

Question 1: The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.

Kent County Council (KCC) recognises that growth in the UK aviation sector will improve the country's connectivity and competitiveness, thereby supporting economic growth and the creation of jobs. We were pleased when the Government announced Heathrow as the preferred location for an additional runway, culminating in the production of the draft Airports National Policy Statement (NPS). The Department for Transport (DfT) demand forecasts, presented as part of the Airports Commission, demonstrated that under all scenarios a sustained increase in demand will eventually result in the London airports being full. Since then, Gatwick Airport has outstripped those forecasts to reach 42.3 million passengers a year in 2015, a level that the Airports Commission did not forecast until 2030¹ (in 2016, Gatwick further grew its passenger numbers to 43.1 million²).

Without additional runway capacity London's connectivity will worsen in comparison with other global cities, which will in turn restrict the UK's economic prosperity. With the present uncertainty surrounding Brexit, the need for additional runway capacity is even more important to ensure that London has links to emerging markets across the world.

Taken together, the five London airports (Heathrow, Gatwick, Stansted, Luton, London City) serve more routes than any other European city. However, considering Heathrow as the UK's only true hub airport, the number of routes it serves directly is far exceeded by European competitors – Heathrow serves 182 destinations in 82 countries³ whereas Paris Charles de Gaulle serves over 220. This means that it is difficult to cater for new services, particularly in the emerging markets of Brazil, Russia, India and China when competition for slots favours already profitable routes. There is a need to maintain and strengthen the UK's hub airport capacity, but also develop more point-to-point routes. In both cases, increased runway capacity in the South East is critical.

The capacity constraints in the South East affect not only the immediate area but more importantly connectivity across the whole country. As London's airports, in particular Heathrow, act as hubs they need to have appropriate domestic links to regional airports. This will ensure that UK business is effectively connected to both established and emerging markets. Unfortunately, however, those domestic links are themselves restricted in the current situation of capacity constraint in the South East. Airlines are forced to use the limited slots available for the highest yielding routes at the expense of 'thinner' routes. This will ultimately reduce the number of destinations served directly from the UK because the least popular routes would be dropped or

¹ <http://www.mediacentre.gatwickairport.com/press-releases/2016/16-10-10-gatwicks-record-growth-and-booming-long-haul-services.aspx>

² <http://www.gatwickairport.com/business-community/about-gatwick/company-information/gatwick-by-numbers/>

³ <https://your.heathrow.com/takingbritainfurther/heathrow/facts-and-figures/>

much less frequently flown. Clearly, this has negative implications for establishing new routes to new and emerging markets.

In terms of tourist traffic – a key market for the London airports – there is a danger that without increasing runway capacity London could become a spoke served by another country's hub airport. This would make journeys to the UK less attractive for tourists as the journey would be slower and indirect.

Freight is another market served by the aviation sector and forecast to grow. It is particularly high value and just-in-time goods that are delivered by air, such as pharmaceutical products and jewellery. As a "critical freight gateway", Heathrow has far greater significance than Gatwick as logistics operations are located around West London to utilise the range of long haul connections from Heathrow. Therefore, it handles freight 20 times larger by tonnage and 200 times greater by value (non-EU trade) than Gatwick. As the importance of trading partners outside of Europe increases post-Brexit, the volume and value of air freight will grow. The majority of air freight travels in the belly hold of passenger services; therefore more capacity and more destinations are needed to facilitate growth in this sector.

Therefore, KCC agrees that the consequences of not providing additional airport capacity would be to stunt economic growth and diminish the UK's hub status. This will result in a decline in the total number of destinations served, reduce connectivity between the London airports system and the regions, and limit adaptability to changing demand patterns. Fares will likely rise and delays increase, and ultimately the attractiveness of the UK will be reduced for tourists and business travellers. Trade links for air freight will also be diminished.

However, although there is a clear case for increasing airport capacity in the South East, there needs to be appropriate regulation of the new routes that are flown. When Heathrow's Terminal 5 was opened the additional capacity was used by airlines to operate the more profitable routes and the overall range of destinations served actually decreased. The new capacity created by an additional runway must be used as intended to benefit the UK economy – this includes serving more UK regional airports.

