

# AVIATION NGOs DRAW UP HEATHROW FOUR TESTS

Heathrow Airport has an enormous impact on communities in West London. Every day, hundreds of flights take off and land over people's homes, leaving 700,000 people exposed to harmful levels of noise pollution. Over 52,000 people are currently sleep deprived because of night flights, a figure which is getting worse according to the airport's own figures; planes regularly land from as early as 4.30 am, often leaving just 4.5 hours of protected sleep per night. Air pollution levels around the airport are some of the worst in London. On carbon emissions, the airport is solely responsible for roughly half of the UK's total emissions from aviation, and with just 45% of the journeys to the airport being by public transport, it plays a major role in creating local congestion and disruption to road networks.

This is the state of play today, without expansion.

While we don't yet know the full extent of the airport's plans to expand, we do know that in 2018 it proposed more than a quarter of a million flights extra per year – that's more than 750 per day - more than 40 extra planes per hour - flying over millions of people across the whole of London and the Thames Valley.

Every day, forever.

The CEO of Heathrow has privately said that the plans add up to effectively building another airport on one of the busiest sites in the whole country. The airport is hemmed in by two major motorways, roads, sewage works, a power plant, schools, businesses, community facilities and not to mention almost 800 homes which will be demolished to make way for the third runway while 4,750 more would be left uninhabitable. Major traffic disruption and delays at key junctions on the M25 and M4 can be expected for years to come as the bulldozers attempt to route the M25 under the new runway.

## The NGO “four tests”

As a collective of NGOs, we simply do not believe that it is possible to build a project of this scale without immense social, environmental and economic damage.

The Labour party has long claimed that Heathrow expansion should meet “four tests,” which were outlined by Transport Secretary Heidi Alexander in October 2025:

- that it contributes to economic growth across the country
- that it meets our air quality obligations
- that it is consistent with our noise commitments
- and crucially, that it aligns with our legal obligations on climate change, including net zero

However, we believe that the current Government has not been clear enough what the four tests mean. They have become ambiguous terms subject to re-framing and politicisation. We believe that if these tests are to lead to any kind of environmental guarantees, they need to be clearly articulated and should reflect the highest environmental standards and latest science.

In July, the Department for Transport is expected to publish its draft revised Airports National Policy Statement (ANPS), which is the foundational document against which any future development consent order (planning application) from Heathrow will be assessed by the Planning Inspectorate. It will include planning assessment guidance on noise, air pollution, climate and economic benefit questions, among other things.

Ahead of the publication of the revised ANPS, this briefing sets out what the NGO community thinks the environmental tests should be. The Annex (p.6) lays out the assessments we believe should be carried to inform the planning inspectorate about the scale of the environmental impact of a third runway at Heathrow Airport. The Annex also lays out suggested planning conditions that should be included in the draft ANPS, and applied in the event that the expanded airport breaches one of the environmental tests in the future.



## **NOISE TEST - *actual flight paths must be published before a decision***

Any application for a Development Consent Order (DCO) must include modelled noise impacts down to 45dBA Leq (16 hours, day) and 40dBA Leq (8 hours, night).

There should be no increase in the number of people exposed to noise above 51dBA Leq, 16 hours (LOAEL) **before detailed flight path information** and noise exposure contours (including Leq, and N65 metrics) associated with the third runway **have been published**, and the impact is assessed. The government cannot give permission without first informing those who will likely be impacted by increased noise.

To ensure no increase in the number of people reporting high sleep disturbance on 2026 levels the following questions need to be answered:

- Can the project be delivered without any increase in night flights, and by extending the current voluntary ban on scheduling movements between 23.30 to 04.30 (just 5 hours), with additional measures to further limit flights in the shoulder periods?
- How can the airport, working with UK ADS, ensure that flight paths maximise noise reductions for communities, assessed using a range of metrics including (N65, SEL, change in noise, protection of respite quality of life)?
- Can the project maintain a system of predictable respite - highly valued by impacted communities - using continued runway alternation?

## **AIR POLLUTION TEST - *judged against health-based targets from the WHO***

A third runway must not cause a new breach, nor worsen an existing one, of UK legal requirements<sup>1</sup> and the same applies to the stricter levels deemed necessary to protect health as set out by the World Health Organisation, including their Interim guidelines for 2030, as already adopted by the EU.

Can the expansion be delivered within these WHO guidelines for key pollutants such as NO<sub>2</sub> and PM2.5? UK citizens should not be exposed to worse air pollution if airport expansion is allowed in the UK due to weaker limits than the EU.

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<sup>1</sup> Department for Transport, 'UK Air Quality Policy Context', online: <https://uk-air.defra.gov.uk/air-pollution/uk-policy-context>

A third runway must be compatible with any future guidelines on/good practice on UFPs.

