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Date: 13 August 2015

Boris Johnson
Mayor of London
8th Floor, City Hall

Dear Boris,

I should like you to direct refusal when you make your Stage II decision regarding the planning application to the Royal Borough of Greenwich regarding the land at Enderby Wharf (LPA reference 15/0973/F).

You last commented on an earlier version of this application February 2011 (your reference PDU/2515/02), when you were content to let the local planning authority determine the application. Since then there have been important developments which I believe should lead you to direct refusal, in particular a sizeable new cruise liner terminal.

Since your last decision in February 2011, the new London Plan (adopted in July 2011) introduced policy 7.14 requiring that 'development proposals should be at least "air quality neutral" and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).'

The Royal Borough of Greenwich has, in the intervening period, finally published more detailed research on the air quality problem in its borough. The GLA has also published a number of studies exposing the health impacts of air pollution, which are much more serious than previously thought.

The Royal Borough of Greenwich has tried to dismiss these air quality concerns by suggesting that EU regulations on the desulphurisation of bunker fuel have effectively dealt with the issue. I'd note that the SO₂ limit for the cruise ships' fuel under these regulations is still 100 times greater than that for vehicles on our roads. It is not insubstantial.

But the greater problem, now recognised by the GLA, is the NO_x pollution generated by diesel generators on the ships. You recently published research suggesting that NO_x was responsible for more premature deaths than particulate pollution, and many more than from SO₂.

As your officers noted in their submission to the Royal Borough of Greenwich, the NOx emissions from the cruise terminal were not studied as part of the environmental impact assessment. The consultants concluded that the NOx implications were negligible having only considered extra road traffic emissions (para 9.157 of the EIA). But these cruise liners carry very large diesel generators that, when berthed, I am told, can produce as much NOx as fifty idling lorries.

Until the assessment of NOx pollution incorporating the impact of the cruise terminal is carried out, the application cannot be approved. The results of the revised assessment should be tested against the policy that, in this air quality management area, the application should not lead to further deterioration of air quality. As it seems inconceivable that such a large addition of NOx to the area would not adversely affect air quality, I cannot imagine that the application can meet the requirements of Policy 7.14 of the London Plan.

Greenwich has bent over backwards to accommodate old polluting ships. In examining the potential for "cold ironing" - requiring ships to use shore-side electrical power and so potentially mitigating the NOx problem - they concluded that it would be prohibitively expensive for some operators to retrofit this technology. They also didn't adequately explore the impact of shore-side diesel generators - clearly any shore-side power source would also need to be air quality neutral.

EU directive 2012/33/EU clearly requires member states to encourage the use of shore-side electricity, and as the Localism Act has potentially made the GLA and boroughs jointly responsible with the Government for meeting our legal obligations on air quality I believe both Greenwich and the GLA need to take this option more seriously.

Just as you have shown leadership in driving forward technical innovation with strong standards for vehicles in the ULEZ, so the GLA and the Royal Borough of Greenwich ought to show similar leadership in this case. That could either mean join a growing number of cruise liner terminals around the world that are insisting on cold ironing, or it could mean rejecting the application. The message should be clear: operators will have to modify their ships or lose destinations and trade.

I look forward to reading your decision.



Jenny Jones
Baroness Jones of Moulsecoomb
Green Party Member of the London Assembly