Question 2: Please give us your views on how best to address the issue of airport capacity in the South East of England by 2030. This could be through the Heathrow Northwest Runway scheme (the Government's preferred scheme), the Gatwick Second Runway scheme, the Heathrow Extended runway scheme, or any other scheme.

We agree with the assessment that, of the three schemes put forward, Heathrow is the right choice to expand runway capacity. Building on the existing success of this internationally important airport will provide greater benefits to businesses as well as increasing the choice of airlines and destinations for all passengers. Wherever a new runway is built there will be significant negative impacts that will need to be mitigated, primarily for those living in the vicinity of the scheme. It is therefore imperative that the scheme

chosen provides the greatest benefits. Only the Heathrow Northwest Runway scheme provides the substantial benefits required from capacity expansion.

We have seen passenger demand at Gatwick surpass the Airports Commission's forecasts for 2030 already in 2015. Whilst this draft Airports NPS sets the case for a third runway at Heathrow and rules out a fourth, it does not rule out a future second runway at Gatwick. KCC resolved in our *Policy on Gatwick Airport* (adopted by Cabinet, December 2014) to oppose a second runway.

A second runway at Gatwick would double the number of aircraft movements with arrivals and departures on both runways, as the proposal was for the runway to operate in 'mixed mode' to maximise capacity. This proposal could offer no opportunity for respite from runway alternation. The noise impacts on West Kent from Gatwick's current single runway configuration are already unacceptable, and a potential doubling of these impacts would be intolerable. Residents in West Kent, especially the districts of Sevenoaks, Tunbridge Wells and Tonbridge & Malling, are already affected by significant aircraft noise, predominantly arrivals that approach from the east due to the prevailing westerly winds (occurring on average 73% of the time). The situation will only become worse with an increase in flights from the development of a second runway at Gatwick.

With a second runway, Areas of Outstanding Natural Beauty (AONB), including the Kent Downs AONB and the High Weald AONB, are also likely to be over-flown more regularly. The tranquillity of these rural areas will be degraded further from their already compromised position with the existing single runway operation at Gatwick. The level of ambient noise must be a key consideration. The rural tranquillity of the areas surrounding Gatwick would be more substantially impacted from increased overflight than the urban, and already noisy, environment around Heathrow. To this end, we believe the negative impacts of a Gatwick Second Runway scheme have been undervalued.

The increase in the number of flights from a second runway at Gatwick would not only result in greater noise impacts for those already affected by Gatwick's air traffic, but would introduce aviation noise to residents not previously affected. This is because the second runway (proposed to the south of the existing runway) will create new flight arrival and departure routes to the south of the current flights paths associated with the existing runway. As already noted, with independent mixed mode operations there will be arrivals and departures on both runways so no opportunity for respite for those residents affected.

We also believe that the proposed enhancements to surface access infrastructure would be inadequate to support the additional demand at Gatwick. Conversely, the existing and proposed road and rail access to Heathrow is of a superior quality, more reliable, more resilient (as there are multiple routes) and has connections to a much greater catchment area. Gatwick is entirely reliant on the Brighton Mainline and a single motorway, the

M23, and is consequently inaccessible from the west, east and north without travel via London or the M25. Conversely, Heathrow is at the confluence of numerous motorways from all over the country – M4, M3, M40, and M25 orbital – and is equally well-served by numerous rail lines, including the London Underground, Heathrow Express, Heathrow Connect, Western and Southern Rail Access and via interchange at Old Oak Common to High Speed 2.

KCC is also firmly opposed to a new Thames Estuary Airport. We were pleased to see this ruled out by the Airports Commission in 2014 on the grounds that it did not perform well enough to warrant consideration alongside the three shortlisted schemes. Together with Medway Council, we could see no sound evidence that a new hub airport should be constructed off the Kent coast, but rather many economic, social and environmental reasons against such a development. One of these is the forced closure of Heathrow and the devastating impact this would have on the economy west of London. This would in fact be harmful to the UK's global connectivity and be detrimental to the national economy. The very high cost of a new Thames Estuary Airport would make raising the investment required risky, and furthermore the delivery timeline would delay the realisation of the increased capacity that the South East needs today. The surface access options to this location are also currently inadequate and even with significant upgrades, the catchment area for this eastern extremity of the UK would be smaller than Heathrow and Gatwick.

