



STRATEGIC AVIATION SPECIAL INTEREST GROUP  
of the Local Government Association

## **SASIG RESPONSE TO THE EUROPEAN COMMISSION STRATEGY CONSULTATION**

### **'A SUSTAINABLE FUTURE FOR TRANSPORT. TOWARDS AN INTEGRATED, TECHNOLOGY-LED AND USER-FRIENDLY SYSTEM'**

#### **Introduction**

- 1 The Strategic Aviation Special Interest Group (SASIG) of the Local Government Association is a national group of 51 Local Authorities across England, representing around 14 million people – more than a quarter of the population of England.
- 2 SASIG seeks to ensure that any national aviation strategy for the UK is implemented through regional planning guidance and other planning processes so as to reconcile economic, social and environmental issues in a sustainable way.
- 3 SASIG's 'Policy Principles' are enclosed with this consultation response.
- 4 This response is being made on behalf of the membership, in accordance with the group's policy principles, having been considered and approved by the SASIG Chairman's Advisory Group.

#### **SASIG's key recommendations**

- 5 SASIG's key recommendations for the Commission are that:
  - The long-term sustainability of transport infrastructure must be assessed to ensure that appropriate finance, technological adaptation and training can be put in place. A strategy looking at least 30 years ahead is key to achieving this. Such a strategy needs to be flexible enough to adapt to a changing climate, economic pressures and population patterns.
  - The 'polluter pays' principle should be applied, so transport users pay the full spectrum of the environmental, social and economic costs of their journeys. Including an investigation of the impacts of subsidies and taxation is an excellent method to internalise costs reflecting all impacts. Long-term future investment needs to be in low-carbon infrastructure, taking a holistic life-cycle assessment approach to deciding between options.
  - Integration of modes within and between countries is to be supported to increase accessibility and improve environmental performance. Knowledge sharing between Member States with established inter-modal links will help other Member States with the process of planning and optimising networks.

#### **Infrastructure**

- 6 Ensuring integration between different modes of transport is key to improving the uptake of sustainable mass transit solutions.
- 7 Integration of transport infrastructure with social facilities and housing is another key element of sustainability that can only be achieved through strategic planning. The practical application of this approach in the UK has not always been as thorough as it

should have been, and the Commission's support for this approach could be instrumental to improving on this record.

- 8 The UK's current aviation network is based around a 'hub and spoke' model, where London Heathrow receives the majority of international and transfer passengers, and regional airports provide links to London airports and short- to medium-haul point-to-point international journeys.
- 9 There is currently a single high-speed rail service in the UK, linking the East of London to the continent. Plans for expansion of the high-speed rail network in the UK are under discussion at present.
- 10 An investigation of whether a high-speed rail network would be more socially, environmentally and economically sustainable by linking population centres, or by linking transport - and in particular, aviation - hubs, would be useful.

### **Funding and pricing**

- 11 Pricing transport to encourage sustainable choices is a valuable way to influence behavioural change. The 'polluter pays' and 'user pays' principles, covering all the environmental, social and economic costs of transport use, need to be embedded in the pricing structure too. The end product must, however, be economically within reach for all sectors of society, meaning subsidies will be required.
- 12 A source of funding should be the revenues collected on the basis of the environmental impacts of transport. Ring-fencing of such funds will be required to achieve this.
- 13 Member States have no doubt made significant cuts in public funding as a result of the economic downturn. The Commission should facilitate and prioritise funding for long-term sustainable infrastructure.

### **Technology**

- 14 Increasing activity levels now overshadow the rate of technological improvements in aviation. The near-future technological gains are minimal but are being heavily relied upon to solve the problem of increased pollution as a result of increased provision based on increased forecast demand.
- 15 Many environmental interactions occur in absolute rather than relative terms, i.e. a given quantity of carbon dioxide will produce a related reaction in the atmosphere. Where technological improvements are being proposed as the justification for increases in capacity, clear demonstration of how the technology would result in absolute, not relative, reductions in emissions is necessary in the current carbon-constrained situation in order to inform option selection.
- 16 The extent to which technological developments inform planning and policy decisions should be based on a life-cycle analysis of each innovation. The potential for uptake across the transport system, affordability, time taken to roll out new technologies, and retrofitting, will also need to be considered before the genuine benefits of any technology can be assessed. The Commission should provide support to 'pilot' projects, in order to inform assessment of scheme viability for broader use.

