

London Forum response to Safeguarded Wharves Review

The London Forum of Amenity & Civic Societies, with a membership of over 100 societies across the whole of London, has played an active role in the discussion of a range of London-wide policies, including the London Plan and the Mayor's Transport Strategy. We therefore welcome the emphasis given by this Review of Safeguarded Wharves on relevant statements from these London documents, and in particular the potential for increased use of the Blue Ribbon Network to reduce road based freight. We also welcome the discussion of the reasons for such increased use, including contributions to the reduction of carbon emissions, of other local pollutants, and of road congestion – to which we would add the value that many attach to retaining working boats on the whole network as an important part of London's heritage.

Given the irreversibility of decisions to build on wharf sites, we fully agree with the view expressed in 6.3.1 that “it is appropriate to follow a precautionary principle and consider the higher scenario as the basis to assess safeguarding of wharves”. We were therefore rather surprised by, and strongly disagree with, the decision to follow URS advice (7.2.3) that safeguarding recommendations be based on the medium growth scenario forecast.

Quite separately, we also have serious concerns on the quality of the derivation of the various forecasts. Given the frequent references to issues of climate change, we would have expected, at the very least, an outline analysis of the quantitative contribution which switching from road to water might achieve. When added to the congestion benefits, this would give an indication of the appropriate level of additional long-term support for water-based freight. An even more basic problem is the sub-standard quality of too much of the detailed working through of the forecasts in chapter 3 and the subsequent link to the gap analysis tables of chapter 6 (see annex, below). A further cause for concern is the willingness to presume future government policy in so far as it relates to reluctance to provide subsidies (used as reason for scepticism towards operator optimism), without any contrasting reference to the pressure on both National and London governments to meet their very ambitious targets for reducing carbon emissions.

The review quite rightly notes the need to generate new demands for water freight. To this end, it should include a consideration of the potential for increased engagement of small businesses and community-based groups, encouraging them to come up with ideas for using both the waterways and the adjacent land. It is likely that many such uses would be locally based and smaller scale, and thus be particularly relevant to increasing the use of the canals – as would any analysis of appropriate levels of long term support or subsidy for water-based freight. We therefore strongly support efforts to ensure that relevant boroughs recognise, and follow through, potential opportunities for using canals to help achieve modal shift.

ANNEX. Detailed comments

In what follows, T (eg, T3.1) indicates Table and F indicates Figure. Other numbers refer to section or paragraph.

Chapter 3

Forecasting demand for waterborne freight is clearly a difficult and complex task, so the general strategy of trying to bring together a number of different approaches seems fully appropriate. However, there are a range of flaws – methodological; failure to adequately link values through various stages; failure to indicate the basis for some of the forecasts; and a range of apparent typos and data inconsistencies – the combination of which seriously undermine the credibility of the of the resulting forecasts.

T3.1. No units are given; % change in vehicles should be +6% ; and to reflect a total change in petroleum products of 4514% during the 5-year (not 4-year) period 2005-10, the CARG should be 40.7%.

3.1.4 Especially given the indication that 2011 trade has significantly increased, the trade in construction materials has been broadly constant since 2004. Whether the 2001-04 decline is part of something long-term depends on what was happening prior to 2001.

T3.4 & 3.5. Nothing is gained by repeating two rows from T3.5 in a separate T3.4 (especially as the totals in T3.4 make no sense) – the separate discussion of construction and waste can simply refer to T3.5 which will in any case be adjacent for easy reference. However, having two charts could be very useful if F3.5 omitted construction and waste, thus allowing use of a scale which enabled the other series to be visually separated.

The 2001 value for vehicles in F5.3 appears to differ substantially from that in T3.5.

I assume that any goods separately handled by 2 different wharves (most obviously in T3.2) are counted twice. It would be helpful to confirm this (especially given the comment in 6.2.2 that double counting should be avoided – see below), along with the fact that T3.5 is the sum of T3.2 & T3.3.

