AEF's Analysis of the performance of the draft HENPS against the NGO four tests briefing

July 2026

Will it provide economic growth across the country?

Unfortunately for the government, the economic case for the third runway has become significantly weaker than it was in 2018. The government has presented a new assessment using the Treasury Webtag guidance, a methodology that calculates what's known as Net Present Value which acts like a societal cost benefit analysis. This revealed that the project could lead to up to **MINUS** £62bn costs to society[1]. The Chancellor announced on the day the HENPS was launched that the project could lead to up to £42bn in benefits - but this was without ANY environmental costs being included, and without the costs of the project being passed onto passengers.

The project also performs shockingly badly against the objective of delivering economic growth to the regions. The Department for Transport commissioned Frontier Economics, which has provided private advice to Heathrow before, to carry out a CGE (Computable General Equilibrium) assessment, to sit alongside the Webtag assessment, which doesn't catch wider economic benefits. But even this report failed to show any real impact - just 0.05% GDP growth which wouldn't be fully realised until 2056 - this was ***ten times*** less than the Chancellor claimed when the project was first resurrected in 2025. Furthermore, that analysis showed that the average for most of the regions outside of London, including Northern Ireland, East Midlands and the North East was around 0.02-0.03%, with zero growth in some cases[2]. The average growth case for London was 0.19% - almost ***ten times higher than for the regions*** and a far cry from the cherished goal of shared regional economic impact.

At the same time, passenger demand forecasts show that an expanded Heathrow cannibalises demand at regional airports such as Birmingham. London's competitor airports, including London City and Gatwick, will see their passenger share collapse, and employment opportunities will re-locate from the regions to the south-east.

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1 https://assets.publishing.service.gov.uk/media/6a469296732d8e7ce5f53bc5/heathrow-expansion-appraisal-report.pdf p46

2 https://assets.publishing.service.gov.uk/media/6a469296732d8e7ce5f53bc5/heathrow-expansion-appraisal-report.pdf p55

Does it Align with our legal obligations on Climate change?

Again, the answer is a clear and unequivocal “no”. The government published its first Aviation Passenger Demand and CO2 Forecasts since 2017 alongside the HENPS documents, and the conclusion is that the sector is falling way behind where the government hoped it would be by now. In the “current trends” scenario, which captures all policy impacts currently in place, with Heathrow expansion, UK aviation emissions will reach 41Mt of CO2 by 2050, an increase from 37MT in the 2022 Jet Zero comparable scenario. Of that, around 6Mt per year will come from an expanded Heathrow[3].

This is very problematic for the UK’s ability to meet its legal carbon budgets. The Climate Change Committee’s balanced pathway said that the 2050 Net Zero figure for aviation should be just 21Mt per year - **half** of what the DfT is now projecting. By 2035, when the new runway is scheduled to open, the UK will be in its 6th Carbon budget (CB6 - 2033-37). The CCC estimates that aviation’s fair share should be about 31Mt per year on average over that period. But the new Aviation Forecasts show that in the current trends scenario, that figure will be much higher at **37.8Mt per year**, clearly putting economy-wide emissions reductions targets at risk.

Furthermore, there is no current credible plan for how these remaining 41Mt of emissions in 2050 will be addressed in order to meet Net Zero and carbon budgets. There is currently no workable policy on how greenhouse removals (GGRs) will scale from a tiny amount available today to meet those commitments. There is also no analysis of the ticket price impact of those significant volumes of removals on future aviation demand in the forecasts.

The government knows that this techno-optimism and confidence in future levers, characteristic of the 2022 Jet Zero strategy, is a dangerous fantasy. Even in a scenario where technology advances more quickly, those remaining emissions from aviation have been revised up from 19Mt to 28Mt per year by 2050 (and still no plan where 28Mt of removals will come from).