Can the expansion be carried out without any net increase in vehicle journeys to the new airport? Can the airport guarantee that the modal share of passengers using public transport travelling to and from the airport increases from the current 45% to at least 65%?

### **REGIONAL ECONOMIC TEST** - *the project should not cause spending to be sucked from regions to the South East*

Will the scheme demonstrate large and well-substantiated net economic benefits for the wider regions of the UK, particularly including the UK's coastal towns and historic tourist destinations?

Can the scheme go ahead without losing any regional connectivity, productivity or jobs from key airport communities outside of London (e.g., Manchester)?

Can the scheme proponents clearly prove that the proposed expansion is cost-effective on its own terms, and **does not require** cross-subsidy from the existing passenger base, tax discounts (such as on Business Rates or future carbon pricing policies), or **public funding** towards any further public transport improvements solely for the benefit of the South East?

Can the scheme proponents show that it is financially viable after all other social and environmental externalities, including air pollution health impacts and noise-related wellbeing losses, have been priced into the scheme with fully costed mitigations and compensation (such as the costs of a noise insulation programme for properties exposed to 54dBA Leq and above)?

### **CLIMATE TEST** - *delivery of Carbon Budget 7 must not be derailed by a third runway*

The assessment of the trajectory of aviation sector emissions under an expanded Heathrow scenario must take into account cumulative emissions from all permitted and forecast airport expansions on the carbon budget as a whole in the UK. Specific carbon budgets should be set for aviation (and for other sectors).

Can the expansion occur without threatening the ability of UK aviation to stay within the carbon budget? Will the cumulative total additional emissions from expanding the airport (including "in the air" and "on the ground" emissions) from the date of opening in 2035 be

compatible with the steep downward trajectory in aviation emissions modelled under the CBGDP in years 2036 & 2037, and delivery of CB7 in each of the years 2038-2042?

The Government's net-zero compatible pathway is reliant on carbon pricing at levels currently higher than the compliance costs for CORSIA<sup>2</sup> and the UK ETS. Can the government commit to a mechanism that ensures the minimum carbon price assumed in the aviation net-zero trajectory is met? In the absence of an internationally agreed post-2035 CORSIA framework, CORSIA emissions reductions should not be included from 2035 in delivery plans for Carbon Budgets 6 and 7.

Has the scheme been tested against the latest scientific and policy developments around accounting for non-CO<sub>2</sub> effects (such as the EU MRV), using a precautionary approach and under the scientific consensus that these have historically made up around two-thirds of the warming from aviation to date?

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<sup>2</sup> CORSIA, 'Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)', online: <https://www.icao.int/CORSIA>

# ANNEX

The Annex includes what should be assessed prior to making a decision according to the tests above, and what planning conditions could be applied if these tests are not met or limits are breached.

## *Noise Assessment*

Assessment - using the results of modelling of actual (not indicative flightpaths), the projected increase in the number of daytime noise impacts as defined by the 51dBA Leq (16 hours) contour for communities affected by the existing runway.

Assess impacts on night noise on the number of movements and Lmax noise footprints between 2300 and 0700.

The results of the Department for Transport's ANNE noise impacts study commissioned in 2024 should be published before the ANPS draft is published.

### **Conditions**

Use of the new runway should be conditional on meeting these night noise targets otherwise capacity constraints will be applied.

The permitted number of annual movements using the new runway will be constrained if local noise limits are exceeded.

The government should set up a noise watchdog or extract a noise levy based against real world compliance tests once the runway is in operation.

The airport will commit to offering noise insulation to all properties exposed to noise levels in excess of 54 dBA Leq (16 hour), and relocation assistance for those exposed to high levels of aircraft noise, consistent with the Gatwick DCO decision in September 2025.

## *Air assessments*

The combined effects of expansion must not detrimentally impact ecosystems and public health. Expansion must be shown not to lead to a new breach caused or an existing one worsened: on limit values as set out in the UK Air Quality regulations 2010 and on the new legally binding target for PM2.5 set out in the Env Act 2021 which is set at 10ug/m3, and

as updated by the Interim target for this to be met by 2030 rather than 2040, (which is the WHO health-based interim guideline and which the EU have as a new Limit Value), and also a level of 20ug/m<sup>3</sup> for NO<sub>2</sub> (which is the WHO health-based interim guideline and which the EU have as a new Limit Value).

Assessment must be made of the spatial distribution of UFP around the airport in the current and future scenarios, to monitor UFP and to undertake to meet any UFP / particle number concentration guidelines that the WHO may produce in future.

Compatibility with NECR (National Emissions Ceiling Regulations, ex-EU) and any successor requirements needs to be ensured.

An assessment of the impact of the new runway on London's NO<sub>2</sub> levels which have substantially improved following the introduction of the London-wide ULEZ in 2024, and that there would be no reversal of achievement of legal limits met.

An assessment of additional NO<sub>x</sub> from increased numbers of arriving and departing planes to be carried out, (considering the 4% year on year increase in NO<sub>x</sub> emissions from bigger planes seen since 2023).