The draft Airports NPS summarises the rationale for the Government's decision on the preferred scheme in relation to the other two schemes. We support the key points:

- Heathrow will provide a greater number of additional flights per year and in doing so the greatest increase in connectivity.
- Heathrow will increase the number of passengers more so than Gatwick.
- Heathrow has a much more significant freight operation and will be better able to facilitate growth in air freight, especially as the UK develops trading links outside of the EU.
- Heathrow will deliver benefits to passengers and the UK economy more quickly.
- Heathrow will create more jobs more quickly.
- Heathrow will deliver more domestic routes and more passengers from outside the South East will make international journeys.
- Heathrow has superior surface access links by road and rail, with more rail improvements to come, and is inherently more resilient than Gatwick.
- Heathrow has committed to delivering an industry-leading mitigation and compensation package, including a 6.5 hour night flight ban.

Although the Heathrow Northwest Runway scheme will have the greatest negative impacts on local communities, it is reasonable to conclude that it will also deliver the greatest benefits and maximise the impact of additional runway capacity. Notably, the net benefits are greater for the preferred

scheme than for the Gatwick Second Runway scheme. Nevertheless, the compensation, mitigation and community engagement must be tailored and thorough as this scheme will impact communities in the vicinity of the airport.

We support the statement in the draft Airports NPS that “*expansion at Gatwick Airport would not enhance, and would consequently threaten, the UK’s global aviation hub status*” because it would remain a largely point to point airport and attract few transfer passengers. The existing constraints at Heathrow and the attraction of competitor hubs in Europe would see a decline in long haul destination served from London. This is also a reason to rule out a second runway at Gatwick in the future. Point to point services are able to operate from the UK’s regional airports using the newer small aircraft with long ranges and growth in this market would be well-served at other locations. Growth in such regional airport services would also serve to maintain overall UK international connectivity in the interim period before a new runway is operational in the South East.

We strongly urge the Secretary of State to amend the draft Airports NPS to rule out the Gatwick Second Runway scheme.

Question 3: The Secretary of State will use a range of assessment principles when considering any application for a Northwest Runway at Heathrow Airport. Please tell us your views.

KCC defers to the comments of the Local Authorities directly affected by the Heathrow Northwest Runway scheme and the statutory and voluntary bodies with expertise in the various areas of assessment.

Question 4: The Government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views.

Quality transport connections to international gateways are vital for the efficient movement of people and goods and for the overall experience of customers. Road and rail links in particular are essential to keep goods flowing and to ensure staff are on site to operate the airport. The emphasis that the draft Airports NPS places on sustainable modes is appropriate and necessary to minimise congestion and environmental impacts, particularly air quality. We also welcome the transparency that will be afforded by committing the applicant to annual reporting against targets on public transport mode share, and other criteria, as this will indicate what other airports can achieve.

In our view, it would be unacceptable for the expansion of Heathrow Airport to have a detrimental effect on the transport routes serving the site because this will not only impact airport users, but people and freight using the networks for other purposes and those living in close proximity – this includes congestion, pollution and health impacts.

Further, transport links must not be considered in terms only of the area immediately around the airport, nor only links into central London. Onward travel must be considered by road and rail to the regions and also other parts

of the South East. Although geographically not far from Heathrow, the road connections from Kent are at present unreliable and the rail journey convoluted and slow, requiring travel through London. We are actively campaigning and working with LB Bexley, Dartford and Gravesham Council and Ebbsfleet EDC to achieve an extension of Crossrail from Abbey Wood to Dartford and Ebbsfleet, which would create a direct link to Heathrow. High Speed 1 has dramatically improved journey times into London from towns such as Ashford, Maidstone and Dover, and the connection of High Speed 2 at Old Oak Common for Heathrow will see similar benefits for towns on the route.

Where transport benefits are shared between non-airport users and airport users, the draft Airports NPS states that a financial contribution will be negotiated from the airport. This is a sensible approach but should not be limited to only the schemes stated in the NPS. For example, pump priming other rail services that may improve connectivity to Heathrow should be a consideration. We welcome the most recent assurances that all surface access improvements required for the delivery of the third runway will be funded by the applicant. The applicant should also be responsible for ensuring that there is no unacceptable disruption to the Strategic Road Network whilst the construction is undertaken, especially the disruption to the M25 whilst it is tunnelled under the new runway. This includes coordinating works programming with other schemes on the network.

