

Louise Thayre
Royal Borough of Greenwich

5 July 2015

Dear Ms Thayre

15/0973/F Revised application for the northern element of the Enderby Wharf Development comprising the erection of a cruise liner terminal building etc. Supplementary documents dated after 10 June 2015.

Further to our letter of May 15th 2015, East Greenwich Residents Association comments on supplementary documents presented by the applicant and especially on Air Quality issues.

Ships Air Emissions

The claim that air emissions from hotelling cruise vessels would be “negligible” is not substantiated in the documents. One document addresses concerns directly (“Statement of cruise ship operational environmental issues”, by TNC Ltd, 28/5/15). Yet it admits that a cruise ship with 1200 passengers would consume 700l/hour of fuel. This is the rough equivalent of 400 idling HGVs 24 hours/day for the summer months when ambient pollution is often highest. Diesel emissions are a key source of NOX and Particulate pollution. Ambient NOX pollution in East Greenwich often breaches legal limits. The documents dismiss concerns about such pollution in a dense residential area. The reiteration by the applicant that sulphur oxide emissions are not a problem is a red-herring. In fact ship diesel may still contain up to 100 times more sulphur than vehicle fuel.

On Shore Power Supply (OPS)

In the absence of evidence that the burning of diesel by hotelling vessels will not add to already dangerous levels of pollution, we call for OPS to be installed as a condition of any determination. Our Royal Borough demands the best available technology be installed from the outset. Already such OPS is standard in 26 European ports, as well as many outside Europe. The contention that only 5% of ships can use such technology is unsubstantiated.

Road Traffic

The supplementary documents also fail to adequately assess the impact of road traffic from either the cruise operations or very high density residential blocks. Borough AQ receptors at GW35, GW52, and GR5 record levels of NO2 above permissible limits. These are all on the only feasible access roads to the development. We recommend that all Travel Plans be revised to take account of this, for instance by greatly increased use of river transport.

Financial Viability Report

We have concerns that the release of the viability report in September would not give stakeholders a reasonable opportunity to test the underlying developer assumptions relating to the funding of the cruise liner terminal by the increased residential development density.

Our additional comments are supplementary to any contained in our original commentary letter. We hope to present more detailed evidence of our concerns at any Planning Board.

Emissions team
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