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12 January 2010

Dear Mayor of London

Tower Hamlets Council Comments on the Mayor of London's Draft Transport Strategy published October 2009

Tower Hamlets Council welcomes the opportunity to comment on the Mayor of London's draft Transport Strategy (MTS2).

The Tower Hamlets Council comments and proposals have been prepared into two parts. This **covering letter** outlines our key transport priorities while the **accompanying tables** provide a detailed response to the proposals outlined in the draft MTS2.

Tower Hamlets is set for a large population growth which will place ever greater strain on the transport networks that serve our diverse communities.

In partnership with Transport for London, we will strive to deliver an accessible, efficient, high quality and sustainable transport system for all who live, work and visit Tower Hamlets.

Tower Hamlets Council Officers priorities for the transport system, outlined below, are where the focus of stakeholders energies and investment should be placed to meet the challenges in the short, medium and long term. These are:

1) Providing better access

- Enhancing the physical accessibility of the transport system
- Improving the safety of pedestrians and road and public transport users
- Offering affordable fare levels on all services

2) Connecting communities & places

- Implementing local schemes to encourage walking and cycling
- Delivering Hackney Wick and Bromley-by-Bow stations interchange improvements
- Improving local connections to public transport interchanges

3) Promoting sustainable travel

- Reducing carbon emissions from transport
- Promoting freight by rail and water
- Developing Tower Hamlets as an 'Electric Vehicle Borough'
- Improving air quality by reducing car dependent lifestyles
- Opposing further expansion of London City Airport

The achievement of many of our strategic, sustainable transport priorities will be facilitated by the addition of new transport infrastructure. These are schemes that Tower Hamlets Council officers consider to have fundamental value in working towards a world-class transport system. These schemes are:

4) Delivering new strategic transport infrastructure

- TfL London Cycle Hire Scheme expansion across Tower Hamlets
- TfL Cycle Superhighways
- East London river crossings for cyclists and pedestrians between the Isle of Dogs and Rotherhithe and the Isle of Dogs and North Greenwich
- Crossrail 2 with an interchange hub at Hackney Wick station
- Electric vehicle charging infrastructure.

If you require further clarification on any of the points raised in this **letter and accompanying tables**, please do not hesitate to contact Jack Ettlinger, Strategic Transport Planner, on telephone: 020 7364 2542 or email: jack.ettlinger@towerhamlets.gov.uk.

Thank you for your attention.

Yours sincerely



Richard Finch
Strategic Transport Team Leader

LBTH Response to Proposals in the Mayor of London's draft MTS2

Managing and enhancing the transport system

MTS2 Sub section	MTS2 Page	MTS2 Key Proposals	LBTH Comments and Proposals
1) National Rail, Crossrail, Overground, DLR, Tramlink	109-110	<u>International Rail</u> Encourage wider range of international services, some of which to stop at Stratford.	LBTH would like to work with TfL to encourage operators to have all inbound and outbound HS1 international services call at Stratford. This will reduce journey times between east London and the continent by removing the need to travel through central London.
	111	<u>National Rail</u> HS2 terminus to be centrally located with Euston currently the preferred option.	LBTH is strongly supportive of HS2 to support economic growth and modal switch from air to rail. We believe consideration should be given to connecting HS2 to HS1 at Stratford International to allow through services from the rest of Britain to east London and continental Europe. A similar high speed rail 'bypass' (inter-connector) around Paris (Ile-de-France) region has been constructed to facilitate TGV/other high-speed services that circumvent Paris.