3.1.12 Especially given the indication (3.1.4) that 2011 volume may be back to 2008 levels, it is simply not acceptable on the basis of this data to describe the decline in construction materials as “relatively consistent”, and hence (without further back data and some more detailed analysis) to conclude that the decline is likely to be structural.

3.2 It is wholly inappropriate, and can be seriously misleading, to use correlation coefficients to examine or describe the relation between 2 series over just 6 or 7 years of annual data. The nature of any relationship can be far better appreciated from a simple chart, as in F3.10, to which a correlation coefficient adds nothing (apart from confusion and a spurious sense of precision).

This misuse of correlation may be even worse, since examination of F3.10 strongly suggests that the correlation coefficient (r) in 3.2.9 has been wrongly calculated. If the DFT forecast is constant then r is undefined (numerically, the formula would give $r = 0/0$), whilst if it had a roughly constant negative trend, and estimating Historic Trade values from the chart (since they do not seem to correspond to anything in previous tables) gives $r \approx 0.85$. A positive trend would give $r \approx -0.85$. This must raise doubts about the other stated values of r .

It would be helpful if any charts used to compare employment forecasts with actual wharf trade (3.2.5) also included actual employment data, thus also enabling separate consideration of the two links in the chain between forecast employment and actual trade – namely, between forecast and actual employment, and between actual employment and actual trade. In using forecasts, it is also essential to state the dates at which the forecasts were made (presumably not the same as the quoted date of publication, which in any case sometimes differs between text and table!).

3.3 It seems sensible to use the figures from the Draft Mayor’s Waste Strategy, although there should be some brief comment on the basis on which they were derived (or if no basis given, say so). In T3.9, change in mass burn incineration should be – 11%; whilst 3.3.3 should more accurately read “...whilst recycling is expected to grow by 62% between 2014 and 2030, when it would form approximately half of waste processed in the GLA.” In T3.14, the units should be million tonnes.

3.4 There is need for a brief note on the relation between construction materials data and aggregates data. 3.4.1 refers to 2005 forecasts shown in T3.15, but the table only refers to 2010. 3.4.2 refers to MPG6 targets not being met – targets for what? T3.16 – T3.19 have no units, and row headings that make no sense (since when has “annual average” been a region?). In 3.4.10, it should be “...i.e the same values are repeated.” Continuing the trend would (for the low scenario) imply further decline.

Whilst Construction Materials is by far the largest category, in 2010 both Sugar and Vehicles have a higher tonnage than Waste, yet there is no discussion of the basis of forecasts for these two categories.

For Vehicles this omission is compounded by the statements in tables 3.22-4 that the basis is “Historic trend”, when this is clearly not the case. Thus in T3.5, the historic CAGR is (correctly) stated as –1%, whereas calculating the CAGR for 2011 – 2031 from the forecast tables gives a massively different figure of around –9% for all scenarios. The footnotes (20, 21, 23) only add to the mystery.

Other detailed comments

T6.3 – T6.5. My understanding of the adjustments described in 6.2.2 is that the totals in T6.3–T6.5 can be obtained from the corresponding totals in tables T3.22–T3.24 by adding first 10%, then 0.6mt for transshipment, and finally 0.2mt (for the medium scenario), 0.4mt (high) and 0.1mt (low) for supra-regional demand. Thus, taking 2021 high scenario as an example, the total in T3.24 is 13,775,662; adding 10% gives 15,153,228; and adding 1,000,000 gives 16,153,228. However, the corresponding figure in T6.4 is 15.4mt. Even allowing for rounding errors, there is clearly a substantial discrepancy.

In terms of the adjustments themselves, it would be less confusing, and more in keeping with normal practice, if the allowance for frictional vacancy were made by adjusting down the capacity by 10%, to give “effective capacity”, rather than artificially increasing demand. And surely, since we are concerned with wharf capacity rather than tonnage transported, we should be double counting in the total since the waste is handled twice, in two separate wharves, so that there should be no deduction of 0.6mt from the final total.

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