The existing range of transport connections to Heathrow provides resilience in the event of an incident – Heathrow is accessible via the M25, M4, M40 and M3, and by rail on the Heathrow Express, Heathrow Connect and Piccadilly Line on the London Underground. Additional investment through planned transport improvements includes:

- The Elizabeth Line (Crossrail 1)
- High Speed 2
- Upgrades to the Piccadilly Line
- The Western Rail Access project
- The Southern Rail Access project

By contrast, Gatwick is dependent on the M23 and the Brighton Mainline, and consequently suffers from unreliability and a lack of resilience in the surface access to the airport.

Regardless of the choice of preferred scheme, good surface access to all London airports is needed to maximise the benefits of the wide range of destinations served. We are still supportive of the reinstatement of a direct rail service from Tonbridge to Gatwick Airport via Edenbridge to extend the economic benefits of the airport into Kent.

With regard to the specific approach to surface access for the Northwest Runway scheme as set out in the draft Airports NPS, we defer to the views of the affected Highway Authorities, Local Transport Authorities, Network Rail,

Train Operating Companies, public transport providers, and any others directly affected by the proposals.

Question 5: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? In particular, please tell us your views on:

5.1. Air quality supporting measures

It has been estimated that poor air quality contributes to approximately five percent of deaths per year and possibly contributes to more mortality and morbidity than passive smoking. The draft Airports NPS identifies that approximately half of the NO_x emissions around Heathrow are due to road transport. Around 14% was due to aircraft. Needless to say, with expansion of capacity at Heathrow the aircraft emissions will increase (although this may be mitigated to some degree in proportion with low emission fuels and improved technologies) and therefore it is essential that road transport emissions are minimised. The air quality strategy for the airport must be coordinated with the surface access strategy – i.e. mode share of transport to and from the airport by private vehicle must be minimised.

Consideration also needs to be given to freight vehicles, potentially through the implementation of a Low Emission Zone type arrangement. This will be increasingly important as the freight operation at the airport will be able to double with expansion.

The UK has commitments to carbon reduction and renewable energy generation, and incentives and legislation to manage air quality; this will require additional low carbon and renewable energy infrastructure, smarter business and travel choices along with the increased uptake of energy demand reduction initiatives. Decisions on development and infrastructure need to consider and integrate such requirements and concerns.

5.2. Noise supporting measures

From our extensive experience with Gatwick Airport, we know that noise is an issue of major concern to residents in the area around airports. Noise at night is by far the least acceptable form of aviation noise and has health implications ranging from tiredness and fatigue, to reduced educational attainment in children. This is an area where much research is still to be done and the assessment of the noise impacts of the proposals in the draft Airports NPS, and their mitigation, should be in accordance with the most recent evidence.

Although the Airports NPS correctly states that technological advancements have reduced the noise footprint of aircraft, the Government must recognise that using metrics such as Equivalent Continuous Sound Level (LAeq) noise

contours removes the variation of each event. It only takes one aircraft to disturb sleep and for the individual affected to suffer.

The aim of the UK airspace modernisation programme to “*reduce the overall level of noise disturbance by ensuring that fewer aircraft overfly centres of population and the airborne holding is at higher altitudes*” will be difficult to achieve in the densely populated South East of England. With significant forecast population growth, beneficial change in the departure and arrival swathes at airports cannot be relied upon to reduce noise impacts over the coming decade.

Appropriate consideration must be given to the different environments around airports and how this impacts the perception of a noise event at a given decibel level. The tranquillity of the predominantly rural area around Gatwick has a low ambient noise level and therefore any noise is significantly more disturbing and incongruous with the natural environment compared with an urban environment. At Heathrow the surrounding area is urban and has a higher level of ambient noise such that aircraft noise may not be so obviously noticed.

The impact on UK airspace in the South East following the construction of the Northwest Runway is presently unclear. Although certainly the greatest noise impacts will be felt by those living in proximity to Heathrow, there could be noise impacts felt at Gatwick where changes to airspace affect the arrivals and departure routes. Where there is a deleterious effect on noise levels around Gatwick then we feel that mitigation should be put in place there as well as the area immediately around Heathrow – whether funded as part of the Heathrow Northwest Runway scheme or by Government as part of airspace modernisation.