## **Legislative framework**

- 17 International aviation legislation needs strengthening in order to provide for long-term sustainability. The Commission should seek to bring about binding international agreements that emphasise a net reduction in emissions.
- 18 The legislative framework should be based on acceptable thresholds, to address the complex interactions between the positive and negative impacts of transport.

## **Behaviour**

- 19 Modifying the behaviour of transport users needs to address the three fundamental elements of travel choice – time, cost and convenience.
- 20 With reference to aviation, the time needed for security checks at airports has an impact on service users. The rapid increase in the number of flights taken between, within, and to and from EU territories since 2001 can be largely attributed to the rise of low-cost carriers. The ability to fly direct to the desired destination from a local airport provides for convenient use of air transport.

## **Co-ordinated action**

- 21 Co-ordinated action by Member States on innovative transport solutions such as the Single European Sky initiative (intended to organise airspace and air navigation at a European rather than at a local level), international high-speed rail linkages and the roll-out of improved port facilities for freight operations, are key to achieving long-term sustainability, improved trade links and increased connectivity.
- 22 Co-ordination within each State is also necessary to address the full range of demands being placed on land-use, to achieve the optimum mix of provision across the board – housing, transport, open space, commercial, industrial, retail, etc.
- 23 Co-ordinated action is also required to ensure that each Member States' taxation system does not lead to inequity between States.
- 24 The EC should use the success of the initiatives within the Community to push for a greater uptake of such measures on an international level. Where Member States have made significant progress in delivering innovative transport solutions in line with the goals outlined in the Communication, the Commission should draw together best practice and disseminate this among Member States.

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## SASIG POLICY PRINCIPLES

- (i) To give the people of the UK the social and business opportunities to travel from their nearest airport where feasible.
- (ii) To capture, not stifle, the social and economic benefits of aviation using robust and objective evidence.
- (iii) To direct aviation growth to locations where it will assist sustainable economic regeneration.
- (iv) To minimise adverse impacts – social, economic and environmental – by protecting people and non-transferable habitats.
- (v) To ensure that the air transport sector rather than local communities pays the full costs of the impact of all air journeys.
- (vi) To offer the aviation industry tough but realistic parameters based upon associated impacts around which to secure growth.
- (vii) To ensure that good quality surface access links are provided to airports, particularly public transport links that create integrated transport hubs.
- (viii) To promote better point-to-point air services from regional airports, with sensitive control over all impacts.
- (ix) To cap the existing London Airports at the capacity of the existing number of runways, with careful controls imposed so as to reduce the adverse impacts over time.
- (x) To consider the concept of a new 24-hour airport in the South East, where it would have minimal impact on local communities.
- (xi) To support the coordination and integration of the full spectrum of national policies on issues relating to aviation. This must accord with international and regional policy-making and implementation.
- (xii) To promote investigation of the impacts of the air freight industry, supporting the development of air freight infrastructure where it is the most appropriate mode.
- (xiii) To encourage Governments and the aviation industry to make greater efforts to reduce aviation's impacts on climate change.

### **SASIG strongly urge that Government address the need for a new national aviation policy that:**

- Is based on the need to control the impacts rather than the aviation activity.
- Has considered in detail all options for providing capacity to meet forecast demand, and for providing for other, lower levels of demand.
- Embraces the concept of integrated transport provision.
- Audits the parameters that should be used in any forecasts of future demand.
- Adopts an assessment process for aviation developments that explicitly includes all associated costs.
- Sets effective environmental limits for the aviation industry to meet, taking the appropriate form – regulation, charges, taxes, etc.
- Considers and mitigates against the impact of greenhouse gas emissions.
- Develops the economic analysis of aviation, and in particular improves valuation of the net impact – benefits and disbenefits.
- Co-ordinates with other transport policies and with other associated national policies, such as climate change, and energy policies.