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	112-126	<p><u>Regional Rail</u> Crossrail 1 delivered and integrated into London's transport system by 2017. Crossrail 2 (Hackney-Chelsea line): Supports new capacity in the southwest to northeast corridor</p>	<p>LBTH will continue to work with TfL, Crossrail and other stakeholders to ensure the delivery of Crossrail 1 is to the maximum benefit of our diverse communities. However, LBTH strongly considers that funding for this and other public transport infrastructure schemes are not at the expense of local section 106 funding priorities.</p> <p>LBTH supports the proposal for the Crossrail 2 (Hackney-Chelsea line) scheme. However, we would wish to be consulted at an early stage on the Crossrail 2 alignment at the north eastern end of the proposed line and on the funding mechanism.</p> <p>We request that TfL consider an interchange at Hackney Wick station on the Crossrail 2 route to improve accessibility aid the regeneration of Fish Island area adjacent to the station.</p> <p>The delivery of a brand new Crossrail 2 line presents an ideal opportunity to construct this line to continental loading-gauge standards in order to allow the operation of double-decker trains to maximise its passenger carrying capacity.</p>
	126-129	<p><u>Sub Regional Rail</u> DLR extensions London-Tilbury line capacity enhancement.</p>	<p>We are broadly supportive of extensions to the DLR. This is provided the additional demand generated by increasing the size of the network could be adequately met and would not adversely impact on existing passengers and service levels.</p>

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2) Underground	129-138	New sub surface line trains from 2010. New signalling and line upgrade to be completed by 2015.	<p>We welcome the sub surface capacity upgrade which is vital to improve journey conditions for existing passengers and accommodate the increase in users arising from the large population growth expected in LBTH and beyond.</p> <p>Tower Hamlets Council strongly encourages step free access schemes at all stations in the borough. We believe Aldgate East, Mile End, Stepney Green and Bow Road are strong candidates for funding for step free schemes as all are sub surface stations and could offer cost effective returns compared to deeper-level stations.</p> <p>We welcome the Underground extensions proposed in the draft MTS2, including those to the Bakerloo and Northern lines in south London. In addition to these schemes, LBTH would like to work with TfL and our other partners supporting the regeneration of our borough on the feasibility of constructing a Central line or sub-surface line link to Hackney Wick station, either as a spur or as part of a larger LUL extension into east London.</p>

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3) Bus network	139-143	<ul style="list-style-type: none"> • Keep development of bus network 'under review' • Incentivised bus operating contracts • Implement Countdown 2 • Upgrade fleet to higher emissions standards • Roll out of 'new bus for London' 	<p>LBTH welcomes measures to make the use of bus more attractive, including the improved i-bus Countdown facility, and urges TfL to procure a bus fleet that meets the highest emissions standards, such as electric/trolley-buses.</p> <p>Although through such measures as low floor buses the accessibility on the bus network has improved, there are still barriers to its use. Investment in infrastructure is required at many bus stops to improve physical accessibility on the network with most inaccessible to be prioritised for investment. Developer contributions should be sought to provide on-street bus infrastructure that meets the highest standards of safety, comfort and accessibility.</p> <p>LBTH is concerned that the 'new bus for London' project will divert funds that could provide better value for the bus network through investment in enhancing the existing service, capacity and fleet. However, we would like to see more space allocated for wheelchair users and buggies and believe the 'new bus for London' presents a good opportunity for this to be trialled.</p> <p>We are aware that TfL is planning a phased removal of articulated buses. We are concerned that the impact of this on the strategically important route 25 (Oxford Circus-Ilford), one of the most heavily used services in London, would be a deterioration of service.</p> <p>There is a capacity issue on many key radial bus services in London, including the 25, 38 and 73. This could be tackled by the phased introduction of a TfL London tram network, eventually linking central, inner and outer London together within the life of MTS2 and a future MTS3.</p>

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4) Taxis, private hire, coaches, community transport	144-147	<ul style="list-style-type: none"> • Continued highway priority for taxis • Provision of ranks and facilities at interchanges • Coach hubs across London 	<p>Taxis can provide an accessible and safe service but with around 70,000 taxis and private hire vehicles operating in London it is important that TfL promotes take up of low carbon vehicles across the black cab and private hire fleets.</p> <p>We consider that taxi space at interchanges in the borough should be limited in scale and not at the expense of public transport, cycling and walking connections and facilities. We would prefer taxi ranks at interchanges in LBTH to be combined with limited, short stay, drop-off areas.</p>
5) Managing the road network	148-155	Smoothing of traffic, prioritise measures that improve reliability to journey times	<p>Traffic smoothing measures should only be instigated if it can be proven that pedestrian and cyclist priority and safety are not compromised.</p> <p>Improved journey time reliability should not be at the expense of reasonable journey times for those who walk, cycle and/or use public transport.</p> <p>Investment in sophisticated traffic management systems and other traffic smoothing measures that increase road capacity may release suppressed demand for car travel. Rather than alleviating congestion, this would simply increase the volume of traffic on London's roads, leading to increased carbon emissions, air pollution and noise pollution.</p>