We agree with the approach that noise mitigation measures should be subject to consultation to ensure the most appropriate and effective measures are progressed. However, this should not be a means of reducing the overall package of measures delivered, or the cost of them. Steps must be taken to minimise the impacts on the communities affected.

The exact design of the noise envelope should be agreed with relevant bodies around the airport, such as the Heathrow Airport Consultative Committee, Local Authorities, campaign groups and other representatives of the communities affected. A similar model to the Gatwick Noise Management Board could be used to engage such groups, with an independent third party ratifying the plans. This model could also be used to oversee the plans for runway alternation and the timings and operational rules for the 6.5 hour night flight ban.

However, the draft Airports NPS is clear that the night flight ban must be considered subject to the International Civil Aviation Organization’s (ICAO) Balanced Approach. This considers operating restrictions (such as a ban) to be a last resort only after consideration of (1) reduction of noise at source, (2) land use planning and management, and (3) noise abatement operational

procedures. The aim of the Balanced Approach is to balance environmental and economic responsibilities. However, in the context of a scheme as significant as the Northwest Runway (an extra 27 million passengers annually), the noise impacts of the scheme on the communities will need far greater and innovative mitigation than the preceding three tiers of noise abatement measures. Operating restrictions are therefore a necessity. Thus, we consider the NPS statement of the need to subject a night flight ban to the Balanced Approach to be contradictory to the recommendation by the Airports Commission that expansion should only take place with a night flight ban.

Moreover, once the Northwest Runway at Heathrow is operational, we can see no reason why the ban on night flights should not be extended to other London airports so that communities across the South East can benefit from the additional capacity at Heathrow. Without this extended ban, there is a risk that airlines wanting to operate at night will switch their operations to one of the other London airports and make night noise at other airports even worse. This is especially true at Gatwick where the night time is the only time in the summer when spare capacity is available.

The draft Airports NPS states that one of the aims that must be met before development consent can be granted is to “*avoid significant adverse impacts on health and quality of life from noise*”. However, in common with much aviation policy, there should be a definition of what “significant” means. Metrics such as noise contours for defined periods of time average out the true impact of aviation noise and can mask the impact felt on the ground, as well as the subjectivity of individual people. Thus, the more innovative metrics used by the Airports Commission (such as frequency of overflight – Number Above (N) contours) should also be employed in forecasting and monitoring noise impacts due to the Northwest Runway scheme at Heathrow, and any resulting impacts on Gatwick from necessary airspace changes.

N contours map the number of noise events that reach or exceed a certain decibel threshold within a given time period. It is felt that N contours more accurately reflect the reality of living under a flight path by representing the likelihood of hearing noise that exceeds a specified level occurring a number of times of day. Conversely, the commonly used Equivalent Continuous Sound Level (LAeq) contours show a level of noise averaged out over a certain number of hours and can make the real-life experiences of the people on the ground appear much less severe.

The impact of noise on environmentally sensitive sites should also be actively considered and mitigation put in place. This includes strategically important landscapes such as National Parks and heritage assets.

As well as being specified as part of the Development Consent Order process, mitigation measures should be adaptable to the real-life impacts that will only truly be known once the scheme is operational. Furthermore, as new research on the impacts of noise on health is carried out the mitigation package should be required to take findings into account even if development consent has been granted.

5.3. Carbon emissions supporting measures

The Government states that the carbon emissions resulting from the expansion will be within the Government's Carbon Budget. However, it is important that more stringent carbon targets on other sectors of the economy due to increased carbon emissions from the expansion of Heathrow do not have an adverse impact.

In addition, all practicable measures should be taken to ensure carbon emissions minimisation at all stages of construction and operation including comprehensive construction site and supply chain management, flights – including taxiing, ground operations – vehicles, staff travel and buildings and travel by passengers and contractors to and from the airport – which will inevitably increase as a result of expansion.

There should be significant effort to enable further development of electric vehicle infrastructure and joined up, easy to access public transport to decrease use of road vehicles, and support an increase in the use of electric or alternatively fuelled vehicles by construction contractors, operations/supplier vehicles and passenger travel.

Where appropriate, meaningful offsetting such as providing finance to support energy efficiency of housing stock in the local area should also be considered.