The forecasts do not include Corsia offsets in the scenarios. In the CBGDP plan published in 2025, the government included an average of 2.8Mt per year of emissions reductions coming from CORSIA credits, but the DfT’s forecasts now only include the demand impact of the increased price on tickets from CORSIA credits in line with previous forecasts and the Jet Zero modelling. At present, CORSIA will end in 2035 (the year the runway is due to open) and there is as yet, no plan to continue its existence after this date. On carbon pricing, the HENPS consultation provides no information about how the government hopes to meet its expectation of a meaningful carbon price to manage emissions. As of today only about a quarter of UK aviation emissions are covered by the UK ETS (which does not include flights outside of the EU), and Corsia only deals with the growth in international aviation emissions from a baseline of 85% of 2019 levels. The new forecasts show that Jet Zero assumed significant emissions mitigation would come from a rapidly increasing carbon price coming in at well over £400 per tonne in 2050, however the DfT now thinks that price will be closer to £125 a tonne.

Finally, non-CO2 emissions, including contrails, soot, NOx and sulphur, are known to at least double the climate impact of flying. Yet there is nothing in the HENPS that adequately assesses and mitigates the impact of non-CO2 emissions. An expanded Heathrow will

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3 https://assets.publishing.service.gov.uk/media/6a33fea9c6e94f095f3efa8a/2026-uk-aviation-forecast.pdf

primarily cater for long-haul flights across the Atlantic, a region that is responsible for a large share of additional contrail warming.

Does it meet our air quality obligations?

This is difficult to quantify, because the legal obligations on air quality in the UK are hopelessly and dangerously out of date. Currently the UK's legal limit on NO2 is ***twice as high as the EU's***, and 4 times as high as the health based recommendations of the WHO (40ug/m3 to 10ug/m3). Just a few weeks ago, Imperial College revealed that new research showed that we have been seriously underestimating the number of deaths attributable to air pollution[4].

In the 4 tests briefing, the NGO community called for the government to assess the scheme against the health-based recommendations of the World Health Organisation, but the government rejected that. This puts the progress made in reducing NO2 across London in recent years at serious risk. The government's own Health Impact Assessment said that a "large number" [5] of residents will experience higher NO2 concentrations. However, it is difficult to establish the precise figures for that, as the Appraisal of Sustainability (AoS) which accompanies the HENPS publication only updates the forecasts made during the Airports Commission in 2015 and only assess compliance with the out-of–date legal limits.

Using the WHO metrics as an assessment, all 22 NOx monitors within 200m of the airport today would fail the WHO limits, and only 10/22 would meet EU interim targets of 20ug/m3.[6]

And what about the emissions from planes?

The HENPS carried out a review of the NO2 and PM2.5 emissions from aircraft, updating an earlier assessment in 2015 by the Airports Commission. Using ICAO methodologies, the HENPS appraisal now says that NO2 emissions from planes per year, with expansion, will go up from ~7,000t per year to 17,000t, **a 55% increase**. Heathrow itself already admits that *ground-level* aircraft NOx emissions increased by 4% year on year in 2024 and were 1.6% higher than 2019 – mainly due to more larger planes at Heathrow[7]. Furthermore, the AoS concludes that "*it is expected that [NOX] emissions at Heathrow Airport will exceed those presented in the Airports Commission's modelling assessment by 2028" .* This finding mirrors ICAO and European studies on trends in aircraft NOx which have concluded that aircraft NOx levels are higher than previously thought.

The NGOs also asked for an assessment of the precise impact of pollution from ultra-fine particles (UFPs), known to come from planes, in anticipation of future legal regulation of UFPs. The government has merely provided a literature review.

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4 https://www.theguardian.com/environment/2026/jun/24/deaths-london-air-pollution-fallen-imperial-college

5 https://assets.publishing.service.gov.uk/media/6a3391126422bec01b117736/hian-for-the-draft-henps-non-technical-statement.pdf

6 https://assets.publishing.service.gov.uk/media/6a338e20c6e94f095f3ef9db/air-quality-support-for-review-of-anps-review-of-emissions-source-data-and-trends.pdf

7 https://assets.publishing.service.gov.uk/media/6a338de5e590e5e061c9a1f2/air-quality-support-for-review-of-anps-review-of-airside-emissions.pdf p11

And what about congestion and extra vehicle journeys?