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5) Managing the road network	152	Trial allowing motorcycles and scooters to use TLRN bus lanes	<p>LBTH would be interested to see the results of this motorcycle bus lane trial as we would want to ensure that bus services and cycle trips are not negatively impacted by an increase in vehicles using bus lanes and that the scheme is not detrimental to motorcyclist safety.</p> <p>LBTH is also concerned that this scheme could create a source of conflict for vulnerable road users as motorcycles have greater acceleration than conventional cycles.</p>
	152	Pilot of pedestrian countdown at traffic signals	<p>Whilst we welcome innovative schemes to improve the operation of signalised crossings, emphasis of junction upgrades should be on improving road safety for pedestrians and cyclists.</p>
6) The Blue Ribbon Network	156-160	<ul style="list-style-type: none"> • Development and integration of river services. • Increased pier capacity • Increased use for freight 	<p>LBTH welcomes the recent introduction of Oyster card capabilities on river services but has reservations over the current river service fare levels which are prohibitive to many people wanting to use this useful service.</p> <p>We would like to be engaged in proposals for enhanced river services and discussions on the scope for and funding of new pier capacity. Namely the proposed pier upgrade at Canary Wharf and a new Wood Wharf pier that would provide for a new ferry crossing between Wood Wharf and North Greenwich.</p> <p>We have also been in discussions with local business on the potential to use the Limehouse Cut, Regents Canal and other waterways in east London to provide an Eastend waterbus service. Such services could link with the waterways network in other parts of London.</p>

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7) Airports	173-174	<ul style="list-style-type: none"> • Addition of runway capacity 'critical' • Opposed to Heathrow expansion. • Operators should meet the cost of enhancing access to enlarged airports. 	<p>Tower Hamlets Council passed a motion on 09-12-09 strongly opposing any further expansion to London City Airport on environmental health and sustainability grounds.</p> <p>LBTH would also oppose any increase to runway capacity in London. Growth in aviation will increase CO2 emissions from the transport sector and have negative noise impacts for residents across London.</p> <p>HS2 offers the potential for demand for domestic and short haul European flights to switch to high speed rail in a similar fashion to the impact of the Madrid-Barcelona RENFE high speed rail line that now carries 46% of all passenger traffic between these two cities. The mode switch may be augmented by new services on HS1, such as those from London to Cologne proposed by Deutsche Bahn.</p>
8) River crossings	161-163	<ul style="list-style-type: none"> • Road link at Silvertown, • Upgraded Woolwich Ferry, • Local pedestrian and cycle links in Isle of Dogs • Gallions Reach-ferry/fixed link 	<p>LBTH welcomes proposals to enhance connectivity between East and South East London, particularly the proposed pedestrian and cycle links as we have been working with Sustrans on a scheme for a fixed crossing between Isle of Dogs and Rotherhithe that could transform connectivity in the area.</p> <p>We have strong concerns that schemes such as the Silvertown road river crossing could increase overall traffic levels in east London and have unacceptable noise and air quality impacts on this borough along the A12.</p>

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9) A more accessible transport system	164-168	<ul style="list-style-type: none"> • Improve physical accessibility at strategic interchange and town centres • Enhance information provision • More staff available to assist customers 	<p>We would also like to see a stronger commitment to a step free network in MTS2.</p> <p>LBTH welcomes the improvement in accessibility of the transport system that Crossrail 1 will bring. We agree that more staff with appropriate training should be on hand to offer support to people who have difficulties using stations. This support should be available to passengers at all stations on the network.</p>