5.4. Compensation for local communities

Local communities will suffer the greatest negative impacts from the Northwest Runway scheme, as indeed local communities around any airport have suffered from the growth in the number of flights over the years. Although aircraft are getting quieter, the increased number of flights means that the instances of noise disturbance and regularity of overflight also increases. It is therefore appropriate that communities are compensated for the loss of amenity, loss of property value, and impact on their health. This compensation should include mitigation for noise impacts, such as insulation. However, it should also include financial compensation to recognise that the communities negatively affected will be unlikely to directly benefit from the scheme. Noise impacts cannot be completely mitigated against, for example when residents choose to open windows to their homes or use their gardens, and in these cases a financial award is the only way to compensate residents. This also applies to people who will be overflowed by new flight paths and were previously unaffected.

We therefore consider it appropriate that Heathrow Airport has made a public commitment to deliver a compensation package beyond statutory requirements. The detail of the compensation package should be agreed in consultation with the local communities and representative bodies in the area. For instance, the noise contours suggested to determine the acoustic insulation area are based on average noise exposure whereas frequency contours are widely agreed to provide a more realistic picture of noise around an airport for communities. Once agreed, the compensation at Heathrow

should form the starting point for compensation packages at all airports for noise impacts.

Communities further afield where airspace changes have been required to accommodate the new flight paths should also be compensated. For example, restrictions to the altitude of Gatwick flights could increase noise on the ground. These people should not be forgotten in the NPS.

The future possibility of a national noise levy should be considered by the proposed Independent Commission on Civil Aviation Noise but in the meantime, and for the purposes of the noise impacts of expansion of Heathrow specifically, a community compensation fund appears to be a reasonable approach. Again, this approach should be taken only in consultation with the affected local communities and their representatives.

Question 6: The Government has set out a number of planning requirements that a Heathrow Northwest Runway scheme must meet in order to operate. Please tell us your views. Are there any other requirements the Government should set out?

For other assessment criteria (including biodiversity, land use/green infrastructure, resource and waste management, flood risk, water quality, historic environment, landscape, land instability, dust etc.) we defer to the relevant authorities concerning the impacts and mitigation required.

Question 7: The Appraisal of Sustainability sets out the Government's assessment of the Heathrow Northwest Runway scheme, and considers alternatives. Please tell us your views.

The Appraisal of Sustainability Appendix B Table 5 (page 8) lists the alternative schemes suggested to the Airports Commission that were not sifted out initially. Kent County Council's suggestion for a 'dispersed hub model' is one scheme listed. However, our position has significantly changed since the early engagement with the Airports Commission, and we are now opposed to any expansion at Gatwick Airport. This position was ratified as policy by our Cabinet in December 2014.

As the Appraisal of Sustainability has determined the requirements of the applicant to mitigate negative impacts (or enhance positive impacts), our answers to Questions 3, 4, and 5 already set out our views.

Where the Appraisal of Sustainability addresses the local impacts, we defer to the comments of the local communities, interest groups and Local Authorities. Where the Appraisal of Sustainability addresses technical environmental impacts (such as air quality, soil quality, and so on) then we defer to the relevant expert authorities on the matter.

Question 8: Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents?

The draft Airports NPS rules out a fourth runway at Heathrow, partly to reassure local communities that no further expansion will take place. However, it does not rule out a second runway at Gatwick. We strongly believe that the Airports NPS should take this bold step so that communities around Gatwick are supported in the same way as those around Heathrow. The airspace factors that would prohibit the usefulness of a fourth runway would also affect a second runway at Gatwick because of the challenge of safely managing so many movements in a restricted space.

The Gatwick Second Runway scheme was judged by the Health Impact Assessment to have a lower detrimental impact upon health and inequality. It is stated that this is due to the scheme “*requiring fewer residential properties to be demolished*” and therefore leading to fewer groups suffering health impacts from the risk to their housing. However, the impact on those individuals that would be affected by a second runway at Gatwick is still severe even if there are fewer of them. Similarly, although the collective noise impacts were found to be lower than for the Heathrow schemes, it does not make the situation around Gatwick at present any less intolerable – and with expansion this situation would be made even worse.

Question 9: The Government has a public sector equality duty to ensure protected groups have the opportunity to respond to consultations. Please tell us your views on how this consultation has achieved this.

No comments.