

15 July 2015

Dear Planning Board member,

Reference ; Land at Enderby Wharf

I write to you on behalf of the East Greenwich Residents Association (EGRA) in relation to the proposed planning board hearing of the application ref 15/0973/f (Land at Enderby Wharf) Tuesday 21st July 2015.

We have serious concerns relating to the density, height, affordable housing element, the potential impact on air quality, the quality of public realm as well as the tangible benefits for the borough's residents and businesses. We have previously communicated these concerns to both the developers' agents in our discussions with them and to the council's officers. Our most urgent concern at this time - with planning board meeting now less than a week away - is that as a planning board member, we understand that you will not have access to the independent assessment of the financial viability study, in advance of the planning board meeting. Furthermore, Greenwich council has publicly stated that it proposes to make viability studies public where developers have failed to meet its affordable housing target. This is most welcome and would indeed be applicable in this case, as the Cruise liner terminal application includes a mere 16% affordable housing, despite the RBG's own stated aim of 35%. Within the affordable housing provision the applicant is providing 37% social rent and 63% Shared ownership, again this runs counter to the London Plan policy and RBG preferred tenure split of 70:30.

We respectfully ask you, in the interests of proper procedure and transparency, to postpone your decision on this application until there has been a full review of the completed independent report on the financial viability study. The entire legitimacy of this development rests on the developer's business case and we believe the planning board should be privy to this information and fully informed when making a decision of this magnitude. The cruise liner development, which sits just outside the World Heritage site, has implications not only for the borough but for London.

As you will be aware, the changes to the consented scheme are predicated on the need for cruise ships to stay alongside for longer periods. This results in a cruise liner terminal 81% larger than that approved under the original consent. The applicant states that the financial viability of the cruise terminal can only be met by a substantial change to the commercial residential mix of the remaining northern site. This has led to major breaches of recommendations from the London Plan and the RBG Core strategy plan, particularly in relation to housing density, provision of affordable housing and family housing mix. In addition, serious issues relating to the environmental impact of the birthing of the Cruise liners has not been adequately addressed by the applicant.

The new proposals result in the loss of the commercial footprint afforded by an hotel and in its place the development of three new tower blocks of 23 stories , 31 stories and 26 stories respectively, just yards from a Victorian conservation area. The housing density of the proposed scheme is 820 hrha, the density for the site as a whole increases to 961 hrha. This is shockingly high when one considers (and as noted by the GLA within the planning document) that the wider Enderby site has in fact a PTAL 3 rating which would ordinarily only allow for residential density of between 200-450 hrha.

In addition, we ask that the planning board insist that a full air quality assessment be carried out by the applicant with detailed mitigation measures offered up for further consideration before approval can be given. In official government figures, Prof Frank Kelly of Kings College indicated that 7.2% of all deaths in Greenwich is attributable to particulate pollution*. I hope you would agree that any further development in Greenwich should not be at the expense of a deterioration in residents' health and welfare.

*<http://www.phoutcomes.info/public-health-outcomes-framework/domain/4>.

I would stress that as residents of East Greenwich, we are in favour of sustainable development throughout the borough and the regeneration of East Greenwich, but not at any price. The provisions that are made for affordable housing, housing mix, and housing density are set for a reason. Principally, to ensure sustainable development for all stakeholders, providing for a balanced and mixed community. We fear that the political imperative to build a cruise liner terminal is severely undermining the sustainability of the Enderby Wharf development. We hope that you would agree that the transgressions to the London Plan and RBG recommendations for housing density, affordable housing and housing mix are aggressive in the extreme. Even more troubling from the community perspective, is that the board is being recommended to consent to this application without having sight of the written independent review of the viability study. Here is an opportunity to set a precedent and to flag Greenwich's commitment to make viability studies public.

We hope you share our concerns and that in evaluating these plans the welfare and health of your residents, as well as the sustainable development of the borough, are prioritised over other considerations. We urge you to postpone your decision and to reject the plans as they currently stand.

Yours Sincerely

Daniel Hayes
On behalf of East Greenwich Residents Association