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10) Integrating London's transport system and services	169-172	<ul style="list-style-type: none"> • Improve physical accessibility and customer experience at interchanges. • Prioritise improvements that will enhance orbital travel, reduce need to travel through central London and accommodate population and employment growth. 	<p>Emphasis on the importance of improvements to the accessibility of interchanges in MTS2 is certainly a positive measure. LBTH agrees with the need to enhance walking and cycling connections and facilities at all stations and this is supported by proposals in our emerging LDF Core Strategy.</p> <p>While LBTH understands the rationale for enhancing interchanges on orbital routes it does not believe it should be at the expense of those on radial routes which continue to be the most congested.</p> <p>There are a number of interchanges in LBTH not specifically mentioned in the draft MTS2 that we believe require investment:</p> <ul style="list-style-type: none"> • We are working with LTGDC on a station feasibility study to improve the capacity and accessibility at Bromley-by-Bow. These improvements are required to support the substantial redevelopment planned for the area. The support of the Mayor and TfL will be important to deliver these regeneration improvements. • Mile End is one of busiest stations outside zone 1. Investment is required to improve bus and cycling links around the LUL interchange. • At Limehouse, the station environment is poor as are the National Rail and DLR station connections to bus services. Investment at this key interchange would reduce the need to travel through central London as well as improve the quality of the local environs. • Bethnal Green and Cambridge Heath National Rail stations also require investment to improve their station environments, accessibility and interchange facilities to bus services.

Encouraging more cycling and walking

MTS2 Sub section	MTS2 Page	MTS2 Key Proposals	LBTH Comments and Proposals
11) Cycling Revolution	175-182	<ul style="list-style-type: none"> • 5% modal share by 2026 • Biking Boroughs with cycling hubs are promotion of cycling • London Cycle Hire Scheme • Cycle superhighways • Increase cycle parking (66,000 new by 2012) • Development to provide cycling spaces and close to attractors to make cycling more viable 	<p>LBTH fully supports the 'cyclisation' of London to promote less car dependent, healthier lifestyles, reduce CO2 emissions and improve air quality. We have recently produced a 10 year plan to encourage cycling in the borough, 'Cycling Connections' – refer to http://www.towerhamlets.gov.uk/lqsl/501-550/539_cycle_lanes_and_routes/cycling_connections_strategy.aspx</p> <p>We are looking forward to the opening of the TfL London Cycle Hire scheme in fare zone 1 and would welcome an early extension of this important scheme across the borough.</p> <p>We welcome the introduction of the TfL Cycle Superhighways initiative but have serious concerns about the routing of the pilot Cycle Superhighway along Cable Street and wish to resolve this issue with TfL.</p> <p>We also consider that design measures to assure cyclist safety and confidence to and maximise use of the routes should be incorporated into the overall TfL Cycle Superhighways design concept.</p>
12) Make Walking Count	183-184	<ul style="list-style-type: none"> • Improving access and safety around stations • Improved wayfinding • Supporting high street revitalisation 	<p>Encouraging walking and the walking environment forms part of LBTH's Sustainable Transport Strategy (2008-2033) - refer to: www.towerhamlets.gov.uk/makingconnections.</p> <p>We will also be developing a new 10 year walking plan to increase the number of walking trips made by people in the borough.</p>

Improving Safety and security

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13) Improving public transport safety	186-187	Reduce injury and fatality rates on public transport	LBTH welcomes proposals to achieve this important objective.
14) Improving Road Safety	187-195	Will work to national targets set out in 2010.	Through the Road Safety Plan, LBTH has recently reviewed accident patterns and trends in the borough and identified a number of key issues. LBTH is concerned at the lack of proactive action on the TLRN to address road safety hotspots and wishes to see more emphasis placed on tackling design issues identified in the growing number of accidents occurring on this network. TfL need to demonstrate a commitment to reducing accidents on the TLRN in every borough, and not use London wide statistics to backup their performance figures.
15) Reducing crime, fear of crime and antisocial behaviour	196-201	Establish community safety partnerships for transport. Target priority crimes and locations. Design out crime on new and existing transport infrastructure.	As crime and fear of crime on public transport acts as a barrier to many people and increases social exclusion, we welcome measures to tackle this issue and will work with TfL to deliver improvements with the local Community Safety teams. LBTH would like to be consulted on the methodology to determine the priority times and locations where people feel most at risk.

