

Mayor's Office

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Dear Nicky

Safeguarded Wharves Review

Thank you for your letter of 11 March about my Safeguarded Wharves Review.

I agree with you about the importance of safeguarding wharves to facilitate water freight transport in London helping to reduce lorry movements and therefore congestion and pollution.

The process of reviewing the currently safeguarded 50 wharves started in early 2011 with the commissioning of the mentioned URS Report. The selection and briefing of the consultants was undertaken jointly by the project team including representatives from my Planning and Environment Teams as well as representatives from Transport for London, British Waterways (now Canal and River Trust) and the PLA. The project team also scrutinised draft reports and agreed its final version as an appropriate and independent basis for the consideration of the continued safeguarding or release of individual wharves in combination with detailed site assessments for all of them.

In terms of its demand forecast for water freight trade it draws on a range of data sources including top-down elements (analysis of historic wharf trade data, macroeconomic and commodity-specific forecasts and key policy drivers) and bottom up ones (drawing on market intelligence, consultation with operators and other key stakeholders and with those responsible for major infrastructure projects) to develop three demand scenarios.

It is also important to put the demand forecast in its proper context. It is of course impossible to predict the future with complete accuracy. What the forecast of the Review seeks to do is to give an appreciation of the likely order of demand for cargo-handling wharves on the Thames over the period covered by the London Plan (to 2031), and the likely extent and direction of change in this regard. The inclusion of three different scenarios demonstrates the recognition of uncertainty with the medium scenario being considered as a pre-cautionary but not speculative approach. I am satisfied that the URS Report represents the kind of robust, proportionate evidence encouraged by the National Planning Policy Framework. It is based on an appropriate methodology and sound assumptions.

I now address the specific points you are making about future demand and wharf capacity.

The proportion of commercial and industrial waste as well as the potential of secondary material that could be transported by water were considered difficult to estimate/predict. Specifically with regards to recycling, as well as reuse and pre-treatment, the Review document explains that these 'are less likely to use the river as they are generally micro processes that will involved transport of waste from domestic and commercial premises to processing plants close to the source of the waste' (paragraph 3.3.4). It goes on to say that 'waste authorities and operators suggest that only a relatively small proportion of this waste has the potential to be exported by water to recycling centres' (paragraph 3.3.7). Whilst I agree with you on the promotion of 'green industries', the realistic potential for example in terms of green waste management to significantly contribute to future demand for waterborne freight is at least uncertain and cannot be demonstrated robustly. However, the selected medium demand scenario represents a precautionary approach that recognises the potential of 'green industries'.

The idea of an evenly spread network of small multi-cargo wharves does not appear to be realistic. In this highly urbanised city with significant pressure on waterfront sites we need to protect existing capacity where it is needed and where opportunities arise facilitate and promote consolidation/relocation to ensure the most effective use of land.

My approach to water freight on London's canals is to encourage opportunities where they arise locally. However, section 4.4 of the Review document ('challenges to viability') clearly shows the constraints to large scale transportation on the canals.

On your point that according to the URS Report only LB Hammersmith & Fulham and LB Lewisham state that they wish to reduce wharf capacity I have to point out that the Statement of Consultation demonstrates that all boroughs affected by release proposals (LB Newham, LB Barking & Dagenham, LB Havering and LB Bexley) explicitly support them.

I have already formally approved my Final Recommendation. Preparations are now underway to publish the Recommendation on my website and to submit it alongside supporting documentation to the Secretary of State for consideration and issue of the revised set of Safeguarding Directions. While I received your letter too late in the process to take it formally into account in taking this decision, I have carefully considered the points you raise to see if any of them justify taking a different view. For the reasons I have given I have come to the conclusion that they do not.

Yours ever,



Boris Johnson
Mayor of London