findings. I can't imagine it will .

Thanks  
Paul

**From:** Paul Leadbeater  
**Sent:** 11 June 2021 11:19  
**To:** Jennifer Margetts <[JMargetts@elmbridge.gov.uk](mailto:JMargetts@elmbridge.gov.uk)>  
**Cc:** Ian Tucker <[itucker@elmbridge.gov.uk](mailto:itucker@elmbridge.gov.uk)>  
**Subject:** RE: 2018/3810 Hampton Court Station

Dear Jenny,

I'm doing ok thanks busy with the final push on the AQAP and an ASR report in the next few weeks so don't really have time to look at this until end of the month / beginning of July. If you need it sooner I could send you the contacts at Stantec they would provide a response but would charge you for that.

What's happening with the application not heard anything since I sent my last response on the applicants updated air quality report some months ago?

Many thanks

Paul

Paul Leadbeater | Principal EHO | Pollution  
Team

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**From:** Jennifer Margetts <[JMargetts@elmbridge.gov.uk](mailto:JMargetts@elmbridge.gov.uk)>

**Sent:** 11 June 2021 11:05

**To:** Paul Leadbeater <[pleadbeater@elmbridge.gov.uk](mailto:pleadbeater@elmbridge.gov.uk)>

**Subject:** FW: 2018/3810 Hampton Court Station

Dear Paul,

I hope you are well.

I have received the above letter from Hampton Court Rescue Campaign regarding air pollution. I would be very grateful if you could review the attached letter and provide any comments you may have as I will need to address it in the committee report.

Many thanks

**Jenny Margetts**

Team Leader (North Area) | Planning Services | Elmbridge Borough Council

Civic Centre | High Street | Esher | Surrey | KT10 9SD

Direct line: 01372 474796 | [www.elmbridge.gov.uk](http://www.elmbridge.gov.uk)

Working pattern: Tues, Wed, Thurs and Fri

**From:** Karen Liddell <>

**Sent:** 10 June 2021 12:29

**To:** Jennifer Margetts <[JMargetts@elmbridge.gov.uk](mailto:JMargetts@elmbridge.gov.uk)>; Town Planning <[tplan@elmbridge.gov.uk](mailto:tplan@elmbridge.gov.uk)>

**Cc:** 'Ray Townsend' <>; 'Caroline James' <>;

**Subject:** 2018/3810 Hampton Court Station

Dear Jenny

Please treat the attached report as a further HCRC Objection to the above application specifically on air quality.

We would be grateful if you could consult your Environmental Health Officers, or other impartial external specialist advisers, on the HCRC allegation of errors in the applicants submissions.

Additionally, can you seek and upload the Environmental Health Officers, or other advisers, response to the applicants March 2021 Air Quality Update report as it does not appear online.

HCRC looks forward to your response to our air quality concerns in your committee report.

Kind regards

Karen for HCRC