Improving London's Environment

MTS2 Sub section	MTS2 Page	MTS2 Key Proposals	LBTH Comments and Proposals
16) Creating better streets	202-207	<ul style="list-style-type: none"> • Use 'Better Streets' Principles to improve town centres • Encouragement of shared space schemes 	<p>LBTH supports the idea of reducing the dominance of the car on streets to create a safer, more pleasant environment for sustainable mode users and mobility impaired people. We welcome the ongoing support of TfL and Design for London in development of the High Street 2012 initiative.</p> <p>The issue of severance of communities from services caused by large road infrastructure, including the A12 and Aspen Way, is of serious concern to the Council. LBTH has carried out studies seeking ways to overcome severance and we would welcome collaboration with TfL to tackle the problem further.</p> <p>LBTH is planning to trial many urban realm improvement measures as part of an emerging Clear Zone Plan. The Clear Zone will cover an area in the west of the borough (fare zone 1 + Whitechapel) and will receive a package of measures aimed at promoting sustainable transport over the short, medium and long term to improve air quality, reduce CO2 emissions and improve the urban environment. We are working with the Central London Clear Zone Partnership to take this important work forward and look forward to engaging with TfL to assist in delivery of Tower Hamlets Council's Clear Zone Plan.</p>

MTS2 Sub section	MTS2 Page	MTS2 Key Proposals	LBTH Comments and Proposals
17) Improving noise impacts	208-210	<ul style="list-style-type: none"> • Will target areas significantly affected by traffic noise • Encourage freight industry to operate quieter vehicles 	<p>Whilst many of the measures suggested in the draft MTS2 may help to mitigate noise from transport, policies that significantly reduce motor vehicle use may be the more effective as well as having many other environmental benefits.</p> <p>Many of the measures proposed to be implemented in the emerging Tower Hamlets Council's Clear Zone Plan, such as the increased use of electric vehicles, could help to reduce the impact of noise.</p> <p>We are encouraged that Mayor of London wishes to coordinate flight paths with the CAA/DfT in order to minimise noise impacts. LBTH has made a series of robust representations to Newham Council on the on behalf of local residents who are opposing the proposed expansion of LCA on noise and environmental grounds. .</p>
18) Enhancing transport's contribution to the natural environment	210-211	Use open spaces across transport system to improve the natural environment.	We welcome proposals to improve the public realm by greening the streets and fostering greater biodiversity.

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19) Improving air quality	212-219	Promotion of: <ul style="list-style-type: none"> • Car clubs • Car sharing • Electric vehicles • Cleaner buses and taxis • Targeted local 'hotspots' • Deferral of LEZ phase three from 2010 to 2012 • Local LEZ 	<p>LBTH suffers poor air quality in many parts of the borough with vehicle emissions being a major contributor. We are proactive in improving air quality and are working to install electric vehicle charging infrastructure as part of our 'EV Borough' initiative.</p> <p>We welcome the opportunity of working with TfL to help take forward our EV Borough objectives and the Mayor of London's EV Delivery Plan.</p> <p>A Clear Zone Plan, linked with our revised Air Quality Management Action Plan, is being developed to tackle the air quality issues in the west of the borough and we are involved in the emerging 4 year TfL EU EVA project, using our public service fleet to trial electric vehicles and related charging infrastructure.</p> <p>We are concerned that deferral of TfL's LEZ phase 3 will work against many of the positive measures described above.</p>