An assessment of the potential increase in vehicle journeys as a result of expansion, taking into account the current baseline of a 45% public transport modal share.

An assessment of the distributional health impacts on local communities from increased air pollution must be carried out.

### Conditions

Use of a new runway must be conditional on it complying with the requirement to not cause a new breach, nor worsen an existing one, of UK legal requirements and the same applies to the stricter levels deemed necessary to protect health as set out by the World Health Organisation, including their Interim guidelines for 2030, as already adopted by the EU - including any future legal limits.

It will be conditional on any **future regulation of UFPs**, according to the precautionary principle.

Use of the new runway will be conditional on better monitoring of localised ozone formation and monitoring of plane emissions of NO<sub>x</sub> and nmVOC precursors; use of the new runway will be conditional on there not being an increase in localised ozone formation.

It will be conditional on no net increase in vehicle journeys and meeting the modal share targets in the test section.

## *Economic assessment*

The consultation documents should include full Green Book and TAG impact assessments of the proposed ANPS. The assessment should not pre-determine an outcome, and should include the process of options assessment and long/short-listing. Social and environmental costs should be fully monetised alongside fare savings and scheme costs. The assessment should also make full use of the suite of tools contained within the Green Book and TAG that are designed to take account of the distributional impacts of a scheme, including distributional analysis and weighting. According to the Green Book, distributional analysis should be applied to any and all micro and macro-economic impacts described in domains such as fare savings, environmental costs, productivity and employment, with winners and losers in different groups, sectors, and UK regions clearly presented. This should include the potential for lost jobs in tourism and hospitality in the UK's wider regions. Sensitivity testing should be conducted, and should go beyond just future input and demand forecasts to properly consider parameter and elasticity error.

The government should set out how it intends to protect the public from the costs of the scheme and cost overruns. This should include a clear indication of the costs incurred by the scheme owners, and how they will be recouped from passengers. The Government should clearly state whether it endorses the prevailing cost allocation model which would see the costs of the expansion cross-subsidised by existing users of the airport. The government should also clearly set out the wider costs to the public, such as those experienced by TFL and other public bodies that will be required to deliver supporting infrastructure, and how they will be paid for.

The government should set out the future path of carbon pricing on both ETS and non-ETS compliant routes. This should include how the government intends to ensure that prices remain above the minimum levels required to manage demand on a pathway compatible with the government's Net Zero delivery plan.

## *Climate assessment*

Assess against legal obligations: The Climate Change Act 2008; The European Convention on Human Rights; the International Court of Justice's recent Advisory Opinion confirmed that states must act with highest possible ambition under a standard of stringent due diligence, and that a mere policy commitment does not discharge the obligation of result - meaning that any measures applied to a third runway approval, including on non-CO<sub>2</sub> emissions, sustainable aviation fuels, and greenhouse gas removals, must be credible, based on the best available science, and effective in practice to ensure aviation does

not push the UK's climate targets out of reach, or cause unacceptable impacts on other sectors.

Analysis of cumulative emissions from the third runway (including departing planes and airport specific "on the ground" emissions) over time with respect all the other currently planned or proposed airport expansions, and under different projections of technological development (with reasonable projections from credible scientific sources, not only those provided by the aviation industry).

The Climate Change Committee's assessment of whether the third runway can be used while keeping within the UK's carbon budgets.

An assessment of the costs, resource implications, including for other sectors, and feasibility of using technological solutions, particularly negative emissions, to address the increase in emissions from the third runway.

An assessment of the non-CO<sub>2</sub> emissions and pathway to address these, including costs, resource implications and feasibility of technological solutions.

### **Conditions**

We expect that Section 5.82 in the current ANPS ("material impact" test) will be clarified and strengthened in order for a meaningful assessment to be made by planning inspectors.

The airport must also be assessed annually against the pillars of the Jet Zero decarbonisation strategy (SAF, greenhouse gas removals, carbon pricing, efficiency and new technology). Use of the new runway will be restricted if these pillars are not performing as planned, and gross emissions from aviation continue to rise.

If expansion is permitted, then it should be a legally binding condition that there must be a quantified, costed plan to address the increase in emissions from the runway, including clarity on how negative emissions will be delivered and paid for, without unacceptable adverse impacts on other sectors, e.g. energy costs, and within the context of overall aviation capacity, demand and emissions across the UK.

With an expected opening date for the new runway in 2035, If aviation emissions are not following modelled reduction trajectories already set out for Carbon Budget 6 in 2035, 2036 and 2037, and then the delivery plans shortly to be outlined for Carbon Budget 7 in each of the years from 2038 to 2042, capacity will be restricted until aviation emissions are back on the expected downward trajectory.

It will be conditional on any future regulation of non-CO<sub>2</sub> effects, according to the precautionary principle.