TfL previously said the project would lead to an increase of 90,000 vehicle journeys a day. This has not been updated from the Airports Commission. It is universally accepted that an increase of this size would be catastrophic for the local road network, so the revised HENPS states that a developer needs to show that it can meet a mode share increase (passengers switching from car journeys to public transport) from 46% today to 50% when passenger numbers reach 116m, and 55% when passenger numbers meet 130m. Failure to do so could result in limits being imposed on the airport.

So far so good, but there's a catch. The developer only needs to show a "strategic" mode share vision at the DCO stage, and the HENPS **does not require** those plans to be assessed as part of the planning application process. In the kind of staged development which is now being explored, Heathrow could increase its capacity up to 116m before any planning constraints on passenger numbers are even considered if it's not meeting its targets. And if the project does need to include the development of a new rail connection, against the advice of the NGOs, the HENPS fails to rule out the possibility of spending public money to support the development of yet more infrastructure in the South East.

Does it meet our obligations on Noise?

Again this is hard to assess, because there are no legal limits on noise exposure.

The NGO community stressed in our 4 tests that the noise impact of the planning application must be assessed on actual flightpaths. Instead the government will use "indicative" flight paths, which could be subject to change as part of the delayed Airspace Modernisation process. This means that at the point the decision is made, communities are still unlikely to know the precise flightpaths and whether they will be affected by increased noise or not.

Just a few weeks ago, the government published the results of the new ANAS and ANNE noise attitude surveys, which showed that people are annoyed by aircraft noise at much lower levels than previously used in government modelling. Using these new thresholds, the AoS shows that **3.4 million individuals**, or 1.49m households, will be impacted by problematic noise. As yet, we don't know if the new ANAS levels will become official government policy, but AEF believes that they should have been monetised and used in the Webtag assessment, which it appears they were not (see the section above on NPV and economic benefit).

Although the modelling shows that by 2055 (still 30 years from now), the noise impacts of a 3rd runway will have reduced compared to 2024 levels, a 3rd runway still results in **900,000 more** people being exposed to these harmful noise levels than would otherwise be the case (2.5m and 1.12m households).

This means that any benefits for communities through the introduction of quieter planes or possible changes to airspace modernisation are likely to be wiped out by the expansion. Why should these communities so badly impacted by noise have to wait until the 2050s before they see any real reduction in noise?

Critical National Infrastructure

And finally, a point on the proposal to designate a third runway as "Critical National Infrastructure" (CNI).

Notwithstanding key moral considerations as to whether increasing capacity at one airport to largely sustain an increase in leisure travel can ever be justified as CNI, the government's own logic is deeply flawed.

The HENPS references the 2015 Airports Commission as the basis for this argument. However the AC concluded that the need for extra capacity in the South East could be delivered by delivering an extra runway at Heathrow only, *without* expansion at other London airports such as Gatwick. Yet in those intervening 11 years, the government has allowed expansion at all 5 of London's other airports - including a second runway at Gatwick, and expansion at London City, Luton, Southend and Stansted.

The AC's evidence, evoked here to justify the need for a 3rd runway, forecast that if the 3rd runway did go ahead, it would drain demand away from all these other airports. We do not see anything new in the published modelling that challenges this - in fact we see clear evidence in the updated aviation forecasts that if Heathrow 3rd runway goes ahead, demand collapses at the other London airports[8]. The decision to designate the project as a CNI is based on a baseless assertion that the London Airports system will be full by the "mid-late 2040s", yet the accompanying forecasts show a collapse in demand at all the other London airports once Heathrow 3rd runway comes online.

[8] https://assets.publishing.service.gov.uk/media/6a33fea9c6e94f095f3efa8a/2026-uk-aviation-forecast.pdf p87