Reducing transport's contribution to climate change and improving its resilience

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20) Reducing CO2 emissions	221-231	<ul style="list-style-type: none"> • 60% reduction in CO2 by 2025 from 1990 levels: • Improved operational efficiency • Development and use of low carbon vehicles • Carbon efficient travel behaviour 	<p>LBTH welcomes the 2025 target for reducing CO2 emissions from the transport sector and is supportive of the majority of the measures in the MTS2 to work towards these CO2 reduction targets. The estimates provided in document indicate that by far the largest contribution to the savings in CO2 will come from improved vehicle efficiency - namely electric vehicles. LBTH is working with TfL and stakeholders to install charging points across the borough. We feel that TfL should lead a pan-London EV charging network to develop a uniform standard of EV charging points across London – using the TfL London Cycle Hire scheme a 'delivery-template'.</p> <p>The draft MTS2 also mentions that much of the additional energy supply required to charge EVs could be met without additional electricity generating capacity if most charging took place at night. We would be keen to work with TfL to receive guidance on charging locations and measures and for green, renewable electricity to be used for a pan-London TfL EV charging network.</p> <p>It is acknowledged in the draft MTS2 that there is a 'policy gap' between the CO2 reduction targets and the draft strategy's measures to meet them. There are many measures throughout the draft MTS2 to promote sustainable modes but there is little to restrict car use - the main contributor of CO2 emissions from the transport sector.</p> <p>LBTH considers that demand management tools, such as road user charging, are required to deliver effective and large reductions in CO2 emissions and to provide a future ringfenced funding stream for new strategic public transport infrastructure, such as Crossrail 2, Underground and DLR extensions and a new TfL London tram network.</p>

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21) Resilience of transport system to climate change	233-235	<ul style="list-style-type: none"> • Adapt public transport infrastructure to cope with severe weather conditions • New infrastructure to meets new standards • 2m new trees planted by 2025 	LBTH supports the Mayor of London's draft MTS2 plans to safeguard the public transport system against severe and changing weather conditions. Planting of new trees, reduction of hard surfaces and encouraging sustainable urban drainage would support this aim while also helping to improve London's public realm.

Managing Demand for Travel

MTS2 Sub section	MTS2 Page	MTS2 Key Proposals	LBTH Comments and Proposals
22) Better journey planning and information	237	<ul style="list-style-type: none"> • Upgrade and enhance of web based information tools • Raising customer awareness of services 	<ul style="list-style-type: none"> • Information tools can be very useful for efficient journey planning, particularly online and via mobile telephones. However, many socially excluded groups have poor access to the internet. We would like to see commitment for targeting areas of low internet availability with appropriate alternative information forms.
23) Smarter transport for both people and freight	238-243	<ul style="list-style-type: none"> • Promote initiatives for more efficient and sustainable use of transport system • Supports rail freight terminals and break bulk centres 	<p>LBTH has implemented many 'smarter choice' measures, including our 10 year cycling plan, school travel plans, car clubs and invested in the new Meath Gardens walking and cycling bridge.</p> <p>Road freight transport can be particularly noisy and polluting and its impacts are forecast to grow significantly in the future. LBTH supports the increased use of rail and waterways for freight. However, we would like to see financial incentives to support this investment in such infrastructure.</p> <p>LBTH currently chairs the TfL-Thames Gateway Freight Quality Partnership and consider this a useful forum for TfL, local councils and freight operators, to exchange good practice and information. We would welcome the continuation of this key sub-regional FQP work.</p>

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24) Fares and ticketing	244-245	<ul style="list-style-type: none"> • Fares will provide an appropriate level of funding to the cost of public transport • Explore new technologies for ticketing 	<p>Whilst LBTH recognises the economic downturn has seen a reduction in passenger numbers and thus fare revenue, we are concerned about year-on-year fare increases on our diverse communities.</p> <p>We also have concerns on the impact of relatively high cost fares on the local community where boroughs are dissected by fare zones and short journeys can therefore involve travelling across multiple fare zones. TfL should consider introducing special local tariffs to counter this problem.</p> <p>We strongly value the continued availability of the freedom pass and would support the extension of concessionary fares for job seekers to all TfL services.</p>
25) Parking and loading	246-248	<ul style="list-style-type: none"> • Pricing based on vehicle emissions • Incentives for electric vehicles 	<p>LBTH already operates a permit charge system based on emissions but will consider means to further encourage a switch from fossil fuelled cars to electric vehicles as part of our car parking charges' framework.</p>